

# **Wylfa Newydd Project**

## Horizon's Detailed Response to Written Representation at Deadline 4 - Conwy County Borough Council

PINS Reference Number: EN010007

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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 Introduction

1.1.1 Horizon Nuclear Power Wylfa Limited (“Horizon”) has reviewed the report submitted by Conwy County Borough Council (CCBC) at Deadline 2 (4 December 2018) [REP2-287 to REP2-289]. This document responds to the key issues presented within that document as overarching topic areas and provides further detail to the response provided by Horizon at Deadline 3 (18 December 2018) [REP3-010].

1.1.2 The key issues identified in this response are:

- Planning policy
- Housing
- Labour Market
- Supply Chain
- Tourism
- Schools
- Traffic and transport

## 2 Planning policy

- 2.1.1 Horizon agrees with CCBC that low carbon energy generation plays a nationally important role in securing the UK's energy requirements, as set out in NPS EN-1 and NPS EN-6, which together form the primary policy basis for deciding DCO applications for nuclear NSIPs.
- 2.1.2 The Planning Statement [APP-406], and Horizon's Written Representation [REP2-003], sets out the relationship between the relevant NPSs and other material considerations, including Welsh national and local planning policies.
- 2.1.3 Welsh national and local policy can be 'important and relevant' to decision making under section 105(2) of the Planning Act 2008. Where there is a conflict with an NPS the NPS prevails for the purposes of decision making. Whilst unlikely to be fundamental to the consideration of the principles of an NSIP, Welsh national and local policy may be particularly important, for example, in informing mitigation.
- 2.1.4 The Planning Statement and Written Representation provide a commensurate analysis of Welsh national policy and local policy, with the latter focusing on policies contained within the Anglesey and Gwynedd JLDP which specifically relate to Wylfa Newydd.
- 2.1.5 Although the Wylfa Newydd DCO Project is not located within the Conwy administrative area, it is agreed that the Conwy Local Development Plan 2007 – 2022 (adopted October 2013), as well as the emerging draft Replacement Local Development Plan (2018 – 2033), may be important and relevant to the Secretary of State's decision.
- 2.1.6 The Wylfa Newydd DCO Project, including through the proposed mitigation measures that would be secured through the DCO, has fully and robustly considered and addressed matters addressed in national and local planning policies relating, for example, to transport, housing, economic development and tourism. This response addresses those themes that are relevant to Conwy's administrative area.

## 3 Housing

### Distribution of Non-Home Based (NHB) workers

- 3.1.1 Housing impacts are expected only within the Key Socio-economic Area (KSA) which represents a travel time of approximately 60 minutes from the site. The CCBC area is at the edge of the KSA and has only three wards within it – Bryn, Pandy and Pant-yr-afon/Penmaenan.
- 3.1.2 Workers who take temporary accommodation are expected to cluster in areas closest to the site in order to minimise travel times. Of the 3,000 workers expected to seek accommodation at the peak of construction, just over 1,000 are expected to be in North Anglesey, just under 900 in west Anglesey and just over 600 in south Anglesey. Menai Mainland is expected to host just over 450 workers with fewer than 20 of these being within the three CCBC wards in the KSA.
- 3.1.3 Horizon does not believe that at this level of demand there are likely to be significant housing impacts in the CCBC area. Horizon has reviewed the analysis included in Appendix 2: Policy in Practice Report 'The impact of the Wylfa power station on low-income private tenants' [REP2-287] but notes that this is based on rent increases of 25% and 40%. Given the level of demand forecast in Conwy (together with the evidence on rents included at Table 2.3 of Appendix 1 "Housing Evidence and Mitigation Costs Report") Horizon does not believe that such rises are likely. Horizon therefore disagrees with the assessment in paragraph 7.3 that demand patterns are "likely to impact on Conwy" or "likely to impact on stressed housing demand." There is no evidence to support these assertions.

### Monitoring and mitigation

- 3.1.4 Horizon agrees with CCBC that monitoring will be required to monitor the distribution of workers, including in Conwy. As set out in the Workforce Management Strategy [APP-413] and draft DCO s.106 agreement [REP3-042], the Workforce Accommodation Management Service will collect data on where all NHB workers live and will report that to the Wylfa Newydd Major Permissions Oversight Panel so it will be possible to monitor how many workers are choosing to live in Conwy.
- 3.1.5 Welsh Government has proposed monitoring a range of measures of housing market activity and benchmarking them to identify impacts that relate to the Wylfa Newydd DCO Project. Horizon supports this in principle and discussions are ongoing about how it might be achieved in practice.
- 3.1.6 A number of further measures are also provided in the draft DCO s.106 agreement. Where there is evidence of a significant adverse effect on accommodation caused by the Wylfa Newydd DCO Project (including an increase in homelessness, a lack of access to the private rented sector or a need for additional officer time, as defined in Schedule 5 of the draft DCO s.106 agreement), there will be a release of money from the s.106 Accommodation (Contingency) Fund.

- 3.1.7 Further, the draft DCO s.106 agreement provides that funding for up to three Accommodation Officers will be provided during the Construction Period who will, among other things, liaise with Gwynedd Council and CCBC to ensure a collaborative approach to monitoring accommodation matters relating to the Wylfa Newydd DCO Project.
- 3.1.8 In addition, Horizon proposes that a Worker Accommodation (Annual) Contribution will be applied by IACC towards the cost of, amongst other things, monitoring instances of homelessness and housing displacement within the Daily Construction Commuting Zone ("DCCZ") as a result of the Wylfa Newydd DCO Project and working with Gwynedd Council and CCBC to undertake such monitoring.
- 3.1.9 Horizon also acknowledges that some measures to prevent housing impacts caused by demand for accommodation may need to be put in place early to ensure they are available in advance of the peak of the construction workforce and because of the relatively long lead-times for some measures. It is therefore proposing to make early contributions through the Worker Accommodation (Capacity Enhancement) Contribution that will support the provision of additional housing supply. As set out in Schedule 5 of the draft DCO s.106 agreement, Horizon proposes that CCBC would receive 5% of the £10,000,000 fund.
- 3.1.10 As noted by CCBC, the Site Campus is a key part of Horizon's proposed mitigation. Horizon will provide the Site Campus in line with the workforce requirements and has submitted an updated Phasing Strategy at Deadline 4 (17 January 2019) that secures this. Horizon is confident the Site Campus will be popular with workers because of its proximity to the main site and because of the range of facilities it will offer. Furthermore, having built the Site Campus it will also be in Horizon's interest to ensure it is occupied.

## Appendix 1

- 3.1.11 Appendix 1 to CCBC's submission, entitled 'Update on housing evidence and mitigation costs' [REP2-288] reviews Horizon's baseline assumptions and then sets out potential mitigation contributions. The following table sets out Horizon's position on the review of the baseline. Discussions on mitigation contributions in the draft DCO s.106 agreement are ongoing so Horizon reserves its position on these matters.

**Table 3-1 Review of Appendix 1: Evidence on the potential supply of accommodation**

Issue	Response
Home-based workers	<p>Horizon disagrees with the contention that its assessment is simplistic and does not take into account the characteristics of the KSA. As set out in the Environmental Statement, Chapter C1 - Socio-economics [APP-088] and in the Jobs and Skills Strategy [APP-411], there is detailed assessment that underpins the estimate of 2,000 home-based workers which Horizon believes is achievable. Furthermore, the Environmental Statement is based on a workforce of 9,000 when Horizon thinks only 8,500 will be needed.</p> <p>If the workforce does peak at 8,500 and the number of HB workers was only 1,500 this would have no additional impacts above those assessed in the Environmental Statement as the total NHB workforce would still be 7,000. Horizon does not think it is going to miss its target for home-based workers by 25% and is confident its estimate of 2,000 is achievable.</p>
Temporary Worker's Accommodation (TWA)	Matters relating to TWA are addressed above.
Latent accommodation	The baseline is not challenged by CCBC.
Caravan & Tourist Accommodation	The analysis is the same as in the Welsh Government Written Representation [REP2-367]. Horizon disagrees with the basis of the assessment and has responded to this in paragraphs 1.14.10-1.14.15 of its response to the Welsh Government [REP3-034].
Owner Occupied	The analysis is the same as in the Welsh Government Written Representation [REP2-367]. Horizon disagrees with this assessment and has responded to this in paragraphs 1.14.16-1.14.17 of its response to the Welsh Government [REP3-034]
Private Rented Sector	The analysis is the same as in the Welsh Government Written Representation [REP2-367]. Horizon disagrees with this assessment and has responded to this in paragraphs 1.14.18-1.14.28 of its response to the Welsh Government [REP3-034].

## 4 Labour market

- 4.1.1 Horizon agrees with CCBC that there are opportunities for residents to benefit from Wylfa Newydd's jobs. Horizon is committed to working in partnership with stakeholders across North Wales, including CCBC to maximise these opportunities and to minimise the risk of adverse impacts.
- 4.1.2 The CCBC report draws on the analysis in Appendix C of the Welsh Government Written Representation [REP2-367]. Horizon disagrees with this assessment and has responded to this in paragraphs 1.8.3-1.8.32 of its response [REP3-034].
- 4.1.3 As also set out in that response, Horizon recognises that there are risks and therefore proposes that the Skills Fund and Wylfa Newydd Employment and Skills Service (WNESS) be used to provide mitigation and support for training and backfilling vacancies including in non-construction roles. Horizon acknowledges that some people may choose to move from other sectors to work on the Wylfa Newydd DCO Project and intends to support backfilling of any vacancies through the WNESS. The WNESS will assist in the recruitment of new employees to the labour market; train and upskill both new entrants and others; and provide a brokerage service by filling vacant posts to support businesses which encounter difficulty finding appropriate replacements when workers move on to the Wylfa Newydd DCO Project. Horizon intends to secure the WNESS through the draft DCO s.106 agreement, which is being negotiated with IACC.

### Engagement with children and young people in activities and careers related to STEM

- 4.1.4 Horizon notes CCBC's position to 'welcome' the target that 85% of the operational workforce of the Wylfa Newydd DCO Project is to be recruited from the local area. As noted in the Jobs and Skills Strategy, STEM engagement is considered central to ensure this target is achieved.
- 4.1.5 As noted in paragraph 7.3.1 of the Jobs and Skills Strategy, "early, constant and progressive engagement with local school children and young people, including with their teachers and parents, is essential to spark initial aspiration and ensure sufficient numbers of local people are available for training and qualification into operational work". The Strategy also goes on to state "Horizon currently has a programme of engagement with schools called the 'Dyfodol/Futures' educational engagement programme. This engagement plan is available to all schools on the Isle of Anglesey as well as schools in north Gwynedd and rolling out to the county borough of Conwy in both English and Welsh. The aim of this programme is to promote Science Technology, Engineering and Maths (STEM) and includes attending Career Fairs, assisting with mock interviews, delivering talks, skills events and apprenticeships awareness sessions."
- 4.1.6 Since 2015, education engagements by Horizon has increased from 27 events/engagement activities in Wales during Financial Year (FY) 2014-2015 to 81 during FY 2016-2017. Up to the end of December 2017, Horizon has

participated in 50 events/engagement activities in north-west Wales and engaged with over 800 primary pupils across Anglesey, Gwynedd and Conwy.

4.1.7 In addition to Horizon's on-going and planned engagement with children and young people in activities and careers related to STEM, Horizon has also been training teachers and supporting schools to deliver the necessary education and skills required to achieve the Energy Island Programme. Such training and support resources have been developed with local primary school teachers while also being mapped to the Curriculum of Wales.

4.1.8 Other provisions in respect to the engagement with and training of people, albeit not specifically targeted at young people, are outlined in Schedule 4 of the draft DCO s.106 agreement. Provisions of note within this Schedule include the 'Jobs and Skills Implementation Plan' and the 'Skills Fund' that will assist directly with recruitment during construction and operation. The Jobs and Skills Implementation Plan will be in place for the first three years of construction and updated according to local and regional needs periodically thereafter. Additionally, the Skills Fund is expected to provide financial backing to deliver any aspect of the Jobs and Skills Implementation Plan as well the overarching Jobs and Skills Strategy.

4.1.9 Given the above information and the fact that Horizon is already committed within the DCO Application to encouraging and facilitating engagement in STEM activities and careers within the region, and proposes to increase such engagement in line with expectations, in order to achieve the 85% target for the operational workforce to be based locally, Horizon does not consider it necessary to make additional commitments in this respect as part of the consenting process. Horizon does however welcome CCBC's offer of future cooperation, collaboration and engagement as necessary as the Wylfa Newydd Project is developed.

4.1.10 For further information please see Horizon's response to IACC's Local Impact Report, specifically Chapter 3: Economic Development – Local Employment and Chapter 7: Education and Skills.

## **Local employment – maximising local benefits and reducing potential risks**

- 4.1.11 In response to CCBC's request to 'work with Horizon Nuclear Power and partners such as the Welsh Government, the Isle of Anglesey County Council and the North Wales Economic Ambition Board to determine an optimal target for local employment – with a focus on higher value posts – which maximises local benefit and minimises any potential risks', Horizon believes that its assessment is a realistic share of both employment at Wylfa and the capacity of the local labour market to deliver it. Horizon has put in place a range of measures that seek to ensure that the number of home-based ("HB") workers is delivered and that this is focused in Anglesey and North Wales. The WNESS will be key to achieving this and Horizon will require its contractors to advertise all external vacancies through the WNESS and for there to be a period of exclusivity during which they are only advertised through the WNESS and only to local residents.
- 4.1.12 Horizon agrees with CCBC that there are opportunities for residents to benefit from Wylfa Newydd's jobs. Horizon is committed to working in partnership with stakeholders across North Wales, including CCBC to maximise these opportunities and to minimise the risk of adverse impacts.
- 4.1.13 For more information on Horizon's plans and ambition to maximise benefits and opportunities locally throughout the duration of the project, please refer to Horizon's response to IACC's Local Impact Report, specifically in respect to Chapter 3: Economic Development – Local Employment; Chapter 4: Economic Development – Supply Chain; and Chapter 7: Education and Skills.

## 5 Supply chain

- 5.1.1 Horizon will openly share opportunities for local suppliers associated with the Wylfa Newydd DCO Project, however, it cannot allocate opportunities on a local or regional basis due to competition requirements and responsibilities. Horizon will work via the Supply Chain Service and the actions identified within the Supply Chain Action Plan to best prepare and allow businesses in the locality and region to take advantage of the opportunities. Horizon will also promote its supply chain for sub-tier packages, where practical and possible, through the procurement portal.
- 5.1.2 Furthermore, there is no evidence of a likely significant impact in respect to local employment displacement to which mitigation is definitely required. Horizon acknowledge that there may be a risk of non-significant impacts and Horizon's proposals provide for such impacts to be monitored and mitigated through the Jobs and Skills Implementation Plan (JSIP), the WNESS, the Skills Fund and through specific commitments to support early workforce planning.
- 5.1.3 Horizon acknowledge CCBC's request to be fully involved in the development and delivery of the WNESS, however, given the geographical area which it will cover as well as the fact that the areas of concern cited by CCBC are much aligned to those of the already established 'strategic partners' (i.e. Department of Work and Pensions, Welsh Government, Horizon, IACC, Grwp Llandrillo Menai, and North Wales Economic Ambition Board), Horizon is confident that such areas of concern will be addressed sufficiently and outwith CCBC membership.
- 5.1.4 For further information please see Horizon's response to IACC's Local Impact Report, specifically Chapter 3: Economic Development – Local Employment; and Chapter 4: Economic Development – Supply Chain.

## 6 Tourism

6.1.1 In response to CCBC's request to ensure sufficient resources are made available to mitigate potential adverse effects on the perceptions of the area as a destination and the potential impact on the availability of visitor accommodation, Horizon has made provisions to mitigate any potential adverse effects in regard to these concerns within Schedule 3 of the draft DCO s.106 agreement. Such provisions include the following:

- Horizon has committed to include annual contributions for marketing and sector support, of £100,000 per year during construction, and for two years post construction (totalling £1.1m). Horizon proposes that this will be applied by the IACC, liaising with Gwynedd Council and CCBC where appropriate for joint tourism promotion initiatives;
- a tourism officer for the duration of the construction programme (totalling £360,000); and
- Horizon also proposes that Gwynedd Council and CCBC may make applications for release of the Tourism (Contingency) Fund where such application must provide adequate evidence of significant adverse effects or which forecasts trends that are likely to lead to significant effects on tourism in the local authority areas of Gwynedd and Conwy County Borough.

6.1.2 Horizon also proposes to establish the Accommodation, Tourism and Leisure sub-group. This sub-group will be comprised of relevant stakeholders such as Horizon, IACC, Welsh Government, NRW and the Emergency Services. This sub-group will examine monitoring returns and advise on release of the tourism contingency fund.

6.1.3 Furthermore and in addition to direct tourism funding via the draft DCO s.106 agreement (Schedule 3), indirect support for the sector is also provided via the measures and funding outlined within schedule 5 of the draft DCO s.106 agreement. This mitigation and funding relates to worker accommodation, specifically to avoid the overburdening of the tourism accommodation stock on and off the island. This includes the provision of capacity enhancement funding, funding for 'Accommodation Officers' throughout the construction period to monitor housing and engage with the Wylfa Newydd DCO Project, and the Workforce Accommodation Management Strategy [APP-412].

6.1.4 For further information please see Horizon's response to IACC's Local Impact Report, specifically Chapter 5: Tourism.

## 7 Schools

- 7.1.1 As reported within Chapter C1 of the Environmental Statement [APP-088], paragraph 1.5.50, there are approximately 1657 available primary school places in 87 primary schools across the KSA, equivalent to a surplus of 14% of school places. At peak construction, it is estimated that workers would bring 285 partners and 220 dependents. These dependents would add to the primary school population and under a worst case scenario it is assumed that all would be of primary school age.
- 7.1.2 Under this scenario, the additional demand would mean that enrolment numbers would increase to 88% of total capacity from the current position of 86%; i.e. a 2% increase in demand leaving a 12% surplus capacity.
- 7.1.3 While primary school capacity across the KSA as a whole is sufficient to accommodate the forecasted numbers of dependents of non-home-based workers, it is recognised that there are areas where demand may result in capacity constraints (as shown in table C1-15, C1), this may include the east of Conwy County Borough. In areas where there are issues with lack of capacity, school places for dependents will be accommodated in an area of equal or similar suitability. Dependents have been distributed across KSA sub-areas in line with the distribution of non-home-based workers estimated through the gravity modelling.
- 7.1.4 Furthermore, in the event of adverse effects on schools in Conwy County Borough materialising, Horizon proposes in the draft DCO s.106 agreement that IACC would use reasonable endeavours to work with CCBC to monitor the number of workforce children enrolling in local schools by monitoring the available supply of primary and secondary school places within Conwy County Borough, and to provide a capacity report to the Jobs and Skills Sub-Group, established in accordance with the draft DCO s.106 agreement. Horizon proposes that CCBC may apply to the Jobs and Skills Sub-Group for release of monies under the Education (Contingency) Fund where such application(s) must provide adequate evidence of significant additional demand or which forecasts trends that are likely to lead to significant additional demand.
- 7.1.5 There is not anticipated to be significant adverse effects on community and the Welsh language from dependents taking places within schools on Anglesey or elsewhere in the KSA.

## 8 Traffic and transport

8.1.1 The CCBC report states that controls on traffic flows and timings of mitigation should be controlled.

8.1.2 Horizon's DCO application contains several control documents which secure the measures identified to mitigate the environmental effects of the construction, operation and decommissioning of the Wylfa Newydd DCO Project. These have been enhanced during the Examination period, and Horizon's considers that these are adequate to address the concerns of CCBC. In relation to traffic and transport, the following controls are proposed:

### 8.2 Wylfa Newydd Code of Construction Practice (CoCP)

8.2.1 The Wylfa Newydd Code of Construction Practice (CoCP) has been updated since the submission of the DCO application. Version 2 of the CoCP (submitted at Deadline 2 (4 December 2018)) [REP2-031] contains enhanced controls. The traffic and transport related controls within the CoCP are contained in Chapter 5 and are summarised below:

- Shift patterns and timings, these are proposed in order to reduce peak traffic flows.
- Commitment to deliver at least 60% of construction materials required for the Wylfa Newydd DCO Project via the Marine off Loading Facility (MOLF).
- HGV movements to be limited to 160 per day and 40 per hour, per direction in line with the Transport Assessment [APP-101].
- Commitment to implement and monitor a car sharing scheme, with a target of 2.0 workers per vehicle across the Wylfa Newydd DCO Project in the peak year in line with the Transport Assessment [APP-101].
- Commitment and details on how to manage and monitor HGV movements.
- Details on how Horizon will assist statutory authorities in the event of a traffic incident.
- Commitment to control and monitor car park availability depending on the number of workers on the Wylfa Newydd DCO Project.
- Workers Code of Conduct and Information Packs.

8.2.2 Further changes will be incorporated in to the next version of the CoCP including:

- Further details on construction traffic management and monitoring.
- Reduced hourly HGV caps (22 per hour) during the early years (pre opening of the A5025 Off-Line Highway Improvements) in line with the Transport Assessment [APP-101].

- Commitment to achieving the car share ratio of 2.0 construction workers per vehicle across the Wylfa Newydd DCO Project in the peak year of construction.

## 8.3 Phasing strategy

8.3.1 In addition to the controls above in the CoCP, the Phasing Strategy [APP-447] commits Horizon to providing key mitigation by certain dates, including the MOLF, Park and Ride Facility and the Logistics Centre.

## 8.4 Fly-parking

8.4.1 The CCBC report states that they have concerns over the impact of potential fly parking by Wylfa Newydd construction workers in their County.

8.4.2 The Workforce Management Strategy [APP-413] states that “Any personnel found to be parking outside designated areas (or 'fly parking') will be disciplined”.

8.4.3 Members of the public or stakeholders will be able to notify Horizon of suspected fly-parking incidents (see details of this in Chapter 3 of the CoCP) which will then be investigated. Any workers in breach of the clause in the Workforce Management Strategy will then be disciplined.

## 8.5 Other

### Distribution of construction workers

8.5.1 The CCBC report states that they have concerns over the impact on traffic and transport if the distribution of construction workers estimated in the DCO application is materially different in reality.

8.5.2 The Transport Assessment includes traffic modelling based on assumptions of where workers will live taken from the Gravity Model. Following discussions with the Welsh Government and Gwynedd Council as part of the SoCG process, a series of sensitivity tests was undertaken using VISSIM to examine the operation of the Britannia Bridge with different assumptions concerning the home locations of workers. These sensitivity tests included assuming the proportion of workers who lived on the mainland doubled. The results of the analysis showed that the increased traffic would not be expected to affect the results presented in the DCO Transport Assessment [APP-101]. This reflects the transport strategy which ensures that worker shifts are timed so that workers avoid travelling over the Britannia Bridge during periods of peak traffic flow.

8.5.3 It is important to note that the current estimates for the number of construction workers residing on the mainland in all areas outside of Gwynedd in the peak construction year is 470 as set out in paragraph 6.3.12 of the Integrated Traffic and Transport Strategy document [APP-107]. Of this number, two thirds are expected to be on the day shift (310) and they will be staggered over three shift start and end times (103 per shift) and broken down further again by mode

of transport. Therefore the impacts of workers travelling from the mainland are not considered to be substantial.

8.5.4 As the Wylfa Newydd DCO Project will take several years to reach the peak of activity, and hence peak workforce numbers, Horizon will monitor and refine the transport strategy to reflect any changes that occur including in terms of workforce locations compared to that assumed in the DCO. Horizon has committed via the CoCP to monitor the transport strategy and further commitment is scheduled to be incorporated in to the next version of the CoCP as outlined above. This together with the existing controls as outlined above, ensures Horizon will have adequate controls on when and where traffic associated with the Wylfa Newydd DCO Project will occur.

### **Park and share sites**

8.5.5 The CCBC report states that they have concerns over the lack of park and ride and park and share on the mainland;.

8.5.6 The Wylfa Newydd DCO Project includes a Park and Ride facility at Dalar Hir. This facility (together with the shuttle bus network, Site Campus and promotion of car sharing) is considered to be sufficient to serve the transport needs of the Wylfa Newydd DCO Project. Other park and ride sites have been considered but as described in paragraph 12.2.3 of App C2-4 DCO Transport Assessment [APP-101] they are not considered necessary to manage or mitigate traffic flows associated with the Wylfa Newydd DCO Project. However, Horizon will work with stakeholders to consider the use of proposed park and share facilities, on the basis that those schemes may be delivered by others, as complementary components of the transport strategy for the Wylfa Newydd DCO Project. If those schemes are delivered, Horizon recognise that it could potentially provide flexibility, for example as park and share facilities which could be available for workers car sharing.

### **Stockpiling**

8.5.7 Horizon confirm that stock control and stock piling will occur on site to mitigate against potential disruptions to deliveries due to bad weather or traffic incidents. This is deemed sufficient to mitigate against potential delays to deliveries. Furthermore the Request for Non-Material Change (number 2 [AS-021]), now accepted into the Examination, increases the upper daily limit for marine vessel movements from four to 16 movements per day. This will support programme recovery following delays, for example after bad weather. Any temporary additional deliveries by road will be made within the limits defined in paragraph 5.4.13 of the Wylfa Newydd CoCP, ensuring that the total number of construction vehicle movements to the WNDA does not exceed the assessed threshold.