



CYNGOR SIR
YNYS MÔN
ISLE OF ANGLESEY
COUNTY COUNCIL

Ms Kay Sully,
The Planning Inspectorate,
National Infrastructure Planning,
Temple Quay House,
2, The Square,
Bristol,
BS1 6NP

DYLAN J. WILLIAMS BA (Hons), MSc, MA, M.R.T.P.I
Pennaeth Rheoleiddio a Datblygu Economaidd
Head of Service Regulation and Economic Development

CYNGOR SIR YNYS MÔN
ISLE OF ANGLESEY COUNTY COUNCIL
Canolfan Fusnes Môn • Anglesey Business Centre
Parc Busnes Bryn Cefni • Bryn Cefni Business Park
LLANGEFNI
Ynys Môn • Isle of Anglesey
LL77 7XA

ffôn / tel: (01248) 752431/2435
ffacs / fax: (01248) 752192

Gofynnwch am / Please ask for: Dylan Williams
E-bost / Email: DylanJWilliams@anglesey.gov.uk
Ein Cyf / Our Ref: YM / EN010007
Eich Cyf / Your Ref: EN010007

Dyddiad / Date: 12.2.2019

Dear Kay,

**Wylfa Newydd DCO Examination EN010007 - Deadline 5 Submissions.
Response to the ExA's Further Written Questions**

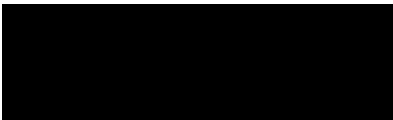
Please find attached the IACC's submissions in respect of the above (Table accompanying this letter).

Q2.13.8 change to workers shift patterns, Q2.13.16 change to workers HGV movements, and Q2.13.22 proposed change to working hours are dealt with in Annex A to this Table.

Please note that, due to file size restrictions, the response to Q2.17.1 – submission of the Wylfa Newydd Supplementary Planning Guidance – is subject of a separate e-mail which has already been sent to PINS.

Welsh versions will be submitted as soon as translations are available.

Yours sincerely,



Dylan J. Williams
Head of Service
Regulation and Economic Development

Reference	Respondent:	Location:	Question:	IACC RESPONSE
1.	Air Quality including Dust			
Q2.1.1	NRW	WB	With reference to the NRW response to ExA First Written Question Q1.0.5, is the information in relation to permit application(s) still correct? If not, please provide an update.	
2.	Biodiversity			
Q2.2.1	NWWT	WA	NWWT and the Applicant disagree over baseline data for fungi. In its WR [REP2-349] NWWT states that CHEG fungi cannot be recreated, how much CHEG does NWWT consider would be lost?	
Q2.2.2	The Applicant	ADD	Mitigation measures at the A5025 are described in greater detail in Appendix G9-10 [APP-334] than in the A5025 sub-CoCP [REP2-036]. Can the Applicant explain why it has removed reference to ES Appendix G9-10 in the revised sub-CoCP (it was at para 11.2.1)?	
Q2.2.3	The Applicant, NRW and RSPB	WA	While accepting the Applicant's response in [REP2-375] that they do not consider water level management at Cemlyn Lagoon as a required mitigation measure, the ExA would welcome the Applicant and NRW, the RSPB and other IPs views on the importance of such management to support conservation of the site.	
Q2.2.4	The Applicant	Q	Working hours in para 4.3.2 of the MPSS sub-CoCP [REP2-032] do not include working hours for the site preparation works (it starts at 'earthworks' from 07:00-19:00). Can the Applicant include working hours similar to those in the TCPA site preparation permission application in the sub-CoCP?	
Q2.2.5	The Applicant	WF	In the LHMS [REP2-037] 4.2.2 states that a detailed landscape and visual baseline assessment has been carried out and the landscape maintenance is described in 4.2.34. 1) How has the assessment taken into account the time taken for the scheme to establish? 2) Given the exposed/coastal nature of the environment, what assurances are there that planting will establish as quickly as the Applicant	

Reference	Respondent:	Location:	IACC RESPONSE	
			assumes?	
Q2.2.6	The Applicant	WF	In [APP-128] para 9.4.53 there is the mention of oil separators as a protection measure for surface water drainage to the sea. However, there is no reference to oil separators in section 10.2 of the WNCooP [REP2-037] which appears to be more related to the storage of fuel and chemicals, rather than surface water from car parks/roads. Can the Applicant clarify what pollution controls for surface water run-off would be implemented?	
Q2.2.7	The Applicant	WF	dDCO requirements WN9 & WN11 [REP2-020] require that landscape and habitat schemes for the WNDA must be submitted for approval 12 months prior to the anticipated Unit 2 Commissioning Date, but do not stipulate that the landscaping and habitat schemes must be undertaken prior to operation of Unit 2. Can the Applicant clarify when the schemes would be completed?	
3.	Climate Change and Resilience			
Q2.3.1	The Applicant	Q	Climate change and adaptation is covered in Section 5.6 of the Sustainability Statement [APP-426], but the approach does not appear to fully comply with the requirements of EN-1 and EN-6. Section 5.6 explains how the project would help reduce climate change effects and mitigation during construction, but adaption is not so detailed. Can the Applicant demonstrate please how paras 4.8.6 - 4.8.8, 4.8.10 and 4.8.12 of EN1 would be satisfied?	
Q2.3.2	The Applicant	ADA	In the Carbon and Energy report [APP-423] Carbon Footprinting Methodology, Figure 4-4 shows that Construction includes operation of the Campus but Table 4-1 only includes energy use for construction plant. Figure 5-5 does include the Campus. Can the Applicant clarify where the operational impacts of the Campus have been addressed?	
Q2.3.3	The Applicant	WC	Can the Applicant explain how potential storm surges resulting from climate change have been addressed for the protection of the MOLF and Power Station?	
Q2.3.4	The Applicant, IACC &		The Applicant submitted a note [REP4-004] providing additional details regarding impacts on the tidal embankment, as part of the Off-line Highway	IACC consider that, subject to the implementation of the identified flood risk mitigation and compensation measures, the works at Section 1 Valley are compliant with TAN15.

Reference	Respondent:	Location:	IACC RESPONSE	
	NRW		Improvements at Valley, with additional compensation for any breach. Are IACC and NRW content with the outcomes? If not, why not?	
Q2.3.5	The Applicant & NRW		Is NRW in agreement with the Applicant's additional modelling in its Flood Consequence Assessment (FCA) Addendum [REP2-371] for Dalar Hir? If not, what additional information would it require?	
Q2.3.6	The Applicant & NRW		Can the Applicant and NRW provide an update on the position with the legal agreement with the relevant land owner at Llanfachraeth to "allow" additional flooding on its land, and NRW's position?	
Q2.3.7	The Applicant		Can the Applicant explain why it is not providing into the Examination the actual design for flood risk mitigation required to offset the increases in flood risk to Nant Cemaes, Afon Cafnan and Nant Cemlyn, but is proposing an additional dDCO requirement to submit the mitigation details post-consent?	
4.	Development Consent Order			
Q2.4.1	The Applicant		CoCP - Ensure that track change copies of the Control Documents and the draft s106 are submitted at Deadline 5.	
Q2.4.2	The Applicant	All	Table 2-3 <i>Volume 8 'Other Documents'</i> of the <i>Guide to the Application Rev.2.0</i> [APP-421] notes the CoCP, Sub-CoCPs and CoOP to ' Outline... ' the framework of measures/the strategies, measures and standards to be adopted in relation to potential impacts. Within the framework/strategies that would create such an approach, how precise, enforceable and effective would associated DCO requirements be?	
Q2.4.3	The Applicant and IACC		Article 2 - Commence Given the submissions at D4 by the Applicant and IACC, does either party wish to comment further in respect of the definition of Commence?	IACC maintains its position as submitted. Given that the impacts of this project are spread across multiple sites, the Council does not accept that the width of definition sought is acceptable simply because similar definitions may have been used in other DCOS. Horizon's submission that erection of buildings would only be used outside the main site for site establishment provides no comfort without some limitation reflecting this being included within the DCO.
Q2.4.4	The Applicant and Other		Article 2 - Maintain Alternative drafting has been proposed by IACC . Do IPs wish to comment?	No response required

Reference	Respondent:	Location:	IACC RESPONSE	
	IPs			
Q2.4.5	The Applicant and IACC		Article 10 - Defence to statutory nuisance Could the level of controls/measures in the CoCPs be equated to the detailed controls which could be imposed by a s60 CoPA notice or s61 CoPA consent (which themselves can constitute a defence in proceedings)?	No. The detail in the CoCPs is too high level and vague to constitute a meaningful control. Applications for S61 consents would include dates and times for planned works broken down by type, the plant and equipment which will be used and detailed construction noise calculations and monitoring regimes for such noise. The consents then include mitigation measures, noise limits based on the application and British Standards and requirements to notify of overruns. The main site sub-CoCP [REP2-032] in contrast only provides that details will be provided in the s61 application (see eg sections 8.3 and 8.4). As it is explicitly set out in the code that further detail is required for a s61 consent, that code cannot reasonably be considered to be comparable with the level of control imposed in the s61 consent and compliance with the code should not be able to constitute a defence to statutory nuisance.
Q2.4.6	The Applicant		Article 27 For clarity, should Article 29 be amended to make clear that compensation is available for CA of private rights?	
Q2.4.7	The Applicant		Article 29 Should the following works underlined be added to Article 29 (4) <i>(4) Any person who suffers loss.... under this article <u>and article 27</u> is entitled to compensation....</i>	
Q2.4.8	IACC		Article 31 – Acquisition of Subsoil IACC refers to the Applicants response to this article as disingenuous “as the notices referred to will not be served until acquisition is to be taken some time after any DCO is granted” IACC argues that landowners should be given as much detail as possible in the Book of Reference (BoR) as to what rights will be acquired so that landowners can participate fully in the examination. IACC argues that Applicant should be restricting powers to only those rights required. D3 response. The Applicant response at REP4-027 states that “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.” Does IACC wish to comment further?	Horizon’s approach that the rights acquired will be defined at the time of service of notices creates considerable uncertainty and concern for the IACC as a landowner and as a Highway Authority. Service of notices can be up to 5 years after DCO grant. It is not unreasonable for the Council or any other affected landowner to seek greater precision on what rights Horizon intends to acquire now in accordance with the principle of minimum interference. The approach being taken by Horizon is creating unnecessary dispute. The IACC continues to offer to enter into agreements to allow any works necessary on public highways without any need for CA of operational highways at all. Horizon’s refusal to even discuss voluntary agreements to carry out works is unreasonable. Given the IACC’s willingness to enter agreements the powers sought are unnecessary and Horizon’s approach does not accord with the guidance on the use of these powers. Horizon will likely argue that there is insufficient time left in the process to conclude such agreements, however this is because they did not engage with the IACC on this issue ahead of making the application or earlier in the process. Horizon should not be granted sweeping powers of acquisition due to a need created only by their own failure to properly explore other, less draconian, options. Although IACC continue to prefer to enter into an agreement to permit works to highways, protective provisions for the protection of the highway authority are being discussed as an alternative which would allow removal of the IACC objection on a large number of plots (although not all). The IACC notes however that this is being done for expediency only, that the protective provision provisions are not yet agreed and do not

Reference	Respondent:	Location:	IACC RESPONSE	
				yet cover all of the matters of concern. The in-principle objection to the sweeping use of CA powers beyond what is necessary to deliver the project and where a voluntary agreement has been offered is maintained.
Q2.4.9	The Applicant & IACC		Article 74 Given the submissions at D4 by the Applicant and IACC, does either party wish to comment further in respect of this Article?	The IACC has nothing to add and maintains its position that it is not necessary or appropriate for electricity undertaker permitted development rights to accrue to sites which are not concerned with electricity generation and which are outside of the main site, especially the park and ride site.
Q2.4.10	The Applicant WG		Article 82 Crown Rights Responses at D2 [REP2-375] and D3 [REP3-063] indicate that Applicant and WG are still in discussion regarding the approach to land identified in the B of Ref (National Assembly for Wales, Welsh Ministers and Secretary of State for Wales). At REP4-053, WG confirm that it has engaged with Horizon in regard to the matter of Welsh Government's land interests within the Order Limits and that it welcomes the recent amendment to the Book of Reference, which now identifies Welsh Government's interest under the Crown Land Section. 7.1.2 <i>However, Welsh Government state "no formal approach has yet been made under S135 Planning Act 2008 seeking Welsh Government consent, and to date no consent has been given by Welsh Government. The position of the Welsh Government has been consistent in respect of Crown Land and this is set out in detail in the Welsh Government's Written Representation (section 2.2) submitted at Deadline 2. This section includes the reason why the land vested in the name of National Assembly for Wales is to be treated as vested in Welsh Ministers (2.2.5) and comprises Crown Land..."</i> 1) Does the Applicant continue disagree with the need to obtain consent for each identified plot pursuant to s35 of PA2008? 2) What is required to enable these differences of opinion to be overcome?	
Q2.4.11	The Applicant		Schedule 1 - Work No 1L and 1N and Requirement WN16 It's noted that this change is to rectify an error in the Planning Statement. 1) Is this simply correcting a typographical error? 2) Are there any other planning implications of changing the car parking provision?	

Reference	Respondent:	Location:	IACC RESPONSE	
			3) Are there any environmental/traffic impact issues?	
Q2.4.12	The Applicant, IACC, WG, NRW and NWP		<p>PW2 – Wylfa Newydd CoCP</p> <p>Many IPs have raised concerns that should the detail of the CoCP not be agreed prior to the end of examination, than existing CoCPS and sub codes are treated as statements of principle/parameters and that further detail would need to be approved by IACC using pre-commencement requirements.</p> <p>1) Could this approach create the possibility of an uncertain scheme which hasn't been properly assessed?</p> <p>2) Would this approach to requirements be lawful, given Rochdale principles, and is reasonably intended to fix 'finalised aspects' at a later date?</p> <p>In responding to this question, attention is drawn to paras 103 and 104 or pre-application guidance.</p>	<p>IACC does not believe that the concern it has expressed over subsequent approval of material to be submitted in amplification of the existing CoCPs and Sub-Codes would give rise to any material risk of challenge or criticism of the scheme being uncertain and/or not having been properly assessed.</p> <p>The present content of the CoCPs plus any further amendment to them during examination would remain as the basis of the certified documents in the DCO. That content would act as a series of parameters against which the original scheme has been assessed. Approval of further details could not widen those parameters without separate environmental assessment.</p> <p>The nature of the additional detail that is presently being sought by IACC would serve only to narrow the range of possible impacts within those parameters and therefore would not require additional environmental assessment.</p> <p>Such an approach would be consistent with the legal principles in the Rochdale decision.</p> <p>The reference paras 103 and 104 in PINS pre-application guidance is of some relevance here, but does not deal with the issues comprehensively. Some detail that has not been supplied by HNP is correctly categorised as matters for which a more accurate assessment of future circumstances prevailing at that time will enable better, more effective operating processes to be applied for and approved. However, a number of concerns raised by IACC and others about lack of detail could have been remedied by additional detail from HNP at the point of application. In those cases, IACC's request for subsequent approval of details is driven by a wish to ensure that adverse impacts are avoided or minimised wherever possible and that the present level of detail allows greater latitude for impacts than needs to be the case. Whilst those possible impacts may have been assessed, it does not mean that they should be allowed. Future approval will allow further reduction of impacts where that can reasonably be achieved.</p>
Q2.4.13	The Applicant		<p>PW2 – Wylfa Newydd CoCP</p> <p>In the event that agreement is not reached between the parties over the necessary level of details to be provided in the CoCP and sub-CoCPs, provide the drafting of new requirement(s) or an amended PW2 that would enable approval of Outline documents with approval later by the LPA in consultation with named relevant stakeholders.</p>	
Q2.4.14	The Applicant, IACC, WG and NRW		IPs have expressed concern in relation to their ability to keep track of progress with the proposed development and any changes. Should a Register of Requirements be included in the DCO as for example, was included in	The IACC would welcome the inclusion of a requirement for a register in the terms suggested. As well as assisting the statutory bodies in carrying out their functions, such a register would assist the communities affected by the development by providing a useful reference and would therefore assist in making the development process

Reference	Respondent:	Location:	IACC RESPONSE	
			<p>the A14 Cambridge to Huntingdon Improvement Scheme Development Consent Order as per text below:</p> <p><i>Register of requirements 22. —</i> <i>(1) The undertaker must, as soon as practicable following the making of this Order, establish and maintain in an electronic form suitable for inspection by members of the public a register of those requirements contained in Part 1 of this Schedule that provide for further approvals to be given by the Secretary of State.</i> <i>(2) The register must set out in relation to each such requirement the status of the requirement, in terms of whether any approval to be given by the Secretary of State has been applied for or given, providing an electronic link to any document containing any approved details.</i> <i>(3) The register must be maintained by the undertaker for a period of 3 years following completion of the authorised development.</i></p>	transparent and accessible to the public.
Q2.4.15	The Applicant		<p>PW2 – Wylfa Newydd CoCP NWP are concerned that the CoCP only refers to Key Mitigation which in the Interpretation (Schedule 3 (1)) does not refer to the Power Station and delivery of that within timeframe set out in ES and that delivery as set out in the Construction Method Statement and the Phasing Strategy must be included or a new requirement.</p> <p>Does the Applicant wish to comment?</p>	
Q2.4.16	IACC		<p>PW7 – Wylfa Newydd CoCP The Remediation Strategy identifies that there are further measures and plans that are required for its delivery in particular those to address unexpected contamination, implementation of the remediation and verification.</p> <p>IACC consider that minimal detail on how land contamination is to be managed is provided.</p> <p>Is IACC requesting that the Remediation Strategy as set out in the Main Power Station Site sub-CoCP is amended further to address the concerns it has set out? Or is IACC proposing the introduction of a new requirement?</p>	<p>IACC maintains its position that there are further measures and plans required of the Remediation Strategy. IACC would wish to see the Main Power Station sub-CoCP amended to address these concerns. However should this information not be available by the end of the examination, IACC propose the introduction of a new requirement to allow for the approval of the following information prior to any works commencing;</p> <ul style="list-style-type: none"> a) Detailed methodology for the design, preparation, implementation, verification plan, and monitoring and maintenance of the remediation shall be submitted to and approved in writing by IACC. This is to include rationale for further sampling, remediation criteria and analysis to allow design and verification. The methodology shall be sufficiently detailed and thorough to ensure that upon completion of the site it will not qualify as contaminated land under Part IIA of the Environmental Protection Act 1990 in relation to its intended use. The approved remediation scheme shall be carried out [and upon completion a verification report by a suitably qualified contaminated land practitioner shall be submitted to and approved in writing by the local planning authority] before the development [or relevant phase of development] is occupied. b) Details of the processes and procedures for the management of unexpected

Reference	Respondent:	Location:	IACC RESPONSE	
				contamination, including rationale for further sampling, specific methodologies for safely managing unexpected contamination and minimising potential environmental impacts from unexpected contamination shall be submitted to and approved in writing by IACC. Any contamination that is found during the course of construction of the approved development that was not previously identified shall be reported immediately to IACC. Development on the part of the site affected shall be suspended and a risk assessment carried out and submitted to and approved in writing by IACC. Where unacceptable risks are found remediation and verification schemes shall be submitted to and approved in writing by IACC. These approved schemes shall be carried out before the development [or relevant phase of development] is resumed or continued.
Q2.4.17	The Applicant, IACC, WG and NWP		<p>PW8 – Code of Conduct IACC, WG, NWP, and others want this to be part of DCO and not 'for information'. WG states "Fundamental importance that the DCO requires all mitigation strategies and control documents to be submitted for approval by the relevant body in consultation with any other relevant body specified so that it covers the right detail to secure mitigation and to be implemented and enforced." It proposes that approval should be via IACC in consultation with GCC and CCBC on basis that some of the mitigation will fall within responsibility of those authorities in addition to IACC.</p> <p>The Applicants position is that this would be prepared in accordance with the Workforce Management Strategy which would be a certified doc.</p> <p>1) Why does this approach not satisfy IACC, WG, NWP and others? 2) Or should PW8 provide details of how the Code of Conduct should be approved, monitored and enforced including in consultation with North Wales Police?</p>	<p>1. This approach does not satisfy the IACC as the Workforce Management Strategy lacks the necessary detail on the Code of Conduct, particularly in relation to how it will be monitored and enforced.</p> <p>2. The Code of Conduct should be submitted to the IACC for approval (in consultation with North Wales Police) and must provide detail on how the Code of Conduct will be implemented, monitored and enforced.</p>
Q2.4.18	The Applicant and IACC		<p>PW9 – Date of commissioning and cessation Applicant states it has provided one month and three months. IACC states that the amended drafting does not do this and that in any event, five working days would be appropriate given that the obligation is only to notify IACC.</p> <p>Would the Applicant set out what its intention is and whether five working days as proposed would be appropriate?</p>	Question not actually for IACC
Q2.4.19	IACC and NWP		PW11 – Community Safety Management Strategy (CSMS)	IACC remains of the view that any documentation for subsequent approval via a requirement should be submitted through it, as Local Planning Authority, in order that

Reference	Respondent:	Location:	IACC RESPONSE	
			<p>NWP proposes an amendment to the requirement so that NWP is the body who approves the document and that this needs to be done within 2 months of receiving the draft document.</p> <p>An alternative approach would be that IACC approves the document in consultation with NWP.</p> <p>1) Would IACC and NWP resist this proposal? 2) Should the CSMS be included as a Certified document under Schedule 18?</p>	<p>there is consistency of enforcement in the event of failure to submit required information. Consultation on this detail with NWP would be expected as with any other relevant stakeholder on pre-commencement conditions.</p> <p>As a document for further approval, submitted after confirmation of the DCO, this could not then achieve certified document status. If it is proposed to advance this to completion now, then the IACC would have concerns that this was being completed ahead of other documents with which it should align.</p>
Q2.4.20	The Applicant, NWP and IACC		<p>In light of the comments made by IPs with respect to the dDCO s.106, particularly IACC's strong opposition to the current allocation structure for contingency funds, the Applicant stated at the second DCO hearing that the dDCO may require amendments to establish the necessary allocation body to allocate contingency funds provided for in the dDCO s.106.</p> <p>NWP request the inclusion of a new Article which would define the structure, governance and role of the WNMPPOP (if it is to apply and exist).</p> <p>It refers to Article 66 of the Silvertown Tunnel made Order as providing precedent for this approach.</p> <p>1) Can the Applicant provide an update as to whether it is proposing amendments to the dDCO to establish an 'allocation body' 2) What are the Applicants comments in respect of the proposal made by NWP? 3) Does IACC or any other party wish to comment?</p>	<p>IACC does not believe any discrete "allocation body" is required for the operation of the section 106 agreement. That remains so, whether the body in question is constituted outside of the section 106 or from within it. The Local Planning Authority, IACC, will remain under a duty at all times to apply an appropriate determinative discretion in respect of any contribution of mitigation funding via the section 106, be that through specified mitigation sums or any elements of contingency funding. The process by which that consideration would be carried out is fully transparent and subject to well established public law principles. Any other contractually constituted body or with its constitution contained within the terms of the DCO would not improve upon that statutory position but very likely would be inferior to it and would attract a challenge risk that is unnecessary and avoidable.</p>
Q2.4.21	The Applicant and IACC		<p>Given section 120(2) (b) PA2008 what are your comments in respect of Appendix 2 of REP4-043?</p>	<p>This response is predicated on IACC being the discharging authority under the DCO. The IACC would welcome the North Wales Police being a required consultee on any plan in which they consider they have an interest and would support that in all the requirements where Appendix 2 requests consultation. The IACC does not however consider that multiple or multi-layer approvals of a single plan should be required under the DCO (ie approval by both NWP and IACC for example) as this is likely to become unworkable in practice should there be any disagreement between the two bodies. It is not considered that the power set out in s120(2) was intended to allow the creation of multi-layer approvals but rather the appointment of the most suitable discharging authority for that project.</p>
Q2.4.22	The Applicant and NRIL		<p>NRIL want a new requirement which requires a construction management plan to be approved by local highway authority before commencement of the highway improvement works where it affects freight facility [REP2-331].</p>	

Reference	Respondent:	Location:	IACC RESPONSE	
			What is the Applicants view?	
Q2.4.23	The Applicant and NRIL		NRIL are also considering a requirement in relation to any increase in users of the level crossing at Valley arising from the construction and operation of the proposed development. What is the latest position and what is the Applicants view?	
Q2.4.24	The Applicant		Site Preparation and Clearance Works – Work No 12 Should SPC be in full in the title of this section?	
Q2.4.25	The Applicant		SPC5 It is not clear how the Main Power Station Site has been updated to include a corresponding control and why this requirement is no longer necessary. Please provide further justification and explanation.	
Q2.4.26	The Applicant		SPC10 Drainage Scheme Provide detail of the drafting of the new drainage requirement proposed at REP2-004.	
Q2.4.27	The Applicant NWP		SPC12- Access NWP expressed concern that 8 meters set back may not be sufficient to allow safe access to main site [REP2-345 para7.12 vii]. Are discussions now concluded between the two parties and has agreement been reached? If so, please signpost where in the documentation.	
Q2.4.28	The Applicant		WN4 – Buildings and Structures Applicant has only provided maximum height of the building in metres Above Ordnance Datum (AOD). IACC request that minimum height is also provided for clarity. Does the Applicant resist?	
Q2.4.29	The Applicant		WN10 – Wylfa Newydd CoOP and OPSF4 IPs argue that the detail in the CoOP is lacking. 1) In the event that agreement is not reached between the parties over the necessary level of details to be provided in the CoOP, provide the drafting of a new requirement that would enable approval of Outline documents with approval later by the LPA in consultation with named relevant stakeholders.	

Reference	Respondent:	Location:	IACC RESPONSE	
			2) How would the CoOP be monitored and enforced?	
Q2.4.30	The Applicant and NWP		NWP requests a new requirement for an Operational Travel Strategy (currently secured by forming part of the CoOP) and that this should be prepared prior to 'operation of the power station' but which accords with the CoOP. What are the Applicant's views?	
Q2.4.31	The Applicant, IACC and WG		<p>- WG want Dalar Hir to be operational before construction commences and have 1,900 spaces by 2022.</p> <p>1) Should a new requirement be introduced, to provide minimum parking spaces linked either to phasing plan or increase in workers/ A specific maximum number /a commitment to a layout plan of the site allowing phased construction /and earlier occupation rather than waiting 18 months /EV charge points and various vehicle types</p> <p>2) Should parking provision be more precisely defined?</p> <p>3) Should design drawings be submitted for construction parking irrespective of whether these would be temporary facilities?</p>	<p>It is noted that WN15 relates to construction car parking at WNDA but the question is equally relevant to Dalar Hir P&R which is PR5.</p> <p>1) IACC requires a minimum (not maximum) of 1900 spaces to be provided and available within the WNDA and a minimum of 1900 spaces to be provided and available at Dalar Hir for the duration of the construction to ensure that there are no issues with insufficient parking which could result in fly parking. IACC will accept the phased delivery of parking provision at both sites providing it is linked to the phased increase in the construction workforce. The easiest way to secure agreement on any phased delivery would be through the submission and agreement by IACC of a layout plan showing the phasing of delivery. The site layout/phasing plan should include for early provision of car parking at the main site, in advance of the 18 months currently proposed. IACC will require a minimum of 10% of parking spaces to include for EV Charge points. This is consistent with Planning Policy Wales Edition 10 paragraph 4.1.39.</p> <p>2) Yes, Parking provision should include details of the level of provision (number of useable/available spaces), type and location as well other facilities (cycle, motorcycle parking, charging points) not just numbers of spaces.</p> <p>3) Yes. Design drawings should be submitted to the relevant authorities to ensure that the parking layout, circulation and spaces are safe and appropriate for use and provide the function they have been assumed to in the assessments.</p>
Q2.4.32	The Applicant		SITE CAMPUS WORKS (PREFIXED "WN" 17-25) Should Schedule 3 5.(1) be amended to read WN17-WN23 and not WN17-WN25?	
Q2.4.33	The Applicant and IACC		<p>WN20 Site Campus finished parameter plans and maximum finished dimension of buildings and other structures</p> <p>Maximum heights – Schedule 3 para 1(8) of Rev 2 now includes maximum height from above finished ground level. REP1-004 DCO revision</p> <p>WG view that Accommodation Block height would not be 32meter but would be 21meter total height as the maximum number of storeys would be 7.</p> <p>IACC wants both heights to be included for more clarity.</p>	<p>The IACC request for multiple heights related to the inclusion of heights from AOD and finished ground levels so that the visual impact can be meaningfully assessed.</p> <p>The IACC position as outlined in the Written Representation [REP2-218 section 14] is that greater flexibility is required in the design and layout of the site campus (parameter limits) to allow for potential changes in storey heights. This could potentially result in the removal of some accommodation blocks (particularly the three accommodation blocks towards Wylfa Head).</p> <p>The IACC would however need to be consulted on which accommodation blocks should remain at 4 storey and which could potentially be increased. The need for minimum</p>

Reference	Respondent:	Location:	IACC RESPONSE	
			Has this been resolved and if so, where in the documentation?	<p>parameters has been highlighted by the IACC in numerous previous representations.</p> <p>The IACC however, agrees with the WG that 4.5 meter per storey seems excessive and would seek further clarity / explanation from the applicant.</p> <p>This issue has not been resolved.</p>
Q2.4.34	The Applicant and IACC		Should there be a specific requirement for the LPA to approve proposals for sports and leisure facilities at the WNDA including details of the fencing, lighting, and drainage and surfacing?	<p>Yes. There should be a specific requirement for Horizon to submit details of the proposed sports and leisure facilities (including other details). This is essential not only to ensure that the on-site facilities are adequate (in terms of provision) and acceptable (in terms of impacts), but also to ensure that there is no additional off-site impact on sports and leisure provision.</p> <p>The IACC have raised concerns in its LIR with regards to the building specification and quality of the on-site provision. These must be adequate and attractive to the workers to prevent 'over spill' of impacts into the local communities.</p>
Q2.4.35	The Applicant and Land and Lakes		<p>WN23 – Site Campus Decommissioning Plan Land and Lakes want a trigger either in 9 years from commencement or after occupation falls to a certain level.</p> <p>What is the Applicants view?</p>	
Q2.4.36	The Applicant and IACC		<p>OPSF5 – Operational car and cycle parking IACC wants cycle parking to be provided /it wants certainty that suitable levels of parking provision would be provided/and that electric charging points are provided.</p> <p>(Title still includes reference to cycle parking despite Applicants response at D2.)</p> <p>Has progress been made in reaching agreement between the parties?</p>	<p>There was agreement between IACC and Horizon during a meeting on 1st February 2019 that the cycle parking and electric car points should replicate standard practice for a normal planning application. Planning Policy Wales ed 10 paragraph 4.1.39 requires a minimum of 10% ev charging points for non-residential development.</p> <p>The cycle parking numbers and electric charging spaces will still need to be agreed.</p>
Q2.4.37	The Applicant and IACC		<p>PR5 - Operational car and cycle parking IACC wants certainty that suitable levels of parking provision would be provided. The Applicant refers to the CoCP para 5.10.1.</p> <p>Are the parties still in disagreement and if so, why?</p>	<p>PR5 identifies that a total of 25 cycle storage spaces will be provided and available. IACC is concerned that this would be insufficient for potential demand.</p> <p>There was agreement between IACC and Horizon during a meeting on 1st February 2019 that the wording in the CoCP needs to be revised to include the monitoring of the use of cycle parking (storage for 25 cycles) to assess adequacy of provision. If the monitoring identifies an undersupply of cycle spaces, evidenced by cycle parking elsewhere within the Dalar Hir P&R site, more cycle parking spaces will need to be provided.</p>
Q2.4.38	IACC		<p>PR6 – Park and Ride decommissioning strategy Is IACC content with the drafting of this provision? If not, what alternative wording would be acceptable?</p>	<p>No, the IACC is not content with the drafting of this provision. the IACC would prefer:</p> <p>PR6 Park and Ride facility decommissioning strategy (1) <u>No development of the Park and Ride shall commence until an outline decommissioning strategy has been approved by the IACC.</u></p>

Reference	Respondent:	Location:	IACC RESPONSE	
				<p>(2) Decommissioning of the Park and Ride facility must not commence until a decommissioning strategy has been approved by IACC.</p> <p>(3) A decommissioning strategy under sub-paragraph (2) must be submitted to IACC for approval no later than <u>six</u> months prior to the anticipated Unit 2 Commissioning Date, unless otherwise agreed with IACC, and must include details of—</p> <p>(a) the timeframes for decommissioning, removal, restoration and maintenance works;</p> <p>(b) restoration and maintenance of structures to remain within watercourse;</p> <p>(c) reinstatement of habitats affected by the Park and Ride facility;</p> <p>(d) proposed works to return the land to agricultural use; and</p> <p>(e) the <u>an environmental management, aftercare and maintenance plan including a minimum aftercare and maintenance period of not less than five years; together with an explanation of how this maintenance will be undertaken and funded by the undertaker</u> agreed with IACC.</p> <p>(4) Any decommissioning strategy submitted under sub-paragraph (3) must be in general accordance with the Wylfa Newydd CoCP and the Park and Ride facility sub-CoCP.</p> <p>(5) Decommissioning of the Park and Ride facility and restoration of the site must be undertaken in accordance with the decommissioning strategy approved under subparagraph (2), unless otherwise approved by IACC.</p> <p>(6) A decommissioning strategy will not be required to be submitted under subparagraph (3) where IACC has granted, or resolved to grant, a planning permission for the ongoing use of the Park and Rule facility.</p> <p>The IACC has based these comments on revision 3 of the dDCO [REP2-020] as the most recent version available at the time of drafting.</p>
Q2.4.39	The Applicant and IACC		<p>LC3 (4) Maintenance of landscaping</p> <p>Applicant considers that it is not necessary to have a separate landscaping requirement or scheme given what it describes as “the relatively small size of the site”.</p> <p>IACC disagrees and does not accept the site is small.</p> <p>What would prevent a new requirement for a landscaping scheme to be submitted/approve to IACC for works at the Logistics Centre?</p>	<p>IACC sees nothing that prevents imposition of a requirement for a landscaping scheme to be submitted to and approved by IACC in respect of initial works and subsequent maintenance in relation to the logistic centre. What might be considered relatively small with reference to the main site campus is not necessarily small of itself. A requirement of this nature is not a disproportionate regulatory step and would see this associated development site being treated in a similar way to others.</p> <p>The IACC would suggest that this requirement should be:</p> <p>LC[X] Landscaping plan</p> <p>(1) No development of the Logistics centre will commence until a landscaping plan for the Logistics Centre has been approved by the IACC.</p> <p>(2) The landscaping plan to be submitted under sub- paragraph (1) must include details of:</p>

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Reference	Respondent:	Location:	IACC RESPONSE	
				<p>(a) Specifications and construction drawings for the security fence;</p> <p>(b).location, number, species, provenance, size and planting density of any proposed planting and seeding;</p> <p>(c) cultivation, importing of materials and other operations to ensure plant establishment;</p> <p>(d) proposed finished ground levels;</p> <p>(e) the locations and dimensions of all hard landscape elements including but not limited to: surfacing materials, means of enclosure or boundary treatments, external and street lighting, street furniture, paving, seating, signage, etc;</p> <p>(f) details of existing trees, hedgerows, scrub, grasslands, cloddiau and stone walls to be retained, with measures for their protection during the construction period;</p> <p>(f) implementation timetables for all landscaping works; and</p> <p>(g) a programme of operations for the construction and maintenance of the hard landscape scheme for the full duration of the project, which programme shall include all planting outside the security fence to be undertaken in advance of the commencement of construction</p> <p>(3) The landscaping of the Logistics Centre must be undertaken in accordance with the plans and details approved under sub-paragraph (1), unless otherwise approved by IACC.</p> <p>(4) Any tree, hedgerow or shrub planted as part of an approved landscaping plan under sub-paragraph (1) that, within a period of ten years (for trees) or five years (for hedgerows and shrubs) after planting, is removed, dies or becomes, in the opinion of IACC, seriously damaged or diseased, must be replaced in the first available planting season with a specimen of the same species, provenance, and size as that originally planted, unless otherwise approved by IACC.</p> <p>(5) Any vegetation sown as part of an approved landscaping plan under sub-paragraph (1) that, within a period of five years after sowing, is removed, dies or becomes, in the opinion of IACC, seriously damaged or diseased, must be reinstated in the first available sowing season with seeds of a species and provenance to be approved by IACC.</p>
Q2.4.40	The Applicant		<p>LC6 What is the Applicants response to the following:</p> <p>1) WG drafting insert to include A55. 2) L6(1) 100 HGVs should be a minimum. 3) inclusion of a wider definition of emergency to hold vehicles at the Logistics Site or WN for example due to closure of Britannia Bridge as opposed to parking on the highway.</p>	
Q2.4.41	The Applicant and IACC		<p>LC7 Applicant has amended the drafting of this at D1.</p> <p>IACC does not consider that the amendments address the issues it set out at D2.</p>	<p>The IACC acknowledge that welcome additions to this requirement were made. However the IACC still considers that it is not sufficient. The IACC seeks the following further amendments;</p> <p>LC7 Logistics decommissioning strategy</p>

Reference	Respondent:	Location:	IACC RESPONSE	
			<div>1) What are the matters that are in dispute? 2) How could these be overcome? 3) What drafting would overcome the objections of IACC?</div>	<div><div>(1) No development of the Logistics Centre shall commence until an outline decommissioning strategy has been approved by the IACC.</div><div>(2)Decommissioning of the Logistics Centre must not commence until a decommissioning strategy has been approved by IACC. (3) A decommissioning strategy submitted under sub-paragraph (2) must be submitted to IACC for approval later than six months to the anticipated Unit 2 Commissioning Date, unless otherwise agreed with IACC, and must include details of— (a) the timeframes and hours of decommissioning, removal and restoration works for legacy use; (b) retainment of views between the Ty Mawr Standing Stone and the Trefignath Burial Chamber Scheduled Monuments; and (c) the retention of any buildings or structures, where appropriate; and (d) the retention of any existing landscaping works and features; and (e) a handover environmental management, plan aftercare and maintenance plan agreed with IACC . (4) Any decommissioning strategy submitted under sub-paragraph (3) must be in general accordance with the Wylfa Newydd CoCP and Parc Cybi Logistics Centre sub-CoCP. (5) Decommissioning of the Logistics Centre and restoration of the site must be undertaken in accordance with the decommissioning strategy approved under subparagraph (2), unless otherwise approved by IACC. (6) A decommissioning strategy will not be required to be submitted under subparagraph (2) where IACC has granted, or resolved to grant, a planning permission for the ongoing use or redevelopment of the Logistics Centre.</div></div>
Q2.4.42	The Applicant and WG		<div>Application of Marine and Coastal Access Act 2009 WG propose a new article as below. "Application of Marine and Coastal Access Act 2009 [43].—(1) This Order is subject to the provisions of Part 4 of the 2009 Act and any licence granted pursuant to that Part and is without prejudice to the powers of the Welsh Ministers under that Part. (2) No provision of this Order obviates the need to obtain a marine licence under Part 4 of the 2009 Act or to comply with the conditions of any marine licence and nothing in this Order in any way limits the enforcement powers in respect of a marine licence (3) In the event of any inconsistency between the provisions of this Order and a marine licence, then the terms of the marine licence shall take precedence." This goes further than the Swansea Bay DCO because it</div>	

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Reference	Respondent:	Location:	IACC RESPONSE	
			<p>doesn't specifically identify the articles/powers/requirements relating to marine works and it deals with inconsistencies.</p> <p>Swansea Bay DCO Application of Marine and Coastal Access Act 2009 16.—(1) Articles 17 to 19 are subject to the provisions of Part 4 of the 2009 Act and any licence granted pursuant to that Part and are without prejudice to the powers of the Welsh Ministers under that Part. (2) No provision of this Order obviates the need to obtain a marine licence under Part 4 of the 2009 Act or to comply with the conditions of any marine licence.</p> <p>What are the Applicant's views regarding inclusion of this Article in the DCO?</p>	
Q2.4.43	The Applicant and WG		<p>Schedule 19 Does the Applicant wish to make any further comments regarding the proposal that the Welsh Government should be the appellate body as it is for planning applications?</p>	
Q2.4.44	The Applicant, WG and IPs		<p>Historic Environment – requirement for recording/assessment</p> <p>WG has proposed a new requirement. The following observations and comments are made as below:</p> <p>16 (2) "The scheme [submitted and approved - aren't these words redundant?] must be in accordance with"</p> <p>16 (5) "Any archaeological investigations [implemented - isn't this word redundant?] .."</p> <p>16 (5) (b) .."by Cadw in consultation with Cadw" [how does this work? clarify the different roles of Cadw here?]</p> <p>16(5) (b) ..."unless otherwise agreed with the IACC" [arguably if this tailpiece relates to the whole of the requirement this allows IACC to dispense with the need for the scheme altogether].</p> <p>Do IPs wish to comment?</p>	<p>16 (2) IACC agrees that these words are redundant</p> <p>16(5) This wording is necessary in order to ensure implementation of / compliance with the WSI.</p> <p>16 (5) (b) 'in consultation with Cadw' is designed to allow Cadw the opportunity to comment on any proposals for in situ preservation and where appropriate (where they meet the scheduling criteria and are of national importance) designate them as scheduled monuments in order to provide robust protection.</p> <p>16 (5) (b) 'unless otherwise agreed' is meant to allow flexibility after the WSI is approved rather than resubmission of a new WSI. However, IACC agrees that that this does in theory allow IoACC to dispense with the scheme altogether.</p> <p>IACC would wish to comment further on the wording of the new requirement as proposed by WG;</p> <p><i>16 (3) The scheme must identify any areas where further archaeological investigations are required and the nature and extent of the investigation required in order to preserve by knowledge or in-situ any archaeological features that are identified.</i></p> <p>Confirmation is required as to what is meant by archaeological investigations and archaeological features i.e. that this includes all historic assets including below ground archaeological remains or deposits, above ground earthworks or other features, historic buildings, landscapes and gardens.</p> <p><i>(4) The scheme must provide details of the measures to be taken to protect record or preserve any significant archaeological features that may be found.</i></p>

Reference	Respondent:	Location:	Question:	IACC RESPONSE
				IACC suggest that the word 'significant' is removed. All archaeological features will be preserved either in situ or by record. The level of record or the requirements for that record will be proportionate to the significance of the remains but it is not only 'significant' remains that will be subject to mitigation.
Q2.4.45	The Applicant and NRW		Provide an update on progress re the charging of fees in relation to NRW's role as discharging authority for certain requirements; and provisions for developer contributions to NRW for monitoring and implementation during construction and operation (associated with its proposed role as discharging authority below Mean High Water Springs).	
Q2.4.46	The Applicant, NWP and NWFR		Several IPs have expressed support for an Emergency Services Engagement Group. Do IPs wish to comment? If such a group were to be formed, how could this be secured in the DCO?	
Q2.4.47	The Applicant		Please respond to the comments made by Trinity House at REP4-056 in response to First Written Questions.	
Q2.4.48	The Applicant and IACC		1) When will the amended Protective Provisions be sent to IACC Highways? 2) What would prevent IACC Highways reaching an agreed position by the next DCO hearing in March?	IACC has received and reviewed the draft protective provisions. The IACC's interest in is retaining adequate control of the operational highway to ensure that the public highway network can be effectively managed and to ensure safety for the public, that any works carried out are to an acceptable standard and that public funds do not have to be used to remedy any harm caused by the project works. The IACC is proposing amendments to the draft protective provisions to meet these aims. Agreement will only not be able to be reached where Horizon does not accept the Highway Authority's legitimate need and responsibility to manage the public highway network and will not agree PPs which achieve this.
Q2.4.49	The Applicant		1) Please provide draft protective provisions proposed for Schedule 15 not currently included in the DCO in addition to the finalised Protective Provisions with Magnox. 2) Please provide a further update on negotiations on the protective provisions and detail the proactive steps that are being taken to reach agreement during the Examination.	3)
	Part 1		SECTION 106	
Q2.4.50	The Applicant, IACC, GCC	Q	Provide an example of another project/S106 agreement where similar management mechanisms to the WNPOP have been used.	IACC is not able to provide an example of another project/section 106 agreement management mechanism similar to the WNMPPOP that has been used in factually similar circumstances to those at Wylfa Newydd. IACC does not think it will assist the

Reference	Respondent:	Location:	IACC RESPONSE	
	and WG			ExA for it to refer to cases that it does not believe are appropriate comparators.
Q2.4.51	IACC, GCC, WG, BCUHB, NWP, NWFR and PHW	Q	<p>In the long term there would be an increase in revenue from Council and Business Tax should the DCO be consented. Would this be used to fund additional services required as a result of the development? At the ISH on the 7 January it was indicated that this would be reflected in the S106 as a number of the contributions sought would be for short term and/or interim measures to cover any shortfall in service provision that might arise before the increase in revenue could be delivered. Indicate which contributions this would apply to. Where a contribution is being sought to cover an existing service long term, why would this be necessary?</p>	<p>IACC is still in the process of negotiating the detail of the s106 but at this interim stage believes that the focus of mitigation payments is firmly on short-term need generated by the effects of construction prior to any ultimate increase in Council revenues having any effect in terms of responding to the demands created by the development.</p> <p>In the instances where permanent provision, particularly of infrastructure or facilities is the best practical solution to meet a temporary (albeit substantial) demand arising from construction, then any long term benefit is properly considered as a legacy benefit from the project.</p> <p>The contingency elements of the s106 will also import flexibility into mitigation provision such that if it is shown that Council revenue from incoming workers is itself providing for the impact of such migration, there would be no need to call upon those reserves of contingency mitigation funding.</p> <p>In the long term, the IACC does not anticipate a substantial increase in Council Tax or Business Tax income should the DCO be granted.</p> <p>It is anticipated that 85% of the workforce during the operational phase will be local people.</p> <p>As such, they will already be living in the community and already contributing to local Council taxation.</p> <p>Non-Domestic (business) Rates (NDRs) in Wales are collected and paid into the Welsh Government's Non-Domestic Rates Pool.</p> <p>They are then redistributed to local authorities as part of the local government revenue settlement each year.</p> <p>The distribution is made pro rata based upon adult population in each council's area, using the following formula.</p> $(F \times 95\%) \times \frac{G}{H}$ <p>Where:- F is the total distributable amount available for any given financial year; G is the resident population aged 18 years and over in each council area for the period up to the end of June of the previous year (taking into account the results of the 2011 Census and as derived from estimates by the Office for National Statistics; and H is the population of Wales on the same basis as set out in respect of G.</p> <p>Local authorities in Wales have no power to impose or levy any form of local taxation from businesses for retention to be spent locally.</p> <p>Given that redistribution is on a population based formula there is, therefore, no direct link between the amount of NDR paid by a particular business and the taxation income received by a local authority hosting that business.</p>
	Part 2		Compulsory Acquisition	
Q2.4.52	Applicant		In regard to the revised Book of Reference [REP2-026, REP2-027 & REP2-028], the Applicant is requested to provide a completed and updated Compulsory Acquisition Objections Schedule. (See the updated copy at Appendix 1 of this document, which has one additional entry to that previously returned by the	

Reference	Respondent:	Location:	IACC RESPONSE	
			Applicant as REP2-010)	
Q2.4.53	The Applicant		<p>With reference to The Funding Statement [APP-033] explain the relationship between (a) Hitachi Ltd and Hitachi Nuclear Projects Development Europe Ltd and (b) Horizon Nuclear Power Ltd and Horizon Nuclear Power Wylfa Holdings Ltd and between the Hitachi companies and the Horizon Group in terms of:</p> <ol style="list-style-type: none">1) The constitution of the board of directors for each company.2) Corporate governance arrangements between the companies, including the decision-making hierarchy for the Wylfa Newydd project.3) Where does responsibility for signing off the Final Investment Decision rest?4) Financial resources and access to project finance and investment for each of the companies.	
Q2.4.54	The Applicant		<p>The letter of the 21 January 2019 from Horizon Nuclear Power Ltd [AS-039] states that: 'the company will be moving towards a suspended state organisation by the end of March 2019'; and that: 'with respect to the Development Consent Order (DCO) currently in progress Horizon will continue with the on-going programme whilst it seeks opinion from Stakeholders and other interested parties on the best way forward'.</p> <p>The following should be noted:</p> <p>Planning Act 2008 105 [Decisions in cases where no national policy statement has effect] ¹</p> <p>(1) This section applies in relation to an application for an order granting development consent [if section 104 does not apply in relation to the application] ² .</p> <p>(2) In deciding the application the Secretary of State must have regard to—.....</p> <p>(c) any other matters which the Secretary of State thinks are both important and relevant to the Secretary of State's decision.</p> <p>Statement on Energy Infrastructure: Written statement - HLWS316</p> <p>Planning Act 2008 122 Purpose for which compulsory acquisition</p>	

Reference	Respondent:	Location:	IACC RESPONSE	
			<p>may be authorised</p> <p>(1) An order granting development consent may include provision authorising the compulsory acquisition of land only if the [Secretary of State] ¹ is satisfied that the conditions in subsections (2) and (3) are met.</p> <p>(2) The condition is that the land—....</p> <p>(3) The condition is that <u>there is a compelling case in the public interest for the land to be acquired compulsorily.</u></p> <p>Planning Act 2008 - Guidance related to procedures for the compulsory acquisition of land</p> <p>Resource implications of the proposed scheme - paragraph 17:</p> <p><i>Any application for a consent order authorising compulsory acquisition must be accompanied by a statement explaining how it will be funded. This statement should provide as much information as possible about the resource implications of both acquiring the land and implementing the project for which the land is required. It may be that the project is not intended to be independently financially viable, or that the details cannot be finalised until there is certainty about the assembly of the necessary land. In such instances, the Applicant should provide an indication of how any potential shortfalls are intended to be met. This should include the degree to which other bodies (public or private sector) have agreed to make financial contributions or to underwrite the scheme, and on what basis such contributions or underwriting is to be made.</i></p> <p>Compelling case in the public interest: paragraphs 12 and 13:</p> <p><i>In addition to establishing the purpose for which compulsory acquisition is sought, section 122 requires the Secretary of State to be satisfied that there is a compelling case in the public interest for the land to be acquired compulsorily.</i></p> <p><i>For this condition to be met, the Secretary of State will need to be persuaded that there is compelling evidence that the public benefits that would be derived from the compulsory acquisition will outweigh the private loss that would be suffered by those whose land is to be</i></p>	

Reference	Respondent:	Location:	IACC RESPONSE	
			<p><i>acquired. Parliament has always taken the view that land should only be taken compulsorily where there is clear evidence that the public benefit will outweigh the private loss.</i></p> <p>Other matters – paragraph 19</p> <p><i>The high profile and potentially controversial nature of major infrastructure projects means that they can potentially generate significant opposition and may be subject to legal challenge. In addition, Applicants will need to be able to demonstrate that:</i></p> <ul style="list-style-type: none"><i>• any potential risks or impediments to implementation of the scheme have been properly managed;</i> <p>The Applicant should make reference as appropriate to the above legal and policy context in answering all the questions below.</p>	
Q2.4.55	The Applicant	Q	In view of the current uncertainties about deliverability and funding, and as necessary providing a supplement to the Statement of Reasons, what is the justification for the compulsory acquisition request?	
Q2.4.56	The Applicant	Q	<p>Without prejudice to any conclusions that the ExA may draw in making its recommendation, following responses to Q2.25.1 and Q2.25.2, and as necessary providing a supplement to the Funding Statement [APP-033]</p> <ol style="list-style-type: none">1) What is the current estimate of the cost of the Wylfa Newydd project?2) What is the current estimate of the cost of Compulsory Acquisition (CA), including compensation for Category 3 persons and repair of possible damage during construction?3) What is the current estimate for decommissioning costs?4) What is the source of project, CA and decommissioning funding and by what mechanism would it be secured and guaranteed through the dDCO and any planning obligations; noting that adequate funding should be available to enable the CA powers to be exercised within the statutory period following the order being made, as set out in Regulation 3(2) of the Infrastructure Planning (Miscellaneous Prescribed	

Reference	Respondent:	Location:	IACC RESPONSE	
			<p>Provisions) Regulations 2010.</p> <p>5) What financial contingency measures are in place to ensure that, should the project be abandoned during or following the Site Preparation and Clearance Works or during the construction period, resources would be available to restore and secure the Wylfa Newydd site?</p> <p>6) How would these contingency measures be secured; noting that Paragraph 1.2.14 of [REP – 024] states: the draft SPC s106 makes provision for a Parent Company Guarantee (PCG)/Escrow account and/or restoration bond to be secured in the event that the development consent is not implemented?</p>	
Q2.4.57	The Applicant	Q	In addition to the Statement of Reasons and Funding Statement, what application documents and plans would need to be updated to respond to current circumstances (in the light of the letter dated 21 January 2019) and when would the Applicant consider that this information will be available?	
Q2.4.58	The Applicant	Q	In view of the uncertainties and the additional information sought is the Applicant satisfied that the ExA will have sufficient evidence to reach conclusions and make findings within the statutory timetable, having regard to the ExA's duty under section 98 (1) and the Secretary of State's powers under section 98 (4) to extend the timetable?	
Q2.4.59	The Applicant	All	Given the IACCs written representation in section 12.0 of REP2-218, and the response on Page 1-74 of REP3-019, should the County Council be included on the Compulsory Acquisitions Schedule [REP2-010 and/or REP2-011]?	
Q2.4.60	IACC and the Applicant	All	With reference to paragraph 12.0.3 of the IACCs written representation [REP2-218] and the Applicant's response in REP3-019, please provide an update on the discussions referred to, and the matters included / outcomes from the discussions.	The IACC understands that Horizon proposes to make an amendment to the dDCO to address this point however to date IACC has not had sight of the proposed amendment and cannot comment until that is provided.
Q2.4.61	The Applicant	All	Please comment on the implications of the current halting/pausing of work on the Wylfa Newydd project for the case made within the Statement of Reasons [APP-032] in support of the proposed compulsory acquisition of land, and which addresses the need for the development. Also, provide any necessary	

Reference	Respondent:	Location:	IACC RESPONSE	
			update/clarification in regard to the answer provided in REP2-375 for First Written Question Q4.0.25.	
Q2.4.62	The Applicant	WF	In relation to the Book of Reference 2/3 Rev. 3.0 [REP2-027] and the Schedule of Compulsory Acquisition Objections (a copy provided as REP2-010), should the people who have submitted REP4-050 be included in the Schedule of Compulsory Acquisition Objections?	
5.	Habitats Regulation Assessment			
Q2.5.1	The Applicant	WF	In its response to the ExA's question 5.0.17 [PD-009] the Applicant advised that the assessment of decommissioning in the shadow HRA [APP-050] was to set out a series of assumptions in Table 5-6 regarding the nature of the works likely to be required during decommissioning. The assumptions in Table 5-6 are stated to be the anticipated main features and characteristics of the decommissioning works rather than additional measures to avoid or reduce effects. However, the measures listed in the table include measures such as the invasive Non-Native Species strategy and controls of the timing of works which have been treated as mitigation measures in the assessment of construction and operation works. Can the Applicant explain this apparent inconsistency in approach?	
Q2.5.2	The Applicant	WF	Can the Applicant respond to NRW's advice [REP2-325, page 124] that the Applicant should issue a note confirming that it has taken account of the CJEU's judgement in the Edel Grace, Peter Sweetman v An Bord Pleanala case?	
Q2.5.3	NRW, NT, RSPB and NWWT		During the Issue Specific Hearing on 10 January 2019, the Applicant suggested that declines in productivity at the Cemlyn Bay Tern colony could be linked to density dependent effects resulting from the overall increase in Tern numbers, and that this might also be the reason for terns taking back several food items at once. What are your comments on these points?	
Q2.5.4	NRW, NT, RSPB and NWWT		Sandwich Tern has been described as a species which is very sensitive to disturbance. Could the parties identify the sources of evidence which support this statement?	
Q2.5.5	NRW, NT, RSPB and		During the Issue Specific Hearing on 10 January 2019, the Applicant described how noise from construction	

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	NWWT		would be attenuated over the distance between the main power station site and the Tern colony at Cemlyn Bay and would be experienced as background at the colony. If you do not agree with this characterisation of the construction noise environment please could you explain why?	
Q2.5.6	Applicant, NRW, RSPB, NWWT and NT		Could the parties provide references (including copies of abstracts where relevant) for any scientific literature that deals directly with the effects of construction disturbance on Sandwich Terns or closely related species?	
Q2.5.7	Applicant		In relation to the use of the 'red' and 'amber' noise levels described in REP3-048, could the Applicant: 1) explain how the red and amber noise levels would be defined? 2) How would the amber noise level be defined to ensure that there would be enough time to take action before the red noise levels are reached?	
Q2.5.8	NRW, NWWT, RSPB and NT		With regard to disturbance from visual stimuli, the Applicant has stated that there would be no construction work undertaken within 500m of the nesting islands between 15 April and 15 May with no bulk earthworks undertaken within 500m of any known active Tern nests thereafter. Does this address any of the parties concerns? If not, what additional measures would be required?	
Q2.5.9	NRW		The environmental NGOs have raised concerns about the potential effect of increased predation on the Tern colony as a result of predators being displaced by the main power station works [REP2-318, 2-348 and 2-360]; the RSPB has suggested that this represents an additional likely significant effect of the SPA [REP2-358]. What are NRW's views?	
Q2.5.10	Applicant		Without prejudice to the ExA's final recommendation, please provide the following in relation to the Angelsey Terns SPA: i) The reasons that there would be no alternative solutions and imperative reasons of overriding public interest to carry out the proposed development. ii) An update on the development of compensatory measures for the SPA.	

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			Question:	
Q2.5.11	NRW		In response to the ExA's FWQ5.0.45, NRW provided links to the conservation objectives for the relevant European sites. Please provide the conservation objectives in full rather than as links.	
Q2.5.12	The Applicant		What mechanism would be used to decide which site activities would stop to reduce noise levels?	
Q2.5.13	The Applicant		Could the Applicant advise if they are aware of other cases where a similar approach to the reactive noise monitoring proposed for WDNA has been used to mitigate effects on a breeding seabird colony?	
Q2.5.14	The Applicant		As part of their Deadline 4 response, the Applicant has provided updated marine works noise modelling based on US National Marine Fisheries Services criteria. Does the submitted document address NRW's concerns?	
6.	Historic Environment			
Q2.6.1	Applicant	WF	<p>Respond to the National Trust's further consideration at Deadline 3 of the heritage asset plans submitted in response to FWQ Q6.0.17 [REP3-056] and in particular to:</p> <ol style="list-style-type: none">1) The earthworks shown on Dwg 60PO80AS _ Q6.0.17_ 01b illustrative main construction activities and Dwg 60PO80AS _ Q6.0.17_ 02 illustrative operational layout.2) The use of the land immediately to the south of Cestyll Garden north of Cemlyn Road during the operational phase.3) The proposed access for Cestyll Garden during the operational period in relation to the historic access and, if this is not to be used, how the proposed use of the construction access during operation would affect the significance of the Garden.4) Access for National Trust to the east of Cestyll Garden, currently the subject of discussion between National Trust and Horizon.5) The planting programme addressed in paragraph 7 of [REP3-056].6) Details of the works planned for the area reserved for 'Laydown / Other construction activities' during site preparation and clearance and construction; including how it is envisaged the area would be	

Reference	Respondent:	Location:	IACC RESPONSE	
			<p>surfaced during the construction period and the temporary surface removed at the end of construction.</p> <p>7) The location and specification of boundary fences during construction on Dwg 60PO80AS _ Q6.0.17_01b illustrative main construction activities.</p> <p>8) The intention for HLT2 - Cestyll Garden - Kitchen Garden and former site of Cestyll House during the operational phase.</p> <p>9) The purpose of the dashed line that runs from the southernmost tip of Cestyll Garden initially south east and then south west which is not keyed.</p> <p>10) Whether woodland would be planted between Felin Gafnan Farmhouse and Cestyll Garden to mitigate views of the construction and operational activities for the residents of Felin Gafnan Farmhouse.</p>	
Q2.6.2	Applicant	WF	<p>Provide an update at Deadline 6 on the following matters in relation to Cestyll Garden and nearby heritage assets addressed in Horizon's Response to the Welsh Government's WR [REP3-034]:</p> <p>1) The commitment for Horizon to work with the landowners and other interested parties to consider appropriate enhancement measures such as greater interpretation, including on-site interpretation boards at the valley garden, enhanced public access to the valley garden, regular maintenance and restoration of the valley garden. (Para. 1.15.4)</p> <p>2) The proposed a deed of covenant with NDC to develop and deliver a Conservation Management Plan for Cestyll Garden and whether agreement on heads of terms for acquisition of a number of land interests, including Cestyll Garden, has been reached.</p> <p>3) The proposed provision of enhanced interpretation in the form of an additional interpretation board at Felin Gafnan.</p> <p>4) The review of what could be practicably achieved in relation to the possible reinstatement of the kitchen garden to its former location or an alternative location; including the possibility of reconfiguring proposed Mound D to the east of the Cestyll Garden driveway.</p> <p>5) How making good damage to the following listed buildings would be secured; the level of financial resource to be reserved for the work and the</p>	

Reference	Respondent:	Location:	Question:	IACC RESPONSE
			<p>mechanism to ensure the work would be carried out in accordance with Cadw and IACC guidance:</p> <ol style="list-style-type: none"> Grade II* Listed Felin Gafnan Corn Mill (Porth y Felin) (Asset 137); Grade II Listed Corn-drying house at Felin Gafnan (Asset 141); Grade II Listed Mill house at Felin Gafnan, Cylch-y-Garn (Asset 144); and Grade II* Church of St Padrig (Llanbadrig) (Asset 26) 	
Q2.6.3	WG; Cadw; IACC	WF	<p>Do the Applicant's responses to Historic Environment issues set out in Horizon's Response to the Welsh Government's WR [REP3-034] provide assurance that the technical and policy tests set out in EN1, EN6, Planning Policy Wales 10, Cadw's published Conservation Principles, Technical Advice Note (TAN) 24: Historic Environment and any other relevant legislation and guidance in respect of the Historic Environment and raised in the WR [REP2-367] have been met? Is the proposed additional mitigation adequate? With particular reference to:</p> <ol style="list-style-type: none"> The substantial harm on Cestyll (Grade II) Registered Park and Gardens and Horizon's proposed mitigation strategy, including the request for a long term, secured and funded Conservation Management Plan covering the forthcoming statutory registered area boundary for Cestyll Gardens and including measures to mitigate impacts associated with the Grade II* Listed Felin Gafnan Corn Mill (Porth y Felin) (Asset 137), Grade II Listed Corn-drying house at Felin Gafnan (Asset 141), and Grade II Listed Mill house at Felin Gafnan, Cylch-y-Garn (Asset 144) to be prepared with and approved by Cadw. Exclusion of the temporary sewerage treatment plant located within Essential Setting of Cestyll Gardens from the Environmental Impact Assessment. The potential impacts and mitigation strategy for buried archaeology within and around the WNDA? The mitigation and restoration strategy for historic buildings during construction and operation, including the Grade II* Listed Felin Gafnan Corn Mill (Porth y Felin) (Asset 137), Grade II* Church of St Padrig (Llanbadrig) (Asset 26) (where additional mitigation has been requested), Grade II corn drying 	<p>1) The applicant's response to the Welsh Government [REP3-034] does not present any of the additional information requested by IACC to provide any additional assurance that the tests set out in NPS EN-1 5.8.14 that <i>'...loss affecting designated heritage assets should require clear and convincing justification...'</i> and at EN-1 5.8.15 that <i>'Where the application will lead to substantial harm to or total loss of significance of a designated heritage asset the IPC should refuse consent unless it can be demonstrated that the substantial harm to or loss of significance is necessary in order to deliver substantial public benefits that outweigh that loss or harm'</i> have been met. There also needs to be a DCO requirement or s106 obligation that <i>"prevents any loss occurring until it is reasonably certain that the relevant part of the development is to proceed"</i> (NPS EN-1, 5.8.17).</p> <p>NPS EN-6 does not provide any general policy guidance regarding nuclear power and the historic environment.</p> <p>PPW10 (December 2018) notes that the <i>"historic environment is a finite, non-renewable and shared resource and a vital and integral part of the historical and cultural identity of Wales ... (and) ... can only be maintained as a resource for future generations if the individual historic assets are protected and conserved"</i> (para 6.1.5). It lists the Welsh Government's specific objectives for the historic environment, including to <i>"preserve the special interest of sites on the register of historic parks and gardens"</i> (para 6.1.6). None of these policy objectives are met under the current proposals.</p> <p>The additional mitigation proposed by the Applicant is welcomed, but there are still some important issues that need to be fully understood.</p> <ul style="list-style-type: none"> It is not clear that the Conservation Management Plan (CMP), and associated works are adequately secured – the mitigation proposals relate to the applicant using 'best endeavours' to deliver the proposed mitigation; IACC has specific concerns for the adequacy of funding suggested in the draft s106 agreement (REP3-042) and has commented separately on that provision; The CMP proposed by the Applicant relates only to the Valley garden, rather than the wider designation and specifically excludes areas of Cestyll within the WNDA; The Applicant has not provided sufficient detail of proposals to restore and

Reference	Respondent:	Location:	IACC RESPONSE	
			<p>house (Felin Gafnan) (Asset 141), Grade II Mill House (Felin Gafnan, Cylch-y-Garn) (Asset 144) and Cafnan House and associated outbuildings (Asset 181) and whether a commitment to restoring any historic buildings which are subject to damage during the construction activities has been made and secured?</p> <p>5) The setting impacts on Trelignath Burial Chamber Scheduled Monument, including the scope and extent of any landscaping and planting measures undertaken and how they help screen the setting of the two scheduled monuments from the Logistics Centre and the long-term restoration plan for the site on completion of the project.</p> <p>If not, why not and what needs to be done to provide the assurance needed?</p>	<p>manage the kitchen garden at Cestyll in the LHMS (REP2-039);</p> <ul style="list-style-type: none"> • The buildings at Felin Gafnan are excluded from the proposed CMP; and • In the absence of the framework provided by a more comprehensive CMP, proposals for mitigation are likely to be ad-hoc and of questionable value. <p>See the IACC LIR (Chapter 17, section 4.4.14 – 4.4.20) for all mitigation measures necessary to compensate for the losses and impacts predicted for Cestyll Garden.</p> <p>Further assurance that the relevant policy tests have been met would be provided by a clearer statement of how the heritage significance of Cestyll has been considered in the design process, a clear statement of how any mitigation would be secured and specific consideration of the concerns set out above.</p> <p>2)</p> <p>In the Applicant's response to the Welsh Government's query [REP3-034] about the exclusion of the temporary sewage treatment plant from the ES, it is stated that the assessment of effects presented in Chapter D11 was based on information presented in the Parameter Plans, parameter tables and Chapter D1. However, none of these identify any development within Cestyll Garden and do not provide any information on the location or scale of the proposed temporary waste water treatment plant. Therefore, there is no evidence that the assessment of effects on Cestyll Garden presented in Chapter D11 took into account the physical and visual impact of the proposed temporary waste water treatment plant which, according to the Marine Licence application drawings, is to be located within the Essential Setting, between the Valley Garden and the Kitchen Garden.</p> <p>The Applicant's response to the Welsh Government's query [REP3-034] about the exclusion of the temporary sewage treatment plant focuses on odour. IACC requests further clarification as to how the Applicant has defined the 'sensitive off-site locations' referred to at 1.15.13 of their response to be assured that this judgement included visitors to Cestyll and Felin Gafnan.</p> <p>This proposed development could also affect Cestyll garden in other ways which are not addressed in this response. These factors could increase the sense of Cestyll becoming subsumed within a wider industrial landscape, reducing historic and architectural interests and include:</p> <ul style="list-style-type: none"> • Contribution to visual change, including the effect that this development may have on the ability to deliver low-level visual screening of construction activity • Noise • Changed water flows in the Afon Cafnan • Proposals for decommissioning and restoration. <p>IACC therefore does not consider that the Applicant's response provides any additional reassurance on this matter.</p> <p>Further assurance that the relevant policy tests have been met would be provided by</p>

Reference	Respondent:	Location:	Question:	IACC RESPONSE
				<p>specific consideration of the concerns set out above.</p> <p>3) The Applicant's response [REP3-034] does not provide any further information than had previously been submitted within the ES. Therefore IACC does not consider that this response provides any assurance that the policy tests on substantial harm to non-designated heritage assets of equivalent significance to scheduled monuments have been met.</p> <p>The Applicant's proposed submission of interim fieldwork reporting is welcomed, but IACC reserves further comment until this material has been submitted to the examination and reviewed by IACC and GAPS.</p> <p>Similarly, IACC reserves further comment on the effectiveness of the proposed mitigation until further detail of the scope and methods of this work has been submitted to the examination by the Applicant.</p> <p>It is accepted that in principle a detailed written scheme of investigation could be an appropriate response, but it is not possible to comment on the effectiveness of such a scheme in practice until further details of its scope and methods are available.</p> <p>Further assurance that the relevant policy tests have been met would be provided by the provision of a statement of overriding need that sets out why the Applicant is unable to provide for the preservation of non-designated heritage assets of equivalent significance to a scheduled monument and provision of more detailed information on the scope and methods of further archaeological mitigation.</p> <p>4) The Applicant's response to the Welsh Government [REP3-034] sets out a commitment to make good any damage to listed buildings at Felin Gafnan. While this commitment is welcomed, it is a restatement of a legal obligation that would apply in any case, and any weight given to it should be limited.</p> <p>It is more concerning that detail of how any effects on the structure of these buildings would be avoided has not been forthcoming.</p> <p>The commitment to provide noise insulation at Llanbadrig is welcomed, but it is not clear that this would necessarily be feasible or would provide a discernible mitigation of the predicted effect.</p> <p>Further assurance that the relevant policy tests have been met would be provided by the provision of further information including an undertaking to:</p> <ul style="list-style-type: none">• Carry out a structural survey of the Grade II* listed Corn Mill in advance of works and carry out any remedial works required to ensure that the basic structure of the building is sound before works commence; and• Provide specific details of monitoring locations, regimes and stand-down procedures in the event that structural damage is identified.

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				<p>IACC also requires further assurance that measures to provide sound insulation at the church of St Padrig are deliverable given the sensitivity of the structure and appearance of the church and would provide an effective response to the predicted change.</p> <p>5) The Applicant's response to the Welsh government [REP3-034] does not contain any further information to that provided in the ES chapter. Therefore, it is not considered that this provides any assurance that appropriate mitigation has been provided.</p> <p>While IACC considers that, in principle, amendments to lighting and screening could reduce harm through change to setting in this case, further assurance that mitigation would be effective would be provided by the submission of details of such measures by the Applicant.</p>
Q2.6.4	Applicant	WF	Respond to the submission by the Welsh Historic Garden Trust [AS-037] or direct the ExA to any previous response.	
Q2.6.5	Applicant	Q	When will the Cultural Heritage Mitigation Strategy referred to in Horizon's response to Interested Parties responses to ExAs First Written Questions [REP3-005] at FWQ6.0.8 be submitted to the Examination?	
Q2.6.6	Applicant	WF	Referring to drawing no. 60PO80AS – Plan of Heritage Assets and Public Access with Illustrative Operational Layout submitted at D2 [REP2-375]; provide cross-sections at 1:500 scale from Porth y Pistyll to the Main Power Station site transecting Cestyll Garden – Valley Garden at worst case and least worst case in terms of the proposed platform height for the Power Station site in the operational phase and show in each case how the transition from the level of the Garden to the Power Station level would be treated as an element in the landscape to minimise its impact on the setting of Cestyll (Grade II) Registered Park and Gardens, the Grade II* Listed Felin Gafnan Corn Mill (Porth y Felin) (Asset 137), Grade II corn drying house (Felin Gafnan) (Asset 141), and Grade II Mill House (Felin Gafnan, Cylch-y-Garn) (Asset 144)	
7.	Landscape and Visual			
Q2.7.1	IACC		Comment on the Applicant's assertion in its response to FWQ 7.0.1 in Horizons response to Interested Parties responses to the ExA's First Round Written Questions [REP3-005] that:	As noted in the IACC response to Q7.0.1 (REP2-153), HNP states (in para 10.4.3, ES Volume B) that a worst-case scenario has been made for each key visual receptor (in the assessment of magnitude) but the same is not stated in the methodology for landscape effects (paras 10.4.38 – 10.4.41 in ES Volume B). HNP states in their

Reference	Respondent:	Location:	IACC RESPONSE	
			<p>'while the IACC claim that "the worst-case scenario has not always been assessed with regards to impacts on historic landscape, landscape character and designations (eg on the AONB, Cestyll Garden and Dame Sylvia Crowe's designed landscape)", this claim is not substantiated.'</p>	<p>response to the IACC response to Q7.0.1 (REP3-005) that "<i>both the landscape and visual assessment for each development is based upon a 'worst-case' development scenario</i>" and it is clear that HNP considers the worst-case development scenario to be the maximum parameters of each development (heights, extents, timescales, etc). IACC are not disputing this.</p> <p>The Council's concerns relate to the way the method has been applied which means that some of the most significant effects on the AONB, Cestyll Garden and Dame Sylvia Crowe's designed landscape have not been expressly identified. These concerns were explained in IACCs LIR and/or answers to the ExA questions and, although HNP has provided further clarifications, we are still of the opinion that some of the most significant effects have not be acknowledged by HNP, as follows:</p> <ul style="list-style-type: none"> • AONB – in ES Appendix D10-6 (APP-197), HNP concludes that <u>significant</u> effects on the AONB during the site prep, construction and operational phases would occur only on the "directly affected area" (i.e. within the WND). The text in Chapter D10 states that there would be indirect effects but does not say whether these would be significant and concludes that indirect effects on the AONB overall (i.e. averaged over the whole AONB) would not be significant. HNP has now confirmed that references to "directly affected area" should read "directly and locally affected area", i.e. HNP agrees that, in addition to the significant direct effects on the AONB within the WND, there would be significant indirect effects on the AONB during the site prep, construction and operational phases within a "locally affected area" of the AONB. However, HNP has not defined what they mean by "locally affected area" and so it is still not clear what parts/extent of the AONB HNP considers would be significantly affected by the development. In order to agree mitigation and compensation measures within the AONB that are proportionate to the impacts predicted, then the extent of the AONB that would be significantly affect should be made clear. As explained in IACCs LIR, in our assessment, <u>significant indirect effects</u> on the AONB as a consequence of development within the WND would extend up to 5km into the AONB, hence the list of potential compensation measures identified in the LIR (Chapter 17). The same concern applies to the effects on the AONB of the AD sites (Site Campus, Parc Cybi, Off-site Power Station Facilities and A5025 off-line highways works) as explained in the LIR (Chapters 18, 20, 21 and 22) and also the Marine Works. • Cestyll Garden – In the assessment of construction effects on Cestyll Garden (ES Chapter D11, paras 11.5.38 – 11.5.39 (APP-130) and ES Appendix D11-6) (App-213), the significant effects are stated to be as a result of the removal of the kitchen garden, the house plot and part of the Essential Setting, potential effects on vegetation (as a consequence of changes in air quality) and noise and visual effects (arising from the construction of the temporary causeway, breakwaters and MOLF). There is no reference to the removal of the gardener's cottage or the original driveway (both of which would also be lost under the current proposals), or to the temporary waste water treatment plant (which would be located within the Essential Setting as shown on the Marine Licence application drawings but not shown on any DCO ES drawings and not referred to

Reference	Respondent:	Location:	IACC RESPONSE	
				<p>in ES Chapter D1) or to the potential for erosion arising from changes in the flow of Afon Cafnan. In the assessment of operational effects on Cestyll Garden (ES Chapter D11, para 11.5.54 and ES Appendix D11-6), the significant effects are stated to be as a result of the presence of the Power Station on the setting of the garden and the presence of the breakwater in the Significant View from the valley garden. There is no reference to the permanent loss of the kitchen garden, the house plot, the gardener's cottage and the original driveway and the proposed changes within the Essential Setting (landform, vegetation, etc). Therefore, it is IACC's opinion that the worst-case effects on Cestyll Garden have not been fully assessed. As with the AONB, it is important that the full extent and nature of the impacts are fully explained and understood so that appropriate mitigation and compensation measures can be agreed.</p> <ul style="list-style-type: none">• Furthermore, the purpose of EIA is not just to identify significant "worst-case" impacts but also to identify ways to avoid such impacts and, as explained in the LIR, it is IACC's opinion that the direct impacts on Cestyll Garden could and should be avoided.• Dame Sylvia Crowe's designed landscape – as explained in the LIR, IACC considers the sensitivity of this landscape to be high (rather than medium) and that HNP has not fully appreciated the magnitude of the cumulative effects that would arise as a consequence of the Power Station and the grid connection (due to the extensive woodland clearance proposed by NGET). Again, the worst-case has not been fully assessed and, consequently, appropriate mitigation and compensation has not been proposed.
Q2.7.2	Applicant	WF	<p>In para. 7.19.4 of its Deadline 2 WR [REP2-325] NRW requests detailed proposals to confirm that the landscape and visual integration with the AONB of the WNDA, (including the Power Station, Site Campus, MOLF and breakwater) has been developed sufficiently and in particular that details of the proposed colour scheme illustrated with elevation drawings and photomontages are submitted. The response at para. 7.77.3 to 7.77.5 [REP3-035] explains the post-consent approval procedures set out in Requirements in the dDCO [REP2-020].</p> <p>In view of the importance of mitigating harm to the AONB by careful design of the appearance of the WNDA illustrate, by way of drawings and photomontages, how the power station might appear in the landscape during operational mode if Design Principles 31, 32 and 32 and the principles set out in paras. 4.1.22 to 4.1.31 of Volume 2 of the Design and Access Statement [REP4-017] are followed.</p>	
Q2.7.3	Applicant	WF	<p>Explain how the following overarching landscape design and mitigation principles set out in the Landscape and Habitat Management Strategy [REP2-039] and</p>	

Reference	Respondent:	Location:	IACC RESPONSE	
			<p>particularly relevant to landscape and visual integration with the AONB, would be developed, consulted on, submitted to IACC and determined prior to the work taking place?</p> <ul style="list-style-type: none">• “A new landscape setting will be created that reflects the existing open, rolling, drumlin landscape character and sense of place, minimizing harm to the setting of the Anglesey Area of Outstanding Natural Beauty (AONB) and North Anglesey Heritage Coast.”• “An appropriate landscape setting will be provided to help integrate a major development through the use of large scale mounding and tree planting to soften views of the Power Station and reduce adverse visual impacts, screening low level buildings and maintaining a natural setting as close to the Power Station as possible.”	
Q2.7.4	Applicant	WF	<p>Referring to NPS-EN1 paras. 5.9.9 to 5.9.11 and the statement in para. 7.77.7 of Horizon’s Response to the WR at Deadline 2 from NRW [REP3-035] that: ‘Horizon considers that in general landscape and visual mitigation is most effectively provided ‘at source’. Explain, in relation to the Isle of Anglesey AONB, how the tests of ‘substantial weight’ to be given to development proposed within nationally designated landscapes and the need to assess ‘any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated’ are met through the dDCO.</p> <p>Why aren’t NRW’s proposals in para. 7.19.6 of its Deadline 2 WR [REP2-325] including: ‘that opportunities are required off-site within the AONB to mitigate/compensate for the development’s significant visual effects’ in order to ‘support the area’s conservation and enhancement policy requirements’; reasonable in the circumstances?</p> <p>Is a more positive response to NPS-EN1 paras 5.99 to 5.9.11 required?</p>	
Q2.7.5	Applicant	FW	<p>In its response to IACC’s answer to FWQ 7.0.5 Horizon state (it) ‘is considering providing illustrative construction visualisations to supplement the current information on construction effects’. [REP3-005].</p> <p>The ExA would find visualisations of the construction</p>	

Reference	Respondent:	Location:	IACC RESPONSE	
			phase helpful in understanding its landscape and visual impacts and the mitigation that is required and ask that these be submitted at Deadline 6.	
8.	Marine Environment			
Q2.8.1	NRW	WD	Is NRW content with the Applicant's approach to controlling marine noise impacts for operations other than piling, in the light of no guidance or best practice being available?	
Q2.8.2	NRW	WD	What is NRW's view on adaptive mitigation in relation to the Water Framework Directive Article 4(7) and the certainty of delivery of appropriate mitigation?	
Q2.8.3	The Applicant		NRW advise [REP4-039, para 3.6.3] that the full Vessel Management Plan (VMP) should be included in the Marine Works Sub-Code of Construction Practice (MWSCoCP), rather than the principles, which the Applicant proposes. Is the Applicant willing to include the details of the VMP?	
Q2.8.4			The Applicant provided an Ecological Enhancements Mitigation Report at D4 which includes an options appraisal for ecological enhancement and revised measures to reduce the effects on rocky reef habitat from a moderate adverse to minor adverse effect. Is NRW and NT content that the mitigation would reduce the effects to minor adverse?	
Q2.8.5	The Applicant		In its D4 submission [REP4-039, para3.9.3] NRW states that there are still some gaps related to invasive non-native species (INNS) that need to be addressed in the final Biosecurity Risk Assessment which should be set out in the detailed MWSCoCP and approved by the discharging authority (in consultation with NRW) as a DCO Requirement. Can NRW explain what these gaps are and how they could be filled? Is the Applicant willing to update the Risk Assessment to include NRW's requirements?	
Q2.8.6	The Applicant		NRW [REP4-039, para3.9.4] requested clarification on the role of the Ecological Clerk of Works with respect to the marine environment and whether the role would be responsible for i) securing adequate environmental controls in the marine environment, and ii) ensuring compliance with risk assessments management plans	

Reference	Respondent:	Location:	Question:	IACC RESPONSE
			and actions required to reduce risks around marine INNS. Can the Applicant and NRW agree on the role?	
Q2.8.7	The Applicant		For Anglesey North coastal water body, NRW requires modelling to show the impacts of cooling water discharge on hydrodynamic processes in the water body [REP4-039, para 3.7.6]. Can the Applicant provide this information?	
Q2.8.8	The Applicant		NRW [REP4-039, para 3.7.10] advises that, given the remaining uncertainty about the risks to Tre'r Gôf Groundwater Dependent Terrestrial Ecosystem if the groundwater level is altered, provision for monitoring and mitigation of groundwater around Tre'r Gôf should be in the Main Site Sub-CoCP. Is the Applicant willing to include this provision in the Sub-CoCP?	
Q2.8.9	The Applicant		NRW advise [REP4-039, para 3.10.2] that for monitoring the entrapment of Section 7 fish, detailed monitoring proposals should be set out in a detailed Code of Operational Practice and approved by the discharging authority, in consultation with NRW, as a DCO Requirement. Is the Applicant willing to include this provision in a CoOP secured in the DCO?	
Q2.8.10	The Applicant		Is NRW content with the conclusion drawn by the Applicant that as a result of the five requests for non-material changes, the cumulative assessment for marine mammals does not change?	
9.	Noise and Vibration			
Q2.9.1	IACC	All	Are there any matters in relation to the noise and vibration associated with the proposed construction activities that would suggest there to be deficiencies in the assessment of the possible effects of noise and vibration across the differing parts (i.e. locations) of the scheme?	The IACC does not consider that there are any deficiencies in the assessment of possible effects of noise and vibration for the project.
Q2.9.2	The Applicant and IACC	ADA	Respond to matters raised within the Land and Lakes representation [REP2-261] regarding noise impacts, or alternatively, highlight where you consider the matters to be already addressed within your evidence.	<p>The IACC note the representation made by Land and Lakes [REP2-261] and the response by Horizon following the ISH on the 7th January [REP4-007 Section 3.1]. In terms of noise impact, Horizon state that the majority of the Site Campus building is estimated to be 35dB(A) or less (compared to Land and a Lakes representation which states noise levels of up to 85dB).</p> <p>Provided that the Site Campus buildings meets the relevant acoustic standards as outlined in Horizon's DCO documentation and provided that the other measures are</p>

Reference	Respondent:	Location:	Question:	IACC RESPONSE
				<p>implemented to further mitigate against noise (and odour) impacts, the IACC are satisfied that noise impacts can be adequately mitigated.</p> <p>However, the IACC would require an additional (seventh) monitoring station to be put in place at the Site Campus to monitor noise effects upon receptors in the site campus. These discussions are ongoing with Horizon as part of the SOCG and Horizon are reviewing this request.</p>
Q2.9.3	IACC & NRW	All	Section 4.10 of NPS-EN-1 addresses pollution control and other environmental regulatory regimes. Would regulation during the construction and operational phases of the proposal be likely to adequately address any potential impacts associated with: waste and materials management; off-site flood risk, bathing water quality at Cemaes; dust and air quality; noise and vibration; and, on soils and geology?	<p>IACC does not believe that existing pollution and other environmental regulatory regimes would be adequate to address potential impacts on matters such as water discharge, dust, air quality and noise. Those environmental codes all are directed at responding to breaches of protection resulting in harm. The effectiveness of all of them, to varying degrees, is influenced by the existence of the development consent authorising activity in the first place.</p> <p>For a project of this size and scale it is entirely appropriate that the development consent (what in other types of development is secured by planning permission) imposes method statements to limit impacts that have been predicted to occur and for which mitigation steps have already been proposed by the Applicant to be incorporated within the development consent order.</p>
Q2.9.4	The Applicant IACC & NRW	All	Paragraph 4.10.8 of NPS-EN-1 states that consent should not be refused on the basis of pollution impacts unless there is good reason to believe that any relevant necessary operational pollution control permits or licences or other consents will not subsequently be granted. Is there good reason to believe that the relevant regulators would be unlikely to grant pollution control permits or licences for the construction and operation of the proposed development?	<p>IACC has no reason to believe that the necessary operational and construction pollution control permits or other licences will not be granted however the mitigation steps that are proposed within the DCO are not intended in any event to duplicate those controls.</p> <p>The Applicant is not in a position to exhibit comprehensive and exhaustive details of construction and operational practices that will be subject to environmental regulations. Accordingly, at this point of considering specific actions to achieve the amenity conditions that are to be achieved, the Examining Authority is simply not in a position to be sure to what extent there would be any potential overlap in regulatory controls. There are no controls being sought by IACC that are in principle matters which are fully regulated outside of the DCO process. Were that to have been the case, it would have been inappropriate to have considered those within the examination process or for subsequent approval, but no such situation pertains.</p>
Q2.9.5	The Applicant & NRW	WA	Section 2.5 of the Wylfa Newydd Code of Operational Practice Rev 2.0 [REP2-037] refers to the obtaining of an Environmental Permit for the operation of the Power Station. In relation to the Mitigation Route Map (Rev 2.0) [REP2-038], is the scope of NRW's role (and that of the ONR) in the regulation of emissions from the Power Station clearly set out?	
10.	Socio Economic			
	Accommodation			
Q2.10.1	Applicant	ADA	At what phase would the central amenity block be delivered? If it is not in the first phase what would be the interim arrangements for medical, social and recreational functions at the Temporary Workers Accommodation	

Reference	Respondent:	Location:	IACC RESPONSE	
			(TWA)?	
Q2.10.2	Applicant	ADA	Provide further evidence of how high quality accommodation at the TWA would be provided, in particular reference to how concerns regarding noise and smell would be managed.	
Q2.10.3	Applicant	ADA	How would the TWA become the 'accommodation of choice' for the majority of the construction workforce?	
Q2.10.4	Applicant	ADA	Given the cost of accommodation on Ynys Môn, how would the TWA be priced to ensure that it would be affordable and the first choice for the majority of workers?	
Q2.10.5	Applicant	ADA	Given the concerns raised by the IACC, GCC and the WG regarding demand on existing housing stock and tourist accommodation could the TWA be made bigger and/or be retained for longer?	
Q2.10.6	Applicant	ADA	Explain why procurement, design and construction issues would delay the timescale for delivery of the TWA– please provide further detail.	
Q2.10.7	Applicant, IACC GCC and WG	ADA	What should the minimum occupancy levels for the TWA be and how should they be secured?	The IACC, GC, WG and Horizon have agreed an average occupancy rate of 85% for each phase of the TWA. This will be secured in the s.106 Agreement.
Q2.10.8	L&L	ADA	The sites held by L&L are not within the order limits. However, at the ISH it was suggested that a 'Grampian' style requirement could potentially be used. Provide further explanation including an example of appropriate drafting or a provision for the dDCO.	
Q2.10.9	L&L	ADA	1) Could/would you implement your planning permission without a commercial agreement with the Applicant being in place? 2) If your planning permission was not restricted by the need to be used for TWA what would prevent you building out your scheme?	3)
Q2.10.10	Applicant and L&L	ADA	Can you each provide a table detailing what your scheme for TWA would physically deliver including but not limited to number and type of units proposed; facilities that would be provided on site (eg leisure, health and social) and number of parking spaces proposed. Example table provided at Appendix 2.	

Reference	Respondent:	Location:	Question:	IACC RESPONSE
Q2.10.11	Applicant	ADA	At the ISH in October you indicated that the provision of TWA on-site would save HNP £30 million per 1,000 workers per year. Provide a further breakdown of how this figure was reached and the effect of this in relation to the financial viability of the application?	
Q2.10.12	IACC	ADA	At the ISH on 7 January 2019 you indicated you considered the need for a Requirement limiting the number of workers on site until the TWA became available. Can you provide further detail, including suggested drafting of a relevant provision and an explanation regarding the proposed threshold levels?	<p>The IACC have discussed and agreed this in principle with Horizon. However, this agreement has not translated into the latest Phasing Strategy [REP4-014] or into a DCO Requirement.</p> <p>The latest Phasing Strategy [REP4—014] proposes exceedance thresholds for each phase of the site campus. In summary, these consist of:</p> <ul style="list-style-type: none"> • Deliver the first 1,000 beds of Site Campus prior to exceedance of 2,200 non-home based workers; • Deliver further 1,000 beds prior to exceedance of 4,200 non-home based workers, and • Deliver the final 2,000 bed spaces prior to the exceedance of 6,700 non-home based workers. <p>On request of the ExA, the IACC have provided comments to Horizon on the revised Phasing Strategy that will be submitted by Horizon at Deadline 5. The IACC are not satisfied with the proposed exceedance thresholds as they would result in an unacceptable impact on the existing private accommodation sector. For example, Horizon have stated throughout their DCO application that the peak construction workforce will be 8,500. If 2,000 of these are “local” home based workers, then 6,500 of these would be non-home based. This would mean that this exceedance threshold would never be triggered.</p> <p>In response to the ISH Action Points, the IACC jointly prepared a paper with the WG and GC on housing and accommodation [REP4-034 Annex 1.1]. In this response, the IACC presented an alternative Phasing Strategy that would reduce pressure on the private sector and allow a more evenly balanced programme for additional supply of new accommodation to be achieved.</p> <p>Horizon’s strategy is based upon first absorbing vacancies from the private rental and tourism sector, and only then constructing TWA: over 80% of the identified 3,000 bedspaces in the KSA would be absorbed from the private sector by Y4Q4, when the first 1,000 bedspaces in TWA come on-stream. Horizon have focussed on meeting peak demand, and have failed to consider the impact on the housing and tourism markets of the very rapid build-up of workforce numbers. Horizon would require 1,600 bed spaces in the twelve months of Y4, with 1,200 of these in the six months of Y4Q3 and Y4Q4, and 700 of these within the single quarter of Y4Q4.</p> <p>The alternative proposal by the IACC, WG and GC can be summarised as:</p> <ul style="list-style-type: none"> • 500 bedspaces by Y3 Q3

Reference	Respondent:	Location:	IACC RESPONSE	
				<ul style="list-style-type: none"> • 1,000 bedspaces by Y4 Q2 • 2,500 bedspaces by Y4 Q4 • 3,000 bedspaces by Y6 Q3 • 4,000 bedspaces by Y7 Q1 <p>This more incremental build-up of TWA would result in less impact on the private accommodation (particularly in the years leading up to peak) and would better align with the build-up on the non-home based construction workforce. However, as discussed at the ISH on the 7th January, Horizon have confirmed that they cannot deliver the first 1,000 bedspaces until Y4 Q4.</p> <p>Other than citing commercial and procurement reasons, Horizon have not provided any evidence that they cannot deliver the Site Campus earlier. As stated by the IACC at the ISH, Anglesey should not have to bear the risk and effects of thousands of non-home based construction workers flooding the existing private accommodation market whilst Horizon are constructing the TWA.</p> <p>Furthermore, given the recent announcement by the Applicant confirming the delay of the project, this provides even more time for Horizon to develop and deliver to the alternative phasing strategy.</p>
Q2.10.13	IACC, GCC and WG	Q	At the ISH on 7 January 2019 you raised concerns regarding the actual turnover/availability of stock in the private rented sector indicating you thought it was less than that suggested by the Applicant. What evidence do you have to support this claim?	<p>The parties acknowledge that there are no official statistics which give accurate data on the number of properties in the PRS or on the numbers of lettings and the origins of tenants. Estimates must therefore be made using the limited available data sources.</p> <p><u>The Horizon submission</u></p> <p>Horizon argue that:</p> <ul style="list-style-type: none"> • at any one time 11% of the PRS is vacant (from the English Housing Survey 2014/15) • the % of households in the PRS who did not live at the same address one year earlier is the measure of 'churn' within the sector. Horizon use the 'worst case' scenario of Gwynedd at 42% to illustrate the calculation (the comparable figure is 35% in Anglesey). • That a 'churn' rate of 42% implies that 3.5% of properties are re-let each month (42% / 12 months) • and that this implies that the difference between this re-let rate of 3.5% and the vacancy rate of 11%, equivalent to 7.6% of the PRS stock, suggests a 'headroom' capacity of 1,649 bedspaces (21,700 bedspaces across the KSA times 7.6%). <p><u>The IACC, GCC and WG submission:</u></p> <p>The Horizon approach is incorrect, for the following reasons:</p> <ul style="list-style-type: none"> • The English Housing Survey gives estimates of the actual number of movements within the PRS stock, which show that in England a total turnover rate of 33.44% is composed of the following elements: <ul style="list-style-type: none"> • 19.11% of all moves were within the PRS itself, with tenants moving from

Reference	Respondent:	Location:	Question:	IACC RESPONSE																																																																																															
				<p>one address to another (these moves are self balancing, and create no net vacancies)</p> <ul style="list-style-type: none">• 4.87% of moves were into the PRS by new households forming (and therefore taking up net vacancies)• 3.4% of moves were into the PRS by existing households moving from owner occupation or social housing (and therefore taking up net vacancies)• 6.06% of moves were by former PRS tenants leaving the sector for owner occupation or social housing (and therefore creating vacancies)• The difference between the number of tenants leaving the sector (6.6%) and the number of new lettings (4.87%+3.4% = 8.27%) represents stock becoming vacant by the dissolution of households on death or relationship breakdown, and the net increase in the PRS stock by landlord purchases. <p>These numbers can be applied to Anglesey, and compared to the migration numbers from the Census (also used by Horizon), in the table below:</p> <table><tr><th colspan="9">Estimating turnover in the Private Rented Sector</th></tr><tr><th></th><th colspan="2">EHS 2017/18 estimates of moves into/out of PRS</th><th colspan="2">Pro rata to Anglesey PRS stock in 2017/18</th><th colspan="2">Pro rata to Anglesey Census 2011</th><th colspan="2">Migration flows in Census 2011</th></tr><tr><th></th><th>Numbers of households</th><th>Moves as % of total households</th><th>Pro rata in Anglesey</th><th>Inflow and outflow to PRS</th><th>Pro rata to Census PRS total</th><th>Inflow and outflow to PRS</th><th>Migration flows in Census</th><th>Origin and destination of movers</th></tr><tr><td>Total number of households in PRS</td><td>4,500,000</td><td></td><td>4,680</td><td></td><td>4,324</td><td></td><td></td><td></td></tr><tr><td>Moves within PRS</td><td>860,000</td><td>19.11%</td><td>894</td><td></td><td>826</td><td></td><td>664</td><td>Moved within Anglesey</td></tr><tr><td>New households in PRS</td><td>219,000</td><td>4.87%</td><td>228</td><td></td><td>210</td><td></td><td></td><td></td></tr><tr><td>Move from OO</td><td>98,000</td><td>2.18%</td><td>102</td><td rowspan="2">387</td><td>94</td><td rowspan="2">357</td><td>392</td><td>Inflow from outside Anglesey</td></tr><tr><td>Moves from SH</td><td>55,000</td><td>1.22%</td><td>57</td><td>53</td><td></td><td></td></tr><tr><td>Moves out to OO</td><td>208,000</td><td>4.62%</td><td>216</td><td rowspan="2">284</td><td>200</td><td rowspan="2">262</td><td>354</td><td>Outflow from Anglesey</td></tr><tr><td>Moves out to SH</td><td>65,000</td><td>1.44%</td><td>68</td><td>62</td><td></td><td></td></tr><tr><td>Total movers</td><td>1,505,000</td><td>33.44%</td><td>1,565</td><td>671</td><td>1,446</td><td>620</td><td>1410</td><td></td></tr></table> <p>The numbers of movers into and out of the PRS are not of course the same as the migration flows within the island and outside, but the overall numbers suggest that the order of magnitude is broadly comparable.</p> <p>The use by Horizon of a vacancy rate of 11% across the PRS appears to misunderstand the EHS estimate. The EHS (2014/15) explains that vacancies include properties that are in between lets, rather than standing empty for lack of a tenant:</p> <p><i>Vacant homes were more common in the private rented sector, at around 10%, although the rate was slightly higher in 2008 (13%). The higher prevalence of vacant homes in the private rented sector may partly be related the higher turnover of properties in the private rented sector. This is because properties in between lets are classified as vacant on the EHS.</i></p>	Estimating turnover in the Private Rented Sector										EHS 2017/18 estimates of moves into/out of PRS		Pro rata to Anglesey PRS stock in 2017/18		Pro rata to Anglesey Census 2011		Migration flows in Census 2011			Numbers of households	Moves as % of total households	Pro rata in Anglesey	Inflow and outflow to PRS	Pro rata to Census PRS total	Inflow and outflow to PRS	Migration flows in Census	Origin and destination of movers	Total number of households in PRS	4,500,000		4,680		4,324				Moves within PRS	860,000	19.11%	894		826		664	Moved within Anglesey	New households in PRS	219,000	4.87%	228		210				Move from OO	98,000	2.18%	102	387	94	357	392	Inflow from outside Anglesey	Moves from SH	55,000	1.22%	57	53			Moves out to OO	208,000	4.62%	216	284	200	262	354	Outflow from Anglesey	Moves out to SH	65,000	1.44%	68	62			Total movers	1,505,000	33.44%	1,565	671	1,446	620	1410	
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Reference	Respondent:	Location:	IACC RESPONSE	
				<p>(Source: <i>English Housing Survey Housing Stock Report</i>, 2014 para 1.23 p12)</p> <p><u>Conclusion</u></p> <p>The Horizon methodology is incorrect. Net lettings (to new households and existing households moving from other tenures) are around 8% of the total PRS stock each year.</p> <p>The Horizon gravity model estimates that demand for 900 bedspaces in the PRS would probably be met with 674 in Anglesey and 226 in Menai Mainland.</p> <p>There are some 375 net lettings each year in the PRS on Anglesey: all of these are currently being let either to local people or to people wishing to move to Anglesey. Demand from the Wylfa Newydd workforce would be in addition to existing demand (which is clearing the market at current rates of supply). The predicted take up of PRS lettings by the Wylfa Newydd workforce occurs over the four years from Y3Q3 to Y7Q3, which would require around 70 properties per annum, or nearly one in five of all PRS lettings over those years.</p> <p>The IACC are working closely with Horizon in s.106 discussions to ensure that the Capital Enhancement Contribution is a sufficient to increase housing supply to mitigate against impacts on the private accommodation market.</p>
Q2.10.14	Applicant, IACC, GCC, NWP and WG	Q	At the ISH on 7 January 2019 it was suggested that a portal monitoring where workers lived would be needed. Can you provide further detail of how this would operate, how often it would need to be updated, how it could be secured and what it would enable?	<p>Horizon are proposing a 'Workforce Accommodation Portal' as part of the WAMS. This is, in effect, a matching service where accommodation providers can upload their property to be let to Wylfa Newydd Construction workers.</p> <p>The IACC are fully supportive of the Portal, however this must be a 'live' portal capable of being 'switched on and off' if there is an over concentration of workers in one particular location or over saturation in any particular accommodation sector.</p> <p>Furthermore, the IACC require that properties eligible to be advertised on the portal must meet eligibility criteria to prevent unsuitable properties being advertised for rent. This includes being registered on Rent Smart Wales, having the necessary fire certificates etc. In terms of tourism accommodation, this may include, for example, being registered by Visit Wales, having the necessary licenses from IACC etc. This detail and eligibility criteria needs to be developed with Horizon and other relevant bodies.</p> <p>The effective management of the Portal is critical to mitigating the impacts on the accommodation sector.</p>
Q2.10.15	Applicant, IACC and GCC	Q	Applicant can you: 1) Provide further detail as to how the £10 million for the proposed Housing Fund was calculated. 2) Indicate when and for how long the fund would be available. 3) How would the Housing Fund enable the delivery	<p>1. The IACC are currently in s.106 negotiations with Horizon. The £10M figure has been increased to £16M. The IACC believe this is sufficient provided that other measures (e.g. the WAMS and the Portal) are delivered effectively by the applicant and the Site Campus is delivered in accordance with the Phasing Strategy (note the IACC currently disagree with this phasing as outlined in Q2.10.12 above).</p> <p>2. As outlined in the s.106 Agreement, the fund should be available from</p>

Reference	Respondent:	Location:	IACC RESPONSE	
			<p>of more empty homes than the current schemes run by the IACC and GCC?</p> <p>4) How could the Housing Fund be pro-active rather than re-active in enabling the delivery of housing?</p> <p>IACC and GCC can you:</p> <ol style="list-style-type: none"> 1) Advise whether the £10 million proposed would be sufficient and if not why not. 2) Indicate when you consider the fund should be available from and how long it should run for. 3) Indicate how you think the fund could provide the 'capacity enhancement boost' suggested by the Applicant. 	<p>implementation through to the completion of the construction phase.</p> <p>3. The fund could provide the 'capacity enhancement boost' through funding an empty homes programme, capital contribution towards bringing forward new build units, latent accommodation fund to incentivise people to let rooms and through other schemes such as assisting people downsize, rent deposit contributions and so on. The IACC provide further detail on this in section 6.0 and 7.0 of the LIR [REP2-068].</p>
Q2.10.16	IACC	Q	<p>Please outline the planning status of the Rhosgoch site. In particular can you advise whether the site was considered for TWA as part of the JLDP/SPG? Whether the site could be used for residential purposes? What constraints exist at the site eg are there issues with contamination/remediation?</p>	<p>In the JLDP, Rhosgoch is allocated as a 'reserve employment site'. The reserve employment sites are not for local market demand for general industrial or business uses, but rather to accommodate business and employment uses that would initially cater specifically for the needs of Wylfa Newydd or other 'Energy Island'/ 'Enterprise Island' development.</p> <p>Proposals for B1, B2 or B8 uses on these sites would need to demonstrate that there was no suitable safeguarded or allocated employment site available or the supply is insufficient to meet the need.</p> <p>The Rhosgoch site was not considered for TWA as part of the JLDP / SPG. TWA for Wylfa Newydd should be developed in accordance with the spatial hierarchy as outlined in Strategic Policy PS10.</p> <p>However, given the scale of the Wylfa Newydd project and the potential impacts on Anglesey's residents and communities (i.e. Welsh Language & culture, tourism, highways, environmental impacts etc.) the IACC does recognise the potential merits of having a self-contained TWA campus at Rhosgoch.</p> <p>Given the proximity of Rhosgoch to Wylfa (approximately 5.5 miles / 9 minutes via the A5025) and the IACC's preference for use of previously developed land, the Rhosgoch site could potentially be suitable for TWA or a temporary caravan site (subject to appropriate assessment and mitigation). The IACC does not agree with Horizon's statement [REP4-002] that like Land and Lakes, Rhosgoch is too far from the Wylfa Newydd site. The IACC does agree that it would require highway improvements (new roundabout on A5025 and improvements from A5025 to the site entrance – approximately 1.5 miles).</p> <p>The Rhosgoch site was included as an option for TWA in Horizon's Informal 'Project Update' Consultation in January 2016 (4,000 bedspaces) and thereafter in the formal PAC 2 consultation (up to 1,500 bedspaces). The IACC therefore assume that Horizon will have more recent survey data in terms of ecology, landscape, contamination etc. to inform the ExA request. Given that the site extends to some 200 acres, it is only parts of the site (i.e. where the oil tanks were located) that may have contamination</p>

Reference	Respondent:	Location:	Question:	IACC RESPONSE
				issues.
Q2.10.17	Applicant	Q	A number of IPs [eg REP2-295] have suggested that the Workers Accommodation Management Strategy (WAMS) needs to be secured in the DCO – how and where could this be achieved?	
Q2.10.18	Applicant, IACC, GCC and WG		1) What could be the effect on accommodation availability on Ynys Môn be if the provision of the TWA was delayed? 2) If the effect was thought to be negative would there be alternative arrangements or would there be a need for a Requirement to manage this situation? 3) If a Requirement was considered necessary please provide suggested wording.	<p>1. Horizon Workforce Accommodation Strategy relies upon housing over 2,400 non home based Wylfa Newydd workers over a two year period (Y3Q1 to Y4Q4) before the TWA comes on stream. The housing and tourism markets are expected to bear the brunt of this pressure, with numbers in the private sector rising to 2,855 by Y5Q3. If there is a delay in the delivery of the TWA (as experienced in Hinkley Point C), this impact could be significant. Even a delay on 1 quarter would see an additional 500 workers seeking accommodation in the private market. The IACC have already indicated [REP2-068] that 520 additional units are required to meet the additional demand by Y4 Q4. There is no capacity to absorb any more workers into the private market without having significant adverse impacts (e.g. displacement, increased risk of homelessness, rent increases, impacts on tourism etc.).</p> <p>2. If Horizon can evidence that the TWA cannot be delivered earlier than Y4 Q4, the IACC would require that more bedspaces to be delivered and that the following alternative proposal is agreed and secured through the Phasing Strategy:</p> <ul style="list-style-type: none"> - 2,500 bedspaces delivered by Y4 Q4 - 3,000 bedspaces delivered by Y6 Q3 - 4,000 bedspaces delivered by Y7 Q2 <p>As detailed in the LIR ([REP2-068], the IACC's concern if the level of absorption of non-home based construction workers in existing accommodation leading up to Y4 Q4. Horizon's TWA proposal is essentially the wrong way around as the 2,500 bedspaces are delivered in the final phase. Delivering 2,500 TWA bedspaces by Y4 Q4 would still result in 900 workers being in existing accommodation but crucially, would allow the IACC more time to deliver the additional units required in the private sector leading up to peak. This would result in less pressure on the housing and tourism markets; it would allow a more gradual build-up of units (and absorption by workers) and would also result in less units being required.</p> <p>3. Provided that the number of workers in existing accommodation is capped at 3,000 and Horizon agree to deliver more TWA bedspaces earlier (secured through the Phasing Strategy), an additional requirement is not necessary.</p>
	Employment			
Q2.10.19	Applicant, IACC, GCC and WG	Q	Would a Supply Chain Action plan be required? If so what could it deliver, when would it be needed and how should it be secured?	Yes a Supply Chain Action Plan is required and will need to be complied with throughout the construction period and during the early years of the operational period.

Reference	Respondent:	Location:	Question:	IACC RESPONSE
				<p>The purpose of the Supply Chain Action Plan is to deliver realistic opportunities for local companies to compete for meaningful contracts on the Wylfa Newydd Project.</p> <p>The Supply Chain Action Plan will need to:</p> <ol style="list-style-type: none"> 1. Include methodology on how sustainable environmental practices are part of the scoring criteria to promote opportunities for local companies (positive discrimination within the legal boundaries) 2. Identify Wylfa Newydd Project activities requiring supply chain contracts 3. Provide support opportunities for local companies to compete for contracts (advice on completing documentation / provision of training to gain the necessary standards to be eligible for contracting e.g. ISO accreditation) 4. Include support measures which promote local business to come together and bid with larger contractors to bid for contracts (to support Consortia). 5. Have an agreed set of KPI and reporting protocols and report upon on a quarterly basis to measure performance. 6. The experiences of the Welsh Government needs to be brought to bear in respect of the value of contracts. If they are set too high local businesses will be unable to compete. Agreement on economies of scale so as not to preclude SMEs from competing. <p>The Supply Chain Action Plan must be in place prior to the implementation of the DCO and to be secured through Schedule 4 of the s.106. The IACC requires that this is agreed with or approved by the Council prior to implementation. Discussions are ongoing between HNP and IACC on the s.106 in terms of detail, wording and quantum.</p> <p>At present, despite the scale of project, investment and potential opportunities, how Horizon will maximise the positive local impacts have not been sufficiently defined, and as such cannot be integrated into the final DCO provisions to provide the necessary certainty and confidence.</p>
Q2.10.20	IACC	Q	<ol style="list-style-type: none"> 1) How many people are currently employed in tourism on Ynys Môn? 2) How many are employed on a seasonal basis? 3) Where do seasonal workers come from? 4) What proportion speak Welsh? 	<p>The IACC provided a detailed response to this request as part of the action points to ISH on the 7th January [REP4-034 Annex 1.6]. However, in summary:</p> <ol style="list-style-type: none"> 1. According to 2017 STEAM data, 4,102 FTE people are employed in tourism on Ynys Mon (3,269 direct and 833 in direct). 2. During the August peak, 7,035 people are employed in tourism on Ynys Mon. In December, this falls to 1,793 FTE. This shows the number of seasonal workers fluctuates throughout the year. However assuming that the December low are all full-time, the number of seasonal workers can be up to 5,000 workers. 3. Data from the Census shows that over 95 percent of workplace employment in Anglesey was filled by those who reside within Anglesey and neighbouring Gwynedd. The majority (89 percent) of residents working outside of Anglesey do so in Gwynedd. Similarly, 92 percent of Gwynedd's workforce reside in either Anglesey or Gwynedd. Therefore, in answer to the question, 95% of the seasonal workers come from Anglesey and Gwynedd (e.g. students, school children etc.). 4. Given that residents of Anglesey and Gwynedd fill 95% of these jobs, it is

Reference	Respondent:	Location:	IACC RESPONSE	
				reasonable to assume that the number who speak Welsh is equivalent to the Welsh speaking population of Anglesey (57.2%) and Gwynedd (65.4%) – i.e. around 60%.
Q2.10.21	Applicant, IACC, GCC and WG	Q	1) Provide a copy of the terms of reference for the Job Skills and Implementation Plan (JSIP). 2) Explain how the plan would be secured and delivered. 3) Explain who, given the integrated nature of the job market in the area and the extent of the DCCZ, would be involved with the delivery of the JSIP?	1) HNP drafted the terms of reference for the Jobs and Skills Implementation Plan and circulated to the IACC on 10 th December for comment by 14 th December. The IACC have not agreed to the draft terms of reference. The IACC has set out its position on the draft JSIP in its note on the ISH on socio economics [REP4-034]. 2) The JSIP would be secured and delivered by Schedule 4 of the s.106 prior to the implementation of the DCO. Discussions on the s.106 are still ongoing between HNP and IACC. 3) The JSIP itself would be agreed between HNP and IACC through the Jobs and Skills Engagement Group in consultation with key stakeholders such as or equivalent to: Department of Works and Pensions, North Wales Economic Ambition Board, and Grwp Llandrillo Menai.
Q2.10.22	Applicant, IACC, GCC and WG	Q	Applicant can you: 1) Provide further detail as to how the £10 million for the proposed Employment/Skills fund was calculated. 2) Indicate when and for how long the fund could be available and what could it be used for. IACC, GCC and WG can you: 1) Advise whether the £10 million proposed would be sufficient and if not why not. 2) Indicate when you consider the fund should be available from, how long it should run for and what it would be used for.	1) Discussions are still ongoing between the IACC and HNP over the quantum and the percentage split of how the Employment, Skills and Economic Inactivity fund is distributed as part of the s.106 negotiations. 2) The fund should be available prior to implementation and should run for the entire construction phase and into the operational phase. The fund should be used for: a) Investment to upskill local people through provision by specialist training providers. b) Upskilling people out of inactivity and underemployment (including NEETS) into work c) Upskilling those who are underemployed into higher quality jobs; d) Upskilling / re-skilling those already in employment into higher quality jobs; e) Monitoring the capacity and hard to fill vacancies in the labour market; f) Campaigns and Programmes to attract back former residents g) Providing bespoke support to SMEs in addition to that currently available which includes accreditation so that the local supply chain can compete for contracts
Q2.10.23	WG and IACC	Q	WG - At the ISH on 8 January 2019 you indicated that you would prefer the use of Key Performance Indicators (KPIs) rather than targets for jobs and employment can you: 1) Explain why you consider KPIs would be better than targets. 2) Indicate what KPIs you consider would be appropriate and how they would need to be secured. 3) Outline what would happen in the event of a KPI not being met? IACC can you:	1) The IACC has no preference on the wording of a 'target' or 'KPI' as in essence both WG and the IACC are striving to achieve the same output and outcomes which is to maximise the number of local employment through the lifecycle of the project (construction, operational, decommissioning) directly and indirectly. There should be a minimum target / KPI to be achieved and once the minimum is achieved, the target / KPI should be re-calibrated with an agreed revised target / KPI to keep on maximising the number of jobs secured locally and not to rest on laurels on achieving the minimum target. 2) Targets / KPIs would need to be secured through the s.106. Appropriate targets in the IACC's view would be as follows: 1. Minimum 2,000 new local jobs on Anglesey and the mainland during the construction phase (with investment in a number of education, skills and training programmes a target / KPI of 2,000-2,250 to be achieved in the Anglesey and Môn Menai area is not unrealistic). 2. Annual target / KPI for local jobs during construction period for each year of the

Reference	Respondent:	Location:	IACC RESPONSE	
			1) Explain why you prefer the use of targets. 2) Indicate what targets you consider would be appropriate and how would they need to be secured. 3) Outline what would happen in the event of a target not being met?	construction phase (see Q2.10.24) 3. Target / KPI of achieving 85% local employment during the operational phase in highly productive roles with salaries above national average; 4. A Target / KPI (to be agreed) for local people to undertake a proportion of the 1,000 outage roles; 5. Minimum 2.3% of the on-site construction workforce for the Wylfa Newydd Project are employed as apprentices on formal apprenticeship frameworks or standards 6. Minimum of 20% of the site-based operational workforce being graduates from the Wylfa Newydd Project Technical Apprentice Scheme. 3) In the event of a target not being met, the s.106 must provide for the release of funding to fund measures to promote the target being met.
Q2.10.24	Applicant and IACC	Q	Should the early phases of construction have higher targets for the use of local labour and if so how could this be secured?	<p>Yes. The early phases should be almost exclusively local residents (or least as many as practical – appreciate some elements might need prior nuclear construction experience). The reason for this, is that demand is low in the early stages, and there is sufficient capacity locally to supply those levels of labour demand. The labour demand should only turn to non-local labour when the local supply has been exhausted or has reached its limit. HNP only have 100% of home-based (within 90 minutes of site) in Y1 and Y2 which is 123 and 333 respectively. From Y3, as labour demand increases, the percentage of home based workers dramatically falls to its lowest point at peak which Y7. (Y3 = 75.4%, y4 = 47.2%, Y5 = 34%, Y6 = 30.3%, Y7 = 23.1%).</p> <p>The second aspect relates to the training and the same points the Council made in the LIR (Chapter 3, 4 and 7). In order to maximise the number of local people taking up roles training requires to start early so there are sufficient numbers of skilled local people ready. The sooner that investment is made in education, skills and training to increase the pipeline of local people with suitable qualifications, the later it would be possible to push the dependence on the in-migrant workers for the Project (this would also have a positive effect on the Housing and Welsh Language aspects of the Project).</p> <p>There should be an annual target for home-based construction workers throughout the construction period and not only for peak year. This would ensure that there is commitment to the local workforce throughout the lifecycle of the construction period. The mechanism of securing this should be through the s.106.</p>
Q2.10.25	Applicant, IACC, GCC and WG	Q	Do 'local', 'visitor' and 'worker' need to be defined? If they do what and where should these definitions be located?	<p>Yes.</p> <p>Horizon define a "worker" as:</p> <p><i>A "permanent worker" is a "worker" with a badge allowing access to work at Wylfa Newydd Site who has either worked five full days in a 30-day period or who has worked at the Site for more than a total of 40 hours in any 30-day period.</i></p> <p>Horizon define a "visitor" as:</p> <p><i>A DCO Site Visitor is someone who is not badged to access the site and is visiting or temporarily working on the Wylfa Newydd Main Site.</i></p>

Reference	Respondent:	Location:	IACC RESPONSE	
				<p>Although the IACC had initial concerns regarding the definition of “visitor” and in particular the impact this would have on tourism accommodation, the IACC accept both of these definitions. However, Horizon define “local” as someone living within 90 minutes to site (i.e. a home based worker). The IACC does not agree with this broad definition of “local” and believe that “local” should cover the KSA only. Other home based workers currently living in North Wales could be defined as “regional”.</p> <p>The IACC have particular concern with regards to how long a person would have to reside on Anglesey or North Gwynedd to be defined as “local”. This is important when setting local employment targets and particularly when transitioning from construction phase to operational phase. The IACC believe that a worker would need to be either from the KSA or have lived in the KSA continuously for a minimum of 5 years to be considered “local”.</p>
Q2.10.26	GCC	Q	In REP2-294 you raised a concern regarding third sector providers can you indicate who they are, what they would need and how this could be funded.	
Q2.10.27	Applicant	Q	Can you indicate what specialist support you would provide for organisations to back fill positions in key worker roles such as health and social care, language specialists or the emergency services that could be created by the displacement of staff to work on the project?	
Q2.10.28	Applicant	Q	Can you outline how you would work with/support NWFR to ensure that the fire service provision for Ynys Môn currently delivered through the retained fire crews could be maintained throughout the construction and operational phases of the scheme.	
Q2.10.29	Applicant	Q	What support and/or training could be provided for adults and those already in work to enable them to reskill to access job opportunities particularly during the operational phase?	
	Health			
Q2.10.30	Applicant	ADA/Q	Confirm how, when and where health care provision would be provided at the site should the DCO be consented.	
Q2.10.31	Applicant, BCUHB and PHW	ADA/Q	Is there an early year’s strategy in place to ensure that current levels of local health service provision (including ambulance services) could be maintained in the absence of provision on site.	

Reference	Respondent:	Location:	IACC RESPONSE	
Q2.10.32	Applicant and BCUHB	ADA/Q	1) Detail what health services would be provided on site and what would be out-sourced to local providers. 2) What hours would the service operate, how would workers on night shifts access services and what provision would there be for out of hours emergencies? 3) What number of health staff would be employed on site and would this be reflective of the NHS staff: patient ratios? 4) Would health services be available in Welsh? 5) How would the transfer between on-site and NHS services work?	6)
Q2.10.33	Applicant	Q	At the ISH on 7 January 2019 you indicated that prescriptions would be filled for free through the on-site pharmacy. How and where would this be secured?	
Q2.10.34	Applicant	Q	An on-site paramedic, ambulance and firefighting team are proposed at WNDA. Who would be responsible for responding to incidents off site (eg at the Park and Ride or the logistics centre)?	
Tourism				
Q2.10.35	IACC and WG	Q	Provide details for the number of people who annually use the Welsh Coastal Path (WCP) and what the WCP contributes to the economy of both Ynys Môn and North Wales.	<p>Isle of Anglesey Coastal Path opened officially in 2006 and later incorporated into the Wales Coastal Path (WCP) as this was developed, being officially opened in 2012. The WCP is a key part of Anglesey's tourism offering and an economic asset in which IACC, Welsh Government (WG) and the European Union (EU) have invested multi-millions to develop as a tourism and recreational resource.</p> <p>The Wales Coastal Path has been identified as a major contributor to the Welsh and Anglesey economy, contributing £14m on the Island and is a major attraction for visitors to the Island.</p> <p>Anglesey is seen by other Welsh authorities as an exemplar in leveraging economic wealth and cultural capital from this asset. Most of the economic impacts attributed to the Path occur away from the coast itself as it is an enabler of expenditure within local economies, not just in obviously tourist-related activities, but also in sectors such as transport, communications and financial and business services.</p> <p>NRW Carried out an 'Economic assessment of the health benefits of walking on the Wales Coast Path' from which some conclusions can be drawn (https://walescoastpathcdn-01.azureedge.net/media/1321/economic-assessment-of-the-health-benefits-of-walking-on-the-wales-coast-path.pdf?rnd=131771618230000000)</p> <ul style="list-style-type: none"> Diverting the Wales Coast Path could have health and economic implications.

Reference	Respondent:	Location:	Question:	IACC RESPONSE																																		
				<ul style="list-style-type: none">A Health Economic Assessment Tool (HEAT) was developed to attach value to health benefits derived from walking. The tool estimates that £3.5 million a year can be attributed to the existence of the Wales Coast Path in terms of health benefits alone.Anglesey, at around 135 miles, accounts for approximately 15.5% of the 870 mile Wales Coast Path. <p>There are distinct differences between user segments of the WCP. Users of the Anglesey section tend to be older (average age 55), staying visitors with significantly higher socioeconomic profiles than the average (virtually 80% are ABC1). Reflecting this profile, Anglesey’s WCP visitors spend more per night (£85.37) than the Wales (£74.11) or North Wales Coast (£52.63) average. Additionally, Anglesey Path users also recorded a high mean additional trip spend of £18.81.</p> <p>Whereas most visitors to the WCP live in Wales (59%) and are on a day trip (61%), Anglesey Path users are much more likely to be staying visitors from England (56%), reflecting its position as a major tourist attraction for the Island. Crucially, Anglesey users exhibit high levels of path loyalty and correspondingly lower levels of preparedness to substitute for other routes – only 65% would be prepared to walk elsewhere compared to 93% in Carmarthen.</p> <p>The IACC has user counts located at 8 different locations on the Wales Coastal Path around Anglesey; currently verified data is available through to 2017, providing information on the annual number of visitors.</p> <p>The closest survey location within the study area is Llanbadrig. This counter is approximately 3km from Park Lodge near Cemaes, which is generally coincident with the eastern end of the Wylfa site boundary.</p> <p>Approximately 12-15,000 users counted at the Llanbadrig location annually.</p> <p>Number of users has fluctuated over this period, but generally showing an increase year on year.</p> <p>Approximately 145,000 annual users recorded across all counters over recent years on Anglesey.</p> <p>Using data from counters on the path, and user surveys, IACC estimates that 23,688 people walked on the path every week. On average they walked 4.38 miles per week (spread over a mean of 1.6 visits per week).</p> <table><tr><th rowspan="2">Grid reference & Location</th><th colspan="6">Yearly Totals</th></tr><tr><th>2012</th><th>2013</th><th>2014</th><th>2015</th><th>2016</th><th>2017</th></tr><tr><td>1. Llanbadrig SH377947</td><td>9894</td><td>12492</td><td>11787</td><td>13441</td><td>15266</td><td>14175</td></tr><tr><td>2. Penmon SH634811</td><td>8539</td><td>9578</td><td>9792</td><td>11238</td><td>10890</td><td>11272</td></tr><tr><td>3. Aberffraw SH338680</td><td>12384</td><td>5781</td><td>10009</td><td>14270</td><td>14001</td><td>13846</td></tr></table>	Grid reference & Location	Yearly Totals						2012	2013	2014	2015	2016	2017	1. Llanbadrig SH377947	9894	12492	11787	13441	15266	14175	2. Penmon SH634811	8539	9578	9792	11238	10890	11272	3. Aberffraw SH338680	12384	5781	10009	14270	14001	13846
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Q2.10.36	IACC	Q	Provide a map of Ynys Môn showing of the percentage of Welsh speakers by ward.	<p>A map of Ynys Môn showing the percentage of Welsh Speakers by ward (age 3 upwards) and highlighting the 70% and 50% thresholds has been submitted into the process as Local Impact Report Map 1 Welsh Language Assessment (REP2-167).</p> <p>The same map of Ynys Môn showing the percentage of Welsh speakers by ward can also be found within Local Impact Report – Annex 9A – Anglesey Language Profiling Data Report (REP2-137).</p>																																										

Reference	Respondent:	Location:	IACC RESPONSE	
Q2.10.37	IACC and WG	Q	<p>You have suggested the need for targets for the number of Welsh speakers that would be employed both during construction and operation.</p> <ol style="list-style-type: none"> 1) How would this be secured? 2) Should the target apply to homebased workers? 3) If it is would be secured through a Requirement how would Welsh speaker be defined? 4) What should happen if the target was not met? <p>Operationally you have suggested a target of 100% Welsh speakers with a minimum requirement of 85%.</p> <ol style="list-style-type: none"> 1) Is this realistic? 2) Can you provide an example of another business or organisation that is required to achieve a similar proportion of Welsh speaking staff and has it been achieved? 3) What should happen if the target was not met? 	<p>1) All targets for the employment of individuals with Welsh language skills would be managed through the developer's Welsh language skills strategy. A Welsh language skills strategy sits within an organisation's corporate Welsh language policy and provides the mechanism for an employer to:</p> <ol style="list-style-type: none"> i. Decide the levels of Welsh language competence required in the four aspects of language skills (understanding, speaking, reading and writing) in specific departments, teams and positions to enable the organisation to carry out its functions effectively and efficiently and to promote the use of Welsh in the workplace in accordance with its Welsh language policy. ii. Identify the current language skills of the workforce (language skills audit/ testing during recruitment) iii. Identifying and closing Welsh language skills gaps by: <ol style="list-style-type: none"> a) appointing qualified individuals to vacant posts b) reorganising posts to redeploy qualified individuals to specific teams; and c) training current employees, enhancing their language skills and competences. (LIR, Chapter 9, paras 6.9.2.4 – 6.9.2.11 REP2-069). <p>Welsh Language Skills Strategies are a commonly used mechanism for planning the Welsh language skills of a workplace. All targets and aims for the number of individuals with Welsh language skills ranging from level 1 to level 5 would be set/secured in relation to i) above.</p> <p>Any Welsh language learning requirements are included in an individual's contract of employment. The Welsh language skills of all staff are reviewed as part of Annual Staff Appraisals. The Welsh language skills / capacity of staff would be a permanent item on management team and HR management meetings.</p> <p>HNP's proposed Welsh language skills competency framework and Welsh language skills assessment tool (WCLMES Measure 8) represents ii) above. The Welsh Language Commissioner is the regulatory body that oversees an organisation's statutory or voluntary implementation of its Welsh Language Policy and Welsh Language Strategy. 'Horizon's relationship with the Welsh Language Commissioner should be formalised on a voluntary basis, as per the best practice arrangements established by other organisations not formally included within the ambit of the Welsh Language Measure 2011'. (LIR, Chapter 9, para 6.9.2.11 REP2-069)</p> <p>It is the robust application of all 3 steps of a Welsh Language Skills Strategy that would mitigate any failure to recruit adequate numbers of Welsh speakers. (LIR, Chapter 9, paras 6.9.2.8 REP2-069)</p> <p>2) Targets / aims for specific proportions of staff with Welsh language skills (at levels 1 – 5) would be allocated to specific departments, work teams and positions within the workforce. These targets apply to any holder of a post and therefore apply to homebased and non-homebased workers.</p> <p>3) Definition of a Welsh speaker The Isle of Anglesey County Council, Gwynedd Council and Welsh Government are agreed that the definition of a Welsh speaker is an individual with spoken skills in</p>

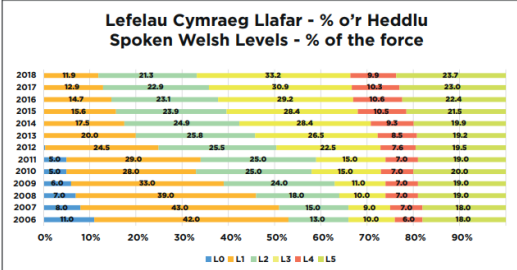
Reference	Respondent:	Location:	Question:	IACC RESPONSE
				<p>Welsh at Level 3 or higher as defined by the Association of Language Testers in Europe¹ (ALTE) Framework (see below) and 'Canolradd' (Intermediate) level as defined by the National Centre for Learning Welsh. Although Level 3 individuals may not understand the entire discussion in Welsh (especially if the matters are technical in nature), they are able to understand and contribute to the conversation without changing the language of the discussion from Welsh to English, both in work and community contexts.</p> <p>(iii) Speaking Levels (based upon ALTE framework and adopted by IACC and Gwynedd Council workplace Welsh Language Skills Strategies)</p> <p>0 - No skills 1 - Able to conduct a general conversation [greetings, names, saying, place names] 2 - Able to answer simple enquiries involving work 3 - Able to converse with someone else, with some hesitancy, regarding routine work issues 4 - Able to speak the language in the majority of situations using some English words 5 - Fluent – able to conduct a conversation and answer questions, for an extended period of time where necessary</p> <p>4) An annual review of its Welsh language strategy and annual audit of all staff's Welsh language skills (secured through Welsh language skills being reviewed in annual staff appraisals) would identify whether targets had been met or not and steps to provide additional training, mentoring, changing language level requirements on recruitment etc. would be implemented to achieve targets in the coming year.</p> <p>Construction, Operation and Decommissioning Phases</p> <p>The figure of 85% refers to IACC's position that 85% of the operation workers should be <u>recruited from within the local area (KSA)</u> (LIR Chapter 3, para 1.1.4) (REP2-063).</p> <p>IACC has indicated its expectation that a target of 100% Welsh level 1 Welsh language skills should be achieved for all construction and operation staff.</p> <p>LIR Chapter 9 para 6.9.2.4 (REP2-069) states:</p> <p>"IACC believes that this Mitigation would be more effective if it included a statement to the effect that Welsh language skills (of different levels) be required across all grades, including Senior and Middle Management during construction, operation and decommissioning phases. It is recognised best practice that all employees in an organisation gain basic courtesy Level 1 Welsh.² It would also be a realistic expectation that all Horizon staff follow the National Learn Welsh Centre's 10 hour on-line course Croeso Cymraeg Gwaith."³</p>

¹ <https://www.alte.org/>

² This is a requirement for all North Wales Police staff for example.

³ Internal Use of Welsh in the Workplace Final Report November 2010 (REP2-140)

Reference	Respondent:	Location:	Question:	IACC RESPONSE
				<p>LIR Chapter 9 (REP2-069) paras 6.9.12.1 and 6.9.12.2 quote HNP's WCLMES measure 12 commitment to linguistic courtesy for all operational and construction staff:</p> <p><i>"Horizon will provide language and culture awareness training to all construction and operational staff and require staff to demonstrate linguistic courtesy" HNP WCLMES Measure 12 (Application Reference Number 8:14)</i></p> <p>Clarification should be sought to ensure that HNP's commitment to training and requiring staff to demonstrate linguistic courtesy equates to Level 1 = linguistic courtesy (see IACC language levels defined in 3) above and N Wales Police Welsh language protocols in the references provided below).</p> <p>Other proportions of Welsh speaking staff (at levels 3, 4 and 5) would be assigned to specific roles / posts within the developer's workforce structure (e.g. all public facing roles, HR staff, procurement, marketing /publicity, senior and middle management roles). Welsh Government has offered to assist the developer in this task. Appropriate advice could also be sought from the Welsh Language Commissioner.</p> <hr/> <p>1) Yes this aim is realistic. In Wales, there is a well-established approach (since 1993) to developing the bilingual capacity of workforces and the bilingual practices of the workplace. The Welsh Language Commissioner would have the best overview of effective practice throughout Wales.</p> <p>2) In North Wales, the North Wales Police (NWP) is one example and provides a best practice example of how that can be achieved over a period of time.</p> <p>NWP's approach in brief:</p> <ul style="list-style-type: none"> • 2005 Level 1 Welsh language skills required for all new members of staff; Level 1 achieved through 1 day training for all new staff and self-study materials also provided. • 2008 Level 2 Welsh Language skills required for all new staff and Level 1 for all existing staff. • Currently, all new non-Welsh speaking staff are required to gain Level 3 Welsh language skills within 12 months of appointment. <p>A more detailed account of NWP's development of bilingual skills is provided here: https://www.north-wales.police.uk/media/653935/north-wales-police-and-bilingualism-eng.pdf</p> <p>The figure below shows how North Wales Police's staff Welsh language profile has changed between 2006 – 2018.</p>

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				 <p>Source: Annual Monitoring Report on the Welsh language 2018 https://www.north-wales.police.uk/media/655600/annual-monitoring-report-on-the-welsh-language-18-en.pdf</p> <p>It is realistic for HNP to adopt NWP's approach and for all construction workers to have level 1 Welsh language skills. A one-day Welsh Language Awareness and basic Welsh language courtesy skills should be delivered as part of staff induction. Free 'Work Welsh' resources are also available online. Croeso Cymraeg Gwaith/ Welcome Work Welsh is a 10 hour self-study course for absolute beginners and Croeso Nôl is a follow on 10 hour online course. https://learnwelsh.cymru/</p> <p>Over time, IACC expect the developer to be committed to developing the overall language profile of its staff so that by Operation and Decommissioning phases a profile similar to that of NWP is achieved.</p> <p>3. Ongoing monitoring is required to assess whether targets are being met. Should targets not be met, intervention and mitigation would be required to ensure that the target will be met.</p>
Q2.10.38	Applicant, IACC, GCC and WG	Q	<p>Applicant – please set out/signpost where it can be found, your proposed monitoring strategy for the Welsh language including how frequently monitoring would be undertaken; what area the monitoring would cover; who would review the monitoring; what actions would result from the monitoring and how the monitoring would be secured/funded.</p> <p>IACC, GCC and WG please set out how frequently you consider monitoring should be undertaken; what area should be monitored; who should review the monitoring; what actions should result from the monitoring and how you would want to see the monitoring secured/funded.</p>	<p>HNP has prepared a draft Welsh Language and Culture Mitigation and Enhancement Strategy which the IACC has commented on.</p> <p>IACC's position on monitoring is set out in its LIR [REP2 – 069]. In its response to Measure 21 IACC requests that:</p> <ul style="list-style-type: none"> central leadership and management buy-in from Horizon on WLCMES delivery and accountability (paragraph 6.9.19.39); suitable, acceptable and robust monitoring and evaluation measures (paragraph 6.9.19.36); a more robust scrutiny role for IACC and the External Stakeholder Group in the monitoring and evaluation process, including the appointment of an independent chair (paragraph 6.9.16.46); an annual review of HNP's Welsh Language Skills Strategy a formal published annual Corporate Welsh Language Policy monitoring report; an annual independent evaluation of the WLCMES Strategy and Action Plan; continuation of monitoring and evaluation processes beyond the proposed Construction Phase to cover both Operation and Decommissioning Phases.

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Q2.10.39	Applicant	Q	<p>1) Provide details of which of the various proposed S106 funds would contribute funding towards Welsh language and culture.</p> <p>2) As the funding appears to be spread across a number of funds indicate the total amount that would be available to fund Welsh language and culture</p>	3)
Q2.10.40	IACC, GCC and WG	Q	<p>You have raised concerns regarding the robustness of the Welsh Language Impact Assessment (WLIA) – was the scope of the WLIA agreed with you prior to submission?</p>	<p>The WLIA Scoping Report [APP – 432, Volume A.4] was published in September 2014 for consultation with key stakeholders, which included IACC, Gwynedd Council and WG.</p> <p>The IACC agreed in its response that the methodology used by HNP followed best practice at the time.</p> <p>However IACC has consistently throughout the PAC rounds raised concerns that the application of the methodology for some assessments of impacts – particularly on the population and community dimensions – have not been sufficiently robust. In IACC’s view overall there are considerable weakness in the assessment of likely effects, particularly in terms of project wide and inter-project temporal and spatial effects.</p> <p>As a result, in IACC’s view the likely effects are underplayed and the proposed mitigation and compensation measures deficient.</p> <p>Further information on the detail is provided below:</p> <p>Following the Phase 1 Pre-Application Consultation a Preliminary WLIA was prepared and subsequently shared with the WLIA Steering Group in late 2015 and with IACC in January 2016. An interim WLIA was published as part of PAC 2 which, inter alia, produced a descriptive summary of likely effects during construction (Chapter 6), operation (Chapter 7 and decommissioning (Chapter 9).</p> <p>In its response to PAC2, IACC raised its concern that the WLIA “does not fully consider the likely direct and indirect impact of the project, especially by construction workers and their dependents, on the Welsh language and culture” . There was also concern raised that the analysis presented a “static interpretation of likely impact” and a suggestion made that the assessment should include a series of potential scenarios of possible emergence of Welsh speakers over time” [APP – 432, ref. Table A7, page 41].</p> <p>The draft WLIA and WLCMES Strategy was provided to statutory and key non-statutory stakeholders in September 2017. The issues raised in response tended to focus on the mitigation and enhancement measures rather than the Assessment itself.</p> <p>The final WLIA document was submitted as part of the DCO in May 2018.</p>

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Q2.10.41	Applicant	Q	Have the possibilities of on-line training in the Welsh language been considered?	
Q2.10.42	IACC	Q	<p>As a destination for tourism, the population of the island fluctuates throughout the year:</p> <ol style="list-style-type: none"> 1) On average how many tourists visit the island at the peak of the season? 2) How many of these tourists are Welsh speakers? 3) Has there been any noted effect on the Welsh language as a result of this annual influx of visitors and the recent growth in tourism? 	<ol style="list-style-type: none"> 1. According to STEAM 2017 data, 248,000 tourists visited the Island during August peak. On average during the peak season (June – August) 624,000 tourists visit the Island (of a total 1.71M for the year). 2. The IACC do not have this data. The majority of the IACC's visitors (85% repeat visitors) come from within a 2-hour catchment area. The majority come from the North West of England (particularly to the non-serviced accommodation), but equally visitors could come from other parts of Wales. 3. The IACC does not have any evidence that there is a correlation between growth in tourism and impact on the Welsh Language. The only correlation is the spatial distribution of the percentage of Welsh speakers on Anglesey per ward [REP2-167 and REP2-168]. The lowest percentages of Welsh speakers are in the coastal 'tourist hotspots' of Trearddur Bay, Rhosneigr, Benllech and Beaumaris. The highest percentage of Welsh speakers are in the in-land wards of Cyngar, Tudur and central Anglesey. It is to these tourism 'hotspots' that people tend to retire to (linked to Q2.10.43 below) which means that the Welsh language in these wards is deteriorating and the Welsh language in 'central Anglesey' wards remains relatively steady. This is evidence from maps in REP2-174 and REP2-175 which shows the spatial distribution of Welsh language capability of people aged 60- 74 and 75+.
Q2.10.43	IACC	Q	<p>You have referred to the fact that Ynys Môn has become a place that people retire to and that this is the largest growing section of the population:</p> <ol style="list-style-type: none"> 1) How many people retire to the island? 2) Of these how many are Welsh speakers? 3) Of the non-Welsh speakers what opportunities are provided for them to learn Welsh and how many do? 4) Has there been any noted effect in the Welsh language as a result of this increase in the population? 	<p>1) Anglesey, the KSA and the DCCZ in common with several areas in Wales contain an overall ageing population. The percentage of the population aged 65 and over on Anglesey that spoke Welsh in 2011 was around 49.5% (KSA 55%; DCCZ 37%) (APP – 432 Figure A-9, page 86]. Analysis of the components of population change for the period 2011/12 to 2015/116 show that average annual net in-migration is 53 compared to a net fall in annual natural change (deaths over births) of -64. The largest driver of change is an average annual in-migration of 2,466 (including an average of 128 international migrants) (Anglesey and Gwynedd Joint LDP, Background Report 3A).</p> <p>2) The 2011 Census of Population contains information on the number and characteristics of households who moved from elsewhere to the island in the year previous to the Census (March 2011). [Table CDW8201 WA Migration Statistics for Wales]. In summary:</p> <ul style="list-style-type: none"> • Based on Census returns it is estimated that 863 households moved to the Island in the previous 12 months; • Of these, 266 (31%) lived elsewhere one year previously in other parts of Wales and 597 (69%) lived elsewhere one year previously outside Wales;

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				<ul style="list-style-type: none"> Of the 597 households who lived elsewhere one year previously outside Wales, 510 (71%) had no dependent children – of these 442 (79%) households had no adults who could speak Welsh; This latter percentage compares with the 511/918 (56%) of households who moved within the island and 117/202 (58%) households who lived in other parts of Wales one year previously where at least one adult could speak Welsh; The WLIA analysis of in-migrants by age and destination from within the UK [APP -432 ref: Figure A13, page 96] for the year 2014 – 15 suggests that over two thirds of in-migrants in the age categories 45 – 64 and 65 and over are from the rest of the UK outside Wales. To IACC's knowledge, annual statistics are not collected/not readily available on the linguistic capabilities of people who choose to move to the island to retire. Whilst the category of in-migrant households is likely to include households other than retirees, it does suggest that historically a high proportion of households moving to the Island who do not have dependent children and who come from outside Wales are likely to be retirees. <p>3) Community Welsh for Adults courses are provided by learnwelsh.cymru north west Bangor University. This academic year (2018/2019) 32 Welsh for Adults courses were offered across Anglesey (Abberffraw, Beaumaris, Holyhead, Cemaes, Llanbedrgoch, Llanfairpwll, Llangefni, Moelfre, Niwbwrch and Y Fali. 348 learners were registered on these courses of whom 22% were aged 65+.</p> <p>4) The number of non-Welsh speaking adults who currently attend Welsh classes amount to between 1% and 2% of the total non-Welsh speaking adult population on Anglesey. The ability of such classes to reverse the negative impact of non-Welsh speaking adults who move to work or retire to Anglesey is negligible (source Bangor University).</p>
11.	Traffic and Transport			
Q2.11.1	IACC, GCC and WG	Q	Provide further details of the proposed park and share sites including: <ol style="list-style-type: none"> 1) Their location and capacity. 2) Whether the sites already exist or are in the process of being consented/constructed? 3) If sites are subject to consent/construction an indication of when they would be available for use. 4) Whether workers would be charged to use the facilities and if so what the rates would be. 5) How would workers be encouraged/required to use these sites? 6) Are the proposed sites to be used by workers car sharing or would they be directly connected to the WNDA? 7) How would the park and share sites be linked to the current application? 	Menai Bridge P&S <ol style="list-style-type: none"> 1) Planning Ref: 39LPA1046/CC Location: Part of field opposite Four Crosses Public House, Ffordd Penmynydd, Menai Bridge, LL59 SLY. Capacity: The Park and Share complex will accommodate 109 vehicles (including 96 car parking spaces, 7 disabled and 6 motorcycle spaces). The site will also have a bus stop. There will be 7 no. EV charging points incorporated within the scheme and the DAS states that there will also be provision for pedestrians/cyclists including a cycle shelter with spaces for a minimum of 10 cycles. Cyclists will access the site using the same existing footpath (wide enough to accommodate pedestrians). 2) A planning application for the site has been submitted to the LPA and was determined by the Planning & Orders Committee on 05/09/18. The Committee resolved to approve the application in accordance with the Officer's Recommendation and written report subject to the conditions contained therein and additional conditions in relation to ecological mitigation and the maintenance of the attenuation pond, and subject also to a Section 106

Reference	Respondent:	Location:	Question:	IACC RESPONSE
				<p>agreement.</p> <p>3) The site application will be subject to a Section 106 agreement which will ensure the permission is not implemented if Wylfa Newydd is not developed. The IACC cannot confirm when the site may become available for use as discussions regarding land acquisition are currently ongoing with the current landowner.</p> <p>4) This would need to be agreed between Horizon, IACC and WG.</p> <p>5) These facilities would allow the workforce to safely and conveniently car-share the onwards journey to the WNDA or Dalar Hir P&R. The site is located in close proximity to the A55 and existing public transport routes as well as near an existing settlement on the strategic highway network which will encourage usage of the site and reduce single occupancy journeys. There needs to be inclusion within the CoCP regarding the use of the P&S sites and identification by Horizon on how workers would be encouraged/required to use these sites.</p> <p>6) The justification for these proposed sites is to accommodate construction staff not accommodated in the North-West, the Western and Holyhead regions of Anglesey. It is the intention that the spaces would be used by car sharers who would then use the WNDA or Dalar Hir P&R, or be served by Horizon shuttle buses for direct access to WNDA.</p> <p>7) The proposal will mitigate against the potential risk of fly parking during construction of the Wylfa Newydd Nuclear Power Station to the benefit of residents in the close vicinity by minimising the risk of fly parking and highway safety. The proposal promotes sustainable means of transport and will leave a legacy use for the people of Anglesey following the construction period of the Wylfa Newydd Project. The use of the P&S sites is to be agreed between WG, IACC and Horizon in advance.</p> <p>Gaerwen P&S</p> <p>1) Planning Ref: FPL/2018/30 Location: Part of agricultural field adjacent to Junction 7, A55 Expressway (Eastbound Carriageway), Gaerwen, LL61 6AR. Capacity: The Park and Share complex will accommodate 116 vehicles (including 103 car parking spaces, 7 disabled and 6 motorcycle spaces). The site will also have a bus stop. There will be 5 no. EV charging points incorporated within the scheme (with the provision of 4 spaces available to expand) and the DAS states that there will also be provision for pedestrians/cyclists including a cycle shelter with spaces for a minimum of 10 cycles. Cyclists will access the site using the same existing footpath (wide enough to accommodate pedestrians).</p> <p>2) Application for the site has been submitted to the LPA but is not yet determined. As this application is also submitted by the Council it will be subject to determination at the Planning & Orders Committee details of which are yet to be confirmed. It is envisaged that the application will be presented to IACC Planning</p>

Reference	Respondent:	Location:	Question:	IACC RESPONSE
				<p>Committee during Spring 2019.</p> <p>3) The application does not stipulate whether a Section 106 agreement will be applied at present and is subject to outcome of the Planning & Orders Committee. As the IACC is the current land owner, works to construct the facility could commence immediately following any grant of planning approval and dependant on receiving external funding from Welsh Government.</p> <p>4) This would need to be agreed between Horizon, IACC and WG.</p> <p>5) These facilities would allow the workforce to safely and conveniently car-share the onwards journey to the WNDA or Dalar Hir P&R. The site is located in close proximity to the A55 and existing public transport routes as well as near an existing settlement on the strategic highway network which will encourage usage of the site and reduce single occupancy journeys. There needs to be inclusion within the CoCP regarding the use of the P&S sites and identification by Horizon on how workers would be encouraged/required to use these sites.</p> <p>6) The justification for this site is an identified need for this facility on the island generally. The facility would provide an opportunity for workers residing near to this facility to access buses or car-share in addition to its wider use.</p> <p>7) The proposal will mitigate against the potential risk of fly parking during construction of the Wylfa Newydd Nuclear Power Station to the benefit of residents in the close vicinity by minimising the risk of fly parking and highway safety. The proposal promotes sustainable means of transport and will leave a legacy use for the people of Anglesey following the construction period of the Wylfa Newydd Project. The use of the P&S sites is to be agreed between WG, IACC and Horizon in advance.</p>
Q2.11.2	Applicant	Q	Planning permission has been granted for the on-line highways works – when would work commence on site?	
Q2.11.3	IACC, GCC or WG	Q	What is the maximum vehicle size that could cross the Menai Bridge?	IACC are deferring to WG.
Q2.11.4	Applicant, IACC, GCC and WG	Q	What would be the stacking arrangements for HGVs on the mainland in the event of Britannia Bridge closing?	IACC are deferring to GC and WG.
Q2.11.5	Applicant, WG and NWP	Q	1) Are Abnormal Indivisible Loads (AILs) required by law to be escorted by Police in Wales? 2) If they are not, is the Applicant proposing to use the Police or another organisation to escort the AILs? 3) Would an AIL management plan be required? 4) How would AILs be managed prior to the opening	5)

Reference	Respondent:	Location:	IACC RESPONSE	
			of the MOLF and the improvements to the A5025?	
Q2.11.6	Applicant, IACC, GCC, WG and NWP	Q	<p>Would an early year's strategy for highways movements, including any necessary arrangements that may arise if the MOLF or highways works were delayed, be required?</p> <p>If yes could this be delivered by a suitably worded requirement?</p>	<p>The IACC, as Highways Authority, has consistently and repeatedly emphasised the need for an Early Years Strategy (the construction period for the Associated Developments, MOLF, A5025 improvements, Site Campus Phase 1, and Site Mobilisation) which sets out the management and planning of Heavy Goods Vehicle (HGV) traffic movements. The Authority has previously raised these concerns in its formal response to the Pre-Application Consultation Stage Three (PAC3) dating back to July 2017, and has continued to form part of the main Traffic and Transport issues raised by the Authority in its Local Impact Report. As recently as Tuesday the 8th January, 2019 the Authority highlighted these concerns in the Issue Specific Hearings, and emphasised the need for an appropriate cap on HGV movements during the Early Years of the project to safeguard the interests and safety of local residents whom currently reside adjacent or near the A5025. The Authority considers that the proposed HGV cap of 2,500 One-Way HGV deliveries a month [5,000 Two-Way a month] and 22 One-Way HGV deliveries an hour [44 Two-Way an hour] submitted by HNP for the Early Years is inappropriate and will generate adverse impacts on the local residents and communities. The Authority would consider a maximum 40% increase in HGV traffic above HGV baseline flows a more appropriate cap prior to opening of Off-Line bypasses.</p> <p>The IACC has no preference whether this cap is set out in the CoCPs or a requirement provided that in either case it is suitably precise and enforceable in its terms.</p>
Q2.11.7	Applicant	Q	<p>The proposed road layout for accessing the Dalar Hir Park and Ride site would not currently comply with design guidance. Can you:</p> <ol style="list-style-type: none"> 1) agree and alternative layout with the relevant highways authority; and 2) submit amended plans that would be within the DCO envelop showing the agreed layout. 	
Q2.11.8	Applicant, IACC, GCC and WG	Q	<p>The proposed level and location of parking is predicated on a significant number of workers car sharing. However, the levels of car sharing at Hinkley Point C are below those originally estimated.</p> <ol style="list-style-type: none"> 1) How would the necessary levels of car sharing be secured? 2) Should it be secured through a Requirement? 3) What should happen if the necessary levels are not achieved? 	<ol style="list-style-type: none"> 1) In the CoCP, Horizon has identified that there will be a car share policy communicated to employees and a car sharing database available, and that the Construction Worker Accommodation Management Portal could be used as a basis to form the database. There needs to be a more robust approach to securing the car share levels, in terms of intervention by a Travel Management Plan Co-ordinator. 2) The levels of car sharing that Horizon has identified would need to be secured through a requirement. 3) Horizon should identify additional mitigation measures and/or contingency funding which can be called upon by IACC should monitoring demonstrate that the car sharing levels are not being met. The details of the monitoring, the reporting periods and the time required to initiate the additional measures must be agreed with IACC prior to commencement of development.

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Q2.11.9	Applicant	Q	Can you confirm whether the traffic modelling included or excluded the HGVs that would be generated by the decommissioning of Wylfa A and if they were included what effect their omission would have on the baseline model?	
Q2.11.10	Applicant	Q	Can you confirm whether the traffic modelling/Transport Assessment considered blue light response times and if not, why not.	
Q2.11.11	GCC	Q	You [REP2-297] have suggested that limits should be set for all construction vehicles not just HGVs. Can you: 1) explain why you consider this would be necessary; 2) advise what you consider the necessary thresholds should be; 3) outline how you would want to see it secured, and 4) explain who it could be monitored	
Q2.11.12	Applicant	Q	Can you explain whether the Active Travel (Wales) Act 2013 would need to be considered and if so what the implications for the proposal would be?	
Q2.11.13	Applicant	Q	Has any work been undertaken to model the availability of the MOLF (such as historic wind strength and sea state data) and were the outputs of this modelling factored into the Transport Assessment/traffic modelling?	
Q2.11.14	Applicant	Q	The IACC, GCC and WG have all raised concerns regarding the potential for 'fly parking'. How do you propose to deal with this matter?	
Q2.11.15	Applicant	Q	Concerns have been raised regarding the age of the traffic and accident data used in the Transport Assessment/traffic modelling. Can you: 1) explain why this data was used; 2) advise whether there is any more recent data available; and 3) if more recent data was to be used would this	

Reference	Respondent:	Location:	IACC RESPONSE	
			result in different outputs?	
Q2.11.16	Applicant, IACC, GCC and WG	Q	The pre-commencement works proposed would be quite wide ranging and would require a significant number of vehicle movements. Would these works need to be managed and if so how should this be secured?	<p>The IACC considers that, as a minimum, the HGV caps imposed to the delivery of the A5025 offline improvements should apply to all project traffic, including movements related to pre-commencement works. The IACC considers that this should be secured through a requirement.</p> <p>PW[x]</p> <p>(1) Prior to the opening to traffic of all of the A5025 offline improvements, being Works 8, 9, 10 and 11), HGV movements must not exceed [335](2-way) movements per day Monday to Friday and a maximum 100 (2-way) movements between 08:00-13:00 on Saturday.</p> <p>These figures are based on data provided by HNP within their baseline in which discussions are ongoing over their adequacy.</p>
Q2.11.17	Applicant, IACC, GCC and WG	Q	<p>The traffic proposals are predicated on the basis that the majority of 'bulk materials' would be delivered by the MOLF.</p> <ol style="list-style-type: none"> 1) Does 'bulk material' need to be defined and if so what should the definition be? 2) Explain whether the 60% target for bulk materials would be from day 1 of the opening of the MOLF or would this be cumulative across the construction period as a whole? 3) How would this be monitored and what would happen if the target was not achieved? 	<p>The IACC considers that bulk material should include all building materials. The 60% minimum should apply to all such materials required for the project regardless of when they are required and should apply for the entirety of the project, not just from the opening of the MOLF.</p> <p>The IACC considers that the most practical way of monitoring this and controlling the impacts of use of the MOLF is through the imposition of a cap on the number of HGVs allowed to access the site. This would mean that should the required use not be made of the MOLF, this would be apparent through the increased use of road transport. A cap would also prevent under-use of the MOLF creating unacceptable traffic and environmental impacts by increasing road use to an unacceptable level.</p>
Q2.11.18	Applicant, IACC, GCC and WG	Q	<p>NWP advocate the need for a construction traffic management plan and an operational traffic management plan.</p> <ol style="list-style-type: none"> 1) Do you agree? 2) If not, why not? 3) If you do agree what should the plans control and how should they be secured? 	The IACC consider that traffic management plans are a normal requirement for any large scale development and should be required for this project.
Q2.11.19	L&L	Q	Would the additional buses needed to transport workers from Cae Glas and Kingsland effect the outputs of the Transport Assessment/traffic modelling?	
12.	Costal Change			
Q2.12.1	The Applicant		NRW [REP4-039 para 4.2.1] still has uncertainties about the reflected wave conditions and changes to hydromorphology in relation to sediments at Cemlyn Bay which it advises needs to be considered further.	

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			Can the Applicant and NRW come to an agreed position?	
Q2.12.2	The Applicant		At the ISH on 11 January 2019, the Applicant [REP4-004, page 10] agreed to consider what additional detail can be included within the Construction Method Statement to provide further details on shoreline protection. At what stage will these details be available?	
Q2.12.3	The Applicant		The Applicant [REP4-004, p8] stated that it would provide a monitoring programme and adopt an adaptive management approach to coastal change hydrogeomorphology in response to the NTs concerns. At what stage will these details be available?.	
13.	Deadline 4 Change Requests			
	Worker Shift Patterns			
Q2.13.1	Applicant	Q	Provide further explanation as to why the proposed change to workers shift patterns is required with particular reference as to why it is considered that the first three hours of shifts as currently proposed would be 'unproductive' (para 2.3.2 REP4-011).	
Q2.13.2	Applicant	Q	If the proposed change to shift patterns would improve productivity how would this affect the timetable for the delivery of the proposed project?	
Q2.13.3	Applicant	Q	It is unclear to whom the proposed change to shift patterns applies. Clarify whether it would be for all workers at all sites or just for those workers based at the WNDA?	
Q2.13.4	Applicant	Q	<p>You refer (para 2.5.5 of REP4-011) to the fact that a 'minority' of staff (such as catering, security, cleaning and some specialist staff) would not follow the proposed shift pattern.</p> <p>1) How many workers would the proposed shift pattern apply to?</p> <p>2) How many is a 'minority' of staff?</p> <p>3) What would the shift pattern for this group be?</p>	
Q2.13.5	Applicant	Q	Under the proposed change request for working hours some construction activity would operate at WNDA 24/7. However, under the proposed shift patterns there would be no staff (apart from the staff referred to in the question above) on site for an hour between 06:00 and 07:00 and for an hour/hour and a half between	

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			18:00/18:30 and 19:30. 1) Which types of activities would require staffing 24/7? 2) How many staff would be required to run these activities? 3) Would they require a different shift pattern and if so what would this shift pattern need to be?	
Q2.13.6	Applicant	Q	1) When would a worker using the Park and Ride at Dalar Hir start their shift – when they reach Dalar Hir or when they reach the WNDA? 2) If it is when they arrive at the WNDA what time would they need to be at the Park and Ride facility and has the need to arrive at the Park and Ride prior to the start of their shift been factored into the transport modelling?	3)
Q2.13.7	Applicant, IACC, GCC and WG	Q	Would the AM and PM peak for commuter traffic change/extend as a result of the proposed shift patterns for workers and if so what effect would this have on the conclusions of the Transport Assessment/traffic modelling, with particular reference to Britannia Bridge?	The Highway Authority do not foresee any significant issues arising from this proposal, however would note that traffic movements (both construction worker vehicles and shuttle buses) will be concentrated over a single or double shift, rather than spread over three shifts.
Q2.13.8	Interested Parties		1) Any comments with regards to the proposed change to workers shift patterns? 2) With regards to the proposed change would it result in a material or non-material change to the application? Please explain your reasoning.	See Appendix A for response
HGV Movements				
Q2.13.9	Applicant	Q	What would be the economic consequences and effects on the timeline for construction activities if the proposed increase in hours only became effective after the on and off-line highways works to the A5025 were completed?	
Q2.13.10	Applicant	Q	The explanation provided for the proposed change is to ensure that HGV deliveries to the WNDA would be maintained in the event of unforeseen delays such as the MOLF being unable to operate due to bad weather. Yet, the proposed number of HGV movements overall would remain unchanged. Explain the reasoning further and how this would be achieved?	
Q2.13.11	Applicant	Q	In paragraph 2.3.5 of the change request [REP4-013] improving the frequency of HGV deliveries is said to enable acceleration of the construction programme.	

Reference	Respondent:	Location:	IACC RESPONSE	
			1) How would the proposed change enable this? 2) How would this be possible if the overall number of HGV movements on a daily/monthly/annual basis would remain the same? 3) Provide a visual aid which illustrates the difference in the two scenarios- with and without the change request.	
Q2.13.12	Applicant	Q	Can you explain why all the properties which would suffer a significant adverse effect (325) would not be eligible for mitigation such as noise insulation?	
Q2.13.13	IACC	Q	1) How should the use of a low noise road surface referred to in the Design and Access Statement Volume 3 [REP4-018 and 019] be secured? 2) Given the limited reduction in noise that it would achieve would it be necessary? 3) What consideration has been given to the use of a Very Low Noise Surfacing in those areas that would be subject to increased noise?	1) The low noise road surface (LNRS) should be secured via a specific requirement referencing its provision or by a wider ranging requirement requesting that Horizon submits detailed construction drawings to the IACC for prior approval. 2) LNRS is proposed by Horizon for the on-line improvements in addition to certain sections of the off-line. Horizon has undertaken its assessment of noise generated by road traffic with the assumption that LNRS is in place and IACC would therefore expect it to be delivered. 3) VLNR can achieve more substantial noise reductions. IACC is however content that the reductions delivered using LNRS are sufficient.
Q2.13.14	Applicant	Q	1) What is the dB L _{Aeq,T} World Health Organisation's Night Noise Guidelines for Europe for the night time period and what is the definition of night time? 2) What would be the effect if this, rather than the daytime criteria, was applied to the 19:00 to 23:00 period with specific reference to properties that would experience a significant adverse effect?	3)
Q2.13.15	Applicant and IACC	Q	How should the proposed change be secured in the dDCO?	The IACC consider that adherence to the appropriate levels can be secured through specification in the relevant CoCPs provided that the wording of the CoCPs is precise enough.
Q2.13.16	Interested Parties	Q	1) Any comments with regards to the proposed change to workers HGV movements? 2) With regards to the proposed change would it result in a material or non-material change to the application? Please explain your reasoning.	See Appendix A for response
Working Hours				
Q2.13.17	Applicant	Q	1) Explain why a proposed change in the working hours on site would give rise to the need for additional internal haul roads. 2) Provide a plan showing the route of the additional	3)

Reference	Respondent:	Location:	Question:	IACC RESPONSE
			internal haul roads.	
Q2.13.18	Applicant	Q	Explain why it is more appropriate to assess the effect of the proposed change against the qualified residual effects set out in the change request rather than through the Environmental Statement? [Para 2.5.5 of REP4-012].	
Q2.13.19	Applicant	Q	How many residential receptors is the 25% referred to in paragraph 2.5.44 [REP4-012] that would no longer experience major adverse significant effects compared to the current application?	
Q2.13.20	Applicant	Q	1) How would the proposed change to working hours affect occupants of the TWA? 2) What measures are proposed to mitigate the effect on the living conditions of the occupants of the TWA?	3)
Q2.13.21	Applicant	Q	By reference to the construction timeline, explain at what periods of time the works to which the change request refers would take place and the duration over which these works would occur.	
Q2.13.22	Interested Parties	Q	1) Any comments with regards to the proposed change to working hours? 2) With regards to the proposed change would it result in a material or non-material change to the application? Please explain your reasoning.	See Appendix A for response
General Question on Change Requests				
Q2.13.23	Applicant	Q	The dDCO, CoCP and other control documents would need to be amended if the change requests [REP4-011, 012 and 013] were to be accepted into the Examination. Provide a list for each change request of the documents that would require to be updated?	
14.	General Questions			
Q2.14.1	The Applicant (and NRW & IACC)	All	Paragraph 1.1.1 of the Mitigation Route Map Rev. 2.0 [REP2-038] refers to the Environmental Permitting Regulations 2010. However, other parts of the Mitigation Route Map refer to the Environmental Permitting (England and Wales) Regulations 2016. Given the scope of the Environmental Permitting (England and Wales) Regulations 2016 (and the Revocations set out in Schedule 28 of the 2016 Regulations), should paragraph 1.1.1 refer to the	The reference should be to the Environmental Permitting (England and Wales) Regulations 2016.

Reference	Respondent:	Location:	IACC RESPONSE	
			Environmental Permitting (England and Wales) Regulations 2016?	
Q2.14.2	Applicant	Q	Will the delay in the Site Preparation and Clearance Works resulting from the application being called in: 1) affect the overall phasing/programme? 2) Do any of the documents need to be updated/revised to reflect this change?	
Q2.14.3	Applicant	Q	Have the effects (traffic movements, number of workers, construction period etc) of the construction of the spent fuel storage facility which would only be started after the main construction has been completed been modelled and how would they be managed?	
Q2.14.4	Applicant and IACC	Q	1) Could the port of Holyhead be used for moving bulk goods prior to the opening of the MOLF? 2) Was this considered and if so why was it not included as an option?	There is current capacity to deal with some bulk material, but not all materials prior to opening of MOLF. The Port authority (Stena Line Ports) have proposals to significantly enhance Port capacity and infrastructure (land reclamation). Work is progressing, focussing on licencing and permitting. Enhanced capacity could be available within the Port of Holyhead to assist with the moving of bulk goods.
Q2.14.5	NACP	Q	You refer [REP2-333] to the potential for a scheme for 200 houses at Madyn Farm, Amlwch to be used by workers. Please provide further details including how many workers the scheme could accommodate.	<p>This question is not directed to the IACC, but the IACC would like to comment.</p> <p>Madyn Farm was part of Horizon's Construction Worker Accommodation Strategy up until PAC2. This was a 50 unit housing scheme which would be able to accommodate 200 workers during construction. After the construction period, these houses would be transferred over to the IACC (or to an RSL) as legacy housing. With Horizon's Workforce Accommodation Strategy changing to include a larger on-site campus (500 to 4,000) the Madyn Farm housing scheme was not pursued.</p> <p>The IACC note Horizon's response to the IACC's LIR [REP3-004 section 2.8.9] where they state "<i>since the issue of the draft DCO s.106 agreement Horizon has reconsidered its position on direct delivery of residential units and is now willing to commit to early delivery of the Madyn Farm Site in Amlwch. This is a site allocated for housing with planning permission, which Horizon has control of. If IACC are supportive of such an option, this could be secured as part of the capacity enhancement proposals (i.e. direct delivery of Madyn Farm and a corresponding reduction in the capacity enhancement contribution proposed in Schedule 5 of the DCO s.106 legal agreement)</i>".</p> <p>The IACC are still in s.106 negotiations with Horizon and this option of developing Madyn Farm (either direct delivery, joint venture or other) should remain open. As the delivery of Madyn Farm would only provide 50 units (IACC's LIR indicates that 520 are required) the IACC could not agree to a reduction in the capacity enhancement contribution in lieu of Horizon directly delivering Madyn Farm. However, with other developers or funding streams, it could become a viable option.</p>
Q2.14.6	Applicant	Q	Would the proposed Community Infrastructure Fund bridge gaps in the resourcing of public services (eg community policing) where further unanticipated	

Reference	Respondent:	Location:	Question:	IACC RESPONSE
			impacts arise or would this be the subject of a separate contingency fund?	
Q2.14.7	WG	Q	<p>You [REP2-367] are seeking a contribution to the proposed third Menai crossing. Can you:</p> <ol style="list-style-type: none"> 1) Explain on what basis a contribution is being sought? 2) Explain how such a contribution would meet the S106 tests? 3) Detail how much the contribution would be. 	
Q2.14.8	Applicant and IACC	Q	Could/should the Trywydd Copr/Copper Trail revert back to its original route (ie away from the A5025) after the construction period?	The Copper Trail cannot revert to its original route as Cemlyn Route is to be permanently stopped-up following the erection of the perimeter fencing. The Copper Trail currently uses Cemlyn Road as its route between Cemlyn Bay and Llanfechell (via Tregele). The Copper Trail cycle route is to be diverted onto Nanner Road once the perimeter fence has been erected. Horizon has completed improvements to Nanner Road in anticipation of the closure of Cemlyn Road which included the provision of new passing places for vehicles and the resurfacing of the entire route. In addition to the improvements to Nanner Road, as part of the A5025 Online Highway Improvements, Horizon is to provide a segregated cycle path along the A5025 for the section that is required in order to complete the link between Nanner Road and Llanfechell.
Q2.14.9	Applicant	All	Should the General Glossary [APP-006] include a definition of 'power island'?	
Q2.14.10	Applicant and all Interested Parties	All	<p>The ISHs in March will consider the proposed WNDAs and its constituent spatial elements in particular what is proposed for the site; what mitigation would be required and how this would be secured through the dDCO, CoCP and subCoCPs or the S106.</p> <p>The ExA propose to consider the WNDAs as a whole but also propose on an individual basis to address the Marine Off Loading Facility and Breakwater; the Main Power Island Site; the Site Campus/Temporary Workers Accommodation and the other on-site developments.</p> <p>In considering these elements particular attention will be paid to issues in relation, but not limited, to the following effects individually and in combination:</p> <ul style="list-style-type: none"> • Landscape and visual; • Historic environment; • Good design; • Lighting; • Noise and Vibration; • Air Quality and Dust; and 	<p>This list sets out the issues IACC considers not to be agreed and unlikely to be agreed before the hearings in March. The IACC has prepared this list in response to the question and based on the information available to it. This list is not exhaustive and may change in response to deadline 5 submissions or further discussion. The IACC also notes that issues not on this list may arise in later deadlines or at the hearings and reserves the right to raise such issues.</p> <p>Air Quality</p> <ol style="list-style-type: none"> 1. NO2 concentration at A55 layby at Llanfairpwll 2. Monitoring of air quality at all Associated development sites 3. WNDAs – NOx/NO2 monitoring <p>Noise and Vibration</p> <ol style="list-style-type: none"> 1. Noise Monitoring at Site Campus 2. Blasting Strategy – fixed and regular blasting times to be committed to <p>WNDAs</p> <ol style="list-style-type: none"> 1. Mitigation proposed for Annex I habitat not demonstrated to be sufficient. 2. Effects of the project on bathing water quality at Cemaes

Reference	Respondent:	Location:	IACC RESPONSE	
			<ul style="list-style-type: none"> Waste management and radioactive waste management. <p>A second ISH on 'Other Sites' will consider the same range of issues on a similar basis for:</p> <ul style="list-style-type: none"> Off Site Power Station Facilities site; Dalar Hir Park and Ride site; Parc Cybi Logistics Centre; A5025 Off-line Highways Improvements; and Ecological Compensation sites. <p>With reference to the emerging SoCG are there any areas/topics in relation to the WNDA or the Other Sites where you consider agreement may not be reached before the end of the examination, bearing in mind the evidence both oral and written that has been submitted to date, and which you would wish the ExA to consider at these ISHs?</p>	<ol style="list-style-type: none"> Compensation for the loss of the Wales Coastal Path during construction phase and for the permanent inland diversion Soil Management Measures – Enforceability and Precision Remediation Strategy – Delivery of further measures and plans in particular to address unexpected contamination The need for comprehensive surveys on and around the WNDA site, prior to work commencing on the site, to include aerial photographic surveys, a register of field names, surveys of hard landscape elements that identifies their locations, materials, condition and contribution to landscape character and visual amenity and updated survey of soft landscape elements that identifies their locations, species, size, condition and contribution to landscape character and visual amenity. Details of the measures to be employed to protect all landscape elements that are to be retained on and around the WNDA site during the construction phase, including a scheme of monitoring to ensure that these measures are working Comprehensive schemes for landscape establishment, reinstatement, enhancement and maintenance for the WNDA site to include all proposed landform and drainage details, all hard landscape elements (locations, materials and construction details), all soft landscape elements (locations, species, provenance, sizes, numbers, planting densities, seeding rates, etc), a specification for the landform construction, groundworks, drainage, soiling, seeding, planting and maintenance operations, and a programme of operations for the establishment and maintenance. Maintenance should be for the duration of each part of the project (with a minimum of 10 years post planting) and should include measures to control invasive species. Visual effects on the communities of Cemaes and Tregele in the construction period - this has a strong linkage with the lighting strategy – need to secure adequate funding for 'instant' screening at private properties as well as in public locations under community fund. Relates to the need to ensure that the proposed landscape works on the edge of the WNDA site are designed to maximise the opportunities for visual mitigation for these receptors (and users of some PRowS and the permanent diversion of the WCP); that they are implemented as early as possible in the construction period; maximise the use of the retained hard and soft landscape elements; and where possible enhancing their condition and ensuring that they will fully integrate with the operation period landscape proposals as set out in the LHMS Visual effects on residential receptors in properties outside communities but close to the edge of WNDA in the construction and operation periods Visual effects upon recreational visual receptors using the PRow network - need compensation that allows for enhancement and maintenance of the PRow network close to the WNDA site and A5025 (Valley-Tregele). Waste Management – Lack of robust assessment of the waste impacts of the project and the need to manage waste in accordance with waste hierarchy Lack of Visualisations showing the implementation of the indicative colour scheme for the main power station buildings as described in the DAS (REP4-016/017). IACC requires clarification as how far into the AONB significant effects would extend outside of the WNDA Compensation for the significant effects on the AONB - Environmental Fund for the duration of the Construction Phase plus 10 years to fund landscape and other improvements in parts of the AONB and Heritage Coast. Clarity regarding the combined impacts (noise, dust, vibration, lighting, visual

Reference	Respondent:	Location:	IACC RESPONSE	
				<p>impact, etc.) on Cestyll Garden and its associated Grade II* Listed Building (Corn Mill), and the measures proposed to mitigate these as much as possible. Although mitigation against physical damage arising from vibration is presented in outline, further detail of this mitigation proposal is required before it can be considered robustly. It is noted that safe working practices would be identified to avoid any lasting damage but no detail is provided to allow an assessment of the likely effectiveness of any mitigation proposals and for the degree of damage to this heritage asset, which is of 'the highest significance' in NPS terms, to be ascertained.</p> <p>17. Horizon has not yet demonstrated that the need for the development is overriding such that it warrants the loss of the Kitchen Garden, house plot, driveway and part of the Essential Setting of Cestyll Garden.</p> <p>18. Mitigation relating to Cestyll garden - delivery of a Cestyll Garden Management Plan</p> <p>19. Biodiversity net gain across WNDA and preservation of protected species</p> <p>20. Loss of foraging area for and disturbance to chough</p> <p>21. Assessment of Section 7 priority habitat that will be permanently or temporarily lost</p> <p>22. Water quality impacts to Nant Cemlyn and Cemlyn lagoon from Mound E runoff</p> <p>23. Horizon's assessments fails to properly consider the significance of the archaeological discoveries that have been revealed to date following the archaeological investigations. Accordingly, the policy test regarding significant harm to non-designated heritage assets of equivalent significance to scheduled monuments has not been met.</p> <p>24. Archaeological Programme of works - a scheme for the remaining archaeological investigation and recording will need to be produced. This will include a post excavation assessment, analysis, reporting and archiving, publication and dissemination. This will need to include heritage outreach and engagement.</p> <p>25. The value of the Dame Sylvia Crowe Landscape has been understated and the value/heritage significance of HLT3 should be high as a consequence of its high evidential, historical and aesthetic values and medium communal value</p> <p>26. The potential significance of short-term habitat loss and the isolation of the Dame Sylvia Crowe mound for 10+ years is underplayed. It should therefore be assumed that the population using the site will be lost for the duration of the works at least, and probably longer</p> <p>27. Felin Gafnan (Corn Drying House and Mill House) - The application does not offer a statement as to whether effects would constitute harm in policy terms, and no judgement is offered as to whether harm would be of substantial magnitude. The magnitude of change to setting during construction through visible and audible change to setting combined with light pollution and change to air quality could also approach or even amount to substantial harm, even where material damage through vibration could be avoided.</p> <p>28. Detailed lighting schemes for the WNDA site (construction and operational phases) that minimises the number of lighting columns, avoids light spill onto surroundings and ecological features and minimises night-time glow (to minimise effects on landscape character, the special qualities of the AONB and Anglesey's Dark Sky status aspirations).</p> <p>29. Design of the western breakwater (profile and height) – landscape, visual and cultural heritage impact</p>

Reference	Respondent:	Location:	IACC RESPONSE	
				<p>Site Campus/Temporary Workers Accommodation:</p> <ol style="list-style-type: none"> 1. Impact of the Site Campus on Tre'r Gof SSSI 2. Ensuring that the design of the Site Campus minimises adverse visual effects, particularly for recreational receptors using the retained Wylfa Head spur of the WCP and in western views from Llanbadrig Point and Trwyn y Parc areas. This issue relates primarily to the construction period but also to the initial operation period when the landscape within the Site Campus is to be restored. 3. Detailed design for the Site Campus (buildings and landscape), plus phasing of construction and reinstatement. This issue relates primarily to the construction period but also to the initial operation period when the landscape within the Site Campus is to be restored <p>Associated development Sites:</p> <ol style="list-style-type: none"> 1. Comprehensive surveys on and around the AD sites, prior to work commencing on these sites, to include aerial photographic surveys, a register of field names, surveys of hard landscape elements that identifies their locations, materials, condition and contribution to landscape character and visual amenity and updated surveys of soft landscape elements that identifies their locations, species, size, condition and contribution to landscape character and visual amenity. 2. Details of the measures to be employed to protect all landscape elements that are to be retained on and around the AD sites during the construction phase, including a scheme of monitoring to ensure that these measures are working. 3. Comprehensive schemes for landscape establishment, reinstatement, enhancement and maintenance for the AD sites to include all proposed landform and drainage details, all hard landscape elements (locations, materials and construction details), all soft landscape elements (locations, species, provenance, sizes, numbers, planting densities, seeding rates, etc), a specification for the landform construction, groundworks, drainage, soiling, seeding, planting and maintenance operations, and a programme of operations for the establishment and maintenance. Maintenance should be for the duration of each part of the project (with a minimum of 10 years post planting) and should include measures to control invasive species. 4. Detailed lighting schemes for the AD sites (construction and operational phases) that minimises the number of lighting columns, avoids light spill onto surroundings and minimises night-time glow (to minimise effects on landscape character, the special qualities of the AONB and Anglesey's Dark Sky status aspirations). 5. Visual effects on residential receptors in properties in the immediate environs of the Off-Site Power Station Facilities (not those located in the main part of Llanfaethlu). 6. Mitigation/enhancements at Parc Cybi (Trefignath and Ty Mawr)
15.	Good Design			
Q2.15.1	Applicant; IACC; WG		<p>In relation to the Spent Fuel Storage Facility (Building no 9-201) and the Intermediate Level Waste Storage Facility (Building no 9-202) explain:</p> <p>1) The phasing of construction in relation to the Main Power Station site construction programme and how</p>	<p>1) ES Chapter D1, para 1.5.3 (APP-120) states that construction of the SFSF and the ILWSF would commence after the Main Construction Phase and would be available for use 10 years into the operational phase.</p> <p>2) ES Chapter D1, para 1.6.235 (APP-120) states that these buildings could be required for 140 years after the end of power generation but could be considerably shorter than this as it depends on final disposal in the Government's planned GDF.</p>

Reference	Respondent:	Location:	IACC RESPONSE	
			<p>the development site would be accessed and serviced?</p> <p>2) The maximum potential length of time these buildings would be required?</p> <p>3) How, in the event of the two buildings being required beyond the operational and, potentially, decommissioning phases of the project,</p> <p>a. the size and boundaries of the site they would occupy;</p> <p>b. how they would be accessed, serviced and provided with car and cycle parking; and</p> <p>c. how they would appear in the landscape from a visual perspective – using illustrative plans if possible;</p> <p>4) Is the proposed design of these buildings, which may become 'stand alone' buildings in the wider landscape, of a high enough quality in relation to their location close to both the AONB and Cestyll (Grade II) Registered Park and Garden and would the materials used for their construction be sufficiently robust to stand for the period of time required?</p> <p>5) In the potential circumstances of a requirement for a very long operational life, would a different design approach be required and if so how might it be achieved?</p>	<p>3) a) and b) IACC will review and provide a response to HNPs response</p> <p>c) These two buildings are included in some of the photomontages (e.g. Vp 24 in ES App D10-8, document 6.4.65 (APP-199) but there are no photomontages showing how these buildings would appear once the Power Station buildings have been decommissioned.</p> <p>4) The locations of these two buildings is in the far south of the Power Station site (see dwg 2 in Volume 2) (REP2-017) and the proposed designs of these buildings, in the form of elevations and roof plans, are shown on dwgs 48 – 51 in Volume 2 (document 2.6.1) (REP2-017). They are very large and tall, but simple rectangular clad buildings with few (if any?) windows. The SFSF has walls which lean outwards and has a curved roof whereas the ILWSF has vertical walls and a shallow double pitched roof. The maximum parameters are provided in Table D1-2. IACC have not been able to locate any information on the materials, colours or profiles of the external finishes.</p> <p>5) Whether these buildings are required only until the reactors are decommissioned or for a very long operational life, it would be beneficial if the design of the exterior could be sympathetic to this location. The design principles in the DAS would apply.</p> <p>ES Chapter D10, para 10.4.30 confirms that, although the SFSF and ILWSF will be constructed during the first 10 years of the operational phase, the assessment of the construction of these buildings has not been included in the operational phase, but as part of the main construction phase. This means that construction activities in the southern part of the site will, in actuality, continue for the first 10 years of the operational phase but this has not been taken into account in the assessment of the operational phase. The IACC considers that this is an example of a failure to assess the "worst-case scenario" of impacts, particularly in relation to amenity impacts on nearby communities who, not unreasonably, are unlikely to expect construction works to continue for this period post construction of the power station.</p>
Q2.15.2	Applicant	Q	<p>NPS EN-1 states at paragraph 4.5.1 that "applying 'good design' to energy projects should produce sustainable infrastructure sensitive to place, efficient in the use of natural resources and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible".</p> <p>TAN12: Design (2016) sets out a series of 'Design pointers' including 10 bullet points for environmental sustainability.</p> <p>One of the Wylfa Newydd Project-wide Objectives is to: 'develop a green and sustainable approach in the development and management of the buildings and operational activities' Design and Access Statement Vol. 1 para. 2.3.1 [REP4-016].</p> <p>Explain in the light of these policy objectives and in relation to the following buildings:</p>	

Reference	Respondent:	Location:	IACC RESPONSE	
			<ul style="list-style-type: none">• WNDA development other than the Main Power Station – including the Outage, Administration, Simulator and Training, Gatehouse and Search buildings• Off-Site Power Station Facilities;• Site Campus;• Park and Ride facility at Dalar Hir;• Logistics Centre at Parc Cybi. <p>1) the sustainable technologies that would be applied to the buildings’ design to achieve a low carbon footprint including materials, renewable energy, thermal insulation, natural ventilation to combat solar heat gain, rainwater harvesting; and</p> <p>2) the materials (including natural local materials) to be used for elevations and roofs that will be used to achieve a good aesthetic, visual appearance, scale and relationship to surroundings and context?</p>	
Q2.15.3	Applicant; IACC; WG		<p>In response to FWQ14.0.3(b) the Applicant stated: ‘Horizon’s internal management arrangements will ensure that design of configured structures, systems and components follows a robust multi-disciplinary design review process as the project progresses’. [REP2-375]; however best practice in achieving good design in all the devolved nations emphasises the use of design codes and the value of independent expert external design advice</p> <p>Would there be merit in establishing:</p> <p>1) Design codes that build on the Design and Access Statement; and</p> <p>2) A Design Quality Review Panel (using the auspices of the Design Commission for Wales) to provide advice on design quality and sustainability through the detailed design and construction phases of the project?</p> <p>If so how might these initiatives be secured through the dDCO?</p>	<p>1) IACC would promote the preparation of Design Codes that build on the Design and Access Statement</p> <p>2) IACC encourages the establishment of a Design Quality Review Panel (similar to Design Commission for Wales) to provide advice on design quality and sustainability through the detailed design and construction phases of the project.</p> <p>IACC would welcome these to be included as a commitment in the Design and Access Statements.</p>
16.	Need for the development			
Q2.16.1	The Applicant	Q	<p>1) How would the suspended state affect the delivery of the project?</p> <p>2) If this would result in a delay to the delivery of</p>	<p>3)</p>

Reference	Respondent:	Location:	IACC RESPONSE	
			the project please indicate how long you think this delay might be and how, if the project was to be delayed, the proposal could address the urgent need for energy infrastructure identified in EN-1 and the requirement that the decision maker should give substantial weight to the contribution which projects would make towards satisfying that need when considering applications for development consent under the Planning Act 2008? [EN-1 para. 3.1]?	
17.	Policy Context			
Q2.17.1	IACC	Q	Confirm the status of Wylfa Newydd Supplementary Planning Guidance, May 2018 and whether it is to be submitted into the Examination.	<p>The IACC intended to submit the Wylfa Newydd Supplementary Planning Guidance in to the Examination at Deadline 2 (annex to the First Set of Formal Written Questions). However, due to IT issues in sending the LIR, Written Representations and response to the Formal Written Questions to PINS, this was not received by PINS to enable them to upload this to the Examination Library.</p> <p>The IACC therefore include a copy of the Wylfa Newydd SPG and all accompanying Topic Papers for the Examination Library with this submission. (These have already been provided by e-mail, on 11.02.19 under separate cover).</p> <p>The Wylfa Newydd Supplementary Planning Guidance was formally adopted by the IACC on the 15th May 2018. This replaced the previous New Nuclear Build Supplementary Planning Guidance which as adopted by the IACC in July 2014.</p>
Q2.17.2	Applicant	Q	<p>Respond in general to J Chanay's submission at D4 [REP4-035] and in particular:</p> <ol style="list-style-type: none"> 1) Sections 4.2 to 4.5 in relation to section 105 of PA 2008, NPS EN-1, NPS EN-6, the consultation and government response on new nuclear siting and the Ministerial Statement - referencing case law (as appropriate) on material considerations (and Government policy as a material consideration) and weight. 2) The weight, if any, to be given to the 2008 White Paper on Nuclear Power. 3) Section 4.4 in relation to additional evidence on need for Wylfa Newydd beyond 2025. 4) Section 4.7 in relation to continuing DCO evidence deficit. 5) Section 4.8 in relation to the draft DCO s.106 Agreement. 6) Section 4.9 in relation to Devolved jurisdiction matters and the DCO including the status of the proposed interim nuclear active waste storage facilities. 	

Reference	Respondent:	Location:	Question:	IACC RESPONSE
18.	Waste Management and Radioactive Waste Management			
Q2.18.1	Applicant	All	How should the Waste and Materials Management Strategy (WMMS) and Site Waste Management Plans (SWMPs) be amended to include the adoption and implementation of sustainable waste management practices?	
Q2.18.2	IACC	All	<p>Has the Applicant's explanation of waste matters, provided in section 11 of REP3-004, addressed your concerns as set out in the Local Impact Report on Waste Management [REP2-071]?</p> <p>If not, which of your concerns regarding waste management remain unresolved?</p>	<p>Section 11 of HNPs response to IACC LIR [REP3-004] does not address the IACC's concerns as set out in Chapter 11 Waste Management of IACCs LIR [REP2-071]. Specifically, the following concerns remain outstanding:</p> <p><u>Assessment of the Decommission of the Main Power Station Site</u> In Section 11.1.4 of REP3-004, HNP notes that conventional waste at the decommissioning stage is addressed in Chapter C6 – Waste and Materials Management of the Environmental Statement [APP-093]. However, as noted in paragraph 16.1.5 of document B16 – Waste and Materials Management of the Environmental Statement [APP-081] 'An assessment on the capacities of the receiving waste management facilities to receive waste materials during decommissioning have not been included in the assessment presented in Chapter C6 and would be made at the appropriate time'. This is echoed in paragraph 6.4.27 of chapter C6 - Waste and materials management of the Environmental Statement [APP- 093]. In this context, we remain of the view that the EIA fails to adequately assess the full effects of decommissioning.</p> <p><u>Anticipated Waste Arisings</u> In Section 11.2.3 of REP3-004, HNP indicated how the types and volumes of waste would be managed in accordance with the Horizon Waste Hierarchy and taking account of the availability and capacity of local and regional waste management capacity. They go on to state that this includes reference to silts captured during construction. This remains unclear however, as paragraph 6.5.22 of document C6 – Waste and Materials Management of the Environmental Statement [APP-093] states that whilst silt will be generated by the development of the drainage system, the volume of silt to be generated is not known.</p> <p><u>Baseline Capacity Data</u> Paragraphs 11.2.5 and 11.3.4 to 11.3.5 of REP3-004 provide useful explanation around the rationale and assumptions used in the gathering of baseline waste management capacity data. Whilst it is re-assuring to read that 'worst case' assumptions have been applied when determining whether potential capacity is available, the approach to using environmental permitting data only to establish existing capacities remains flawed and potentially over-representative of the actual capacity available to the development given that permits, unlike planning consents, are issued using a wide banding system rather than specific waste quantities.</p> <p><u>Assessment Methodology</u> The Applicant's approach to assessing the effect that the proposed development will have on the off-site disposal of hazardous and non-hazardous waste, remains the key outstanding point of concern.</p>

Reference	Respondent:	Location:	IACC RESPONSE	
				<p>As reflected in paragraph 1.6.4 and 1.6.5 of IACC’s LIR Chapter 11: Waste [REP2-071], IACC believes that the assessment is fundamentally flawed in respect of the off-site disposal of hazardous and non-hazardous waste – resulting in potentially negative effects possibly being under reported. This is because all other parts of the assessment i.e. that relating to on-site use of waste and materials; off-site composting of waste; off-site anaerobic digestion and in-vessel composting of waste; and off-site reuse and recycling of waste, are all carried out in the context of the capacity within North Wales to accommodate any waste arisings. However, the assessments which relate to the off-site disposal of hazardous and non-hazardous waste have been carried out in the context of North-west England’s ability to absorb waste arisings. This approach is contrary to Welsh planning policy (and the proximity principle, which requires waste to be managed as close as possible to its source of generation); and results in an inconsistent overall waste and materials management assessment, which evaluates one part of the waste stream against local / regional waste management infrastructure and other parts, against a much larger waste infrastructure catchment area (which given its size and inevitable large permitted capacities, will always result in ‘not significant’ effects being reported).</p> <p>Section 11.3.2 to 11.3.3 of REP3-004, explains that there is a lack of both hazardous and non-hazardous waste disposal facilities within the North Wales region. Therefore, it is argued that the widening of the spatial scope of the assessment to include the North-West England is entirely appropriate given the policy criteria set out in Welsh Government Technical Advice Note 21: Waste (TAN 21) for waste to be disposed of at the ‘nearest appropriate installation’.</p> <p>Specifically, paragraph 2.9 of TAN21 states:</p> <p><i>‘The nearest appropriate installation principle states that waste falling with Article 16, should be disposed of or recovered in one of the nearest appropriate installations whilst ensuring a high level of protection for the environment and human health. This means taking into account environmental, economic and social factors, to ensure the right waste management facilities are located in the right place and at the right time. There are several reasons why it is important to manage such waste close to where it arises. This includes reducing the detrimental environmental impacts associated with the transportation of waste and retaining the intrinsic value of waste as a resource in line with the need to secure greater resource efficiency’.</i></p> <p>The latter point of this guidance is important – namely that for this principle of nearest appropriate installation to be successfully delivered there needs to be a network of waste management facilities available. This isn’t the case in the North Wales region in respect of hazardous and non-hazardous waste disposal, which is why the Applicant must look further afield to dispose of these types of waste arising from the project. However, in the context of the EIA, what’s challenged is that the lack of infrastructure in the North Wales region to dispose hazardous and non-hazardous waste, does not make the effect of needing to transport waste much farther afield to North West England an acceptable one.</p>

Reference	Respondent:	Location:	IACC RESPONSE	
				In summary therefore, in respect of the assessment of conventional waste and, the effect that the proposed development will have on the off-site disposal of hazardous and non-hazardous waste , it is considered that agreement with Horizon cannot be reached. This is because IACC is unable to agree (1) the spatial scope of the assessment methodology; and (b) the robustness of the baseline waste arisings and capacity data used in the assessment. As a consequence of this, IACC consider the development's impact on the region's hazardous and non-hazardous waste disposal infrastructure has potentially been under-reported.

APPENDIX A – Compulsory Acquisition Schedule

Obj No. ⁱ	Name/ Organisation	IP/AP Ref No. ⁱⁱ	RR Ref No. ⁱⁱⁱ	WR Ref No. ^{iv}	Other Doc Ref Nov	Interest ^{vi}	Permanent/ Temporary ^{vii}	Plot(s)	CA ^{viii}	Status of objection
1	Ann Tooze	20010302	2			N/A	N/A	N/A	No	Not identified in the Book of Reference.
2	Roger Dobson	20010295	7			Part 2 (Main site)	N/A	N/A	No	Discussions are ongoing with Mr Dobson regarding his property in Tregele.
3	Magnox Ltd	20010387	13			Part 1 - Categories 1 and 2, and Part 3 (Main site)	Permanent Class 1	69, 72, 74, 76, 79, 81, 83, 87, 89	Yes	Discussions with Magnox are ongoing regarding Horizon entering into a LC3 lease to initially carry out the works followed by an agreement to acquire the land from the Nuclear Decommissioning Authority following de-designation of the site.
							Permanent Class 2	71, 73, 80, 82, 88		
							Temporary Class 3	70, 75, 77, 84		
							Permanent Class 4	64, 133, 137		
							Land not subject to powers of acquisition Class 6	78, 86		
4	SP Energy Networks	20010386	14			N/A	N/A	N/A	N/A	Discussions are ongoing to develop necessary protective provisions.
5	Gwawr Jones	20011643	42			N/A	N/A	N/A	N/A	Not identified in the Book of Reference.
6	Davis Meade Property Consultants <i>on behalf of</i> MW, EW	WYLF-AP045	48			Part 1 (Highways 3)	Permanent Class 1	579, 520, 519	Yes	Horizon is in discussions with Messrs Harpers via their agent about entering into a voluntary agreement in respect of their land.
							Permanent	517, 577,		

	& M Harper						Class 2	578, 516, 575		
7	Humphreys Waste Recycling Ltd	20010971	50			N/A	N/A	N/A	N/A	Not identified in the Book of Reference.
8	National Trust	20010995	53			Part 1 Categories 1 and 2, Part 3, Part 5 (Main Site)	Permanent Class 1	63, 65	Yes	Horizon and National Trust have agreed to enter into a voluntary agreement regarding plots 63, 64 and 64 to provide for a private right of access in favour of National Trust that would ensure access across these plots is maintained following compulsory acquisition. Details of this private right of access including the final route are still to be finalised.
							Permanent Class 4	64		
							Land not subject to powers of acquisition Class 6	61		Plot 61 is classified class 6 in the Book of Reference (land that is not subject to powers of acquisition). No works are proposed to be undertaken in this plot, as such Horizon is proposing to exclude plot 61 from the Order Limits at an appropriate time during examination.
9	Coed Cottages	20011089	58			N/A	N/A	N/A	N/A	Not identified in the Book of Reference.
10	Mark Bennet <i>on behalf of</i> residents of Plas Ellen	20011165	63			Part 1 and Part 2 (Highways 3)	Temporary Class 5	572	Yes	This property is identified in Part 1 of the Book of Reference. This Part 1 interest relates to subsoil and as such no voluntary agreement has been sought.
										The property is also identified in Part 2 of the Book of Reference. Horizon has engaged with the residents of this property on this basis and will continue to keep the objector informed throughout the process.

11	SP Energy Networks on behalf of SP Manweb	20011563	80			Part 1 Cat 2, Part 3 (Main Site)	Permanent Class 1	1 2 3 4 5 13 14 15 26 42 43 45 46 47 48 49 50 59 63 65 67 69 74 76 79 81 83 85 87 89 93 94 100 105 116 119 132 142 144 150 152 161 162 164 166 167 174 175 176 181 182	Yes	Discussions are ongoing to develop the necessary protective provisions.
							Permanent Class 2	71 72 73 80 82 88		
							Temporary Class 3	23 70 75 77 84		
							Permanent Class 4	29 30 31 33 34 37 39 40 41 44 64 68 95 96 97 99 103 106 107 108 109 110 111 112 113 114 117 118 122 124 125 127 128 129 130 131 133 134 135 137 138 140 141 146 147 149		
							Temporary Class 5	52 53 54 55 56 143 148 168 169 170 171 172 173		

						Land not subject to powers of acquisition Class 6	78 86		
						Part 1 Cat 2, Part 3 (Parc Cybi)	Permanent Class 1	207 209 210 213	
							Temporary Class 3	203	
							Temporary Class 5	202	
						Part 1 Cat 2, Part 3 (Dalar Hir)	Permanent Class 4	312	
							Temporary Class 5	302 304 305 309	
						Part 1 Cat 2, Part 3 (Highways 5)	Permanent Class 1	601 603 617 638 642 652 655 672 674 675	
							Permanent Class 2	628 640 673	
							Temporary Class 3	602 618 620 622 641 644 645	
							Temporary Class 5	604 606 607 610 632 635 656 657	
							Land not subject to powers of acquisition Class 6	658	
						Part 1 Cat 2, Part 3 (Highways 1)	Permanent Class 1	407 408 411 423 427	
							Permanent Class 2	421	
							Temporary Class 3	409 424 426	
						Part 1 Cat 2, Part 3 (Highways 3)	Permanent Class 1	500 519 527 539 540 551 555 558	
							Permanent Class 2	509 557 559	
							Temporary Class 3	512 526 528 550	

								554 556		
						Highways 7	Permanent Class 1	717 730 731 732 744		
							Temporary Class 3	742		
							Permanent Class 4	723		
							Temporary Class 5	728 729		
						Part 1 Cat 2, Part 3 (Eco Compensation Sites)	Permanent Class 1	800 801 802 811		
							Land not subject to powers of acquisition Class 6	814		
12	The Representative Body of The Church in Wales	WYLF-AP140	81			Part 1 Cat 2, Part 3 (Main Site)	Permanent Class 4	64 135	Yes	Horizon is considering the objector's interest and will engage with them directly to seek to resolve any issues.
						Part 1 Cat 2, Part 3 (Highways 1)	Permanent Class 1	427		
							Temporary Class 3	425 426		
13	Caroline Bateson	20011594	85			N/A	N/A	N/A	N/A	Not identified in the Book of Reference.
14	Addleshaw Goddard LLP <i>on behalf of</i> Network Rail Infrastructure Ltd	20011596	89			Highways 1	Permanent Class 1	407 408	Yes	Discussions are ongoing to develop the necessary voluntary agreement and protective provisions.
							Temporary Class 3	409		
15	Welsh Government	20011597	92			Part 1 Categories 1 and 2, Part 3 (Parc Cybi)	Permanent Class 1	200 207 209 210 211 212 213	Yes	Discussions are ongoing between Horizon and Welsh Government regarding the nature of Welsh Government's interest and rights in land, as detailed in the Crown Land Schedule submitted at Deadline 2.
							Permanent Class 2	201		
							Temporary Class 3	203 204 215		
							Temporary Class 5	202 208 214		
						Part 1 Categories 1 and 2 Part 3 (Dalar Hir)	Permanent Class 1	303 327		
							Permanent Class 4	310 312		
							Temporary Class 5	300 304 306 308 309 322 323 324 326		

						Part 1 Cat 1 (Highways 1)	Temporary Class 5	400 401		
16	Bryngwran Cymunedol Ltd	WYLF- SP004	93			N/A	N/A	N/A	N/A	Not identified in the Book of Reference.
17	Andrew Robert Patience	20011626	98			N/A	N/A	N/A	N/A	Not identified in the Book of Reference.
18	Brian Horsey	20011640	103			N/A	N/A	N/A	N/A	Not identified in the Book of Reference.
19	Dafydd Owen	20011651	106			N/A	N/A	N/A	N/A	Not identified in the Book of Reference.
20	Dr Isabel Hargreaves	20011652	111			N/A	N/A	N/A	N/A	Not identified in the Book of Reference.
21	Dwr Cymru Cyfyngedig	WYLF- AP157	112			Part 1 Categories 1 and 2, Part 3 (Main Site)	Permanent Class 1	1 3 4 13 14 43 59 63 65 67 69 74 76 79 81 83 85 87 89 93 94 105 151 152 153 154 158 159 160 163 165 166 167	Yes	Discussions are ongoing to develop the necessary protective provisions.
							Permanent Class 2	71 72 73 80 82 88		
							Temporary Class 3	70 75 77 84		
							Permanent Class 4	32 33 39 40 64 68 95 96 97 102 107 108 109 110 112 114 118 122 123 124 125 126 133 134 135 137 138 140 141 146 148 149 150 176 179 183 184		
							Temporary Class 5	168 169 170 171 173		

						Land not subject to powers of acquisition Class 6	78 86 90 92		
						Part 1 Cat 2, Part 3 (Parc Cybi)	Permanent Class 1	205 207 209 210 213	
							Temporary Class 3	203	
							Temporary Class 5	202 206 208	
						Part 1 Cat 2, Part 3 (Dalar Hir)	Permanent Class 4	310 312	
							Temporary Class 5	300 301 309 322 324 325 326	
						Part 1 Categories 1 and 2, Part 3 (Highways 5)	Permanent Class 1	603 617 638 652 655 664 665 666 672	
							Temporary Class 5	604 605 607 610 612 613 614 615 630 632 633 635 653 656 660 662 663 677 678 679 680 682	
							Temporary Class 3	621 622 626 627 634 645 654	
							Permanent Class 2	624 668 670 671 676 681	
						Part 1 Cat 2, Part 3 (Highways 1)	Temporary Class 5	400 401 403 413 414 415 416 417 418 437 441 442	
							Permanent Class 1	406 407 410 420 423 427 435	

							Permanent Class 2	419 421 422		
							Temporary Class 3	424 425 434		
						Part 1 Cat 2, Part 3 (Highways 3)	Permanent Class 1	500 527 530 531 352 539 555 566		
							Permanent Class 2	511 557		
							Temporary Class 3	526 543 561 562		
							Temporary Class 5	507 508 538 544 545 546 547 548 549 563 564 570 571 572 573		
						Part 1 Cat 2, Part 3 (Highways 7)	Temporary Class 5	700 711 728		
							Temporary Class 3	701 702 705 707 708 710		
							Permanent Class 1	704 709 730 732		
							Permanent Class 2	706		
							Permanent Class 4	723		
22	Ellen Menai Jones	20011638	113			N/A	N/A	N/A	N/A	Not identified in the Book of Reference.
23	Ieuan Jones	20011664	116			N/A	N/A	N/A	N/A	Not identified in the Book of Reference.
24	Karin White	20011671	117			Part 2 (Main Site)	N/A	N/A	N/A	The objector is identified in the Book of Reference as a Category 3 Persons With Interests In Land (PWIL). Horizon has engaged on this basis and will continue to keep the objector informed throughout the process. Horizon is not seeking any compulsory acquisition powers in respect of any land or interests in land held by this objector.

25	Kevin Barnett	20011675	118			Part 2 (Main Site)	N/A	N/A	N/A	The objector is identified in the Book of Reference as a Category 3 PWIL. Horizon has engaged on this basis and will continue to keep the objector informed throughout the process. Horizon is not seeking any compulsory acquisition powers in respect of any land or interests in land held by this objector.
26	Davis Meade Property Consultants <i>on behalf of</i> Messrs G + I Hughes	20011660	122			Part 1 Cat 1 (Highways 1)	Permanent Class 1	435	Yes	Horizon is in discussions with Messrs Hughes via their agent about entering into a voluntary agreement in respect of their land.
							Temporary Class 3	434		
27	National Grid Electricity Transmission PLC	20011665	123			Part 1 Categories 1 and 2, Part 3 (Main Site)	Permanent Class 1	46 47 63 65 67 69 74 76 79 81 83 85 87 89 93 94 105 144 175 176 181	Yes	Discussions are ongoing to develop the necessary voluntary agreement and protective provisions.
							Permanent Class 2	71 72 73 80 82 88		
							Temporary Class 3	70 75 77 84		
							Permanent Class 4	39 40 41 64 68 94 107 108 109 110 111 130 131 133 134 135 137 138 140 141 146 147 150		
							Temporary Class 5	148		
							Class 6 Land not subject to powers of acquisition	78 86		
28	North Wales Wildlife Trust	20011639	125			N/A	N/A	N/A	No	Not identified in the Book of Reference.
29	Keep It Green	20011682	133			N/A	N/A	N/A	No	Not identified in the Book of Reference.

30	Katie Hayward on behalf of Felin Honeybees Ltd	WPN-002			WPN-002 PD-005	Part 2 (Main Site)	N/A	N/A	N/A	The objector is identified in the Book of Reference as a Category 3 PWIL. Horizon has engaged on this basis and will continue to keep the objector informed throughout the process. Horizon is not seeking any compulsory acquisition powers in respect of any land or interests in land held by this objector.
31	Wendy Vidler	WPN-003			WPN-003 PD-006	Part 2 (Main Site)	N/A	N/A	N/A	The objector is identified in the Book of Reference as a Category 3 PWIL. Horizon has engaged on this basis and will continue to keep the objector informed throughout the process. Horizon is not seeking any compulsory acquisition powers in respect of any land or interests in land held by this objector.
32	Ken Vidler	WPN-004			WPN-004 PD-007	Part 2 (Main Site)	N/A	N/A	N/A	The objector is identified in the Book of Reference as a Category 3 PWIL. Horizon has engaged on this basis and will continue to keep the objector informed throughout the process. Horizon is not seeking any compulsory acquisition powers in respect of any land or interests in land held by this objector.
33	Royal Mail	WYLF-SP067			AS-002	N/A	N/A	N/A	No	Not identified in the Book of Reference.
34	Shan Williams <i>on behalf</i> of Grwp Cynefin	WYLF-OP002			AS-005	Part 2 (Highways 3)	N/A	N/A	N/A	The objector is identified in the Book of Reference as a Category 3 PWIL. Horizon has engaged on this basis and will continue to keep the objector informed throughout the process. Horizon is not seeking any compulsory acquisition powers in respect of any land or interests in land held by this objector.
35	Mr Sayle on behalf of Jobe Developments Limited	WPN-003			REP2-306	Part 1 Categories 1 and 2, Part 3 (Main Site)	Permanent Class 1	58	Yes	As a result of discussions that have taken place to date, no compulsory acquisition rights are now being sought in respect of the freehold of this land.
							Temporary Class 5	52		
							Land not subject to powers of acquisition Class 6	57		

36	Rostons on behalf of Emlyn, Joyce and Huw Roberts t/a R E & J A Roberts	29439016 / WYLF 18-10-18			AS-036			553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571		
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APPENDIX B – Worker Accommodation Question Table

Suggested table in relation to question 2.10.10 asking for a comparison table for what would be delivered by the proposed Temporary Worker Accommodation on site and the consented Land and Lakes scheme at Cae Glas, Kingsland and Penros.

Please feel free to add additional rows to the table to include any other elements of the schemes that are not currently included.

	Onsite Temporary Workers Accommodation	Land and Lakes Scheme
Number of units/workers to be accommodated		
Date when units would be available		
Number of parking spaces proposed		
Indoor sports and recreation facilities proposed onsite		
Indoor sports and recreation facilities proposed offsite		
External sports and recreation facilities proposed onsite		
External sports and recreation facilities proposed offsite		
Health and wellbeing facilities proposed onsite		
Health and wellbeing facilities proposed offsite		
Social facilities proposed onsite		
Social facilities proposed offsite		

Ancillary facilities proposed onsite		
Ancillary facilities proposed offsite		

APPENDIX A

Wylfa Newydd Power Station DCO

Request for Non-material Change No. 3: Shift Patterns – REP4-011

Request for Non-material Change No. 4: Working Hours – REP4-012

Request for Non-material Change No. 5: HGV Movements – REP4-013

IACC responded to Horizon's consultation on these non-material changes on the 6th December 2018. This appendix constitutes IACC's response to Horizon's request for the 'non-material changes' (RfNMC) submitted at Deadline 4 of the DCO examination for Wylfa Newydd. This response has taken into account Horizon's deadline 4 submission and IACC's previous comments submitted to the applicant.

The IACC does not agree that the changes are 'non-material'. The following sections outline the IACC's position as to why these changes are considered to be material and how these changes (individually and cumulatively) will materially change the impacts. .

1. Summary

IACC consider that insufficient information on the impacts of the proposed changes to working hours and shift patterns is provided to allow the IACC to accept the assessments of impacts presented.

IACC objects to the changes to the working hours when considered cumulatively. IACC believes the proposed changes to the working hours constitutes a significant increase in construction activities over a 24-hour period which will have an unacceptable adverse impact on both environmental and human receptors. The proposed working hours conflict with construction times as recommended within British Standard's such as BS6472-2:2008 Guide to evaluation of human exposure to vibration and BS 5228-1:2009 Code of practice for noise and vibration control on construction and open sites. The change to working hours would result in the intensification of works on site which would constitute an unacceptable adverse impact on residential amenity of the local population in terms of noise and vibration.

The 'non-material change No 3: Shift Patterns' notes that Horizon considers that the assessment of impacts is 'comprehensive and accurate'. IACC however disagree and submit that the change to these aspects has the potential to impact, on worker accommodation and housing stock in North Anglesey, which impacts have not been properly assessed. The number of workers working longer shifts is not detailed and the potential risk to their well-being as well as the community is not properly considered.

The IACC does not object to the change to the HGV delivery window provided that this does not take effect unless and until the A5025 offline works are completed and open to traffic and the limits on HGV movements proposed in the change are secured through the DCO.

2. Scope of changes

The IACC notes that the proposed change no.4 on 'working hours' (at paragraph 2.2.3) introduces what appear to be 6 new haul routes. These are: two new circular haul routes (HR-B1 and HR-B2) situated to the west of Tregele in construction zone 9, and one new haul route from construction zone 9 to Mound E (HR-011); a new haul route from the south extent of the deep excavations (construction zones 4 and 8) to construction zone 6 (HR-012); two new haul routes from the south extent of the deep excavations (construction zones 4 and 8) to construction zones 2 and 10 (HR-013), and from the north extent of the deep excavations

(construction zones 4 and 8) to construction zones 2A and 2 (HR-014). Para 2.5.35 states that 'new construction noise modelling and assessment were undertaken to reflect change to working hours and consequential amendments to haul routes.' The IACC notes the submission of detailed noise assessments and revised contour maps as requested by IACC in its consultation response dated 6th December 2018. Following review of the submitted documentation, IACC's objection remains on the basis that the timings conflict with British Standards BS6472-2:2008 Guide to evaluation of human exposure to vibration and BS 5228-1:2009 Code of practice for noise and vibration control on construction and open sites.

In light of the above, IACC considers it inappropriate to introduce new haul routes within this documentation purportedly focusing on working hours.

3. Request for Non-material Change No. 3: Shift Patterns and No. 4: Working Hours

3.1 Transport

The primary basis of the traffic modelling, which has been updated to reflect the shift time changes, remains unchanged from the DCO application. Annual Average Daily Traffic (AADTs) have been adjusted but Annual Average Weekly Traffic (AAWT) flows remain unchanged. Horizon argues (at Paragraphs 2.5.5 and 2.5.6 of the technical) that the traffic flows across Britannia Bridge (and hence bridge crossing journey times) would be slightly greater during the AM peak period (eastbound) when compared to the journey times presented in the DCO Application. Conversely, journey times would decrease during the PM peak period (westbound).

Horizon concludes that the effects on journey time delay across the modelled highway network will be broadly neutral with some sections experiencing minor increases and some experiencing minor decreases in journey times. In terms of shift patterns, Horizon concludes that the proposed change for the day shift will not affect the use of the highway network by the general public and that for the night shift there could be an improvement on the results provided in the DCO application as construction worker traffic flows will shift to periods further from the PM peak hour of general traffic flows.

Horizon also concludes that no new junctions within a 10 minute journey time of the WNDA will exceed capacity relative to the DCO Application Transport Assessment. The Existing Power Station access/A5025 junction (Junction Reference Number 8) exceeds capacity for the revised shift patterns/times as it did for the DCO Application Transport Assessment (see Table 2-4 and Paragraph 2.5.22 of the technical note).

Horizon has since clarified that the Existing Power Station access / A5025 junction is forecast to operate in capacity with the maximum demand being 84% of capacity showing that the junction has some spare capacity (16%) and notes that any delays will occur for construction workers on the minor arm of the junction and hence delays would not be experienced by members of the general public. IACC wishes to point out that delays will still occur and there is no certainty that delays will not be experienced by the general public.

IACC again welcomes the avoidance of worker travel / vehicle movements that coincide with school travel times when pupils are likely to be travelling to school.

In relation to air quality, noise and health Horizon concludes that there would be no new effects and no change to the significance ratings of predicted effects relating to the revised shift patterns and working hours. The same conclusions are reached with respect to potential for and scope of cumulative effects. IACC concludes that these findings are rational given that

they are based largely on the outcome of the updated traffic modelling.

IACC acknowledges Horizon's clarification that the total number of HGV movements within the 06.00-00.00hrs period will remain the same regardless of whether they are distributed between 07.00-19.00hrs, or 07.00-23.00hrs, and therefore Non-Material Change No 5: HGV Delivery Window does not affect the number of HGV movements assumed in Non-Material Change No 3: Worker Shift Pattern.

3.3 Noise, vibration and lighting

IACC withdraws its objection with respect to timings of blasting and welcomes Horizon's commitment to achieving a vibration level of 4.5mm/s PPV outside residences for 95% of blasts during the period 18.00-19.00. IACC acknowledges that this change to blasting limits will be made in the Wylfa Newydd CoCP to be submitted at Deadline 5 (12 February 2019) and brings the proposed change in line with the vibration limits recommended in BS6472-2.

IACC does not accept Horizon's position that the change requested does not generate any new or likely different significant environmental effects due to insufficient detail provided on the lighting impact assessment (i.e. photomontages, updated lighting modelling maps or indicative mapping of lighting positions). IACC therefore is unable to determine whether or not such lighting (particularly on the 6 new haul routes), is acceptable.

IACC acknowledges the additional detail regarding mitigation measures available under the LNMS which is subject to a separate response by IACC.

3.3 Shift length

IACC remains of the opinion that the proposed working hours (10.5 for the day shifts and 10 hours for the night shifts) are long. IACC understand that similar working hours are currently applied for a proportion of the workforce which is currently engaged on the construction of the Hinkley Point C nuclear new build project. In accordance with the Working Time Regulations, workers would have to opt out of the standard requirement which restricts the normal working week to 48 hours.

IACC acknowledge that travel to and from a fixed place of work is not typically included as working time. This issue is considered to be of importance because it may be a key driver for workers to seek the closest accommodation possible to the WNDA in order to minimise their overall travel time to and from work which may be uncompensated in financial terms.

Horizon's own estimate indicates that workers travelling across the Britannia Bridge to and from the WNDA will take approximately 1 hour to traverse across Anglesey before and after their shifts. IACC considers that this is a further reason why workers will choose to take up accommodation as close as possible to the Power Station Site. Anecdotal evidence as well as evidence from the Accommodation Monitoring Reports from the Hinkley Point C project, indicates that the number of workers taking up local accommodation has been substantially higher than predicted. Should this situation occur for the Wylfa Newydd Project there are likely to be adverse effects on the availability of accommodation within Anglesey and adverse effects on existing communities which have not been considered fully by Horizon to date. IACC also has concerns regarding the safety and welfare of individual workers that work long hours and also have significant journey times to and from the WNDA. Driver fatigue could be an issue with respect to the safety of other road users and pedestrians and this does not appear to have been taken into account by Horizon.

IACC considers that Horizon should address the issues identified above and refer to relevant evidence with respect to the behaviours exhibited by the Hinkley Point C workforce as an indication of how the HNP workforce can be expected to respond to the shift patterns and working hours that are proposed.

4. Request for Non-material Change No. 5: HGV Movements

The proposed extension to HGV Movements (Monday to Friday 19:00 - 23:00 and Saturday 08:00 - 13:00) would result in a total of 85 hours per week being available for HGV deliveries instead of the currently proposed total of 60 hours per week as per the DCO application.

IACC identifies a conflict in timings proposed for HGV movements along the A5025 particularly during sensitive periods for residents who are more likely to be at home. IACC believes this is to be an unacceptable impact without adequate measures being in place to ensure impacts are reduced during these times on the road network. IACC requires firmer commitment from Horizon to coordinate HGV movements on both projects in an effort to reduce impacts and secure mitigation for the impacts of this change.

IACC considers that the argument made for the amendments to the shift patterns in terms of 'improving road safety and community impacts' has a direct conflict with the justification for the extended HGV movement hours proposed. This extension of HGV travel movement's results in an additional 5 hours during the evening when levels of lighting will be at their lowest and when residents are resting. In line with other justification for improving safety and community amenity, IACC therefore reiterates its suggestion to increasing the period for HGV movements on a Saturday to be consistent with the weekday times which would result in vehicles travelling in daylight.

IACC recognises that traffic volumes are lower during the evening period (19:00-23:00), however it would note that receptors may be more sensitive to an increase in HGV movements due to the low baseline traffic levels (IACC traffic surveys confirm zero HGV movements occur on certain weekdays during the evening period). Extending the weekday delivery window into the evening will significantly reduce the time-period of zero HGV or bus traffic movements, which will adversely affect the amenity of existing residential properties adjacent to the A5025. IACC does not consider that the proposed changes are acceptable until the A5025 Offline improvements are completed.

IACC welcomes Horizon's commitment to securing the limits provided in the RfNMC HGV Movements in the relevant sub-CoCP.

IACC notes that an additional 18 residential properties shall be 'adversely affected' by the changes proposed.

IACC also acknowledge that Horizon intends to supply the updated ARCADY models and assessment through the SoCG. As such, comments in relation to the impact on A55 Junction 2 will be provided as part of that process.

5. Materiality

IACC notes that Horizon maintain the position that on the basis of the information presented in the submission, it is not anticipated that the proposed change alters the Wylfa Newydd DCO Project to such a degree that it is a materially different project.

As set out in advice note 16, a series of incremental changes can cumulatively amount to a

material change to the application. IACC consider that the proposed changes when taken into consideration together have the potential to materially change the impacts and are cumulatively a Material Change to the DCO Application.

The IACC accepts that the changes proposed do not fundamentally alter the substance of the proposal in the terms of advice note 16. However, IACC considers that these changes will result in a material change to the impacts assessed in the ES and require not only full assessment of the impacts by Horizon, including the provision of other environmental information considering all of the changes together, but also the opportunity for IACC (and others) to consider, assess and respond.

6. Conclusion

IACC consider the proposed changes to the DCO application as being material as they will change the impacts of the project (individually and cumulatively). Contrary to Horizon's assessment of impacts of the proposed changes, IACC believes that the impacts have not been adequately assessed as part of the DCO application process. Given the materiality of these changes, presenting these changes as 'non-material' is unacceptable.

Without prejudice to the IACC's position on materiality, and having regard to the detail set out in this response the IACC:

- objects to the Request for Non-material Change No. 3: Shift Patterns;
- objects to the Request for Non-material Change No. 4: Working Hours; and
- does not object to Request for Non-material Change No. 5: HGV Movements provided that these do not take effect unless and until the A5025 offline highway improvements are completed and open to traffic.

End.