



## Wylfa Newydd Project

### Horizon's Responses to IACC's Deadline 3 Submission

PINS Reference Number: EN010007

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

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# 1 Contents

Section 1: FWQ2.0.33

Section 2: FWQ4.0.28

Section 3: FWQ4.0.72

Section 4: FWQ4.0.87

Section 5: FWQ10.1.7

Section 6: FWQ10.2.6

Section 7: FWQ10.4.2

Section 8: FWQ11.1.1

Section 9: FWQ11.1.2

Section 10: FWQ11.1.5

Section 11: FWQ11.1.6

Section 12: FWQ11.1.10

Section 13: FWQ11.1.12

Section 14: FWQ11.1.15

Section 15: FWQ11.1.16

Section 16: FWQ11.1.19

Section 17: FWQ11.1.24

Section 18: FWQ11.1.26

Section 19: FWQ11.1.41

Section 20: FWQ17.0.8

## 2 Introduction

### Purpose of statement

This statement provides a summary of the applicant's response to the Isle of Anglesey County Council's Deadline 3 Submission [REP3-055] which provides comments on Horizon's response to the Examining Authority's First Round of Written Questions published at Deadline 2. Horizon have conducted a targeted approach, only providing responses where it is considered relevant and necessary. On this basis Horizon have not provided a response to every comment made provided by IACC. Responses are answered in the sequence set out in IACC's response.

**FWQ2.0.33:** Chapter D9 table D9-10 on page 136 states that the off-site enhancement area would be established prior to the commencement of start of Site Preparation and Clearance Work, how would this be secured?

**HORIZON'S RESPONSE TO FWQ:** The off-site notable wildlife enhancement area referred to in Table D9-10 has already been established and secured with a 15 year lease by Horizon. This measure therefore does not need to be secured through the draft DCO as establishment of the off-site enhancement area has already been completed.

Interested Party	IP response to Horizon's Response to FWQ	Horizon Comments
IACC	<p>IACC still consider that this commitment needs to be secured in the DCO. Without a DCO requirement, this is entirely voluntary and Horizon could decide to re-negotiate the lease and no longer provide the off-site enhancement area.</p> <p>Certainty over provision can only be achieved through a s106 obligation to provide this land which binds the site itself.</p>	<p>The Notable Wildlife Enhancement Area as advised in the response to the FWQ submitted at Deadline 2 (4 December 2018) [REP2-375] has been secured by Horizon via a 15 year lease agreement with the landowner (expires in 2032). Management of the Notable Wildlife Enhancement Area for the duration of the 15 year lease is secured by Requirement WN12 in the draft Development Consent Order [REP2-020]. Requirement WN12 requires Horizon to:</p> <ol style="list-style-type: none"> <li>1. Prepare a management scheme for the Notable Wildlife Enhancement Area for approval by IACC;</li> <li>2. Prepare the management scheme in accordance with the management principles set out in section 7 of the Landscape and Habitat Management Strategy [REP2-039]; and</li> <li>3. Manage the Notable Wildlife Enhancement Area in accordance with the agreed management scheme for the duration of Horizon's interest in the land.</li> </ol>

Based on the anticipated construction programme, by 2032 habitat creation works will have been completed across the WNDA in accordance with the principles set out in the Landscape and Habitat Management Strategy (LHMS), therefore providing sufficient alternative habitat for any fauna displaced from the Notable Wildlife Enhancement Area. An updated version of the LHMS will be submitted at Deadline 5 (12 February 2019). In the unlikely event that the construction programme is delayed to the extent that sufficient alternative habitat is not available within the WNDA, the following Landscape and Habitat Management Strategy management principle (secured via Requirement WN12) would commit Horizon to securing appropriate management of the Notable Wildlife Enhancement Area until such time that sufficient alternative habitat has established:

*"[Management will seek to ensure that] The notable wildlife habitat enhancement site and the reptile receptor site provide suitable habitats for reptiles and other notable wildlife which have been displaced/translocated until new habitats have been created on the new landform surrounding the Power Station Site.*

On this basis, Horizon consider that the existing commitments contained in the LHMS secured by Requirement are sufficient and no additional commitments are required or justified.

**FWQ4.0.28:** The Explanatory Memorandum sets out the purpose of Article 31. Does this provide sufficient certainty for those who would be the subject of compulsory acquisition?. If not, why not?

**HORIZON'S RESPONSE TO FWQ:** Horizon considers that landowners will have sufficient certainty over what land would be subject to compulsory acquisition as the notice of treat or vesting declaration will clearly specify what part of the land or right Horizon is seeking to take. The benefit of article 31 is that it provides Horizon with the ability to just acquire a right in the subsoil, where it does not require the entire parcel of land. (For example, where it is necessary to run a cable below ground, it may be possible to acquire only subsoil rights to construct, operate and maintain that cable such that the acquisition of land and/or rights from landowners can be minimized. This also ensures that Horizon exercises a proportionate use of its compulsory acquisition powers.)

Interested Party	IP response to Horizon's Response to FWQ	Horizon Comments
IACC	IACC considers that this explanation is disingenuous as the notices referred to will not be served until acquisition is to be taken some time after any DCO is granted. Landowners should be given as much detail as possible in the BoR as to what rights will be acquired so that landowners can participate fully in the examination. Horizon should be restricting the compulsory powers to only those rights required and not seeking wide powers justified on a vague intention to narrow use of those.	<p>Question FWQ.4.0.28 referred specifically to the Explanatory Memorandum in its explanation of the purpose of Article 31 of the Development Consent Order (DCO) and the extent to which it provides sufficient clarity on the rights to be acquired.</p> <p>Horizon's position is that the explanation of DCO Article 31 in the Explanatory Memorandum does accurately portray its purpose. It explains that it seeks to limit the rights sought to those solely necessary to deliver the project in relation to subsoil rights (e.g. rights required to lay cables below ground). Further details on the rights to be acquired are also explained in the Book of Reference.</p> <p>The approach adopted by Horizon has been done so with the</p>

		<p>explicit purpose of only acquiring rights that are necessary and that avoid imprecise rights that may encompass whole parcels of land.</p> <p>Horizon therefore wholly disagrees with the comments made by IACC. The approach adopted achieves the outcome suggested by IAAC in that right sought to be required are restricted to solely those necessary.</p>
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**FWQ4.0.72:** WN15 and WN16 – These requirements control the number of parking spaces proposed during construction and operation. Can the Applicant: explain why this is worded as a maximum rather than a specific number? Explain why there is no minimum number? indicate where in the DCO, the design and layout of the car parking, (including provision of disabled parking spaces; electric vehicle charging points; lighting; drainage; provision of petrol/oil interceptors or other methods of pollution control etc.) is detailed and secured?? Is IACC, as Local Highways Authority, content that this refers only to a maximum number of spaces rather than a specific number of spaces? Is IACC, as Local Highways Authority, satisfied that there is a mechanism by which it will be able to ensure approval of the design and layout of the car parking? If so, how?

**HORIZON'S RESPONSE TO FWQ: Maximum provision**

In respect of car parking provisions, unless otherwise agreed with IACC:

- Requirement WN15 specifies a maximum of 1,900 car parking space within the WNDA during the construction of the Wylfa Newydd DCO Project; and
- Requirement WN16 specifies a maximum of 700 permanent car parking spaces during the operation of the Wylfa Newydd DCO Project, and 1,000 temporary spaces for outage events (as amended by the draft DCO (Revision 3.0) submitted at Deadline 2 (4 December 2018) [WN0902-HZDCO-PAC-REP-00043].

The number of car parks required is based on the trip generation analysis, which is explained in Appendix C2-4 - DCO Transport Assessment [APP-101]. The actual number of car parks provided at a given time will be phased according to the demand at that point of the construction and operational timetable (for example, operational parking requirements will increase during outage testing). As such, Horizon does not consider that minimum requirements are necessary, as it is directly in Horizon's interest in terms efficient construction delivery and operational requirements to ensure that there is adequate provision of parking at any point in time.

**Design Details**

For construction, Horizon is not proposing to submit detailed design drawings for car parking as these will be temporary facilities only. However, Requirement WN15 requires Horizon to ensure that parking provision does not exceed 1,900 on site. For operation, details of operational car parking would be provided as part of the detailed design drawings submitted to IACC for approval under Requirement WN3. Designs submitted under Requirement WN3 must be prepared in accordance with the principles in the Design and Access Statement (Volume 2 – Power Station Site) [APP-408] which includes principles relating to:

- lighting design;
- drainage;
- location of car parking; and
- electric vehicle charging points.

Interested Party	IP response to Horizon's Response to FWQ	Horizon Comments
IACC	The IACC does not accept that Horizon's response provides any comfort that suitable levels of parking provision will be provided. Stating that it is in Horizon's interest to provide these gives no enforceable level of provision which the IACC can rely upon and provision cannot be considered to be secured.	<p>The parking numbers provided have been based on a maximum level. In discussions with IACC and WG the understanding is that they have always insisted on this approach to encourage as much travel by sustainable modes as possible.</p> <p>The agreed position on parking provision is included at paragraph 5.10.1 of the Wylfa Newydd CoCP (as submitted at Deadline 5 (12 February 2019):</p> <p><i>5.10.1: 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</i></p>

		<p><i>parking).</i></p> <p>Further meetings with WG and IACC are scheduled for 15<sup>th</sup> and 16th January 2018 respectively in respect of mode share targets, but these are unlikely to significantly influence the approach agreed in the Wylfa Newydd CoCP.</p>
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**FWQ4.0.87:** PR5 Operational parking –includes cycle parking – should this be retitled operational car and cycle parking? The parking spaces are stated as a maximum rather than a specific number, is this acceptable to the IACC/Highway Authority? Should a minimum number be defined? The maximum figure given is 1,900 – however the Planning Statement [8.1] (paragraph 4.3.16) states that it would provide parking for 1,900 cars, 55 minibuses and 35 motorcycles –clarify whether the number of parking spaces proposed includes or excludes the parking for minibuses and motorcycles? Unless details are provided as part of either PR2 or PR3 the design/layout of the parking including drainage, lighting, disabled parking spaces and electric vehicle charging points does not appear to need to be submitted and approved by IACC. Does IACC as Local Highways Authority, wish to comment?

**HORIZON'S RESPONSE TO FWQ: Title of Requirement PR5**

This is an error in the title and reference to cycle parking has been inserted into the title of Requirement PR5 as part of the updated draft DCO (Revision 2.0) submitted at Deadline 1 (13 November 2018) [REP1-004].

**Maximum provision**

In respect of car parking provisions, Requirement PR5 specifies a maximum of 1,900 car parks (including spaces allocated for disabled operational staff). The number of car parks required is based on the trip generation analysis, which is explained in Appendix C2-4 - DCO Transport Assessment. The actual number of car parks provided at a given time will be phased according to the demand at that point of the construction timetable. As such, Horizon does not consider that minimum requirements are necessary, as it is directly in Horizon's interest in terms efficient construction delivery to ensure that there is adequate provision of parking at any point in time. Further, workers will be required to utilize transport facilities provided through the Wylfa Newydd DCO Project through the Workforce Management Strategy and the Code of Conduct.

**Clarification of parking provision**

The parking figures provided in the Planning Statement [APP-406] are correct. An amendment to PR5(1) has been inserted into the updated draft DCO (Revision 2.0) submitted at Deadline 1 (13 November 2018) [REP1- 004]:

**PR5 Operational car and cycle parking**

(1) The number of car parking spaces to be provided and available during the operation of the Park and Ride facility must not exceed 1,900 including spaces allocated for disabled operational staff but excluding spaces for minibuses and motorcycles, unless otherwise

approved by IACC.

### **Approach to design**

*Construction in accordance with approved plans under the DCO (Requirement PR2)* As part of the draft DCO application, Horizon submitted site layout, lighting and drainage plans for the Dalar Hir Park and Ride facility (see WN0902-HZDCO-ADV-DRG-00033 to 00038. These plans are marked as for approval as part of the draft DCO and show:

- the layout of the parking areas, locations of charging points and proposed surfacing;
- landscaping designs;
- pedestrian areas;
- building locations and designs;
- lighting plans (locations and lux levels);
- connections from the site to the public highway;
- surface and foul water drainage; and
- connections to existing infrastructure.

Under Requirement PR2, Horizon must undertake construction of the Park and Ride facility in accordance with the detailed design drawings identified in Schedule 2 of the draft DCO. (As noted above at **FWQ4.0.84**, updated plans have been submitted at Deadline 2 (4 December 2018) [WN0902-HZDCO-PAC-REP-00043]) Horizon considers that it is appropriate that IACC does not need to approve these plans as they have been approved through the DCO process; however, IACC would have approval rights in respect of any amended or new plans under Requirements PR3 and PR4.

*Construction in accordance with plans approved by IACC (Requirements PR3 and PR4)* Under Requirement PR3, Horizon must, prior to any construction commencing, submit detailed designs for all buildings and structures comprising the Park and Ride facility to IACC for approval. These designs must be in accordance with the principles in the set out in section 3 of the Design and Access Statement (Volume 3 (Part 2)) which include principles relating to:

- layout and design of the carpark (including direction of vehicles, location of staff parking and pedestrian areas, avoidance of watercourses and use of permeable materials);
- landscaping and building design;

- drainage treatment;
- incorporating low energy design into the Park and Ride facility; and
- lighting design.

Requirement PR3 therefore ensures that the key design requirements (including layout and design, drainage and lighting of the car park) must be incorporated in the detailed designs that Horizon bring forward. These detailed designs must then be approved by IACC.

Interested Party	IP response to Horizon's Response to FWQ	Horizon Comments
IACC	The IACC does not accept that Horizon's response provides any comfort that suitable levels of parking provision will be provided. Stating that it is in Horizon's interest to provide these gives no enforceable level of provision which the IACC can rely upon and provision cannot be considered to be secured.	<p>The parking numbers provided have been based on a maximum level. In discussions with IACC and WG the understanding is that they have always insisted on this approach to encourage as much travel by sustainable modes as possible.</p> <p>The agreed position on parking provision is included at paragraph 5.10.1 of the Wylfa Newydd CoCP (as submitted at Deadline 5:</p> <p><i>5.10.1: 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).</i></p> <p>Further meetings with WG and IACC are scheduled for 15<sup>th</sup> and 16<sup>th</sup> January 2018 respectively in respect of mode share</p>

		targets, but these are unlikely to significantly influence the approach agreed in the Wylfa Newydd CoCP.
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**FWQ10.1.7:** Some workforce accommodation is proposed to be drawn from the headroom available from Caravan and Camping accommodation. Can the applicant: (a) Clarify whether the headroom numbers stated are only from permanent pitches (i.e. static/mobile caravans and permanently erected tents) or does it include temporary pitches (i.e. where a caravan would need to be brought onto site or a tent pitched)? (b) If the number does include temporary pitches can the applicant provide figures for temporary and permanent pitches and for the permanent pitches indicate how many of those would be in a caravan or static/mobile home and how many would be in a tent. (c) Provide examples of other projects where it was considered acceptable to use tents to accommodate workers? (d) Reference is made to workers potentially bringing their own caravans. Looking at other similar projects elsewhere is there any data as to indicate how many this could be and where they would locate?

**HORIZON'S RESPONSE TO FWQ:**

(a)

The headroom numbers include both static and touring pitches for caravans but exclude tents. The estimates of capacity and headroom in the Workforce Accommodation Strategy ("WAS") and assessed in the Environmental Statement at Chapter C1 Project-wide effects - Socio-economics were taken from Welsh Government data (Welsh Government. Summary of Wales Bed stock Data: Situation as at March 2013. [Online].

<http://gov.wales/docs/caecd/research/131011-accommodation-bedstockmarch-2013-en.pdf> which identified 29,000 tourist bed spaces in Anglesey and 124,500 in all of Gwynedd (of which around 32,500 were in the Key Socio-economic Area (KSA)). Of these, 45,430 were estimated to be in caravans (both static and touring) – 22,500 on Anglesey and 23,000 on the mainland within the KSA. This is broadly consistent with the bed stock survey that forms part of the evidence base for the JLDP (IACC. Topic Paper 9: Tourism. 2015. [Online]. <http://www.anglesey.gov.uk/Journals/2015/02/13/g/v/t/Tourism-Topic-Paper-February-2015.pdf>. These documents include both touring and static caravans but did not produce a split between them.

(b)

Since the Draft DCO application was submitted, IACC has shared some additional data with Horizon that confirms the number of bed spaces is still broadly similar to the numbers presented in the WAS and above. It also indicates that static caravans account for approximately 60% of the bed spaces, with the remainder being touring and seasonal pitches. No workers are assumed to be using



tents.

(c)

No workers are assumed to be using tents and we have not reviewed whether other projects have considered it acceptable to use tents to accommodation workers.

(d)

The latest figures for Hinkley Point C (March 2018) show around 14% of workers are using caravans but it does not provide a breakdown between static and touring caravans or information on location.1.1.6 Heathrow's Terminal 5 construction had a peak workforce of around 8,000 and recorded around 260 workers bringing touring caravans ("Heathrow's T5: History in the Making" Doherty, 2008, p125). Horizon expects workers who bring caravans to use properly licensed sites. It will use the Workforce Accommodation Management Service, which all personnel must register with (secured by the Workforce Management Strategy) to achieve this and the Housing Fund which is secured in the Draft DCO s.106 agreement can be used if required by IACC to monitor and enforce the worker accommodation including unlawful caravan sites.

Interested Party	IP response to Horizon's Response to FWQ	Horizon Comments
IACC	(a) The IACC confirm that the capacity assessed is permanent pitches. It does not include temporary pitches. The Accommodation Bedstock Survey commissioned by IACC showed that while there are some 26,000 bedspaces in the caravanning and camping sector (excluding tents), there are only 164 static caravans and 893 touring caravan pitches available to let by site operators: the remainder are owned by private individuals, and there can be no guarantee that these will become available for Wylfa Newydd workers. (The bedspace numbers also assume that 4 people share one caravan, which may be the case for family holidays, but is unlikely to be acceptable for unrelated adults.)	As set out in Horizon's response to IACC's LIR [REP3-004] at paragraph 6.10.1 of its LIR [REP2-068] IACC acknowledges that Horizon's assumed total use of tourist accommodation would be acceptable. (a) With respect to availability of caravan sites, Paragraph 8.4.7 of Horizon's response to IACC's LIR [REP3-004] highlights that private owners may wish to make their accommodation available to workers. Horizon is confident its plan, monitor and manage approach is capable of dealing with demand for

(b) IACC can also confirm that no worker is assumed to be using tents. The IACC's assessment of capacity also excludes short term 'seasonal' pitches (less than one month) as these would not be available for the workforce. Tourism Accommodation is dealt with in detail in section 5.17 of the IACC's Housing Chapter of the LIR and Caravan Accommodation is dealt with in detail in section 5.18.

(c) No worker is assumed to be using tents. This is unacceptable. The IACC have obtained recent data from Hinkley on breakdown of accommodation (including caravans). See Table 18 in the IACC's housing Chapter of the LIR. This corroborates Horizon's analysis. The IACC however disagree with Horizon's approach to housing workers in caravans. Horizon should identify and assess suitable sites and these should be made available through the WAMS (i.e. and not left to the tourism sector to accommodate workers). (see LIR Housing Chapter section 4.1.1 and 5.18). As the WAMS has no powers to require workers to use any particular form of accommodation, identifying suitable and 'approved' caravan sites is the only way to monitor and enforce the potential use of unlicensed or unsuitable sites.

caravan bedspaces. The peak of demand is several years into the Wylfa Newydd DCO Project and will be monitored and if any issues arise the Housing Fund, secured in the Draft DCO s.106 Agreement [REP3-042], can be used to address them.

(b) Paragraph 8.4.9 of Horizon's response to IACC's LIR [REP3-004], acknowledges IACC excludes seasonal pitches from its assessment of capacity and highlights this methodology is inconsistent with doing an assessment in the summer peak.

(c) As set out in the WAS, [APP-412] the WAMS will include working with accommodation providers to ensure there is a sufficient supply of appropriate accommodation for workers. This will include providing workers with details of accommodation available to the workforce, including suitable caravan sites. In addition, the Draft DCO s.106 Agreement [REP3-042] includes a commitment to funding the Worker Accommodation Annual Contribution which will be applied towards the cost of monitoring and mitigating potential adverse effects including

		enforcement issues such as unlawfully sited caravans.
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**FWQ10.2.6:** Planned outages will require an additional 1,000 workers every nine months – how many of these would be home-based workers?

**HORIZON'S RESPONSE TO FWQ:** The outage workforce will be provided by contract organisations and these contracts will not be in place until the later stages of the project, hence Horizon cannot provide a definitive answer. Typically, practice on power stations of this nature is for organisations to draw people from a wide catchment area both locally and UK wide, with some specialists from outside of the UK. Horizon therefore expects that the vast majority of outage workers would be non-home based.

Interested Party	IP response to Horizon's Response to FWQ	Horizon Comments
IACC	This is the first time that Horizon have stated that the 1,000 additional workers will be from contractors and likely to be pulled from wider afield. IACC would still like to know if local labour can be trained up to take part. The IACC would also like to know how the 1,000 workers every nine months will operate in practice. Anglesey and Gwynedd has vast experience in the nuclear industry from hosting Wylfa A and Trawsfynydd, therefore, are there opportunities for staff from these sites to perform the outage roles? The IACC also has a number of questions regarding these outage roles. For example will they require hotel rooms? How long will they be required to work on site? Is this a relatively short term activity or does it last for a year or more? The IACC acknowledges that some of the jobs relating to these outages will be highly skilled	The contract organisations supporting an outage have a natural incentive to maximise the level of local personnel used and are expected to do so, however, for many tasks they are likely to use resources from their companies sourced from locations across the UK. The primary reasons for this is the short duration of the outages and the need for personnel to be suitably qualified and experienced (SQEP) and it being difficult to keep people suitably trained unless they continue to do similar work at other Nuclear plants across the UK. The position outlined is in line with the practice at all UK nuclear power stations and is the same as the position for Wylfa A outages. For example, the EDF fleet utilises teams of outage support specialists derived from a number of organisations that move from one station outage to the next on a rolling basis. Typical outage work is maintenance of specialist equipment (such as reactor internal cooling pumps, fine motion control

and specialized roles, however it is not clear why this will be "the vast majority". The agreed goal of maximizing local employment applies to both specialist and non-specialist roles during outages and further information on the skills required for these roles has been requested and is still needed in order to assess the opportunities and to consider impacts and mitigation.

rod drives, turbine/generator) which is often provided by the equipment suppliers personnel. Other specialist contractors perform Nuclear fuel movements, In-vessel inspections and In-Service Inspections and specialist inspections. More general mechanical fitting (removal and repair of equipment), rigging, scaffolding can be provided by other access contractors.

It is likely that for areas of labour which are transferable from other industries such as scaffolding, welding, rigging etc. local labour will be used.

Due to the brief nature of the outage many of the more broad skill sets (scaffolders, insulators, painters, labourers, etc) that don't require specialized training are taken from local supply but it gets exhausted requiring broader supply. The number of 1000 is indicative based on UK experience and will be refined once the outage work scope is fully developed. The workforce is typically mobilised to the site in the week before the outage and demobilised in the week following outage completion.

It is possible that some personnel from Wylfa A and Trawsfynnyd operations personnel may be used if available and if they have suitable skills.

		<p>It is expected that the additional personnel will require hotel rooms local to Anglesey and would provide revenue to local hotels and restaurants.</p> <p>The workforce is typically mobilised to the site in the week before the outage and demobilised in the week following outage completion with an assumed outage duration of 30 days.</p> <p>Therefore for the bulk of the personnel outages will be a short-term activity of typically a month duration, for a small planning team of the order of 5 people the activity could last 9-12 months.</p> <p>In considering the specialised nature of the outage roles required, the short duration of the outage works themselves and the need for the workforce to maintain a suitable level of training through transient work on other nuclear power stations it is evident why “the vast majority” of personnel are likely to be non-home based workers.</p>
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**FWQ10.4.2:** Paragraph 1.5.89 of the ES [APP-088] refers to deterioration of tourism accommodation due to long term occupancy, reduced maintenance and lower expectations for accommodation. What pro-active measures are proposed to minimise any degradation of this stock and to ensure that when it is vacated by workers it would be of a standard that is suitable for tourism lets?

**HORIZON'S RESPONSE TO FWQ:** Degradation of stock was included in the ES at the request of local stakeholders. As set out in the remainder of Paragraph 1.5.89 of the ES, it is not a likely significant impact. As shown in Table 6.2 of the Workforce Accommodation Strategy, the supply of tourist accommodation is large compared to the demand. Across the Key Socio-economic Area (KSA) there are 6,950 bedspaces in serviced accommodation, 6,400 in self-catering and over 45,000 in caravans. This compares to peak demand of 450 in serviced and self-catering and 650 in caravans. As a result, it is unlikely that any individual accommodation would be used continuously and providers would only let a proportion of their accommodation to workers. This is supported by responses to the IACC Bedstock Survey. This found that larger operators were more interested in letting to workers than smaller ones (where workers could take all the capacity). Finally, even if some accommodation is used continuously, it would be a very small proportion of the total supply and the effects of any "degradation" would not be significant in the context of the overall tourism market. For the reasons set out above it is not envisaged that any pro-active measures are required to ensure that accommodation once vacated by workers would be of a standard that is suitable for tourism lets.

Interested Party	IP response to Horizon's Response to FWQ	Horizon Comments
IACC	The IACC disagree with Horizon's assumption on supply of tourism accommodation. These figures are vastly exaggerated. See Section 5.17 and 5.18 of the Housing Chapter of the LIR. Horizon over-estimates 'spare capacity' in the sector by using all-Wales occupancy data, which is lower than that for Anglesey. This is compounded by the failure to apply an access moderator to the self-catering sector, which has the highest peak-period occupancy rates (88%). Horizon's calculations are also drawn from the whole Key Socioeconomic Area (KSA) and utilise accommodation	Horizon does not consider that spare capacity is relevant to this issue. The key point is that workers will take only a small proportion of total stock, and therefore the risk of significant degradation of total stock is low.  Furthermore, paragraph 6.10.1 of IACC's LIR [REP2-068] acknowledges Horizon's assumed total use of tourist accommodation would be acceptable. Horizon's response to IACC's LIR [REP3-004] outlines a number of factual errors in IACC's analysis of the capacity of tourist accommodation with which Horizon disagrees

stock data drawn from both Anglesey and the Menai Mainland (table 4). This inflates the estimated number of bed-spaces and amount of stock available in each sector by 25,636 (44%), yet Horizon's calculations estimate that this will only play a very minor role in workers' accommodation choices (e.g. 8% of caravan sector). Paragraph 5.17.8 of the LIR Housing Chapter highlights a transference of accommodation out of the tourism sector, which will degrade the accommodation stock.

(see paragraphs 8.4.1-8.4.15).



**FWQ11.1.1:** Paragraphs 4.3.34 and 4.3.37 of the Planning Statement [APP-406] indicate that it would take 18 months to construct the proposed Park and Ride facility and 15 months to construct the Logistics Centre. Can the applicant:

- (a) Advise why they will take this length of time to construct?
- (b) What interim arrangements will be in place to manage construction vehicles whilst the logistics centre is under construction? And
- (c) Whether the transport modelling took account for these additional vehicle movements before these facilities comes on- line?

Does the IACC/Highways Authority have any comments to make?

**HORIZON'S RESPONSE TO FWQ:**

(a)

The programme period of 18 months to construction the Park and Ride facility and 15 months for the Logistics Centre incorporates the design and construction phases for each facility and has been based on a phased approach aligned to project demands in terms of the anticipated ramp up of workforce numbers and construction vehicle movements.

(b)

Before the Logistics Centre is open construction vehicles will travel direct to each work site associated with the Wylfa Newydd DCO Project. It is anticipated that Horizon will implement interim traffic management arrangements including control and management of delivery slot times for the Wylfa Newydd Development Area and Associated Development. Horizon will work closely with the Project Management Contractor and wider project supply chain to deconflict deliveries to ensure deliveries are managed in line with the transport strategy presented in the Draft DCO [REP1-005] application.

More specifically, paragraphs 5.2.1 to 5.2.6 of the Logistics Centre sub-Code of Construction Practice [APP- 414] indicate the technology which Horizon will employ during the construction period of the Wylfa Newydd DCO Project in order to manage construction vehicles before and after the Logistics Centre becomes operational.

These management arrangements will include a deliveries management system, employing a Distribution Management Asset Tracking System (DMATS) to track construction vehicles and prebook delivery slots to the site.

The text provided in these paragraphs is now also incorporated into the revised version of the Wylfa Newydd Code of Construction Practice (submitted at Deadline 2 (4 December 2018)) to confirm that these arrangements will be in place before the Logistics Centre becomes operation.

(c)

The transport modelling presented in the Transport Assessment [APP-101] assumes the Logistics Centre and Park and Ride facilities are open. This is described in paragraph 7.2.1 of Appendix G Strategic Traffic Model Method Statement [APP-108] of the DCO Transport Assessment. The purpose of the Logistics Centre is to hold and release construction vehicles in controlled time intervals and therefore regulate construction vehicle deliveries throughout the working day. The Logistics Centre will therefore not change the total number of vehicle movements to the WNDA or the Associated Development sites. Overall, construction traffic volumes prior to the opening of the Logistics Centre opening are expected to be the same or lower than those reported in the Transport Assessment. This is because construction activity increases gradually in the early years of the Project as shown in Figure 7-6 of DCO Transport Assessment.

In addition, before the Logistics Centre opens construction vehicles will not be required to travel the additional distance from Junction 3 (which provides access to the A5025 and the Project work sites) and Junction 2 (which provides access to the Logistics Centre). This means that before the Logistics Centre opens, this distance will not be driven and hence the overall distance driven by construction vehicles will be lower.

Interested Party	IP response to Horizon's Response to FWQ	Horizon Comments
IACC	<p>a) Further information is required on these timescales. IACC does not accept the early years phasing strategy and the lateness of the delivery of the Park and Ride and Logistics Centre.</p> <p>(b) It is anticipated that Horizon will implement interim traffic management arrangements..."</p>	<p>a) Horizon has reviewed the construction programmes stated for both the Park and Ride and Logistics Centre and the periods reflected in Horizons response remain as stated. The 18 month and 15 month periods stated in the response includes allowances for the following:</p> <p>(i) the need to secure discharge of DCO Requirements,</p> <p>(ii) undertaking associated procurement, design and contract</p>

<p>This is an inadequate response. Horizon needs to commit to providing interim traffic management arrangements which need to be agreed with IACC and Welsh Government in advance of commencement of construction.</p> <p>More clarity needed in relation to the DMATS arrangement before the Logistics Centre is completed. Section 5.2 of the Logistics Centre CoCP describes the deliveries management and the DMATS, but this is based on vehicles registering and waiting at the Logistics Centre. Proper control is needed over where vehicles register and wait in the absence of the Logistics Centre?</p> <p>(c) Whilst the transport modelling has taken account of comparable/higher levels of traffic, there isn't a specific assessment of the traffic flows and impacts on the road network in the interim period before the completion of the Park and Ride and Logistics Centre. This further emphasizes the need for an Early Years Strategy as per the IACC's Traffic and Transport LIR chapter.</p>	<p>placement and</p> <p>(ii) construction of the facility including commissioning and testing of systems required to support the operation of both facilities.</p> <p>Horizon consider that with the current levels of constraints being considered in the CoCP and sub-CoCP's related to these sites, there is little or no opportunity available to consider earlier delivery of the facilities.</p> <p>b) Updated versions of the Wylfa Newydd CoCP and Logistics Centre sub-CoCP have been submitted at Deadline 4 (17 January 2019) and contain more information on construction traffic management and the DMATS.</p>
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**FWQ11.1.2:** Paragraph 6.2.12 of the Planning Statement [APP-406] refers to a proposed workforce of 850 at the Power Station Site – on this basis why is it necessary for 1,100 permanent parking spaces as proposed by WN16 of the dDCO [APP- 029] and how does this fit with the statement at paragraph 5.3.7 of the WNCOP [APP-414] that states that parking spaces at the Power Station Site will be restricted to encourage the use of Park and Share and shuttle buses and reduce the number of private vehicles being driven to the site?

Does the IACC/Highways Authority have any comments to make?

**HORIZON'S RESPONSE TO FWQ:**

(The Draft DCO and the Planning Statement contained errors in respect of the car parking spaces cited. Horizon proposes 700, rather than 1100, permanent car parking spaces. This has been corrected in the Draft DCO submitted at Deadline 2 (4 December 2018), in which Requirement WN16 now refers to:

- a) 500 permanent and 200 temporary spaces in the southern car park
- b) 800 temporary spaces in the northern car park
- c) 200 permanent spaces at the simulator and training car park

As noted at paragraph 5.1.58 of the DCO Transport Assessment, the Wylfa Newydd Development Area (WNDA) (excluding the simulator and training building, which is discussed further below) will have provision for 500 car parking spaces for workers during the operational phase of the project. During periods of outage, there will be a further 1,000 temporary car parking spaces made available. This level of car parking matches the assumed number of workers during the operational phase assuming car sharing and an average of 1.5 workers per car. Paragraph 7.7.2 of the DCO Transport Assessment states that there will be up to 850 operational workers at the Wylfa Newydd Development Area on any one day with 100 of these working on a shift basis and the remaining 750 working office hours. A further temporary 1,000 workers are expected during an outage. This means that there are 500 car parking spaces for approximately 750 daily workers which means that some workers will be required to car share with an expected average number of 1.5 workers per car. This assumption is described in paragraph 2.6.2 of Appendix A of Appendix G – Strategy Traffic Model

**Methodology.** This approach is in line with the requirements of the Operational Travel Strategy, which are set out at paragraph 5.3 in the Wylfa Newydd Code of Operational Practice [APP-421]. The Operational Travel Strategy aims to encourage operational staff and visitors to travel to the site by sustainable modes, in order to mitigate the anticipated increase in motor traffic created by the development on the local road network. Sustainable travel will be achieved by encouraging and promoting car sharing, using local bus services, cycle parking and key walking routes. Please note that paragraph 5.3.7 of the Wylfa Newydd Code of Construction Practice relates to the construction, rather than operational phase. The Park and Ride facility would not operate during the operational phase, and likewise Horizon does not propose the use of shuttle buses during the operational phase.

#### Simulator and training building

As the simulator and training building is located some distance from the Power Station Site, it has been provided with its own car park of 200 parking spaces for those workers running and attending the training facility. This provision has been calculated on the requirements of the building, with a contingency in the number of car parking spaces provided to accommodate people arriving and departing while training is ongoing.

The inclusion of the car park spaces associated with the simulator and training building brings the total number of permanent car parking spaces during the operational phase of the Project to 700.

Interested Party	IP response to Horizon's Response to FWQ	Horizon Comments
IACC	The IACC notes the correction provided by Horizon. However, the IACC seeks clarification on how will the temporary parking spaces be managed so they are not used as permanent spaces. Further to this, Horizon shall confirm if the temporary parking spaces will be removed following each outage period.	Temporary car-parking available during outages can be secured and only opened for periods required to support outages. It is not cost effective to remove and reinstate car parking at the end/beginning of each outage. This would not be environmentally or commercially viable.

	<p>As per the IACC’s concerns with the car sharing strategy during the construction phase of the project, the IACC believe that the provision of additional Park &amp; Share (P&amp;S) facilities at strategic locations would mitigate potential fly-parking and enable more sustainable travel patterns during the Operational phase to the Wylfa Newydd site.</p>	
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**FWQ11.1.5:** Concerns have been raised in a number of the RR regarding the fact that the Menai and Britannia bridges occasionally have to shut.

Can the IACC/GCC provide details of:

- (a) How frequently the Menai and Britannia Bridges have shut over the last five years?
- (b) How often both bridges were shut at the same time?
- (c) What measures are currently in place when a bridge shuts e.g. how and where is traffic diverted or held and how does this effect travel times/congestion?
- (d) The structural state of both of the bridges and whether any maintenance/repair work is planned during the construction phase of the project which would result in either partial or full closure of either of the bridges?

Can the applicant confirm:

- (a) Whether bridge closures were factored into their transport assessment/modelling?
- (b) What measure they propose during construction and operation to manage traffic if one or both of the bridges has to close?

**HORIZON'S RESPONSE TO FWQ:**

This answer refers to the latter part of the question above - "can the applicant confirm" sections (a) and (b) - only.

(a)

The temporary closure of the Menai Bridge and/or Britannia Bridge is a rare occurrence and the traffic modelling of the Wylfa Newydd DCO Project has not considered this eventuality.

(b)

The temporary closure of one or both bridges would be expected to be classified as a traffic incident. Section 5.5 entitled 'Traffic Incident Management' of the submitted Code of Construction Practice, [APP-419] states the role of Horizon in managing Wylfa Newydd DCO Project traffic during an incident (such as the closure of a bridge). This includes providing key points of contact in the instance of an incident and relaying incident-related information to construction traffic operators.

Following discussions with stakeholders, Section 5.5 of the Wylfa Newydd CoCP, as updated and submitted at Deadline 2 (4 December 2018), has been replaced with the following text in relation to Horizon's involvement in a traffic 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."

Interested Party	IP response to Horizon's Response to FWQ	Horizon Comments
IACC	Horizon has added text to the Section 5.5 of Code of Construction Practice which includes the identification of a site based delivery management team which will provide a point of contact; the control of HGVs on the network; a communications protocol; and holding HGVs and buses at appropriate locations.	As stated in the CoCP, Horizon has no authority in the event of a traffic incident on the public highway network. As identified by IACC, further details on how Horizon will respond to an incident on the highway network were provided in version 2 of the Wylfa Newydd CoCP submitted at Deadline 2 (4 December 2018) [REP2-031].



	<p>Further measures could include liaison with IACC, Welsh Government and NWP to identify traffic incident management protocol options and should be secured via an IACC approved Traffic Incident Management Plan.</p>	<p>At the request of the North Wales Police (NWP) during pre-application discussions, a Traffic Incident Management Plan was not progressed as part of the Draft DCO application. Wylfa Newydd DCO Project related traffic is to adhere to all instructions given by the NWP in the event of an incident.</p>
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**FWQ11.1.6:** The proposal is that the majority of freight would be moved by sea using the MOLF. Could the applicant advise if the TA includes any modelling for times when the MOLF may not be available due to bad weather/storm damage and in particular whether this would result in an increase in traffic movements on the road network and the impact that this would have.

**HORIZON'S RESPONSE TO FWQ:**

Whilst the question is not directed to Horizon as the applicant, the following response is provided by Horizon at this stage:

A Request for Non-Material Change (number 2 [AS-021]) to increase the upper daily limit for marine vessel movements from four to 16 movements per day, 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 Code of Construction Practice, ensuring the total number of construction vehicle movements to the WNDA does not exceed the assessed threshold.

A supply of construction materials will be maintained on site in-line with good construction practice and commercial requirements. This will assist in minimising the impact of adverse weather on the MOLF.

Interested Party	IP response to Horizon's Response to FWQ	Horizon Comments
IACC	Horizon has requested a non material change for an increase from 4 to 16 vessel movements per day to support programme recovery but specifies that temporary additional deliveries by road would be within the limits set out in the CoCP – not exceeding a maximum of 40 HGV deliveries (80 movements) per hour and 160 HGV deliveries (320	<i>Version 2 of the CoCP submitted at Deadline 2 includes the addition of lower maximum HGV caps along the A5025 in the early years (before the Off-Line Highway Improvements are open) as follows:</i> <ul style="list-style-type: none"><li>• 2,500 movements per direction, per month</li><li>• 160 movements per direction per day</li><li>• 22 per direction per hour</li></ul>

movements) per day.

In the technical report titled 'Request for Non-Material Change no.5 – HGV Movements' (November 2018 [Rev 1]) which supports the proposed change it is stated in paragraph 1.1.2 that the extension of the delivery window is to provide a more flexible logistics management arrangement. Paragraph 2.2.4 of the document states that the total number of HGVs would not change as a result of the extended delivery window. In paragraph 2.3.5 it is stated that the hours extension would provide the opportunity to extend the current delivery programme and to potentially deliver the Project ahead of schedule which would reduce the length of time that the community is exposed to construction related effects.

IACC's response to the consultation is that it would seek to prohibit this proposal until the completion of the A5025 offline improvements. It is noted that there is no assessment of environmental effects of the proposal, that the proposal will affect the amenities of local communities into the evening and

*The Request for Non-Material Change no.5 – HGV Movements does not increase total HGV movements, therefore it is unclear why IACC seek to prohibit the extension in the HGV delivery window until the completion of the A5025 offline improvements.*

Horizon has responded to IACC's comments regarding Horizon's Requests for Non-Material Changes in the consultation responses submitted at Deadline 4 (17 January 2019).

AADT figures are Annual Average Daily Trips. These therefore provide a figure which is based on the annual estimated traffic per year, divided by 365 days.

The HGV caps contained in the Wylfa Newydd CoCP (an updated version of which has been submitted at Deadline 4 (17 January 2019) represent maximums per hour or per day, based on the peak activity which occurs in the peak quarter of the peak year and also assumes the a 12 hour delivery window and 5 day week.

Therefore the AADT figures will always be lower than the maximums quoted in the CoCP.

	<p>on a Saturday, therefore it is misleading to suggest that the proposal would reduce exposure to construction related effects.</p> <p>The IACC seeks clarification on the HGV caps identified in the CoCP as they do not reflect the HGV AADT figures for the Project as set out in Appendix C2.03.</p>	
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**FWQ11.1.10:** The traffic modelling/assessment is predicated on the basis that the MOLF will enable delivery of the majority of materials direct to the site. Is there any modelling/contingency that deals with the potential increase in vehicular movements should construction of the MOLF be delayed. In particular would the road network have the capacity to take any additional movements that may result and if there is an increase in movements how would this affect local residents?

**HORIZON'S RESPONSE TO FWQ:**

The construction of the MOLF will require the delivery of materials by road using Heavy Goods Vehicles (HGVs). The estimated number and profile of these HGV movements along the A5025 is presented in Figure 7-6 of the DCO Transport Assessment.

If the delivery of the MOLF were to be delayed then this would mean that the number of HGVs travelling to the WNDA associated with the construction of the MOLF would be spread over a longer period.

Should the MOLF opening be delayed, any additional construction vehicles bringing materials to the WNDA by road will be managed so as not to exceed the daily cap, as specified in paragraph 5.4.13 of the Wylfa Newydd Code of Construction Practice, of 160 construction vehicle deliveries per day to the WNDA.

To show the likely impact of a delay in delivering the MOLF, the potential impact of a six-month delay in delivering the MOLF has been assessed based on the following assumptions:

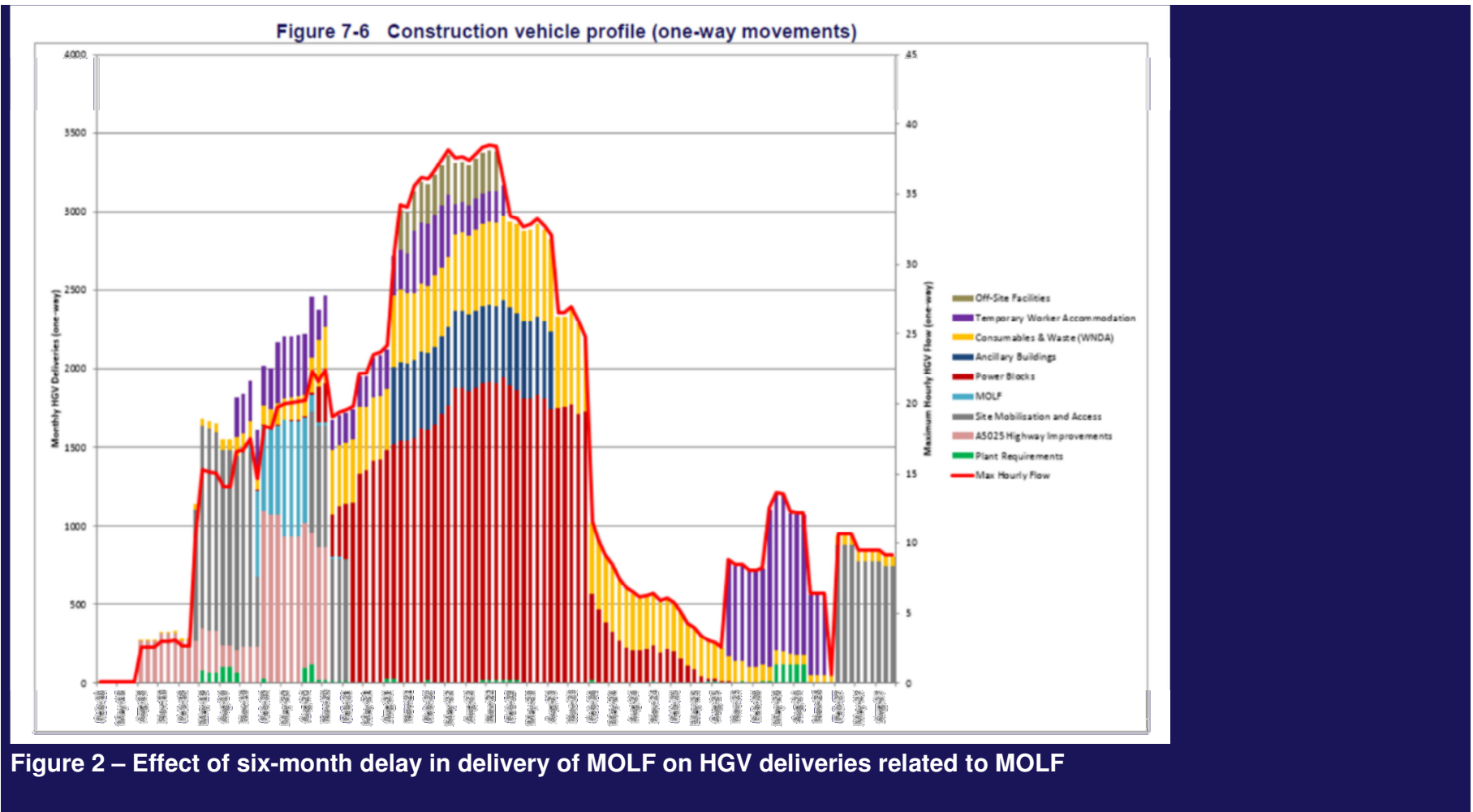
- No change to the start date of MOLF construction.
- End date of MOLF construction delayed by six months beyond that assumed in the Draft DCO application.
- Total number of construction vehicles required to build the MOLF is unchanged.
- General shape of HGV delivery profile kept consistent between baseline and scenario with a six-month delay.
- The resulting impact on the delivery profile of HGVs is shown in Figures 2 and 3 below. These figures show:
- The peak number of construction HGVs associated with the MOLF decreases – falling from 745 vehicles per month in the Draft DCO

submission to 414 per month with a six-month delay (see Figure 2).

- For overall HGV movements, for months 23 to 31 inclusive, there are fewer vehicles per month when the MOLF is delayed (because the HGVs associated with the MOLF are spread over a longer period) (see Figure 3).
- This reverses in months 32 to 42, when there are more overall HGVs per month when the MOLF is delayed. The total number of HGVs is though similar to the total assessed in the Draft DCO (approximately 3,500 HGV deliveries per month) (see Figure 3).

Overall, this assessment shows that delaying the delivery of the MOLF by six months does not affect the conclusions of the transport analysis presented in the Draft DCO application.

**Figure 1 – DCO Transport Assessment**



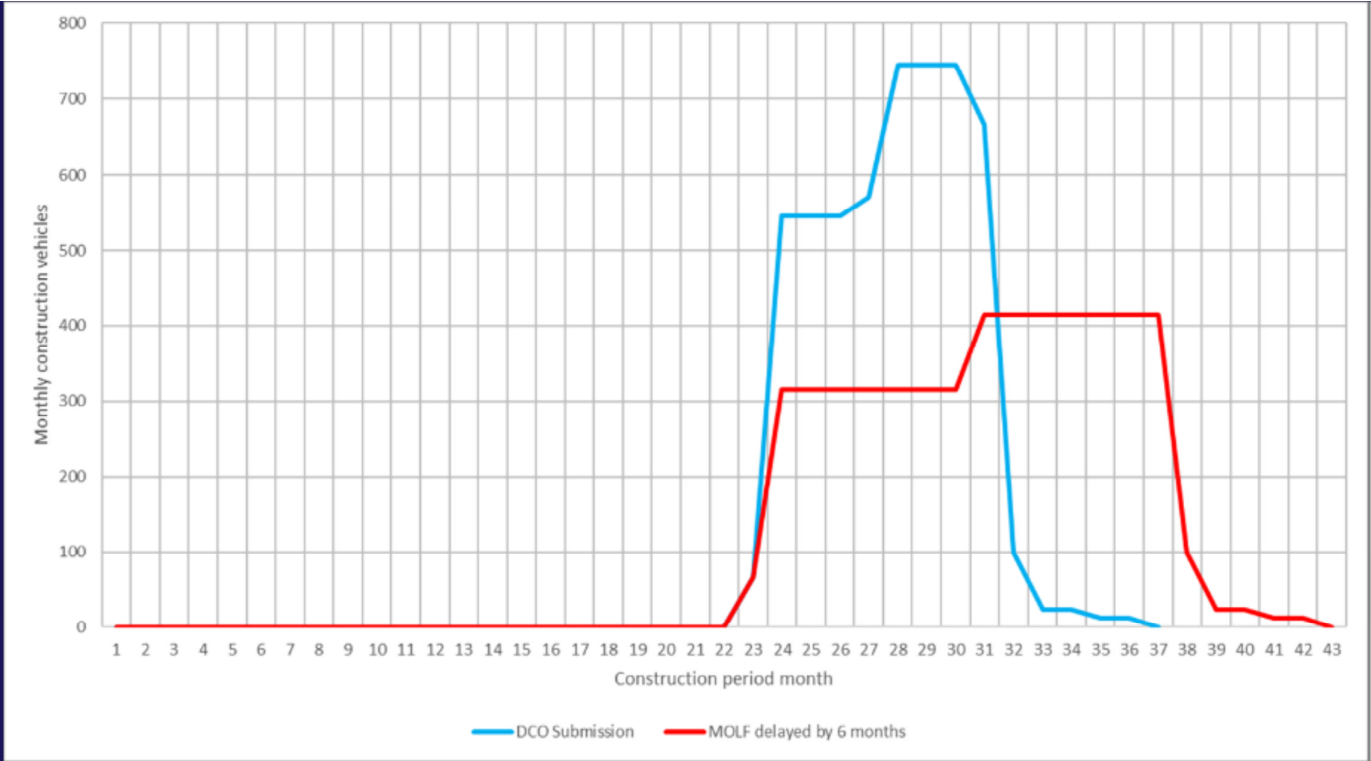
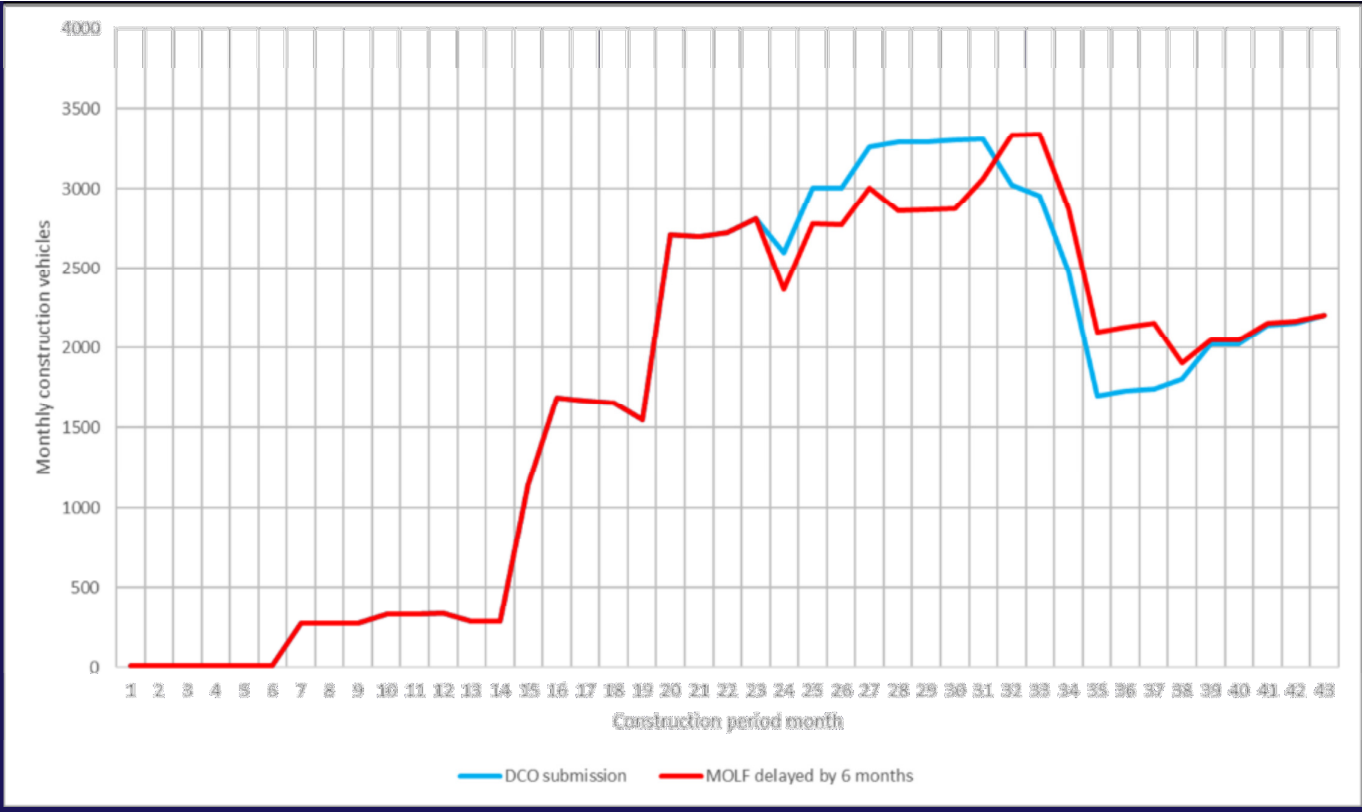


Figure 3 – Effect of six-month delay in delivery of MOLF on all HGV deliveries





Interested Party	IP response to Horizon's Response to FWQ	Horizon Comments
IACC	<p>The principle of assessing the effects as a result of delay to the delivery of key project components is welcomed by the IACC. However, the findings of this assessment does not address concerns raised previously by the IACC. The project control documents must address:-</p> <p>Delay to the delivery of the MOLF resulting in a delay to the commencement of First Nuclear Concrete Unit 1.</p> <p>Control of increase in HGVs in the later months of a delay to the MOLF, given the situation at Hinkley Point C where a 50% increase was needed.</p> <p>Delay to the delivery of the A5025 Off-line Improvements, as well as the cumulative impact of delay to the delivery of both the A5025 improvements and MOLF.</p>	<p>Horizon is committed to providing key mitigation, including the MOLF and the A5025 Off-Line Highway Improvements by fixed dates in the Phasing Strategy, which is a control document, and which has been updated and submitted at Deadline 4 (17 January 2019).</p> <p>Horizon's construction approach is different to that of Hinkley Point C (HPC), it is unlikely that the same situation would occur. Horizon are committed to delivering the MOLF within schedule to meet their construction programme. In the unlikely event there is a delay there is a range options that Horizon could use which would not require an increase to HGVs.</p> <p>Horizon has made commitments to capping HGV movements within the Wylfa Newydd CoCP, which is a control document and which has been updated and submitted at Deadline 4 (17 January 2019).</p>

**FWQ11.1.12:** Construction traffic associated with the proposed North Wales Grid Connection Project has been excluded from the modelling on the basis that it would be relatively limited (20 vehicles per hour per direction) and there is a degree of uncertainty over movements. In your opinion given the relatively low levels of traffic on Ynys Môn should these movement be included in the modelling?

**HORIZON'S RESPONSE TO FWQ:**

Construction traffic associated with the proposed North Wales Grid Connection Project (NWGCP) has not been excluded from the traffic modelling undertaken as part of the DCO Transport Assessment.

At the time of the preparation of the DCO Transport Assessment there was only limited information available about the traffic associated with the NWGCP. Sufficient traffic information was though provided near the finalisation of the DCO Transport Assessment to enable a sensitivity test to be undertaken to examine the traffic impacts of the NWGCP and Wylfa Newydd DCO Project on the operation of the Britannia Bridge. This traffic modelling assessment of the operation of Britannia Bridge was undertaken using the VISSIM traffic modelling software. The results are presented in Table 2.2 of the DCO Transport Assessment, Appendix L

– Supplementary Information [APP-113]. Further details about the North Wales Grid Connection Project and its impact on the Wylfa Newydd Project can be found in Chapter 2 of Appendix L – Supplementary Information.

Interested Party	IP response to Horizon's Response to FWQ	Horizon Comments
IACC	The assessment in DCO Transport Assessment, Appendix L underestimates the two-way movements (17 LGVs and 23 HGVs). The construction traffic from the National Grid Connection Project should be included irrespective of the level of traffic as it will have a cumulative impact. Further to this, 20 HGVs per hour per	It is unclear why IACC consider the flows in Appendix L of the Transport Assessment to be an under-estimation.  Since Deadline 3 (18 December 2018) there have been further discussions with AECOM who are the transport advisors to National Grid Connection project. As part of these discussions further information has been obtained concerning

direction would equate to 40 HGVs two way movements, or 480 HGVs over a 12 hour period, which is not a low level of traffic and can have a capacity impact on roads and junctions and an environmental impact on communities located alongside the construction routes, or users of those routes.

Horizon's response notes that sensitivity testing was undertaken to assess the cumulative impact on Britannia Bridge. The IACC would request similar testing for the A5025 between Valley and WNDA.

the potential period when construction vehicles associated with the National Grid Connection project would use the A5025 between the Valley and the Wylfa Newydd Development Area (WNDA).

It is now understood that construction traffic associated with the National Grid Connection project is expected to be required to use the A5025 between Valley and the WNDA from May 2022 onwards. It is the current expectation of the Wylfa Newydd DCO Project that the A5025 Off-line Highway Improvements would be open by this date. This means that the construction traffic associated with the National Grid Connection project would not affect the residents of Llanfachraeth and other locations bypassed by the A5025 Off-line Highway Improvements. If the delivery of the A5025 Off-line Highway Improvements is delayed for some reason, the National Grid Connection project has the potential to use alternative routes or the National Grid haul road network to enable their construction traffic to reach relevant work sites.

In addition, Horizon (and its suppliers) and the National Grid Connection project will cooperate to minimise traffic impacts in accordance with best practice and current CDM regulations.

		<p>Traffic issues associated with the National Grid Connection project (including the cumulative impact of the National Grid Connection project and the Wylfa Newydd DCO Project) are also considered as part of the National Grid's application for a Development Consent Order which was accepted by the Planning Inspectorate on 4 October 2018.</p>
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**FWQ11.1.15:** (a) Given the rural nature of the road network is the Highways Authority satisfied that the road network (following the proposed road improvements) is capable of taking the volume of traffic and loads proposed and would not be damaged as a result of the use by construction traffic?

(b) If the road network is damaged by construction traffic who would be responsible for its repair?

(c) Are there any requirements that the Highways Authority would suggest to minimise the effect of construction traffic on the road network and maintain existing road conditions over and above those already suggested by the applicant?

**HORIZON'S RESPONSE TO FWQ:**

Whilst the question is not directed to Horizon as the applicant, the following response is provided by Horizon at this stage:

In respect of the volume of traffic and loads to be using the road, capacity of the local roads has been assessed using the Congestion Reference Flow (CRF) methodology outlined in TA46/97 "Traffic flow ranges for the use of assessment of New Rural Roads" from the Design Manual for Roads and Bridges. The CRF is an estimate of the total AADT (Average Annual Daily Traffic) flow, takes into account the width of the roads, numbers of lanes, percentages of HGV in peak flow, proportion of daily traffic occurring at peak, directional splits etc. Based on the CRF, the local road network has been assessed as having an estimated capacity of 19,768 vehicles.

In appendix AC2-3 - Traffic Flows of Volume C - Road traffic-related effects (project-wide), Horizon has calculated volumes of traffic associated with background traffic flows and the Wylfa Newydd DCO Project in 2033 at approximately 11,480 vehicles AADT. Therefore, the local road network is capable of accommodating construction traffic associated with the Wylfa Newydd DCO Project.

In respect to any damage to the road network during construction, section 5.2 of the A5025 Off-Line Highway Improvements sub-CoCP [APP-420] provides that Horizon will undertake joint surveys with IACC Highways to assess the condition of the highway. Horizon will carry out periodic joint inspection throughout the lifecycle of the works. If repair works are required then the assumption is

that IACC highways maintenance team would carry out this work, financed by Horizon. Compliance with the sub-CoCP is required under Requirement OH1 of the Draft DCO [APP-029].

Horizon considers that this is sufficient to ensure that any damage to the road network as a result of construction traffic use is dealt with appropriately.

Interested Party	IP response to Horizon's Response to FWQ	Horizon Comments
IACC	<p>Horizon's calculation of Congestion Reference Flow (CRF) based on TA46/97 for the local road network and conclusion of adequate capacity with the addition of the Wylfa Newydd DCO Project traffic must address the more detailed level concerns identified in the IACC LIR and written response.</p> <p>Horizon's response also states that Section 5.2 of the A5025 CoCP sets out the requirement for Condition Surveys on a limited section of the A5025, however, there is no inclusion of this requirement in the overarching CoCP. Although the IACC welcomes this in principle, there is a need for the wider network that will be used by construction traffic to be considered in terms of monitoring structural damage and increased maintenance requirements, and this should be set</p>	<p>Horizon will undertake a joint survey with the IACC of the A5025 (between the proposed Power Station Access Road Junction and the existing Magnox junction through Tregele) and of Junctions 2,3, and 4 of the A55 (i.e. HGV routes from the Logistics Centre and the bus route from the Park and Ride on the local network). This will include a preconstruction road condition and deflectograph surveys, which will be carried out at regular intervals through the Wylfa Newydd DCO Project and at the end of Main Construction. The joint pre-construction surveys will form the basis for a road improvement/ repair strategy and ongoing maintenance during the construction period.</p> <p>These surveys will be secured through the A5025 Offline Highway Improvements sub-CoCP and the draft DCO s.106.</p> <p>In terms of capacity Horizon has demonstrated that the A5025 has adequate capacity to take the additional traffic associated</p>

	out in the overarching CoCP.	with the project and that the A5025 On and Off-Line Highway Improvements are designed on this basis.
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**FWQ11.1.16:** Do the local authorities agree with the applicant's description of the baseline situation regarding traffic flows and can they confirm whether they were involved in scoping the transport surveys for establishing the baseline?

**HORIZON'S RESPONSE TO FWQ:**

Whilst the question is not directed to Horizon as the applicant, the following response is provided by Horizon at this stage:

The baseline situation regarding traffic flows is presented in detail in the DCO Transport Assessment, Chapter 4. The scope of the Transport Assessment is detailed in Appendix B – Scope [APP-103] and this was discussed with the Isle of Anglesey County Council, the Welsh Government and Gwynedd County Council. The scope of the baseline traffic surveys used for establishing the baseline was agreed with the Isle of Anglesey County Council in December 2017, as recorded in the draft Statement of Common Ground with IACC, submitted at Deadline 2 (4 December 2018).

Interested Party	IP response to Horizon's Response to FWQ	Horizon Comments
IACC	Following further review of the TA, the IACC seek clarification of the HGV AADT figures set out in Appendix C2.03 as these show high and very varied growth levels between the 2016 baseline and reference flows for each of the years which don't reflect the traffic growth factors identified in Table 9.1 of the Transport Assessment. In some cases the HGV growth is as high as 71% between 2016 and 2020.	The difference in the traffic movements is attributable to increase in HGV figures over the period associated with Magnox decommissioning activities.

**FWQ11.1.19:** Paragraph 5.2.3 of the WNCOP [APP-414] deals with the management of deliveries to the site can the applicant:

- (a) Confirm what will happen once the A5025 off-line highway improvements become operational in terms of delivery times?
- (b) Explain why restrictions on deliveries during school start/end times are only proposed for the initial stages of construction (page 12 of the TA [APP-101]).
- (c) Advise whether to minimise congestion, restrictions should also be in place during the evening peak eg 17.00-18.30?
- (d) Explain what is meant by 'restrictions'.
- (e) Confirm what the delivery hours would be – the WNCOP [APP-414] infers 07:00-19:00 but the TA [APP-101] states that the period from 19:00 to 23:00 'could be used'
- (f) Explain why the logistics centre would need to operate on a 24 hour basis if deliveries would be restricted to 07:00-19:00 (or 23:00)

Does the IACC/Highways Authority/Welsh Government have any comments on these arrangements?

HORIZON'S RESPONSE TO FWQ:

(a)

Once the A5025 Off-line Highway Improvements become operational, restrictions associated with having no deliveries around school opening and closing times will be removed.

(b)

Restrictions on deliveries during school start/end times are only proposed for the initial stages of construction because the existing A5025 provides the direct access to a school in Llanfachraeth and a school in Llanfaethlu. There is a further school in Llanrhyddlad which is near the A5025 but its access is provided from a side road.

The A5025 Off-line Highway Improvements, once opened, will enable HGVs associated with the Wylfa Newydd DCO Project (and other traffic) to avoid directly passing the schools in Llanfachraeth and Llanfaethlu which are located adjacent to the A5025. Wylfa Newydd-related construction traffic will therefore then not pass these two schools and so the delivery window restrictions for school start/end times can be lifted without generating adverse effects on the operation of these schools.

(c)

The DCO Transport Assessment presents the traffic impacts of the Project in the AM and PM peak hours for the 2020, 2023 and 2033 assessment years. The analysis shows that no traffic congestion impacts are expected to occur on the A5025 during the peak year of traffic construction (2023) and hence no additional delivery restrictions are considered necessary. The shift pattern timings have been developed to avoid shift changeovers impacting the AM and PM peak traffic hours as far as practicable.

(d)

The term “restrictions” means that there will be no construction vehicle movements to or from the Wylfa Newydd Development Area which pass either of the two schools adjacent to the A5025 during the restricted hours.

e)

The delivery hours are as proposed in paragraph 5.2.3 of the Wylfa Newydd Code of Construction Practice. This states:

“The delivery window would run from 07:00 to 19:00, Monday to Friday, with restrictions during school start times (between 08:00 and 09:00) and end times (between 15:00 and 16:00) in advance of the A5025 Off- line Highway Improvements being operational. It is anticipated that deliveries may occasionally be undertaken outside of these times, but they will be limited, whenever practicable.”

Please note however, that Horizon is consulting until 8 December on a potential non-material change to HGV movements comprising deliveries 1900 to 2300 Monday to Friday (limited to 20 HGV movements in each direction) and 0800 to 1300 Saturday (limited to 50 HGV movements in each direction).

(f)

The Logistics Centre would need to operate 24 hours a day in order to manage the efficient arrival and departure of construction vehicle movements. Construction vehicles which travel overnight will arrive and wait at the Logistics Centre until they can be released in a regulated way after 07:00 the following morning. This means that the Logistics Centre will act as a holding area for incoming construction traffic each night, and will therefore need to remain operational 24/7.

Interested Party	IP response to Horizon's Response to FWQ	Horizon Comments
IACC	<p>c) Following further review of the TA, the IACC seek clarification of the HGV AADT figures set out in Appendix C2.03 as these show high and very varied growth levels between the 2016 baseline and reference flows for each of the years which don't reflect the traffic growth factors identified in Table 9.1 of the Transport Assessment. In some cases the HGV growth is as high as 71% between 2016 and 2020.</p> <p>f) Horizon's response needs clarification as it is implying that vehicles will arrive overnight and wait at the Logistics Centre. What is the level of overnight deliveries expected and how does this relate to operational hour restrictions which will be in place?</p>	<p>c) As explained in Horizon's further response above in respect of FWQ.11.1.16, the difference is attributable to Magnox decommissioning activity.</p> <p>f) The Logistics Centre needs to be available 24/7 to be able to support inbound deliveries from suppliers, who may be delivering from large distances and who may deliver overnight via the Strategic Highway Network.</p> <p>Horizon do not currently have details of the number of deliveries that the Logistics Centre will receive overnight.</p>

**FWQ11.1.24:** Can the applicant:

- (a) Provide examples of other schemes where the proposed Distribution Management Asset Tracking System (DMATS) has been successfully used?
- (b) Advise whether there is a cost attached to the use of the system for suppliers and whether this could preclude the use of smaller local suppliers?
- (c) How will vehicles be prevented from turning up early to the logistics centre or from waiting on the surrounding road network until their allotted arrival time? Is the IACC/Highways Authority/Welsh Government satisfied that the use of DMATS will manage deliveries as envisaged by the applicant?

**HORIZON'S RESPONSE TO FWQ:**

(a)

Distribution management systems (DMS) have successfully been used on many major infrastructure projects examples are for London 2012 and at London Heathrow Airport. Iterations of DMS are used by couriers for tracking domestic deliveries. Including an asset tracking (AT) system is relatively new and is a benefit for the client and supply chain in knowing where goods are as they are moved from point of origin to final installation. The AT side of the system will have no impact on the management of the traffic flow.

(b)

The cost to the supply chain should be minimal but a supplier would need to have access to the internet to be able to use the web based systems Horizon are considering. This detail would be made clear in any contracts and tenders put out for the work.

(c)

The aim of the Logistics Centre is to manage traffic. The Logistics Centre is open 24 hours, as such vehicles do not have slot times for the Logistic Centre and can arrive as they require to support their driver requirements. The slot time is based on leaving the Logistic Centre for site and the arrival at site. This enables significant control of HGV traffic on the A5025. If vehicles are found to be waiting

around on local roads there will be a system of measures to mitigate against such behaviour within the supply chain contract.		
Interested Party	IP response to Horizon's Response to FWQ	Horizon Comments
IACC	<p>a) The IACC welcomes the principle of utilising a Distribution Management Asset Tracking System (DMATS).</p> <p>b) Further control is needed on how Horizon will control the discharge of HGV's from the WNDA to avoid convoying and any undue impact on Britannia Bridge.</p>	<p>A change was made to the Main Power Station Site sub-CoCP at Deadline 2 (18 December 2018) [REP2- 032] to include a commitment to regulate the dispatch of HGVs from the WNDA.</p> <p>Further details on construction traffic management have been included in the version of the Wylfa Newydd CoCP submitted at Deadline 4 (17 January 2019).</p>

**FWQ11.1.26:** Does the TA include modelling for the impact on the road network of the additional 1,000 workers that would be required every nine months to deal with outages?

**HORIZON'S RESPONSE TO FWQ:**

The Transport Assessment does include modelling for the impact on the road network of the additional workers that would be required every nine months to deal with an outage. This is described in paragraph 10.1.4 of the DCO Transport Assessment. Results for the operation of the road network in 2033, when there are assumed to be two outages, are then presented in Chapter 11 of the DCO Transport Assessment. Detailed junction modelling results are also provided in Appendix H Junctions Assessment [APP-109] of the DCO Transport Assessment.

Further details of the modelling assumptions are provided in Section 7.4 of the Strategic Traffic Model Overview. Table 7.32 shows that the chosen year of assessment (2033) includes a double outage i.e. two outages during the same calendar year, when both reactors experience an outage. This therefore provides a worst-case assessment of the traffic impact of the outages.

Interested Party	IP response to Horizon's Response to FWQ	Horizon Comments
IACC	Noted. The IACC seeks clarification on traffic generation and distribution assumptions for the peak operational year and whether it includes the full 1,850 workers.	See Appendix G of at the Transport Assessment [APP-108]. The year 2033 represents the worst-case future year in which two Scheduled Outage periods are forecast to occur whilst also representing the year with the highest level of background traffic.

**FWQ11.1.41:** The applicant has indicated that facilities management workers would be expected to car share. However, given that the majority of these are likely to be homebased workers do you consider that this assumption is correct? If not, why not?

**HORIZON'S RESPONSE TO FWQ:**

Whilst the question is not directed to Horizon as the applicant, the following response by Horizon is provided at this stage:

Details concerning the expected travel arrangements for facilities management workers can be found in paragraphs 7.3.11 to 7.3.19 of the DCO Transport Assessment.

These paragraphs state that it is expected that 50% of facilities management workers living on Anglesey will use the proposed minibus service to reach their workplace. The remaining 50% of facilities management workers living on Anglesey are expected to travel by car.

All facilities management workers living on the Welsh mainland are expected to travel by car (see paragraph 7.3.14) given the expected wider geographic distribution of worker home locations. Facilities management workers travelling by car are expected to car share and an average of 1.5 workers per car is assumed. Overall 58% of facilities management workers are expected to travel by car and 42% of facilities management workers are expected to travel by minibus. This is described in paragraph 7.3.15 and 7.3.16 of the DCO Transport Assessment.

Interested Party	IP response to Horizon's Response to FWQ	Horizon Comments
IACC	The IACC's concerns relating to the assumptions of car sharing applies to both construction site workers and facilities management workers. For example, Horizon assumes that 149 parking spaces at the WNDA will be sufficient for 350 site campus management workers. Provision should be made	Horizon is confident they have sufficient parking spaces for Facilities Management Workers, many of whom are likely to be locally based and able to use bus services. Restraint on car parking provision is a key element in the transport strategy which focuses mainly on walking and bus modes for transporting workers during the construction phase



	<p>over the expected percentage of car travel (58%) and assumed car share ratio (1.5 per car), and a lack of parking provision should either of these assumed targets fail. IACC's Traffic and Transport chapter of the LIR expands on the issue around car sharing.</p>	<p>of the Wylfa Newydd DCO Project.</p>
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**FWQ17.0.8:** Can the Welsh Government provide an update on the progress of Planning Policy Wales Edition 10 (PPW10)? Can the applicant advise whether paragraph 5.4.45 of the Planning Statement (APP- 406) needs to be updated to reflect the policy contained within the emerging PPW10?

**HORIZON'S RESPONSE TO FWQ:** The Planning Statement notes (in the footnote to paragraph 5.4.41) that a Draft PPW: Edition 10 was published on 12<sup>th</sup> February 2018 and subject to consultation until 18th May 2018. PPW10 remains in draft form and, like PPW9, does not contain any specific policy relating to nuclear power generation. Whilst (like PPW9) the draft contains a range of broad objectives that are relevant to the Wylfa Newydd DCO Project (including promoting climate change resilience, protection of the environment and cultural heritage etc.), these were already policy objectives at the time that NPS EN-1 and EN-6 were prepared and therefore, it can be concluded that they have been taken into consideration in the preparation of the NPSs. Horizon submitted a response to the Welsh Government's consultation on draft PPW 10. In this representation, Horizon noted that the policies in PPW may be informative in identifying potential for adverse effects. These representations, among other things, noted the need for greater emphasis on a strong economy in promoting well-being goals and ensuring that there was not greater emphasis on environmental well-being goals than those which seek to encourage sustainable economic growth. As clarified in Horizon's Written Representation submitted at Deadline 2 (4th December 2018), it is not necessary to update the Planning Statement further in light of the draft PPW10, particularly as it does not contain any policies that specifically relate to nuclear power generation and because the consultation draft is still at a very early stage.

Interested Party	IP response to Horizon's Response to FWQ	Horizon Comments
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IACC	<p>PPW 10 has been published. The IACC consider that the planning statement should be updated to address the central role which has been given to well-being in that new edition and provide Horizon's assessment of how they comply with the well-being driven revisions. Given the life of the proposed development, the effects will be felt over multiple generations. It is accordingly not disproportionate to ask the applicant to give a meaningful update addressing the now current Welsh policy which reflects welsh legislation which was already in place when the application was developed and to which the applicant was specifically asked to have regard to.</p>	<p>The Planning Statement for the Draft DCO and Horizon's response to the FWQ was written at a time when PPW 10 was only in draft form and therefore it was given a proportionately limited consideration.</p> <p>Horizon has however subsequently considered whether the proposed changes to PPW10 would result in any different important and relevant considerations in relation to the Wylfa Newydd DCO Project.</p> <p>Horizon's response to IACC's Local Impact Report, submitted at Deadline 3 (18 December 2018) [REP3-004] states that the Wylfa Newydd DCO Project is considered to comply with PPW10 (paragraph 2.4.3).</p> <p>Horizon's response to the Welsh Government's Written Representation submitted at Deadline 3 (18 December 2018) [REP3-034] notes (at paragraph 1.3.2) that PPW10 does not include any specific policies relating to nuclear development, although it includes a number of broad principles that the Wylfa Newydd DCO Project is consistent with including:</p> <ul style="list-style-type: none"><li>• Support for sustainable economic growth;</li><li>• Recognising the importance of moving towards a low</li></ul>
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carbon, resilient society;

- Making best use of resources;
- The importance of good quality/well designed homes, jobs, services, infrastructure and facilities so that people feel content with their everyday lives; and
- Acting in the long term to respect environmental limits.

As noted in Horizon's Written Representation [REP2-003], Horizon made representations to draft PPW10, which, amongst other things, supported the restructuring of the PPW around the Well-Being Goals.

The final version of PPW 10 includes a new key planning principle – "Growing our economy in a sustainable manner" which states:

*"The planning system should enable development which contributes to long term economic well-being, making the best use of existing infrastructure and planning for new supporting infrastructure and services. Communities, national and local government, businesses, and the third sector must work together to take a long term view, integrating and aligning priorities through greater collaboration to achieve sustainable economic benefits for all in line with the well-being goals."*

		<p>Horizon's Draft DCO application documents recognise the Well-Being Goals in the Well-Being and Future Generations Act (as reflected in PPW10), and the contribution of the Wylfa Newydd DCO Project to these, in a number of the reports and assessments. Horizon's responses to the Examining Authority's FWQs, submitted at Deadline 2 (4 December 2018) [REP2-375], included references to where in the Well-Being Goals are considered as follows:</p> <ul style="list-style-type: none"><li>• FWQ.9.0.019 in relation to air quality and noise;</li><li>• FWQ.10.1.1 in relation to Sustainability;</li><li>• FWQ.17.0.5 in relation to the duty of public bodies in the Well-being and Future Generations (Wales) Act and with reference to the Health Impact Assessment and Welsh Language Impact Assessment; and</li><li>• FWQ.17.0.08 in relation to the relevance of draft PPW10.</li></ul>
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