

Wylfa Newydd Project

Horizon's Detailed Response to Written Representation at Deadline 4 - Gwynedd County Council

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1.1 Introduction

1.1.1 Horizon Nuclear Power Wylfa Limited (“Horizon”) has reviewed the report submitted by Gwynedd Council at Deadline 2 (4 December 2018) [REP2-297 to REP2-303]. This document responds to the key issues raised within that document by overarching topic areas and provides further detail to the response provided by Horizon at Deadline 3 (18 December 2018) [REP3-013].

1.1.2 The five topics addressed in this response are:

- DCO requirements
- Welsh language and culture
- Traffic and transport
- Skills
- Housing and accommodation
- Tourism
- Education
- Service provision

1.2 Summary of engagement

1.2.1 Horizon has engaged proactively with Gwynedd Council to understand and seek to address its concerns throughout the pre-application process and following the submission of the DCO application. This has included regular meetings and workshops on topics of interest to Gwynedd Council. Full details of this engagement are set out in the draft Statement of Common Ground (“SoCG”) between Horizon and Gwynedd Council [REP2-051].

1.2.2 Horizon welcomes Gwynedd Council's acknowledgement that a new nuclear facility at Wylfa has the potential to bring positive economic and social benefits to the Gwynedd Council administrative area (paragraph 1.4) and considers that significant progress has been made in relation to the areas of concern to Gwynedd Council, many of which are addressed through the draft DCO s.106 agreement [REP3-042]. Horizon believes that these can be satisfactorily addressed throughout the examination.

1.3 DCO requirements

1.3.1 Horizon does not agree that the draft DCO requirements are inadequate. The approach that Horizon has taken to the DCO requirements is to limit their number by securing the majority of the mitigation proposed within control documents via the provisions in Schedule 3 of the draft DCO. Horizon considers that the management strategies in the Wylfa Newydd Code of Construction Practice (“CoCP”) [REP2-031] and associated sub-CoCPs [REP2-032 to REP2-036], along with the mitigation secured elsewhere in other control documents, contain sufficient detail to secure the mitigation required to appropriately mitigate the adverse effects of the Wylfa Newydd DCO Project.

1.3.2 Horizon continues to engage with Gwynedd Council and other stakeholders on these matters, and engagement to date has led to additional detail being added to control documents submitted at Deadline 2 (4 December 2018). Horizon has also made further commitments, as noted in Horizon's responses to the Examining Authority's Written Questions [REP2-375] and in other Deadline 3 (18 December 2018) responses, to add additional detail to the control documents to be submitted at Deadline 4 (17 January 2019). Horizon acknowledges that further refinement of the control documents will occur throughout the course of the Examination.

1.3.3 Horizon responds to the specific requirements requested by Gwynedd Council in the topic specific chapter responses below.

1.4 Welsh language and culture

Assessment of effects on the northerly parts of Gwynedd

1.4.2 As set out in paragraph 6.3.10 of its report, Gwynedd Council is concerned that insufficient consideration has been given to the possible Welsh language and culture effects of the Wylfa Newydd DCO Project on the Gwynedd Council administrative area, and specifically the northerly parts of the county. Horizon has included the Menai Mainland, which is a subdivision of Gwynedd, within its assessment of Welsh language and culture, as set out in the Welsh Language Impact Assessment (WLIA) [APP-432]. The Menai Mainland includes the most northerly parts of the County (north-east of Bangor).

1.4.3 The subdivision of Gwynedd in the assessment has allowed the assessment of more localised effects that may be felt at this level, comprising: population characteristics; quality of life; cost of housing, infrastructure supply and education; and social and cultural aspects. As set out in the SoCG, there is on-going discussion between Horizon and Gwynedd Council in relation to this matter.

Possible negative effects on the communities of Bangor and the mainland

Distribution of construction workers and accommodation

1.4.4 Gwynedd Council note concerns that construction workers will not be able to find accommodation within the areas assumed in the gravity model (paragraph 6.3.16 of its report). Gwynedd Council are content with the use of the gravity model for predicting the distribution of construction workers and their families moving into the Key Socio-economic Study Area (KSA) [REP2-051]. Horizon consider that the gravity model is the most appropriate approach for assessing the number of workers and dependents moving into the KSA. Horizon also consider that the mitigation measures, secured via the draft DCO s.106, provide sufficient flexibility to be responsive to this issue as informed by the monitoring, and enabled by the Wylfa Newydd Major Permissions Oversight Panel (WNMPOP). Schedule 5 of the draft DCO s.106 secures the Workforce Accommodation Management Service (WAMS), which will monitor the

workforce accommodation choices, including location and type of accommodation.

1.4.5 Gwynedd Council express that they would expect robust thresholds for reporting and monitoring the spatial distribution of workers in order to minimise the potential effects of a large temporary workforce on the use of the Welsh language within Gwynedd communities (paragraph 6.3.30 of its report). Schedule 1 of the draft DCO s.106 includes a commitment for Horizon to collect aggregate and anonymised data on the workforce dependents who move to the KSA through the WAMS, including the Welsh language skills of partners and children, the number of children and their ages. As set out at 3.2.15 of the CoCP [REP2-031], it will be the responsibility of the WNMPOP to determine precise monitoring requirements and timing, following recommendations from the relevant sub-group. As highlighted in the SoCG, the implementation of the proposed monitoring is highlighted as a matter for further discussion with Gwynedd Council.

1.4.6 There is also a commitment within Schedule 1 of the draft s.106 to complete an evaluation of the impact of the Wylfa Newydd DCO Project on the Welsh language in the KSA, with the parameters of such evaluation to be agreed with the Welsh Language and Culture Sub-Group. It is proposed that the Welsh Language and Culture Sub-Group will include representatives of Gwynedd Council.

1.4.7 Schedule 1 of the draft s.106 provides a commitment that Horizon will report to the Welsh Language and Culture Sub-Group:

- Every six months on its implementation and performance of its obligations in relation to Developer led Welsh language management and policy, recruitment and careers, engagement with contractors and Welsh Language Officer Contribution;
- Quarterly in respect of the collection on data on the workforce dependents via the Worker Accommodation Management Service; and
- Following completions of the evaluations of the impact of the Wylfa Newydd DCO Project on the Welsh language in the KSA.

Displacement

1.4.8 Gwynedd Council believe that there is likely to be some degree of displacement within the county which could have an adverse effect on the linguistic demography of wards and communities (paragraph 6.3.18 of its report).

1.4.9 The SoCG identifies that whilst Gwynedd Council remains concerned that increased demand may lead to displaced tenants or increased rents for vulnerable people, the SoCG also recognises that some landlords will want to house construction workers rather than housing benefit tenants and neither Gwynedd Council nor Horizon can influence this. It is agreed that the plan, monitor and manage approach is reasonable.

1.4.10 Schedule 5 of the draft DCO s.106 provides a commitment from Horizon to collect monitoring data in relation to accommodation, to include monitoring the

workforces' accommodation choices including the location of the accommodation and type of accommodation, and to provide such monitoring data to the Accommodation, Tourism and Leisure Sub-Group on a quarterly basis, or other such reasonable period agreed with the Accommodation, Tourism and Leisure Sub-Group.

1.4.11 The draft DCO s.106 also provides a commitment to an Accommodation (Contingency) Fund. In the event that the Accommodation, Tourism and Leisure Sub-Group determines that the accommodation monitoring data provided in relation to the above, indicates a significant adverse effect on the accommodation sector within the KSA or forecasts trends that are likely to lead to a significant adverse effect on the accommodation sector within the KSA as a result of the Wylfa Newydd DCO Project:

- it will make a recommendation report to the WNMPOP as per Schedule 16 of the draft DCO s.106; and
- The WNMPOP may make a mitigation direction as per Schedule 16 of the draft DCO s.106.

1.4.12 Schedule 5 of the draft DCO s.106 includes Gwynedd Council as being party to the WAMS Oversight Board. Accommodation Officers which are secured via Schedule 5 of the draft DCO s.106 will liaise with Gwynedd Council during the Construction Period. It is also proposed that the Accommodation, Tourism and Leisure Sub-Group will include representatives of Gwynedd Council.

Impact on schools and pupils

1.4.13 The main concern raised by Gwynedd Council is the possible effects of the Wylfa Newydd DCO Project on schools and as a result, influence on the language use of other children in the community (paragraph 6.3.20 of its report). Concern is raised specifically about schools in the Bangor area. The assessment presented in the WLIA considers the effect on primary and secondary schools across the KSA which include schools in Bangor as a sub-area of the KSA. Measures to mitigate effects on immersion education within the KSA as secured via Schedule 1 of the draft DCO s.106, also covers areas of the county which fall within the KSA. Therefore, Horizon considers that the effects of the Wylfa Newydd DCO Project on schools in the Menai Mainland area of the county have been adequately assessed, with mitigation measures to address those effects proposed and secured via the draft s.106 agreement [REP3-042].

1.4.14 Gwynedd Council raise concern that many mitigation measures proposed in relation to Welsh language and culture are insufficient to cover implementation within the county (paragraph 6.3.14 of its report). Several measures are designed to be sufficiently flexible to be implemented in different geographic areas. For example, measure 16 of the Welsh Language & Culture Mitigation & Enhancement Strategy (which is secured via Schedule 1 of the draft DCO s.106), refers to funding two or more peripatetic teachers to support current Welsh immersion education within Gwynedd Council if monitoring (see paragraph 8.2 of the draft DCO s.106 agreement) submitted at Deadline 3 (18 December 2018) indicates a need to do so. Horizon is

currently considering revising this mitigation in the draft DCO s. 106 agreement to include three Welsh immersion teachers, one of which would be based in the Menai area.

1.5 Traffic and transport

1.5.1 Paragraphs 6.1.3 and 6.1.4 summarise the overarching concern Gwynedd Council has, which relates to the flows of traffic during the construction period travelling through the Gwynedd Council area and associated, related effects.

Menai and Britannia Bridges

1.5.2 Given that much of the additional traffic flows on the Britannia Bridge are forecast to avoid the most congested times of day, Gwynedd Council consider there should be vehicular limits and the hours of travel dictated in a DCO control document to ensure that unacceptable travel scenarios do not occur. Gwynedd Council is also concerned that due to the nature of the traffic flows there will be “peak spreading”.

1.5.3 Regarding construction worker traffic, the worker shift timings (which are controlled via the CoCP) will control the times at which construction worker traffic moves on the highway network, which reduces the peak flow. Therefore “peak-spreading” is highly unlikely to occur due to the Wylfa Newydd Project.

1.5.4 Regarding construction delivery traffic, the DCO Transport Assessment [APP-101] assesses the worst case scenario in terms of traffic impacts as 40% of all construction materials required by the Wylfa Newydd DCO Project arrives by road. This is up to double the number of HGVs that would occur in reality as the aim is deliver 20% of all construction materials required by the Wylfa Newydd DCO Project by road. This therefore represents a robust scenario. The CoCP contains a commitment to deliver at least 60% of all construction materials via the MOLF, which therefore limits the proportion of construction materials that can be transported by road to the level assessed in the DCO Transport Assessment [APP-101].

1.5.5 Notwithstanding the above, in the unlikely event that any “peak-spreading” of construction delivery traffic occurs, the traffic flows across the Britannia Bridge are significantly lower in all hours outside of the AM and PM peak periods, as shown in Figures 11-3 and 11-4 of the DCO Transport Assessment [APP-101]. Therefore it is unlikely that traffic impacts greater than already assessed in the AM and PM peak hours would occur.

1.5.6 The traffic impacts of construction delivery and construction worker traffic have been fully assessed in the DCO Transport Assessment [APP-101] and the CoCP contains controls to limit this traffic to the levels assessed in the DCO Transport Assessment [APP-101].

1.5.7 Gwynedd Council is also concerned that construction of the National Grid North Wales Connection would add to traffic flows on the Britannia Bridge and potentially create congestion. The cumulative impact of National Grid traffic on the operation of Britannia Bridge has been assessed in Appendix L

of the Transport Assessment [APP-113] and both projects will work together to further reduce traffic impacts.

1.5.8 Gwynedd Council note that both bridges can suffer from traffic delays during peak periods, which include the main holiday season as well as typical commuting peaks. The Britannia and Menai Bridges have been assessed in the peak year of construction during the peak hours of 08:00-09:00 and 17:00-18:00, which aligns with the observations of peak traffic outlined by Gwynedd Council. Analysis of the impacts of the holiday season is discussed in the Transport Assessment [APP-101] in Section 11 and has been assessed as part of the VISSIM modelling undertaken as reported in Appendix I of the DCO Transport Assessment [APP-110].

Bad Weather

1.5.9 The bridges across the Menai are subject to closure when there is bad weather. Gwynedd Council state it would not be acceptable for HGVs or workers to 'loiter' on mainland highway routes or remain in towns awaiting the bad weather to pass.

1.5.10 The CoCP has been updated with the following additional text relating to Horizon's role in the event of an incident:

- Horizon and its supply chain have no statutory authority in the event of a traffic incident on the road network. However, Horizon and its supply chain will assist with incident management planning through the following measures.
 - Maintaining a site-based delivery management team as a contact point for contractors, emergency services and the highway authorities. This team will help manage and coordinate Horizon and its supply chain's response to an incident.
 - Controlling the number and frequency of Heavy Goods Vehicles (HGVs) on the designated HGV routes.
 - Establishing an appropriate communications protocol for workers, bus drivers transporting construction workers and HGV drivers.
 - Communicating incident management information to all workers, contractors making a delivery and bus operators transporting workers.
 - Holding HGVs and buses at appropriate locations, including the Logistics Centre, during an incident.

1.5.11 Therefore Horizon has strengthened its position of how it will manage delivery traffic in the event of an incident in accordance with North Wales Police requests not to submit a separate Traffic Incident Management Plan and to adhere to all instructions given by the North Wales Police in the event of an incident.

Accident data

1.5.12 Gwynedd Council note at paragraph 6.1.11 that an analysis of existing accident data was undertaken and the increase in traffic flows associated with the Wylfa Newydd DCO Project could change the risk of accidents occurring on the road network and impact upon the safety of road users.

1.5.13 The impact of the Wylfa Newydd DCO Project on accidents is assessed in Appendix E of the Transport Assessment [APP-106]. The DCO application includes mitigation measures that will enhance road safety including the A5025 On-Line and Off-Line Highway Improvement Works, and the Code of Conduct which requires the workforce to sign up to measures which include ensuring adherence to the Highway Code, speed limits, and other measures to ensure drivers associated with the Wylfa Newydd DCO Project drive safely and considerately. See the Workforce Management Strategy [APP-413] for further details of the Code of Conduct. This will ensure that Wylfa Newydd DCO Project related drivers are considerate and drive in a safe manner.

Traffic flows

1.5.14 Gwynedd Council state at paragraph 6.1.14 that mitigation measures will not remove additional traffic completely. Therefore, there should be requirements set out in the Wylfa Newydd CoCP [REP2-031], or other appropriate documentation, to ensure the traffic flows modelled in the Transport Assessment [APP-101] are not in excess of those modelled or last for a longer period of time than that set out in the construction programme and therefore cause prolonged / higher impacts than those forecast.

1.5.15 The Wylfa Newydd CoCP contains several commitments to limit traffic to that assessed in the DCO Transport Assessment. Commitments include:

1.5.16 Limiting HGVs to the numbers assessed in the Transport Assessment, which is a maximum of 40 HGVs per hour or 160 per day, per direction along the A5025.

- Shift timings, this will control the times at which construction worker traffic moves on the highway network, which avoids the AM and PM peak periods.
- To deliver at least 60% of all construction materials via the MOLF, this therefore limits the proportion of construction materials that can be transported by road to what is assessed in the Transport Assessment.

1.5.17 Further, the Wylfa Newydd CoCP was updated at Deadline 2 (4 December 2018) [REP2-031] with amendments as follows:

1.5.18 During the majority of the construction programme, most of the construction workers wishing to drive to the Wylfa Newydd Development Area (WNDA) or Dalar Hir Park and Ride facility will be required to car share. Horizon will target an average car share ratio of 2.0 people per car in the peak construction year.

1.5.19 Horizon will therefore implement a car-sharing database which will likely utilise internet and mobile phone-based applications to match workers who

wish to drive to the WNDA or Park and Ride facility. The Construction Workers Accommodation Management Portal would be used as a basis to form the database, which will be secured through the draft DCO s.106 agreement.

- 1.5.20 The level of car sharing required will vary depending on the number of construction workers, the availability of parking spaces, and the number of construction workers travelling to site by non-car modes such as shuttle buses, amongst other factors. Vehicle occupancy requirements, and changes to them, will be advertised clearly to all construction workers well in advance.
- 1.5.21 The existence of such a database and matching system will be communicated to all employees, including that non-adherence to the car-share policy could result in refusal of entry to the WNDA or Park and Ride facility. Repeat offenders could face enforcement action.
- 1.5.22 Horizon commits to manage, monitor and regulate the availability of car parking spaces to reflect the number of workers on the Wylfa Newydd DCO Project, balancing an over-provision of car parking (which could encourage car travel) with an under-provision of car parking (which could encourage fly parking).
- 1.5.23 The impacts of construction traffic have been fully assessed in the DCO Transport Assessment [APP-101] and the CoCP [REP2-031] contains controls to limit this traffic to what is assessed in the DCO Transport Assessment.

Phasing

- 1.5.24 Gwynedd Council state at paragraph 6.1.15 that there should be further detail set out in any phasing of the development to ensure that facilities, such as the MOLF are built to the modelled programme timescales and, if not in place when set out, mitigation measures introduced to ensure that any early years impacts from the lack of the MOLF or any extensions to any construction programme are addressed and traffic flows limited.
- 1.5.25 The timing of the delivery of key mitigation, including the MOLF, Logistics Centre, and Park and Ride Facility is secured in the Phasing Strategy [APP-447].
- 1.5.26 The next version of the CoCP will contain lower HGV caps on the A5025 in the early years (before the Off-Line Highway Improvement Works are open) as follows:
 - 2,500 per month per direction:
 - 160 per day per direction; and
 - 22 per hour per direction

Fly-Parking

1.5.27 Gwynedd Council is concerned that fly-parking will occur as a result of the development. Gwynedd Council considers that measures and monitoring need to be in place from implementation to stop fly-parking early and before it becomes an issue.

1.5.28 Any incidences of fly-parking will be investigated and enforcement action taken. The Workforce Management Strategy [APP-413] states at paragraph 2.2.1 that "Any personnel found to be parking outside designated areas (or 'fly-parking') will be disciplined", which is considered to be a sufficient disincentive. Similar measures are in place at the Hinkley Point C project and are successful as noted by stakeholders who thanked EDF for their resolution of fly-parking occurrences in the Hinkley Point C Transport Forum meeting in November 2017 (see meeting minutes available on the EDF Hinkley Point C website - <https://www.edfenergy.com/download-centre>) and again in November 2018 (noted by Steer, Horizon's Transport consultants for the Wylfa Newydd DCO Project, who attended as observers).

1.5.29 Only workers living within 600m of a bus stop will be allocated bus as a mode of transport to travel to/from the WNDA, this will negate the need for any worker to drive and park at a bus stop which avoids any nuisance parking around bus stops caused by Wylfa Newydd workers. Parking at bus stops is therefore not proposed.

Shuttle buses

- 1.5.30 Gwynedd Council consider that shuttle buses should be established from the start, with fixed routes and stops that are regularly reviewed.
- 1.5.31 As set out in the Transport Assessment [APP-101], shuttle buses will be demand dependent to ensure that buses go where demand exists from construction workers to maximise take-up and to ensure as far as possible that buses are not on the highway network without passengers, potentially causing unnecessary additional traffic. An indicative bus route map is shown at Figure 5-5 of the Transport Assessment.
- 1.5.32 Gwynedd Council is also concerned that local bus operators would be attracted to provide these shuttle bus services and it would result in shortages to other services that are required for services, such as school transport. Horizon are not yet at the tendering stage for bus operators. It would not be the intention of Horizon in executing its transport strategy to cause any adverse impacts to other local bus services.

Worker Locations

- 1.5.33 Gwynedd Council has concerns that workers would not be able to find accommodation within the areas assumed within the Transport Assessment [APP-101]. Horizon has undertaken a robust assessment of transport impacts. If additional unforeseen impacts arise during the construction phase of the Project, these can be reported to the Transport sub-group and access to additional funds can be applied for under the Transport (Contingency) Fund, as set out in the draft DCO s.106 agreement [REP3-042]. Furthermore VISSIM sensitivity tests have been undertaken and shared previously with Gwynedd Council regarding the operation of the Britannia Bridge, this included a scenario where the proportion of construction workers residing on the mainland was doubled. The conclusions stated that there is very little impact owing to such a change in construction worker home / temporary residence locations, mainly due to the shift pattern timings which avoid travel by construction workers during the AM and PM peak hours.

Early Years Assessment

- 1.5.34 Gwynedd Council is concerned that the local traffic impacts from the construction of the MOLF, Park & Ride facility, Logistics Centre, Site Campus and A5025 Off-line Highway improvements could have local effects on highways that have not been assessed. Construction traffic associated with the construction of all Associated Development sites has been assessed in the Transport Assessment [APP-101]. This is shown in Figure 7-6 of the Transport Assessment which details the breakdown on HGV movements by construction site.
- 1.5.35 If the above measures are not delivered and operational when they are programmed to be, then Gwynedd Council consider that measures are needed to address this. The Wylfa Newydd CoCP [REP2-031] at paragraph 5.4.12 secures that the MOLF will cater for at least 60% of the total construction material required for the Project. The Phasing Strategy [APP-

447] also commits to when key mitigation, including the MOLF, will be delivered by.

1.5.36 The next version of the CoCP will contain lower HGV caps on the A5025 in the early years (before the Off-Line Highway Improvement Works are open) as follows:

- 2,500 per month per direction
- 160 per day per direction
- 22 per hour per direction

Adequacy of the DCO, including requirements and obligations

1.5.37 Gwynedd Council requests that the following elements are set out and are committed to in the DCO control documents:

- limits on all vehicular traffic in terms of volumes, timings, restricted hours and duration of movements;
- detailed Phasing Strategy of the project;
- traffic monitoring and management details, with penalties and mitigation set out for exceeding limits; and,
- travel planning details to manage traffic and set out measures of control.

1.5.38 As set out above the latest versions of the Wylfa Newydd CoCP and associated sub-CoCPs [REP2-031 to REP2-036] set out measures that would control when traffic travels on the road network, including:

- The construction vehicle delivery route;
- Construction worker shift start and end times;
- HGV delivery window; and,
- Limits proposed on the number of HGV movements allowed in any given hour or day on the A5025, before and after the Off-Line Highway Improvements are operational

1.5.39 The Phasing Strategy [APP-447] sets out when key mitigation is to be delivered and is also a control document.

1.5.40 Regarding monitoring, Section 5.6 of the Wylfa Newydd CoCP states that Horizon will monitor freight vehicle movement including HGV numbers and deliveries via the MOLF using a delivery booking system.

1.5.41 Further detail on delivery management and construction traffic management will be provided in the next version of the CoCP.

1.6 Skills

1.6.1 Gwynedd Council's report begins with a profile of Gwynedd and a table on residents' views of what makes the area good and not so good to live in and what would make it better. Top of the things that are not so good is the "lack

of good quality jobs" and the top thing to change is "more jobs with higher salaries". The Wylfa Newydd DCO Project could offer both to residents of Gwynedd.

- 1.6.2 Gwynedd Council raises concerns about the displacement caused by local residents changing jobs and moving to the Wylfa Newydd DCO Project. Although paragraph iii of Appendix 2 of the Gwynedd Council report defines displacement as, "The proportion of intervention outputs/outcomes accounted for by reduced outputs/outcomes elsewhere in the target area," the report itself does not follow this definition. Rather, there appears to be an assumption that residents will change jobs (labour market churn) to there being displacement as a result, i.e. a reduction in economic activity elsewhere. Horizon does not consider that there is any evidence to support this conclusion.
- 1.6.3 Appendix 2 of the Gwynedd Council report is more circumspect and refers merely to a risk of displacement. Paragraph iii of the Executive Summary states:

"There is a risk that employees may be displaced from established businesses in Gwynedd, which will create a cost for the business to replace them, with a risk that they cannot be replaced which will mean a longer-term negative impact."
- 1.6.4 Appendix 2 of the Gwynedd Council report then goes on to use displacement incorrectly in paragraph xvii which states, "Therefore, employment of home-based workers from Anglesey may displace people who live in Anglesey and work in Gwynedd." Such people would not be being displaced, but rather they would be changing job and there is no evidence presented to show how there would be "reduced outputs elsewhere" (thereby meeting the definition of displacement as referred to in Appendix 2).
- 1.6.5 The report makes reference to a constrained labour market and refers to Appendix 2. However, Appendix 2 defines the labour market incorrectly as it is based on people eligible for Jobseekers Allowance (JSA). At paragraph 2.2.6 it claims that the JSA measure is better than the broader International Labour Organisation (ILO) Definition.
- 1.6.6 Horizon's response to the Welsh Government's Written Representation submitted at Deadline 3 (18 December 2018) [REP3-034] sets out in detail, from paragraph 1.8.3, why this approach is wrong and why it significantly understates the extent of labour market capacity, so it is not repeated here.
- 1.6.7 The Gwynedd Council report provide evidence that there will be displacement that meets the definition set out in paragraph iii of the Gwynedd Council report . It identifies risks and things that may happen but provides no evidence for a measurable level of displacement.
- 1.6.8 The report from Gwynedd Council goes beyond Appendix 2, in asserting that there will be an impact (for example paragraph 6.2.19 states, "An insufficient labour supply will lead to the displacement of posts from local businesses to Horizon Nuclear Power and its contractors").

1.6.9 Horizon does not believe there is evidence of a likely significant impact. However, Horizon does acknowledge the risks identified and has therefore proposed measures to deal with them through the Jobs and Skills Strategy [APP-411], the accompanying Skills Fund and the Wylfa Newydd Employment and Skills Service (WNESS). 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.

1.6.10 This will meet the request of Gwynedd Council in paragraph 6.2.22 for support for local businesses to 'backfill' posts where staff have been lost.

1.7 Housing and accommodation

1.7.1 Gwynedd Council's report challenges Horizon's assumptions with respect to housing and accommodation, but does not provide any additional evidence on accommodation capacity or likely impacts arising as a result of Horizon's proposals. EN-1 paragraph 5.12.7, suggests limited weight should be given to socio-economic impacts that are not supported by evidence. Horizon acknowledges however the risks and uncertainties identified by Gwynedd Council and accepts the principle that mitigation must be available to Gwynedd if there are significant impacts that require it.

1.7.2 Paragraph 3.4 of Appendix 5 to Gwynedd Council's report includes some comments on Horizon's evidence, particularly relating to the functioning of the private rental market, but without providing detailed alternative evidence. It states that "churn" is a better approach than vacancy in estimating capacity, but does not demonstrate why.

1.7.3 It then purports to show the effect of applying a churn approach, even though neither the level of churn, nor the proportion that would be available to construction workers is known. Figures of 10%-50% availability are presented, but these are purely assumptions used as examples, with no evidence. For these reasons, Horizon considers that the approach put forward in Appendix 5 of the Gwynedd Council report should be disregarded. It should, however, be noted that the report concludes that a rate of 50% might be adequate to accommodate workers on Anglesey (at up to 127 bed spaces per month) and that if the rest of the KSA is included then it rises to 271 bed spaces per month, implying both that the Menai Mainland area has a role to play in accommodating workers (which Horizon supports) and that there would be enough accommodation.

1.7.4 Paragraph 3.4 also appears to misunderstand the mechanism by which the Private Rented Sector (PRS) would provide additional capacity. Horizon's evidence is not about landlords switching from students to workers, but about stimulating release of vacant accommodation in response to additional demand from workers (facilitated by improved market co-ordination from the

Workforce Accommodation Management System). This can be through reletting of long-term vacant properties but also through reducing the average length of voids between lettings, which effectively creates new capacity overall. These issues are not addressed or taken into account in the Arc4 report provided as Appendix 5 to Gwynedd Council's report.

- 1.7.5 In support of the above, Gwynedd Council's response to First Written Question Q10.1.10 (part (e)) with respect to PRS in Bangor states "Anecdotal evidence suggest that there may be a surplus supply of private sector student accommodation in the City". Any surplus in supply would be expected to support the supply available to workers.
- 1.7.6 Section 4 of the Gwynedd Council report includes a number of assertions about the effects of worker accommodation for Hinkley Point C in Somerset, and activity within the private rental market. These statements are not supported by any evidence in the report and appear to be purely anecdotal in nature. They should therefore be disregarded (as set out by EN-1 paragraph 5.12.7).
- 1.7.7 It includes in Sections 5 and 6 of the Gwynedd Council report a range of current baseline data on homelessness, and the demand for and cost of housing services. Paragraph 5.42 asserts that there will be significant impacts as a result of the Wylfa Newydd DCO Project, but does not provide any evidence to support this claim. Indeed, it also notes in paragraph 5.44 that a range of factors could impact on this "most notably the full roll out of Universal Credit".
- 1.7.8 The report concludes that monitoring is needed to help shape mitigation. Horizon agrees that not all effects can be known in advance, and that there are risks of unforeseen changes to the housing market in future. For this reason, Horizon has committed to work with the Councils to agree a s.106, including a Worker Accommodation fund to support future mitigation. Horizon has proposed various measures in the Draft DCO s.106 Agreement [REP3-042] relating to housing, which are described further below.
- 1.7.9 In relation to the cost of housing, the WAMS would provide a mechanism to monitor the effects of the Wylfa Newydd Project on the supply and demand for accommodation and housing as a result of the inflow of non-home-based construction workers and their families. In the draft DCO s.106 agreement [REP3-042], Horizon proposes that Gwynedd Council would be represented on the board established in accordance with the Workforce Accommodation Strategy [APP-412] to oversee the operation of the WAMS.
- 1.7.10 Horizon will provide housing funds through the draft DCO s.106 agreement to mitigate impacts on housing that cannot be managed through the WAMS. The Worker Accommodation (Capacity Enhancement) Contribution will be flexible and would be used to incentivise provision of new housing, especially affordable housing, bring vacant properties back into use, encourage provision of more latent accommodation; fund measures to improve the function of the housing market and fund officer time to deal with any increase in homelessness. Horizon proposes that Gwynedd Council would receive 20% of the £10,000,000 fund.

- 1.7.11 Further, in the draft DCO s106 agreement Horizon sets out 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 Conwy County Borough Council (CCBC) to ensure a collaborative approach to monitoring accommodation matters relating to the Project.
- 1.7.12 In addition, Horizon proposes that a Worker Accommodation Annual Contribution will be applied by IACC towards the cost of, among other things, monitoring instances of homelessness and housing displacement within the DCCZ as a result of the Wylfa Newydd DCO Project and working with Gwynedd Council and CCBC to undertake such monitoring.

1.8 Tourism

- 1.8.1 In response to paragraphs 6.2.24 – 6.2.28 of Gwynedd Council's report, Horizon acknowledge that there is anticipated to be a minor adverse effect on the tourism sector of Anglesey as a result of Wylfa Newydd DCO Project.
- 1.8.2 To mitigate this Horizon has identified a range of initiatives in the draft DCO s.106 agreement that would support the tourism sector, based on mitigation outlined in ES Volume C, Chapter C1 [APP-088]. For example, Horizon proposes that, through the draft DCO s.106 agreement, a Tourism (Annual) Contribution will be applied by IACC, liaising with Gwynedd Council and CCBC where appropriate for joint tourism promotion initiatives. Horizon also proposes that Gwynedd Council and CCBC may make application(s) to the Accommodation and Tourism Sub-Group for release of the Tourism (Contingency) Fund where such application 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 the two counties.
- 1.8.3 In respect to Gwynedd Council's reservations or concerns regarding the use of visitor accommodation to house temporary workers working on the Wylfa Newydd DCO Project during its construction, Horizon only proposes to utilise such accommodation in circumstances where some workers will need to use visitor accommodation simply because they are only on site for a few days at a time (and therefore will not use accommodation within the private-rented sector (PRS) or other long-term options). The Site Campus will not always have capacity for these non-permanent workers. It is not uncommon for workers and tourist to use the same accommodation – it happens at present and is managed effectively by the tourism operators so therefore such occurrence is not incompatible. The amount of visitor accommodation required by workers is very small as a share of total supply and well under the level of spare capacity even in periods of peak occupancy. The potential for conflict is small because the number of workers is small as a proportion of tourists and the peak usage will only be for a short period – the workforce is only above 4,000 for one year (i.e. one peak tourist season).
- 1.8.4 Furthermore, and as outlined in paragraph 4.4.5 of ES Appendix C1-2 [APP-096], "Approximately 64% of respondents to the Tourism Accommodation Survey were interested in housing workers, primarily to improve their year-round income stream, and they could supply 1,302 bed spaces."

1.9 Education

1.9.1 This section sets out a response to Gwynedd Council's concerns relating to the possible impact of the Wylfa Newydd DCO Project on schools within the Gwynedd area.

1.9.2 In paragraph 6.3.21, Gwynedd Council highlight Bangor as an area of concern in terms of school capacity. Horizon's analysis presented in ES Volume C1 - Socio-economics [APP-088] accounts for capacity in the Menai Mainland area of the key socio-economic study area (KSA), which includes areas of Gwynedd such as Bangor. This indicates that this area simultaneously has the largest amount of available capacity (Table C1-15 [APP-088]) and the smallest number of workers/ dependent children (Table C1-9 [APP-088]). Therefore, the area is likely to experience the smallest impact, whilst being able to access the same mitigation as other areas.

1.9.3 Gwynedd Council state in its report that many of Bangor's primary school are already beyond capacity. According to section 1 and 2 referring to September 2017 data in this document produced by Gwynedd Council¹ four out of the nine primary schools are over capacity: two of these primary schools are over capacity by 20 and 95, respectively; the other two primary schools are over capacity by 3 and 1, respectively. Meanwhile, there are five other primary schools that have surplus places of 32, 30, 22, 15, and 1, respectively. These figures are different to the school capacity and pupil enrolment figures shown in section 3.3 of the following document produced by Gwynedd Council² that also state the figures refer to September 2017 data. Due to these conflicting sources, it is difficult to draw a conclusion as to Gwynedd Council's stance on capacity constraint.

1.9.4 Given the fact that the assessment of the demand for school places within the KSA has been derived from the distribution of non-home-based workers estimated through gravity modelling, Horizon estimate that 220 dependent children will come to the KSA at the peak of construction; as stated above, a reasonably small proportion are likely to enrol at Bangor's primary schools and there is sufficient capacity within Bangor to accommodate these children. This is shown in Table C1-15 from the project wide socio-economic analysis in ES Volume C, Chapter C1 [APP-088]. In addition, the Gwynedd Council meeting that was cited³ as evidence of lack of capacity discusses proposals to increase capacity in the area.

¹ <https://democracy.cyngor.gwynedd.gov.uk/documents/s16362/Item%206%20-%20Appendix%203%20-%20Future%20of%20Primary%20Education%20Provision%20in%20the%20Bangor%20Catchment%20Area.pdf>

² <https://democracy.cyngor.gwynedd.gov.uk/documents/s16361/Item%206%20-%20Appendix%202%20-%20Future%20of%20Primary%20Education%20Provision%20in%20the%20Bangor%20Catchment%20Area.pdf>

³ <https://democracy.cyngor.gwynedd.gov.uk/ielistdocuments.aspx?cid=133&mid=2237&ver=4>

1.9.5 Horizon query the assertions made within the Gwynedd Council Deadline 2 (4 December 2018) submission [REP2-297] and are confident of the methodological approach undertaken and subsequent findings reported with respect to school places and capacity within C1 [APP-088]. Gwynedd Council is also proposed to have access to the £3M Education (Contingency)Fund alongside IACC and CCBC, as set out in schedule 6 of the draft DCO s.106 agreement

1.10 Service provision

1.10.1 Horizon welcomes Gwynedd Council's recognition that there are unlikely to be any significant local impacts based upon the assumptions developed by Horizon.

1.10.2 While Horizon does not currently propose that Gwynedd Council would be designated as a member of the WNMPOP, it is likely that Gwynedd Council would be a member of one or more of the 'Engagement sub-groups'. Such engagement sub-groups would be responsible for monitoring the frequency, location and method of monitoring potential impacts of the Wylfa Newydd DCO Project. The findings relative to its monitoring would be compiled into a summary report, citing recommendations thereafter.

1.10.3 Along with Gwynedd Council, other voluntary (non-profit) groups from the third sector could also be designated as a member of such engagement sub-groups. Such involvement would assist with ensuring adequate and appropriate response/resolution to any unforeseen significant impacts that the Wylfa Newydd DCO Project may bring locally. Furthermore, the assessment of potential impacts on 'Public Safety' was included as part of the scope of the socio-economic assessments for the Environmental Statement Volumes D to H [APP-122, APP-241, APP-268, APP-357]. These Assessments show that no significant adverse effects on public safety are anticipated during the construction or operational phase.

1.10.4 Further measures proposed to ensure public safety and community cohesion are not significantly impacted, including the range of measures and strategies outlined within the Wylfa Newydd CoCP, the sub-CoCPs, and the Workforce Management Strategy (including a 'Code of Conduct' for workers to adhere to). In addition, as set out in Section 3 of the Wylfa Newydd CoCP, Horizon proposes to set up a Community Liaison Group and a free telephone hotline that can be engaged with or used by anyone with concerns about the construction programme or any other aspect of the Wylfa Newydd DCO Project. Horizon considers the provision of such measures and strategies and the establishment of 'engagement sub-groups' as a direct and sufficient approach in satisfying the requirements of the policies within the JLDL cited by Gwynedd Council.