



Ms Kay Sully,
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By e-mail to Wylfa@PINS.gsi.gov.uk

Dear Kay,

Wylfa Newydd DCO Examination EN010007 - Deadline 6 Submissions.

Please find attached the IACC's Deadline 6 Submissions.

Responses are provided in the table below.

Where a response amounts to more than a brief statement, detail provided in the associated Appendices which follow the table.

Issue	IACC Comments
IACC's Comments on Horizon's Response to ExA's Further Written Questions REP5-002	APPENDIX A
Response to actions set in ISH on 7 January 2019 REP5-053	APPENDIX B Appendix 1.1 Safeguarding Appendix 1.2 Langley Park Appendix 1.3 Welsh Language Framework Appendix HNP on the 1 st February 2019 asked IACC, Welsh Government and Gwynedd Council to review and comment on the post-hearing note 'Application of a Welsh Language Skills Competency Framework During Construction and Operation'. HNP confirmed that the note was what HNP believed to be the parties' shared understanding of the Welsh Language 1-5 Framework and how this might be applied during the construction and operation of the Wylfa Newydd DCO project. The IACC provided comments directly to HNP on 6 th February 2019.

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Eich Cyf / Your Ref: EN010007

Dyddiad / Date: 19.2.2019

	Following review of the version submitted by HNP at Deadline 5, IACC confirms that there has been no amendments to the version that we commented on directly to HNP. IACC are therefore submitting the same response as that submitted directly to HNP. Appendix 1.4 Securing Mechanism for Visitor Centre The IACC accept that the permanent visitor centre will not be secured through the DCO. As detailed in the S.106 Agreement, Horizon will submit a Town and Country Planning Application within 3 months of the implementation of the Wylfa Newydd project. If Horizon fail to secure planning permission for the Visitor Centre within 24 months (or the Visitor Centre does not open within 24 months of receiving planning permission), the IACC will be entitled to the Visitor Centre Security (fund) to deliver the Visitor Centre. In response to Action Point 8 arising from the Issue Specific Hearing on the 10th January 2019, the IACC have provided an Information Note on the scope of the proposed Visitor Centre to HNP. A copy of this Information Note is provided in Appendix B.
Responses to actions set in ISH on 8 January 2019 REP5-054	APPENDIX C Appendix 1.1.Engagement with Dafydd Griffiths Appendix 1.2 Securing Contractual Engagements through DCO (Supply Chain) Appendix 1.3 Raw Data on the Existing Traffic Flows and Future HGV Growth on A5025 Appendix 1.4 Transport impacts of early delivery of TWA Appendix 1.5 Early Years Strategy Appendix 1.6 Horizon and WG Position on Issues Relating to HGVs on Britannia Bridge Appendix 1.7 Projects to be considered for Cumulative Effects Appendix 1.8 HGV Tracking on Britannia Bridge

Responses to actions set in ISH on 11 January 2019 REP5-056	APPENDIX D Appendix 1-2 – Reptile Survey Reports Appendix 1-3 Horizon’s Response to Request for Additional Information - Reptile Monitoring Approach Appendix 1-4 Section 7 Habitat Information Appendix 1-7 Clarifications regarding Park and Ride Flood Risk Appendix 1-8 Technical Note on A5025 Flooding (Llanfachraeth) Appendix 1-9 Updated Modelling to Include the Possible Blockage of Culverts within Dalar Hir Appendix 1-10 Supplementary Sewage (Bacteria) Modelling for the Wylfa Newydd Project
Draft Development Consent Order including revision s(and Summary Table of Amendments to the Draft DCO) REP5-003 3.3 Explanatory Memorandum REP5-015 Draft DCO s.106 Agreement dated 23 January 2019 including revisions and overview note REP5-007 Compulsory Acquisition Objection Schedule	APPENDIX E Part 1 - Draft Development Consent Order including revisions (and Summary Table of Amendments to the Draft DCO) Part 2 – Explanatory Memorandum Part 3 – Draft DCO s.106 Agreement dated 23 January 2019 including revisions and overview note Part 4 - Compulsory Acquisition Objection Schedule
8.6 Wylfa Newydd Code of Construction Practice (Revision 3.0) REP5-020 8.7 Main Power Station Site Sub-CoCP (Revision 3.0) REP5-022 8.8 Marine Works Sub-CoCP (Revision 3.0) REP3-024 8.9 Off-Site Power Station Facilities Sub-CoCP (Revision 3.0) REP5-027 8.10 Park & Ride Sub-CoCP (Revision 3.0) REP5-028 8.11 Logistics Centre Sub-CoCP (Revision 3.0) REP5-030	APPENDIX F

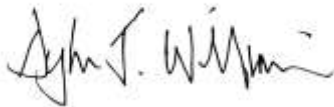
8.12 A5025 Off-Line Highways Sub-CoCP (Revision 3.0) REP-032 8.13 Wylfa Newydd Code of Operational Practice (Revision 3.0) REP5-034	
8.29 Phasing Strategy (Revision 3.0) REP5-039	APPENDIX G As instructed by the Examining Authority at the Issue Specific Hearings, the IACC have been working with Horizon on further developing the Control Documents. The IACC received a draft copy of the Phasing Strategy from HNP on the 23rd January 2019 and provided comments directly to HNP on the 29th January 2019. IACC notes that the version submitted into the examination (Deadline 5) has not yet incorporated IACCs comments. The IACC append a copy of the comments provided directly to HNP and expect them to be taken into account in the next revision. Given the tight timescales for IACC to present comments to HNP as detailed above, these comments were not exhaustive and the IACC reserve the right to make further comments in future. In addition to the comments previously provided, the IACC has the following additional comments. IACC notes the pre delivery restriction on the Logistics Centre at Parc Cybi related to the number of HGV movements which may take place on the A5025. IACC notes that in this and the A5025 off-line highway improvements and the marine off-loading facilities restrictions, the maximum number of additional HGV vehicle movement set is 44 HGV two-way movements per hour, 320 HGV two-way movements per day, and 5000 HGV two-way movements per month . As set out at the issue specific hearing on the 8 January 2019 the IACC considers that an appropriate daily cap for HGV movements prior to the opening of the off-line works is a maximum 40% increase above baseline HGV flows. When considering a HGV baseline of 225 HGVs in the year 2020, a 40% cap would allow approximately 100 additional HGV two-way movements per day. The IACC therefore does not accept the cap proposed by Horizon which will allow an additional 320 HGV two-way movements per day. On the delivery of the site campus, the IACC does not accept that the changes to the phasing strategy address its concerns and maintains its position as set out at deadline 4 REP4-034.

	On the table 2.2 definition of triggers, the IACC does not accept the changes made address its concerns and maintains its previous position. The IACC would also request further clarity and consistency on the timetable for delivering each phase of the project. There are inconsistencies between calendar year and construction years, which makes it impossible to compare timescales and assess impacts. The indicative construction timeline outlined in Figure 2-1 [REP5-039] is not detailed and accurate enough to allow impacts to be appropriately assessed (e.g. Site Campus phasing should be split into three phases). If the Phasing Strategy is to be a Certified Document, it needs considerable more detail on the actual phasing, not just details on thresholds and triggers. IACC acknowledges that the Phasing Strategy now provides clarity regarding the triggers for delivery of the mounds (A-E). The footnote identifies that the 'landscape mounds will continue to change through construction as material is added and taken away'. Aside from the outer face of Noise Mound B, none of the Mounds will have any of the long-term landscape works implemented until towards the end of the reinstatement period, likely to be Year 9. Between the end of the formation of Mounds A, C and E (Q2 Year 3) and this final restoration landscape treatment will be restricted to temporary seeding and Horizon want to have the flexibility to add or take away material from Mounds A, C and E. The IACC has made comments regarding requirements WN9 (1) of the latest dDCO [REP5-003] in its separate Deadline 6 submissions – Appendix E Part.
Landscape and Habitat Management Strategy Part 1 of 2 and Part 2 of 2 (Revision 3.0) REP5-036	SEE APPENDIX H
Workforce Management Strategy (Revision 2.0) REP5-037	APPENDIX I As instructed by the Examining Authority at the Issue Specific Hearings, the IACC have been working with Horizon on developing further the Control Documents. The IACC received a draft copy of the Workforce Management Strategy from HNP on the 01st February 2019 and provided comments directly to HNP on the 06th February 2019. IACC notes that the version submitted into the examination has not incorporated IACCs comments.

	The IACC append a copy of the comments provided directly to HNP and expect them to be taken into account in the next revision. However, given the tight timescales for IACC to present comments to HNP, these comments were not exhaustive and the IACC reserve the right to make further comments in future.
2.4 Rights of Way Plans REP5-012	IACC have not been able to review as these have not been uploaded onto the PINS Website
2.6.1 Wylfa Newydd Development Area - Power Station Site Plans (Part 1 of 2 and Part 2 of 2) (Revision 3.0) REP5-013 and REP5-015	Due to the tight timescales IACC has not had the opportunity to review. The IACC will provide comments at the March ISH if necessary.
2.11 Park and Ride – Dalar Hir Plans Logistics Centre – Parc Cybi Plans	Due to the tight timescales IACC has not had the opportunity to review. The IACC will provide comments at the March ISH if necessary.
Request by ExA at ASI Day 2 (14.02.19) for information regarding the Rhosgoch site	APPENDIX J

Should you require clarification in respect of the above, please do not hesitate to contact me further.

Yours sincerely,



Dylan J. Williams
Head of Service
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APPENDIX A

IACC Comments on Horizon’s Response to ExA’s Further Written Questions

ExA Ref.	Question	Horizon's Response to Question
Q2.1.1	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.	NRWs response remains correct. A permit application for discharge from the Site Campus has not been made, and will not be made during the examination period. Limits and controls will be set by the permit application. Supplementary sewage modelling for has been provided to NRW, and this information is also presented in the note a technical note 'Supplementary sewage (bacteria) modelling for the Wylfa Newydd DCO Project' which has been submitted at Deadline 5 (12 February 2019).
Q2.2.2	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)?	Appendix G9-10 [APP-334] is not a controlled document, so the securing mechanism for the measures described within is through the provisions of the A5025 sub-CoCP, as well as the Wylfa Newydd CoCP, revised versions of these documents having been submitted into Examination at Deadline 5. The proposed mitigation strategies for all relevant receptors, as detailed within Appendix G9- 10, are included within the Wylfa Newydd CoCP and A5025 sub-CoCP. As such, the reference out to Appendix G9-10 is no longer required and has therefore been removed.
Q2.2.3	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.	• Horizon understands that the management of water levels within the Cemlyn Bay Lagoon is one of a number of components of maintaining the resilience of the habitats within the Lagoon and consequently for the species that are present, and which rely on that habitat, particularly for breeding terns during the breeding season. • Water levels in the lagoon are a consequence of several inputs and outputs, fluvial and surface input, movement of water through and over the Esgair Gemlyn shingle ridge, sea level at the mouth of the lagoon and weirs at the mouth. Horizon understands that the land owners and managers (NT and NWWT) manage the water level through use of the weir during the tern nesting season to ensure that the nesting islands remain surrounded by water. Details of the weir are given in National Trust Deadline 4 submission

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		[REP4-038]. Horizon does not know whether this practice has any implications on the quality of the coastal lagoon SAC qualifying feature. - The WNDa is situated within part of the Cemlyn drainage catchment so could have impacts on surface water and fluvial inputs from this catchment. However none of the other inputs or outputs to Cemlyn Lagoon are impacted. Section 7.4 of the Shadow Habitats Regulations Assessment (HRA) [APP-050] presents Horizon's assessment of the impacts on Cemlyn Bay SAC and its habitats and species during construction and operation on the water environment, noting that there would be no adverse significant effects due to: - suspended sediment (Section 7.4.31 and 7.4.61), - changes in chemical content (Section 7.4.52), - changes in salinity due to wave overtopping of the shingle ridge (Section 7.4.59), - thermal and chemical changes as a result of cooling water discharges (Section 7.4.64), - changes in salinity due to changes in surface or groundwater flow (Section 7.4.70), - changes in groundwater inflows affecting water availability (Section 7.4.78 and 7.4.93), - changes in surface water inflows affecting water availability (Section 7.4.89and 7.4.100), - changes in flood risk (Section 7.4.106) As indicated in the Shadow HRA, the conclusions of the assessment are that there would be

ExA Ref.	Question	Horizon's Response to Question	Comment
		no significant adverse effects as a result of the Wylfa Newydd DCO Project on Cemlyn Bay SAC and its habitats and species. Horizon's position is therefore that, notwithstanding the current management of water levels for the benefit of habitats and species associated with Cemlyn Lagoon by third parties, no water level management measures are specifically required to mitigate the impacts of the Wylfa Newydd DCO Project. Regardless of this position, Horizon has held discussions with the North Wales Wildlife Trust, the National Trust and the Royal Society for the Protection of Birds (RSPB) regarding various resilience measures that could be implemented on a voluntary basis that could beneficially contribute to one or more of the components required for maintaining the resilience of the habitats within the Lagoon and consequently for the species; Horizon now proposes to make monies available through the Environment (Cemlyn Lagoon) Fund in the draft DCO s.106 agreement for this purpose.	
Q2.2.4	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?	Horizon can confirm that the working hours set out in paragraph 4.3.2 of the Main Power Station Site sub-CoCP [REP2-032] have been updated at Deadline 5 (February 12th, 2019) to include the site clearance hours of: between 07:00 and 19:00 hours Monday to Friday and between 08:00 and 13:00 hours Saturday	
Q2.2.5	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 assumes?	- Chapter D10 of the DCO ES (landscape and visual) [APP-129] explains that for the purposes of the assessment of landscape and visual effects, it has been assumed that planting mitigation would have reached the following heights by year 15 of operation: - woodland planting: 7m; - scrub: 3m; and - hedgerows: 2m. - The above growth rate assumptions were used for preparation of the photomontage views contained in appendix D10-8 of the DCO ES (photomontage views) [APP-199], which have been used to inform the assessment of landscape and visual effects presented in chapter D10 of the DCO ES [APP-129]. The heights of the planting by year 15 of operation is illustrated based upon an overall broad average. In reality the planting would contain a variety of species, some of which would grow more quickly than others. For example, in woodland planting, pioneer species such as alder (<i>Alnus glutinosa</i>) and silver birch (<i>Betula pendula</i>) would grow more quickly than climax species, such as sessile oak (<i>Quercus petraea</i>). Subtle variations between different species have not been reflected in the photomontages, as the detailed design of the planting has not yet been undertaken. It should, however, be noted that 15 years growth by operation year 15 is a worst-case assumption. This is because, in practice, planting mitigation would be undertaken as early as possible, in the first available planting season following completion of construction in each location. For example, it is proposed to construct part of 'Mound B' and plant the outer face adjoining the A5025 opposite Tregelle early during construction. Therefore, planting opposite Tregelle would have had approximately six years to establish prior to year 1 of operation (the equivalent of approximately 21 years by year 15 of operation). It is acknowledged that parts of the Wylfa Newydd Development Area are subject to exposed micro-climatic conditions, for example, adjoining the shoreline and on elevated ground, and that this could affect growth rates. However, the existing landscape of the Wylfa Newydd Development Area	IACC supports HNP's intentions to design the detailed planting scheme to take account of the variable local climatic conditions across the site, to use tree shelters and wind breaks to aid plant establishment and to install dry-stone walls instead of hedgerows on some of the more exposed parts of the site. As HNP acknowledges, plant growth rates will vary across the WNDA depending on species and the degree of exposure. In IACC's opinion, growth rates will also vary depending on soil quality, the adequacy of physical protection measures (from damage due to other construction activities), the size and age of plant stock (smaller stock usually establishes faster), appropriate and timely maintenance operations and the degree to which the plants have been acclimatised to the local conditions prior to planting. There is also the added complication of biosecurity which means that the range of species that can be planted is becoming increasingly restricted. Hence why, for all these reasons and for biodiversity benefits, IACC strongly recommends that the planting schemes use local provenance plants from seeds collected and grown on the Island. As noted on the site visit (13th February 2019), the community woodland on the western edge of Cemaes was

		demonstrates that woodland planting can successfully establish. This can be seen in the areas of existing woodland, including planting undertaken in conjunction with the Existing Power Station. As data on plant growth rates for directly comparable locations, micro-climatic and ground	planted on the west facing sides of a relatively sheltered valley whereas the WNDA woodlands will be much more exposed to wind and weather and will be planted into newly created/spread soils. Consequently, in IACC's opinion, the growth rates quoted by HNP are optimistic for most parts of the WNDA site. HNP also states that planting will be undertaken as early as possible, in the first available planting season following completion of construction in each location and so will have been planted more than 15 years at year 15 of the operational phase. IACCs review of the Phasing Strategy identified that the slopes of Mound B that face Tregale is the only example where it is intended to provide planting on the Mounds prior to the end of construction. Early planting in other parts of the site, when land becomes available, would be beneficial to speed up the process of screening.
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ExA Ref.	Question	Horizon's Response to Question	Comment
		conditions is not readily available, the growth rates have been informed by growth rates for other parts of the UK, with a more cautious rate adopted to reflect the relatively exposed location on Anglesey. It is noted that, in their full response to the Examining Authority's (ExA's) First Round of Written Questions FWQ7.0.2 in appendix 2B [REP2-157], the IACC observed that the <i>"trees in the community woodland planted on the western edge of Cemaes in 2003 have attained heights of between 5-8m in the 15 years since planting."</i> The assumed woodland planting height used for the assessment in chapter D10 of the ES [APP-129] is therefore within this range. Notwithstanding the assumed growth rates in chapter D10 of the DCO ES [APP-129], the proposed planting shown on the reference point 5 drawing in the Landscape and Habitat Management Strategy [REP2-039] is intended to help integrate the Power Station into the landscape by restoring an appropriate landscape character in keeping with the surrounding landscape. Proposed planting is also intended to soften views of the Power Station in conjunction with the proposed landscape mounding. However, landscape mitigation does not solely rely on any specific heights of planting to screen views and therefore some variation in growth rates across the Wylfa Newydd Development Area would not change the overall effectiveness of mitigation and therefore the findings of the landscape and visual impact assessment in chapter D10 of the DCO ES [APP-129]. The detailed design of planting will need to take micro-climatic conditions into consideration, for example, through species selection and distribution, in accordance with the planting design principles set out in chapter 4 of the Landscape and Habitat Management Strategy [REP2-039], which states: <i>"The local microclimate and soils of the WNDA should be reflected by using species tolerant of the exposed coastal conditions along with plant establishment techniques which have regard to these conditions."</i> and; <i>"...Consideration should be given to ensuring successful plant establishment in the exposed coastal conditions where generally, smaller stock sizes establish more readily..."</i> For example, tree shelters and wind breaks could be considered to aid plant establishment and growth where appropriate. It should also be noted, however, that the exposed,	

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		windswept nature of parts of the site are likely to contribute positively to creating some characteristic wind-sculpted tree and hedgerow forms, characteristic of the coastal location. Another example of how the landscape design could respond to the local climatic conditions, is through the restoration of field boundaries, for which dry-stone walls could be used in preference to hedgerows in more exposed locations; This would reflect the existing tendency in landscape pattern, as shown on figure D10-5 [APP-237].	
Q2.2.6	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 WNCOP [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?	- In Section 10.2.3 of the WNCOP [REP2-037], bullet 3 refers to the use of oil interceptors as a measure to protect the water environment. This is, as noted by the Examining Authority, contained within a section that is focussed on storage areas for fuels and chemicals. - Horizon's strategy to protect water resources is based on the controls set out in the Wylfa Newydd CoCP [REP2-031], relevant sub-CoCPs such as the Main Power Station Site sub-CoCP (REP2-032), and the Wylfa Newydd CoOP [REP2-037]. - As the Examining Authorities question references the WN CoOP, it is assumed that the question relates specifically to the pollution control measures to be implemented during operation of the Power Station. Considering this assumption, it should be noted that the drainage systems proposed for the operation are essentially the same as those installed prior to and utilised during construction. Hence, the following summarises the pollution control measures proposed within the surface water drainage system for both construction and operation and references various control documents accordingly. - Section 10.1 of the WNCOP states that working measures will be implemented to protect the water environment and the measures adopted will be as appropriate from best-practice guidance, including the CIRIA SuDS Manual (C753). Guidance in the CIRIA SuDS Manual provides guidance on the likely hazards associated with various land uses (See Table 26.2 of the CIRIA SuDS Manual) and the pollution	

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		control available from various forms of SuDS system, including the attenuation ponds and swales proposed within the Wylfa Newydd Development Area (See Table 26.3). The use of oil-interceptors and their performance with different contaminants is presented in Table 26.13 of CIRIA C753. • Horizon would also highlight that in Section 10.5 of the WNCOP there is reference to the inspection and maintenance of the drainage system, referring particularly to oil interceptors though also to other infrastructure. This reference to inspection and maintenance is based on the provision of “suitable interception and treatment of surface water runoff from areas that may contain environmental hazards”, which is secured in Section 1.6.101 of the Design and Access Statement – Volume 2 - Power Station Site [APP-408]. • Further to this, it is indicated in the Main Power Station Site sub-CoCP (REP2-032), in Section 10.2.5, that appropriate drainage will be installed prior to Main Construction. The drainage installed at construction, as indicated in Section 8.4.26 of ES Chapter D8 Surface Water and Groundwater [APP-127], will include oil interceptors that would be provided to areas of hardstanding where there is a potential risk from oil/fuel contamination (e.g. at car parking areas), which is consistent with the guidance of CIRIA C753. • Finally, as indicated in Section 8.4.29 of Chapter D8 Surface Water and Groundwater, all discharges to the sea will be subject to qualitative and quantitative control measures set out by an Environmental Permit. The commitment to meet the requirements of the Environmental Permit are set out in Section 10.2.5 of the Main Power Station Site sub-CoCP (REP2-032) and also within Section 2.5 of the WNCOP [REP2-037].	
Q2.2.7	dDCO requirements WN9 and WN11 [REP2-020] require that landscape and habitat schemes for the WND A 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 the operation of Unit 2. Can the Applicant clarify when the schemes would be completed?	• In response to this Question, Horizon has amended Requirements WN9 and WN11 in the updated dDCO submitted at Deadline 5 (Revision 4.0) to clarify the trigger for the completion or implementation of these schemes.	The IACC has made comments on the latest dDCO [REP5-003] in its separate Deadline 6 submissions. In the latest draft DCO: • WN9 (1) – the final landscape and habitat scheme is to be submitted to IACC for approval “Within 24 months of the First Nuclear Concrete”. • First nuclear concrete – is defined as “the date of the first irreversible construction for buildings with nuclear safety significance”. According to the latest Phasing Strategy: • The “date of the first irreversible construction for buildings with nuclear safety significance” – is the “first nuclear construction date” for Unit 1 which is programmed to be end of Q1 in Year 3 (see Table 2-2 and Figure 2-1). Therefore, DCO requirement WN9 (1) now means that the final landscape and habitat scheme will be submitted sometime between end of Q1 in Year 3 and end of Q1 in

			Year 5 (instead of the middle of year 8). This should provide IACC with at least 2 years to work with Horizon and approve the final landscape and habitat scheme in time for the reinstatement of the WNDA (programmed to commence at the end of Q3 in Year 7). The completion of the habitat and landscape works under WN8 and WN9 is not defined and so it is not clear, therefore, when these management and maintenance schemes would be submitted and, therefore, how long IACC would have to approve these schemes. The maintenance of habitats and landscapes should commenced immediately following planting and so sufficient time needs to be provided in order that IACC can approve the maintenance schemes prior to the completion of the planting schemes. In addition, the DCO still needs to have requirements for: • Submission of landscape and habitat schemes for all areas to be planted at an early stage in the Construction Phase, well in advance of the main reinstatement phase, ie boundary enhancements, planting on Mound B and any other advance planting proposed by HNP.
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ExA Ref.	Question	Horizon's Response to Question	Comment
Q2.3.1	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?	This question is a duplicate of ExQ 3.0.1 asked by the Examining Authority within the first written questions. Please see Horizon's response to this question in REP2-375 as the response is still applicable.	

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Q2.3.2	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?	This question is a duplicate of Q3.0.2 asked by the Examining Authority within the first written questions. Please see Horizon's response to this question in REP2-375 as the response is still applicable.
Q2.3.3	Can the Applicant explain how potential storm surges resulting from climate change have been addressed for the protection of the MOLF and Power Station?	This question is a duplicate of FWQ3.0.3 asked by the Examining Authority within the first written questions. Please see Horizon's response to this question in REP2-375 as the response is still applicable.
Q2.3.6	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?	Discussions are ongoing with the landowner to come to a voluntary agreement. The last meeting was held with the landowner and his agent on the 21st January to discuss the flood mitigation. A technical note on potential flood compensation measures based on the illustrative design of the viaduct has been submitted at Deadline 5 (12 February 2019). Horizon will continue negotiations with the landowner and will also re-visit the flood compensatory storage requirements as part of the detail design of the viaduct once a design and build contractor has been appointed.

ExA Ref.	Question	Horizon's Response to Question	Comment
Q2.3.7	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?	- No final design is currently available for flood risk mitigation beyond the preliminary drainage design already presented in APP-167. A final design needs to be developed by, or in consultation with, Horizon's selected contractor and in accordance with relevant DCO control documents, as well as Environmental Permitting requirements, which are yet to be fully determined. - With respect to the preliminary drainage design, Horizon is submitting further information on the design for the WNDA site, which demonstrates that the proposed drainage system provides sufficient restriction and attenuation of runoff up to and including the 1% AEP event with an allowance for climate change such that there would be no increase in runoff for these events from the sites surface water drainage system. As a result, there would be no increase in discharge rates to Cemaes Stream, to the Afon Cafnan and its tributary the Nant Caerdegog Isaf, or to Nant Cemlyn. Consequently, there would be no increase in flood risk to receptors on these watercourses, contrary to the conclusion of the Main Site FCA, in which these issues are identified. - It is consequently Horizon's position is that the existing preliminary drainage design is both adequate and sufficient to demonstrate that the current drainage design will provide the necessary protection against increased flood risk downstream, which is all that the final design would be expected to do in this regard. - A detailed design will be developed when practical to do so and Horizon has committed to the provision of this detailed design for subsequent approval by IACC post-consent.	The question asks why the actual design for flood risk mitigation has not been submitted for the 3 watercourses. Horizon states it is submitting further detail and that it will demonstrate that runoff will be managed to the 1%AEP+CC design event, therefore, contrary to the submitted WNDA FRA, flood risk will not be increased. IACC considers that Horizon's response is still not clear - the problem with the approach initially proposed was to do with changes in catchment area, so whilst runoff rates per unit area (i.e. l/s/ha) may not be increased, if the catchment areas change, because more land drains in a different direction in future, the total volume/peak rate increases. Confirmation is therefore required as to whether catchment areas will not change post-development, or where they do a small amount of extra attenuation will be provided to ensure the larger catchment is controlled to the rates associate with the original smaller catchment.

ExA Ref.	Question	Horizon's Response to Question	Comment
Q2.4.1	CoCP - Ensure that track change copies of the Control Documents and the draft s106 are submitted at Deadline 5.	See the following separate documents provided at Deadline 5: • Wylfa Newydd CoCP (compared with [REP2-031]) • Main Power Station Site sub-CoCP (compared with [REP2-032]) • Marine Works sub-CoCP [REP2-033] • Off-Site Power Station Facilities sub-COCP (compared with [REP2-034]) • Park and Ride sub-CoCP [REP2-035] • A5025 Off-line Highway Improvements sub-CoCP (compared with [REP2-036]) • Logistic Centre sub-CoCP (compared with [REP2-373]) • A revised draft DCO s.106 agreement (compared with [REP3-042]) • An overview note which accompanies the revised draft s.106 agreement	
Q2.4.2	Table 2-3 Volume 8 'Other Documents' of the Guide to the Application Rev.2.0 [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?	The term "outline" was intended to be used within the Guide to mean set out or describe what each control document contained (i.e. the strategies, measures and standards of work to be adopted throughout the construction period for that particular work); it was not intended to mean or suggest that the documents are in any way an "outline" rather than detailed. Horizon will amend Table 2-3 in the Deadline 5 version of the Guide to the Application to update the document descriptions so that they do not refer to "outline". As these documents are not outline, Horizon considers that the associated Requirements are precise, enforceable and effective.	IACC does not agree or accept that the CoCP and sub-COCPs contain enough detail to become approved plans as they currently stand and taking into account the changes made for deadline 5. The description of these as outline is an accurate reflection of their contents. Please see the Council's comments on these codes submitted separately at deadline 6.

ExA Ref.	Question	Horizon's Response to Question	Comment
Q2.4.3	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?	Horizon's position in relation to the amendments sought by IACC, is set out in its oral summary from the second dDCO ISH held 9 January 2019 [REP4-004]. Horizon maintains its position that the erection of temporary buildings should be excluded from the definition of "commencement" as these works are required for site mobilisation (such as housing equipment and materials) and in any event, any temporary buildings erected under (j) are limited by the fact that they must relate to "any of the works listed above" – e.g. those listed within the (a) to (i) of the definition. As set out in the Summary Table of DCO Amendments submitted at Deadline 5, Horizon has made amendments to the definition to remove Work No.12 from the list of exclusions under the definition of "commence" so that the SPC requirements are effective. This is in response to comments from IACC that this definition did not work for the SPC Requirements.	The IACC has made comments on the latest dDCO [REP5-003] in its separate Deadline 6 submissions. The IACC has some concerns with this definition as it is not entirely certain. The interpretation of both 'first' and 'irreversible' construction will to be matters of professional judgement which could create dispute.
Q2.4.4	Article 2 - Maintain Alternative drafting has been proposed by IACC. Do IPs wish to comment? IACC proposal: "maintain" includes inspect, repair, adjust, alter, improve, landscape, preserve, remove, reconstruct, refurbish, or replace any part of the authorised development, provided such works do not give rise to any materially new or materially different environmental effects to those identified in the Environmental Statement, or vary the authorised development as described in Schedule 1 (Authorised development), and any derivative of "maintain" must be construed	As a general comment, Horizon would like to reiterate that the definition of "maintain" is a standard definition in granted DCOs and is necessary to ensure that the NSIP (including the associated development) as granted can be properly maintained by Horizon for the duration of its operation without the need to obtain multiple approvals or amendments to the DCO. In preparing the definition, Horizon took into account the guidance in Advice Note 15, precedent DCOs for NSIPs of similar scale and ensured that sufficient limitations were included to ensure that the scope of works were adequately controlled. In its Deadline 4 submission [REP4-043], IACC provided some proposed amendments to the definition of "maintain", namely: - a restriction of "relaying, extending or enlarging" to works within the WNDA; and - a clarification that where a temporary work is being decommissioned or restored, Horizon cannot undertake any works in respect of it as "maintenance". Restriction to the WNDA The restriction of "relaying, extending and enlarging" to the WNDA ignores the fact that these	The IACC has made comments on the latest dDCO [REP5-003] in its separate Deadline 6 submissions. The IACC notes that there has been no revision to the definition of maintain and it continues to object to the scope of this definition as set out in the Council's previous submissions.

ExA Ref.	Question	Horizon's Response to Question	Comment
	accordingly and subject to the following: For Work Nos [1 and 4] maintain shall also include the relaying, extending or enlarging of any part of those Works; and Where Works are of a temporary nature and decommissioning or restoration of such Works has begun, no works shall be carried out as maintenance which are not required for the purposes of carrying out decommissioning or restoration.	types of maintenance works may be required on associated development sites during their operational period. The example used by Counsel at the second DCO ISH [REP-004] demonstrates this point; there may be a point at which Horizon may need to enlarge or extend structures at the Dalar Hir Site (i.e. bus canopies or the terminal building) because the existing structure is no longer fit for purpose. The only other alternatives under the definition would be to remove and reconstruct the entire structure. In any event, a restriction is not necessary because any extension or enlargement is already restricted by the parameters for that building or structure specified in Schedule 3 of the draft DCO and the fact that such works cannot result in materially new or materially different environmental effects. For example, under Schedule 3 the bus terminal building has maximum parameters of 30mx13mx5m which has been assessed as the worst case. These are the maximum parameters that Horizon would have permission to build out to and so if Horizon built a smaller building (say, 25mx10mx5m) it should have every right to extend it to the full extent of the parameters provided no new effects arose. Maintenance of decommissioned or restored works Horizon also considers that the proposed clarification that any temporary work that has been decommissioned or restored does not have the benefit of "maintenance works" is not necessary. First, it does not acknowledge that some temporary works, such as the Site Campus and Dalar Hir, will be decommissioned in phases. The proposed amendments would therefore prevent maintenance on the occupied accommodation blocks based on the fact that decommissioning works had commenced on other parts of the Site Campus. Secondly, there is no reason for this limitation as where works are to be decommissioning in their entirety, such as the Logistics Centre, the works will no longer be in operation and therefore do not need to be maintained	

ExA Ref.	Question	Horizon's Response to Question	Comment
Q2.4.5	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)?	As noted in Horizon's response to IACC's Written Representation [REP3-019] and its oral submissions from the second dDCO ISH [REP4-004], section 158 of the Planning Act 2008 provides a defence of statutory authority in proceedings for nuisance if a person carries out development for which consent is granted by an order granting development consent. Horizon has voluntarily chosen to limit this wide defence by providing that it will only have a defence against nuisance claims relating to noise and vibration, dust/air quality and lighting where it is acting in accordance with: • A s60 CoPA notice or s61 CoPA consent; • the measures in the Wylfa Newydd CoCP and sub-CoCPs; and • An Environmental Permit (relating to operation). The Wylfa Newydd CoCP and sub-CoCPs contain a number of detailed controls relating to dust and air quality (WN CoCP section 7.3), lighting (WN CoCP section 4.5) and noise and vibration (WN CoCP section 8; although these measures require CoPA applications). For example, the dust and air quality strategy in the Wylfa Newydd DCO contains 5 pages of construction and monitoring measures that Horizon must implement during construction and thresholds that must not be exceeded (section 7). These measures are sufficiently detailed to provide measures by which Horizon can demonstrate it is acting in accordance with and therefore has the benefit of the defence. If any of the stakeholders have specific concerns over the detail within these sections of the Wylfa Newydd CoCP or sub-CoCPs then Horizon would appreciate proposed amendments as to date Horizon has had no substantive feedback on the detail of these documents from any of the stakeholders, only general comments that they lack detail.	The IACC maintains the position set out in its answer to this question [Rep5-057] that the level of detail in the CoCPs is entirely inadequate to justify allowing this novel defence to be created.
Q2.4.6	Article 27	An amendment to article 29 is not necessary as:	IACC notes the deletion of sub section 6 of article 27 at deadline 5 [REP5-003] which created a right to compensation for the loss of private rights or imposition of restrictive covenants. The IACC submits that the deletion is contradictory to the answer given to this questions which asserts that article 27 provides for compensation. Subsection 6 should be reinstated

ExA Ref.	Question	Horizon's Response to Question	Comment
	For clarity, should Article 29 be amended to make clear that compensation is available for CA of private rights?	- Article 27 is already subject to the compensation regime under the 1961 Act; and - Article 29 deals with private rights, not compulsory acquisition of rights which is a different issue. Article 27 and Schedule 12 (Modification of Compensation and Compulsory Purchase Enactments for Creation of New Rights and Restrictive Covenants) of the draft DCO modifies the compensation provisions under the 1961 Act so that they apply to the compulsory acquisition of a right by the creation of a new right or the imposition of a restrictive covenant. As the ExA will be aware, section 125 of the Planning Act 2008 applies the compensation scheme under the 1961 Act to acquisition of land pursuant to a DCO and so, article 27 and Schedule 12 extends that scheme to the compulsory acquisition of rights. In comparison to article 27, article 29 deals with the instance where by the exercise of compulsory acquisition powers under article 25 or article 27 or where Horizon takes possession under articles 35 and 36, a private right is suspended or extinguished As article 27 already provides compensation, article 29 does not need to be amended.	
Q2.4.7	Article 29 Should the following works underlined be added to Article 29 (4) (4) Any person who suffers loss.... under this article and article 27 is entitled to compensation....	See response to Q2.4.6 above.	

ExA Ref.	Question	Horizon’s Response to Question
Q2.4.9	Article 74 Given the submissions at D4 by the Applicant and IACC, does either party wish to comment further in respect of this Article?	Horizon's position in relation to article is set out in its oral summary from the second DCO ISH held 9 January 2019 [REP4-004] and response to FWQ4.0.49 [REP2-375].
Q2.4.10	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 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	Horizon has considered Welsh Government's representations regarding Welsh Government's land interests and now agrees that land belonging to the Welsh Ministers, the National Assembly of Wales, or which forms part of the strategic highway for which Welsh Government is the Strategic Highway Authority constitutes Crown Land for the purposes of section 135 of the Planning Act 2008. Given this, a number of minor changes are required to the interests that Horizon is seeking in respect of Welsh Government land. Horizon wrote to Welsh Government on 31 January 2019 explaining these changes and to formally request the Welsh Government's consent to the inclusion of provisions providing for compulsory acquisition of interests in the Welsh Government land and provisions applying in relation to Welsh Government land in the DCO. Horizon is hopeful that this matter can be resolved in advance of the compulsory acquisition hearings in March. Simultaneously, Horizon has updated the Book of Reference and the Lands Plans further, to incorporate the changes mentioned above. These revised documents are being submitted to the Examination at Deadline 6. Horizon has also updated the Crown Land Schedule which was first submitted at Deadline 2; this update is also being submitted at Deadline 5.

ExA Ref.	Question	Horizon's Response to Question
	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...." 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	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? 3) Are there any environmental/traffic impact issues?	The allocation of car parking during the operational phase of the Wylfa Newydd DCO Project was in Horizon's response to First Written Question 11.1.2. This response identified a typographic error in the Planning Statement concerning the provision of car parking at the Power Station Site during the operational phase. Horizon considers that there are no other planning/environmental/traffic implications arising from the correction of this error.

ExA Ref.	Question	Horizon’s Response to Question
Q2.4.12	PW2 – Wylfa Newydd CoCP Many IPs have raised concerns that should the detail of the CoCP not be agreed prior to the end of examination, then 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. (1) Could this approach create the possibility of an uncertain scheme which hasn’t been properly assessed? (2) Would this approach to requirements be lawful, given Rochdale principles, and is reasonably intended to fix ‘finalised aspects’ at a later date? In responding to this question, attention is drawn to paras 103 and 104 of pre-application guidance.	We assume the intended reference is Requirement PW7 which relates to the Wylfa Newydd CoCP. Requirement PW2 relates to the Phasing Strategy. 1. The Wylfa Newydd CoCP , the sub CoCPs and the Wylfa Newydd CoOP all relate to how the authorised development will be constructed and operated. They reflect the mitigation identified in the environmental and other assessments. As such there is no uncertainty in the assessment. The discussion with IPs has been around whether the controls and mitigation set out in the documents are detailed enough. Whilst overall Horizon believes the documents contain sufficient detail, it has sought to agree further detail with IPs and is submitting updated CoCPs at Deadline 5. In addition, for certain discrete areas, Horizon agrees with the IPs that further detail may be appropriate. Horizon has therefore proposed a mechanism for approval of further detail of these discrete areas. The CoCPs will set out the principles/parameters and provide for a scheme to be submitted post DCO grant. (E.g a traffic incident management scheme) . Such scheme is to be in accordance with the principles/parameters set out in the CoCP. The obligation to submit and have these schemes approved is set out in new and amended Requirements in the draft DCO being submitted at Deadline 5 (for further detail see Horizon's response to Q2.4.13). The practice of setting out principles/parameters and providing further detail is well established in planning law and has been adopted in many DCOs. It is little different to submitting further design details for post grant approval in accordance with the principles set out in the Design & Access Statement. 2. The Rochdale envelope approach is established in UK planning case law and recognised as applicable to DCOs in PINS Advice Note 9. It involves broadly defining a project (or elements of it) but limiting it by a number of clearly defined fixed parameters, for example, minimum and maximum heights of structures or numbers of turbines. Use of the Rochdale envelope in defining a project and assessing its effects is endorsed in the Overarching National Policy Statement for Energy (EN-1), PINS Advice Note 9, and the DCLG Guidance on pre-application processes. Use of the Rochdale envelope does not remove the onus on an applicant to provide as much detail as possible about the proposed development in its application. The PINS Advice Note

ExA Ref.	Question	Horizon’s Response to Question
		9 stresses that any flexibility within the description of a project must still provide a sufficient level of detail so that the decision-maker is able to satisfy itself that, given the nature of the project, they have full knowledge of the likely significant effects on the environment. As Horizon's application has been advanced on a parameters/Rochdale envelope, the Environmental Statement has assessed the worst case in terms of the environmental effects that could arise from the Project based on the minimum and maximum parameters set out under Schedule 3 of the dDCO. The Wylfa Newydd CoCP and the sub-CoCPs (along with other control documents) secure the mitigation that has been identified in the ES as necessary to avoid or mitigate the significant environmental effects of the Project. Therefore, the control documents in their current form do not create a situation where there is any risk or suggestion that the Project has not been adequately assessed.
Q2.4.13	PW2 – Wylfa Newydd CoCP 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.	Horizon considers that the Wylfa Newydd CoCP and sub-CoCPs provide enough detail that they can be approved through the DCO and vehemently disagrees with the suggestion that this document is effectively an outline CoCP. As set out in our response to Q2.4.12 Horizon acknowledges that there are discrete topics within the CoCP (i.e. lighting, traffic incident or AIL management) that do require further detail. However that does not mean that the entire document (which includes a large number of agreed measures) should be treated as outline and subject to subsequent approvals. Horizon has proposed an amendment to Requirement PW7 to allow the detailed parts to be approved through the DCO, with further details being required under post-grant schemes. This approach to the CoCPs and schemes has been replicated within the site-specific requirements. The amendments to Requirement PW7 are set out in the draft DCO submitted at Deadline 5 (Revision 4.0) and explained in the accompanying Summary Table of Amendments.

ExA Ref.	Question	Horizon's Response to Question
Q2.4.14	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 A14 Cambridge to Huntingdon Improvement Scheme Development Consent Order as per text below: Register of requirements 22.— (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. (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.(3) The register must be maintained by the undertaker for a period of 3 years following completion of the authorised development.	Horizon does not consider that the proposed requirement is necessary or appropriate. It is not appropriate for a private body to have to maintain a register when the local authority already has a system in place to track applications and approvals. Horizon notes that a requirement like the one suggested by the ExA has only been imposed in highway NSIPs and likely because Highways England (which is typically the discharging authority in those DCOs) does not have a public register of applications. In those instances, Horizon agrees that it may be appropriate to impose this requirement on the applicant; however, that is not the case in this DCO. Horizon notes that for the Hinkley Nuclear Power Station (among other NSIPs), both the Sedgemoor District Council and the West Somerset Council maintain DCO Project Pages where the community can view all discharge applications and decisions as well as other Project documents such as the section 106 agreement and details of advisory groups: • https://www.sedgemoor.gov.uk/hpcplanning • https://www.westsomersetonline.gov.uk/Planning---Building/Planning/Hinkley-Point There is no reason why IACC should not take this same approach, rather than putting the onus on a private body who would be reliant on IACC providing the relevant inputs (which if it failed to do, Horizon could be held to be in breach of the requirement).

ExA Ref.	Question	Horizon’s Response to Question
Q2.4.15	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. Does the Applicant wish to comment?	The concerns raised by NWP demonstrate a fundamental misunderstanding of the scope and purpose of the Phasing Strategy – it is to demonstrate when Horizon will be delivering the key mitigation (defined as Park and Ride facility, Logistics Centre, A5025 Off-Line Highway Improvements, Marine Off-Loading Facility, Ecological Compensation Sites, Site Campus, landscape mounds within the WNDA) needed to address the impacts of the Project; not the delivery of the Power Station itself. The timing for the delivery of the Power Station itself, is set out within the Environmental Statement as well as the Construction Method Statement (CMS) [APP-136] – see section 2.3. Horizon notes that it already has a requirement to comply with the CMS (PW3) and so no additional requirement is necessary.
Q2.4.17	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. The Applicants position is that this would be prepared in accordance with the Workforce Management Strategy which would be a	(1) The concerns of Interested Parties around the proposal that Horizon is only providing the Code of Conduct for information and not approval stems from a misunderstanding of the CoC. Workforce behaviour will largely be governed through the terms of employment under which the workforce is engaged to work on the Project, which will be based on appropriate industry standard agreements (such as the National Agreement for the Engineering and Construction Industry (NAECI 2015) and the Construction Industry Joint Council (CIJC) Working Rule Agreement). Alongside this, the workforce will be required to sign a CoC, which Horizon will develop and agree with its supply chain and trade unions. It is important to note that this means that there will not be a single CoC that can be approved by stakeholders; there is likely to be multiple of iterations of CoCs for each individual contractor and subcontractor. It is therefore impossible (and would result in substantive delays for the Project) for the discharging authority to approve each and every single CoC. Therefore, the focus on Interested Parties during this Examination should be on ensuring that they are satisfied with the principles within the WMS as these will set the key parameters to guide and control workforce behaviour. Horizon has received comments on the WMS from Interested Parties and will submit any additional amendments as a result of those comments

ExA Ref.	Question	Horizon’s Response to Question
	certified doc. (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?	into Examination at a later deadline. In response to concerns from Interested Parties that Horizon would use the revision procedures under Requirement PW8 to address non-compliances, Horizon has amended Requirement PW8 to expressly provide that Horizon must ensure that construction of the authorised development is undertaken in accordance with the WMS, and that if it wants to revise any principle within the WMS during construction, then it must seek approvals from IACC, in consultation with North Wales Police. This amendment has been included in the Deadline 5 update to the draft DCO (Revision 4.0). (2) Additional amendments to PW8 to provide for approval, monitoring and enforcement of the CoC is not considered necessary for the following reasons: - As noted above, Requirement PW8(1) has been updated to expressly provide that Horizon must ensure that construction is undertaken in accordance with the WMS. This will ensure that compliance with the WMS principles throughout the duration of construction and require Horizon to ensure that contractors sign up to a CoC flows through their contractual obligations. - The WMS sets out monitoring and enforcement measures that must be followed and so, the requirement to comply with the WMS will mean that these measures must be implemented (PW8(1)). - All Wylfa Newydd CoC(s) must be prepared in accordance with the WMS (PW8(3)) and implemented during construction. As the undertaker, it is Horizon's responsibility to ensure that the CoCs are prepared in accordance with the WMS and implemented by contractors during construction otherwise it will be in breach of PW8. - As all Wylfa Newydd CoC(s) must be provided to IACC for information, IACC will be able to monitor that CoCs are in accordance with the WMS (PW8(3)).

ExA Ref.	Question	Horizon’s Response to Question
Q2.4.18	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. Would the Applicant set out what its intention is and whether five working days as proposed would be appropriate?	In its Written Representation [REP2-218], IACC noted that the longstop wording in PW9(1) of "in any event within one month after the occurrence of those dates" reduced the certainty and enforceability of the requirement. No comments were made in respect of Requirement PW9(2). In its Deadline 3 response [REP3-019], Horizon noted that the full deletion of this longstop wording in PW9(1) was made in error and, as part of the Deadline 5 update to the draft DCO, Horizon has amended that paragraph to provide that it "must notify IACC of the Unit 1 Commissioning Date and Unit 2 Commissioning Date and operational period of each Unit as soon as reasonably practicable and in any event within 5 working days after the occurrence of those dates."
Q2.4.19	PW11 – Community Safety Management Strategy (CSMS) 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. An alternative approach would be that IACC approves the document in consultation with NWP. (1) Would IACC and NWP resist this proposal? (2) Should the CSMS be included as a Certified document under Schedule 18?	As part of its Deadline 5 updates, Horizon has deleted Requirement PW11 and inserted the requirement for a Community Safety Management Strategy (now Scheme) that must be approved by IACC, in consultation with NWP, as part of Requirement PW7.. In addition to this, Horizon also notes that under the Wylfa Newydd CoCP, NWP is part of the Emergency Services Engagement Group which has the role in agreeing the detailed CSMS with horizon prior to it being submitted to IACC for approval in accordance with PW7. Horizon does not consider that the CSMS should be a certified document; as it will not be prepared or approved until after the grant of the DCO and so cannot be part of the list of certified documents in Schedule 18.

ExA Ref.	Question	Horizon’s Response to Question
Q2.4.20	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. NWP request the inclusion of a new Article which would define the structure, governance and role of the WNMPOP (if it is to apply and exist). It refers to Article 66 of the Silvertown Tunnel made Order as providing precedent for this approach. (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?	(1) Horizon is not proposing amendments to the draft DCO to establish an 'allocation body'. Instead the revised draft s.106 has restructured the governance proposals to remove the Wylfa Newydd Major Permissions Oversight Panel ("WNMPOP"); This has been achieved by: Avoiding the use of contingency funds where that was considered acceptable. Where contingency funds remain, providing direct triggers for release so there is no discretion as to release - thus negating the need for an "independent" body recommending release. Further detail on the revised governance proposals are set out in the document submitted by Horizon at deadline 5 called "SWQ 2.4.1 and overview of amendments made to the draft revised draft s.106 agreement of 23 January 2019" (2) No longer relevant.

ExA Ref.	Question	Horizon's Response to Question
Q2.4.21	Given section 120(2) (b) PA2008 what are your comments in respect of Appendix 2 of REP4-043?	In Appendix 2 of the NWP's Deadline 4 (17 January 2019) submission [REP4-043], NWP sets out all the documents that it is seeking to have an approval role over. Horizon acknowledges that section 120(2)(b) states that a requirement can include the need to obtain approval from "any other person"; however, Horizon considers that this should be the discharging authority – given that they are subject to the timeframes and processes under Schedule 19 of the draft DCO. Horizon has, however, provided consultation rights in respect of the following schemes to NWP given these fall within their statutory functions: • Traffic Incident Management Scheme (PW7); • Abnormal Indivisible Loads Management Scheme (WN1); • Community Safety Management Scheme (noting that NWP also has a right to agree the detail of this scheme under the Wylfa Newydd CoCP prior to the formal submission under PW7); • Protest Management Scheme (WN1) (noting that the Wylfa Newydd CoCP has been updated to provide that Horizon will agree a protest management strategy with NWP prior to the formal submission of the scheme under WN1);Revisions to the WMS (PW8); Horizon also notes that as outlined in Schedule 19(3) of the updated draft DCO (Revision 4.0) makes it clear that the discharging authority has the right to consult any statutory body it considers relevant in the discharge of any approval under the DCO and so there is nothing to stop IACC consulting with NWP on other documents such as revisions of the Wylfa Newdydd CoCP or the sub-CoCPs. As noted in the draft SoCG submitted at Deadline 5 (12 February 2019), NWP has agreed that: • It will no longer seek a Site Security Plan for its approval provided Horizon amends the Wylfa Newydd CoCP to outline security measures. These

ExA Ref.	Question	Horizon's Response to Question
		amendments have been included in the updated CoCP submitted at Deadline 5 (12 February 2019). It will no longer seek a MOLF operational plan for its approval given that operation of the MOLF will be subject to a full Port Management Safety Plan (outside the control of the DCO regime). Horizon has agreed to provide NWP with sufficient information at the appropriate time to enable it to understand impacts of the construction and operation of the MOLF on its services.
Q2.4.22	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]. What is the Applicants view?	The version of the Wylfa Newydd Code of Construction Practice submitted at Deadline 5 (12 February 2019), includes all the requirements that are normally found in a Construction Traffic Management Plan. This means that a further construction Traffic Management Plan is not considered necessary to control the construction traffic of the Wylfa Newydd DCO Project. As noted in Horizon's response to Network Rail's written representation submitted at Deadline 3 (18 December 2018) [REP3-031], the Wylfa Newydd DCO Project will not impede access to land controlled by Network Rail.
Q2.4.23	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?	The level crossing at Valley is on the B4545 and this road provides access to the southern part of Holy Island. Changes in traffic flows on the B4545 associated with the Wylfa Newydd DCO Project have not been assessed as part of the DCO Transport Assessment because it is not envisaged that any construction worker-related traffic would use this route (see Appendix C2-3 – Traffic Flows). In addition, the B4545 does not form part of the agreed construction routes for construction delivery vehicles. In practice, a small proportion of Wylfa Newydd DCO Project construction worker-related traffic could potentially travel on this route. These traffic flows are expected to be very low given the low number of construction workers that are expected to live on the southern part of Holy Island and hence would need to use the B4545 to access the Wylfa Newydd

ExA Ref.	Question	Horizon's Response to Question
		Development Area and other work sites. If sufficient demand arises from construction workers, a shuttle bus service could operate along the B4545 corridor as shown in Figure 5-5 of the DCO Transport Assessment [APP- 101] to reduce the number of cars associated with the Wylfa Newydd DCO Project travelling on the B4545. It should also be noted that there is a low frequency of rail services operating on the railway line through Valley at present (typically 1-2 passenger trains per hour total (two-way)). This means that the impacts of any traffic arising from the Wylfa Newydd DCO Project on the operation of the level crossing are considered to be very low.
Q2.4.24	Site Preparation and Clearance Works – Work No 12 Should SPC be in full in the title of this section?	• In response to comments at Deadline 4 from Welsh Government [REP4-053], Horizon has amended the definitions of SPC Works in the DCO to avoid confusion between Work No.12 and the site preparation works under the TCPA permission. For this reason, the title in this section of Schedule 2 has been retained as is as it does not refer to a defined term.
Q2.4.25	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.	As noted in the Deadline 2 Submission - Summary table of amendments to the draft DCO (Revision 3.0) at Deadline 2 [REP2-004], Horizon had removed Requirement SPC5 on the basis that this control would be inserted into the updated Main Power Station Site sub-CoCP to be submitted at Deadline 5. This amendment aligned with Horizon's approach that it should avoid duplication between the control documents and the Requirements. Requirement SPC5 [REP1-005] provided: SPC5 Terns The SPC Works may not be undertaken on land to the west of Afon Cafnan as identified on drawing [*] during the [*] tern breeding period [*]. In the Deadline 5 update of the Main Power Station Site sub-CoCP, section 11.4.1 provides

ExA Ref.	Question	Horizon’s Response to Question
		that: Works associated with Works No.12 in the draft DCO [REP2-021] may not be undertaken on land to the west of Afon Cafnan and bound by the Order limits during the period 7th March – 15th August unless otherwise agreed with IACC in consultation with NRW. As submission of the updated control documents was delayed from Deadline 4 to Deadline 5 following the Issue Specific Hearings, Horizon acknowledges that the ExA would not have seen the amended text to provide for the control to be secured through the Main Power Station Site, rather than in a bespoke requirement.

ExA Ref.	Question	Horizon's Response to Question	
Q2.4.26	SPC10 Drainage Scheme Provide detail of the drafting of the new drainage requirement proposed at REP2- 004.	The new drainage requirement that Horizon referred to in its Deadline 2 DCO amendments [REP2-004] has been included within its Deadline 5 update of the draft DCO as Requirements WN1 and WN[A]. Horizon has proposed that it will submit an Overarching Construction Drainage Scheme for approval prior to construction on the WNDA, and then will submit detailed phased drainage plans in accordance with the Overarching scheme (WNA). The reason for taking this staged approach is that construction drainage will evolve during the course of construction and so Horizon will need to submit a number of phased plans to deal with different parts of the sites or construction phases. The key control on these subsequent phased plans is that they must be in accordance with the Overarching scheme that is approved by the discharging authority (in this requirement, IACC in consultation with NRW) and with the principles in the CoCPs and any Environmental Permits relating to drainage.	The new drainage requirement that Horizon referred to in its Deadline 2 DCO amendments [REP2-004] has been included within its Deadline 5 update of the draft DCO [REP5-003] as Requirements WN1 and WN[A]. Horizon has proposed that it will submit an Overarching Construction Drainage Scheme for approval prior to construction on the WNDA, and then will submit detailed phased drainage plans in accordance with the Overarching scheme (WNA). The reason for taking this staged approach is that construction drainage will evolve during the course of construction and so Horizon will need to submit a number of phased plans to deal with different parts of the sites or construction phases. The key control on these subsequent phased plans is that they must be in accordance with the Overarching scheme that is approved by the discharging authority (in this requirement, IACC in consultation with NRW) and with the principles in the CoCPs and any Environmental Permits relating to drainage. With regard to the phased construction drainage plan, the IACC welcomes the inclusion of the new requirement however considers that it should be noted in this requirement that the standard to be achieved in relation to flooding should be set out in the body of this requirement. As set out in the IACC summary of submissions in Issue Specific Hearing 2. Biodiversity. 11th January, 2019 [REP4-034] the IACC considers the appropriate level to be achieved to be that there should be no increase in flood risk on any property including the third party property currently at risk. . The provision of an overarching strategy with approval by IACC and NRW is appropriate. However, the subsequent Phased plans submitted under WN[A] are only provided to IACC and NRW for information. IACC request that that the requirement is amended such that the Phasing plans also require to be approved.
Q2.4.27	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].	In response to the ExA's FWQ4.0.65, both IACC [REP2-153] and Horizon [Rep2-375] confirmed that an 8 meters set back for access is sufficient to allow access to the main site. This was also considered appropriate in the context of the site preparation permission conditions (which is what SPC12 has been modelled on).	

	Are discussions now concluded between the two parties and has agreement been reached? If so, please signpost where in the documentation.		
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ExA Ref.	Question	Horizon's Response to Question	
Q2.4.28	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?	Where building heights are pertinent to the environmental assessment they are included in the parameter table WN4A. It is the maximum parameters that create the greatest environmental impacts and which Horizon is seeking to control through the parameters in Schedule 3 of the draft DCO. If there is no minimum stated then Horizon objects to the imposition of a minimum height as this is not necessary and would restrict future value engineering opportunities.	The IACC continues to be concerned that the temporary workers' blocks could be constructed in a manner where the full benefits are not achieved but the impacts, on particular on the SSSI are incurred. By constructing accommodation blocks which do not include the proposed number of storeys and therefore bedspaces, the full footprint impact attributable to their construction is incurred without achieving the benefits. The IACC considers that this could be addressed through controls on the TWA should the Examining Authority consider that to be more appropriate, such as requiring a minimum number of bedspaces per block for the first phases which would in practice mandate a minimum number of storeys.

ExA Ref.	Question	Horizon's Response to Question	
Q2.4.29	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. (2) How would the CoOP be monitored and enforced?	Horizon considers that the Wylfa Newydd CoOP provide enough detail that it can be approved through the DCO and vehemently disagrees with the suggestion that this document is effectively an outline CoOP. Horizon also notes that, in addition to the Wylfa Newydd CoOP, it will also have other regulatory obligations in relation to the operation of the nuclear power station that will be managed, monitored and enforced outside the DCO regime (such as the Nuclear Site Licence and operational Environmental Permits). While Horizon acknowledges that there are discrete topics within the CoOP (i.e. traffic management) that do require further detail, that does not mean that the entire document (which includes a large number of agreed measures) should be treated as outline and subject to subsequent approvals. Horizon has therefore proposed an amendment to Requirement WN10 to allow the detailed parts to be approved through the DCO, with further details being required under post-grant schemes. This approach to the CoCPs and schemes has been replicated within the site- specific requirements. The amendment would be as follows: WN10 Wylfa Newydd Code of Operational Practice <u>and Schemes</u> <u>(1)</u> The operation and maintenance of the Power Station Works must be carried out in accordance with the Wylfa Newydd CoOP, unless otherwise approved by IACC (2) Prior to commencement of any part of the authorised development the Operational Travel Scheme must be submitted to and approved by the discharging authority identified in Schedule 4 (Control documents and schemes). (3) The scheme submitted under paragraph (2) must be in accordance with principles, measures and strategies contained in the relevant part of the Wylfa Newydd CoOP	The IACC does not agree that the CoOP contains the necessary detail to perform its function and to be enforceable. The selection of discrete elements could be subject to later approval is inappropriate given that the criticisms apply to the code as a whole.

ExA Ref.	Question	Horizon’s Response to Question							
Q2.4.30	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?	and any other details identified in Part 2 of Schedule 4. (4) Operation of the authorised development may not commence until the scheme submitted under paragraph (2) has been approved by the discharging authority, in consultation with the relevant consultee identified for that scheme in Part 2 of Schedule 4. (5) Operation of the authorised development must be in accordance with the scheme approved under sub-paragraph (4), unless otherwise agreed by IACC, in consultation with the consultee identified for that scheme in Part 2 of Schedule 4. Schedule 4 (Control documents and schemes) [...] <table><tr><th>Scheme</th><th>Wylfa Newydd CoOP</th><th>Consultee(s)</th></tr><tr><td>Operational Travel Scheme</td><td>Section 5.2 and 5.3</td><td>North Wales Police</td></tr></table> The standard items that would be included in an Operational Travel Strategy are already included in the Code of Operational Practice which has been updated at Deadline 5 (12 February 2019). Horizon therefore does not consider any such requirement is necessary.	Scheme	Wylfa Newydd CoOP	Consultee(s)	Operational Travel Scheme	Section 5.2 and 5.3	North Wales Police	
Scheme	Wylfa Newydd CoOP	Consultee(s)							
Operational Travel Scheme	Section 5.2 and 5.3	North Wales Police							

ExA Ref.	Question	Horizon's Response to Question	Comment
Q2.4.31	WN15 and WN 16 Construction and Operational Car Parking WG want Dalar Hir to be operational before construction commences and have 1,900 spaces by 2022. 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 2) Should parking provision be more precisely defined? 3) Should design drawings be submitted for construction parking irrespective of whether these would be temporary facilities?	1) The Phasing Strategy, as updated at Deadline 5 (12 February 2019), includes details of the timing of the delivery of the Park and Ride facility at Dalar Hir. That is, the Park and Ride must be delivered prior to the first nuclear construction date for Unit 1, which is anticipated to occur early in Construction Year 3. In addition, the Code of Construction Practice, a revised version of which has been submitted at Deadline 5 (12 February 2019), includes the following at paragraph 5.10.1: <i>"Horizon commits to manage, monitor and regulate the availability of car parking spaces to reflect the number of workers on the Wylfa Newydd DCO Project, balancing an over- provision of car parking (which could encourage car travel) with an under-provision of car parking (which could encourage fly parking)."</i> It is proposed to build the Park and Ride facility at Dalar Hir in one phase, but to make the car parking spaces available in stages in line with the above statement in the CoCP. WN15 and WN16 already contain specified maximum number of spaces. As stated in the Design and Access Statement (DAS) for the Park and Ride facility at Dalar Hir (updated at Deadline 2 [REP2-030]), it is proposed that charging points for electric vehicles (including buses) are provided at the Park and Ride facility. This would facilitate the use of alternative fuel vehicles. The locations of the proposed electric charging spaces are shown at Figure 40 of the DAS [REP2-030]. The CoCP has been further updated at Deadline 5 (12 February 2019) to include mode share targets for all construction workers for each year of the construction programme. The Phasing Strategy provides that prior to the opening of the Park and Ride, the percentage of construction workers travelling daily by car to the WNDA is not to exceed the mode share target for car travel specified in Table 5.1 of the CoCP. This provides further reassurance that traffic-related impacts will be kept within the levels assessed in the ES submitted as part of the DCO application. 2) Horizon's position is that the current wording in WN15 and 16 is appropriately defined as it retains the need for flexibility in the delivery of car parking throughout the construction	As per the IACC's response to Q2.4.31(1) [REP5-057] submitted at Deadline 5, the IACC would seek to agree upon the phased delivery of parking provision during the construction period of the project. The IACC continue to consider that minimum as well as maximum number of spaces needs to be prescribed for each phase in order to have any certainty that the proposed facility will serve the intended purpose. This is to ensure the IACC, as the Local Highway Authority, are satisfied the parking provision made available by Horizon at different stages of the construction project is appropriate to accommodate the fluctuating number of workers on the Wylfa Newydd DCO Project.

ExA Ref.	Question	Horizon's Response to Question	Comment
		programme whilst noting the restrictions already in place with regards to the management and use of the car parking spaces as set out in the response to item 1) above. 3) Horizon's position is that information on car park design and layout provided in the DCO application is appropriate given the need to maintain flexibility in the delivery of car parking across the Wylfa Newydd DCO Project. The numbers of car parking spaces are defined and spaces are allocated to specific work sites e.g. Wylfa Newydd Development Area or Park and Ride facility etc. The precise location of car parking spaces within the WNDA requires some flexibility to respond to changing requirements over the duration of the construction programme.	
Q2.4.32	SITE CAMPUS WORKS (PREFIXED "WN" 17-25) Should Schedule 3 5.(1) be amended to read WN17-WN23 and not WN17- WN25?	Horizon also identified this error and it has been amended as part of the Deadline 5 update to the draft DCO (Revision 4.0).	
Q2.4.33	WN20 Site Campus finished parameter plans and maximum finished dimension of buildings and other structures Maximum heights – Schedule 3 para 1(8) of Rev 2 now includes maximum height from above finished ground level. REP1-004 DCO revision 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. IACC wants both heights to be included for	In its response to Welsh Governments comments on the draft DCO from the DCO ISH (23 October 2018) [REP2-374], Horizon confirmed that the maximum parameter height for the Site Campus is based on a storey height of: • 3.5m (plus an extra 0.5m per floor tolerance); plus • 3.5m for the plant room on top of the 7th floor (with an extra 0.5m tolerance). This results in a total of 8 floors at a height of 4m each, equating to a total height of 32m in height. As noted in the Design and Access Statement [REP4-017], a floor height of 3.5m has been proposed to allow flexibility in storey height to allow for use of different manufacturers. In response to further queries from Welsh Government's at Deadline 4 [REP4-053], Horizon confirmed that the maximum height of 32m was used in the visual and landscape assessments for the Site Campus. Horizon does not consider that both heights need to be included within the parameters in	The IACC accept Horizon's explanation for the maximum parameter height for the Site Campus (and this has been assessed in the ES). However, the IACC remain of the view that flexibility is required for the other accommodation blocks to allow for potential changes in the size and number of accommodation blocks required. Please see comments on q 2.4.28 also related to this point.

ExA Ref.	Question	Horizon's Response to Question	Comment
	more clarity. Has this been resolved and if so, where in the documentation?	Schedule 3 as 32m represents the maximum parameter for the 7 storey accommodation blocks. The plans also already identify that all accommodation blocks include a rooftop plant room as well as 0.5m per floor tolerance (see WN0902-HZDCO-SCA-DRG-00002 and WN0902-HZDCO-SCA-DRG-00015 [APP-016]).	
Q2.4.34	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?	IACC already have the right to approve the designs for the Multi-Use Games Area and the amenity building (which will house the majority of the leisure facilities) and surrounding landscaping of the Site Campus under Requirements WN19 and WN21 of the draft DCO. These designs will need to be in accordance with the parameters in the requirements and the design principles in the Volume 3 of the Design and Access Statement [REP2-029]. The design principles control a number of matters at the Site Campus, including lighting, landscape design, drainage, surfacing and fencing. Illustrative proposals of the sports and leisure facilities have been provided as part of the DCO Application (refer to the illustrative design drawings for the Site Campus [APP-016]) and Volume 3 of the Design and Access Statement [REP2-029] (DAS)). These provide indicative designs for these features which will be secured through design principles.	
Q2.4.35	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. What is the Applicants view?	Horizon has already committed to retaining the campus on site until the worker demand ramps down and then progressively decommissioning the facility including the return/reinstatement to agricultural land as per existing area. Requirement WN23 provides that Horizon must submit for approval a decommissioning scheme prior to any decommissioning works commencing. This scheme must outline the timing and phasing of decommissioning and must be submitted no later than six months prior to the anticipated Unit 2 Commissioning Date (approximately Year 9 of construction). Therefore, the requirement already addresses Land and Lakes' request. In addition, Horizon has also committed to an occupancy target of 85% in the draft s.106 agreement and so, where occupation cannot meet that target, Horizon would look to decommissioning the Site Campus to avoid being in breach of this obligation.	The IACC agree with the proposed approach by the Applicant. However for clarity, the Site Campus Decommissioning Plan must align with the construction workforce accommodation profile and should not be seen as a means of reducing TWA bedspaces to meet occupancy targets.

ExA Ref.	Question	Horizon's Response to Question	Comment
Q2.4.36	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. (Title still includes reference to cycle parking despite Applicants response at D2.) Has progress been made in reaching agreement between the parties?	OPSF5 requirement applies to Off-Site Power Station Facilities at Llanfaethlu (Work No.5 - MEEG/AECC Building and ESL Building). As provided in response to FWQ14.0.8 Horizon does not intend to provide purpose-built cycle parking as the number of operational employees for this site will be small and any cycle provision can be facilitated within the buildings when required. In regards, to electric charging points Horizon will commit to one electric charging point which will be secured in the Design Access Statement (Updated Version for Deadline 6 – 19th February).	
Q2.4.37	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. Are the parties still in disagreement and if so, why?	Following a meeting with IACC on 1 February 2019, Horizon understands that there is now agreement with IACC on the number and management of car parking spaces at the Park and Ride Facility. This agreement reflects the changes made to the Code of Construction Practice including the inclusion of paragraph 5.10.1 of Version 2 of the CoCP to state: <i>“Horizon commits to manage, monitor and regulate the availability of car parking spaces to reflect the number of workers on the Wylfa Newydd DCO Project, balancing an over- provision of car parking (which could encourage car travel) with an under-provision of car parking (which could encourage fly parking).”</i> In terms of cycle parking, 25 cycle parking spaces will be provided at the Park and Ride facility as stated in the Design & Access Statement – Volume 3.	The IACC can accept the number of car parking spaces at Dalar Hir on the conditions that the additional park and shares are utilised and that car-sharing targets of 1.5 people per car is achieved across the entire project.
Q2.4.39	LC3 (4) Maintenance of landscaping 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”.	Separate landscaping schemes have been proposed for: • A5025 Off-Line Highway Improvement Works (31.6ha); • Ecological Compensation (total 49ha) due to their need to provide sufficient habitat; • The WNDA (407ha); and • The Site Campus (15ha) – due to its relationship as part of the WNDA and need to be an attractive site for residents.	Any developer applying for development on the Parc Cybi business park would be required to submit a landscape and habitat scheme and maintenance plan for this site. Although the Logistics Centre may be operational for only 7 - 8 years, any landscaping done by HNP on the site is likely to remain well beyond this and, if done appropriately, could provide a valuable landscape, visual and ecological legacy. It is important, therefore, that a landscape and habitat scheme and maintenance plan is submitted to IACC for approval.

ExA Ref.	Question	Horizon's Response to Question	Comment
	IACC disagrees and does not accept the site is small. What would prevent a new requirement for a landscaping scheme to be submitted/approve to IACC for works at the Logistics Centre?	In comparison, the Logistics Centre (3.2ha), the Off-Site Power Station Site (1.4ha) and the Park and Ride Facility (19.5ha) are functional sites and will have limited, or simplistic, landscaping that will not comprise landscaping or habitat that needs to be managed and maintained to ensure ecological and visual mitigation. For example, the proposed landscaping details for the Logistics Centre illustrate that the majority of the site will be asphalt with grass, hedgerow and minor areas of woodland edge planting around the perimeter of the site [APP - WN0902-HZDCO-ADV-DRG-00016]. For this reason, a detailed landscape maintenance scheme is completed disproportionate with the landscaping that will be planted on the site. Horizon has already committed to maintaining any landscaping that is provided on site for a period of 5 years and to ensure that any landscaping which needs to be replaced is replaced with species of a similar size to what was removed. This will ensure that the landscaping is maintained in a consistent state for the duration of the Work (which will only be operational for a temporary period of 7-8 years).	
Q2.4.40	LC6 What is the Applicants response to the following: (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.	Horizon agrees with the Welsh Government's suggestion to include the A55 and the ExA's suggestion that the definition of emergency should be expanded as closure of the Britannia Bridge would have a major disruption to HGV movements and Horizon was recently affected by the closure of the Bridge. For this reason, Horizon has amended Requirement LC6 in the Deadline 5 update of the draft DCO (Revision 4.0) to expand the definition of "emergency" within LC6(2). In relation to the maximum numbers of 100 HGVs on the site, this number has been chosen as it forms the basis of the Environmental Statement assessment and so is considered appropriate. However, the emergency provision enables Horizon to exceed this minimum in the event of an emergency event that impacts the functioning of the A5025 and A55.	

ExA Ref.	Question	Horizon's Response to Question
Q2.4.41	LC7 Applicant has amended the drafting of this at D1. IACC does not consider that the amendments address the issues it set out at D2. (1) What are the matters that are in dispute? (2) How could these be overcome? (3) What drafting would overcome the objections of IACC?	The amendments proposed by Horizon at Deadline 2 were intended to respond directly to the concerns that the requirement did not provide a trigger date for the submission of the strategy and could enable the Logistics Centre to be permanently retained. In response, Horizon: • Amended LC7(2) to state that the strategy had to be submitted to IACC for approval no later than 3 months prior to the anticipated Unit 2 Commissioning date (which is defined as) – rather than "prior to any decommissioning works). • Limited the circumstances in which the Logistics Centre could be retained – see new paragraph (5). In its response to FWQ4.0.93 [REP2-153], IACC had stated that decommissioning should be set out in a fuller Phasing Strategy. As noted by Horizon in response to IACC's request for the Phasing Strategy to deal with decommissioning of key mitigation (like the Site Campus and Logistics Centre), the focus of the Phasing Strategy is on securing the delivery of key mitigation in order to avoid adverse effects of the Wylfa Newydd DCO Project – rather than the removal of this key mitigation at the end of the Project (which is dealt with through the decommissioning requirements). For this reason, LC7 was not amended to address IACC's specific request; however, it was amended to seek to provide further certainty around when the decommissioning strategy for the Logistics Centre would be submitted for approval.
Q2.4.42	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	In its response to Welsh Government's comments on the draft DCO from the DCO ISH (23 October 2018) [REP2-374], Horizon confirmed that it had no issue with the proposed article although it was not strictly necessary given that section 149A of the Planning Act 2008 was clear that no deemed marine licences may be included within Welsh DCOs. However, as noted in its response to Welsh Government's Deadline 4 submission [REP4- 053], Horizon has inserted the wording proposed by Welsh Government for the avoidance of doubt into the Deadline 5 update of the draft DCO (see new article 49).

ExA Ref.	Question	Horizon’s Response to Question
	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 doesn’t specifically identify the articles/powers/requirements relating to marine works and it deals with inconsistencies. 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	

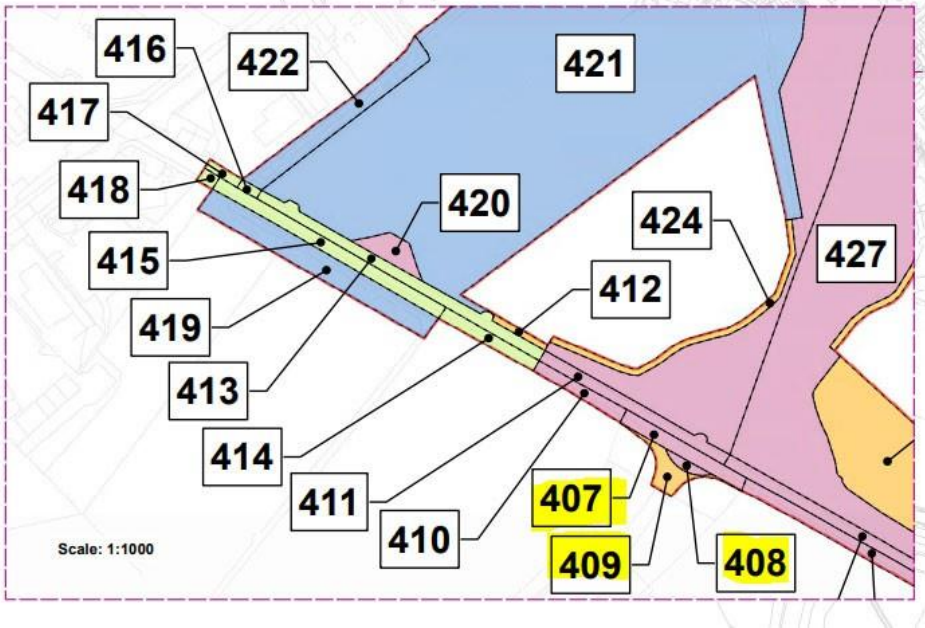
ExA Ref.	Question	Horizon’s Response to Question
	obviates the need to obtain a marine licence under Part 4 of the 2009 Act or to comply with the conditions of any marine licence. What are the Applicant’s views regarding inclusion of this Article in the DCO?	
Q2.4.43	Schedule 19 Does the Applicant wish to make any further comments regarding the proposal that the Welsh Government should be the appellate body as it is for planning applications?	Horizon's position remains the same as outlined by Counsel at the second DCO ISH (9 January 2019)[REP4-004], that is that it has no particular preference as to the body which has the appellate role but it wishes to ensure the position is legally correct and reflects the devolution arrangements. In relation to the points made by Welsh Government in its Deadline 4 submission [REP4- 053], Horizon would like to make the following additional points: • Welsh Government has no power to, and Horizon agrees that it is not seeking to, legislate in respect of nuclear installations or planning for an on-shore electricity station (as these are both reserved matters under paragraphs 99 and 184 of Schedule 7A of the Government of Wales Act 2006). • Welsh Government has been granted functions under the Town and Country Planning Act 1990 ("TCPA") and is the appellate body in respect of any appeals under that legislation. These functions were granted by virtue of article 2 and paragraph 1 of Schedule 1 of the National Assembly for Wales (Transfer of Functions) Order 1999/672. • While the Welsh Government argues that it should have appeal body status due to it having planning functions in relation to TCPA applications (which it seeks as also applicable to DCOs), Horizon notes that Welsh DCOs have taken two approaches to identifying the appeal body under the DCO Requirements – either identifying the Welsh Ministers or the Secretary of State ("SoS") as the appeal body. • Although Welsh Government stated at the DCO ISH that it has been identified in every Welsh DCO that it has been involved in, Horizon notes that in the North Wales Wind Farms Connection DCO, both the Examining Authority and the Secretary of State expressly declined the Welsh Government's request to be the appeal body

ExA Ref.	Question	Horizon’s Response to Question
		within the DCO. In that DCO, the Secretary of State was named the appeal body. The North Wales Wind Farms Project, like Swansea Bay, is an electricity NSIP. (WE have attached the relevant extracts from those decisions where the ExA and the SoS specially address the Welsh Government's request). • For this reason, we do not think that it is a straightforward situation where the Welsh Government is always the appropriate body to be the appeal body in respect of a Welsh DCO. For this reason, Horizon leaves the ultimate decision in the hands of the SoS. • In respect of the Welsh Government's reliance on section 120 of the Planning Act and Advice Note 15 to justify its position, Horizon notes that: – The wording of section 120 of the Planning Act 2008, Horizon notes that it is permissive in that it is "may" not "will". In addition, the wording of limb (a) states "requirements corresponding to conditions which could have been imposed on the grant of any permission, consent or authorisation ..." Therefore, it is also wider than just conditions which could have been imposed on a planning permission. Finally, limb (b) envisages other types of requirements which require the approval of the Secretary of State. – the Planning Inspectorate's website clarifies that “Advice notes which deal with the PA2008 process are non-statutory. They are published to provide advice and information on a range of issues arising throughout the whole life of the application process. Although in many cases they include recommendations from the Planning Inspectorate about the approach to particular matters of process, which applicants and others are encouraged to consider carefully, it is not a requirement for applicants or others to have regard to the content of advice notes.”
Q2.4.44	Historic Environment – requirement for recording/assessment WG has proposed a new requirement. The following observations and comments are made as below:	It is not clear who has made the comments in square brackets and so Horizon is unable to comment further on these. In any event, as part of the Deadline 5 update of the draft DCO (Revision 4.0). Horizon has proposed that it will submit, for approval, an Archaeological Mitigation Scheme on the basis that stakeholders did not agree that the measures within the Wylfa Newydd CoCP were sufficient. (Horizon has also addressed this proposed requirement in its response to the

ExA Ref.	Question	Horizon's Response to Question
	16 (2)"The scheme [submitted and approved - aren't these words redundant?] must be in accordance with " 16(5) "Any archaeological investigations [implemented – isn't this word redundant?] .." 16(5)(b) .."by Cadw in consultation with Cadw" [how does this work? clarify the different roles of Cadw here?] 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]. Do IPs wish to comment?	Welsh Government's Deadline 4 submission.) Horizon would welcome comments from stakeholders on this new draft requirement.
Q2.4.45	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).	As noted at the second DCO ISH [REP4-004], there is only one set of works in the marine area and those will be subject to a Marine Licence. As the licensing authority, NRW will be entitled to recover its cost for doing so under the Marine Licensing (Fees) (Wales) Regulations 2017. While those same works appear in the draft DCO, it is intended that the Marine Requirements will duplicate the terms of the Marine Licence and so NRW would be able to discharge works or documents under both regimes in the same way. Horizon is engaging with NRW over the fee structure in Schedule 19 and has agreed in principle to amend the fee schedule to align with NRW's concerns (provide this does not result in double charging for the same works). These amendments will be, once agreed with NRW, included within the updated draft DCO submitted at Deadline 8.

ExA Ref.	Question	Horizon’s Response to Question
Q2.4.46	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?	Although the WNMPOP has been structured out of the s.106 agreement (see Horizon's response to Q2.4.20), Horizon considers that a number of what were called the "subgroups" to the WNMPOP perform a valuable role. These have accordingly been retained as "Engagement Groups", and will be constituted under the s.106 agreement as follows: • The Welsh Language Engagement Group (schedule 1). • The Jobs and Skills Engagement Group (schedule 4) • The WAMS Oversight Board (schedule 5). (This was already agreed as an entity, and its role has been expanded to take on the previously named Accommodation sub-group's roles). • The Transport Engagement Group (schedule 7). • The Health and Wellbeing Engagement Group (schedule 8). • The Emergency Services Engagement Group (schedule 9). The s.106 agreement will also set out who will be invited to participate in the engagement groups and the roles and duties of the groups. It is proposed that the members of the Emergency Services Engagement Group will be a representative from each of the Council, the Developer, the Welsh Government, North Wales Police, North Wales Fire and Rescue Service, and Welsh Ambulance Service Trust.
Q2.4.47	Please respond to the comments made by Trinity House at REP4-056 in response to First Written Questions.	Horizon has reviewed Trinity House's Deadline 4 submission [REP4-056] and has included amendments sought to articles 59 and 78 by Trinity House in the Deadline 5 update to the draft DCO (Revision 4.0).

ExA Ref.	Question	Horizon's Response to Question
Q2.4.48	(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?	Horizon circulated draft protective provisions relating to highways to IACC on Wednesday 30 January 2019. Horizon expects that these draft protective provisions will address much of IACC's concerns, including in respect of the powers of compulsory acquisition Horizon is seeking in respect of the highways land. Horizon is confident that it can work with IACC over the coming month to finalise suitable protective provisions and reach an agreed position, to the extent possible, in advance of the March hearings.
Q2.4.49	(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.	(1) All current draft protective provisions have been included within the draft DCO submitted at Deadline 5 (Revision 4.0). Horizon has agreed the protective provisions that will apply to Magnox and is currently negotiating protective provisions with IACC, Welsh Water, National Grid, Nuclear Decommissioning Authority, Network Rail and SPEN. (2) Horizon anticipates that the final protective provisions with Welsh Water, National Grid, SPEN and NDA can be agreed and included at Deadline 7. All drafts of the Protective Provisions will be included in the updated draft DCO submitted at Deadline 5 (Revision 4.0). The protective provisions with Network Rail pose the greatest issue at this stage due to the fact that Horizon considers that the protective provisions it is seeking are grossly out of proportion to the interest that is affected. Horizon is seeking compulsory acquisition and temporary use rights over plots in which Network Rail and its tenant Direct Rail Services have interests; namely plots 407 (436 sqm), 408 (84sqm) and 409 (285 sqm). The Plots include land which is leased to Direct Rail Services for use as a nuclear loading facility (operational until end of 2019) and land which is public highway. These plots, as shown on Land Plan WN0902-HZDCO-LPN-DRG-00007 [APP-010], are located quite some distance from Network Rail's railway network.

ExA Ref.	Question	Horizon's Response to Question
		 Horizon requires the land to facilitate construction of the roundabout at Section 1 of the A5025 Off-Line Highway Improvements and will not impact Network Rail's access to the freight yard during construction. Network Rail is seeking for the full suite of its protective provisions to be included within the DCO and for no CPO powers to be exercised in relation to its land unless it provides its approval. Horizon does not consider the protective provisions as proposed are appropriate, given the land affected by permanent acquisition (which will transfer to IACC on completion) only equate to 520 sqm and Horizon considers that access arrangements over Plot 409 (285 sqm) can be adequately secured through an access agreement with Network Rail.

ExA Ref.	Question	Horizon’s Response to Question
		Horizon will continue to negotiate with Network Rail but is fundamentally opposed to the full suite of protective provisions being included within the draft DCO.
Q2.4.50	Provide an example of another project/S106 agreement where similar management mechanisms to the WNPOP have been used.	The WNMPOP has been structured out of the s.106 agreement (see Horizon's response to Q2.4.20), as such Horizon does not propose a detailed response to the question.
Q2.4.53	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: 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.	A copy of the Horizon Group structure and how it relates to Hitachi, Ltd is set out below. For the sake of completeness, this Group structure includes reference to two Horizon companies not the subject of question 2.4.53, being Horizon Nuclear Power Oldbury Limited and Horizon Nuclear Power Services Limited. Hitachi, Ltd is the ultimate owner of the entire issued share capital of the Horizon entities, through its 100% ownership of its immediate subsidiary Horizon Nuclear Projects Development Europe Limited (“HNPDE”).

ExA Ref.	Question	Horizon's Response to Question
		KEY - Companies currently within the Horizon Group - Horizon Wylfa – the Site Licence and Environmental Permit Applicant - Horizon Services – the Company holding contracts with employees The Horizon Group <pre>graph TD; Hitachi[Hitachi, Ltd.] --> HNPDE[Hitachi Nuclear Projects Development Europe Limited]; HNPDE --> HNP[Horizon Nuclear Power Limited]; HNP --> HNP_Oldbury[Horizon Nuclear Power Oldbury Limited]; HNP --> HNP_Wylfa_Holdings[Horizon Nuclear Power Wylfa Holdings Limited]; HNP_Wylfa_Holdings --> HNP_Wylfa_Limited[Horizon Nuclear Power Wylfa Limited (HORIZON WYLFA)]; HNP_Wylfa_Limited --> HNP_Services_Limited[Horizon Nuclear Power Services Limited (HORIZON SERVICES)];</pre> 1. Company directors

ExA Ref.	Question	Horizon's Response to Question			
		A list of the current directors of each of HNPDE, Horizon Nuclear Power Limited, Horizon Nuclear Power Wylfa Holdings Limited and Horizon Nuclear Power Wylfa Limited is also provided in table A			
		<u>Table A: Table of Directors:</u>			
		Hitachi Nuclear Projects Development Europe Limited	Horizon Nuclear Power Limited	Horizon Nuclear Power Wylfa Holdings Limited	Horizon Nuclear Power Wylfa Limited
		Masahide Tanigaki	Sir Stephen John Gomersall	Sir Stephen John Gomersall	William Alastair Stein Doig
			Duncan Hawthorne	Duncan Hawthorne	Rabih Hafez
			Sang Hoon David Lee	Sang Hoon David Lee	Duncan Hawthorne
			Yoshiteru Murase	Katsumi Nagasawa	James William Jones
			Katsumi Nagasawa	Dr Timothy John Stone	Sang Hoon David Lee
			Dr Timothy John Stone	Masahide Tanigaki	Mark Henry Bernard Lunn
			Hidetoshi Takehara		Yoshiteru Murase

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			Masahide Tanigaki		Masahiko Nakane
					Gwen Susan Parry- Jones
					Dr Kenneth James Petrunik
					Dr Timothy John Stone
					Anthony Richard Webb
					Lisa Claire White
2. Corporate governance arrangements					
With the agreement of Hitachi, Ltd, the Boards of the various companies in the Horizon group have delegated certain powers to the respective Chief Executive Officers of each company. These are set out in an agreed Delegations of Authority policy (the “DoA Policy”) which sets out the decisions that can be taken by the CEO of the companies within the Horizon group. The DoA Policy authorises the delegation of certain powers within the limits granted and subject to the reserved powers and restrictions set out within the document.					
3. Responsibility for Final Investment Decision					
Responsibility for making or approving the Final Investment Decision in respect of the Wylfa Newydd DCO Project is a decision that will be taken by the Board of Hitachi, Ltd, following					

ExA Ref.	Question	Horizon’s Response to Question
		approval and recommendation of the respective subsidiary Boards. 4. Project finance Financial resources for developing the Wylfa Newydd Project has historically been provided by Hitachi, Ltd through a mixture of equity subscriptions and loan arrangements. Hitachi, Ltd had funded the project whilst discussions had been continuing with the UK Government and the Government of Japan on the financing and associated commercial arrangements that would enable a final investment decision to be taken and allow the construction of the project to commence. Unfortunately, despite the best efforts of everyone involved, it has not been possible to reach an agreement to the satisfaction of all concerned and therefore Hitachi, Ltd has recently announced that the Wylfa Newydd project has been suspended until such time as an appropriate solution can be found.
Q2.4.54	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’. The following should be noted: Planning Act 2008 105 [Decisions in cases where no national policy statement has effect] 1	Horizon accepts that the legal and policy context as detailed by the Examining Authority is relevant. Horizon notes that, with respect to section 105 of the Planning Act 2008, Horizon's DCO application was made pursuant to section 105 of the Planning Act 2008 and in accordance with the Statement of Energy Infrastructure: Written Statement – HLWS316 which confirmed that nuclear power stations yet to apply for development consent and due for deployment beyond 2025 should be considered under section 105 rather than section 104. Please refer to the Planning Statement [APP-406] which sets this out in more detail. With respect to section 122 of the Planning Act 2008 and the Guidance related to procedures for the compulsory acquisition of land, Horizon has made reference to this legal and policy context where appropriate in its responses to the questions that follow. In particular, please see Horizon's response to Q2.4.55 and Q2.4.61.

ExA Ref.	Question	Horizon's Response to Question
	(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. (2) In deciding the application the Secretary of State must have regard to— (c) any other matters which the Secretary of State thinks are both important and relevant to the Secretary of State's decision. Statement on Energy Infrastructure: Written statement - HLWS316 Planning Act 2008 122 Purpose for which compulsory acquisition may be authorised (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. (2) The condition is that the land—.... (3) The condition is that there is a compelling case in the public interest for the land to be acquired compulsorily.	

ExA Ref.	Question	Horizon's Response to Question
	Planning Act 2008 - Guidance related to procedures for the compulsory acquisition of land Resource implications of the proposed scheme - paragraph 17: 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. Compelling case in the public interest: paragraphs 12 and 13: In addition to establishing the purpose for which compulsory acquisition is sought,	

ExA Ref.	Question	Horizon's Response to Question
	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. 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 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. Other matters – paragraph 19 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: • any potential risks or impediments to implementation of the scheme have been properly managed; The Applicant should make reference as appropriate to the above legal and policy	

ExA Ref.	Question	Horizon’s Response to Question
	context in answering all the questions below.	
Q2.4.55	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?	Hitachi's decision to move the company towards a suspended state by end of March 2019, as reported in the letter to the Examining Authority dated 21 January 2019, does not undermine Horizon's case for the Wylfa Newydd DCO Project as set out in the Statement of Reasons [APP-032] and the accompanying Oxera Report submitted as part of its DCO application. The fact remains that there is an urgent need for new nuclear power generation in the UK, and the Wylfa Newydd Project at Wylfa presents the best opportunity of delivering this as soon as possible, while at the same time deriving long-term, significant economic opportunities for Anglesey and in the wider North Wales region. Any resulting delay to the delivery of the Wylfa Newydd Project as a result of the recent suspension does not undermine this. It follows that the same must be said in respect of the compulsory acquisition powers being sought in the draft DCO to deliver the Wylfa Newydd DCO Project. As described in the Statement of Reasons, compulsory acquisition powers are justified on the basis that they are necessary to facilitate the construction, operation and maintenance of the Wylfa Newydd DCO Project. The use of such powers would be legitimate, necessary and proportionate to the Wylfa Newydd DCO Project and in the public interest; such that they satisfy section 122 of the Planning Act 2008. This is expanded on below. Section 122 of the Planning Act 2008 provides that an order granting development consent may include provision authorising the compulsory acquisition of land only if the Secretary of State is satisfied that the following conditions are met. <i>“(2)The condition is that the land:</i> <i>a) is required for the development to which the development consent relates;</i> <i>b) is required to facilitate or is incidental to that development; or</i> <i>c) is replacement land which is to be given in exchange for the order land under section</i>

ExA Ref.	Question	Horizon's Response to Question
		131 or 132; <i>(3) The condition is that there is a compelling case in the public interest for the land to be acquired compulsorily."</i> Also relevant is the Department for Communities and Local Government Guidance, Planning Act 2008: Guidance related to procedures of compulsory acquisition (updated 2013) (Guidance), and the European Convention of Human Rights which requires that affected persons must have a fair and public hearing by an independent and impartial tribunal. The land over which powers of compulsory acquisition is sought, is all land that is required for, or to facilitate the Wylfa Newydd DCO Project. The extent of the Order Land required for the Wylfa Newydd DCO Project has been determined according to the operational requirements of the proposed Power Station, and its associated developments supporting its construction, operation and maintenance, and to mitigate its effects. In appraising and selecting sites, and developing its design, Horizon has sought to limit, so far as practicable, the land take, the environmental impact and the loss of property. The Statement of Reasons Justification Table provided at Appendix 11-1 which is due to be updated at Deadline 6 details which compulsorily acquisition powers are sought in respect of which plots of land, and the corresponding works proposed for that land for which those powers are required. The table demonstrates that: - the interest proposed to be acquired in that land is for a legitimate purpose, and is necessary and proportionate to the work proposed on that land; and - Horizon has a clear idea of how it intends to use the land that it is proposing to acquire. To the extent possible, Horizon has sought to acquire all rights and interests in land necessary for the Wylfa Newydd DCO Project through private agreement on commercial terms. While Horizon has successfully acquired or obtained options and leases over a large number of land parcels and rights, powers to compulsorily acquire the remaining rights and interests are necessary to ensure delivery of the Wylfa Newydd DCO Project.

		Horizon maintains that there is a compelling case in the public interest for the land to be acquired compulsorily. As explained above, the Wylfa Newydd Project at Wylfa presents the best opportunity to meet the urgent need for new nuclear power generation and deliver this energy as soon as possible, while at the same time deriving long-term, significant economic opportunities for Anglesey and in the wider North Wales region. The public benefits that would be derived from the compulsory acquisition of land and interests in land for the delivery of the Wylfa Newydd DCO Project outweighs the private loss that would be suffered by those whose interests in land and/or rights over land are to be acquired. Without the power to acquire compulsorily the necessary interests in and rights over land, Horizon would be unable to guarantee the delivery of the project. Accordingly, as contemplated by section 122(3) of the Planning Act 2008 and the Guidance, if powers of compulsory acquisition were included in any DCO granted for the Wylfa Newydd DCO Project, the use of such powers would be legitimate, necessary and proportionate for the purpose of constructing and operating the Wylfa Newydd Power Station in the public interest; and in satisfaction of section 122 of the Planning Act 2008, the Guidance and the European Convention of Human Rights. Horizon maintains that its Statement of Reasons remains appropriate. However, as indicated above, the Justification Table at Appendix 11-1 does require some minor amendments to reflect changes that have be made since it was submitted. Horizon is therefore revising its Statement of Reasons, including the Statement of Reasons Justification Table and will be submitting a revised Statement of Reasons at Deadline 6. Horizon notes that the changes being made to the Justification Table reflect minor amendments that Horizon has made to the compulsory acquisition powers it is seeking in respect of certain plots of land. These changes are as a result of further engagement with interested parties since the DCO application as submitted and/or to reflect further refinement to the design of the Wylfa Newydd DCO Project.
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ExA Ref.	Question	Horizon's Response to Question
Q2.4.56	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] 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 Provisions) Regulations 2010. 5) What financial contingency measures are in place to ensure that, should the project be abandoned during or following	1) Horizon's current estimate for the cost of the Wylfa Newydd DCO Project remains as set out in the Funding Statement [AP-033]. This estimate is based on previous work that Horizon has done with its delivery partners to determine the costs estimate for implementing the Wylfa Newydd DCO Project including costs of construction and the funding any additional land required. 2) Horizon is currently working to update the estimate of the cost of Compulsory Acquisition (CA) and will provide this information at Deadline 6. 3) The Power Station would be operational for approximately 60 years after which it would be decommissioned. Decommissioning would in accordance with any requirements imposed under the site's Nuclear Site Licence. Given this, it is difficult to estimate with any certainty how much decommissioning will cost. The Detailed Decommissioning and Waste Management Plan calculates a Base Cost (exclusive of risk and uncertainty) of £6.75B (at April 2016 values). The inclusion of estimating uncertainty and risk to the base cost value increases the estimate to £8.24B (at April 2016 values) at an 80% confidence level (P80). Further, Horizon notes that pursuant to the Energy Act 2008, a Funded Decommissioning Programme (FDP) approved by the Secretary of State making provision for the costs of decommissioning would be required to be in place before any construction works on the Wylfa Newydd DCO Project could begin. This is considered in more detail at part 4(c) of this response. 4) (a) Project funding As set out in the Funding Statement [APP-033] Horizon expects the funding for the Wylfa Newydd DCO Project to require external financing, potentially from both equity and debt sources. Negotiations with the UK Government have been ongoing for some time but, as the Examining Authority will be aware, an agreement as to the funding structure has yet to be reached. The expectation is that ongoing engagement with the UK government will continue in order to develop a deliverable funding arrangement. The UK Government has confirmed its commitment to new nuclear development including at Wylfa.

ExA Ref.	Question	Horizon's Response to Question
	the Site Preparation and Clearance Works or during the construction period, resources would be available to restore and secure the Wylfa Newydd site? 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?	Pursuant to NPS EN-1, the Examining Authority need only consider that an assessment of the financial viability of a project has been carried out. Horizon refers to NPS EN-1, paragraph 4.1.9 which provides that: <i>In deciding to bring forward a proposal for infrastructure development, the applicant will have made a judgement on the financial and technical viability of the proposed development, within the market framework and taking account of Government interventions. Where the IPC considers, on information provided in an application, that the financial viability and technical feasibility of the proposal has been properly assessed by the applicant it is unlikely to be of relevance in IPC decision making (any exceptions to this principle are dealt with where they arise in this or other energy NPSs and the reasons why financial viability or technical feasibility is likely to be of relevance explained).</i> Horizon is not proposing to submit an update to the Funding Statement at this time. As noted in the recent suspension announcement, Horizon will continue to engage with the UK government to seek to develop arrangements that will enable the development of new nuclear build at Wylfa. It is still envisaged that the most likely sources for this funding would be a combination of debt and equity. With the right arrangements in place, it will be possible to develop a commercially viable project on the WNDA. Paragraphs 2.2.1 and 2.3.2 - 2.3.4 of the Funding Statement should be read in the context outlined above. A copy of Hitachi's consolidated accounts for the fiscal year ended 31 March 2018 can be provided if required. For the sake of completeness, the issued share capital of Horizon Nuclear Power Wylfa Limited specified in paragraph 2.1.1 of the Funding Statement now stands at £1,677,398,002 4) (b) CA funding With respect to compulsory acquisition funding, Horizon appreciates the importance of there being adequate funding in respect of any exercise of compulsory acquisition powers to be included in the DCO. However, Horizon notes that the Examining Authority need only be satisfied that "there is a reasonable prospect of the requisite funds for acquisition becoming available" (see the DCLG Guidance on procedure for compulsory acquisition). The actual security for the value of the compulsory acquisition liability only needs to be in place at the time the compulsory

ExA Ref.	Question	Horizon’s Response to Question
		acquisition power is exercised. Horizon will consider a requirement to be inserted into the draft DCO under which appropriate security for compulsory acquisition liability would need to be in place before the powers could be exercised. 4) (c) Decommissioning funding It is accepted that operators of new nuclear power stations must meet the full costs of decommissioning, waste management and waste disposal for their proposals. The Energy Act 2008 sets out the framework for ensuring this. It requires operators of new nuclear power stations to have in place a FDP approved by the Secretary of State before nuclear-related construction may begin. An FDP must set out what financing arrangements the operator has in place to meet the full costs of decommissioning the power station and the costs of managing and disposing of waste generated by the power station, and demonstrate that "prudent provision" has been made for these costs. As such, it is not necessary for Horizon to demonstrate detailed funding for decommissioning at this DCO application stage. A costed FDP will be prepared and submitted to the Secretary of State at the appropriate time. 5) and 6) In the event that SPC Works had commenced and a decision is taken not to continue with the construction of the SPC Works or authorised development, Requirement SPC13 of the draft DCO requires that restoration of those parts of the WNDA affected by SPC Works must be undertaken in accordance with an approved restoration scheme and completed within 12 months. Failure to comply with the DCO is a criminal offence under the Planning Act 2008. Horizon considers that this is sufficient protection to ensure that any part of the site affected by the SPC works is appropriately restored and secured. As recognised by the Examining Authority during the Examination of the Hinkley Point C New Nuclear Power, national policy does not require that infrastructure projects must insure themselves against the possibility of incomplete development. [To impose an obligation for restoration security in the DCO or the DCO s.106 agreement would set a difficult precedent, which if applied more widely, would adversely affect funding and delivery of other infrastructure projects.]

ExA Ref.	Question	Horizon's Response to Question
		Although restoration security was agreed to by Horizon under the draft SPC s.106 agreement for the cost of those works (approximately £7.66 Million), this was agreed solely to address the risk of the works commencing under an SPC Works planning permission and the DCO not being granted. Horizon is not aware that any projects have required generalised security for works, even where funding for those DCO projects has not been secured.
Q2.4.57	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?	For the reasons explained in Horizon's responses to Q2.4.55, Q2.4.56 and Q2.4.61, Horizon considers that its Statement of Reasons [APP-032] and its Funding Statement [APP-033] remain both valid and appropriate despite Hitachi's decision to move Horizon towards a suspended state by end of March 2019. Horizon is, however, proposing to submit an updated Statement of Reasons to reflect minor changes that have been made to the compulsory acquisition powers that Horizon is seeking in respect of certain plots of land. An updated Statement of Reasons will be submitted at Deadline 6. Updated Books of Reference and Land Plans will be submitted alongside this Statement of Reasons. Horizon does not consider that any other DCO application documents require updating following the Hitachi decision.

ExA Ref.	Question	Horizon's Response to Question
Q2.4.58	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?	Horizon maintains that Hitachi's recent decision does not undermine Horizon's case for the Wylfa Newydd DCO Project (see Horizon's response to Q.2.4.55 and Q2.4.57), or the case put forward by Horizon in its DCO Application and the supporting information submitted throughout this Examination. Horizon remains committed to ensuring that the Examining Authority has before it all the necessary information to make a determination on the DCO application within the statutory timeframes; as will be evidenced from Horizon's responses to these Further Written Questions. Horizon will continue to work with the Examining Authority and key stakeholders to address any areas of uncertainty throughout the course of the Examination. Horizon considers that the Examining Authority has before it, and will have before it by the end of Examination, all the necessary information and sufficient evidence to make an informed determination on the draft DCO. As has been communicated to the Examining Authority, despite Hitachi's decision to move the company towards a suspended state by end of March 2019, Horizon intends to see this DCO application through to the conclusion of Examination. As such, Horizon does not consider that an exercise of the Secretary of State's powers under section 98(4) is required.
Q2.4.59	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]?	Horizon agrees that IACC should be included in the Compulsory Acquisition Schedule. IACC has been added to the updated Compulsory Acquisitions Schedule submitted at Deadline 5.

ExA Ref.	Question	Horizon's Response to Question
Q2.4.60	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.	Horizon remains of the view set out in its Deadline 3 response [REP3-019] that the DCO should be the single instrument authorising the highways work, and the protective provisions are the appropriate vehicle for protecting IACC's rights and interests as highway authority. IACC has not raised this specific issue further in any of its subsequent engagement. Since Deadline 3, however, discussions with IACC regarding Horizon's compulsory acquisition proposals and its interests as Highway Authority have recommenced. To this end, IACC advised Horizon that it has undertaken a plot by plot analysis of Horizon's acquisition proposals and provided a note summarising its outstanding queries and/or concerns with respect to these. A number of these concerns were described by IACC as holding objections subject to agreeable protective provisions. Horizon is considering the queries and concerns raised by IACC and will revert to IACC on these as soon as possible. Horizon has, however shared revised draft protective provisions with IACC for its consideration. IACC is yet to revert on these draft provisions but as noted in its response to Q2.4.48, Horizon expects that these draft protective provisions will address much of IACC's concerns regarding the powers of compulsory acquisition over highways land. Both parties are committed to resolving these outstanding issues and Horizon considers that agreement on much of these matters will be achievable before the compulsory acquisition hearing in March.
Q2.4.61	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 update/clarification in regard to the answer provided in REP2- 375 for First Written Question Q4.0.25.	Please see Horizon's response to Q2.4.55. As Horizon confirms in that response, Hitachi's decision to move the company towards a suspended state by end of March 2019 does not undermine Horizon's case for the Wylfa Newydd DCO Project as set out in the Statement of Reasons [APP-032] and the accompanying Oxera Report, for the reasons given in that response. The fact remains that there is an urgent need for new nuclear power generation in the UK, and the Wylfa Newydd Project at Wylfa presents the best opportunity of delivering this as soon as possible. It follows that the same must be said in respect of the compulsory acquisition powers being sought in the draft DCO. As described in the Statement of

ExA Ref.	Question	Horizon’s Response to Question
		Reasons, compulsory acquisition powers are necessary in any DCO for the Wylfa Nyewdd DCO Project to facilitate its construction, operation and maintenance. Without the power to acquire compulsorily the necessary interests in and rights over land, Horizon would be unable to guarantee the delivery of the project. Any resulting delay to the delivery of the Wylfa Newydd Project as a result of Hitachi's recent decision does not have any implications in respect of the above. With respect to the answer provided in REP2-375 for Q4.0.25 of the First Written Questions, please see Horizon's response to Q2.4.56.
Q2.4.62	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?	Horizon has considered REP4-050 and notes that this written submission raises concerns about Horizon's Requests for Non-Material Change relating to worker shift patters, HGV delivery times and construction working hours. It does not raise an objection to the compulsory acquisition powers that Horizon is seeking in the draft DCO. However, for completeness, the people who submitted REP4-050 have been added to the updated Compulsory Acquisitions Schedule submitted at Deadline 5. This approach is consistent with the approach taken to date in respect of the Compulsory Acquisition Schedule to include all persons identified by the Examining Authority as potential objectors. In this respect, Horizon notes that a number of the persons listed in the Compulsory Acquisition Schedule are not identified in the Book of Reference meaning they have not been identified as someone with an interest in land subject to, or potentially affected by the proposed compulsory acquisition powers. Further, Horizon notes that while many of these people have made representations on the Wylfa Newydd DCO Project, they have not specifically objected to the compulsory acquisition. Nevertheless, Horizon has maintained the schedule as prepared by the Examining Authority to ensure that all possible objectors are identified.

ExA Ref.	Question	Horizon’s Response to Question
Q2.5.1	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 on 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?	With regard to the points raised by the ExA in FWQ Q2.5.1 and the measures included in table 5-6 of the Shadow HRA [APP-050 / APP-051] that refer to controlling the risk of the introduction of invasive non-native species (INNS) in particular, these are treated as mitigation measures (in the Shadow HRA) in the context of the decommissioning works (as well as being a good practice characteristic of the works that is assumed will be implemented). However, Horizon submitted a supplement [AS-010] to the Shadow HRA [APP-050 / APP-051] which deals with the implications of the Court of Justice of the European Union (CJEU) ruling referred to as <i>People Over Wind and Sweetman v Coillte Teoranta</i> (C-323/17). Appendix 1 to [AS-010] comprises revised screening matrices (i.e. replacing those submitted in [APP-051]) which confirm that likely significant effects (LSEs) cannot be excluded for all European Designated Sites assessed in the Shadow HRA for the construction, operational and decommissioning phases (for a number of effects, including those for which a significant effect cannot be excluded without mtigation being put in place). In light of the revised screening conclusion, section 4.1 of [AS-010] (paragraphs 4.1.6 to 4.1.14) provides the information required for appropriate assessment with regard to INNS. The outcome of that assessment is that there would be no adverse effects on integrity of any European Designated Sites, either alone or in-combination with other plans or projects, in this context (i.e. the conclusion of the Shadow HRA is unchanged). With regard to controls on the timing of works to avoid the tern breeding season (as it is suggested would apply for the decommissioning phase in table 5-6 of the Shadow HRA), this measure is assumed to be part (i.e. a characteristic) of the project design in this case and, on that basis, LSE can be excluded for noise and visual disturbance during decommissioning. In contrast, such measures have not been proposed or treated as mitigation in the assessment of the construction phase because, for this phase, it is not viable to time works to avoid the tern breeding season. Consequently, for the construction phase, LSE cannot be excluded for noise and visual disturbance (as concluded in the Shadow HRA). Further more, in the Shadow HRA, there are no instances where controls on the timing of works have been used to exclude LSE. Hence the approach adopted to the treatment of mitigation when assessing potential for LSE (which is the material point being questioned in Q5.0.17 [PD- 009]) is not inconsistent.

ExA Ref.	Question	Horizon's Response to Question
		In conclusion, when the Shadow HRA and its supplementary information are considered together, Horizon's view is that there is no inconsistency in the treatment of mitigation between the assessment of the construction and operational phase effects of the Wylfa Newydd Project and the content of table 5-6 relating to approach taken to the assessment of LSE during the decommissioning phase.
Q2.5.2	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?	NRW's advice in response to Q5.0.46 [REP2-325] is asking for a distinction to be made between mitigation measures designed to avoid or reduce the effects of the Wylfa Newydd Project and measures aimed at compensating for the adverse effects of the Wylfa Newydd Project on a European Designated Site. Horizon refers the ExA to its response Q5.0.46 [REP2-375] which confirms that Horizon has considered the ruling in Court of Justice of the European Union (CJEU) ruling C-164/17) and having regard to it, considers that it has not included any measures that could be considered compensation measures in drawing its conclusions regarding predicted effects on European Designated Sites. Consequently, CJEU ruling C-164/17 is not considered to have any implications for the Appropriate Assessment. Given this, it is Horizon's view that a separate note is not warranted in this context.
Q2.5.6	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?	The Examining Authority has requested that Horizon provides references of scientific literature that deals directly with the effects of construction disturbance on Sandwich terns or closely related species. By 'closely related species' it is assumed that the Examining Authority are referring to other tern species. The study by Harwood <i>et al.</i> (2017)¹ considers the effects of the construction of the Sheringham Shoal offshore wind farm on the use of the site by commuting and foraging Sandwich terns. This wind farm is within the foraging range of breeding Sandwich tern

¹ Harwood, AJP, Perrow, MR, Berridge, RJ, Tomlinson, ML and Skeate, ER 2017 Unforeseen responses of a breeding seabird to the construction of an offshore wind farm. In Köppel, J (ed) *Wind Energy and Wildlife Interactions: Presentations from the CWW2015 Conference*. pp 19-41. Springer International Publishing.

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		colonies and, therefore, the findings of this study apply to breeding birds, although the study is not concerned with effects at the breeding colony itself. The abstract from this paper is appended to this response (and the study is referenced within the Shadow HRA [APP-050 and APP-051]). Horizon is not aware of any other references from the peer reviewed scientific literature that deal directly with the effects of construction activities on Sandwich terns or closely related species. However, the closest examples to this are: 1. The experimental study of Brown (1990)² on a colony of nesting crested terns of the effects of pre-recorded aircraft noise on tern response. Crested terns are a close relative of the Sandwich tern, both being of the genus <i>Thalasseus</i> according to the most recent taxonomic classification. 2. The PhD thesis by Jennings (2012)³ on the ecology of common terns nesting at the colony in the operational Leith Docks in Edinburgh, which included a chapter on the responses to disturbance events (including from anthropogenic sources). The common tern, like the Sandwich tern, is a ‘true’ tern but belongs to the genus <i>Sterna</i>, as opposed to <i>Thalasseus</i>. Also, it is the case that common terns have a greater tendency to nest in urban or industrial situations than do most other tern species. The abstracts of both of these studies are appended to this response and both studies are referenced within the Shadow HRA [APP-050 and APP-051].

² Brown, AL 1990. Measuring the effect of aircraft noise on seabirds. *Environment International*, **16**, 587-592.

³ Jennings, G 2012 The ecology of an urban colony of common terns *Sterna hirundo* in Leith Docks, Scotland. Unpubl. PhD thesis, University of Glasgow.

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Q2.5.7	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?	The following text describes how the red and amber noise levels have been and will be defined. The red noise levels are already defined. That is, the Technical Note indicating how Horizon would meet committed noise levels [REP3-048], sets out proposed noise thresholds that will not be exceeded during the works. These are the ‘red’ noise levels: - During the tern breeding period (as defined in the CoCPs) during the Main Construction phase – - blasting will only be undertaken when the predicted blast noise at the colony (taking account of weather conditions) will be less than 60dB or daily ambient noise at the colony (whichever is higher); - day-time construction noise at the colony will not exceed 59dB $L_{Aeq, 1-hour}$; - during night time maximum construction noise at the colony will not exceed 43dB $L_{Aeq, 1-hour}$. - During a four-week establishment period for the first two years of construction, blasting and day time construction noise at the colony will not exceed than 55dB $L_{AF,max}$ or the daily ambient noise at the colony (whichever is higher). The Technical Note covering baseline noise at Cemlyn Bay measured average noise at 49dB. For amber noise levels, it is proposed that Horizon will ensure that appropriate site management procedures are developed and implemented and that amber noise levels will be agreed with NRW prior to the commencement of construction activities. According to the Technical Note on noise commitments [REP3-048] amber levels will be noise levels sufficiently below the agreed red threshold to enable mitigation action to be taken before an exceedance occurs. Noise monitoring will be conducted both at the tern colony and at any intermediate control receptors that are considered necessary (currently six noise monitoring positions arranged

ExA Ref.	Question	Horizon's Response to Question
		around the site are proposed, which will make it easy to identify what noise is being created by different portions of the site). Intermediate monitoring points are normally established at locations closer to the noise source than the actual receptor and will provide additional noise data to support the early identification of potential problems and support early management interventions aimed at preventing any noise exceedance at the agreed receptor point. For construction noise (not blasting), because the noise levels described above work on a logarithmic scale and will be derived from hourly averages, it is Horizon's view that there will be sufficient time once noise levels 2dB below the red thresholds are met for an adequate response to be provided. At the very least, in this circumstance and for construction noise, if a 57dB LAeq, 1-hour amber threshold is met, the construction team would need to respond well within the next hour. For blasting noise (which will be monitored for each blast in isolation), if higher noise levels than expected are monitored at the colony, this would be able to be resolved (for example, through the use of smaller blasts) before the next blast occurs. Once the works are established and blast noise / response records populated, the team will be able to readily predict noise at the colony based on conditions and modify this as required for each blast. Regarding the use of hourly averages, noise levels in the environment are continuously variable, and there are already frequent loud events (e.g. jets overhead) which could cause a short-term average noise level to exceed the amber or red threshold. The shorter the averaging time, the more likely this is to happen and, therefore, the more 'false alarms' there would be. Hence the proposal to use hourly averages, which is considered to provide a reasonable balance between protection and practicality. The approach could also be designed to include a feedback loop so that if the chosen amber values are overly conservative (or not conservative enough) they could be adjusted. See also Horizon's response to Q5.2.12.
Q2.5.10	Without prejudice to the ExA's final	• In response to this request, and without prejudice to Horizon's position that it is not

ExA Ref.	Question	Horizon’s Response to Question
	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.	required or the Examining Authorities final recommendation regarding adverse effect on site integrity (at Stage 2 of the HRA process), Horizon has prepared an Assessment of Alternative Solutions (which represents Stage 3 of the Shadow HRA process) and an Imperative Reasons of Overriding Public Interest (IROPI) Report (Stage 4 of the Shadow HRA process). These documents have been submitted in parallel with this response at Deadline 5. • In addition, Horizon have provided at Deadline 5 a report on progress in respect of compensatory sites and the development of compensatory measures that Horizon has provided at Deadline 5.
Q2.5.12	What mechanisms would be used to decide which site activities would stop to reduce noise levels?	As set out in the Technical Note indicating how Horizon would meet committed noise levels [REP3-048], if an amber threshold is breached (see Horizon’s responses to FWQ 2.5.7 and 2.5.13), the Site Manager will determine when and what action needs to be undertaken on site; based on an open line of communication with the Ecological Clerk of Works responsible for monitoring noise levels and/or the professional colony observers. Relevant protocols will be established in this regard (as set out in the response to Q2.5.7). The following mechanisms which are standard practise for large scale infrastructure projects are available to the Site Manager r will include (but not be limited to): • plant/equipment substitution; • adjusting the scheduling of the works; • adjusting the intensity of the works; • adopting alternative construction methodologies; and • temporary relocation of certain activities. Significantly, the options available to the Site Manager typically will be numerous and he or she will determine which machinery or activities need to be altered or stopped (in order to reduce noise levels at the colony to below response thresholds) based on their expert knowledge of the site and the activities taking place (for which he or she will have information on their acoustic signatures and distance from the colony) and taking account of Health & Safety and environmental risk appropriately. This will be informed by a detailed list of all plant and equipment being used on the site that

ExA Ref.	Question	Horizon’s Response to Question
		will include data on operating noise and emissions. Where a contractor proposes to change a plant type or increase the numbers of plant operating in a specific area, Horizon will assess the noise impact and risk of the thresholds being breached. This information shall be maintained and input into the established noise models to provide an additional means of informing the site of potential issues. The management processes and procedures in place (see Horizon’s response to Q2.5.7) should avoid any need to stop or alter works. However, should this be necessary, the noise data collated as part of the management procedure will be used to determine which activities could be amended and/or items of plant stopped to prevent or remedy any breach. There will also be a list of plant items that cannot be stopped, such as the pumps used to cross pump water from the western side of Mound E or pumps used to dewater deep excavations. It is, therefore, difficult to provide a list of specific mechanisms that can be implemented to determine which items of plant or construction activities will be stopped or amended in advance, as this is likely to vary from day to day depending on the criticality of activities. Indeed, there may be a preference to shut down or amend a larger number of less critical construction activities/ smaller plant items as opposed to stopping or altering a small number of larger noise contributing activities that may be on the critical path. Each decision will be fully assessed and, hence, the Site Manger will be accountable for the final decision and implementing an agreed action plan following discussion with relevant members of the site environment, ecological and Health & Safety teams. It is important to recognise that the noise experienced at the Cemlyn Bay tern colony will arise from a combination of activities (and noise signatures). Therefore, there will always be more than one approach that could be taken to reducing noise levels. In those instances where it is unsafe to stop an activity immediately (e.g. part why through stabilising a slope or pumping waste water), other action will be taken to reduce the noise levels experienced at the colony and, in those circumstances where the activity in question is particularly problematic, it will be altered or stopped as soon as it is safe to do so. Furthermore, the commitment that Horizon has made (see the Main Site Sub-CoCP submitted at Deadline 5) is to continue to monitor in order to verify that the control measures have reduced the noise levels to a level at the colony that does not cause disturbance

ExA Ref.	Question	Horizon’s Response to Question
		reactions. This will also provide a better understanding of the causes of any Project related tern ‘fly-ups’. Quite quickly, the Project activities responsible for any ‘fly-ups’ that do occur (if any occur) will be able to be identified (based on matching acoustic signatures with site activities). Site activities will then be reviewed to identify what alterations can be made (e.g. change in work intensity, schedules or methods, or additional noise abatement), improvement plans developed and alternatives approaches adopted where they are assessed as being safe and practicable. The outputs from this process will be reported by Horizon on a monthly basis and the process will be passively observed by the colony tern wardens during the breeding season.
Q2.5.13	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?	The approach proposed is relatively novel, particularly in the context of breeding seabirds, and this reflects the specificity of the circumstances. However, the approach is appropriate in this case (i.e. where the works are to occur some distance away from the colony and will only be distantly “heard” but the Construction site is large and a breeding tern colony is within its zone of influence). Such monitoring and management approaches are typically novel, in that they need to respond to the specific circumstances that are relevant in each case (that is, they are bespoke to each site and it’s unique challenges). Examples of other cases where a similar approach to the reactive noise monitoring has been used to mitigate effects do, however, exist and include: • The development of the Olympic Park in London, where the CoCP determined that plant had to meet certain noise limits and an assessment was made of the noise in combination (i.e. all operating plant). Based on the noise values measured plant would be removed/adapted/exchanged to meet the limits set out (see https://web.archive.nationalarchives.gov.uk/20130403013753/http://learninglegacy.independent.gov.uk/publications/the-control-of-noise-during-construction.php for lessons learnt). In practice, noise monitoring stations at key locations (agreed with stakeholders) continually monitored noise levels and a series of triggers allowed the site team to understand potential issues before limit where breached. Thus the data allowed contractors to adapt plant to ensure compliance with each incident being investigated to

ExA Ref.	Question	Horizon’s Response to Question
		allow continued improvement. • The Tidal Lagoon Swansea Bay Order (EN001049) includes an Adaptive Environmental Management Plan (AEMP) that covers monitoring and response protocols in order to determine the requirement for beach renourishment, maintenance dredging, action on water quality, measures to control INNS and the installation of acoustic fish deterrents (amongst others). • For marine mammals and underwater noise – using a Marine Mammal Observer to scan and call a hold on works until marine mammals have gone beyond a disturbance radius before an activity, such as piling, can start is common practice. This mitigation method has been used on Offshore Wind Farm projects including the Norfolk Vanguard (Norfolk Vanguard Limited, 2018, Norfolk Vanguard Offshore Wind Farm Draft Marine Mammal Mitigation Protocol), as well as for coastal developments such as Tidal Lagoon Swansea Bay (Tidal Lagoon Swansea Bay Plc, 2014, Environmental Statement Chapter 10 Marine Mammals and Turtles) and for harbour extension projects, such as for Aberdeen Harbour (Aberdeen Harbour, 2015, Aberdeen Harbour Expansion Project Environmental Statement Chapter 15 Marine Mammals). • For the Westernmost Rough Offshore Wind Farm construction: a “Rafting Auk Procedure” was applied during the post-breeding season (late June to September). This was to ensure that moulting auks from the Flamborough and Bempton Cliffs SPA remained safe from construction activities and did not collide with construction vessels. This was actioned via Marine Coordination (MC) for the project, which ensured awareness of the issue and the required actions by all construction vessels. Upon a rafting auk sighting the MC would inform all vessels on site and instruct them to follow the agreed procedure. This procedure involved vessels reducing their speed to 10 knots if within 1km of the reported sighting, and avoiding approaching within 1km of any rafting auks. The details of this mitigation are set out in the Public Register of the MMO’s Marine Case Management System (Case Reference: 34633/091124/12). • A very similar arrangement was put in place for the construction of the Jetty at Hinkley

ExA Ref.	Question	Horizon's Response to Question	Comment
		Point C (HPC); where, if rafting shelduck come within a specified distance of the jetty works, the works will be modified or cease (EDF, 2011 [Temporary Jetty Development - Shelduck Mitigation]; Harbour Empowerment Order 2012). Interestingly, breaches of noise limits at HPC where often due to specific activities, such as hedge cutting and the dawn chorus. Proposed shutdowns of construction activities for developments on/near estuaries during prolonged periods of cold weather also occur (and have been committed to by the Port of Felixstowe as part of the Bathside Bay Container Terminal Project, Harwich Haven (Error! Reference source not found., Posford Haskoning (2004)). This is in relation to wintering waterbirds and is applied under conditions that would result in a cold weather shooting ban.	
Q2.5.14	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?	Horizon has discussed this response with NRW and NRW have agreed that it should (and will) be addressed by them.	
Q2.6.1	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: 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	Horizon has the following responses to the National Trust on the matters noted. When viewing the plans provided and response provided here, it should be noted that the information provided in the Horizon response is illustrative and could be subject to development within the parameters of the DCO. 1) Horizon have reviewed the comment regarding earthworks shown on the Dwg 60PO80AS _ Q6.0.17_ 01b illustrative main construction activities and Dwg 60PO80AS _ Q6.0.17_ 02 illustrative operational layout. It is not clear what aspect of these drawings National Trust are referring to in paragraph 4 of REP3-056. It is assumed that comparison is being drawn to the local landform contour shown in the key and the landscape mounds shown on Figure 5-5 and	At the Accompanied Site Visit on Wednesday 13 February 2019, HNP discussed the works that would be carried out within Cestyll Garden (outside of the Valley Garden) including: the temporary causeway, temporary cofferdam bund, temporary haul roads, the temporary package WWTP and the temporary laydown area (which they said would extend over the site of the kitchen garden) which would be surfaced with an impermeable surface with associated drainage. They also said that it would be necessary to reduce ground levels by several metres and did not intend to reinstate these. Concern was expressed by those attending regarding potential flooding of the temporary works and Essential Setting by the sea. HNP should supply further details on the change in levels proposed within the Essential Setting and how these relate to the Valley Garden, Kitchen Garden and Mean High Water Spring sea levels (see Q2.6.6 below).

ExA Ref.	Question	Horizon's Response to Question	Comment
	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 surfaced during the construction period and the temporary surface removed at the end of construction. 7) The location and specification of boundary fences during construction on Dwg 60PO80AS _ Q6.0.17_ 01b illustrative main construction activities. 8) The intention for HLT2 - Cestyll Garden - Kitchen Garden and former site of Cestyll House during the operational phase.	Figure 6-3 in the Landscape and Habitat Management Strategy [REP2-039]. It would be correct to note that the earthworks for Mound E do not extend to the area shown on the plans provided in response to Q6.0.17. 2) The reference to sympathetically managed agricultural grassland has been superseded by the developments to the LHMS (an updated version of which has been submitted at Deadline 5) and the update to WN0902-HZDCO-LFM-DRG-00005 – Reference Point 5 Operation (also updated and submitted at Deadline 5) which refer to Coarse Sward Species Rich Grassland. This is also reflected in the changes to Figure 6-19 in the LHMS. Figure 6-18 reflects the change in land use (the purpose of the illustration in this figure) required to achieve the development of that habitat i.e. from agricultural grassland to grazing land managed primarily for biodiversity. 3) The historic access to Cestyll Garden would be removed by construction. The indicative route of the replacement access to the valley garden during construction is shown on Drawing Number 60PO80AS _Q6.0.17_01b. As shown on Drawing Number 60PO80AS _Q6.0.17_02 this access would also be used during operation. The loss of the historic access would contribute to the effect on Cestyll Garden presented in chapter D11 (cultural heritage) [APP-130]; during construction to significance of residual effect was predicted to be major adverse and during operation the significance of residual effect was also predicted to be major adverse. 4) With respect to access for National Trust to the east of Cestyll Garden, a revised Rights of Way drawing will be submitted at Deadline 6 showing extension of the proposed private means of access to include land to the east of Cestyll Garden. This will be an update to WN0902-HZDCO-ROW-DRG-00020, shown in Wylfa Newydd Project – 2.4 – Rights of Way Plans [REP2-016]. 5) and 10) There would be broadleaf/mixed woodland planted as part of the final landscape scheme within the Wylfa Newydd Development Area. This is shown on 60PO80AS _ Q6.0.17_ 02 and would contribute to mitigation of views of the operational site for residents of Felin Gafnan Farmhouse. During construction, the existing shelter belt planting to the east of Cestyll Garden would continue to provide visual screening. The areas within the Wylfa Newydd Development Area are likely to require localised temporary construction works,	

ExA Ref.	Question	Horizon's Response to Question	Comment
	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.	detailed design and development of which would occur throughout Main Construction in accordance with the key controls including the Wylfa Newydd Code of Construction Practice. As such these areas would be likely to experience disturbance that would not allow the establishment of early planting referred to by National Trust in REP3-056.	
	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.	6) With respect to the areas of site clearance and laydown / other construction activities, this is expanded further below with reference to ES Volume D - WNDA Development D1 - Proposed development [APP-120]. The area shown as 'Site clearance' on 60PO80AS _ Q6.0.17_ 01b represents the activities described from paragraph 1.6.78 onwards in D1 [APP-120]. These include demolition of walls and buildings, tree and hedgerow removal and clearance of other vegetation.	
		The area shown as 'Laydown / other construction activities' on 60PO80AS _ Q6.0.17_ 01b is required to provide a working area including for construction of access to the western breakwater. Access for the construction of the breakwater would be facilitated by the construction of haul roads. Haul roads would be constructed of crushed stone and would be capped as soon as reasonably practicable with suitable materials and techniques, which would have a lower potential for emitting dust, noise and vibration than unsurfaced haul roads. This temporary surface would be removed prior to landscaping at the end of Main Construction.	
		A temporary causeway would be constructed to create a haul road (wide enough for two vehicles to pass) between the land and the southern end of the western breakwater. The installation and removal is described in further detail in paragraphs 1.7.47 to 1.7.53 of D1 [APP-120].	
		Other construction activities during main construction include the location and use of a sewage packet plant and discharge. This is further described in paragraph 1.9.57 and 1.9.58 of D1 [APP-120].	
		7) ES Volume D1 [APP-120] describes further details on fencing during Main Construction. The Wylfa Newydd Development Area would be installed with perimeter fencing and this fencing would comprise both temporary construction fencing measuring 2m in height and temporary internal boundary fencing measuring 0.9m in height. The key construction areas	

ExA Ref.	Question	Horizon's Response to Question	Comment
		would be enclosed by the temporary construction fencing, with the temporary internal boundary fencing used to demarcate the extent of the area within which work would be undertaken and to mark the extent of buffer zones. 8) As noted in Horizon's Response to Written Representation - Welsh Government [REP3- 034] due to the operational requirements of the Power Station it is unlikely that the kitchen garden can be reinstated at its former location. However, Horizon are reviewing what can be practicably achieved, and will provide a response at Deadline 6 (19 February 2019). 9) The dashed line referred to in paragraph 12 of REP3-056 is the Power Station Site boundary, shown on the key for the drawings submitted in response to Q6.0.17. At the point where line runs from the southernmost tip of Cestyll Garden, the Power Station Site boundary meets the Wylfa Newydd Development Area shown in blue.	
Q2.6.2	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]:	1) While Horizon has been in discussions with the NDA with regard to purchasing the valley garden, it will not be possible to complete the purchase of the valley garden before the end of examination. Horizon has therefore revised the draft DCO s.106 agreement as detailed below:	• Cestyll Garden CMP – the commitment to provide a CMP is welcomed, but again does not provide the detail that is required to provide comfort that the recommended measures will be appropriate or sufficient to adequately mitigate any effect. The commitment to the use of 'reasonable endeavours' is extremely weak given the strength of the policy requirement to avoid substantial harm to designated heritage assets in NPS and consequently brings into question whether this requirement can be adequately secured to provide any mitigating effect. HNP's statement that it is reviewing what can be achieved regarding the restoration of the Kitchen Garden is welcomed by IACC. However, there is still insufficient information on what is proposed for the restoration of the Kitchen Garden and no justification for Mound D encroaching on the original driveway. • Felin Gafnan –The concern here is that an 'information board scheme' would not provide any meaningful mitigation outwith a detailed and integrated plan to provide mitigation through a) construction methods b) landscape scale mitigation c) archaeological recording and d) commitments to monitor, identify and make good any damage, and it is likely that this could not be achieved outwith a wider conservation management plan. The concern here is that various commitments are being made in different places and that it is increasingly difficult to keep up with what is actually being proposed – a signposting document would be a useful first step. The S.106 Schedule 11 submitted at deadline 5 now provides a commitment to make good any damage to the structure, in so much it would cover the owner's repair costs. Whilst this is a back-stop, the correct approach is to look at mitigation to prevent damage in the first place. • Mound D – in order to claim that the benefits of Mound D offset the harm to Cestyll Garden, it is surely

			necessary to explain how the specific landscape of Cestyll has been considered in developing the specific design of Mound D, as it appears that this mound has been superimposed on the historic landscape with no real attempt to respond to the valued historic character of this area.
	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) 2) The proposed a deed of covenant with NDC to develop and deliver a Conservation Management Plan for Cestyll Garden and	5.1.1 <i>If the Developer owns Cestyll Garden, it will develop and thereafter implement a conservation management plan by Implementation.</i> 5.1.2 <i>If the Developer does not own Cestyll Garden, it will use reasonable endeavours to work with the landowner to develop and implement a conservation management plan by the first anniversary of Implementation, and will fund that up to a maximum of £750,000 (Indexed).</i> 5.1.3 <i>If despite using reasonable endeavours it has not been possible to achieve [5.1.1] by Implementation or [5.1.2] by the first anniversary of Implementation, then the Developer will allocate a financial contribution of £750,000 (Indexed) to the Council, for spending in consultation with Cadw, on enhancing other heritage assets in the vicinity of the WNDA.</i>	

ExA Ref.	Question	Horizon's Response to Question	Comment
	whether agreement on heads of terms for acquisition of a number of land interests, including Cestyll Garden, has been reached. 3) The proposed provision of enhanced interpretation in the form of an additional interpretation board at Felin Gafnan. 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. 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 mechanism to ensure the work would be carried out in accordance with Cadw and IACC guidance: i. Grade II* Listed Felin Gafnan Corn Mill (Porth y Felin) (Asset 137); ii. Grade II Listed Corn-drying house at Felin Gafnan (Asset 141); iii. Grade II Listed Mill house at Felin Gafnan, Cylch-y-Garn (Asset 144); and iv. Grade II* Church of St Padrig (Llanbadrig) (Asset 26)	5.1.4 <i>The conservation management plan will:</i> a) <i>set out required restoration works for Cestyll Garden;</i> b) <i>require installation of interpretation boards;</i> c) <i>establish a programme of maintenance for the duration of the construction period to the end of the Operational Period.</i> d) <i>require and establish improvements to public access of Cestyll Garden.</i> These clauses were shared with IACC and the Welsh Government on the 23 January 2019, and will be included in the revised draft DCO s.106 agreement which will be submitted at Deadline 6 (19 February 2019). 2) See 1) above. 3) The following clauses are included in the revised draft DCO s.106 agreement which will be submitted at Deadline 6 (19 February 2019): 7. Felin Gafnan 7.1 <i>The Felin Gafnan Interpretation Board Contribution will be paid by the Developer to the Council for onward payment to National Trust prior to Implementation and the Developer covenants that it will not Implement the Wylfa Newydd DCO Project until this contribution has been paid.</i> 7.2 <i>The Council will require National Trust to apply the Felin Gafnan Interpretation Board Contribution to [providing/improving] interpretation boards at the Felin Gafnan Corn Mill, Mill House at Felin Gafnan, and the Corn-drying House at Felin Gafnan prior to the first anniversary of Implementation.</i> These principles were shared with IACC and the Welsh Government on the 23 January 2019. 4) As noted in Horizon's Response to Written Representation - Welsh Government [REP3-034] due to the operational requirements of the Power Station it is unlikely that	

ExA Ref.	Question	Horizon's Response to Question	Comment
		the kitchen garden can be reinstated at its former location. However, Horizon are reviewing what can be practicably achieved, and will provide a response at Deadline 6 (19 February 2019). In addition, and as noted in Horizon's response to Interested Parties responses to the Examining Authority's First Round Written Questions [REP3-005], it is Horizon's view that the adverse effects on the Cestyll Garden need to be balanced against the function of Mound D which, as identified in paragraph 6.3.18 of the Landscape and Habitat Management Strategy [APP-424] include: • Helping to protect views into the site from the south which would include the spent fuel storage area; • Softening views of the Power Station Site from the west and south-west, including views from existing PRoWs and diverted Wales Coast Path; • Providing screen mitigation up to a height of approximately 8m above existing ground level. 5) The following clause will be included in the revised draft DCO s.106 submitted at Deadline 6 (19 February 2019): <i>7.3 In the event that the undertaking of the Wylfa Newydd DCO Project causes structural damage Felin Gafnan Corn Mill, Mill House at Felin Gafnan, and the Corn-drying House at Felin Gafnan ("properties"), the Developer will meet the owner of properties' reasonable costs of making repairs.</i> The need for and nature of the repair works will be informed by dilapidation surveys of the properties which will be undertaken by Horizon prior to the start of construction and after the completion of construction. The dilapidation surveys will be secured by inclusion in the Main Power Station Site sub-CoCP, submitted at Deadline 5 (12 February 2019).	

ExA Ref.	Question	Horizon's Response to Question	Comment
		As stated under clause 7.3 while Horizon will meet the owner of properties' reasonable costs of making repairs, it will remain the responsibility of the owner to ensure that the repair work is carried out in accordance with Cadw and IACC guidance and all statutory requirements. Please note that as it is located approximately 1.2km to the northwest of the WNDA no structural damage to Grade II* Church of St Padrig (Llanbadrig) (Asset 26) is predicted and therefore this historic building has not been included under principle 7.3. in the DCO s106.	
Q2.6.4	Respond to the submission by the Welsh Historic Garden Trust [AS-037] or direct the ExA to any previous response. The Welsh Historic Garden Trust's Relevant Representation [AS-037] raises the following issues: 1) The effects of airborne pollution during construction which could have a detrimental effect upon the planting in the Valley Garden. 2) The consequences of potentially destabilising vibration during construction, these effects may take years to show, especially with regards to the health of mature trees. 3) The proposed redirection of ground water into the Afon Cafnan and through the Valley Garden, this, in times of heavy rainfall could cause potentially catastrophic erosion of the planting and banks of the stream	1) The effect of airborne pollution upon the vegetation within Cestyll Garden was assessed in chapter D11 [APP-130] of the Environmental Statement. Subsequent to the DCO application, additional mitigation to reduce oxide of nitrogen (NOx) emissions from construction plant, machinery and marine vessels was specified and was included in the updated Main Power Station Site sub-CoCP (an updated version of which has been submitted at Deadline 5 (12 February 2019)) and Marine Works sub-CoCP (an updated version of which has been submitted at Deadline 5 (12 February 2019)). The mitigation comprised a commitment to 90% of non-road mobile machinery meeting the EU Stage IV emission standards and also marine vessels involved in the Marine Works to meet the International Maritime Organisation Tier III NOx emission limit. The effect of applying these mitigation measures was modelled and reported in the Air Quality Mitigation Quantification Report [REP3-052] submitted at Deadline 3 and showed that predicted NOx concentrations at Cestyll Garden were below the criteria for indicating potential damage to vegetation. The nitrogen and acid deposition rates were approximately 70% lower than those originally assessed in chapter D11 [APP-130]. It was concluded in the Air Quality Mitigation Quantification Report [REP3-052] that the potential for significant effects to the vegetation from the lower nitrogen and acid deposition rates with the additional mitigation in place was extremely limited. Furthermore, soil pH monitoring and visual inspection of the condition of the plants at Cestyll Garden is proposed to be undertaken during construction, as set out in the Main Power Station Site sub-CoCP [(an updated version of which has been submitted at Deadline 5 (12 February 2019)). Due to the presence of nationally designated ecological sites within or close to the Wylfa Newydd	HNP has answered the queries raised by the Welsh Gardens Trust by reference to existing information, so no new information provided and our positions on Cestyll Garden and Dame Sylvia Crowe's landscape do not change. IACC has the following comments to make: • The response does not address vibration effects on trees • Flows in the Afon Cestyll – Reduced flow suggests a potential change in the character of the garden, its noise environment and the water environment that supports the specific planting scheme. An increase in flood flows over a baseline of reduced normal flows is suggestive of the potential for erosive damage. A clear qualitative description of this changed water environment is needed to make an informed judgement. Horizon present a short analysis of changes to peak velocity during the 0.1% AEP flood event. This is not an acceptable approach. The 0.1% is an unlikely and extreme event, and if it did indeed occur some erosion would be expected with or without the groundwater dewatering discharge. Typically the 50% AEP event is considered to represent the 'formative' discharge of a natural channel, changes in flow rates due to additional groundwater discharge should be related to this, to ascertain changes in the percentage of the time that this flow event occurs. This should be ground-truthed against the channel through the gardens to confirm a) if the channel is vulnerable to erosion (if entirely bedrock/boulder/masonry, then erosion risk will be limited), b) channel dimensions and capacity to confirm the point at which excess flow could have negative effects (damage/erosion of vulnerable garden features – footbridge, flower/planting beds). If judged against this, a significant change is apparent, commitments to cease discharges during periods of high flow should be made. It should be noted, that at times of dry weather and low flows, the addition of the groundwater dewatering discharge (at an appropriate rate) may in fact be beneficial, since the associated higher velocity flow will prevent siltation.

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			• The response concludes a major effect but rather glosses over the fact that the breakwaters will be very visually intrusive at all stages. IACC is concerned that a 10-year construction duration is regarded as ‘short-term’ thereby attempting to reduce in magnitude what are genuinely concerning effects. • The viability of the shelter belt – Horizon seem to be considering this as part of an air quality issue whereas it appears to be a request by WHGT for screening planting. IACC would prefer to see the commitment to and design of any planting justified within the remit of Conservation Management Plan. • IACC welcome’s clarification regarding the valuation of the kitchen garden.
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ExA Ref.	Question	Horizon's Response to Question	Comment
	running through the Valley Garden. 4) The effect upon the seaward view during and after construction, especially the industrial nature of the proposed breakwater which will dominate this, the essential view from the Valley Garden. 5) The viability of the existing shelter- belt on the eastern side of the Valley Garden and the necessity of augmenting it immediately, for it to have any mitigatory effect during the construction of Wylfa Newydd. 6) The Kitchen Garden has been assessed as of low significance in itself but its position as part of a designed landscape is particularly significant. The Kitchen Garden has already been damaged during initial clearance phases so any mitigation in the form of reconstruction would enhance the relevance of the Valley Garden and increase the cohesion of the garden as a whole. 7) The assessment of the value of Dame Sylvia Crowe's Landscape Design.	Development Area (i.e. Tre'r Gof SSSI and Cae Gwyn SSSI), a comprehensive suite of dust prevention and control measures will be put in place during construction to control dust emissions at source (see assessment set out in appendix D5-1 [APP- 139] of the Environmental Statement). This also includes a detailed monitoring strategy with continuous monitoring of particulates and dust deposition monitoring at several locations around the Wylfa Newydd Development Area (one location close to Cestyll Garden), use of trigger values to initiate investigation and action on site to identify and mitigate potential dust issues. With these good practice mitigation measures in place, the effect due to dust emissions was concluded to be not significant (see chapter D5 [APP-124] of the Environmental Statement). 2) The following clauses will be included in the draft DCO s.106 agreement which will submitted at Deadline 6 (19 February 2019): 5.1.5 <i>If the Developer owns Cestyll Garden, it will develop and thereafter implement a conservation management plan by Implementation.</i> 5.1.6 <i>If the Developer does not own Cestyll Garden, it will use reasonable endeavours to work with the landowner to develop and implement a conservation management plan by the first anniversary of Implementation, and will fund that up to a maximum of £750,000 (Indexed).</i> 5.1.7 <i>If despite using reasonable endeavours it has not been possible to achieve [5.1.1] by Implementation or [5.1.2] by the first anniversary of Implementation, then the Developer will allocate a financial contribution of £750,000 (Indexed) to the Council, for spending in consultation with Cadw, on enhancing other heritage assets in the vicinity of the WNDA.</i> 5.1.8 <i>The conservation management plan will:</i> <i>e) set out required restoration works for Cestyll Garden;</i> <i>f) require installation of interpretation boards;</i> <i>g) establish a programme of maintenance for the duration of the construction period to the end of the Operational Period.</i>	

ExA Ref.	Question	Horizon's Response to Question	Comment
		<i>h) require and establish improvements to public access of Cestyll Garden.</i> Should vibration result in effects to mature trees, this would be made good by the programme of maintenance for the duration of the construction period to the end of the Operational Period identified in 5.1.4 c) above. 3) The Flood Consequence Assessment [APP-150] states (at paragraph 8.3.8): "The groundwater pumped from the main excavations would be pumped to a sedimentation pond to be treated prior to being discharged to the sea at Porthy-pistyll. This would not increase the flood risk off-site, therefore, the risk of the pumped groundwater to receptors is negligible with the resulting significance of effect and flood risk from this source also considered negligible." The only activity which would result in groundwater being redirected to the Afon Cafnan is from the dewatering of the coffer dammed areas to maintain a dry working area. The water would consist of rainfall plus seawater and groundwater seepages and would be discharged at surface water drainage outfall point(s) at the Afon Cafnan. The volume, and therefore significance, of the groundwater component has been identified in the Construction Water Discharge Activity – Environmental permit application as small and therefore has not been considered further. Chapter D8 of the ES – Surface water and groundwater [APP-127] identifies reduced groundwater baseflow to the Afon Cafnan as a result of the mounding and dewatering during construction and as a result of mounding during operation, such that there will be no erosive effect from changes to groundwater in the Afon Cafnan. An increase in flood flows is predicted as a results of a higher runoff rate and more rapid response. The scale of velocity increases with flood risk across all scenarios modelled (2020's, 2080s, 2180s, pluvial, fluvial etc) amounts to +0.096m/s, which is for an extreme 0.1% AEP event. This amounts to a 7.9% increase in average velocity, which would not result in catastrophic erosion as the bulk of the change would be in the centre of the water column where velocities are highest. Please refer to Appendix D8-7 – surface water and ground water modelling results (Part 1 of 7) [APP-160] for more information on the results of surface and ground water modelling.	

ExA Ref.	Question	Horizon's Response to Question	Comment
		4) As stated in paragraph 11.5.39 of chapter D11 (Cultural heritage) of the ES [APP-130] during construction the breakwaters would be dominant and incongruous in the Significant View from the valley garden. The magnitude of these short-term effects has been assessed to be large and the significance of effect has been assessed to be major adverse. In paragraph 11.5.54 of chapter D11 and illustrated by the photomontage from Viewpoint 15 (see appendix D10-8 [APP-199]) the breakwater would be a continued presence in the Significant View from the valley garden during operation. The magnitude of this effect was assessed to be large and the significance of effect to be major adverse. 5) The air quality mitigation referred to in the response to point 1 above is focussed on preventing or reducing emissions of air pollutants and dust at source. No reliance has been placed on the potential mitigatory effect of the belt of trees on the eastern side of the valley garden to reduce adverse air quality effects at Cestyll Garden. The assessments set out in chapter D5 [APP-124] and the Air Quality Mitigation Quantification Report [REP3-052] concluded that the mitigation of emissions at source and the related monitoring and management of pollution and dust emissions were sufficient to reduce air quality effects to not significant at sensitive ecological sites, and this is also likely to be same for vegetation in the valley garden. Thus while the existing belt of coniferous trees on the eastern edge of the valley garden would also have some mitigatory effect, particularly with regard to capturing dust and particles emitted from construction activities on the tree foliage, further reducing the potential for significant adverse air quality effects to the plant species within Cestyll Garden, it is not required to enable the mitigation described above to be effective. Consequently, further augmentation of the belt of trees is not considered to be required.	

ExA Ref.	Question	Horizon's Response to Question	Comment
		6) As presented in chapter D11 (Cultural heritage) Horizon took Cestyll Garden to comprise the whole of the Essential Setting, the valley garden, the kitchen garden and site of Cestyll House and the trackway that follows the former access to Cestyll House (see figures D11-20 and D11-21 [APP-237 and APP-238]). While the contribution made by these elements to the value of the Cestyll Garden may vary (see Wylfa Newydd Proposed New Nuclear Power Station Assessment of the significance of Cestyll (Grade II) Registered Historic Park and Gardens Final Report [APP-211]), for the purposes of assessment the whole of the garden shown on figures D11-20 and D11-21 was assessed to be of high value. This is reflected in the assessment of the unmitigated and the residual significance of effect presented in chapter D11 (major adverse during construction and operation, moderate adverse during decommissioning). Regarding restoration, due to the operational requirements of the Power Station it is unlikely that the kitchen garden can be reinstated at its former location. However, Horizon are reviewing what can be practicably achieved, and will provide a response at Deadline 6 (19 February 2019). 7) Horizon note the Welsh Historic Gardens Trust's comments regarding the assessment of value of Dame Sylvia Crowe's Landscape Design. Horizon's rationale for the assessment of significance of Dame Sylvia Crowe's Landscape Design is presented in Appendix D11-5 [APP-212], Horizon maintain that the assessment of medium value for Dame Sylvia Crowe's Landscaping is appropriate. As identified in paragraphs 11.5.41 to 11.5.42 of chapter D11 (Cultural heritage) [APP-130], construction would result in the removal of areas of woodland located to the south-east of the southern landscape mound of Dame Sylvia Crowe's Landscaping Area (HLT 3; medium value) and to the south of Existing Power Station. The magnitude of these permanent effects has been assessed to be medium and the significance of effect has been assessed to be moderate adverse. The measures to	

ExA Ref.	Question	Horizon's Response to Question	Comment
		mitigate the effects on Dame Sylvia Crowe's landscaping are presented in section 11.6 of chapter D11. The mitigation for Dame Sylvia Crowe's landscaping comprise a Level 2 Historic Landscape survey and photographic survey secured through the Main Power Station Site sub-CoCP (an updated version of which has been submitted at Deadline 5 (12 February 2019)). After mitigation, the residual significance of this effect was assessed to be minor adverse. As stated in paragraph 11.5.55 of chapter D11 [APP-130], the Power Station and new landscaping and woodland planting would form dominant elements key views of Dame Sylvia Crowe's Landscape. The magnitude of this medium-term effect has been assessed to be medium and the significance of effect to be moderate adverse. No additional mitigation is proposed during operation and so the significance of residual effect during operation has been assessed to be moderate adverse.	

ExA Ref.	Question	Horizon's Response to Question	Comment
Q2.6.5	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?	Horizon will include a requirement in the DCO that prior to the commencement of the Power Station Works, a Cultural Heritage Mitigation Scheme for the WNDA will be submitted to and approved by IACC, in consultation with Cadw/GAPS. As such the Cultural Heritage Mitigation Scheme will be submitted post-consent of the DCO and prior to the start of construction.	IACCs position is that the Cultural Heritage Mitigation Strategy should be provided as part of the Examination process in order to allow review by Interested Parties.
Q2.6.6	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)	Horizon is currently considering further comments from key stakeholders on this matter. Given that discussions are ongoing and that the design detail is evolving Horizon will submit the requested information later in examination.	IACC would welcome clarification as to when HNP will be able to provide the cross section drawings requested by the Panel. IACC in particular considers that HNP should be able to provide the worst case sections as this is already stated in the parameters. These should include both construction phase and post-construction/operational information and include the information requested by IACC in Q2.6.1 above.

ExA Ref.	Question	Horizon's Response to Question	Comment
Q2.7.2	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]. 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.	Horizon are not currently in a position to provide drawings and photomontage views of the Power Station colour scheme. This is because the detail design of the Power Station has not yet been undertaken and there are technical issues that need to be taken into consideration when selecting appropriate types of finish and colour to be applied to Power Station buildings. There are fewer technical constraints to the application of different colours to ancillary buildings. However, the overall colour composition needs to be developed in conjunction with the largest buildings, including the Reactor Buildings, the colour of which is subject to the development of detailed operations and maintenance strategies. Until these decisions are made, Horizon are unable to commit to a specific colour scheme.	It should be perfectly feasible for HNP to provide photomontages that illustrate the Design Principles in the DAS, even if these are “illustrative” at this stage. IACCs position is that such provision would be highly beneficial in allowing verification of the visual and landscape role that the implementation of the colour palette will have at some viewpoints i.e. on some visual receptor groups and, more importantly, upon the AONB. It is not clear in Horizon's response why suitably caveated indicative visualisations could not be provided given the detail on the colour palette and its evolution that is included in the DAS and the level of detail for the main built elements that has been utilised in the photomontages provided in Appendix D10-08 [APP-199]. IACC (and other consultees) will require that visualisations of the adopted colour palette are produced within the detailed design submission when detailed operations and maintenance strategies have been developed and that these can be assessed against the principles set out in the DAS. Horizon's approach as set out in WN3 in the Deadline 5 version of the dDCO [REP5-057] only refers to plans and written details of the design being submitted to and approved by IACC and that these should be in accordance with the principles set out in the DAS. IACC wishes to amend WN3 (1) to specifically include for the provision of visualisations by Horizon to illustrate the implementation of the principles set out in the DAS in a form and at representative and illustrative viewpoint locations (as defined in the LVIA and shown in Appendices D10-04 and D10-05) to be agreed with IACC.

ExA Ref.	Question	Horizon's Response to Question	Comment
Q2.7.3	Explain how the following overarching landscape design and mitigation principles set out in the Landscape and Habitat Management Strategy [REP2-039] and 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? < “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.”	Draft Development Consent Order (an updated version of which has been submitted at Deadline 5 (12 February 2019)) requirement WN9 states that <i>“the final landscape and habitat scheme ... must be prepared in accordance with the overarching and operational principles in Chapter 4 of the LHMS, and the Wylfa Newydd Development Area Retention Plans.”</i> The Landscape and Habitat Management Strategy (an updated version of which has been submitted at Deadline 5 (12 February 2019)) will therefore provide the primary source of guidance for Horizon to develop the detailed landscape design of the new landscape setting for the Power Station on the Wylfa Newydd Development Area, excluding the Power Station Site. Design principles for the Power Station Site are set out separately in volume 2 of the Design and Access Statement (Power Station Site) (Rev 3.0) [REP4-017]. The indicative landscape design shown on the reference point 5 drawing in appendix B of the Landscape and Habitat Management Strategy (an updated version of which has been submitted at Deadline 5 (12 February 2019)) illustrates the balance between open land for grazing and woodland. A further overarching principle in section 4.1 explains that the design intention for landscape mounding should <i>“generally reflect the local drumlin landscape heights, shapes and slope profiles”</i>. The detailed design of landscape mounding will be based on the indicative heights and cross sections shown in the Landscape and Habitat Management Strategy on figures 6-6, 6-7, 6-8, 6-9, 6-10 and 6-11a. The photomontage views in appendix D10-8 of the DCO ES (photomontage views) [APP- 199], which have been based on this indicative design, illustrate to varying degrees how large-scale landscape mounding and woodland planting will help soften views from the Isle of Anglesey Area of Outstanding Natural Beauty (AONB) and North Anglesey Heritage Coast from a range of representative viewpoints at year 1 and year 15 of operation. Relevant photomontage views comprise those from Viewpoints 2, 11 and 29 (views from the east), Viewpoints 7, 9, 15, 19, 24, 25, 27, 28 and K (views from the west). The reference point 5 drawing shows the proposed naturalistic landscape extending right up to the boundary of the Power Station Site. Horizon will have regard to these representative viewpoints, as well as the design principles in the Landscape and Habitat Management Strategy when developing the landscape design. Horizon will also have regard to the detailed description and assessment of visual effects	IACC is content that the LHMS (Revision 2.0) illustrates a proposed landscape setting for the new power station that reflects the existing open, rolling drumlin landscape. The principles and outline designs set out in the LHMS (and the DAS although it is not referenced in the response) would be developed in detail designs as specified under WN9 in the dDCO. IACC welcomes HNPs commitment to consult IACC further in the development of the detailed landscape and habitat schemes prior to submission to IACC for approval. IACC would want to be consulted upon the scope of plans and cross sections to be submitted. Consideration should also be given to including a requirement for Horizon to provide visualisations of the detailed designs from a selection of the same viewpoints from which photomontage visualisations have been produced in the DCO process i.e. close to sensitive visual receptors using WCP and in communities and within AONB and Heritage Coast. This would allow IACC and other consultees to review detailed designs against the outline designs that were available during the DCO process.

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		from the above representative viewpoints, as set out in appendix D10-7 of the DCO ES (visual effects schedule) [APP-198], to ensure the effectiveness of the proposed mitigation. The Draft Development Consent Order (an updated version of which has been submitted at Deadline 5 (12 February 2019)) includes requirement WN9 which states that <i>“a final landscape and habitat scheme for the WND A during the operational phase of the authorised development must be submitted to IACC for approval.”</i> Subsequent to the Development Consent Order, Horizon would consult further with the IACC on development of the final landscape and habitat scheme prior to submitting for approval. It is anticipated that the submission would include detailed plans and cross sections at scales to be agreed with the IACC. Details of landscape mounding will include heights, profiles, and materials; Soft landscape details to be submitted to IACC for approval will include species, size, density and provenance of plant material, specification for soil preparation, planting and seeding; Hard landscape details will include the layout and specifications for all hard surfacing, boundary treatments and external furniture.	
Q2.7.4	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.	The Overarching National Planning Policy Statement for Energy (EN-1) (paragraph 5.9.9) requires that the statutory purpose of AONBs be given due regard and that conservation of the natural beauty of AONB landscapes should be given substantial weight in deciding applications for development consent. However, EN-1 also makes provision for grant of development consent within designated areas including AONBs in exceptional circumstances (paragraph 5.9.10), requiring an assessment of any detrimental effect on the environment including landscape and the extent to which such effects could be moderated. The Planning Statement [APP-406] demonstrates that the requirement of exceptional circumstances is met in respect of the Wylfa Newydd DCO Project, in accordance with Paragraph 5.9.10 of EN-1 (see, in particular, paragraph 6.4.265). In such circumstances, EN-1 requires projects consented in AONBs to be carried out to high environmental standards (paragraph 5.9.11). In this respect, Horizon has had regard to the Isle of Anglesey AONB Management Plan, as set out in the Landscape and Habitat Management Strategy, and in accordance with Policy AMG 1 of the JLDP.	IACC is still of the opinion that operational impacts on parts of the AONB that are local to the Project are greater than predicted by HNP and that various compensatory landscape and recreational improvements should be undertaken within the AONB to ensure that the designation is not compromised in these locations. This is supported by EN-1 in the section on Landscape and Visual Mitigation (paras 5.9.21 – 5.9.23) which states that, in addition to mitigation measures incorporated into the development “it may appropriate to undertake landscaping off site”. The Council considers that there remains scope for other mitigation/compensation habitat management in these and other locations within the AONB.

ExA Ref.	Question	Horizon's Response to Question	Comment
	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? Is a more positive response to NPS-EN1 paras 5.99 to 5.9.11 required?	EN-1 confirms that the duty to have regard to the purposes of AONBs also applies when considering developments outside the boundaries of the designation that could have impacts within the designation and that "The aim should be to avoid compromising the purposes of designation and such projects should be designed sensitively given the various siting, operational, and other relevant constraints" (paragraph 5.9.12). However, EN-1 also confirms that "the fact that a proposed project will be visible from within a designated area should not in itself be a reason for refusing consent" (paragraph 5.9.13). Compliance with these policies is demonstrated comprehensively in Horizon's response to FWQ 7.0.4 [REP2-375] in terms of how the Wylfa Newydd Project avoids compromising the purposes of the AONB designation, and is designed sensitively given the various siting, operational, and other relevant constraints. Horizon confirms that the landscape impact assessment in chapter D10 of the DCO ES (landscape and visual) [APP-129] has taken into consideration the national importance of the AONB; This is reflected in the assessment of high sensitivity to change for the landscape character of the AONB and in the extensive mitigation measures proposed for the Wylfa Newydd Development Area, including those set out in the Landscape and Habitat Management Strategy (Rev 2.0) [REP2-039]. Draft Development Consent Order (Rev 3.0) [REP2-020] requirement WN9 states that <i>"the final landscape and habitat scheme ... must be prepared in accordance with the overarching and operational principles in Chapter 4 of the LHMS, and the Wylfa Newydd Development Area Retention Plans."</i> Horizon note NRW's view that <i>"opportunities are required off-site within the AONB to mitigate/compensate for significant visual effects."</i> Paragraph 7.19.6 of the NRW Written Representation (WR) [REP2-325] cross refers to paragraph 7.19.3, which identifies where the main areas of visual effects are predicted to occur. These effects include the temporary construction effects, for which off-site screen planting would not be practical within the construction timescale. Paragraph 7.19.3 identifies that <i>"the most notable locations of public interest within the AONB to be affected would include Mynydd Y Garn, Cemlyn Bay, Porth Y Pistyll and Porth Padrig... linked by the Wales Coastal Path"</i>. As explained in Horizon's response [REP3-035] to the NRW WR at Deadline 2, it is considered that <i>"...in general landscape and visual mitigation is most effectively provided 'at source'. This is because measures within the Wylfa Newydd Development Area will mitigate</i>	

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		<i>landscape and visual effects on a broad range of surrounding locations and viewpoints, and there is adequate space to provide meaningful mitigation, for example, through extensive landscape mounding and planting. By contrast off-site mitigation tends to provide mitigation for a specific location, receptor or viewpoint. It is also noted that off-site mitigation requires either control of the land concerned or agreement of the landowner.</i>" Off-site measures cannot therefore be relied upon to deliver effective mitigation, which is why Horizon have focussed attention on providing mitigation on-site for deliverability. Views from Myndd y Garn are elevated and it would not be practical to screen views due to the angle of view, as shown in the photomontage for Viewpoint 7 in appendix D10-8 of the DCO ES (photomontage views) [APP-199]. Furthermore, any screen planting is likely to obstruct the expansive open views towards the north coast of Anglesey, a special quality of the AONB, and be impractical in conjunction with the characteristic mosaic of rock outcrops, scrub and pasture. Similarly, a key characteristic of Cemlyn Bay and Porth-y-Pistyll are the expansive open coastal views and any screen planting is therefore likely to obstruct valued views and be out of character with the open nature of the seascape character, as evident from photomontage for Viewpoints 25 and 27 in appendix D10-8 of the DCO ES [APP-199] from the Wales Coast Path. Similar issues apply to views from Porth Padric, slightly further away at approximately 2km from the Power Station. The photomontages for Viewpoint 11 from the Wales Coast Path at Llanbadrig Point in appendix D10-8 of the DCO ES [APP-199] illustrates how on-site landscape mitigation would be provided during year 1 and year 15 of operation. However, it should be noted that the additional mitigation measure to apply a natural colour scheme to the Power Station to help integrate the buildings into the landscape is not shown. This measure is explained further in design principle 31, in Volume 2 of the Design and Access Statement [REP4-017], <i>"a palette based on natural colours found in the landscape or seascape setting will be developed for the Power Station buildings where this is compatible with operational and safety requirements ... using a similar approach to that used for the Existing Power Station."</i> The photomontage for Viewpoint 11 also demonstrates that the introduction of planting to screen views would obstruct valued off-shore views and be out of	

ExA Ref.	Question	Horizon's Response to Question	Comment
		keeping with the open seascape character of Llanbadrig Point. For the reasons set out above, Horizon therefore maintain that mitigation in relation to the AONB will be most effectively delivered 'at source', on-site, within the Wylfa Newydd Development Area. This is also considered in keeping with protecting the expansive views of the AONB, one of the defined special qualities of the Isle of Anglesey AONB. Furthermore, Horizon consider that the assessment provided in chapter D10 of the DCO ES [APP-129] and extensive mitigation measures represent a positive response which is in compliance with NPS EN-1 paras 5.9.9 to 5.9.11.	
Q2.7.5	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]. The ExA would find visualisations of the construction phase helpful in understanding its landscape and visual impacts and the mitigation that is required and ask that these be submitted at Deadline 6.	Illustrative construction visualisations have been prepared to address comments received from the Isle of Anglesey County Council (IACC) in their response to the ExA's FWQ 7.0.5 [REP2-153] and will be submitted at Deadline 6. The purpose of the illustrative construction visualisations is to provide an indication of how the Wylfa Newydd Development Area may appear during Main Construction of the Power Station. However, as the positions of plant, cranes, temporary buildings and structures, as well as the extent of construction, will vary throughout the period, the illustrative visualisations can only be indicative. Illustrations are based upon construction within all parts of the site happening concurrently to illustrate the worst case scenario at the peak of construction activity. However, in reality construction activities would take place incrementally and the actual visual impact at any given time is therefore likely to be less than that illustrated. Proposed mitigation measures during Main Construction are described in chapter D10 of the DCO ES (landscape and visual) [APP-129] and secured by the Wylfa Newydd Code of Construction Practice (CoCP) (an updated version of which has been submitted at Deadline 5 (12 February 2019)) and Main Power Station Site sub-CoCP (an updated version of which has been submitted at Deadline 5 (12 February 2019)). Key measures proposed to mitigate visual impact arising from construction include: Phased implementation of landscape mounding, seeding of pasture and woodland planting to include early creation of the outer slopes of the linear landscaped mound adjacent to Tregele, and landscape mounding on the edge of Cemaes.	IACC will comment on the additional visualisations when these are received at Deadline 6. The indicative nature of the forthcoming visualisations is acknowledged. IACC's position on the construction period visual effects will be reviewed following receipt of these visualisations. Two specific responses to the bullet point responses: Bullet point 1 makes reference to "landscape mounding on the edge of Cemaes" i.e. Mound A and it is not clear if the seeding of pasture and woodland planting refers to Mound A or just proto Mound B's outer face opposite Tregele. All information up to this point implies that such planting and permanent seeding would be limited to the outer face of proto Mound B. Bullet point 4 on enhancements to existing boundary features is a key issue for IAAC as it is the only opportunity to provide limited mitigation for some visual receptors located close to the WNDA boundary, including a section of the temporarily re-routed WCP beyond the screening provided by Mound A and proto Mound B. Horizon have provided only limited information on the landscape elements that will be retained in these boundary areas and the form of the enhancements. It is noted that in the latest version of the dDCO section WN8 – Construction Landscaping is brief and general. Neither WN8 nor the other referenced paragraphs (PW3 and WN2) make any reference to the need for Horizon to submit design details for the construction period boundary landscape works. Details should be submitted to IACC in the same manner as specified for the operation period landscape works.

ExA Ref.	Question	Horizon's Response to Question	Comment
		- Where soils would be stored for longer than 60 days, stockpiles and temporary landscape mounding would be seeded with an appropriate low-maintenance seed mix. - The design of temporary buildings within the site compound and construction/laydown areas through the use of visually recessive colour, finishes and maximum heights. - Enhancements to existing boundary features retained on the Wylfa Newydd Development Area outside the perimeter construction fence. - Visually recessive natural colours and materials used to break down the scale and massing of the Site Campus accommodation blocks and help integrate them into the landscape using a similar approach to colours found within the surrounding landscape and on the Existing Power Station. - Construction lighting would be designed to reduce sky glow, glare and light spill onto sensitive receptors to below thresholds where significant effects are predicted, where practicable.	
Q2.8.3	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?	Horizon does not intend that the details of the VMP will be included in the MWSCoCP, as it requires information which will only be available once Horizon has appointed the Marine Works contractor. Horizon intends that the principles of the VMP will be set out and secured in the MWSCoCP which will be submitted into Examination at Deadline 5 (12 February 2019), and that the full VMP will be approved by NRW under the Marine Licence.	
Q2.8.5	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	Horizon has updated the Biosecurity Risk Assessment Strategy to take account of the additional principles, gaps and revised baselines raised by NRW in its Written Representation [REP2-235]. The updated Biosecurity Risk Assessment Strategy is provided at Deadline 5 (12 February 2019). The securing of these additional principles is within the updated Marine Works Sub-CoCP submitted into Examination at Deadline 5 (12 February 2019). The development of a more	

ExA Ref.	Question	Horizon's Response to Question
	(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 requirements?	detailed marine Biosecurity Risk Assessment, in accordance with the Biosecurity Risk Assessment Strategy and Marine Works Sub-CoCP, will be carried out after the grant of the DCO, and after the Marine Works contractor is appointed by Horizon (in accordance with the Marine Licence consent for which NRW are the discharging authority).
Q2.8.6	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 and actions required to reduce risks around marine INNS. Can the Applicant and NRW agree on the role?	Horizon has provided the below clarification to NRW for the role of the Ecological Clerk of Works and understands that this addresses NRW's initial concern. The Ecological Clerk of Works (who will be a part of Horizon's Environmental Management Team along with other suitably qualified and experienced persons) will ensure that the environmental quality standards and commitments within the DCO and other consents are adhered to during construction and operation. The role will span both the terrestrial and the marine aspects of the Wylfa Newydd Project. Specifically, in relation to the marine environment, the Ecological Clerk of Works and the Environmental Management Team will: • secure adequate controls in the marine environment relating to environmental management and mitigation secured within the DCO, for example those set out in the Wylfa Newydd CoCP, sub-CoCPs and CoOP; and, • ensure compliance with risk assessments, management plans and actions required to reduce risks around marine INNS as set out in section 11 of the Marine Works sub- CoCP, as well as with other post DCO consents.

ExA Ref.	Question	Horizon's Response to Question
Q2.8.7	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?	During the Issue Specific Hearing on Biodiversity on [11 January 2019], clarification was sought on the effect of the Cooling Water discharge on the tidal vectors and velocities. This was also raised NRW's Written Representation [REP2-235, para 7.4.8] and its post hearing submission [REP4-039 para 3.7.6]. In response to this, Horizon has undertaken supplementary modelling to show the impacts of Cooling Water discharge on hydrodynamic processes in the water body. A technical note titled '<i>Effect of cooling water discharge on tidal vectors</i>' will be submitted into Examination at Deadline 5 (12 February 2019) setting out Horizon's position.
Q2.8.8	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?	The impacts from dewatering on Tre'r Gof SSSI identified in the surface water and groundwater chapter [APP-127] have been re-considered following a revision of the Tre'r Gof conceptual groundwater model. The result of this revision will be submitted at Deadline 6 (19 February 2019). Horizon has now made provision for monitoring and mitigation of groundwater around Tre'r Gof should there be any effects on groundwater levels within the revised Main Power Station Site sub-CoCP submitted at Deadline 5 (12 February 2019). The provision includes for appropriate groundwater monitoring and further additional mitigation which could include controlling water loss from the site to avoid drying and oxidation of the peat body, construction methods to reduce groundwater ingress to cooling water tunnel and groundwater recharge. Additional embedded mitigation for lining of the cooling water tunnels in the Tre'r Gof catchment will also be secured in the revised Construction Method Statement submitted at Deadline 5 (12 February 2019).

ExA Ref.	Question	Horizon’s Response to Question
Q2.8.9	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?	Horizon's detailed programme for monitoring the entrapment of fish is secured in the Code of Operational Practice [REP2-037, section 14.2]. Horizonintends to develop further detail on this monitoring programme after the grant of the DCO, and through the operational water discharge Environmental Permit (in respect of which NRW will approve the details as the discharging authority). This approachis in accordance with [paragraph 2.7.4] of EN6 (National Policy Statement for Nuclear Power Generation) which states: []
Q2.8.10	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?	The only requests for non-material changes that are relevant to the cumulative assesment for marine mammals are those in relation to: • vessel movements [AS-021]; and • working hours [REP4-012]. The other requests for non-material changes are spatially removed from the marine environment, and are therefore not relevant to the cumulative assessment for marine mammals. Horizon's conclusion is that the effects from the two relevant requests for non-material changes do not change the cumulative assessment for marine mammals.

ExA Ref.	Question	Horizon’s Response to Question
Q2.9.2	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.	In their Deadline 1 Submission - Chapter 16 – Noise [REP2-261], Land and Lakes Limited (L&L) raise several concerns relating to the assessment of site suitability for the Site Campus in relation to construction noise. Horizon has responded to key elements of their submission in Deadline 4 Submission - Response to Action Points set in Issue Specific Hearing on the 7 January 2019 [REP4-007], but further detail is included in this response. <u>Baseline noise environment</u> In relation to the baseline noise environment, at section 2.6 of their Deadline 1 submission [REP2-261] L&L consider that: “Given the proposed use of the Site Campus as a residential institution, and given the evidence showing that properties significantly further away have experienced noise from the Existing Power Station transformers to a degree that complaints have been made, our view is that a more robust assessment of the baseline noise environment at the Site Campus location is required in order to confirm its suitability for the proposed use, regardless of the potential construction related noise.” According to the results of historical measurements, the absolute level of National Grid transformer noise at existing Noise Sensitive Receptors is low (i.e. <25 dB(A)), a level which would not normally be expected to give rise to adverse community response. The historical adverse community response has therefore related primarily to the character of transformer noise in the context of the baseline noise environment, rather than its absolute noise level. A key part of this context are the very low baseline noise levels measured during Horizon’s noise surveys. The absolute level of noise from the National Grid transformers at the majority of the Site Campus buildings is estimated to be 35 dB(A) or less. Some of the closest buildings to the transformers may be exposed to slightly higher levels of transformer noise. However, a major difference from the current situation will be the character of the future noise environment during the construction period, which will be influenced by various sources, including the operation of many heavy plant items. The noise levels caused by the construction plant and equipment will generally be well above 35 dB(A), and therefore the transformer noise is unlikely to be a dominant part of the construction phase soundscape. Furthermore, the ventilation strategy for the Site Campus will be Mechanical Ventilation with Heat Recovery [REP2-029], which does not rely upon open windows or trickle vents to provide adequate

ExA Ref.	Question	Horizon's Response to Question
		ventilation and temperature control in rooms. This contrasts with the off-site receptors from which complaints about transformer noise have originated, which rely on open windows for ventilation. Given the future context, the character of the National Grid transformers is not considered likely to be readily perceptible, or to result in annoyance at the Site Campus buildings. <u>Construction noise assessment methodology</u> At section 2.7 of their submission [REP2-261], L&L consider the assessment of the Site Campus in relation to construction noise, and question why the ES uses a different assessment methodology for the Site Campus to off-site noise sensitive receptors. The reason for this is simply that establishing potential noise impacts at existing off-site noise sensitive receptors is quite different to assessing the site suitability for proposed new buildings. Unlike the off-site receptors, Horizon has control over the Site Campus design and management, including aspects which are of particular importance in relation to the ingress of construction noise as follows. • The proposed building materials and constructions, particularly the external facades, windows, and roofs which will be selected to ensure that internal noise levels meet those set out in the building design principles of the Design and Access Statement [REP4-018]. • The building ventilation strategy, which for the accommodation blocks will be mechanical. Unlike many off-site receptors occupants of the accommodation blocks will not be reliant on opening windows to achieve suitable internal air flow rates or summertime cooling. • The orientations and positions of the blocks within the Site Campus, will minimise noise ingress and provide protected outdoor spaces; accommodation blocks located near the perimeter will function as noise barriers for the blocks and amenity spaces located closer to the centre of the Site Campus and near the shoreline. • Where possible the rooms will be allocated to workers on a basis which allows those working night shifts to be located in central blocks which are protected from the

ExA Ref.	Question	Horizon’s Response to Question
		highest daytime noise levels. In contrast, the assessment of off-site properties assumes that the properties <i>do not</i> incorporate any design features specifically intended to reduce noise. At section 2.14 of their submission [REP2-261], L&L note that TAN11 NEC’s do not apply to construction noise, and therefore question why the Site Campus has been assessed in this way. Annex A of TAN11 states: “A1. <i>When assessing a proposal for residential development near a source of noise, local planning authorities should determine into which of the four noise exposure categories (NECs) (Table 1) the proposed site falls, taking account of both day and night-time noise levels.</i>” As can be seen from the above quotation, there is no specific exemption from this methodology for construction noise. The Site Campus noise assessment contained in Chapter D6 therefore considers the noise exposure categories, using the ‘mixed sources’ noise levels as these are the most conservative of those set out in Table 2 of TAN11. L&L are however correct in noting that in relation to construction noise, TAN11 advises that detailed guidance on assessing noise from construction sites can be found in BS 5228. However, this fails to acknowledge that BS5228-1:2009+A1:2014 <i>does not</i> provide any advice on the suitability of a site for proposed new buildings in relation to construction noise. BS5228-1:2009+A1:2014 provides example criteria for the assessment of the potential significance of noise effects, within the context of offering guidance “<i>that might be useful in the implementation of discretionary powers for the provision of off-site mitigation of construction noise arising from major highways and railway developments</i>”. Such guidance is clearly aimed at existing noise sensitive receptors. As noted above, Horizon controls the Site Campus design, and has committed to incorporate high levels of noise insulation. It is therefore difficult to see how the BS5228-1:2009+A1:2014 example significance criteria to identify potential significant effects at dwellings without specific noise insulation measures, or for triggering the provision of retrofitted noise insulation measures, are of relevance to the Site Campus as assessment criteria. At paragraph 2.14 of their submission [REP2-261], L&L assert that in relation to the assessment methodology “A more appropriate strategy would be to calculate noise levels

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		using the calculation methodology provided in BS5228-1:2009+A1:2014 to determine likely internal and external noise levels within the Campus”. The methodology adopted by Horizon is summarised in ES Volume B - Introduction to the environmental assessments Appendix B6-2 - Noise and Vibration Modelling and Assessment Methodology Report [APP-086]. This methodology has been agreed with IACC, and uses BS 5228-1:2009+A1:2014 to predict external construction noise levels as recommended by L&L. Horizon is therefore unclear why this issue has been raised as a point of difference. However, for completeness it should be noted that BS 5228-1:2009+A1:2014 <i>does not</i> provide a methodology for predicting internal noise levels as is suggested by L&L. Instead, construction noise ingress to the Site Campus has been calculated using the methods from BS 8233:2014 and BS EN ISO 12354-3:2017 which both provide methods to predict the internal noise levels from the external noise levels, the proposed building constructions, the surface areas of glazing and other building elements, noise transmission through ventilation paths and key receiving room characteristics (size, surface finishes and furnishings). <u>Construction noise levels</u> At section 2.10 of their submission [REP2-261], L&L raise concerns that construction noise levels at the Site Campus will be greater than those used by Horizon to assess the required sound insulation: “<i>Figure D6-5, reproduced as Figure 2 below, shows the noise mapping for months 31 to 33, which indicates that the construction noise levels during the daytime at the Site Campus are 70dB – 85dB $L_{Aeq,1\ hour}$</i>”. Figure D6-5 illustrates potential construction noise levels at off-site receptors. Reviewing this figure it can be seen that the outfall tunnelling works in construction zone 11 (shown on figure D6-2 in ES Volume D - WNDA Development Figure Booklet - Volume D (Part 1 of 2) [APP- 237]) are the activity which generates the highest noise levels at the Site Campus. However, this figure is based on noise modelling undertaken to provide a conservative assessment of the number of off-site receptors at which potential adverse effects may occur, which has necessarily been conducted using worst-case inputs. One key area where the model inputs are very conservative is in relation to the outfall tunnel works. The noise model places all of the plant and equipment associated with this work at 3m above the ground surface, whereas in reality much of the equipment will be situated in the tunnels, and so noise from these items

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		will not have a direct airborne transmission path to the Site Campus. This especially relates to the Sandvik Roadheader MT720 (or equivalent) and the Sandvik DT820 tunnelling jumbos (or equivalent) which are items of tunnel cutting equipment and which exhibit very high sound power levels. Other items of equipment which will be situated underground within the tunnel include tunnel excavators (e.g. Terex Shaeff ITC 312 or similar), articulated dump trucks, shotcrete robots, concrete mixer trucks, concrete pumps, and tunnel ventilation fans. The noise modelling also includes equipment associated with the construction of the Site Campus, which gives rise to the higher noise levels to the north east of Tre'r Gof. The noise modelling does not include any localised screening around equipment associated with either the Site Campus or outfall construction. BS 5228-1:2009+A1:2014 provides guidance on various measures which may be used to control noise at source, and the following measures are relevant to the tunnelling and Site Campus construction works, but are not included in the noise modelling which underpins figure D6-5 [APP-237]: • acoustically dampening sheet steel piles (expected to give 5 to 10 dB(A) reduction in noise from this activity), • using super silenced dozers, excavators, and dump trucks (also expected to give 5 to 10 dB(A) reduction in noise compared to normal versions of this plant) • and fitting suitably designed mufflers or sound reduction equipment on rock drills and tools (up to 15 dB(A) reduction compared to normal versions) • use of acoustic screens around static equipment and material drop zones (up to 15 dB(A) reduction) For these reasons Horizon is confident that the noise levels presented on figure D6-5 at the Site Campus are overestimates, and it is not appropriate to use figure D6-5 [APP-237] to directly infer noise levels at the Site Campus for design purposes. By contrast, the noise modelling undertaken specifically to assess construction noise levels at the Site Campus as quoted in ES Chapter D6 [APP-125] at paragraph 6.5.49 include many of the mitigation measures detailed above, and is far more appropriate to use as a basis for the Site Campus design.

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		<u>Site Campus noise insulation</u> Sections 2.19 to 2.26 of the L&L submission [REP2-261] focus on the design measures needed to prevent excessive ingress of noise to the Site Campus. It has always been Horizon's intent to provide a high degree of sound insulation for the Site Campus accommodation blocks, and the RIBA Stage 2 Acoustic Statement for the Site Campus examines this issue in detail. The sound insulation performance of the proposed external wall construction for the Premier Modular system has been modelled using INSUL, which is a software program for the prediction of the acoustic performance of building elements. The results of the calculations are R_w 55dB (-3;-11). For triple leaf constructions the calculation has a tolerance of ± 5dB, therefore we must assume that the likely sound insulation performance is R_w 50dB. Calculations have also been undertaken to determine the required sound insulation performance for the glazing within the Accommodation Blocks given the window areas, room dimensions and likely internal surface finishes. The recommended minimum sound insulation performance of R_w (C;Ctr) 35 (-2;-5) dB, which applies to the whole window unit including the frame, although it is noted that this performance specification is indicative only and will be reviewed as the design progresses. In their submission [REP2- 261], L&L claim that a performance of 40 to 55dB R_w+C_{tr}, would be required, however that this is based on noise levels taken from figure D6-5 which, as previously noted, is not appropriate for this purpose and leads to an overestimation of the design requirements. The RIBA Stage 2 Acoustic Statement also advises that a full mechanical ventilation system is implemented for the accommodation buildings which would allow windows to remain closed. Provided that the accommodation building's external walls/roof were to have sufficient sound insulation, and the noise from the mechanical ventilation units is controlled via low noise plant and/or duct silencers, the report concludes that the recommended Indoor Ambient Noise Level targets within bedrooms are likely be achieved. In respect of $L_{AF,max}$ criteria, the most recent 2018 WHO Environmental Noise Guidelines for the European Region notes that the assessment of the relationship between different types of single-event noise indicators and long-term health outcomes at the population level remains tentative. The guidelines therefore make no recommendations for single-event noise indicators.

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		Notwithstanding this, as a precautionary measure the Site Campus design principle at paragraph 3.4.40 of the Design and Access Statement requires that “<i>Acoustic mitigation measures will be provided as part of the building design of the Site Campus to achieve the requirements and guidance provided in BS 8233:2014 ‘Sound insulation and noise reduction for buildings – Code of practice’, World Health Organisation Guidelines (1999) for L_{Amax} levels</i>”. Horizon will revisit the glazing specification for the accommodation blocks as the designs progress, and the construction programme, methodologies and equipment selection develop to ensure these internal acoustic criteria are met. <u>Night shift workers</u> At section 2.24 of their submission [REP2-261], L&L raise the issue of protecting night-shift workers. Horizon accepts that noise levels at the Site Campus will be higher than at alternative locations by virtue of being within the WNDA and therefore closer to construction noise sources. However, as noted above, Horizon is able to specify the design and layout of the Site Campus to minimise noise ingress, is able to control the building construction sequence, and also the allocation of rooms depending on the shifts that staff are working. Due to the scale of the Accommodation Blocks and given the indicative layout, noise levels at blocks near the centre of the Site Campus or close to the shoreline will be significantly lower than for at the most exposed blocks at the west and south boundaries of Work Area No. 3A. Horizon will also strive to minimise the overlap between the outfall tunnelling works and occupation of the Site Campus. The worst-case construction noise levels are expected to last for a relatively short period of time (circa 18 months) and that after this noise levels at the Site Campus will be reduced. Finally, it should also be noted that having the Site Campus on-site will reduce the need to transport up to 4,000 workers to site each day, thus reducing the potential road traffic noise impacts of shift-changes at off-site receptors near to the A5025. <u>External noise levels</u> At section 2.25 of their submission [REP2-261], L&L raise external noise levels at the Site

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		Campus, and the “<i>apparent omission of mitigation such as large scale acoustic barriers</i>”. The Site Campus blocks are substantial, in some cases being up to seven stories tall. The indicative layout on the Site Campus Parameter Plan (drawing WN0902-HZDCO-SCA-DRG- 00001 [APP-016]) shows the blocks arranged three/four deep around the perimeter of Work Area No. 3A, with the majority of the open spaces near the shoreline. Due to their scale (up to 32m tall), the accommodation blocks will provide high levels of noise attenuation, more so than could be provided by noise barriers (which typically do not exceed 4m height). The final layout of the Site Campus will be developed to provide protection to the associated outdoor amenity areas. <u>Construction vibration</u> Sections 2.28 to 2.30 of their submission [REP2-261], L&L consider potential construction vibration impacts at the Site Campus and conclude that “<i>It is highly unlikely that any mitigation measures could reduce an impact of major significance to negligible on a receptor that is just 13m away from the source of the vibration</i>”. The distance of 13m quoted is the minimum separation distance from the outfall tunnelling (construction zone 11 shown on figure D6-2 [APP-237]) and the perimeter of the Site Campus (shown as Work Area No. 3A on drawing WN0902-HZDCO-SCA-DRG-00001 [APP-016]). Whilst it is possible that works generating high levels of vibration could be undertaken at the closest point within construction zone 11 to the Site Campus, it is unlikely; most of the time the works will be further from the accommodation blocks. There are a range of vibration reduction measures that Horizon could implement if the risk assessment shows it necessary, such as using lower vibration equipment, but it is Horizon’s preference to manage this situation by completing the section of outfall tunnelling works which runs past the Site Campus before the closest accommodation blocks are built, thus avoiding the issue entirely. If this is not possible, and it is necessary to undertake work generating high levels of vibration at locations very close to the Site Campus, then Horizon would arrange for the closest blocks to these works to be unoccupied for short periods. This would ensure that there are no significant vibration impacts to the workers.

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Q2.9.3	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?	* IACC & NRW to respond. No applicant response required.
Q2.9.4	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?	Horizon is unaware of any good reason why other permits licences or consents would not be granted on the basis of pollution i mpacts.
Q2.9.5	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	The purpose of the Mitigation Route Map is to identify where various mitigation measures are secured in the DCO. It does not have any formal status, but rather is intended to help both the Examining Authority and interested parties to understand how mitigation relied on by the Environmental Statement and other assessments will be secured.

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	regulation of emissions from the Power Station clearly set out?	For this reason, the Mitigation Route Map does not set out the scope of the respective roles of NRW and ONR in the regulation of emissions from the Wylfa Newydd Power Station. However, the Details of Other Consents and Licences (an updated version of which was submitted at Deadline 4 (17 January 2019) [REP4-026]) sets out details of the consents and licences required for the Power Station, including environmental permits to be obtained from NRW, and the nuclear site license to be obtained from ONR. Natural Resources Wales have set out their role in the regulation of Wylfa Newydd on their website. https://naturalresources.wales/about-us/what-we-do/how-we-regulate-you/wylfa-newydd/?lang=en. Similarly ONR have published their role: http://www.onr.org.uk/civil-nuclear-reactors/newydd-wylfa-intervention-strategy.pdf	
Q2.10.1	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 (TWA)?	Horizon can confirm that the central amenity block will be delivered with the 1st phase of the Site Campus. This will be secured through the update to the Phasing Strategy at Deadline 5 (12th February 2019). Below is the new wording in the revised Phasing Strategy: "To ensure the delivery of the trigger, Horizon would deliver the Site Campus in the following three phases: • Deliver the first 1,000 beds of Site Campus prior to exceedance of 2,200 Non-Home Based workers. This phase would include the delivery of the central amenity block. • Deliver further 1,000 beds prior to exceedance of 4,200 Non-Home Based workers and • Deliver the final 2,000 beds prior to exceedance of 6,700 Non-Home Based workers."	The IACC note Horizon's confirmation that the central amenity building block will be delivered with the 1st Phase of the Site Campus. Given that these facilities will be ready and available to be used by the construction workforce, this reaffirms the IACC's position that the 1st Phase of the Site Campus should deliver more bedspaces. As highlighted by the IACC at the ISH on the 7th January [REP4-034], Anglesey should not bear the risk of Horizon's impacts on existing accommodation and communities, particularly leading up to Y4 Q4. Horizon have not provided any compelling evidence why the site campus cannot either be brought forward, or more bedspaces delivered earlier (i.e. at 1st Phase).

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Q2.10.2	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.	Horizon's Deadline 4 Responses to Actions set in Issue Specific Hearing 7th January 2019 [REP4-007] addresses the initial concerns raised regarding noise and odour at the Site Campus. Noise A full assessment of noise and vibration has been included in chapter D6 of the Environmental Statement [APP-125] and the National Grid transformer noise, deemed to be the most significant noise source, has been included as part of the baseline within the noise modelling which is portrayed in the noise propagation plans in figures D6-3 to D6-10 of the WNDA Development Figure Booklet - Volume D [APP-237]. The absolute level of noise from the National Grid transformers, at the majority of the Site Campus buildings is estimated to be 35 dB(A) or less. Some of the closest buildings to the transformers may be exposed to slightly higher levels of transformer noise, but the character of the noise environment during the construction period when those parts of the Site Campus will be occupied will also be influenced by various sources, including the operation of multiple diesel engines. The ventilation strategy for the Site Campus will be Mechanical Ventilation with Heat Recovery [REP2-029], which does not rely upon open windows or trickle vents to provide adequate ventilation and temperature control in rooms. In this context, the character of the National Grid transformers or any other noise source are not considered likely to result in annoyance at the Site Campus buildings. The Section 61 application under COPA will ensure that noise levels at the campus are sufficiently low to prevent health effects from Noise at the Site Campus' Air Quality Chapter D5 (Air Quality) [APP-124] of the Environmental Statement includes embedded mitigation to prevent effects from Odour at the Site Campus. These measures include: • Raising the requirement for the extension of the DCWW Cemaes WWTW to be designed in a manner to minimise potential odour impacts to residents of the Site Campus. Progress has been made with DCWW since submission of the application

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		through the Statement of Common Ground process. It is agreed that Horizon will be consulted upon during the detailed design of the extension to the Cemaes WWTW to ensure it is designed to minimise the releases of odour which could affect workers residing in the Site Campus. The package sewage treatment plant for Main Construction would be a modularised system that would be predominately enclosed. The processes with the highest potential to emit odours, such as the preliminary treatment (screens), balance tanks, primary treatment, sludge storage and sludge treatment, would be covered with active extraction to maintain a slight negative pressure within the process units. The extracted air would be treated to reduce the odour concentrations. These measures are secured in Main Power Station Site sub-CoCP [REP2-032].The Site Campus would be designed to reduce the exposure of residents to odour emissions. Site Campus buildings within 70m of the Cemaes WWTW will have central heating, ventilation, and air conditioning (HVAC) system on the building with a roof mounted intake (or similar) to minimise odour effects. These measures are secured in the Design Access Statement Vol 3, Appendix 1-2 Site Campus [REP2-029] through design principle 3.4.39. Horizon concludes Wylfa Newydd Power Station Temporary Workers Accommodation Position paper Development Consent Order including noise and vibration Horizon consider that with the proposed mitigation measures in place, there will be no significant effects from odour or noise at the Site campus and therefore odour or noise will not be a reason to make the Site Campus un-attractive to workers
Q2.10.3	How would the TWA become the 'accommodation of choice' for the majority of the construction workforce?	• The Wylfa Newydd DCO Project needs to be able to attract and retain a diverse and highly skilled workforce. A key component of that is ensuring that there is enough accommodation that is: • attractive to workers; • affordable to workers; • has a good range of facilities for day to day living and to socialise; and, • most importantly provides good access to their place of work. • As part of its accommodation package, Horizon is proposing the that majority of the workforce (4,000) will reside in the Site Campus, immediately adjacent to the Main Construction Site. This will ensure that the local housing supply is not adversely affected

ExA Ref.	Question	Horizon’s Response to Question
		by the influx of the workforce to the island. • In order to ensure that the majority of the workforce resides at the Site Campus, and to ensure that Horizon remains within its ES, which is based on no more than 3,000 workers residing in the community, Horizon is proposing the following measure to ensure that the Site Campus is the "accommodation of choice" for the workforce: • Location: The Site Campus has been located within the WNDA and in close proximity to the Main Site. This close proximity to the Main Site, offers workers the benefit of reduced travel time making their journey to work as simple as possible. This will be a key attraction for all non-home based construction workers (approximately 7,000) who do not want to spend unnecessary time and money travelling to and from rented accommodation on Anglesey or on mainland Wales. • Design: Horizon will ensure that the design of the Site Campus results in purpose- built high-quality accommodation and a range of on-site facilities and amenities (such as an amenity building with, café, reception area, gym, bar, retail services, a medical centre and other social space, and outdoor recreation, including two multi-use games areas, outdoor seating and informal public spaces.) Delivery of these proposals are secured through the design principles in the Design and Access Statement (Volume 3). • Alignment with other Projects: In developing the Site Campus proposals, Horizon considered accommodation offerings for other Projects such as Hinkley Point C. Horizon considers that the Site Campus is similar to other Project offerings and will provide an equivalent to 3-star hotel-type accommodation and is likely to include the following features: • Serviced accommodation • Circa 15 square metres of lockable living space per occupant with 3.5 metre head space • All en-suite with power shower • Bed sized at 1.5 single bed size • Broadband and television connections • Catered meals available in amenity building • Laundry points • Occupancy commitments: Horizon has committed to an average occupancy target

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		of 85% within the draft s.106 agreement to ensure that the majority of the workforce reside at the Site Campus. • The WAMS: The Workforce Accommodation Management Service includes a portal which will assist Horizon in directing workers to accommodation options at the Site Campus, rather than in other areas of the island. This is secured under the section 106 agreement and will enable Horizon to monitor occupancy rates at the Site Campus and undertake such necessary remedial measures (such as financial incentives) to achieve the target. • Attracting and retaining a quality workforce in a vital part of the Wylfa Newydd DCO Project's success. The accommodation workers stay in when they are away from home is an important part of retaining their services. High quality facilities at a price acceptable to the workers and viable to the Project can only be achieved with quality design and careful consideration of location and accessibility. The proposed Site Campus meets all three of these needs and Horizon is confident the campus will become the accommodation of choice to the majority of workers working away from home.	
Q2.10.4	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?	Schedule 5 of the revised draft DCO s.106 agreement sets out Horizon's commitment to target an average occupancy rate of the Site Campus of 85%. If necessary, measures will be used to incentivise increased occupancy. Paragraph 4.3 of the revised draft DCO s.106 agreement states: <i>If monitoring undertaken by the Developer indicates that occupancy of the Site Campus is below 85% for more than 1 three month period then the Developer will act to incentivise take up of the Site Campus through measures such as pricing and marketing or other incentives agreed with the Council.</i> This wording is being agreed with the Council currently, although Horizon understands the principle is agreed.	The IACC agree with Horizon's position. If average occupancy is reduced below 85% average for less than 1 three month period, Horizon will take measures (including pricing and marketing) to incentivise take up of TWA. However, the IACC does have concern that if this is a recurring theme (i.e. the incentivisation is clearly not working) then this may need to result in the release of Contingency Fund Payments. These discussions are ongoing through S.106 negotiations.

ExA Ref.	Question	Horizon's Response to Question	Officer
Q2.10.5	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?	Horizon believe that the Site Campus is appropriately located on site and sized at 4,000 bed spaces. Please see response to First Written Question 10.1.3 which provides justification for why TWA is needed for 4,000 workers and secondly why there are significant benefits to housing 4,000 workers in a single on-site campus. Horizon has not assessed the environmental impacts of a larger Site Campus, but it cannot be assumed they would not be significant given the constraints imposed by the SSSI and other factors. In terms of retaining the accommodation for longer, again Horizon considers this to be unnecessary for the needs of the Wylfa Newydd DCO Project. Further this has not been assessed in the Environmental Statement, it would have implications in terms of Nuclear Site Licensing constraints and Horizon has committed to restoration of the site.	The IACC agree that the Site Campus should not be larger than 4,000 bedspaces at this location. However as outlined in the IACC's LIR [REP2-068 section 5.16.3], the removal of the TWA will need to correlate with the decline in construction worker numbers and 'smoothing out' of this decline is required to prevent any adverse impacts on the housing and tourism sectors towards the end of the project. Horizon's accommodation strategy proposes that the TWA will be fully occupied (i.e. 4,000 workers) for just over 18 months (7 quarters), from Year 7 Q2 to Year 8 Q4. It will then decline quite rapidly the following year to 1,250 by Year 9 Q4 and '0' (zero) by the following quarter. This means that by Y10 Q1 there will be 925 additional workers seeking accommodation in the private market. The IACC are in discussions with Horizon on the 'smoothing out' of this decline. This will be discussed and agreed as part of the Statement of Common Ground.
Q2.10.6	Explain why procurement, design and construction issues would delay the timescale for delivery of the TWA– please provide further detail.	- This issue has been addressed in Horizon's Deadline 4 Responses to actions set in Issues Specific Hearings on 7th January 2019 [REP4-007]. - The phasing of the TWA is predicated on the lead-in time for the procurement, construction, installation and connection of the living units that can only be instigated following the Financial Investment Decision (FID). The current programme for procurement, design, manufacturing and installation for Phase 1 is estimated to be around 22 months. The 22 months is considered robust and therefore no delays are anticipated in the procurement, design and construction of Phase 1. As noted at the Issue Specific Hearing held on [7 January 2019] Horizon has amended the Phasing Strategy [REP4-014] to commit itself to delivering each phase of the TWA against a defined schedule . This commitment will ensure that Horizon will deliver the Site Campus on time and there is no delay to the Site Campus becoming operational.	What would the programme be for the delivery of more bedspaces in Phase 1? Once the site is prepared and the utilities etc. are installed, the installation and connection of the additional units should not be much more difficult (particularly given that the Amenity Block would be available in Phase 1). Again, Horizon's commercial decision not to commit until FID (i.e. to avoid financial risk) does not mean that this risk should be transferred to Anglesey's housing and tourism market and communities.

ExA Ref.	Question	Horizon’s Response to Question				
Q2.10.7	What should the minimum occupancy levels for the TWA be and how should they be secured?	The revised draft s.106 agreement sets out the target occupancy rate for the TWA of 85%. The occupancy rate in respect of each phase (as defined in the Phasing Strategy) will start to be calculated 6 months from the opening of that phase, and then be calculated over a 3- month rolling period thereafter. If monitoring undertaken by the Developer indicates that occupancy of the Site Campus is below 85% for more than 1 three month period then the Developer will act to incentivise take up of the Site Campus through measures such as pricing and marketing or other incentives agreed with the Council.				
Q2.10.10	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.	The table below as requested details what the proposed Site Campus through the provision of temporary workers accommodation will physically deliver alongside details of where facilities will be provided through funding as secured by the Section 106 Agreement. <table><tr><td>Number of units/workers to be accommodated</td><td> Single site provides for 4,000 beds with all facilities within the same site. The site is arranged in communities of buildings all within walking access of a central amenity building and transport hub. The site is within walking distance of the work location. Accommodation will include: • Free high-speed broadband access to all bedrooms and common areas of the site • All Bed rooms with net habitable area of 14.6m2, all with en-suite facilities and accessible rooms in each accommodation block. • Kitchenette for each floor of accommodation • Lounge within each accommodation building. </td></tr><tr><td>Date when units would be available</td><td> The commitment is to complete the accommodation in phases set out in a phasing Strategy (REP 4-007) Submitted at Deadline 4 with the first units delivered prior to the </td></tr></table>	Number of units/workers to be accommodated	Single site provides for 4,000 beds with all facilities within the same site. The site is arranged in communities of buildings all within walking access of a central amenity building and transport hub. The site is within walking distance of the work location. Accommodation will include: • Free high-speed broadband access to all bedrooms and common areas of the site • All Bed rooms with net habitable area of 14.6m2, all with en-suite facilities and accessible rooms in each accommodation block. • Kitchenette for each floor of accommodation • Lounge within each accommodation building.	Date when units would be available	The commitment is to complete the accommodation in phases set out in a phasing Strategy (REP 4-007) Submitted at Deadline 4 with the first units delivered prior to the
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			exceedance of 2,200 non-home based workers.
		Number of parking spaces proposed	• 800 car and minibus spaces adjacent to the accommodation site. • Off-site parking provision of 900 spaces at Dalar Hir P&R site with bus shuttle to the Site Campus. • Regular bus service will operate between the Dalar Hir P&R and railway station. • Green travel plant for the site.
		Social, well being, Indoor sports and recreation facilities proposed onsite	the central Amenity Building, there would be the following services: • Gym • 1,500 seat canteen • that can be adopted for use for large gatherings • Licensed bars • Retail outlets • Coffee bars • Multi-purpose rooms (TV/cinema/lounge areas) • Outdoor seating area adjacent to each accommodation block • Outdoor seating in front of the amenity building • Changing for internal and external sports facilities • Multi Faith room in amenity building • Well-being room in amenity building As stated in the revision Phasing Strategy (submitted at Deadline 5 on the 12th February 2019), the Central Amenity Building would be provided with Phase 1 of the development.

ExA Ref.	Question	Horizon's Response to Question	
		Social facilities proposed offsite	No new facilities proposed , although funding through the Section 106 Agreement will be made available to the local community for investment in social facilities.
		Indoor sports and recreation facilities proposed offsite	No new facilities proposed , although funding through the Section 106 Agreement will be made available to the local community for investment in indoor and outdoor sports and recreation facilities
		External sports and recreation facilities proposed onsite	- Two Multi-Use Games Areas (five-a-side football, tennis, basketball, badminton, volleyball with synthetic grass, complete with markings, nets and flood lighting) - General recreation space - Informal outside exercise space
		External sports and recreation facilities proposed offsite	No new facilities proposed , although funding through the Section 106 Agreement will be made available to the local community for investment in indoor and outdoor sports and recreation facilities.
		Health and wellbeing facilities proposed onsite	Medical facility for the Wylfa Newydd construction workforce will be located on the accommodation site (within one of the accommodation blocks). The Medical Centre will be provided with the 1st phase of the site campus, as secured by the Phasing Strategy (REP4-007). The Full specification is provided in Schedule 9 Annex 1 of the Section 106.
		Health and wellbeing facilities proposed	The use of local medical facilities and NHS Trust facilities will be monitored and a contingency fund as set out in in

ExA Ref.	Question	Horizon's Response to Question	
Q2.10.11	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?	offsite	Schedule 8 of the Section 106.
		Ancillary facilities proposed onsite	• Bus facility adjacent to the amenity building to provide daily transport to the adjacent site and other bus connections. • Medical treatment/first-aid room • Security and site office facilities office • Cloth washing and laundry drop-off and collection for residents • Cash point • Toilet facilities • Waste collection and a recycling points
		Ancillary facilities proposed offsite	Footpath to allow residents to walk to work.
		The provision of the Temporary Workers Accommodation on the WNDA Site, as opposed to alternative locations, has two significant main commercial benefits: Firstly the provision of the onsite facility removes significant costs associated with transporting 3500 workers on daily basis from an offsite facility to the WNDA site. In line with NAECl requirements it is expected that the provision of a facility some 17miles from the WNDA site would result in a demand from the Trade Unions to pay excess travel time (note - transport provided (busses) hence no travel cost would be payable, however travel time in line with NAECl at £7-65 per day would be payable to every worker residing at the offsite facility as this would not be the workers preferred choice). It is also possible that enhanced payments may be demanded by the Trade Unions hence the maximum provision detailed in the attached calculation. The cost of providing buses, including drivers, maintenance, running costs , insurance required to transport he workers form the offsite TWA to the WNDA must	

ExA Ref.	Question	Horizon's Response to Question
		also be considered. The numbers involved and the timing of shift patterns means that the buses have to be designated for the sole use of transporting TWA workers to site. This is a significant cost, as detailed in the attached calculation. Secondly the potential risk impact of operating an offsite facility, managed by third parties who may not accept performance guarantees, must also be taken into consideration. The impact of the facility not being available on time, failure to deliver an acceptable standard of accommodation and welfare combined with the risk that the daily bus commute will add significant risk to the project which Horizon considers is unacceptable and would certainly be challenged by investors, particularly as Horizon has a perfectly acceptable onsite TWA solution. Additionally the onsite TWA has been assessed as providing the lowest cost solution in terms of meeting the Government CD&V expectations. Cost Table 1.1 below.

ExA Ref.	Question	Horizon's Response to Question																																																																																																																
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ExA Ref.	Question	Horizon’s Response to Question																		
		In addition to the above it should be noted a during the examination of the proposal presented by Land and Lakes for the site at Holyhead, further exceptional issues totalling circa £200m had been identified. These have been outlined a report issued by Mace in November 2016 and a summary is included below in table (2). <table><tr><th>Item</th><th>Finding</th></tr><tr><td>1</td><td>Architectural Master plans have been prepared to demonstrate how both sites could be developed to meet the Horizon requirements</td></tr><tr><td>2</td><td>Exceptional issues have been identified with a cost of up to £200m in addition to the cost of £210m to build the facility, rendering the scheme unaffordable</td></tr><tr><td>3</td><td>We do not believe the completed facilities will be fully occupied, workers will choose to leave the project or live elsewhere</td></tr><tr><td>4</td><td>We are unable to recommend that a safe design for the Cae Glas site can be provided for use by nuclear construction workers based upon the existing Land and Lakes master plan, an alternative has been developed</td></tr><tr><td>5</td><td>A risk remains that a modified Land and Lakes scheme for Kingsland and Cae Glas will not deliver the required 3500 bedrooms</td></tr><tr><td>6</td><td>Land and Lakes have not demonstrated how they will deliver 3500 bedrooms and have changed their house types since consent was obtained and a number of house types are missing</td></tr><tr><td>7</td><td>An independent study has been undertaken by Jones Lang Lasalle which indicates that the project is currently not fundable via traditional methods.</td></tr><tr><td>8</td><td>The above item will present an issue when the government’s due diligence on the cost of delivering the scheme is audited, it is likely that funding costs will need to be borne by HNP</td></tr></table>	Item	Finding	1	Architectural Master plans have been prepared to demonstrate how both sites could be developed to meet the Horizon requirements	2	Exceptional issues have been identified with a cost of up to £200m in addition to the cost of £210m to build the facility, rendering the scheme unaffordable	3	We do not believe the completed facilities will be fully occupied, workers will choose to leave the project or live elsewhere	4	We are unable to recommend that a safe design for the Cae Glas site can be provided for use by nuclear construction workers based upon the existing Land and Lakes master plan, an alternative has been developed	5	A risk remains that a modified Land and Lakes scheme for Kingsland and Cae Glas will not deliver the required 3500 bedrooms	6	Land and Lakes have not demonstrated how they will deliver 3500 bedrooms and have changed their house types since consent was obtained and a number of house types are missing	7	An independent study has been undertaken by Jones Lang Lasalle which indicates that the project is currently not fundable via traditional methods.	8	The above item will present an issue when the government’s due diligence on the cost of delivering the scheme is audited, it is likely that funding costs will need to be borne by HNP
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ExA Ref.	Question	Horizon's Response to Question
Q2.10.12	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?	The revised Phasing Strategy [REP4-014] provides trigger thresholds for the provision of the TWA. The Strategy secures delivery of the campus in three phases, linked to numbers of Non-Home Based workers, and ensuring thresholds set out within the ES [APP-088] are not exceeded. The focus has been on linking the phasing of its delivery to the Non-Home Based workforce numbers to ensure they do not exceed 3,000 requiring accommodation in the community at any point: • Deliver the first 1,000 beds of Site Campus prior to exceedance of 2,200 Non-HomeBased workers. • Deliver further 1,000 beds prior to exceedance of 4,200 Non-Home Based workers and • Deliver the final 2,000 beds prior to exceedance of 6,700 Non-Home Based workers. In addition the draft s.106 Agreement sets out a proposed occupancy target of 85% for the TWA.
Q2.10.13	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?	Horizon notes that reports by Cambridge University (Annex 8K to IACC's LIR [REP2-125]), Arc4 (Appendix 5 of Gwynedd's LIR submission [REP2-297]), and Three Dragons, has been submitted and that these include reference to possible levels of stock availability, however none of these reports include evidence in support a particular figure. In addition the IACC / Welsh Government / GC / CC Joint Post-Hearing Note on Housing and Accommodation Baseline Figures submitted at Deadline 4 ([REP4-034] and [REP4-054]) set out a claimed joint position of 10% capacity. Horizon challenges this claim – further detail is set out in Horizon's response to these submissions (to be submitted at Deadline 5).

ExA Ref.	Question	Horizon’s Response to Question
Q2.10.14	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 ned to be updated, how it could be secured and what it would enable?	Horizon is required to deliver the Worker Accommodation Portal, and all NHB workers will be required to register with the Worker Accommodation Portal. this is secured in schedule 5 of the DCO s.106 agreement. The portal will enable: accommodation providers to register available and suitable accommodation (which includes the Site Campus); the Workforce to search for accommodation that meets their needs; the Workforce to be put in contact with the accommodation providers or their agents. The portal will be open prior to Implementation. Horizon will work with an appointed Agent to ensure the operation of the Portal in accordance with the WAMS, for the duration of the Construction Period. The Portal will allow the monitoring of worker accommodation choices including location, and type of accommodation. Data will be made available to the WAMS Oversight Board on a quarterly basis or other such agreed period. This will enable monitoring of the take up of PRS accommodation by the workforce and trigger the release of the Accommodation Contingency Fund should thresholds be exceeded and the Council supplies evidence that such exceedance is causing an increase in homelessness and/or PRS rent increases.

ExA Ref.	Question	Horizon’s Response to Question
Q2.10.15	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 of more empty homes than the current schemes run by the IACC and GCC? 4) How could the Housing Fund be pro- active rather than re-active in enabling the delivery of housing? IACC and GCC 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 and how long it should run for. 3) Indicate how you think the fund could provide the ‘capacity enhancement boost’ suggested by the Applicant.	1) The proposed Housing Fund was calculated based on delivering additional bedspaces in the Latent, PRS and owner-occupied sectors and to support the wider efficient operation of the housing market that might also release more capacity. How much additional housing capacity can be provided depends on how efficiently the fund is spent. This is currently subject to ongoing discussion between Horizon and IACC and good progress has been made. As set out in Horizon’s response to IACC’s LIR [REP3-004], the experience at Hinkley Point C (HPC) shows that very high levels of efficiency can be achieved. The various programmes there have achieved unit costs of between £1,100 and £5,500 per bedspace. Taking the upper end of that range, the £10m proposed at Wylfa could deliver 1,800 bedspaces in the PRS and owner-occupied sectors – higher than the forecast demand of 1,500. Horizon acknowledges that costs may be higher in Anglesey. In October 2018 IACC suggested that each empty home costs around £20,000 to bring back into use and would deliver an average of 2.6 bed spaces per unit (Horizon believes the typical PRS unit is slightly larger at 2.9 bedspaces). The equivalent for new-build was not explicit, but Horizon estimates it to be £40,000. This is in line with advice from Housing Associations and commercial developers on the maximum level of subsidy that would be required under current market conditions (those conditions are likely to improve with more demand from Wylfa workers). Smaller measures such as minor grants to improve properties (including latent accommodation) and to support the working of the wider market (such as support for people who want to down-size) could also add capacity. The following table is set out in Schedule 5 of the revised draft S106 and provides an indicative breakdown based on those figures that would deliver 1,745 bed spaces.

ExA Ref.	Question	Horizon’s Response to Question																														
		Housing Fund – Indicative Bedspace Delivery (Schedule 5, revised draft S106) <table><tr><td></td><td>Share of spending</td><td>Spend per unit</td><td>Units</td><td>Bedspaces</td></tr><tr><td>Empty Homes</td><td>£5,000,000</td><td>£20,000</td><td>250</td><td>725</td></tr><tr><td>Minor grants</td><td>£500,000</td><td>£1,000</td><td></td><td>500</td></tr><tr><td>Mkt efficiency</td><td>£500,000</td><td>£5,000</td><td>100</td><td>260</td></tr><tr><td>New build</td><td>£4,000,000</td><td>£40,000</td><td>100</td><td>260</td></tr><tr><td>Total</td><td>£10,000,000</td><td></td><td>450</td><td>1,745</td></tr></table> There is some uncertainty about the number of empty homes that could be delivered and IACC thinks it may be less than the 250 in the table above. If £2m were shifted-reallocated from Empty Homes to New Build it would reduce delivery of Empty Homes from 250 to 150 and increase New Build from 100 to 150, ie a net reduction of 50 homes and 130 bedspaces. This would still be sufficient to provide just over 1,600 additional bedspaces in the three sectors which compares to total forecast demand from workers of 1,900. 2) The Fund would be paid in three instalments: 10% on implementation, and then 45% on each of the first two anniversaries of implementation, as set out in Schedule 5 of the revised draft s.106. In addition, to provide resilience, a further £5 million housing contingency fund is proposed in Schedule 5 of the revised draft s.106, which can be released at set trigger points. 3) The Housing Fund would allow the local authorities to increase the size of their existing schemes both of which are resource constrained. Evidence from Welsh Government [Table 12-3 of REP2-367] shows that there are 779 long-term empty properties on Anglesey and a		Share of spending	Spend per unit	Units	Bedspaces	Empty Homes	£5,000,000	£20,000	250	725	Minor grants	£500,000	£1,000		500	Mkt efficiency	£500,000	£5,000	100	260	New build	£4,000,000	£40,000	100	260	Total	£10,000,000		450	1,745
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ExA Ref.	Question	Horizon's Response to Question
		further 542 on the Menai Mainland. IACC's LIR reported that an average of 80 empty homes had been returned to use over the last four years [REP2-068 p.5]. The Housing Fund will allow this number to be increased significantly. 4) The purpose of the Capacity Enhancement element of the Housing Fund is to be pro- active. For that reason it is paid early in the construction phase (as set out above) so that mitigation can be provided in advance of any impacts arising. It is not tied to evidence of impacts and therefore is not reactive. As set out in Schedule 5 of the revised draft s.106, the Worker Accommodation Management Service (WAMS) Oversight Board will agree an annual programme of works identifying how the Councils will apply the Fund to achieve the target number of new bed spaces, including identifying key performance indicators demonstrating acceptable progress to delivering capacity, and identifying regular reporting dates from the Councils to Horizon (no less than quarterly). An annual review at years 2, 3, and 4 of the Construction Period will review against target delivery of 1,745 bedspaces and should delivery targets not be met a remedial action plan will be developed.
Q2.10.17	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?	The WAMS is secured by the draft s.106, see schedule 5 of the draft revised s.106 agreement provided at deadline 5 . This obligation includes Horizon's key commitments to maintain the Worker Accommodation Portal, including requiring all non home based workers to register with the service, and to provide monitoring reports to the WAMS Oversight Board. Further detail is set out in response to Q2.10.14. Horizon does not understand that IACC or Welsh Government are concerned about securing the WAMS in the s.106 agreement.

ExA Ref.	Question	Horizon's Response to Question
Q2.10.18	1) What could be the effect on accommodation availability on Ynys Mô 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.	1) Delivery of the TWA is now explicitly linked to the size of the workforce via the revised Phasing Strategy submitted at Deadline 4 [REP4-014] (a further minor update is proposed at Deadline 5). Therefore a delay to its delivery would result in a cap on the size of the workforce until it is delivered. Triggers for the delivery of the TWA are set out in the revised Phasing Strategy (REP4-014), securing delivery of the campus in three phases: • Deliver the first 1,000 beds of Site Campus prior to exceedance of 2,200 Non-Home Based workers. This phase would include the delivery of the central amenity block. • Deliver further 1,000 beds prior to exceedance of 4,200 Non-Home Based workers and • Deliver the final 2,000 beds prior to exceedance of 6,700 Non-Home Based workers. In addition the following trigger is set out with respect to the Site Campus Medical Centre: • Phase 1 of the Site Campus (i.e. deliver the first 1,000 beds of Site Campus prior to exceedance of 2,200 Non-Home Based workers) to include a Centre at the Site Campus appropriate to the number of patients on site. 2) and 3) are therefore not relevant as there would be no adverse effect.
Q2.10.19	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?	The commitment is clearly made by Horizon, in the DCO, to maximise the opportunities within the local area with respect to jobs and supply chain opportunities. The SCAP is to be developed with IACC and other stakeholders, including the Welsh Government, Gwynedd and Conwy Councils. The draft DCO s.106 agreement secures the Supply Chain Action Plan (SCAP) to maximise local supplier engagement in the supply chain. Schedule 5 Paragraph 8 of the draft revised s.106 agreement (issued to IACC and Welsh Government on 23 January 2019) proposes the following commitment, including timing, scope and implementation: <i>8.1 The Parties undertake to develop the Supply Chain Action Plan for the construction of the</i>

ExA Ref.	Question	Horizon's Response to Question
		<i>Wylfa Newydd DCO Project in consultation with the Welsh Government to ensure a Supply Chain Action Plan is in place prior to Implementation and the Parties agree to thereafter comply with the Supply Chain Action Plan.</i> <i>8.2 The Supply Chain Action Plan will:</i> <i>8.2.1 Identify the Wylfa Newydd DCO Project activities requiring supply contracts.</i> <i>8.2.2 Outline the minimal standards to be eligible for contracting.</i> <i>8.2.3 Require publication of invitations to tender to local eligible suppliers.</i> <i>8.2.4 Enable local suppliers to register their interest in supplying the Wylfa Newydd DCO Project and apply for available tender invitations.</i> <i>8.2.5Facilitate engagement between the Developer and individual suppliers.</i> <i>8.2.6 Establish annual key performance indicators and monitoring and reporting protocols on key performance indicators.</i> <i>8.2.7 Require the Developer to make relevant supply chain opportunities and information available as early as possible to the Council, Welsh Government and Conwy and Gwynedd Councils to enable local suppliers to ensure business readiness to access the supply chain for the Wylfa Newydd DCO Project.</i> <i>8.3 The Parties agree that the Supply Chain Action Plan will not require additional expenditure from the Developer in addition to the contributions committed to in this schedule.</i> It was initially intended that a copy of the SCAP was to be annexed to the draft DCO s.106 agreement. Nonetheless, Horizon has accepted that IACC and other stakeholders are unlikely to agree the Supply Chain Action Plan prior to signing the agreement. As such it has been agreed with these stakeholders that the SCAP will be subject to subsequent development, based on the a framework set out in the draft DCO s.106 agreement. This wording is being agreed with IACC currently and although it is likely to be amended, the principle is agreed.

ExA Ref.	Question	Horizon’s Response to Question
Q2.10.21	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) There are currently no separate defined terms of reference for the Jobs and Skills Implementation Plan (JSIP). Following the hearings, Horizon accepted that IACC and other stakeholders were unlikely to agree the JSIP prior to signing the s.106 agreement. As such it has been agreed the JSIP will be subject to subsequent development, based on a framework set out in the draft DCO s.106 agreement. It is noted that the terms of reference for the Wylfa Newydd Employment and Skills Service (WNESS), the collaborative initiative with the aim of promoting and sourcing local employment opportunities, are to be appended to the DCO s106 agreement. The draft revised DCO s.106 agreement (issued to IACC and Welsh Government on 23 January 2019), at Schedule 4 paragraphs 2 and 3 set out a framework for the JSIP, which includes (in summary only): • processes for identifying opportunities by which the Developer and its contractors and the Council will identify skills and training gaps and opportunities to meet the needs of the Wylfa Newydd DCO Project. • Identifying programmes for delivery of the training to fill the identified skills and training gaps and opportunities, and for getting unemployed persons back into the workplace. • Fill the identified skills and training gaps and opportunities, • Require monitoring • Identify annual key performance indicators towards achieving a Workforce comprising at least 2000 home-based members by peak construction. • Require actions and mitigations should key performance indicators be missed. 2) The JSIP will be developed collaboratively by the IACC and Horizon, including with the Jobs and Skills Engagement Group. This is to be secured under the s.106 agreement. Proposals for this process are included in the draft revised s.106 agreement. This wording is being agreed with IACC currently and although it is likely to be amended, the principle is agreed. Delivering the JSIP will be primarily IACC and other training providers. This is funded via the

ExA Ref.	Question	Horizon's Response to Question	
		Jobs and Skills Contribution.. That contribution of £10 million is anticipated to be partially retained by IACC for programmes to get unemployed, and economically inactive persons back into work, and also for onward payment to Grŵp Llandrillo Menai and other specialised training partners. The fund is designed to be both flexible and of a sufficient amount to achieve the 2,000 home-based worker threshold as set out in the ES [APP-088]. Further detail of how the £10 million fund was calculated is set out in response Q2.10.22. 3) The Jobs and Skills Engagement Group will include representatives from each of the Council, Horizon, the Welsh Government, Department of Work and Pensions Wales, North Wales Economic Ambition Board, and Grŵp Llandrillo Menai. The group will be responsible for the development and updating of the JSIP. As stated above, specific delivery of training programmes will be by IACC and other training providers.	
Q2.10.22	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) The Jobs and Skills Contribution is sufficient to support the threshold of ensuring and providing appropriate training to ensure 2,000 home-based members of the workforce at peak construction, as set out in the ES [APP-088]. As set out in the response to the ExA's FWQs [REP2-375] [Q10.2.14] Horizon has drawn on a range of precedent and evidence to develop the scale of the fund, including other Draft DCO s.106 packages, spending benchmarks from the Government's Work Programme and planning obligations Supplementary Planning Documents. This evidence informed the planned measures to ensure a peak home-based workforce of 2,000. A cost bench-marking exercise was carried out based on 1,000 local residents moving from worklessness into work and a further 1,000 local residents training or upskilling in order to work on the project (or backfill other vacancies). With respect to moving people from worklessness into work, £4.35m has been allocated. This is based on the Work Programme costs for 450 JSA / equivalent recipients aged 18- 24, 450 JSA / equivalent recipients aged 25 and over, and 100 JSA / equivalent recipients who are seriously disadvantaged. The costs of pre-apprenticeship training and of the cost of upskilling existing workers have	The IACC has previously provided a response as part of its submission to Deadline 5. The IACC re-iterates that further discussions are required on the allocation and distribution of the funding as part of the s.106. The IACC requests from HNP a copy of the methodology / calculation on how the £10m figure and £2m contingency fund was derived at.

ExA Ref.	Question	Horizon's Response to Question	
		also been reviewed to estimate the cost of supporting 1,000 apprenticeships (estimated cost of £1m) and 1,000 workers being upskilled (estimated cost of £2m). 2) The Jobs and Skills Contribution will support the strategy within the Jobs and Skills Implementation Plan and will fund a range of skills, training, return to work programmes for unemployed persons, education activities, outreach and WNESS support activities agreed by the Jobs and Skills Engagement Group, and implemented by Grŵp Llandrillo Menai, the Council and other specialised training and education partners. The fund will be paid to IACC for onward payment to Grŵp Llandrillo Menai and other specialised training partners. Funds are also allocated for onward payment to Betsi Cadwaladr University Health Board and Public Health Wales to minimise any impacts of labour churn on respective staff. With respect to education, activities could include development of school resources, support for careers advice and student sponsorship for under- and post- graduate courses, all of which have been requested by IACC and Welsh Government. Gyrfa Cymru/Careers Wales will also be a key Educational partner acting as the conduit for business in to local schools. Details with respect to the timing and scale of the Jobs and Skills Contribution are set out in Schedule 4 of the draft s.106 agreement. A first payment will be made prior to Implementation, and subsequently on each anniversary of Implementation up to the eighth anniversary. The draft s.106 agreement also sets out details of the Jobs and Skills Contingency Fund. Should monitoring indicate that the 2,000 home based members of the workforce at peak construction is unlikely to be achieved, the Jobs and Skills Engagement Group will develop a remedial action plan – the purpose of which would be to achieve 2,000 home based members of the workforce. The plan may include mitigation proposals for expenditure up to the maximum of the Jobs and Skills Contingency Fund – maximum of £2m.	

ExA Ref.	Question	Horizon’s Response to Question
Q2.10.23	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) 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?	Achieving high levels of local employment requires a joint approach. Horizon will work with contractors and a range of local stakeholders including IACC, Welsh Government, the Department for Work and Pensions Wales, North Wales Economic Ambition Board and Grŵp Llandrillo Menai, all of whom are members of the Jobs and Skills Engagement Group. Horizon has accepted that the JSIP will not be agreed prior to signing the s.106 agreement and so the revised draft s106 includes at schedule 5 a framework developing the JSIP. This agrees that KPIs will be developed with the Job and Skills Engagement Group. The key KPI is ensuring 2000 home based workers at peak; interim KPIs to monitor the progress towards that would be needed. The scale of the Jobs and Skills Contribution is sufficient to achieve a minimum of 2,000 home-based construction workers at peak (ie. meeting threshold levels as assessed in the ES [APP-088]). This approach is detailed further in response to Q2.10.22. Nevertheless, Horizon has also agreed for further £2 million skills contingency fund if the KPI monitoring indicates at certain points that the 2000 home based worker KPI is unlikely to be met. Horizon remains committed to working in partnership with stakeholders to develop and implement the JSIP. The revised draft DCO s106 agreement also establishes a new £2 million Jobs and Skills (Contingency) Fund which can be released by the Jobs and Skills Engagement Group in the event the monitoring of the KPIs indicate that the 2,000 home based workers at peak is not likely to be be met.

ExA Ref.	Question	Horizon's Response to Question
Q2.10.24	Should the early phases of construction have higher targets for the use of local labour and if so how could this be secured?	In its response to the ExA's FWQs [REP2-375] [Q10.2.18] and [Q10.2.19] Horizon set out details of apprenticeship scheme activity carried out to date, and the measures planned to support the training and recruitment of home-based workers in the early phases of construction. Horizon is not proposing targets for local labour. Achieving high levels of local employment is a joint endeavour between Horizon and membership of the Jobs and Skills Engagement Group. Horizon is confident however that through the Jobs and Skills Contribution and implementation of the Jobs and Skills Implementation Plan (JSIP) the thresholds for employment of 2,000 home-based workers at peak as assessed in the ES [APP-088] will be achieved. Although no targets are set, the nature of construction work in the early years of the programme is less specialist and considered more likely to have a higher proportion of home-based workers. As secured by the draft revised DCO s.106 agreement (issued to IACC and Welsh Government on 23 January 2019) the JSIP will identify annual key performance indicators towards achieving a Workforce comprising at least 2000 home-based members by peak construction; with associated monitoring and reporting protocols, and required actions should key performance indicators be missed.

ExA Ref.	Question	Horizon's Response to Question	Comment
Q2.10.25	Do 'local', 'visitor' and 'worker' need to be defined? If they do what and where should these definitions be located?	A home-based worker is a worker that commutes to work from their main residence on a daily basis. This is set out in the General Glossary [APP-006]. It has been agreed that the CoCPs (and likely the DCO s.106 agreement) will set out the following definitions: A DCO Site visitor is someone who is not badged to access the site and is visiting or temporarily working on the WNDA. A permanent worker is a worker with a badge allowing access to work at WNDA 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.	
Q2.10.27	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?	Horizon recognises the risks and particular challenges faced by the health and social care sectors. Horizon has committed therefore to work with workforce planning in these sectors to improve resilience to potential labour market churn. Horizon's commitments are secured via the draft DCO s.106 agreement. The draft DCO s.106 agreement secures the Jobs and Skills Contribution which includes providing funds to IACC for onward payment to Betsi Cadwaladr University Health Board (£50,000) and Public Health Wales (£50,000) for staffing and workforce planning to minimise the impacts of labour churn on staff. Further funding is secured in the draft DCO s.106 agreement (in total £10 million) which can be allocated on a flexible basis to address any specific support required, and deliver appropriate measures both to expand the workforce and provide occupation specific training as required. Schedule 9 of the draft DCO s.106 agreement sets out funds that will be made available to the Emergency Services, this includes funding which has a workforce planning component. Schedule 1 (and 15) sets out the funds available to support Welsh Language immersion teaching, as well as other key measures to support Welsh language and culture as it relates to the Project.	Discussions are progressing well between the IACC and HNP on the draft s.106. However, the IACC raises the following points: Clarity is required on whether the financial contribution to Public Health Wales and Betsi Cadwaladr University Health Board are one-off payments or annual in order to minimise the impacts of labour churn on staff. There is no specific fund to minimise displacement which is of concern to the IACC. Concerns of displacement in the construction industry and non-construction sectors such as Tourism and Social Care have been raised several times including in the IACC's LIR [REP2-061 to REP2-152-, particularly REP2-063 and REP2-067] Currently the £10m Employment and Skills Fund is the only fund available which is meant to address displacement as well as up-skilling / re-skilling individuals and return to work programmes for the unemployed and NEETs.

ExA Ref.	Question	Horizon's Response to Question	Comment
Q2.10.28	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.	Horizon is in discussion with North Wales Fire and Rescue Service (NWFRS) on a proposal for Horizon to deliver onsite fire services from implementation until the end of the construction period. The draft specification for those onsite fire services is proposed to be appended to by Horizon is secured in the draft DCO s106 agreement. The draft DCO s106 agreement also provides for an Emergency Service (Fire) Contribution. The proposed contribution to NWFRS includes a component to manage workforce planning as follows: - Increasing the existing North Wales Fire and Rescue Service presence at Holyhead Port to a 24 hours presence during the peak construction years. - Additional training and heavy lifting equipment for deployment at road traffic accidents. - Workforce planning. - Staffing time and costs required to physically review the Site and liaise with the Developer in respect of the with the construction build for the duration of the Construction Period. Further, an Emergency Services Engagement Group will be constituted under the DOC s.106 agreement, to which NWFRS will be an invited representative. This group will ensure that there is ongoing discussion and collaboration between the developer and NWFRS in terms of managing workforce planning as well as all other matters relating to monitoring and implementation of the obligations relevant to this schedule of the agreement.	
Q2.10.29	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?	The Jobs and Skills Contribution is a total of £10 million which is paid in set tranches (as set out in schedule 5 of the DCO s106 agreement) to (a) IACC, and (b) to IACC for onward payment to Grwp Llandrillo Menai and other training providers, to support reskilling and upskilling including for those already in work. The contribution is secured in the DCO s.106 Agreement. The draft DCO s.106 agreement sets out a number of requirements of the Jobs and Skills Implementation Plan ("JSIP"), including a commitment to agreeing a JSIP for the operational period. Horizon anticipates the JSIP will have two specific objectives relating to upskilling	HNP's response to q2.10.22 does not clearly specify how the jobs and skills contribution quantum was determined. The IACC are eager to understand how the financial figure was derived at in order to facilitate further discussions between the IACC and HNP as part of the s.106. The support and training provided for adults and those in already in work should include up-skilling and re-skilling as per the IACC's LIR Local Employment Chapter (REP2-063) to allow for job opportunities in both the construction and operational phases of the project.

ExA Ref.	Question	Horizon's Response to Question	Comment
		(construction and operational phases): i) Identify opportunities to upskill local construction workers for the Wylfa Newydd project by: a. Identifying competencies within local construction sector that would benefit from additional training to access WN roles e.g. painters b. Work with training providers to design and fund upskilling courses from Jul-20 onwards c. Establish assessment and competency testing centres for roles with employers ii) Work to identify those individuals within the workforce who would benefit from upskilling programmes to meet future skills needs by: a. Identifying short-duration training for construction trade staff to upskill into higher level roles and develop skills valuable during the operational phase b. Consider how operative and labouring workforce can be deployed into plant operative roles through upskilling CPCS courses from year 3 onward The response to further written question 2.10.22 sets out the basis for how the Jobs & Skills Contribution quantum was determined. which includes [£2m] for upskilling. Specifically with regard to the operational phase, there are a number of routes into the operational utility for Wylfa Newydd: • From the open jobsmarket, • From the existing nuclear industry, • Transfer from the existing Horizon business, • Apprentices, • Graduates. Horizon has held numerous discussions with Magnox and has participated in a number of talks with teams at Wylfa and Trawsfynydd in order to educate the staff as to the standards required, timelines as to when jobs will become available and the nature of the technology to	

ExA Ref.	Question	Horizon's Response to Question	Comment
		be used at Wylfa Newydd. Provision of career route maps, job profiles and other such information is freely available and widely distributed through attendance at open surgeries, county shows, Eisteddfod and other public facing events to encourage and educate the wider population as to the opportunities available at Wylfa Newydd. The DCO s106 agreement also commits to these types of activity. Horizon anticipates the JSIP will include a number of specific activities for the operational phase. These are: • Liaison with FE training providers on course content and timelines for recruitment into operational roles • Explore opportunities for engagement with HE in relation to bursary payments for degree courses linked to operational roles, as well as degree level apprenticeships in England • Input into WNESS pre-employment programme to maximise recruitment of candidates into operational roles • Define reskilling programme for demobilised construction workforce • Provide visibility of anticipated apprentice recruitment dates and competencies	
Q2.10.30	Confirm how, when and where health care provision would be provided at the site should the DCO be consented.	Where Horizon would operate two on-site healthcare facilities: • a Construction Site Clinic (CSC) (a facility within the construction security fence on the Power Station Site. This will provide occupational health; primary health; triage; general medical consultations; intravenous therapy; stabilisation of soft tissue injury and fractures / trauma; general stabilisation prior to transport; medication therapy; drug and alcohol testing; and resuscitation services / advanced life support. • a Site Campus Medical Centre (SCMC) (a medical centre on the Site Campus. This will provide GP services to the whole of the construction workforce on a	

ExA Ref.	Question	Horizon’s Response to Question
		walk-in centre model. How • Horizon will appoint a private sector provider for health services on-site (both the CSC and SCMC) and for integration with the NHS. • All arrangements for healthcare services for the construction workforce will be robust; meet required professional, clinical and statutory requirements, and minimise unintended consequences for local NHS services through unanticipated demand. • Commitments to these facilities are secured in paragraph 4.2.3 of the Main Power Station Site Sub-Code of Construction Practice submitted at deadline 5. • The draft scope of services for the SCMC is intended to be attached to the S.106 agreement – see Annex 1 to Schedule 8 of the 23.01.19 updates to the draft s106 agreement provided at deadline 5. When • The CSC will be open from DCO commencement (excluding SPC works). • The SCMC will be open from the date of opening of the first Site Campus accommodation block. This is confirmed in the Phasing Strategy [deadline 5 submission]. • Prior to the opening of the SCMS, Horizon will pay increased financial payments to IACC, for onwards payment to BCUHB. This is secured in Schedule 8 of the draft DCO s.106 agreement. • Once the SCMC is open, these payments reduce, reflecting that the workforce will largely be using the SCMC. • Horizon will develop full operational detail of the CSC and SCMC to an appropriate timeline post-DCO. Appropriate engagement will take place post-DCO grant and prior to implementation.

ExA Ref.	Question	Horizon’s Response to Question
Q2.10.31	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.	• Please see response to Q2.10.30 which provides the timeline for the provision of services before the Site Campus that Horizon has agreed with health stakeholders. • All services, including ambulance service, occupational health and safety will be provided on site in proportion to the size of the workforce and the activities being carried out
Q2.10.32	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?	1) Detail what health services would be provided on site and what would be out- sourced to local providers. 1(a) Health services that would be provided on site: Annex 1, Schedule 8 of the draft DCO s106 agreement (as provided at deadline 5) sets out the following SCMC services (guideline): primary health care for non-work- related injuries and illnesses; chronic illness management; occupational health; clinical assessment; ECG testing/interpretations; intravenous therapy; management of soft tissue injury and fractures; common illness and injury management; minor and major trauma management; resuscitation services / advanced life support; immunisations; environmental health risks; illness and injury prevention programme execution; well-being programmes and mental health well-being programmes; psychological disorders management (alcoholism, chemical dependence); health promotion/public health management; physiotherapy; and drug and alcohol testing. The draft specification for the SCMC goes on to discuss: staffing; pharmaceuticals and consumables; health surveillance; drug and alcohol programmes; emergency services; first aid kits and defibrillators; and patient medical record management. 1(b) Health services that would be out-sourced to local providers. Horizon will contract with local providers for the following services: • Dentistry; • Pharmacy; and

ExA Ref.	Question	Horizon’s Response to Question
		- Laboratory services. The draft DCO s106 agreement (as provided at deadline 5), Schedule 8 commits Horizon to developing a proposal for each of these services. 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? 2(a) Hours over which the service would operate Horizon will work with both the appointed provider and relevant health stakeholders to develop a strategy that scales to work force numbers Appropriate out of hours services would be provided as part of the on-site healthcare provision. Horizon is committed to developing full operational detail of the Construction Site Clinic (CSC) and Site Campus Medical Centre (SCMC) to an appropriate timeline following the grant of the DCO. This is secured within the Draft DCO S.106 Updated version which will be submitted at Deadline 6 (19th February) 2(b) Workers on night shifts access services The timing of clinics will take account of the needs of all construction workers. Horizon is committed to developing full operational detail of the CSC and SCMC to an appropriate timeline post-DCO. (c) Provision for out of hours emergencies - Horizon is committed to developing full operational detail of the CSC and SCMC to an appropriate timeline post-DCO.

ExA Ref.	Question	Horizon's Response to Question
		3) What number of health staff would be employed on site and would this be reflective of the NHS staff: patient ratios? 3(a) Number of health staff to be employed on site • Horizon is committed to developing full operational detail of the CSC and SCMC to an appropriate timeline post-DCO. • Illustrative staffing details are provided below. • Earthworks and Marine. 300 to 1,000 persons on site. Mostly working daylight hours 6 days per week. A standard construction site set up with pre-fab buildings, first aid/ medical room manned by a nurse practitioner plus a level 1 Emergency Medical Technician (EMTs) once major work begins. Whilst the nurse would do Occupational Health and some primary care there will be some onward referral to local NHS services. Site all-terrain ambulance for earthworks areas. • Start of Main works, 1,000 to 3,000 on site. 2 shifts / 7 day working. Construction Site Clinic fully operational. Nurse practitioners, Higher Level EMTs on both working shifts, Site Ambulances operational subject to DoR agreed with WAST, Occupational Health and Physiotherapy support. There would be no Site Campus Medical Centre at this point and everyone is still in local accommodation. at a population level to be agreed. • Peak Construction 3,000 rising to 9,000 on site. Full services as proposed. 24 hr emergency provision including fire and rescue team to support, based at Construction Site Clinic, with the Site Campus Medical Centre providing primary care to all workers plus out of hours to Camp residents. 3(b)Would this be reflective of the NHS staff: patient ratios • Horizon is committed to developing full operational detail of the CSC and SCMC to an appropriate timeline post-DCO. • All arrangements for healthcare services for the construction workforce will be robust; meet required professional, clinical and statutory requirements, and minimise

ExA Ref.	Question	Horizon’s Response to Question
		unintended consequences for local NHS services through unanticipated demand. 4) Would health services be available in Welsh? Staffing of the on-site medical centre will be in accordance with Horizon’s Polisi Iaith Gymraeg/Welsh Language Policy (see Horizon response to First written Question 10.3.6). Clause 1.1 of Schedule 1 of the draft DCO s106 agreement (as provided at deadline 5) requires the Horizon to develop in consultation with the Council and the Welsh Government a Welsh language skills competency framework , which will among other things: • identify job roles which require Welsh language skills and the skill level or range of levels required; • identify those job roles which require level 3 or above Welsh Language Skills which will include [identified public facing roles, the Community Involvement Officers, and defined internal roles such as members of the café staff and HR team]; 5) How would the transfer between on-site and NHS services work? • Horizon is committed to developing full operational detail of the CSC and SCMC to an appropriate timeline post-DCO and this will include the ways in which on-site services will link with the NHS. . • Horizon and Betsi Cadwaladr University Health Board are close to agreeing the financial aspects for referrals between on-site and NHS services. This is based on a model provided by Betsi Cadwaladr University Health Board and includes categories for: • Primary Care, for example: General Medical Services, Sexual Health, Mental Health, Dental, and Pharmacy • Secondary Care, for example: A&E Attendances, Emergency Admissions, Elective Admissions, Elective Day Cases and Outpatients.

ExA Ref.	Question	Horizon's Response to Question
Q2.10.33	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?	• Prescriptions are free of charge in Wales. During the Construction Period, the cost of free prescriptions for the non-home based members of the workforce will be covered by Horizon. This is secured in the Draft DCO s.106 Agreement (An updated version of which will be submitted at Deadline 6 – 19th February) • The calculation of the "Health (First NHS Workforce Use) Payment" and the "Health (Second NHS Workforce Use) Payment" include a cost element for NHS pharmacy usage by the construction workforce (which reflects expectations of low NHS usage). This accounts for the difference between the pre-SCMC and post-SCMC prescribing arrangements. • Pre-SCMC the prescriptions will be written by NHS GPs. The "Health (First NHS Workforce Use) Payment" reimburses these prescription costs. • Post-SCMC the prescriptions that will be written by the SCMC clinicians will be private prescriptions. The intention is that all workers will be able to use prescriptions without paying a fee. This will remove the incentive of free prescriptions that might otherwise persuade some non-home-based workers to register with a Welsh GP [REP2-059]. • As the pharmacy services would be provided by a private provider, no financial payment to the public sector is therefore proposed for this item. • Requesting and receiving prescriptions by the workforce would be offered on site; storage of medicines and filling of prescriptions would be off-site (at an existing local pharmacy). • Horizon is committed to developing an appropriate Pharmacy Services Proposal. Commitment secured in the draft DCO s.106 agreement (An updated version of which will be submitted at Deadline 6 – 19th February).) • "Pharmacy Services Proposal" means the proposal demonstrating how the Developer will provide direct pharmacy prescription dispensation services for the non-home-based workforce personnel from Implementation for the duration of the

ExA Ref.	Question	Horizon's Response to Question	Comment
		Construction Period.	
Q2.10.34	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)?	WAST and NWFRS will be responsible for attending to incidents off the WNDA requiring such resources . The P&R and the Logistics Centre will have first aid <i>etc</i> in line with Health and Safety regulations.	
Q2.10.36	Provide a map of Ynys Môn showing of the percentage of Welsh speakers by ward.	The map showing the proportion of Welsh speakers (aged three and over) by ward in 2011 is provided in figure A-6 of the Welsh language Impact Assessment [APP-432].	This map does not present 2011 data on Welsh speakers age three and over using 'Can speak Welsh' data. Instead it combines all Welsh language skills as referenced in HNP's figure A-6 'NOMIS: Census 2011 [RD 10]: Welsh Language Skills (KS207WA). 'Welsh Language Skills includes various combinations of skills in Welsh including 'can understand spoken Welsh only' (See this link to an explanation on the NOMIS website: file:///C:/Users/kathr/Downloads/ks207wa%20(1).pdf) HNP's use of Welsh Language Skills data inflates the numbers and proportion of 'Welsh speakers' within a ward. HNP's Figure A-6 provides percentage ranges rather than a percentage for each ward. It is also difficult to read ward names on this map. IACC's map (REP2-167 and REP2-137) is more precise. It provides 2011 census 'can speak Welsh data' and provides a single percentage for each ward. All wards are clearly named.
Q2.10.38	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. 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.	Schedule 1, clause 9.2 of the draft DCO s.106 (shared with IACC and Welsh Government on 23.01.19) provides a commitment that Horizon, prior to implementation of the Wylfa Newydd DCO Project, will agree parameters for an annual evaluation of the impact of the Wylfa Newydd DCO Project on the Welsh language in the KSA. Horizon will thereafter undertake that annual evaluation in accordance with the approved parameters for the duration of the construction phase up to five years from the start of the operational period. In addition, Schedule 1 of the draft DCO s.106 (shared with IACC and Welsh Government on 23.01.19) commits to the following: Clause 1: Horizon will employ a Welsh Language and Culture Co-ordinator whose role will, among other things, be to: (a) focus on the development and implementation of Welsh language and culture mitigation and enhancements; (b) monitor, measure and evaluate language and culture related community benefit	Following its review of the developer's response to Q2.10.38, IACC welcomes, in principle, HNP's proposed monitoring strategy with regard to the Welsh language. IACC has set out its additional requirements for a more robust approach to monitoring in its response to Q2.10.38 as part of its submission to deadline 5 [REP5-057]. In addition, IACC submits a WCLMES Outline Monitoring and Evaluation Plan which provides further details (<u>See Appendix 1</u>).

ExA Ref.	Question	Horizon's Response to Question	Comment
		activities and associated mitigation measures; (c) sit on and report to the Welsh Language and Culture Engagement Group; • Clause 1.4: that Horizon will establish an internal Welsh Language Management Group from commencement until the end of the operational period, which will: (a) provide internal oversight of the Developer's Welsh language commitments and performance including its Welsh Language Policy; and (b) to assist the Welsh Language and Culture Coordinator in the delivery of the Welsh Language and Culture Mitigation and Enhancement Strategy. • Clause 1.6: comply with the Polisi Iaith Gymraeg/Welsh Language Policy which will inter alia require annual review. • Clause 5: in respect of Welsh language immersion requires ongoing monitoring by the Council and Horizon to determine whether additional teaching resource is needed; if set ratios are exceeded, contingency funding is released. • Clause 6: Horizon will fund an IACC Welsh Language Officer who will among other things contribute to the evaluation of the impact of the Wylfa Newydd Project on the Welsh language in the KSA. • Clause 10: Horizon and the IACC will constitute a Welsh Language and Culture Engagement Group. ◦ Clause 10.2 provides details of the membership of this group and chairmanship; and clause 10.3, the proposed duties and responsibilities of the group. These duties and responsibilities include monitoring the obligations set out in Schedule 1 of the Draft DCO s.106 in relation to Welsh language and culture, review monitoring responses and provide feedback to Parties on issues relating to Welsh language and culture. ◦ Timescales for monitoring and reporting to the Welsh Language and Culture Sub- Group are set out in clause 10.4 of the Draft DCO s.106.	

ExA Ref.	Question	Horizon’s Response to Question
Q2.10.39	1) Provide details of which of the various proposed S106 funds would contribute funding towards Welsh language and culture. 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	1) The following funds, as set out in Schedule 1 and Schedule 15 of the Draft DCO s.106 (shared with IACC and WG on 23.01.19) would provide funding toward mitigating and enhancing effects in relation to Welsh language and culture: • Welsh Language Education (Annual Contribution); • Welsh Language Education (Contingency) Fund; • Welsh Language Officer contribution; and • Community Translation Service Contribution. • SPC Welsh Language Contribution. These total £3,436,000 (indexed). 2) A break-down of the funding set out in 1) is provided below. This is as per Schedule 1 of the Draft DCO s.106 (shared with IACC and WG on 23.01.19). • Welsh Language Education (Annual Contribution) – £1,260,000 (indexed). This sum is allocated annually in the amounts set out in paragraph 4 of Schedule 1 (towards the funding of Welsh language teaching capacity to operate in the KSA, based on the estimated number of child dependents.. • Welsh Language Education (Contingency) Fund – £1,500,000 (indexed). this can be released when set teacher/pupil ratio are exceeded. • Welsh Language Officer contribution – £360,000 (indexed) (estimated based on a 9 year construction programme). This comprises an annual payment of £40,000 (indexed); • Community Translation Service Contribution - £250,000 (indexed). • SPC Welsh Language Contribution - £66,000 (indexed). This is to be paid by Horizon to IACC prior to commencement of the site preparation and clearance. This represents only the pure funding mitigation under Schedule 1 and 15 of the s.106 and

ExA Ref.	Question	Horizon's Response to Question	Comment
		not the full suite of non-financial and in-kind mitigation Horizon is proposing in the draft DCO s.106 agreement.	
Q2.10.40	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?	The methodology for undertaking the Welsh Language Impact Assessment (WLIA) [APP- 432] is set out in detail in section A.5 of the WLIA. The methodology was shared with member of the Welsh Language Impact Assessment Steering Group, who endorsed the proposed approach. IACC and Gwynedd Council are members of the WLIA Steering Group. It should be noted that Welsh Government does not prescribe or promote any particular methodology for conducting WLIA's. As observers of the Steering Group, Welsh Government therefore neither endorsed nor rejected the proposed methodology as set out in the WLIA.	IACC endorsed in principle HNP's use of Planning and the Welsh Language: The Way Ahead (2005) as a methodology for its Welsh language impact assessment since, despite its limitations, it provided the only 'off the shelf' methodology available. 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 are considerable weaknesses in the application of the methodology, as detailed in IACC's response to Q2.10.40 as part of its submission to deadline 5 [REP5-057] . An additional weakness is that HNP's WLIA does not acknowledge these limitations or seek to improve the methodology. Moving forward, it is essential that a more detailed, ward level, baseline language profile is established prior to commencement and monitored during the construction, operation and decommissioning cycles of the development. IACC has submitted an initial Language Profiling Data Report as a starting point in this regard within Local Impact Report – Annex 9A (REP2-137).
Q2.10.41	Have the possibilities of on-line training in the Welsh language been considered?	Horizon is obliged to develop and deliver workforce Welsh Language Training programmes and monitoring schemes, as set out in the draft DCO s106. Horizon consider this to be a matter to be developed for the implementation stage of the Project, when Horizon will consider different methods of Welsh language training delivery including online courses and applications.	It is appropriate that some use of on-line Welsh language skills training forms part of the staff Welsh language training program implemented as part of the developer's Welsh Language Skills Strategy. It would <u>not</u> be appropriate for the Welsh Language Awareness training to be conducted on-line due to its effectiveness being greater when individuals are given the opportunity to discuss these issues with others in a face-to face, group context.

Q2.11.1	Provide further details of the proposed park and share sites including: 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.	This question is for IACC, GCC and WG, however Horizon makes the following comment concerning the proposed Park and Share sites which are to be provided by third parties. Horizon is confident that its DCO application contains all of the necessary parking (onsite and at Dalar Hir) to meet the requirements of the Wylfa Newydd Project and minimise the traffic and transport impacts. However, Horizon will consider the use of the proposed Park and Share facilities (including as stops on the shuttle bus network, where demand exists) at Four Crosses, Gaerwen, Bangor and Caernarfon, on the basis that these Park and Share facilities are delivered by others, as a complementary component of the transport strategy for the Wylfa Newydd DCO Project.	The IACC would also note that Horizon have provided commitment to route buses through these Park and Share sites from Year 1, allowing workers who choose to use the sites to connect to buses for onwards journey to the WNDA. This is confirmed in Appendix 1-5 Early Years Strategy of Horizon's Deadline 5 Responses to actions set in Issue Specific Hearing on 8 January 2019 [REP5-054], whereby para 1.2.2 of Appendix 1-5 states "Shuttle buses would use the Park and Share sites proposed by others (e.g. site at Bangor proposed by Welsh Government) if they are available and demand arises".
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ExA Ref.	Question	Horizon's Response to Question	Comment
	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?		
Q2.11.2	Planning permission has been granted for the on-line highways works – when would work commence on site?	The A5025 On-line Highway Improvements will commence as soon as practically possible prior to any works consented under the DCO commencing.	The IACC requires all works related to the A5025 On-Line scheme to be fully delivered and operational as early as possible and prior to commencement of main construction. This is to ensure the resilience of the local road network, the structural capability of the A5025 to accommodate an increase in HGV traffic. Horizon has suggested a HGV cap to limit the traffic that can use the A5025 until the offline works open in order to protect communities. along the A5025 who would be directly impacted by construction traffic. IACC agree with the principle of a cap however as discussed at the ISH in January the level of that cap is not agreed. IACC suggests that cap should apply until both the online and offline works have been completed.
Q2.11.3	What is the maximum vehicle size that could cross the Menai Bridge?	This question is for IACC, GCC and WG, however Horizon makes the following comment. HGVs are physically able to cross the Menai Bridge, however due to the geometry, width, height, and weight restrictions, it is not considered appropriate for construction vehicles associated with the Wylfa Newydd DCO Project to use the Menai Bridge given the presence of the A55 Britannia Bridge to the south. This is why Horizon has identified the A55 as the prioritised route for construction traffic to/from the Wylfa Newydd Project as outlined in the Code of Construction Practice. In the event of an incident, North Wales Police may decide to divert HGVs via the Menai Bridge. Horizon would follow any instructions given by the North Wales Police in the event of an incident. A Traffic Incident Management Scheme is to be prepared for approval by IACC, in consultation with GCC, WG and NWP.	

ExA Ref.	Question	Horizon’s Response to Question
Q2.11.4	What would be the stacking arrangements for HGVs on the mainland in the event of Britannia Bridge closing?	In the event of the closure of Britannia Bridge, construction vehicles making deliveries to the Wylfa Newydd DCO Project would need to change their journey arrangements. Closures associated with weather events are typically forecast at least several days in advance. This means that the delivery arrangements on the affected days could be adjusted ahead of the expected closure to ensure that construction vehicles do not start their journey. The Wylfa Newydd DCO Project will maintain a stockpile of material to ensure that construction works can continue in the absence of the regular arrival of construction materials by road e.g. during the temporary closure of Britannia Bridge. In the event of an unexpected temporary closure of the Britannia Bridge, drivers in construction vehicles on the mainland travelling towards the Wylfa Newydd DCO Project would be informed of the closure using the Delivery Management Asset Tracking System (DMATS). Depending on their location they would be advised to stop at a safe location e.g. service stations on the motorway network. Other locations which could be used are the service areas and laybys located along the A55. A review of laybys along the A55 shows that there is capacity for approximately 100 to 150 HGVs to park in laybys on the westbound carriageway of the A55. There is also a service station with a parking area west of Conwy. Construction delivery vehicles travelling eastbound would be held at the WNDA or Logistics Centre in the event of an incident. Finally, a Traffic Incident Management Scheme is to be prepared by Horizon to cover situations such as the closure of Britannia Bridge. This Scheme will need to be approved by IACC, in consultation with NWP, GCC and WG. Given the ability to communicate with drivers of construction delivery vehicle, the availability of safe stopping places, the low frequency of unexpected closures of the Britannia Bridge, and the use of a Traffic Incident Management Scheme, the proposed arrangements are considered suitable for the management of construction vehicle deliveries to the Wylfa Newydd DCO Project.

ExA Ref.	Question	Horizon’s Response to Question
Q2.11.5	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 of the MOLF and the improvements to the A5025?	1) An abnormal load is considered to be any load that cannot be broken down into smaller loads for transport without undue expense or risk of damage. Movements of such loads are governed by: • The Road Vehicles (Construction and Use Regulations) 1986 (C&U) • The Road Vehicles (Authorisation of Special Type) General Order 2003 (STGO) This legislation requires notification to the police, with two clear days notice (excluding Saturdays, Sundays and Bank Holidays) before an AIL can use a road. When a load exceeds the maximum authorised weight for its class of vehicle, normally 44T, notification to Highways and Bridge Authorities, together with an indemnity, is also a necessity. A police escort is not required by law, but there must be an attendant vehicle. However, police involvement will be required where road closures and traffic direction is needed. 2) n/a 3) The updated Wylfa Newydd Code of Construction Practice (submitted at Deadline 4 (12 February 2019)) requires an AIL Management Scheme to be prepared and agreed by IACC, in consultation with GCC, WG and NWP. 4) AILs arriving by road prior to the opening of the MOLF and the improvements to the A5025 will follow the procedures to be set out in the AIL Management Scheme.

ExA Ref.	Question	Horizon's Response to Question	Comment
Q2.11.6	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? If yes could this be delivered by a suitably worded requirement?	A Hearing Action Point issued by the Examining Authority following the Socio-Economic and traffic and transport Hearing on Tuesday 8th January 2019 was for Horizon to give consideration to the need for an early years transport strategy. Horizon has done so through a separate note submitted at Deadline 5 (12 February 2019). In summary, Horizon proposes a range of measures in the early years including: 1. Shuttle bus network to transport construction workers to and from the Wylfa Newydd Project. 2. Car sharing for construction workers travelling to and from the Wylfa Newydd Development Area to reduce traffic flows on the A5025. 3. Hourly, daily and monthly caps on the number of construction vehicle movements on the A5025. 4. Restrictions on the hours when construction vehicles can travel to and from the Wylfa Newydd Project on the A5025 to avoid travel during school opening and closing times. Implementation of minor remedial highway workers in Llanfachraeth to help mitigate potential impacts of construction vehicle movements. If the MOLF were to be delayed then Horizon would continue to deliver material to the Wylfa Newydd DCO Project within the HGV caps specified in the Wylfa Newydd Code of Construction Practice. If the delivery of the MOLF were delayed by many months then Horizon would discuss potential alternative arrangements (e.g. use of Holyhead Port) with the IACC, Welsh Government and others. Similarly, if the A5025 Offline Highway Improvements were delayed, Horizon would continue to deliver material to the Wylfa Newydd Project within the HGV caps specified in the Wylfa Newydd Code of Construction Practice. Given the measures already secured, Horizon does not consider there is any need for further requirements to be provided to control and manage traffic movements during the early years of construction.	The IACC notes the range of measures included in the proposed Early Years strategy, however continues to strongly disagree with the proposed hourly, daily and monthly caps on the number of construction vehicle movements on the A5025 prior opening of the Off-Line bypasses. Please also see Appendix C of IACC's Deadline 6 submission in response to Horizon's Deadline 5 Response to actions set in Issue Specific Hearing Action on 8th January 2019: Appendix 1-3: Raw Data on the Existing Traffic Flows and Future HGV Growth on the A5025 and Appendix 1-5: Early Years Strategy.

ExA Ref.	Question	Horizon's Response to Question	Comment
Q2.11.7	The proposed road layout for accessing the Dalar Hir Park and Ride site would not currently comply with design guidance. Can you: 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.	▪ A draft revised layout for the entrance to the Dalar Hir Park and Ride site was tabled at the SOCG meeting with IACC on Friday 1 February 2018, IACC agreed that the draft layout was considered acceptable. • Following that meeting, Horizon is now amending the the general arrangement drawing for further discussion and agreement with IACC Highways team. This amended drawing will be issued to IACC the week commencing 11th Feb for agreement, with the intention that an agreed general arrangement drawing can be submitted into Examination at Deadline 6.	It is confirmed that the IACC are in agreement with the preliminary design for the revised access road into the Dalar Hir Park & Ride site, subject to the Detailed Design Information being submitted to the IACC for approval prior to commencement of works. The IACC expects the above requirement to be included within the Development Consent Order.
Q2.11.8	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. 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?	The Hinkley Point C transport strategy relies heavily on park and ride and direct buses to transport the vast majority of construction workers to/from the construction site on a daily basis. This reduces traffic impacts on the already congested highway network which exists between the Strategic Road Network (M5) and the construction site. Hinkley Point C includes limited on-site parking and temporary worker accommodation (500 beds on site and 1,000 beds off site). Car sharing is part of a sequential test at HPC that focusses on a bussing strategy and then on car sharing to park and ride sites. It does not form a major part of the Hinkley Point C transport strategy and targets only exist for travel to/from the park and ride sites. These targets are also only valid from the point when all the park and ride sites for HPC were operational (Autumn 2018). Therefore, the actual car share targets at HPC have not been fully reported and are still a target the Project aim to achieve. The transport strategy proposed for the Wylfa Newydd DCO Project is designed to reflect the local transport conditions which are very different to those experienced in Somerset. The transport strategy for the Wylfa Newydd DCO Project includes on-site Temporary Worker Accommodation for up to 4,000 of the 9,000 construction workers expected in the peak construction year. This removes the need to transport these construction workers to/from the WNDA on a daily basis. Another 1,630 workers are expected to travel by shuttle buses form local towns and the wider area. The remainder of the construction workers will travel with varying levels of car sharing to meet an average target of 2.0 workers per vehicle across the Project in the peak construction year. For a construction site in a rural location this is considered to be a highly sustainable transport strategy. 1) Levels are car sharing will be secured through the changes made to the Control Document CoCP, submitted at Deadline 2, which includes a commitment to an average of 2.0 workers per vehicle car share target for construction workers in the peak construction year. 2) Horizon's position is that this is an appropriate and sufficient as a securing mechanism and a further Requirement is not necessary. 3) To ensure these levels are achieved, the updated version of the CoCP submitted at Deadline 5 (12 February 2019) includes further detail on monitoring and enforcement of the transport strategy, including the actions that will be taken if targets are not being met. These include: • further promotion by Horizon of shuttle bus services and the Park and Ride facility; • further encouragement by Horizon for workers to use the shuttle bus service and Park and Ride facility; • Horizon to work with shuttle bus operators to amend routes, frequency and vehicle size of shuttle bus network so more construction workers can use the service; • Horizon to implement enhanced enforcement measures; and Horizon and IACC to agree revised mode share targets to reflect changes to underlying assumptions (for example, if more construction workers live in Holyhead than forecast then more construction workers could travel by shuttle bus rather than using the Park and Ride facility and mode share targets would need to be adjusted accordingly).	The IACC would re-iterate its stance that should car sharing levels fail to reach the agreed targets, sufficient funding should be available via the S.106 agreement, to enable the review, identification and implementation of contingency/additional measures to rectify issues/impact that has or may arise.

ExA Ref.	Question	Horizon’s Response to Question
Q2.11.9	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?	The traffic modelling for the assessment of the Wylfa Newydd DCO Project has included traffic that is being generated by the decommissioning of Wylfa A. This is stated in paragraph 5.2.5 of Appendix A of Appendix G Strategic Traffic Model – Overview [APP-108]. If these traffic flows were not included in the traffic modelling then this would reduce the baseline traffic flows which would then reduce the level of assessed traffic impacts stated in the DCO Transport Assessment [APP-101]. The exclusion of these traffic flows would also reduce the stated noise and air quality impacts as these use baseline traffic flows as inputs. It is therefore considered appropriate to include these traffic flows in the assessment of the Wylfa Newydd DCO Project to provide a robust and conservative assessment of traffic impacts.
Q2.11.10	Can you confirm whether the traffic modelling/Transport Assessment considered blue light response times and if not, why not.	There is no guidance that suggests that blue light response times are required to be considered in Transport Assessments in the UK. This issue has though been raised previously by the Emergency Services through the Statement of Common Ground process and Horizon’s position in the SoCGs is outlined below. The only area forecast to experience a substantial increase in journey times owing to Wylfa Newydd DCO Project traffic is over the Britannia Bridge in the peak hour of the peak year. The increased journey times over the Britannia Bridge in the peak hour of the peak year have been mitigated as far as practicable by the provision of the MOLF to remove up to 80% of construction material deliveries off the road, and by ensuring the worker shift start and end times do not coincide with AM and PM peak hours of traffic over Britannia Bridge as far as practicable. Furthermore the Britannia Bridge was originally designed as a 3-lane carriageway but currently operates as 2 lanes. Therefore there is sufficient width (10 metres) to allow a blue light response vehicle to pass over the bridge in the middle of the carriageway with relative ease. Other than the Britannia Bridge, all other areas of the highway network are not substantially impacted by Wylfa Newydd DCO Project traffic and therefore this should not adversely impact blue light response times, except for when roadworks are in place to construct the A5025 On and Off-line Highway Improvements where typical arrangements will be in place to

ExA Ref.	Question	Horizon’s Response to Question
		manage traffic. Highway working areas will be managed with temporary traffic management to limit potential impacts on blue light services. Standard practice for shuttle working arrangements will be followed. Traffic will be managed using a combination of temporary traffic signals or “stop / go” boards. Highway working areas will be a maximum of 300 metres in length. Two of the four highway working areas required for the A5025 On-line Highway Improvements would have the flexibility to expand to 600 metres (to allow for fewer joints in laying the surface course). A minimum separation distance of 0.5km between working areas will be maintained.
Q2.11.11	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	Although this question is for Gwynedd County Council, Horizon has the following comments to make. The impacts of construction delivery traffic and construction worker traffic associated with the Wylfa Newydd DCO Project have been assessed in detail in the DCO Transport Assessment. This includes an assssment of traffic flows between the hours of 06:00-09:00 and 15:00- 18:00 across Britannia Bridge using the VISSIM traffic modelling software. The peak hours within the period assessed in the VISSIM model are 08:00-09:00 and 17:00-18:00. The traffic impacts of the Wylfa Newydd DCO Project during the peak hour of the peak construction year are considered to be such that no additional mitigation is required other than that already proposed as part of the DCO application. The worker shift timings (which are controlled via the Code of Construction Practice) have been chosen to ensure that construction worker travel does not occur in the AM and PM peak hours as far as practicable. As has been demonstrated via the VISSIM sensitivity tests provided to GCC as part of the Statement of Common Ground process, significant changes in assumptions, such as doubling the proportion of workers living on the mainland (and thus travelling across the Britannia Bridge), do not correlate to substantial changes to the VISSIM traffic modelling results. This is because the shift timings keep traffic off the highway network during the AM and PM peak hours. The controls on shift timings for construction workers, along with the mode share targets for construction worker travel which are included in version of the CoCP submitted at Deadline 5 (12 February 2019), will help ensure that actual traffic impacts will reflect the impacts presented in the DCO Transport Assessment [APP-101].

ExA Ref.	Question	Horizon's Response to Question	Comment
Q2.11.12	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?	The preamble to the Active Travel (Wales) Act 2013 explains that the Act makes provision for: i. the mapping of active travel routes and related facilities for and in connection with integrated network maps; ii. securing that there are new and improved active travel routes and related facilities; iii. requiring the Welsh Ministers and local authorities to take reasonable steps to enhance the provision made for, and to have regard to the needs of, walkers and cyclists; and iv. requiring functions under the Act to be exercised so as to promote active travel journeys and secure new and improved active travel routes and related facilities and for connected purposes. To this end, the Act introduces a number of obligations on the Welsh Government and local authorities designed to achieve the above. For example, section 9 provides that <i>"the Welsh Government, and each local authority must, in the exercise of their functions under Parts 3, 4, 5, 9 and 12 of the Highways Act 1980 (creation, maintenance and improvements of highways, interference with highways and acquisition etc. of land), in so far as it is practicable to do so, take reasonable steps to enhance the provision made for walkers and cyclists"</i>. Similarly, section 10 provides that <i>"the Welsh Ministers and local authorities must exercise their functions under this Act in a manner designed to (a) provide active travel journeys; and (b) secure new active travel routes and related facilities and improvements in existing active travel routes and related facilities"</i>. The obligations under this Act quite clearly fall on the Welsh Ministers and local authorities. Horizon as a private company is not subject to these requirements. Nevertheless, Horizon accepts that it is appropriate for IACC as the Highway Authority to have regard to the obligations set out in this Act when exercising its powers as Highway Authority in respect of the Wylfa Newydd DCO Project. For that reason, matters of active travel have been discussed by Horizon and IACC throughout the design process of the A5025 Highway Improvements. For example, while there is no existing formal cycle provision along the A5025, there are sections of cycleways that cross or divert along the A5025 at various locations. As such, the A5025 On-Line Highway Improvements (which sit outside the DCO Application) take these into account and seek to improve access/connectivity. In respect of the A5025 Off-Line Highway Improvements, it was considered that provision of new active travel facilities alongside the new bypasses would be difficult to justify from a land-take perspective. Furthermore, the A5025 Off-Line Highway Improvements would have the effect of considerably reducing vehicle movements along the existing highway network, thereby improving conditions for non-motorised users along those networks. Horizon also took the provisions of this Act into account when conducting its environmental assessment, as detailed below. The assessment of effects on pedestrians and cyclists set out in chapter C3 of the ES takes into account the Active Travel (Wales) Act 2013. These categories of road users have been split into 'on-shore recreation' and 'active travel', though the potential impacts are broadly similar, arising from the increased traffic flows. The assessment, therefore, took into account commuter routes to Holyhead and Valley (as designated localities), as well as other potential active travel journeys that could be undertaken between communities and facilities and those active travel journeys undertaken for recreational purposes. Existing provision for these road users was taken into account. The highway was assigned a range of values, from high value for routes within communities and key routes to school, medium value for on-road sections of the National Cycle Network and the Tour de Môn cycle race route, and low value for other sections of the A5025.	Discussions are on-going between the IACC and Horizon on potential funding via the S.106 agreement to identify and deliver infrastructure provision/improvements for Non-Motorised User's on routes adjacent, near or adjoining the A5025 between Valley and Wylfa.

ExA Ref.	Question	Horizon’s Response to Question		Comment
		Recreational Cyclists and Pedestrians		
		Junction 2 of the A55 to Logistics Centre	• Designated Cycle Route (Lôn Trefignath) – medium value – recreational cyclists and pedestrians • Road – negligible (due to existence of Designated Cycle Route – recreational cyclists and pedestrians	
		Junction 4 of A55 to Park and Ride	• Low value for recreational walkers and cyclists	
		Junction 3 of the A55 to Wylfa Newydd Development Area	• NCN Routes and the Tour de Môn route – medium for recreational cyclists and pedestrians • Other sections – low value (due to existing traffic flows) • Minor roads joining A5025 – low value for recreational cyclists, medium value for recreational walkers	
		Active Travel Cyclists and Pedestrians		
		Junction 2 of the A55 to Logistics Centre	• Existing cycleways and footways – medium value • Road pavement – assumption that cyclists and pedestrians would use the provision available	
		Junction 4 of A55 to Park and Ride	• Low value	
		Junction 3 of the	• A5 – medium value (within commuter distance to	

ExA Ref.	Question	Horizon's Response to Question			Comment
		A55 to Wylfa Newydd Development Area	designated locality – Valley and Holyhead from Caergeiliog) • A5025 near Valley – negligible – NCN route from Llanynghenedl available as alternative • A5025 sections through communities of Llanfachraeth, Llanfaethlu, Llanrhyddlad and Tregele – High Value • NCN Routes (NCN Route 566 and 5) – medium value • A5025 between Ysgol y Llan and Llanrhuddlad and Rhydwyn high value for pedestrians, medium value for cyclists		
		Based on the varying values of the sections of highway the assessment of effects along the road differs from negligible to moderate adverse for both recreational and active travel cyclists and pedestrians. In view of the above Horizon is of the opinion that the Active Travel (Wales) Act 2013 has been considered as far as is necessary as part of the DCO application. The Act's implications for the Wylfa Newydd DCO Project have been assessed in Chapter C3 of the submitted ES [APP-090], with additional mitigation identified where appropriate and the residual effects considered within acceptable levels.			

ExA Ref.	Question	Horizon's Response to Question	Comment
Q2.11.13	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?	The assessment of the traffic impacts of construction vehicle movements associated with the Wylfa Newydd DCO Project has been based on monthly forecasts of the volume of material required in each month on construction. This information was used to prepare the profile of construction vehicle movements presented in Figure 7-6 of the DCO Transport Assessment [APP-101]. This means that the transport analysis is based on average vehicle movements over a month and that minor day-to-day variations in the use of the MOLF (e.g. due to wind or sea conditions preventing use of the MOLF) do not affect the number of assessed construction traffic movements using the road network. If there is an ongoing problem with the use of the MOLF then the stockpiling of materials at the Wylfa Newydd Development Area will ensure that construction works can continue. In addition, it should be noted that even if there are delays or restrictions in the use of the MOLF, the hourly, daily and monthly caps on the number of construction vehicles which make deliveries to the Wylfa Newydd DCO Project remain in place as per the restrictions provided in the Code of Construction Practice. All this means that the availability of the MOLF should not affect the transport assessment presented in the DCO Transport Assessment [APP-101].	The IACC notes Horizon's proposal of stockpiling materials at the WNDA to ensure construction continues should the MOLF be unavailable. Horizon also confirm the hourly, daily and monthly caps on the number of construction vehicles which make deliveries to the Wylfa Newydd DCO Project shall remain in place as per the restriction provided in the CoCP. The IACC would once again re-iterate its disagreement with the proposed hourly, daily and monthly caps on the number of construction vehicle movements on the A5025 prior opening of the Off-Line bypasses which are too high and should be reduced to the levels suggested by the IACC. Please also see Appendix C of IACC's Deadline 6 submission in response to Horizon's Deadline 5 Response to actions set in Issue Specific Hearing Action on 8th January 2019: Appendix 1-3: Raw Data on the Existing Traffic Flows and Future HGV Growth on the A5025 and Appendix 1-5: Early Years Strategy.

ExA Ref.	Question	Horizon's Response to Question	Comment
Q2.11.14	The IACC, GCC and WG have all raised concerns regarding the potential for 'fly parking'. How do you propose to deal with this matter?	As set out in the Wylfa Newydd CoCP submitted at Deadline 5 (12 February 2019), Horizon commits to manage, monitor and regulate the availability of car parking spaces to reflect the number of workers on the Wylfa Newydd DCO Project, balancing an over-provision of car parking (which could encourage car travel) with an under-provision of car parking (which could encourage fly parking). If fly-parking does occur, the management of fly parking is considered in the Workforce Management Strategy [updated version submitted at Deadline 5]. This states in paragraph 2.4.4 that <i>"Any personnel found to be parking outside designated areas (or 'fly parking') will be disciplined."</i> This principle will be included in the Code of Conduct that construction workers will be required to sign and adhere to during their employment on the Wylfa Newydd DCO Project. The updated version of the Wylfa Newydd Code of Construction Practice submitted at Deadline 5 states that all suspected incidents of fly-parking will be investigated by Horizon within 5 working days of the initial complaint being submitted to Horizon. Therefore if construction workers are found to be fly-parking, this will be considered a breach of the Code of Conduct and they will be disciplined.	The IACC strongly disagrees with Horizon's proposal to only investigate suspected fly-parking incidents within 5 working days of the initial complaint being submitted. Horizon should commit to allocating appropriate resource to investigate suspected fly-parking incidents within a much shorter timescale. The IACC would consider the following timescales more appropriate to ensure fly-parking incidents are monitored and enforced efficiently and in a timely manner to minimise the undue stress caused to the local community:- • Suspected fly-parking incidents to be fully investigated preferably on receipt of the complaint when the vehicle is in-situ but in any case within 1-2 days of receiving the initial complaint (7 days a week). • Appropriate disciplinary actions to be completed as soon as reasonably practicable having regard to the applicable procedures which may include temporary suspension or permanent removal from the project due to continual failure to adhere to the commitments set out in the Wylfa Newydd CoCP.

ExA Ref.	Question	Horizon's Response to Question
Q2.11.15	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 result in different outputs?	1) Traffic data was collected over several years as the scope of assessment was increased in agreement with and to reflect stakeholder comments. Accident data for 1 January 2011 to 31 December 2015 inclusive was used, the most recent complete five-year calendar period for which data were available at the time the assessment was completed. Accident data for each calendar year is usually released during the following September but 2016 data was delayed several times during 2017, consequently the accident analysis could not be updated to contain more recent data before the Transport Assessment was finalised. 2) Traffic data collected for the project during 2017 was used in the traffic modelling where applicable. All traffic data used is set out in App C2-4 - DCO TA Appendix D - Traffic Data Report [APP-105]. With regard to older traffic survey data used, more recent data would require new surveys, and would not change the outcome of the Transport Assessment as explained below. Regarding accident data, more recent accident data is now available, with accident records available up to and including 2017. 3) Using a selection of DfT data points across the Isle of Anglesey, the average change in total daily traffic from 2014 to 2017 is 1%. All data collected before 2016 was factored up to a 2016 baseline for the Strategic Traffic Model, based on growth of approximately 1% per annum (the growth factors used are outlined in the DCO Transport Assessment [APP-101] and follow standard industry guidelines). Therefore the growth factors applied to the 2014 and 2015 traffic data represent a robust scenario as traffic growth has occurred at a slower rate than that assumed in the DCO Transport Assessment. Regarding accident data, a comparison exercise has been undertaken between the most recently reported accident data (from 2016 and 2017) with the same data from earlier years included in the DCO Transport Assessment (2011 to 2015). Table 1 below compares data from the years 2016 and 2017 with the period from 2011 to 2015.

ExA Ref.	Question	Horizon’s Response to Question Table 1			
			Year	Isle of Anglesey reported accidents	Gwynedd reported accidents
			2011 to 2015 (average per yr)		
				108	264
			2016	71	178
			2017	72	182

		The reported number of accidents for 2016 and 2017 is substantially reduced compared with the years 2011 to 2015 in the local authority areas where the Wylfa Newydd Project is based (the Isle of Anglesey and Gwynedd). The accident and road safety assessment submitted in the DCO application can therefore be considered to be a conservative assessment.
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ExA Ref.	Question	Horizon’s Response to Question
Q2.11.16	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?	The definition of "commence" in article 2 of the dDCO includes a list of works which will not constitute commencement of the authorised development. This definition takes the approach of set out in section 155 of the Planning Act 2008, which incorporates the definition of "material operation" from the Town and Country Planning Act 1990. The works included within this definition comprise various site establishment works including, for example, vegetation clearance, environmental surveys and monitoring, or diversion or laying of services. These works have been included within the definition because they are not considered to have any significant environmental effects or result in a significant number of vehicle movements. Nevertheless, as noted in the Explanatory Memorandum [REP2-023] these excluded works will still be controlled by the Wylfa Newydd CoCP and relevant sub-CoCPs. Compliance with these documents are secured through the DCO Requirements in Schedule 3 of the DCO.

ExA Ref.	Question	Horizon's Response to Question	Comment
Q2.11.17	The traffic proposals are predicated on the basis that the majority of 'bulk materials' would be delivered by the MOLF. 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?	Under Requirement WN27 of the Draft DCO (an updated version of which has been submitted at Deadline 5 (12 February 2019)) Horizon must ensure that during construction of the authorised development at least 60% of all bulk materials required for the construction of the Power Station Works are delivered via the Marine Off-Loading Facility (Work 1) 'Bulk material' therefore does not need to be defined as the requirement is based on all construction materials 2) The requirement for 60% is cumulative across the construction period as a whole. 3) This requirement will be monitored using the Delivery Management Asset Tracking System (DMATS) for deliveries made by road and using the delivery records associated with deliveries made using the MOLF. This information will be regularly reported to IACC and the Transport Engagement Group as will be specified in section 5.8 of the Code of Construction Practice to be updated at Deadline 5. Failure to meet this requirement would be a breach of the DCO.	
Q2.11.18	NWP advocate the need for a construction traffic management plan and an operational traffic management plan. 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?	All the measures that would normally be found in a Construction Traffic Management Plan have been incorporated into the updated Code of Construction Practice submitted at Deadline 5 (12 February 2019). Similarly, all the measures that would normally be found in an Operational Traffic Management Plan are provided in the updated Code of Operation Practice submitted at Deadline 5 (12 February 2019). This update includes a commitment to target an average of 1.5 workers per vehicle during the operational phase of the Project. This means that additional control documents are not considered necessary as all the relevant controls are provided in the updated control documents.	The IACC disagrees with Horizon's response. The CoCP lacks any meaningful detail compared to what would be contained within a typical Construction Traffic Management Plan (CTMP). The IACC have repeatedly discussed the need for a CTMP for each section of the A5025 Off-Line bypasses at recent Transport meetings with Horizon. This issue currently remains on-going in the latest draft version of the Statement of Common Ground.
Q2.11.19	Would the additional buses needed to transport workers from Cae Glas and Kingsland effect the outputs of the	This question is for Land and Lakes, however Horizon makes the following comment: The Land and Lakes site does not form part of the Wylfa Newydd DCO Project. As stated in	

ExA Ref.	Question	Horizon's Response to Question
	Transport Assessment/traffic modelling?	Horizon's Response to Action Points set in the Issue Specific Hearing on the 8 January 2019 [REP4-008], submitted at Deadline 4 (17 January 2019) locating workers at Cae Glas and Kingsland would affect the results of the traffic modelling provided in the DCO Transport Assessment. This is because locating workers at Cae Glas and Kingsland (rather than at the Temporary Worker Accommodation) would require workers to travel each day in shuttle buses from these locations to the Wylfa Newydd Development Area (and other locations) rather than the construction workers travelling within the WND A to/from the Temporary Worker Accommodation, as proposed in the submitted Wylfa Newydd DCO Project, resulting in no traffic impacts on the local highway network. As explained in [REP4-008], the analysis provided by Land and Lakes in the Curtins report [REP2-248] on transport planning matters is inaccurate and flawed.
Q2.12.1	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. Can the Applicant and NRW come to an agreed position?	Horizon accepts NRW's position that there are uncertainties about the reflected wave conditions and changes to hydromorphology in relation to sediments at Cemlyn Bay despite Horizon's conclusion that there will be no significant effect. Horizon and NRW have agreed that further data collection and modelling would not address these uncertainties. Therefore, Horizon will develop a monitoring and mitigation programme that Horizon understands, once it is agreed with NRW, would address the level of uncertainty and allow a conclusion of no effect on site integrity. The Marine Works Sub CoCP submitted at Deadline 5 (12 February) provides the principles of a coastal process monitoring and mitigation strategy. It is expected this will be developed further with NRW post DCO consent as part of the Marine Licence for which NRW are the discharging authority.
Q2.12.2	At the ISH on 11 January 2019, the Applicant [REP4-004, page 10] agreed to consider what additional detail can be	The Construction Method Statement has been updated to include details on shoreline protection and will be submitted into Examination at Deadline 5 (12 February 2019).

ExA Ref.	Question	Horizon's Response to Question
	included within the Construction Method Statement to provide further details on shoreline protection. At what stage will these details be available?	Horizon will also submit into Examination at Deadline 5 a technical note titled ' <i>Causeway removal and pollution prevention</i> ' to address the the Examining Authority's questions raised at the ISH on Biodiversity).
Q2.12.3	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?.	Horizon met with NRW on 4 February 2019 to discuss a monitoring and mitigation programme and adaptive management approach to coastal processes. Following this meeting Horizon has secured the principles of a coastal processes monitoring and mitigation strategy in the updated Marine Works Sub CoCP submitted at Deadline 5 (12 February). Horizon will develop further details on the monitoring and mitigation programme with NRW and provide an update at Deadline 6 (19 February 2019). The final monitoring and mitigation strategy will be approved by NRW under the Marine Licence.
Q2.13.1	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).	The overall Project programme is predicated on a series of assumptions based on site conditions, quantities of commodities and equipment to be installed, and productivity. ▪ One assumption related to productivity is the number of hours that a worker is actively engaged in the completion of tasks related to that work (rather than the total time the worker is present at the work site). By having an overlapping shift, the overlap reduces the availability of the work force to actually do work. ▪ The previously proposed shift overlap would have resulted in an unacceptably high density of resource at the workface during the shift change over period, leading to potential safety and loss of productivity issues as workers compete for support resources (crane time, concrete delivery, tools etc.). • This includes one shift handing over the work, exiting the work area, and includes transferring any equipment to the next shift to carry on with the job. Having two shifts in one area creates a condition that one or both of the shifts would be unproductive and inefficient due to the sheer numbers of workers within an area, competition for

ExA Ref.	Question	Horizon's Response to Question
		resources (i.e. tools). This also leads to a congested work area and potential safety concerns (which ultimately results in work being undertaken at a slower pace or subject to more stop work events due to accidents). Having a break between each shift ensures the most efficient way of working by having clear stop and start points for the physical work and allow for the required safety and pre-task briefs for the start of the shift uninterrupted by the previous shift. In addition to the on-site work, it does not allow the various facilities to be adequately utilized, and taxes the limits that are set out in other portions of the DCO, such as the amount of available parking, welfare space, bussing turn-around time, access and egress of the site when both shifts occupy the facilities at the same time. • Horizon considers the optimization of resource in congested workspace offered by the revised shift arrangement has a huge productivity benefit particularly in a project of this size and complexity. Consequently a clear break between the end of one shift and the start of the next allows for the shifts to change over in an organized, safe and efficient manner.
Q2.13.2	If the proposed change to shift patterns would improve productivity how would this affect the timetable for the delivery of the proposed project?	The construction schedule is not affected by the proposed change to Shift Patterns. The proposed alternative shift patterns are required to maintain the current schedule.. This increase in the productivity of the construction workforce as a result of the changes to the shift patterns will ensure that an appropriate level of flexibility and resilience can be built into the construction programme so Horizon can better accommodate unforeseen events.

ExA Ref.	Question	Horizon’s Response to Question
Q2.13.3	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?	The shift pattern is intended to apply to workers based at the WNDA or where operation of associated development sites is 24/7 (i.e. the Logistics Centre and the Park and Ride facility (although typical hours for the Park and Ride would be 06:00 to 20:00)). This shift pattern is not really relevant to the construction of the associated development sites because, as noted in the sub-CoCPs, construction of the associated development sites is generally set between 07:00 to 19:00 Monday to Friday, and 07:00 to 13:00 on Saturdays. In addition the number of workforce involved in these sites are quite low, totalling 416 workers and so the additional traffic of those workers on the local network would be minor. For those reasons, the number of shifts and the night time shifts are not relevant to construction workers on the associated development sites. However, Horizon anticipates that the majority of these workers would transition to the WNDA and so would become subject to the proposed shift patterns at that point.

ExA Ref.	Question	Horizon’s Response to Question
		the smaller percentage of the workforce.
Q2.13.5	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 thequestion above) on site for an hour between 06:00 and 07:00 and for an hour/hour and a half between 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?	At no time will the workforce ever be employed on site unsupervised by management as has been suggested by this question. With regards the specific issues raised, Horizon’s response follows: 1) The patterns identified in the proposed change are intended to represent the primary shift patterns that reflect the worst-case assessment. Activities that will be working 24/7 would fall into three categories: • Marine works • Construction-related: for example, such activities as large continuous concrete placements for technical reasons, installation and maintenance activities, testing (i.e. Non-Destructive testing, hydro testing, and pipe and tank flushing), pre-operational testing and start-up testing and final commissioning of the units. • Service-related: for example, cleaning, security and catering services etc. All of these activities would require staffing 24/7. 2) The anticipated number of workers involved in these 24/7 activities would typically be around 15% of the overall workforce . However, to provide an indicative figure, Horizon considers this would be approximately 1300 workers, comprising of 850 construction-related workers and 450 service-related workers. 3) The shift patterns would be variable and would be defined by the scope of work assigned including when in the programme that the critical and overlapping activities may need to occur. It is not possible at this stage of the Project to give this level of detail but as the number of works or persons involved in these works would be relatively minor (as outlined in response to Further Written Question Response 2.13.4), it is not anticipated that their shift pattern will have any impacts on the local road network or nearby receptors.

ExA Ref.	Question	Horizon's Response to Question	Comment
Q2.13.6	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?	1) Shift start times are applicable to the time that the worker is on the WNDA site, has cleared security, and has transitioned to the welfare facilities and has changed into the specified workwear/protective clothing. The worker will clock-in at a specified point before travelling to the workplace. The clocking-in point represents the point at which a worker will commence their shift as defined within the National Agreements. 2) Workers are responsible for getting themselves to site for the commencement of each shift. The worker will be expected to plan their travel to site using the arrangements set out in the DCO. The time taken for each worker to get from the Park and Ride facility to the WNDA has been factored into the transport modelling and a physical trial was undertaken to confirm that the travel time allowed is reasonable and achievable. However, it is up to the individual worker to ensure he arrives at the Park and Ride in a timely manner so that there is sufficient time to complete the journey to site and clear on-site requirements (security, welfare facilities, change into the approved work clothing) before the agreed shift start time.	Modelling does not account for travelling to the Park & Ride. IACC reiterates its concern that a 10/10.5 hour shift does not take into account the travel time to the WNDA. On the basis of a TTWT which could extend to 90 minutes, IACC has concerns that there would be a prospect of increased accidents, both at work and travelling to and from work. Research suggests (RoSPA) that there is a correlation between long hours culture and accidents, ill health and low productivity.

ExA Ref.	Question	Horizon's Response to Question	Comment
Q2.13.7	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 shifting timings for construction workers have been defined so that travel by workers avoids peak hours on the highway network and particularly the peak hour of travel across the Britannia Bridge. The additional traffic generated by construction workers is therefore expected to occur away from the current peaks of travel on the road network. This could mean that the duration of peak conditions is extended as construction traffic travels on the 'shoulders' of the peak. Although this would extend the duration of peak conditions, traffic impacts are not expected to be greater than during the peak hour. In addition, this effect has been modelled using the VISSIM model of Britannia Bridge which models a period from 06:00 to 09:00 and 15:00 to 18:00 i.e. time periods which cover the peak hour and the build-up to the peak hour. This is set out in Appendix 1-2 of the Request for Non-Material Change (RfNMC) no.3 [REP4-011]. This means that the conclusions of the DCO Transport Assessment [APP-101] are considered to remain robust.	
Q2.13.8	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.	The assessment of the materiality of the proposed change is set out in the change request submitted at Deadline 4 [REP-011]. Horizon considers, following its extensive assessment, that the proposed change is non-material (both individually and cumulative with the other change requests).	IACC remain of the opinion that the change proposed is material when considered both individually and cumulatively.

ExA Ref.	Question	Horizon's Response to Question	Comment
Q2.13.9	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?	▪ The economic consequences would be related to the potential effect on the construction programme if the proposed working hours only became effective after the completion of both the A5025 On-Line and Off-Line Highway Improvement Works. ▪ Building resilience into the construction programme is a key driver for this change, a delay to these proposed hours coming into effect would reduce the ability of the Project in those first two years to respond and accommodate unforeseen or adverse events (such as delays or bad weather events.) ▪ As the delivery of key mitigations (including the MOLF and the Temporary Worker Accommodation, as well as earthworks and site set-up on the WNDA) are scheduled for the first two years, it is these activities that could be at risk if this resilience is not built into the construction programme. This could also have knock-on effects to other parts of the Project (i.e. if the construction of the MOLF runs over, then Horizon must continue to comply with pre-MOLF restrictions on HGV movements which would restrict deliveries for other construction works on the WNDA). Any delays caused by the lack of resilience could therefore impact the construction programme and have a significant economic cost.	
Q2.13.10	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?	▪ It is assumed that periods when the MOLF is not operational due to bad weather will be of relatively short duration. ▪ If Horizon did need to redirect some of the MOLF deliveries via the road network, these deliveries would be transferred from the ship to an HGV at a suitable port. The logistics team would then manage deliveries to WNDA ensuring that the numbers are within the limits for HGV movements within the DCO application. The overall HGV numbers would not change and the caps set out in the Wylfa Newydd CoCP would apply. In the revised Wylfa Newydd CoCP submitted at Deadline 5, at section 5.8.3 Horizon has committed to limiting the number of HGV movements by road so as not to exceed 40 HGVs in each direction (80 movements in total) per hour and 160 HGV deliveries in each direction (320 total movements) per day and a monthly average of [3500] each direction or 7000 total movements per month. Lower caps apply before the A5025 Offline Highway Improvements have been completed. The changes to the HGV delivery windows in the Request for Change provide the opportunity to Horizon to fully utilise the permitted HGV movements in the extended delivery windows to mitigate against potential programme delays. For example during periods of bad weather, which could result in MOLF closure Horizon could utilise spare capacity (within the HGV caps) during the day or evening to make the deliveries by road. This spare capacity exists because the HGV delivery figures are all predicated on worst case requirements to ensure that the traffic and environmental impacts are fully considered. There may therefore be periods during the construction when the HGV deliveries will operate at levels marginally below the HGV caps. This provides some spare HGV delivery capacity in the extended delivery windows to mitigate against potential programme delays.	The IACC continues to strongly disagree with the proposed hourly, daily and monthly caps on the number of construction vehicle movements on the A5025 prior to opening of the Off-Line bypasses. Please also see Appendix C of IACC's Deadline 6 submission in response to Horizon's Deadline 5 Response to actions set in Issue Specific Hearing Action on 8th January 2019: Appendix 1-3: Raw Data on the Existing Traffic Flows and Future HGV Growth on the A5025 and Appendix 1-5: Early Years Strategy.

ExA Ref.	Question	Horizon's Response to Question
Q2.13.11	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. 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.	1) The RfNMC seeks to extend the available window for HGV deliveries to the site. This ensures that an appropriate level of flexibility and resilience can be built into the construction programme. The proposed change enables Horizon to accommodate unforeseen events or accidents which may otherwise result in prolongation of the overall build programme by providing the ability on a day to day basis to reschedule HGV deliveries within the extended delivery hours thus mitigating the risk of accumulative schedule delays. Restrictions associated with security clearing up to 160 HGVs per day vehicles and the need to implement complex processes for unloading sensitive equipment can also be managed more effectively to avoid delays to the current construction programme. 2) Improving the resilience and flexibility of HGV deliveries means that schedule delays can be avoided and that the need to utilise any inbuild schedule contingency is minimised, hence affording the best opportunity to deliver an on time or better commercial operation datea And meet the urgent need for new nuclear has been firmly established in National Policy Statements EN-1 [RD2] and EN-6 [RD3]. 3) The following visualisation is intended to demonstrate how the inclusion of evening and Saturday morning deliveries can provide flexibility and resilience. Under the existing DCO arrangements proposed in the DCO a delay of half a day (normal for any RTC) would reduce the possible daily deliveries on that day by up to 70 vehicles. To mitigate we would need to increase HGV in the deliveries in the remaining part of the day or carry forward to following

ExA Ref.	Question	Horizon's Response to Question	Comment																																																																														
		day. The current arrangement leaves very limited flexibility to achieve this when combined with the constraints identified above are most likely to result in a requirement to prolong the delivery schedules. Under the proposed HGV delivery arrangement we have an extended evening and Saturday mornings delivery window that provide significant opportunity to maintain the required weekly delivery volumes thus providing an appropriate level of flexibility and resilience. HGV movements based on current working hours <table><tr><td>6:00</td><td>7:00</td><td>8:00</td><td>9:00</td><td>10:00</td><td>11:00</td><td>12:00</td><td>13:00</td><td>14:00</td><td>15:00</td><td>16:00</td><td>17:00</td><td>18:00</td><td>19:00</td><td>20:00</td><td>21:00</td><td>22:00</td><td>23:00</td><td>Total HGV's</td></tr><tr><td colspan="2">Day Shift</td><td>8</td><td>18</td><td>18</td><td>18</td><td>8</td><td>18</td><td>18</td><td>18</td><td>18</td><td colspan="2">Day Shift</td><td></td><td></td><td></td><td></td><td></td><td></td><td>158</td></tr></table> Day shift arrive no HGV's HGV's leave logistic centre at 08:00 and travel to site Reduced capacity at lunch Day shift leaves site reduced HGV's HGV movements based on proposed weekday working hours <table><tr><td>6:00</td><td>7:00</td><td>8:00</td><td>9:00</td><td>10:00</td><td>11:00</td><td>12:00</td><td>13:00</td><td>14:00</td><td>15:00</td><td>16:00</td><td>17:00</td><td>18:00</td><td>19:00</td><td>20:00</td><td>21:00</td><td>22:00</td><td>23:00</td><td>Total HGV's</td></tr><tr><td colspan="2">Day Shift</td><td>8</td><td>15</td><td>15</td><td>15</td><td>8</td><td>15</td><td>15</td><td>15</td><td>15</td><td colspan="2">Day Shift</td><td>8</td><td></td><td>20</td><td></td><td></td><td></td><td>157</td></tr></table> Day shift arrive no HGV's HGV's leave logistic centre at 08:00 and travel to site Reduced capacity at lunch Day shift leaves site reduced HGV's Maximum of 20 HGV's in the evening	6:00	7:00	8:00	9:00	10:00	11:00	12:00	13:00	14:00	15:00	16:00	17:00	18:00	19:00	20:00	21:00	22:00	23:00	Total HGV's	Day Shift		8	18	18	18	8	18	18	18	18	Day Shift								158	6:00	7:00	8:00	9:00	10:00	11:00	12:00	13:00	14:00	15:00	16:00	17:00	18:00	19:00	20:00	21:00	22:00	23:00	Total HGV's	Day Shift		8	15	15	15	8	15	15	15	15	Day Shift		8		20				157	
6:00	7:00	8:00	9:00	10:00	11:00	12:00	13:00	14:00	15:00	16:00	17:00	18:00	19:00	20:00	21:00	22:00	23:00	Total HGV's																																																															
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Day Shift		8	15	15	15	8	15	15	15	15	Day Shift		8		20				157																																																														
Q2.13.12	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?	Noise resulting from construction traffic using the A5025 will be mitigated through a combination of embedded, good practice and additional mitigation measures. The mitigation measures include sections of low noise surfacing and also the provision of noise barriers along the proposed bypass at Llanfachraeth. Under the proposed request for change in relation to HGV Movements [REP4-013] there will however remain some residual construction traffic noise effects with the potential to adversely affect certain properties along the road transport access routes to the Wylfa Newydd Development Area. The range of residual effects ranges from those which are only just perceptible (e.g. a short term change in road traffic noise of 1 dB LA10,18h is the smallest	Horizon have adopted the 63 dB LAeq ,16 hours rather than the NIR1975 (aa 1988) limit of 68 dB LAeq ,16 hours. Thus demonstrating a lower level at which eligibility can be granted for the LNMS. Horizon's rationale for this is based on judgement that (a) residents can close windows and that (b) the noise will relate to construction traffic; of which they describe as temporary. IACC agree with this reasoning and the approach to the CRTN and NIR 1975 (aa 1988) assessments and conclusions.																																																																														

ExA Ref.	Question	Horizon's Response to Question	Comment
		that is considered perceptible) to effects which are likely to lead to a resident modifying their behaviour (e.g. closing the window to talk, concentrate or sleep) and which may increase the risk of health effects; such effects at the upper end of this range would be considered unacceptable. It is frequently the case that highway improvement schemes result in residual effects which cannot be mitigated through design for technical or economic reasons. For example, the effects of short noise barriers can be largely negated by noise travelling around the ends, and so noise barriers generally only provide significant benefits when they completely block the line of sight to the entire stretch of road that is visible from the receptor. In many cases, such as sections through villages, there is simply insufficient space to provide noise barriers, or safety concerns which prevent them from being installed. The effectiveness of noise barriers also diminishes with distance from the road. As part of the work supporting ES Volume C - Project-wide effects C5 - Noise and vibration effects of traffic [APP-092] and the request for change in relation to HGV movements [REP4-013], Horizon has examined the value for money of providing additional noise barriers at various locations, including longer barriers at Llanfachraeth. The work has shown that the provision of noise barriers at other locations along the A5025 would not provide value for money. Low noise road surfaces are most effective at higher speeds where tyre noise is dominant, but have a reduced effect at lower speeds when engine noise is more significant. Due to the limited opportunities to provide mitigation in the design of many highway schemes, it is common for offers of off-site noise mitigation (such as noise insulation) to be made in respect of highways improvement schemes. <u>Noise Insulation Thresholds</u> For highways schemes promoted by Welsh Government and Local Authorities, The Noise Insulation Regulations 1975 (as amended 1988) (NIR75) require the appropriate highway authority to carry out (or make a grant in respect of the cost of carrying out) insulation work when the scheme will lead to an increase in noise level of at least 1 dB(A), above a threshold of 68 dB $L_{A10,18\text{-hours}}$. This absolute threshold is selected as above this noise level broadly equates to an internal level of 35 dB $L_{Aeq,16\text{-hours}}$ with a closed single glazed window. Above this noise level it may be difficult for a resident to achieve reasonable internal noise levels for resting or concentrating by closing a window. This threshold (which equates to a facade level	

ExA Ref.	Question	Horizon's Response to Question	Comment
		of ~66 dB $L_{Aeq,16\text{-hours}}$) is therefore associated with the onset of unacceptable effects over which the resident cannot exert control, even for short periods of time. The 68 dB $L_{A10,18\text{-hour}}$ (66 dB $L_{Aeq,16\text{-hour}}$) threshold adopted by the NIR75 is consistent with the finding of a report [RD1] produced by the Organisation for Economic Cooperation and Development in 1986 into the effects of noise, which concludes: • below 55dB L_{Aeq} during the day at the facade damage [in terms of health and annoyance, rather than physically to the building facade] caused by noise is very slight. The acoustic conditions enable the most sensitive activities to be carried on normally; • between 55 and 60dB L_{Aeq} noise impact remains limited but some disturbance is probably occasioned to the more sensitive individuals, in particular older people; • between 60 and 65dB L_{Aeq} behaviour designed to reduce the annoyance is exhibited, although this is not too constraining. However, the effects on sleep and especially the level of annoyance increase very appreciably; • above 65dB L_{Aeq}, constrained behaviour patterns arise, symptomatic of serious damage caused by noise. In setting this threshold, the NIR75 seeks to protect residents from unacceptable effects, but is limited to only reducing indoor levels. The research underpinning the 68 dB $L_{A10,18\text{-hour}}$ threshold was undertaken independently of the OECD by BRE, who suggested that this level represented <i>a reasonable compromise between what is desired and what can be afforded</i>. Therefore, while cost is not considered when assessing eligibility for noise insulation under the NIR75, there is an implicit economic judgement in the threshold which has been adopted in the legislation. In respect of the noise assessment presented in the request for non-material change to HGV movements [REP4-013], the daytime criteria associated with the onset of potentially significant adverse effects is a short term increase of 1 dB where the resulting level exceeds an absolute threshold of 50 dB $L_{Aeq,16\text{-hours}}$. Whilst noise levels in the range 50 to 65 dB $L_{Aeq,16\text{-hours}}$ will lead to increasingly significant effects, as explained above when considering the 1986 OECD report [RD1], residents will still be able to achieve suitable internal environments for resting and concentrating by temporarily closing windows, and such behaviours are	

ExA Ref.	Question	Horizon's Response to Question	Comment
		unlikely to be too constraining. In comparison to the DCO application, there would be an additional 18 properties subject to significant adverse effects under the proposed changes to HGV movements [REP4-013]. The road traffic noise aspects of the Local Noise Mitigation Strategy (LNMS) are based on the NIR75, but which (as of the Deadline 5 update of the WN CoCP) have a threshold that is 5 dB lower at 63 dB $L_{A10,18\text{-hours}}$ (~61 dB $L_{Aeq,16\text{-hours}}$). This threshold is at the lower end of the range quoted by the OECD report [RD1] at which behaviour designed to reduce the annoyance is exhibited. This is considered appropriate due to the rural nature of the area, relatively quiet baseline environments, and Horizon's desire to be a good neighbour. Horizon has also proposed eligibility criteria in relation to night-time noise levels, although these are not relevant to the request for non-material change to HGV movements [REP4-013] as no night-time deliveries are proposed. However, reducing the threshold to a level that is commensurate with the onset of significant adverse effects would add significant cost, which in Horizon's judgement cannot be justified given that (a) residents will be able to close the windows for periods of respite, and (b) unlike noise from most highways improvement schemes, the noise due to construction traffic is temporary. In the case of residents living along the existing A5025 alignment in the villages to be bypassed, the effects of construction traffic will last only until the bypasses are completed, which will be before the peak year of construction. References [RD1] Organization for Economic Co-operation and Development, Fighting Noise: Strengthening Noise Abatement Policies. Paris, France: Organization for Economic Co- operation and Development, 1986.	

ExA Ref.	Question	Horizon's Response to Question	Comment
Q2.13.14	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?	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 nighttime? The night time period used in the World Health Organisation's Night Noise Guidelines for Europe is from 23:00 to 07:00. Within the guidelines, this is referred to as L_{night,outside}, which is the L_{night} noise indicator as defined in Directive 2002/49/EC of 25 June 2002. The definition provided within Directive 2002/49/EC is: The night-time noise indicator L_{night} is the A-weighted long-term average sound level as defined in ISO 1996-2: 1987, determined over all the night periods of a year; in which: • the night is eight hours as defined in paragraph 1, • a year is a relevant year as regards the emission of sound and an average year as regards the meteorological circumstances, as defined in paragraph 1, • the incident sound is considered, as laid down in paragraph 1, • the assessment point is the same as for L_{den}. The World Health Organisation's Night Noise Guidelines for Europe provide two recommended night noise guideline levels in the L_{Aeq} index. These are: • Night Noise Guideline (NNG): 40 dB L_{night,outside} • Interim Target (IT): 55 dB L_{night,outside} 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? The minimum absolute noise criteria applied in the ES for daytime was 50dB L_{Aeq,16hr}. Applying the World Health Organisation's Night Noise Guidelines for Europe Interim Target (IT) of 55 dB L_{night,outside} to the evening period would result in fewer properties experiencing a significant adverse effect. If the more stringent Night Noise Guideline (NNG) level of 40 dB L_{night,outside} is applied to the evening period, the number of properties experiencing a significant adverse effect would approximately double. However, it is noted that there is no Government, British Standards, or non-governmental organisation guidance on road traffic noise which suggests that the period 19.00-23.00 should be considered night-time.	IACC agree with this reasoning and the approach to the WHO Night Noise Guidelines assessments and conclusions.

ExA Ref.	Question	Horizon’s Response to Question
Q2.13.15	How should the proposed change be secured in the dDCO?	As noted in its request [REP4-011], Table 2-9 provides a schedule of consequential amendments to the DCO application that will need to be made if the change is accepted. These amendments (for example, to the shift patterns stated in the Wylfa Newydd CoCP) will secure the change within the DCO.
Q2.13.16	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	The assessment of the materiality of the proposed change is set out in the change request submitted at Deadline 4 [REP-013]. Horizon considers, following its extensive assessment, that the proposed change is non-material (both individually and cumulative with the other change requests).

ExA Ref.	Question	Horizon’s Response to Question
Q2.13.17	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 internal haul roads.	(1) During the construction of the earthworks, the haul roads will need to change location as the topography of the site changes. The hauls roads were initially positioned and plotted in the “worst case” scenario locations for noise and emission assessments modelling. ▪ With the proposed change, the timing and worst case scenario will change and so the site construction plan modelling has been updated and refined with new haul roads that accommodate the site construction sequencing. ▪ With the extension of working hours for key construction activities (such as earthworks, blasting and excavation), additional haul roads have been proposed to accommodate the additional movements and works throughout the site whilst also reducing the potential environmental effects on nearby receptors. ▪ As set out in paragraph 2.2.3 of the Request for Change [REP4-012], these haul routes have been designed to reduce plant movements near sensitive receptors and to facilitate the construction activities that would be being undertaken over longer periods of time. (2) The indicative haul routes used in the model are attached as Appendix X and described in paragraph 2.2.3 of the Request for Change [REP4-012]).

ExA Ref.	Question	Horizon’s Response to Question
Q2.13.18	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].	This is described in paragraphs 2.5.2 to 2.5.4 of the Request for Non-Material Change (RfNMC) no.4 Working Hours document [REP4-012]. In summary, the residual effects with regard to emissions from construction plant, machinery and marine vessels were not quantified within the Environmental Statement (see chapter D5 [APP-124]). Although additional mitigation to reduce and manage NOx emissions was proposed and secured in the Main Power Station Site sub-CoCP [APP-415], the proportion of newer, lower emitting plant had not yet been determined. After submission of the DCO application, this was subsequently specified as 90% of non- road mobile machinery to meet the EU Stage IV emission standards and was included in the updated Main Power Station Site sub-CoCP [REP2-032] submitted at Deadline 2. A commitment to reduce NOx emissions from marine vessels was also included in REP2-032. The effect of applying these mitigation measures was modelled and reported in the Air Quality Mitigation Quantification Report [REP3-052] submitted at Deadline 3. This report represents the latest quantified position with regard to the modelling of emissions from construction plant, machinery and marine vessels with all mitigation in place. If the proposed changes to working hours were compared to the model results set out in chapter D5 [APP-124] of the Environmental Statement, this would show only beneficial effects as the results in chapter D5 [APP-124] did not include the effect of applying the proposed additional mitigation. By comparing how the model predictions from the changes in working hours compare against the quantified residual effects from the Air Quality Mitigation Quantification Report [REP3-052], this enables an accurate representation of the adverse effects from the proposed changes to working hours.

ExA Ref.	Question	Horizon's Response to Question	Comment
Q2.13.19	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?	For the DCO application (the current application), major adverse significant effects are predicted at 321 dwellings. This comprises 310 properties at which a medium magnitude of change is predicted, and 11 properties at which a large magnitude of change is predicted. Under the proposed request for change to working hours, major adverse significant effects are predicted at 242 dwellings. This is 79 fewer than for the current application, which gives a 24.6% reduction (which is rounded to an integer value of 25% in [REP4-012]). It should be noted that the figure of 79 is the net difference in number of properties at which major adverse significant effects are predicted between the two scenarios. This number results from noise reductions at 100 properties (which move from a medium to small magnitude of change), and noise increases at 21 properties (which move from small to medium magnitude of change). The movements between magnitude of change categories, and net changes to totals in each band are set out in Table 2-16 of [REP4-012]. Table 2-17 provides an overview of where these changes in magnitude occur; in the case of the properties which would no longer experience major adverse significant effects due to the proposed change, the largest number (74 out of the 100 properties) are in Receptor Group B (Cemaes).	IACC cannot confirm whether Horizon's response is acceptable as IACC cannot replicate the modelling without costly and specialist environmental noise prediction software such as <i>CadnaA</i> (Computer Aided Noise Abatement) which it does not have.
Q2.13.20	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?	1) The worst-case construction noise levels at the Site Campus, which form the basis for the accommodation block noise mitigation has design, are not affected by the proposed change. The Cooling Water System outfall tunnel works, the seaward end of which occurs in construction zone 11 (shown on figure D6-2 [APP-237]) are closer, and result in higher noise levels at the Site Campus, than any of the other works within the Wylfa Newydd Development Area. These works will remain a 24-hour activity as identified and assessed in the DCO application. 2) Horizon's response to Q2.9.2 considers the prediction, assessment, and mitigation of construction noise impacts at the Site Campus in detail, but briefly the mitigation measures include: The proposed building materials and constructions, particularly the external facades, windows, and roofs which will be selected to ensure that internal noise levels meet	

ExA Ref.	Question	Horizon’s Response to Question
		those set out in the building design principles of the Design and Access Statement [REP4-018]. Initial calculations indicate that a minimum sound insulation performance of R_w 50 dB for external walls, and R_w (C;Ctr) 35 (-2;-5) dB for window units will be required on the most exposed facades of the accommodation blocks. • The building ventilation strategy, which for the accommodation blocks will be mechanical ventilation, with fan coil units in bedrooms supplied by air handling units located on rooftops or in plantrooms [REP4-018]. Therefore, unlike many off-site receptors occupants of the accommodation blocks will not be reliant on opening windows to achieve suitable internal air flow rates or summertime cooling. • The orientations and positions of the blocks within the Site Campus, which will be selected to minimise noise ingress and provide protected outdoor spaces; the accommodation blocks located near the perimeter of the Site Campus area will function as noise barriers for the blocks and amenity spaces located closer to the centre of the Site Campus and near the shoreline. • The sequence in which the blocks will be constructed will be influenced by the locations around site that construction works are being undertaken, so as to avoid impacts where possible. • Staff working night shifts will be located on the protected side of accommodation blocks or in blocks nearer the centre of the Site Campus which are protected from the highest daytime noise levels. In addition to the mitigation measures which will be included in the design of the Site Campus, the following mitigation measures will be implemented wherever necessary and practicable when undertaking the Cooling Water System outfall tunnel works: • acoustically dampening sheet steel piles (expected to give 5 to 10 dB(A) reduction in noise from this activity), • using super silenced dozers, excavators, and dump trucks (also expected to give 5 to 10 dB(A) reduction in noise compared to normal versions of this plant)

ExA Ref.	Question	Horizon's Response to Question	Comment
		- fitting suitably designed mufflers or sound reduction equipment on rock drills and tools (up to 15 dB(A) reduction compared to normal versions) - acoustic screens will be placed around static equipment and material drop zones (up to 15 dB(A) reduction)	
Q2.13.21	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.	Marine piling Sheet Piling in Main cofferdam complete – 19 NOV 2020 – Act W9C.425.114.1130 finish Sheet Pile removal in main cofferdam complete – 15 NOV 2021 – Act W9C.425.116.2250 (12 days after start) Sheet piling outfall cofferdam install complete – 14 MAR 2022 – Act W9C.425.114.0060 finish - MOLF construction 10 Jan 22 – Act W9C.425.116.2300 Finish Preparation for blasting including rock drilling and packing for blasting This doesn't make sense. They last prep and for blasting will be on the last day of blasting which is 06 NOV 21 – Act W9C.781.113.730 finish Drilling and rock anchoring in excavations including application of shotcrete to stabilise open faces 20 Nov 2021 – Act W9C.781.113.3770 Finish - Moving/repositioning won rock in the excavations both from the marine area (zone 10) 02 OCT 2021 (Act W9C.425.113.1100 finish) and from unit 1 (zone 4) 22 AUG 2021 (ACT W9C.781.113.1110 finish) and unit 2 (zone 8) 30 AUG 2021 (W9C.781.113.1180 finish). This material will move to areas around the deep excavation and for the construction of the MOLF. (NOTE: It appears the zones used in this bullet are from an old noise model and not from the construction planning. Therefore I am using the scope and not the zone to answer.) There are trenches to the north of the units that complete 14 OCT 2021 (W9C.781.113.1250 finish). The marine use of rock is pretty much complete at this point so spoil will be going to Mound A. - Support operations which covers a range of activities required to support the early	IACC's objection remains regardless of this one hour reduction on the basis that it conflicts with working hours recommended with BS5228-1:2009 and BS6472-2:2008.

ExA Ref.	Question	Horizon’s Response to Question					Comment
		works and Main Construction (e.g. equipment/road maintenance, fuelling, movement of equipment and materials, cleaning). This will not be complete until the last day of the project if it includes fuelling and maintenance of cranes. But if only earthworks is considered final landscaping is complete 15 MAR 2026 Act W9C.780.110.100 finish.					
		• Site grading in construction zones 6, 7, 8 and 9 and the transportation of resultant material on haul routes HR-011, HR-B1 and HR-B2 for the construction of Mound E and Mound B. The majority of this work would occur in months 1-12 of construction Again these zones don’t align to our construction plan but Mound B & E are done on 13 OCT 2020 Act W9C.780.112.2390 finish					
		The Table below presents indicative timescales:					
			Construction activities	DCO Working hours	Proposed change	Indicative Work Activity Period	
			Marine piling	All piling 07:00–18:00 hours	Percussion piling 07:00–19:00 hours. Sheet piling 24 hours	Sheet Piling to MOLF cofferdam area completed – Commencement of DCO Works to completion (+ 17 months) (to finish).	
						Sheet Pile removal from MOLF cofferdam – Commencement of DCO Works plus 30 months (start) for duration of (12 days) with completion at (+ 31 months).	

ExA Ref.	Question	Horizon's Response to Question				Comment
					Sheet piling outfall cofferdam install complete – Commencement of DCO Works to completion (+ 33 months) (finish)	
		MOLF construction	All relevant plant 07:00–18:00 hours, except marine plant (24 hours)	All plant, 24 hours.	MOLF construction Completion – Commencement of DCO Works to Completion (+ 31 months).	
		Preparation for blasting including rock drilling and packing for blasting	All plant 07:00–19:00 hours	24 hours, seven days per week construction operations for deep excavations.	Preparation for blasting activities completed - Commencement of DCO Works to completion (+ 29 months).	
		Drilling and rock anchoring in excavations including application of shotcrete to stabilise open faces	All plant 07:00–19:00 hours	24 hours, seven days per week construction operations for deep excavations.	Drilling and rock anchoring activities completed - Commencement of DCO Works to completion (+ 29 months).	

ExA Ref.	Question	Horizon's Response to Question				Comment
			Moving/repositioning won rock in the excavations both from the marine area (zone 10) and from unit 1 (zone 4) and unit 2 (zone 8). This material will move to areas around the deep excavation and for the construction of the MOLF.	All plant 07:00–19:00 hours	All of the plant identified in the schedule will be operating 07:00–19:00 hours, whilst only half the plant (50%) identified in the schedule will operate 19:00–23:00 hours and 23:00–07:00 hours. Material in zone 10 will be placed only as far as breakwater (24 hours)	Moving/repositioning of rock in excavations as follows: (1) Marine Work (Zone 10) - Commencement of DCO Works to completion (+28 months). (2) Deep Excavations (Zone 4 and Zone 8) – Commencement of DCO Works to completion(+25 months). (3) Trenches to north area of site - Commencement of DCO Works to completion (+27 months).
			Support operations which covers a range of activities required to support the early works and Main Construction	All plant 07:00–19:00 hours or 06:00–20:00	All plant 24-hour operation.	Support operations required to support the early works and Main Construction Preparation Commencement of DCO Works to completion (+ 75

ExA Ref.	Question	Horizon's Response to Question										Comment
			(e.g.	hours			months).					
			equipment/road									
			maintenance,									
			fuelling, movement									
			of equipment and									
			materials, cleaning).									
			Site grading in	All	plant	All	plant	Site	Grading	completed		
			construction zones	07:00–		07:00–22:00		construction zones 6, 7, 8				
			6, 7, 8 and 9 and the	19:00		hours.		and 9. Commencement of				
			transportation of	hours				DCO Works to completion				
			resultant material on					(+ 15 months).				
			haul routes HR-011,									
			HR-B1 and HR-B2									
			for the construction									
			of Mound E and									
			Mound B. The									
			majority of this work									
			would occur in									
			months 1-12 of									
			construction									

ExA Ref.	Question	Horizon's Response to Question
Q2.13.22	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.	The assessment of the materiality of the proposed change is set out in the change request submitted at Deadline 4 [REP-012]. Horizon considers, following its extensive assessment, that the proposed change is non-material (both individually and cumulative with the other change requests).
Q2.13.23	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?	A list has been provided within the change requests submitted at Deadline 4. For reference: • Table 2-9, Request for Non-material Change – Shift Patterns[REP4-011]; • Table 2-24, Request for Non-material Change – Working Hours [REP4-012]; and • Table 2-8, Request for Non-material Change – HGV Delivery Window [REP4-013].
Q2.14.1	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 Environmental Permitting (England and Wales) Regulations 2016?	Horizon apologises for the lack of clarity and can confirm that the Mitigation Route Map [REP2-038] should refer only to the Environmental Permitting (England and Wales) Regulations 2016. The route map will be updated to this effect and submitted at the appropriate examination deadline.

ExA Ref.	Question	Horizon’s Response to Question
Q2.14.2	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?	The Site Preparation and Clearance Works application (reference 38C310F/EIA/ECON) was withdrawn on 5th February 2019. IACC and the Welsh Government has been duly notified. The withdrawal of the planning application will have no implications in the context of the overall phasing or programming as all works that were being sought under the SPC Application were also included within the provisions of Work No.12 in Schedule 1 of the draft DCO. The withdrawal for the application does have implications for the drafting of article 5 and Schedule 4. In the Deadline 5 update of the draft DCO (Revision 4.0), Horizon has deleted Schedule 4 and amended both the definition of "SPC permission" and article 5 to refer to any future application that may be submitted by Horizon separately under the TCPA. This is to ensure that Horizon retains the option to resubmit a second application in future if required.
Q2.14.3	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?	The construction of the spent fuel storage facilities has been assessed in the Environmental Statement. ES Volume D - WNDA Development D1 - Proposed development [APP-120] notes that construction of the main fuel storage facility would commence approximately 10 years into the operational phase of the development. Therefore, it has been assessed as part of the operational phase. Further detail and cross-reference is provided below. ES Volume C2 – Traffic and Transport [APP-089] assessed a worst-case peak of 2033 and notes at 2.4.23 that this, “<i>would be the peak year for Power Station operation with construction of Radioactive Waste facilities. The assessment assumes two Scheduled Outages in that year, which is the maximum that would occur in any single year.</i>” Further details is also provided in Appendix A, section 7.6 of ES Volume C - Road traffic-related effects (project-wide) App C2-4 - DCO TA Appendix G - Strategic Traffic Model - Overview [APP-108]. This confirms the construction worker numbers of 76 throughout the build period of 2033- 2035 and the vehicle movements associated with this. No significant adverse effects are identified for Traffic and Transport in the peak operational year.

ExA Ref.	Question	Horizon’s Response to Question
		The traffic flows generated for the operational peak year of 2033 were also assessed in ES Volume C - Project-wide effects C4 - Air quality effects of traffic [APP-091], no potentially significant effects were identified. ES Volume C - Project-wide effects C5 - Noise and vibration effects of traffic [APP-092] also assessed this scenario, the summary of residual effects is provided in Table C5-49 which includes moderate and major adverse effects. The worker numbers associated with the construction of the facilities are significantly less than the maximum number of workers (9,000) assessed for peak construction in ES Volume C - Project-wide effects C1 - Socio-economics [APP-088]. This workforce would be significantly lower than the outage workforce of 1,000, required every 18 months for each reactor unit, that was assessed as not having a significant effect on employment on Anglesey (paragraph 1.5.123). In terms of accommodation, as described in paragraph 1.5.125, “sufficient headroom is considered to be available to accommodate outage workers, even within Anglesey’s August tourism peak.” No significant adverse effects are identified for C1 - Socio-economics [APP-088] in the during operation. As noted in the Main Site Power Station sub-CoCP (a revised version of which has been submitted at Deadline 5 (12 February 2019)) at submission of the application, the works for the construction of the spent fuel facilities will be managed in accordance with the relevant controls in the Main Site Power Station sub-CoCP. For example, this would include matters such as submission of an application for prior consent under Section 61 of the Control of Pollution Act 1974 would be required for the works, the aim of which would be to establish that the best practicable means have been employed to control noise emissions. Further reference to the assessment of effects related to the spent fuels facilities is provided on a topic by topic basis in Volume D of the ES. Given the controls afforded in the Main Power Station Site sub-CoCP and the nature and scale of the works, the impact and resultant effect is limited.

ExA Ref.	Question	Horizon’s Response to Question
Q2.14.4	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?	Horizon did consider the use of the Port of Holyhead, both during the early years of the construction programme, i.e. pre Marine off-Loading Facility (MOLF); and as an alternative to the MOLF. Horizon is willing to discuss the potential use of Holyhead port in the future to supplement the delivery strategy but at this stage has no commercial plans to use the Port. To mitigate the potential impact of HGV movements prior to the MOLF, Horizon has committed to restrictions on the movement of HGVs on the key route to site, the A5025. This mitigation is set out in The Wylfa Newydd Project Phasing Strategy, submitted at Deadline 4, 17th January 2019 (Ref 8.29) Table 2-1 of the Phasing Strategy sets out the trigger for each key mitigation measure. Where appropriate this Phasing Strategy contains Horizon's commitment to relevant pre- delivery restrictions prior to the delivery of certain key mitigation. One of these triggers is the MOLF. These commitments are made to minimise environmental effects until the key mitigation is delivered and to provide assurances as to the timely delivery of such key mitigation. Reasons for each mitigation can be found in the Mitigation Route Map [REP2-038] The onsite MOLF is designed to mitigate road traffic impacts, this mitigation could not be provided if Holyhead were used as this would involve more road movements on the A55 and A5025 to transfer goods from Holyhead port to the WNDA. Notwithstanding the mitigation/ pre MOLF delivery restrictions identified above, Horizon reviewed potential alternative methods of transporting construction materials (appendix 10-1 of the Integrated Traffic and Transport Strategy [APP-107]), including sea and rail via Holyhead, then by road to site. Pertinent extracts from the study include: • The MOLF is an essential part of the freight transport infrastructure to import major reactor components, classed as AILs. “Alternative routing for a large proportion of these components is not possible due to constraining factors on the road network which provides connections to port or rail terminal facilities” (paragraph 10-1.1.2). □ It is estimated that up to 800 AILs would arrive via the MOLF (section 7.6 of the Integrated Travel and Transport Strategy).

ExA Ref.	Question	Horizon’s Response to Question
		Transporting raw bulk materials by rail would require up to three trains per day during peak construction. A lack of existing rail infrastructure in the vicinity of Wylfa Newydd would also require onward transport to the WNDA via road (paragraph 10-1.1.8 of the Integrated Travel and Transport Strategy). Transporting bulk materials by road would add substantial volumes of lorries to the road network; it is estimated that around 238,000 HGV deliveries would be required over the duration of the project to deliver the equivalent of the materials that could be delivered to the MOLF, once the MOLF is complete (paragraph 10-1.1.9 of the Integrated Travel and Transport Strategy). Due to proposals by Network Rail to increase passenger services (trains per hour), night time deliveries would be relied upon, which could result in unacceptable noise levels for unloading and transporting of material (paragraph 10-1.1.15 of the Integrated Travel and Transport Strategy). In conclusion the use of the Port was considered inappropriate or unnecessary, even in the unlikely event that the MOLF is delayed, for the following reasons: In order to reduce the impacts of the Project and to provide for the efficient delivery of construction materials, the MOLF was included within the Wylfa Newydd DCO Project design. The key benefit of the MOLF is that it will mitigate road traffic impacts and reduce reliance on the road network (including delivery delays due to adverse weather or accidents). This mitigation could not be provided if Holyhead Port was used as this would involve more road movements on the A55 and A5025 to transfer goods from Holyhead port to the WNDA. The inclusion of the MOLF also means that the use of the Port is not necessary. Horizon can not use the port to bring in the largest Abnormal Indivisible Loads as they are too large to then transport from the port to the WNDA via the road network. Open market procurement requirements mean that Horizon (and indeed any developer) could not commit at the development stage of the project to utilising any port. Horizon will select partners/tier 1 contractors against the most economical advantageous submission.

ExA Ref.	Question	Horizon’s Response to Question
		In addition to the above Horizon, as part of its work to support suppliers maximising opportunities, has been undertaking discussions with the Port of Holyhead as in addition to the MOLF there will be a need for a civilian port to support the needs of the project. This will support the transfer of mobiles/bulk materials from sea vessels to barges. Please note similar discussion have taken place with other civil ports within the region and UK. This work will be sourced competitively in line with the commitments made within the SCAP.
Q2.14.5	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.	In pre-application consultation (PAC) stage 2, Horizon has identified the site at Madyn Farm as a potential site for temporary worker accommodation which could deliver 200 bed spaces (see the TWA site selection report [APP-439] para 2.3.4). Following the changes to the worker accommodation proposals by (PAC) stage 3, Madyn Farm was no longer part of the accommodation proposals due to g the changes to the workforce and approach to developing the Site Campus. Madyn Farm was therefore not further pursued by Horizon and does not form part of the DCO application.
Q2.14.6	Would the proposed Community Infrastructure Fund bridge gaps in the resourcing of public services (eg community policing) where further unanticipated impacts arise or would this be the subject of a separate contingency fund?	• The purpose of the proposed Community Fund is not to bridge public service funding gaps. As set out in Schedule 12 of draft DCO s106 (submitted at Deadline 5), the Community Fund is for “<i>the purpose of mitigating any intangible and residual impacts of the Wylfa Newydd DCO Project on the communities in the [KSA] through schemes, measures and projects which promote the economic, social or environment well-being of those communities and enhances their quality of life.</i>” • Furthermore, the Community Fund is proposed to be ‘ringfenced’ such that 50% is for applicants of eligible projects in Tregele and Cemaes; 25% for applicants of eligible projects on Anglesey; and 25% for applicants of eligible projects in the KSA. • Other proposed funds are focused on resourcing public services to mitigate for the impact from the Project. • Emergency Services Contributions (to Fire, Police, and Ambulance services) provided for in Schedule 9 of the draft DCO s106. • A proposed Health and Wellbeing contribution, at Schedule 8 of the draft DCO s106 agreement provides for the mitigation of impact on local health and dental services. • A proposed Education Contribution to the Council is set out at Schedule 6 of the draft DCO s106 agreement to avoid impacts arising from Workforce Children.

ExA Ref.	Question	Horizon’s Response to Question
		- Horizon considers that these mitigation funding proposals are robust and will mitigate the impact of the Wylfa Newydd DCO Project on these services, especially given the significant commitment by Horizon to on-site services. - There is no proposal for a generalised emergency services contingency fund, this is not supported by Horizon. In part this is because the key variable driving effects on the emergency services is the additional people on Anglesey there is a significant amount of proposed investment by Horizon in mitigation and management measures relating to the workforce and how the workforce interacts in the community. This includes in relation to use of roads where there are proposed limits and controls (e.g. HGV caps, traffic routes, modal share splits, transport and bus routes), and the investment in community integration of in-coming workers and their families (via Community Involvement Officers for instance).
Q2.14.8	Could/should the Trywydd Copr/Copper Trail revert back to its original route (ie away from the A5025) after the construction period?	The Trywydd Copr / Copper Trail (NCN Route 566) between Cemlyn Bay and Llanfechell is currently routed along Cemlyn Road via Tregele, a route that includes 20-30m of the A5025. Cemlyn Road will be permanently closed as a result of the Wylfa Newydd DCO Project as the footprint of the Power Station will be on top of it. On this basis, it would not be possible to re-open Cemlyn Road, and the Trywydd Copr / Copper Trail could not revert to its original route. As set out in the Environmental Statement at Chapter D2 – Alternatives and design evolution [APP-121], Horizon considered two options for the Trywydd Copr / Copper Trail diversion, one option continued to route cyclists via Tregele, the second involved a shorter section along the A5025 but went direct to Llanfechell. The preferred option is considered to be the best diversion in the circumstances as it involves the shortest length of route along the A5025 and is comparable in length to the original route. In order to avoid confusion for cyclists it was also considered preferable to only have a single diversion applicable during both construction and operation.

ExA Ref.	Question	Horizon's Response to Question
Q2.14.9	Should the General Glossary [APP-006] include a definition of 'power island'?	Horizon will update the glossary to upload a definition of 'power island'. The updated glossary will be submitted at Deadline 7.

ExA Ref.	Question	Horizon’s Response to Question
Q2.14.10	The ISHs in March will consider the proposed WNDA 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. The ExA propose to consider the WNDA 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. In considering these elements particular attention will be paid to issues in relation, but not limited, to the following effects individually and in combination: • Landscape and visual; • Historic environment; • Good design; • Lighting; • Noise and Vibration; • Air Quality and Dust; and • Waste management and radioactive waste management. A second ISH on ‘Other Sites’ will consider	Although Horizon has sought to resolve as many issues with stakeholders as possible, there still remains some areas where agreement may not be reached before the end of Examination. The list below represents Horizons understanding of the principal outstanding issues, recognising that some issues are agreed by some parties, but not by others. For a more complete position on agreed and disagreed matters with each party, please refer to the Statements of Common Ground being submitted at Deadline 4Horizon will continue to seek agreement on these outstanding matters. WNDA as a whole: • Phasing strategy – timing of the site campus not early enough • Mitigation proposed for Annex I habitat possibly not sufficient. • Effects of the project on bathing water quality at Cemaes • Re-routing of the Wales Coast Path • The need for a separate off-site planting fund • Biodiversity net gain across WNDA and preservation of protected species • Loss of foraging area for and disturbance to chough • Water quality impacts to Nant Cemlyn and Cemlyn lagoon from Mound E runoff • Mitigation of impacts (physical impact and site setting for registered park and garden) in relation to Cestyll Garden (inc. justification for loss of the Kitchen Garden). • Archaeological Strategy for WNDA • Value and significance level attributed to the Dame Sylvia Crowe Landscape • Re-routing of Wales Coast Path • Lighting Strategy – light pollution MOLF and Breakwater: • Design of the western breakwater (profile and height) – landscape & visual impact

ExA Ref.	Question	Horizon's Response to Question	Comment
	the same range of issues on a similar basis for: - 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. 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?	Site Campus/Temporary Workers Accommodation: - Impact of the Site Campus on Tre'r Gof SSSI Other Sites: - Requirement for Euro VI rated engines on buses and no lower (air quality) - Location and type of air quality monitoring at Associated Development Sites - Mapping and recording/referencing of all distinctive landscape elements and features across all sites - Operational lighting strategies for MEEG and P&R - Design issues at AD sites	
Q2.15.1	In relation to the Spent Fuel Storage Facility (Building no 9-201) and the Intermediate Level Waste Storage Facility (Building no 9-202) explain: 1) The phasing of construction in relation to the Main Power Station site construction programme and how the development site would be accessed and serviced? 2) The maximum potential length of time	1) The facilities will need to be operational 10 years post COD (Commercial Operational Date). Construction will commence up to 5 years before this date. Access will be via a temporary access from the southern carpark. 2) The Intermediate Level Waste Store would be required until after the end of decommissioning. The Spent Fuel Storage Facility would remain in service for up to 140 years after the end of generation. 3) Both buildings will be required after the station's operational phase. a) The maximum size the of buildings is described by work area 1D [APP-029] as shown in Work Plan WN0902-HZDCO-WPN-DRG-00003 [APP-011]	IACC provided some information in relation to this question with reference to information already submitted at Deadline 5 (IACC response to written questions REP5-057). HNP's response is in accordance with this and does not provide any additional information, other than a reference to the potential need for recladding and rebuilding (end of 5). A building that needs to last 140 years beyond generation (ie up to 190 years) would need regular maintenance that could include recladding but how practical it would be to rebuild a building housing spent nuclear fuel is not clear. HNP has avoided answering whether these buildings are of high enough quality, from an aesthetic perspective, in view of the long timescale for these buildings and their location close to Cestyll Garden.

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	these buildings would be required? 3) How, in the event of the two buildings being required beyond the operational and, potentially, decommissioning phases of the project, a. the size and boundaries of the site they would occupy; b. how they would be accessed, serviced and provided with car and cycle parking; and c. how they would appear in the landscape from a visual perspective – using illustrative plans if possible; 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? 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?	b) After Decommissioning the buildings would be accessed from the main site access road. Car and cycle parking could be included as part of the existing southern car park, modified southern car park or parking within work area 1D, these details have not been defined yet. c) The visual appearance of the building can be seen in drawing WN0902-HZDCO-MSB- DRG-00048, WN0902-HZDCO-MSB-DRG-00049, WN0902-HZDCO-MSB-DRG-00050 and WN0902-HZDCO-MSB-DRG-00051 [APP-014], their appearance within the landscape would be controlled by the design principles within the Design and Access Statement – Volume 2 – Power Station Site [APP-408] and the Landscape and Habitat Management Strategy (Part 1 of 2) [APP-424]. 4) The design of these buildings will meet the functional requirements for radioactive waste storage buildings, which includes consideration of building life and building maintenance. The design will be in accordance with the design principles. 5). Maximum design life would be ensured by undertaking a comprehensive inspection and maintenance regime. Plans and funding take into account the potential need for recladding and rebuilding.	

ExA Ref.	Question	Horizon’s Response to Question
Q2.15.2	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”. TAN12: Design (2016) sets out a series of ‘Design pointers’ including 10 bullet points for environmental sustainability. 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]. Explain in the light of these policy objectives and in relation to the following buildings: < 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.	Please see Horizon’s response to FWQ Q14.0.4. In addition Horizon provides the following response: The Sustainability Statement broadly assesses the sustainability performance of the Wylfa Newydd DCO Project. The Planning Statement [APP-406] summarise how Horizon has complied with the requirements of NPS EN-1. In addition to NPS EN-1 Horizon would highlight paragraph 2.8.1 of NPS EN-6 which confirms that the need to ensure the safety and security of a nuclear station and to control the impacts of its operation should be given substantial weight in determining whether or not the principles of ‘good design’ under NPS EN-1 have been achieved. Therefore, while good design including sustainability is an important principle for the development of the designs of the Power Station Site (and are secured through Requirements WN3 to 5), good design must be balanced against the functional, operational, safety and security needs of the power station. Section 5 of the Design and Access Statement: Volume 2 identifies which design principles satisfy the theme of sustainability in accordance with good design for energy infrastructure as set out in NPS EN-1 and NPS EN-6. As noted in response to Q14.0.2, EN-6 confirms that good design principles, including sustainability, must be balanced against the operational and security needs of the power station. Examples of design principles that promote sustainability include Principles 25 and 42 which require the footprint, scale and massing of buildings and structures on the Power Station Site and Marine Works will be as small as reasonably practicable, including temporary buildings and structures; and Principle 76 which promotes electric charging points. In accordance with Requirement WN3, the detailed designs for the Power Station on the WNDA must be in accordance with all of the design principles contained in Volume 2 of the Design and Access Statement. On this basis the draft DCO will secure the integration of sustainability into the physical design of all of the proposed WNDA development. In addition the sustainability and good design aspects including visual appearance, scale etc

ExA Ref.	Question	Horizon's Response to Question
	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 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?	of the Off-Site Power Station Facilities, Site Campus, Park and Ride facility at Dalar Hir and Logistics Centre at Parc Cybi are discussed and illustrated in Design and Access Statement - Volume 3 - Associated Developments and Off-Site Power Station Facilities [APP-409 and APP-410]. These documents include the design principles (for approval) which will deliver “good design”, which includes sustainable technology and material use.

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Q2.15.3	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 Would there be merit in establishing: 1) Design codes that build on the Design and Access Statement; and 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? If so how might these initiatives be secured through the dDCO?	1) The design of a nuclear facility is heavily constrained by the requirements of assuring nuclear safety, security and environmental protection. These constraints are codified in numerous relevant standards and legislation. Requirements to comply with design codes, UK legislation and the design principles within the Design and Access Statement form part of the technical requirements set in Horizon’s specification to the designer. All requirements are treated the same way and the designer must demonstrate that their design satisfies all requirements. Horizon does not consider that another set of "design codes" is necessary as design of the Project is already subject to detailed design constraints. 2) For any decision that may affect nuclear safety, security or has the potential to cause an environmental impact the duty-holder (that is, Horizon as the party responsible for the Power Station) must be the “controlling mind”. Whilst at first sight matters of sustainability and implementation of the DAS seem to fall outside of this, this is not the case as many of the structures in question must be designed to contain high hazard material under normal and fault conditions. For example the main structures need to be able to withstand very low probability events including earthquakes and malicious aircraft impact therefore decisions around coatings and coverings can impact nuclear safety as they can materially and sometimes unwittingly affect concrete integrity. Therefore, design of the Power Station must not prohibit the ability to obtain and comply with Environmental Permits and the Nuclear Site Licence. 3) Horizon demonstrates its compliance with nuclear site license by a robust set of management arrangements. These arrangements include a comprehensive design review procedure, which specify numerous internal design review panels, as well as independent reviews, such as those provided by the Nuclear Safety Committee. For these reasons, an additional Design Panel is not considered necessary.

ExA Ref.	Question	Horizon's Response to Question
Q2.16.1	1) How would the suspended state affect the delivery of the project? 2) If this would result in a delay to the delivery of 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]?	As the vast majority of the project development activities are currently suspended, the delivery of the Wylfa Newydd DCO Project will clearly be delayed by the entry into the suspended state. At this point Horizon cannot put a definite time on the delay but anticipate it being around 18 months to two years. As shown by actions such as the decision to continue with the DCO through to the end of the examination phase, Horizon are looking to take actions that will facilitate a timely restart should other crucial conditions be met, most pressingly around the need for a new funding and financing model. This delay does not detract from the important contribution that new nuclear, including Wylfa Newydd, can and will make to the UK's future low-carbon energy mix. Therefore the delay does not undermine Horizon's case for the Wylfa Newydd DCO Project as set out in the Planning Statement [APP-406]. As the Government made clear in its December 2017 Ministerial Statement announcing that it would bring forward a new NPS applicable to nuclear power plants deployed after 2025, EN-1 and EN-6 remain important and relevant matters which would carry significant weight in determining an application. The Ministerial Statement states: "Government is confident that both EN-1 and EN-6 incorporate information, assessments and statements which will continue to be important and relevant for projects which will deploy after 2025, including statements concerning the need for nuclear power – as well as environmental and other assessments that continue to be relevant for those projects. As such, in deciding whether or not to grant development consent to such a project, the Secretary of State would be required, under section 105(2)(c) of the Act, to have regard to the content of EN-1 and EN-6, unless they have been suspended or revoked. In respect of matters where there is no relevant change of circumstances it is likely that significant weight would be given to the policy in EN-1 and EN-6."

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Q2.17.1	Confirm the status of Wylfa Newydd Supplementary Planning Guidance, May 2018 and whether it is to be submitted into the Examination.	The Wylfa Newydd Supplementary Planning Guidance (SPG) was adopted by the IACC on 15 May 2018. 2 The Wylfa Newydd DCO Project as a whole is compliant with the NPS policy and any relevant national and local policy including the SPG as set out in Horizon’s Written Representation submitted at Deadline 2 [REP2-003] paragraphs 3.3.121 to 3.3.127.
Q2.17.2	Respond in general to J Chanay’s submission at D4 [REP4-035] and in particular: 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	1) The Written Ministerial Statement on 7 December 2017 makes it clear that the Government considers that nuclear power stations yet to apply for development consent and due for deployment beyond 2025 should be considered under section 105 of the Planning Act 2008 (Act), rather than section 104 - under which an application would have to be determined in accordance with any relevant NPS. Section 105 (2) of the Act provides that the Secretary of State (SoS) must have regard to (a) any local impact report (b) any matters prescribed in relation to development of the description to which the application relates and (c) other matters that the SoS thinks are both important and relevant to the SoS’s decision. The policies included in the Overarching NPS for Energy (EN-1) and Nuclear Power Generation (EN-6) are both important and relevant matters in the context of decisions under section 105 of the Act. There has been one case relating to decision making under section 105. In <i>R v (David Gate) v The Secretary of State for Transport</i> [2013] EWHC 2937 (Admin), Turner J dismissed an application for judicial review of the decision by the SoS on the Heysham to M6 Link Road DCO application. That application was made prior to the National Networks NPS. One of the grounds of challenge was that the SoS wrongly took into account various NPS which were said not to be material to the type of development under consideration. In that case the application related to a highway, and the NPSs considered by the Secretary of State were the NPS for ports and NPS EN-1 (Heysham is a port and the site of two nuclear power stations). Turner J dismissed this ground of challenge, finding at [56] that: <i>"It must follow, and common sense would in any event dictate, that the decision maker is not precluded from taking into account matters incorporated within national policy statements which are not directly applicable to the development so long as he considers that they are both important</i>

ExA Ref.	Question	Horizon’s Response to Question
	the status of the proposed interim nuclear active waste storage facilities.	<i>and relevant to his decision."</i> This case demonstrates that even an NPS dealing with a different type of development can be relevant and important matters. If something is relevant, the weight to attach to it is a matter of planning judgement for the Secretary of State. The DCO application for the Tidal Lagoon at Swansea Bay was also decided under section 105 of the Planning Act 2008. The energy NPSs were considered to be important and relevant in the Secretary of State's decision. At Paragraph 11 of the decision states "<i>...the Secretary of State considers that in absence of any adverse effects which are unacceptable in planning terms, making the Order would be consistent with energy National Policy Statements (NPS) EN-1 (Overarching NPS for Energy), EN-3 (Renewable Energy Infrastructure) and EN-5 (Electrical Networks Infrastructure) which set out a generic national need for development of new nationally significant electricity generating and network infrastructure."</i> In the present case, the Government has made clear its view in respect of the relevance of NPS EN-1 and NPS EN-6 through the Ministerial Statement: <i>“Government is confident that both EN-1 and EN-6 incorporate information, assessments and statements which will continue to be important and relevant for projects which will deploy after 2025 including statements concerning the need for nuclear power – as well as environmental and other assessments that continue to be relevant for those projects. As such, in deciding whether or not to grant development consent for such a project, the Secretary of State would be required, under 105(2)(c) of the Act, to have regard to the content of EN-1 and EN-6, unless they have been suspended or revoked. In respect of matters where there is no material change in circumstances it is likely that significant weight would be given to the policy in EN-1 and EN-6”.</i> Further, the UK Government is currently bringing forward a new NPS applicable to nuclear power plants deployed after 2025 and capable of deployment by the end of 2035 and has consulted on the process and criteria for this. The Government Response to the Consultation on Siting and Process published in July 2018 states that the UK Government proposes to carry forward the sites listed in EN-6 (including Wylfa) into the new NPS, subject to them meeting the updated siting criteria and updates of their environmental assessments. While

ExA Ref.	Question	Horizon’s Response to Question
		the Examining Authority and SoS cannot pre-empt the outcome, the process to date is a further demonstration of the Government's ongoing support for new nuclear. Overall, the Secretary of State is entitled to give substantial weight to EN-1 and EN-6 in its determination of the DCO application. Horizon considers that to do so is strongly supported by Government policy and also by a range of other evidence (including that cited in Horizon's response to J. Chanay [REP3-024]). 2) Meeting the Energy Challenge - A White Paper on Energy (2007) (the Energy White Paper 2007) stated that it was in the public interest to allow private sector investment in new nuclear power stations. This was followed by the announcement in Meeting the Energy Challenge - A White Paper on Nuclear Power in January 2008 (the White Paper on Nuclear Power 2008) that nuclear should have a role to play in the generation of electricity, alongside other low carbon technologies. The Energy White Paper 2007 outlined the Government’s intended actions to reduce regulatory and planning risks associated with investing in new nuclear power stations. It referred to the fundamental reforms promoted in the then Planning Bill of the planning system in relation to NSIPs. These included the proposals to establish the (then) Infrastructure Planning Commission to determine major infrastructure proposals within the context of the new NPSs. Along with the Energy White Paper 2007, the White Paper 2008 forms part of the policy background that informed the development of NPS EN-1 and NPS EN-6. The White Papers were not drafted with the intention of guiding decision making in the context of the Planning Act 2008. To the extent relevant to consideration of DCO applications for Energy NSIPs, this has been incorporated into NPS EN-1 and NPS EN-6. For this reason, Horizon does not consider there is any specific reason for considering the White Papers further in the context of the DCO application.

ExA Ref.	Question	Horizon’s Response to Question
		3) With regard to the additional evidence on the need for Wylfa Newydd beyond 2025 (section 4.4) Horizon do not believe that anything in J. Chanay's submission detracts from the validity or clear consensus of the reports cited. Whether the respondent personally agrees with the conclusions of the reports or can point to reports which reach different conclusions doesn't alter the fact that the reports cited, from a range of independent and varied bodies, all point to a key role for nuclear in a future low carbon energy mix, in the UK and globally. The reports come from independent energy experts, world-leading energy academics, the global scientific body on climate change, and the UK's own electricity system and transmission operator. Each of them, having assessed the requirements for either general global energy systems or the UK's system specifically under a vast range of scenarios, finds a need for nuclear to play a key role as we look to move to a decarbonised electricity sector, as well the decarbonisation of the heat and transport sectors. Given the Wylfa Newydd Power Station would add nearly 3GW of clean, secure nuclear capacity for the next 60 to 80 years, and thus make a significant contribution to increasing the UK and the world's overall supply of decarbonised electricity, clearly shows the relevance of these studies when considering the specific need or case for the Wylfa Newydd DCO Project beyond 2025. The fact that none of them looks specifically at the need for Wylfa Newydd is wholly irrelevant; they each show the need for the addition of new nuclear capacity into national and international electricity systems, which Wylfa Newydd would clearly contribute towards. On the specific issue of the cost of new nuclear, which J. Chanay mentions several times within section 4.4, this is clearly a crucial factor that needs to be considered and addressed as part of the overall project outside of the DCO process, but is not relevant to the question of the need for new nuclear within the UK's future energy system or to meet the country's security of supply and decarbonisation requirements. The cost of the Wylfa Newydd project, and ensuring it was delivered at a competitive price, is a key focus for both Horizon and the UK Government. The UK Government has made clear that in order for Wylfa Newydd to progress it would need to show that it could be achieved at a fair and reasonable price, something that would be ensured by various Value for Money assurance processes, including the Cost Discovery & Verification process as part of the agreement for a Contract

ExA Ref.	Question	Horizon’s Response to Question
		for Difference between Horizon and the UK Government. 4) In respect of comments at 4.7.1, Horizon's earlier response [REP3-024] very clearly directs J. Chanay to the relevant part of the application that addresses his queries regarding Horizon's assessment of the socio-economic effects of wages for operational workers. While Horizon acknowledges J. Chanay's frustration, as noted in its Deadline 4 cover letter [REP4-001] the incorrect reference was due to the referencing within the Examination Library changing from REP2-002 to REP2-375 following Deadline 3 submissions. As this change came after Horizon's Deadline 3 submission, Horizon's documents were unable to reflect this change. In response to paragraph 4.7.2.2, as noted in response to FWQ4.0.56 [REP2-375], the use of tailpieces within DCOs has been accepted by both the Courts and the Secretary of State as an acceptable way to ensure some flexibility for an NSIP, provided there are sufficient limitations. Horizon has provided such limitation in Schedule 3(1)(4) which follows PINS' guidance, precedent DCOs and case law. Horizon has included the tailpiece provision in the requirements that relate to: • control documents (Phasing Strategy); • documents that will be approved by the discharging authority following grant of the DCO (i.e. landscape and habitat management schemes); and • other construction and operational restrictions (such as parking). Horizon has included tailpiece provisions within these requirements because the DCO application has been advanced on a parameters approach where the detailed design will be refined at a later date. For this reason, it is extremely likely that there may be minor changes that are required once the detailed design is known but these changes cannot be accommodated within the existing control documents or requirements.

ExA Ref.	Question	Horizon’s Response to Question
		For example, as part of the design finalisation, Horizon may identify additional construction measures that are necessary to facilitate construction of the design (or its effects) but have not been identified within the Wylfa Newydd CoCP. Provided these measures are within the scope of the Environmental Statement (ES), the tailpiece would enable Horizon to amend the CoCP to include this measure during the construction of the Project. Similarly, circumstances may change during the construction or operation of the project which may mean that measures in a control document (i.e. a management scheme) are no longer as effective and amendments are required to ensure ongoing protection. The tailpiece provisions are therefore extremely important in ensuring that minor changes can be obtained without Horizon having to seek multiple change requests under the Planning Act 2008, which would result in significant delays and costs to the Project. In terms of J. Chanay's comments at 4.7.2.2.b, whether a tailpiece amendment is within the scope of the ES is a matter that would be determined by the discharging authority, as part of its planning judgement, at the time that the application is made. It is not something that needs to be assessed in order for the tailpiece to be included within the DCO. Therefore it is impossible to answer J. Chanay's request at 2.2.2.4(c) and (d) of REP2-305 without knowing what the proposed changes could comprise. 5) In response to paragraphs 4.8.1 to 4.8.1.2, following the positions expressed by IACC and WG at the January issue specific hearings the revised draft s.106 has restructured the governance proposals to remove the Wylfa Newydd Major Permissions Oversight Panel ("WNMPOP"). Please also see Horizon's response to SWQ 2.4.20. Further detail on the revised governance proposals are set out in the document submitted by Horizon at deadline 5 called "SWQ 2.4.1 and overview of amendments made to the draft revised draft s.106 agreement of 23 January 2019". In response to paragraph 4.8.1.3, Horizon is liaising closely with IACC as the local planning authority with whom the s.106 agreement will be entered into, which will secure the mitigation for the community. Other stakeholders who will be responsible for directly delivering

ExA Ref.	Question	Horizon's Response to Question
		mitigation (such as the health services) are also being directly liaised with. In addition, s.106 mitigation is a key component with statement of common ground discussions with a multitude of entities including community entities including community councils. A publicly available draft of the s.106 agreement was provided to the ExA at deadline 3 along with a status note. Moving forward, the current ExA timetable requests: • A track change version of the s.106 agreement to be provided at deadline 5 (12 February 2019) (SWQ 2.4.1.); • An updated version of the s.106 at deadline 6 (19 February 2019); • A final version of the s.106 to be provided at deadline 7 (14 March 2019); and • A signed version of the s.106 to be provided at deadline 8 (25 March 2019). Further copies of the agreement will therefore be provided at deadlines 6 and 7, and will be publicly available on the Wylfa Newydd website (at: https://infrastructure.planninginspectorate.gov.uk/projects/wales/wylfa-newydd-nuclear-power-station/) with other examination documents. In addition to the written deadlines above, there is a public hearing on the s.106 agreement scheduled for Wednesday 6th March 2019. Given the recent decision of the Welsh Government to call in the SPC planning permission, Horizon notified IACC that it wished to withdraw its application. Therefore, Mr Chanay's comments at paragraphs 4.8.1.4 to 4.8.1.5, are no longer an issue as Horizon is now only seeking consent for the site preparation and clearance works through the dDCO. Horizon has, however, retained article 5 to provide for the situation in future that Horizon may wish to seek planning permission separately from IACC under the TCPA. In response to paragraph 4.8.1.6, the s.106 agreement does provide for IACC funding for a FTE Environment Officer whose role will include monitoring the Developer's and its partners' and contractors' compliance with relevant ecological mitigation and monitoring plans committed to by the Developer pursuant to the DCO and to work with the Developer's Ecological Clerk of Works. As part of the s.106 agreement, the Council will have monitoring and reporting obligations on

ExA Ref.	Question	Horizon’s Response to Question
		it. Current proposals for that reporting include annual reporting on expenditure of monies received under the s.106 agreement and the key mitigation delivered or forthcoming. However, the environmental and ecological monitoring proposals are established in the Wylfa Newydd Code of Construction Practice and sub-CoCPs rather than under the s.106 agreement. Please see the Communications and community/stakeholder liaison management strategy set out in Section 3 of the Wylfa Newydd CoCP (submitted at Deadline 5 (12 February 2019)). Specific monitoring obligations are detail throughout the CoCP and sub-CoCPs. 6) As set out in Horizon's response to Q20.0.2 of the Examining Authority's First Written Questions [REP2-375]. The spent fuel storage facility and the intermediate level waste storage facility are essential aspects of the Wylfa Newydd Power Station and are therefore part of the NSIP. Neither structure requires a separate designation as a NSIP under section 14 of the Planning Act. Even if this was not the case, these facilities would be associated development. In accordance with paragraph 5 of the Department for Communities and Local Government, Planning Act 2008: Guidance on associated development applications for major infrastructure projects, cited by J. Chanay, the spent fuel storage facility and the intermediate level waste storage facility clearly have 'a direct relationship [with] the principal development', 'support the... operation of the principal development, or help address its impacts', are not 'an aim in itself but [are] subordinate to the principal development', are not 'only necessary as a source of additional revenue for the applicant, in order to cross-subsidise the cost of the principal development' and 'are proportionate to the nature and scale of the principal development'. Following the enactment of the Wales Act 2017, section 43 of the Wales Act 2017 inserted a new sub-section (4A) into section 115 of the 2008 Act which states that development consent may be granted for development that is associated with the construction of a generating station "that is (when constructed...)...expected to be within section 15(3A)" of the 2008 Act. Section 15(3A), which will come fully into force on 1 April 2019, provides that Welsh generating stations (excluding wind) that are more than 350MW will require development consent under the 2008 Act. Although section 15(3A) is not fully in force, it is currently in

ExA Ref.	Question	Horizon's Response to Question	Comment
		force for the purposes of enabling associated development to be included within a Welsh DCO under section 115 of the 2008 Act. As the Power Station, once constructed, is expected to be more than 350MW, associated development can be sought as part of the DCO application.	
Q2.18.1	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?	Sustainable waste management practices are integral to Horizon's waste and materials management strategy which includes site waste management, therefore no amendments are necessary. Horizon's approach to waste and materials management is secured by section 9.3 of the Wylfa Newydd Code of Construction Practice (CoCP) [REP2-414], the various site-specific sub-CoCPs and the WNCOP. Horizon will be required to comply with these measures through a DCO Requirement. The Horizon Waste Hierarchy, as set out in the WN CoCP, the sub-CoCP and the WN CoOP, is the core framework for implementation of sustainable waste management practices. It requires moving waste management practices as far up the hierarchy as practicable, therefore minimising disposal and maximising reuse, recycling and recovery. This approach will look to manage waste appropriately and sustainably, will mitigate adverse effects on the capacity of existing waste management infrastructure and ensure adequate steps are taken to minimise the volume of waste arisings and that which is sent for disposal. This approach will be implemented in line with all statutory obligations as it relates to waste and materials management, industry code of practice (CL:AIRE Code of Practice). Horizon's Waste Hierarchy is informed by and is in accordance with the relevant policy framework that aims to ensure sustainable waste management, including NPS-EN1, the overarching waste strategy document for Wales <i>Towards Zero Waste</i> and its associated Construction and Demolition Sector Plan. To further encourage sustainability and sustainable development outcomes, Horizon's approach to sustainable waste management will involve supply chain activities with a focus on the potential opportunities for local and regional waste management facilities and services to provide more sustainable outlets for the Wylfa Newydd DCO Project. Further information on this is found at Section 11 of Horizon's Response to Local Impact Report IACC [REP3-004] and Section 6.1 of Horizon's Response to Written Representations NRW [REP3-034].	IACC remains concerned that the SWMP and the WMMS appear to be internal-facing Horizon documents. The CoCPs do not place any obligation upon Horizon to share either the strategies nor the information collected and reported within them to IACC or NRW. Neither IACC nor NRW would therefore have any ability to review the success or otherwise of the sustainable waste management practices proposed to be employed by Horizon nor would they be able to enforce against any unsustainable practices. IACC therefore requires the CoCPs to be amended such that the SWMPs and WMMS must be submitted to and approved by IACC, in consultation with NRW prior to commencement of development with regular progress reports submitted during the construction process. IACC also considers that the SWMP and WMMS provide an opportunity to set out some clear actions, which would re-enforce statements made in the CoCP. For example, the revised CoCP states that "Horizon will liaise with local waste management contractors to ensure undue constraints are not placed on the waste capacity of the area". However, in practice, what will this mean? Should such liaison demonstrate that undue pressure is being put upon local waste management infrastructure, what measures will Horizon employ to ensure that sustainable waste management practices are implemented, or would Horizon simply export any 'surplus' waste outside the North Wales region? For the SWMP and the WMMS to be effective mechanisms for the implementation of sustainable waste management practices, it is considered that this level of detail is required.

Appendix 1 IACC WLCMES Outline Monitoring and Evaluation Plan in relation to Q 2.10.38)

Measure No.	Description of Proposed Enhancement Measure	Indicator to be Monitored and Timing	Timing of Evaluation	By Whom	Secured/Funded by:
Workforce					
1	Appointment of Welsh Language and Culture Co-ordinator (WLCC)	Progress Against JD (quarterly)	Performance Review (annual)	Horizon (Senior Management Group)	Horizon
2	Welsh language Skills Strategy Welsh language skills competency and assessment	% of workforce proficient to ALTE Level 1 , 2, 3, 4, 5 (quarterly)	Strategy Review (Annual)	Horizon • WLCC • HR Team • Senior Management Group Engagement Group Welsh Language Commissioner	Horizon
3	Interview Panels	% of interviews conducted in Welsh % of Wylfa Site Office that is bilingual (English and Welsh) (quarterly)	Strategy Review (Annual)	Horizon • WLCC • HR Team • Senior Management Group Engagement Group	Horizon
4	Career Route Maps	% take up of jobs by KSA population aged 24 and under) % applicants bilingual %Welsh speakers to Student Sponsorship Programme/ highly specialised posts	Strategy Review (Annual)	Horizon • WLCC • HR Team • Senior Management Group Engagement Group	Horizon
5	Recruitment Strategy	% jobs taken up by ALTE Level 3 and above Welsh speakers % Senior/Middle Management taken up by ALTE Level 3 and above Welsh speakers % jobs taken up by population residing in KSA (Quarterly)	Strategy Review (Annual)	Horizon • WLCC • HR Team • Senior Management Group Engagement Group	Horizon
6	Welsh Language Policy		Review (Annual)	Horizon • WLCC • HR Team • Senior Management Group Engagement Group	Horizon
7	Signage	% permanent public signs bilingual % temporary public sign bilingual % signs in other languages	Review (Annual)	Horizon • WLCC • HR Team • Senior Management Group Engagement Group	Horizon
8	Welsh Language Skills Competency Framework and Assessment Toolkit	Part of Welsh Language Skills Strategy (see Measure 2 above)	Part of Welsh Language Skills Strategy (see Measure 2 above)	Part of Welsh Language Skills Strategy (see Measure 2 above)	Horizon
9	Information to Contractors and Third Parties	% material containing reference to value of Welsh language skills % jobs of Contractors and Third Parties taken up by ALTE Level 3 and above Welsh speakers (Quarterly)	Review (Annual)	Horizon • WLCC • HR Team • Senior Management Group Engagement Group	Horizon
10	Contractors and Third Parties - Welsh language information requirements	% of Contracts and Procurement including specification for bilingual staff (Quarterly)	Review (Annual)	Horizon • WLCC • HR Team • Senior Management Group Engagement Group	Horizon

11	Contractors – use of local Suppliers -	% of contracts taken up by local suppliers (Six Monthly)	Review (Annual)	Horizon • WLCC • HR Team • Senior Management Group Engagement Group	Horizon
12	Contractors and Third Parties – Language and Culture Awareness Training	Part of Welsh Language Skills Strategy (Quarterly)	Review (Annual)	Horizon • WLCC • HR Team • Senior Management Group Engagement Group	Horizon
13	Data Collection on Dependents	% partners moving from without the KSA % of number and age of children moving from without the KSA Quarterly	Review (Annual)	Horizon • WLCC • HR Team • Senior Management Group Engagement Group	Horizon
Children, young people and families					
14	Bilingual Educational Support for pupils and students	% education materials supplied bilingually (six monthly)	Review (Annual)	Horizon • WLCC • Senior Management Group Engagement Group	Horizon
15	Support to Young People	% apprentices recruited that are bilingual % STEM materials in Welsh or bilingual (six monthly)	Review (Annual)	Horizon • WLCC • HR Team • Senior Management Group Engagement Group	Horizon
16	Immersion Education Capacity	% of children achieving proficiency (IACC Education department to define proficiency level) following immersion education (Six Monthly)	Review (Annual)	Horizon • WLCC • Senior Management Group Engagement Group IACC Cyngor Gwynedd Council	Horizon
17	Welcome Packs	% in-coming families awareness and understanding of Welcome Packs and contents (Quarterly)	Review (Annual)	Horizon • WLCC • Senior Management Group Engagement Group IACC Cyngor Gwynedd Council	Horizon
18	Community Language Services	No. of individuals trained to be Community Leaders Development of Micro Level Language Planning Toolkit (Local Action) % take up of language awareness and learning training courses for incomers and their families (Quarterly) % spouse/partners of incoming Construction/Operation staff that learn Welsh Employment of: Borum Bro Project Officer Programme Director 5 Community Involvement Officers (Commencement Year)		Horizon • WLCC • Senior Management Group Engagement Group IACC Cyngor Gwynedd Council	Horizon
19	Pre-School age children	Development of Pre-School age Plan (Commencement Year) % of incoming families with pre-school children % attending local Welsh medium provision	Review (Annual)	Horizon • WLCC • Senior Management Group Engagement Group IACC	Horizon

		(Quarterly)		Cyngor Gwynedd Council	
20	Community Translation Service	Development of baseline (Commencement Year) % take up of CTS % public meetings conducted bilingually (Six Monthly)	Review (Annual)	Horizon • WLCC • Senior Management Group Engagement Group IACC Cyngor Gwynedd Council	Horizon
Accountability					
21	Senior Management Group (SMG)	Establish SMG in Commencement Year	Effectiveness Review (Three Years)	Horizon • Board of Directors • Chief Executive IACC	Horizon
22	External Stakeholder Group (ESG)	Establish ESG in Commencement Year	Effectiveness Review (Three Years)	Horizon • Senior Management Group IACC	Horizon
23	Project Impact Evaluation	Annual Monitoring Report	Independent Evaluation every year during Construction Period and first 10 years of Operation period Five Year Independent Evaluation during remainder Operation and Decommissioning phases	IACC Horizon • Senior Management Group Engagement Group	Horizon
24	WLCMES Implementation	Annual Monitoring Report (to include Operation and Decommissioning Phases)	Independent Evaluation every year during Construction Period and first 10 years of Operation period Five Year Independent Evaluation during remainder of Operation and Decommissioning phases	Horizon • Senior Management Group IACC	Horizon
Wider Mitigation and Enhancement Measures					
WLCMES para. 4.6	Workforce Accommodation Strategy Health Impact assessment Report Jobs and Skills Strategy Cultural Heritage (WNTA)	Monitor impact of these mitigation and enhancement strategies for impact on Welsh language and culture	Part of Scope of Independent Evaluation under Measures 23 and 24	IACC Horizon • Senior Management Group Engagement Group	Horizon

APPENDIX B

IACC Responses to Actions set in Issue Specific Hearing on 7 January 2019

Appendix 1.1 Safeguarding

Page & Paragraph No.	HNP Statement	IACC Comment
1.1.2	Safeguarding would be covered by the CSMS	IACC were not invited to the meeting that Horizon had with Welsh Government and North Wales Police to discuss Safeguarding; the meeting does not therefore respond to the concerns about safeguarding outlined by the IACC in its LIR. Whilst Safeguarding and Community Safety are related they are not one and the same. Community Safety duties derive from the Crime and Disorder Act 1998, which places a duty on the police and local authorities to ensure local agencies work together to protect local communities from crime and help people feel safer. This includes considering how best to deal with local issues, such as anti-social behaviour, hate crime, substance misuse, and working collaboratively to formulate and implement local crime reduction strategies. Safeguarding derives mainly from the Children's Act 1989, Social Services And Wellbeing Act (Wales) 2014 and relates to the protection (and prevention of) of individuals who are unable to protect themselves. Contributory factors may involve some Community safety matters but is not limited to this. Therefore safeguarding is a broader concept and this needs to be recognised – by a specific Safeguarding Strategy which recognises the concerns and mitigation raised by the Local Authority in its LIR and in numerous submission during the process.
1.2.1	Well behaved and law abiding	Refer to the exact working of the LIR <i>It is important to acknowledge that the vast majority of the Wylfa Newydd Project workforce will present no threat whatsoever to the local population. However, inevitably, with a workforce and that size there will be contained within it an element that present some risk to those on the island who are already at risk. The presence of that workforce may also attract elements that are more of a risk to the local population</i>
1.2.2	In its response to the IACC LIR Horizon (at REP3-004, ch 6) notes that it does not accept the IACC	The Local Authority has challenged in some detail, Horizon's response and the measures it sets out. The statement in 1.2. 2 does not take us any further in resolving the matters of disagreement. It should also be noted that we

	analysis. Horizon's response sets out measures that it will take	have proactively requested a meeting with Horizon following the DCO hearing to attempt to take these forward.
1.2.3	• It has Controls in place to ensure safeguarding • it is in the process of agreeing financial settlements via the s.106 agreement with public sector bodies, as well as funding IACC officers in topic areas which are related to safeguarding.	IACC has not had the assurances that it has requested during numerous meetings over the past three years that Horizon has put adequate "controls" in place; IACC's concerns are clearly outlined in the LIR IACC has not received any details of Horizon's intention to "fund IACC officers in topic areas which are related to safeguarding". Safeguarding is a significant issue in its own right, and cannot be combined, and should not be confused, with other topic areas
1.2.6	Horizon will also take reasonable steps to safeguard the welfare of its employees and those acting on behalf of the company and its supply chain. Where it is appropriate Horizon will take reasonable steps to safeguard the welfare of the general public, such as the steps described in this paragraph. Prior to, and throughout the construction of the Wylfa Newydd Power Station appropriate dialogue will be maintained between Horizon, the contractor, the supply chain and local safeguarding agencies, including North Wales Police. Discussions will	Refer to previous submissions on the need for more robust response from Horizon. The proposed steps do not meet in any really sense, the mitigation suggested by IACC There is a lack of detail that is concerning - Reasonable steps? - Discussions? There is a need for determined and targeted action in response to the mitigation required by IACC in its LIR - Appropriate? – all staff should be trained Discussions about arrangements to safeguarding individuals at risk need to involve IACC, since North Wales Police are not the only agency with statutory responsibilities in this area.

	include any individual or coordinated measures appropriate to avoiding risks to vulnerable groups, for example in relation to human trafficking and direct or indirect sex work. Safeguarding protocols will be prepared by Horizon in consultation with North Wales Police, and IACC, and reviewed annually. An appropriate number of Horizon and supply chain staff will be trained in safeguarding issues so that, for example, security staff who conduct site and/or vehicle inspections will be aware of signs of illegal activity such as human trafficking.	
1.2.7	Horizon is preparing a CSMS	We have not seen this and cannot comment See also the comment in 1.1.2
1.2.7	Workforce Management Strategy (WMS) (APP413) and the principles which it outlines in respect to the development of a Code of Conduct (REP2-031).	Refer to previous submissions which indicated IACC concerns about the robustness of the strategy and the code of conduct.
1.2.7	Separate to BPSS checks, Horizon staff who will work with children, such as STEM ambassadors, or with vulnerable adults will receive an enhanced DBS check. This will be co-ordinated through Human Resources.	Safe recruitment requires more than this. For example:- - References – verified and checked - Career history – all gaps checked - Any previous employment with children and or adults who may be at risk – checked and verified.

1.2.7	Horizon's Modern Slavery Act Statement (2018)	See previous submission Should be signing up to the WG Code on Ethical Employment in the Supply Chain
1.2.7	Vulnerable The topics will be expected to include safeguarding	The term "adult at risk" is used in Wales The terms "will be expected to include" are too vague; if the Health and Well-being Engagement Group is to undertake this role, the IACC need an assurance that it WILL include safeguarding as a topic, and that the IACC's Director of Social Services will be asked to identify suitable Council officials to attend
1.2.8	Horizon will also put in place measures that indirectly contribute to safeguarding by improving relations with the local community and reducing the potential for adverse effects on community cohesion:	This is vague and provides no detail. Does not respond to the concerns and the mitigation identified by IACC
1.2.9 and 1.2.11 bullet 5	Community Involvement Officers both appointed by Horizon and IACC (funded by Horizon) will be a key interface between the local community, key stakeholders and Horizon management.	Community Involvement Officers are unlikely to have the expertise required to identify and advise on Safeguarding issues. IACC have outlined the resource needed to mitigate the impact of the development on safeguarding the local population in the LIR, which includes qualified and experienced Social Workers. Community Involvement Officers will be expected to only flag issues should matters be brought to their attention but will not have the capability and experience to address and deal with any Safeguarding issues.
1.2.10	Horizon has had a number of positive meetings with IACC on agreeing the s.106 agreement, and continues to engage including via statements of common ground meetings with other stakeholders.	A number of meetings between Horizon and a number of partners (including IACC) have been held since early 2016; in all of these meetings Horizon have rejected the concerns about Safeguarding that have been outlined by IACC and other partners.
1.2.11	The revised draft s106 agreement	IACC does not agree with this statement.

1.2.12	Horizon remains of the view that safeguarding is appropriately managed and funded and that no separate additional funding is required.	From the IACC's perspective, additional funding and resources will be required and discussions are ongoing on the s.106 agreement.
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Appendix 1.2 Langley Park

IACC has been asked to comment on the relevance of the Langley Park case to the Wylfa Newydd determination¹.

The *Langley Park* case provides that if harm from development is such as is contemplated by the development plan, there does not need to be exceptional circumstances to warrant consideration of lesser impacts arising from an alternative design as a material consideration in the planning process, whether that alternative is within the development site, or outside of it.

IACC notes that two potential “alternatives” are potentially in issue here: The first is IACC’s case that alterations to the design of the Wylfa Newydd development temporary worker accommodation (TWA), particularly in relation to height and layout can be achieved on site that would reduce harmful effects from that aspect of the development (the **IACC Proposal**).

The second is the case advanced by Land and Lakes that its development site at Cae Glas, Kingsland and Penrhos be used as an alternative site for provision of part of the Wylfa Newydd TWA (the **Land and Lakes Proposal**).

Any alternative design or reduction of TWA on the main Wylfa Newydd campus would not involve development or consideration of a new site, but a variant on using the same site.

It does not appear to the case that any party, including Land and Lakes, is arguing that The Examining Authority must consider alternative sites to the Wylfa Newydd campus in the way that is provided for in the *Trusthouse Forte* case, cited in *Langley Park*. Such an argument would very likely offend against the principles established in favour of the development site in NPS 6.

There are, however, questions for the Examining Authority that arise from the consideration of alternatives that are drawn from case law principles not found in *Langley Park*. These are:

- The adequacy of assessment of the impacts of any alternative development,
- the adequacy of consultation upon those alternatives, and
- the effect of any alternative not being part of HNP’s application.

IACC’s position drawing on the above points is that:

¹ ExA Hearing Action Points 7 January - *Provide comments in response to the Langley Park School for Girls V Bromley LBC, Court of Appeal (Civil Division) 31 July 2009.*

- There is no obligation on HNP to offer or assess alternative sites to those it proposes in its application, including the main campus.
- Equally there is no requirement on the Examining Authority to consider alternative sites to those proposed in the application.

In respect of the IACC Proposal

- It is open to the Examining Authority to consider ways in which adverse impacts of a type that would be recognised by the JLDP could be reduced by the use of alternative design proposals within the application site.
- The Examining Authority can modify the design of the TWA by imposition of a suitably worded Requirement, provided the impacts of doing so are less than those assessed in the EIA.
- As the IACC proposal has arisen from the DCO Consultation process itself, there can be no criticism that there has been inadequate consultation on the change. Those who have been involved in the examination process will be aware of the case being advanced by IACC on this point.
- No question of land outside of the Applicant's control or not forming part of its DCO application arises.

In respect of the Land and Lakes Proposal

- It is open to the Examining Authority to consider ways in which adverse impacts of a type that would be recognised by the JLDP could be reduced by the use of land outside of the application site.
- These alternative sites have been assessed for the development proposed by Land and Lakes.
- It is a material consideration for the Examining Authority as to the likelihood of the alternative land being available for development, given the urgent national need that is recognised by policy supporting the development of Wylfa Newydd.
- The fact that the site is not in the control of the Applicant and is stated not to be development that is being contemplated by the Applicant are both factors to which the Examining Authority can attach weight when determining the likelihood of the land being available and being used to meet this urgent national need. The weight to attach to these factors is a matter for the discretion of the Examining Authority.

Appendix 1.3 Welsh Language Framework

IACC response to HNP Application of a Welsh Language Skills Competency Framework During Construction and Operation (PINS ref: EN010007)

1. Point of principle

The developer needs to make explicit its commitment to developing an annually reviewed **Welsh Language Skills Strategy**. It is essential that the skills competency framework sit within a Welsh Language Skills Strategy, otherwise there is no vehicle for planning, setting aims/goals and reviewing progress over the course of the construction, operation and decommissioning phases of the project.

A Welsh Language Skills Strategy enables an employer to:

- i. Decide the levels of language competence required in the four aspects of language skills (understanding, speaking, reading and writing) for all posts in specific departments, teams and positions to enable the organisation to carry out its functions effectively and efficiently. (using HNP's proposed 'assessment tool')
- ii. Identify the language skills of the workforce (It is appropriate that the proposed competency framework be utilized here. In addition, HNP need to specify how Welsh language skills will be measured as part of recruitment procedures, as part of any Welsh language training undertaken in post, and as part of annual staff appraisal procedures.)
- iii. Identifying and closing Welsh language skills gaps by:
 - 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. (HNP need to specify how their annual Welsh language skills training will be provided to enable employees to achieve the Welsh language skills designated for their post.)

It would be acceptable for the developer to articulate its commitment to developing a Welsh language Skills Strategy in line with best practice and in consultation with IACC, North Wales Police, Welsh Language Commissioner.

HNP also need to describe how: job applicant's Welsh language skills will be assessed, how HNP's Welsh language skills training programme will fulfil the requirements of its Welsh Language Skills Strategy.

2. Detailed comments against sections of the report

Section / para	Issue	IACC's position (new text highlighted in yellow)
1.1	Background	acceptable
1.2	Horizon's commitment in DCO documentation sections 1.1 and 1.2 of Schedule 1 Welsh Language and Culture S106	See IACC response to the s.106 section referred to in this section and reproduced below Inadequate. An identified individual needs to be responsible for the implementation and review of the Developer's Welsh Language Policy. (LIR Chapter 9 section 7.10 and 6.9.2.7 – 6.9.5.10) Tenure of post/ responsibility for Welsh Language Policy to continue through construction, operation and decommissioning phases. 1.1 'a Welsh language skills strategy comprising of a Welsh language skills competency framework and assessment tool' (LIR Chapter 9 Section 6.9.2.7 – 6.9.5.10) It is essential that the skills competency framework sit within a Welsh Language Skills Strategy otherwise there is no vehicle for planning, setting aims/goals and reviewing progress. Satisfied with inclusion of 1.1.1 – 1.1.4 in Schedule 1.1.5 identify periodic timings for updates of the <u>framework</u> in consultation with the Council and the Welsh Government, (LIR Chapter 9 Section 6.9.2.7 – 6.9.5.10) and the Developer will thereafter implement the Welsh language skills competency framework and assessment tool <u>as part of its Welsh language skills strategy reviewed annually</u> until the end of Require commitment through Decommissioning phase

		Satisfied with inclusion in Schedule (but require commitment through Decommissioning Phase) (No specific ref. in LIR but identified in WLTME cost table)
1.3	Amendments to the draft s106 commitments 1.3.2 Horizon has proposed to amend the commitment to the Welsh Language skills competency framework to: • develop it in consultation with IACC, Gwynedd Council and the Welsh Government;	Acceptable
	• develop it utilising the emerging Welsh Government Diagnostic Toolkit (being produced by the National Centre for Learning Welsh);	Acceptable
	• follow the Council's 5-level workplace Welsh Language Skills Strategies document;	Acceptable
	• identify job roles which require Welsh language skills and the skill level or range of levels required;	Not only for Service interface situations but also to foster a bilingual working environment and the use of Welsh in the workplace in accordance with established best practice. (LIR, Chapt. 9, para 6.9.2.5)
	• identify those job roles which require level 3 or above Welsh Language Skills (for example identified public facing roles, the Community Involvement Officers); and	Also add 'and all other roles will be designated level 1 minimum requirement'.
	• identify periodic timings for updates in consultation with IACC and the Welsh Government.	identify periodic timings for Competency Framework updates in consultation with IACC and the Welsh Government.
1.4	How the Welsh language skills competency framework will be developed	Unacceptable It is essential that the developer's Welsh skills competency framework sit within a Welsh Language Skills Strategy otherwise there is no vehicle for planning, setting aims/goals, providing adequate Welsh language resources and training and reviewing progress against annual strategic aims. This needs to be made explicit in this document.
1.4.1 – 1.4.4		Acceptable

1.4.5	“Horizon considers that a recognised framework such as ALTE is preferable to labelling the Welsh language skills requirements of posts as ‘essential’ or ‘desirable’. Horizon considers that specifying levels of written and oral competence provides applicants with greater clarity whereas simply using the terms ‘essential’ or ‘desirable’ could dissuade those who may, for example, be confident Welsh speakers but have lower Welsh written skills.”	All posts should be assigned a Welsh language skills level requirement using the ALTE (or similar) 1 – 5 levels for speaking, listening, reading and writing. The Welsh skills levels designated for each post should be considered ‘essential’. An individual’s Welsh language skills will need to be assessed during the recruitment process. In the event of failing to recruit an individual with the appropriate skills, procedures for re-advertising the post as defined by the Welsh Language Policy / Welsh Language Skills Strategy will need to be implemented. In the subsequent event of failure to appoint a suitably qualified individual, other approaches e.g. provision of training / reallocation of responsibilities within a team etc. will need to be implemented.
Table 1-1	Example structure for Horizon’s Welsh language skills competency framework	Will require expert input to revise
1.5	How the Welsh language skills competency framework will be implemented	
1.5.1		Acceptable
1.5.2		Acceptable
1.5.3	Horizon’s Welsh language skills assessment tool will be used in conjunction with the Welsh language competency framework to plan what level of Welsh language skills are required for a post. The Welsh language skills assessment tool will involve a series of questions such as: • 'Does the post involve regular contact with members of the public, either face to face or over the phone?'; • 'Does the post involve liaison with local agencies and stakeholder organisations?'; • ‘Does the percentage of Welsh speakers in the team/department enable the provision of Welsh language services that meet the Welsh language needs of the public/workforce/stakeholders that engage with the team/department?’	Unacceptable. This paragraph also needs to reference the Welsh Language Skills Strategy of which the competency framework and language level for post assessment tool are a part. Also add another example question: does the percentage of Welsh speakers in the team / department foster bilingual working practices within this team / department

	1.5.4	Acceptable
1.5.5	During the operational phase, the implementation of the Welsh language skills competency framework and assessment tool will enable Horizon to:	Amend to 'During the construction, operational and decommissioning phases, the implementation of the Welsh language skills competency framework and assessment tool will enable Horizon to:

Appendix 1.4 Securing Mechanism for Visitor Centre

1. Overview

Horizon's commitment to providing an iconic and transformational permanent visitor centre (WNVC) (to include a viewing platform during the construction of Wylfa Newydd) is a very positive commitment to the island generally and North Anglesey specifically. There are significant opportunities presented by the proposed permanent visitor centre, which can be a major attraction (particularly wet weather), adding to the range of educational facilities on Anglesey and making an ideal stop whilst circumnavigating the coastal path, or visiting the North of the Island. It is critical that this facility is housed in a striking and iconic structure, which reflects and symbolises Anglesey's past heritage and future ambition, reflects and narrates the stories of the Island's people and places and combines an educational (encouraging young people in the STEM sector) and inviting visitor experience.

International research confirms that these facilities are significant to domestic tourism attractions.² Visitor centres enhance visitor enjoyment generally and energy developments specifically, with 68% of respondents attracted to visit by the visitor centre itself.³ In addition, they have been shown to positively shape public opinion, with some nuclear visitor centres operating as 'eco-fun houses' building customer support in a fun-filled educational atmosphere.⁴ The amount of 'construction tourism', which could be attracted to the island may be significant, given that North Anglesey will host the world's largest crane to construct Wylfa Newydd, which will itself be constructed utilising the world's second largest crane.

These world firsts and feats of engineering will appeal to some specialist markets. It is vitally important that the proposed visitor centre utilises cutting-edge interpretation to communicate the power of the plant, its role in low-carbon economies and Anglesey as an 'Energy Island' (considering partners such as tidal and marine energy). New energy tourism sites represent the landscapes of a possible future⁵ but they need to be supported by inspiring information structures. Virtual and augmented reality could easily communicate the significant scale of the project.

Key markets include:

- schools and education;
- day and staying visitors;
- cruise ship markets;
- residents and communities;

² Basaran, M. and Kantarci, K. 2015. The Evaluation of Impacts of the Construction of Nuclear Plant on Tourism Area in the Eye of Domestic Tourists, online at: https://www.researchgate.net/profile/Maria_Johann2/publication/281585512_The_perception_of_tourism_product_quality_and_tourist_satisfaction_the_case_of_package_holiday_travelers_visiting_Poland/links/58cb897692851c31f6552914/The-perception-of-tourism-product-quality-and-tourist-satisfaction-the-case-of-package-holiday-travelers-visiting-Poland.pdf#page=17

³ NFO Research 2003. http://www.tourismhelp.co.uk/objview.asp?object_id=458; Frantal, B. and Kunc, J. 2011. Wind turbines in tourism landscapes: Czech Experience, *Annals of Tourism Research*, 38(2): 499-519.

⁴ Tilson, D.J., 1993. The shaping of eco-nuclear publicity: the use of visitors' centres in public relations. *Media, Culture & Society*, 15(3), pp.419-435; Tilson, D.J., 1994. Eco-nuclear publicity: a comparative study in Florida and Scotland.

⁵ Frantal, B. and Urbánková, R., 2017. Energy tourism: An emerging field of study. *Current Issues in Tourism*, 20(13), pp.1395-1412.

- events;
- Wales Coastal Path (WCP) and Public Rights of Way users.

2. Key Features

The WNVC will showcase Anglesey's key appeals, embracing the old and the new. WNVC would need to:

- Tell the story of nuclear power and its contribution to the global and UK drive towards low carbon economies. State-of-the-art technology should be utilised to engage visitors in the need for low carbon and nuclear energy's contribution (other low carbon energy initiatives on Anglesey such as marine and tidal could also be featured). New technologies, media, film and virtual reality and augmented reality will be central to the WNVC, providing an immersive environment. Other features could explore the building of WNP and its associated facilities.
- In the course of preparatory works for WNP, very significant archaeological finds have been revealed. WNVC must showcase this story and make use of new and traditional technologies to simulate and tell the story of this unique find and related history. This is one of Europe's biggest archaeological digs; the 100,000m² site has uncovered:
 - One of the first Roman settlements in North Anglesey, dating between 43-410AD.
 - A wooden henge dating back to the Neolithic period or Roman Iron Age, with flint flakes dating back as far as 3,000BC. The henge would have dominated the landscape and been an important ritual focus. Links could be made with the other major Neolithic sites around Anglesey.
 - A Bronze Age round house.
 - Roman industrial activity, extraction of copper from Parys Mountain (which could tie in with the new interpretation planned for the Copper Kingdom).
- This would provide a unique facility to showcase Welsh legends i.e. the Mabinogion and key stories with an Anglesey/ North Wales focus, which people would pass on the WCP and the wider PRoW network.
- Recognising its significance for North Anglesey WNVC will act as a showcase for Anglesey crafts and produce, providing a valuable retail space, highlighting local producers' stories.
- The food offering is a key component of a successful attraction and visitor centre. Horizon's commitment to a learning café/restaurant is welcomed. As well as providing a valuable, high quality eatery, it will act as a training/experience facility for hospitality and catering students, building partnerships with the local FE sector.
- Wales Coastal Path interactive routes around Anglesey could be showcased, highlighting local stories. Here the WNVC could take as a model the exhibition centre at the Cliffs of Moher in Ireland.

3. Public Rights of Way and Wales Coastal Path

It is essential that the Visitor Centre provides an attractive and enhanced offer for walkers of the Wales Coastal Path and Public Rights of Way. The Visitor Centre needs to be directly accessible from the diversion route of the Wales Coastal Path and Public Rights of Way at the operation stage. The Centre should provide adequate parking area and facilities including café and picnic benches for walkers and should include adequate space to promote the walking offer, including interpretation boards, signage, etc.

4. A Quality Exhibition Space and Attraction

WNVC should make use of cutting-edge technologies such as VR/AR, interactive boards, digital reconstructions and digital projection technology. This combination would produce immersive and exciting interactive experiences e.g. through VR or digital projection you could experience the power of nuclear technologies. The harvesting of this power deserves this. The new immersive art installation in Paris gives an indication of how such technologies could be harnessed. Here a room is dimly illuminated, before 140 projectors scattered across the room project images on to the walls - in this case of a grand salon which gives way to 'a riot of colour and figurative forms [linking]... exuberant yet intricate images projected onto the walls...' The art envelopes you, towering over you, disintegrating into showers of pixels before reforming into other images. Such encounters are sensorially immersive, capturing our attention and interest. These kinds of digital techniques offer scope to provide a dramatic immersive environment, which could enable the Island's stories to be uniquely told.

5. Examples

These are examples based on achieving educational and informative centres that are appealing and entertaining to the general public and family audiences. They can also cater well for school visitors in booked groups. The content would require specialist development and there are important editorial and marketing considerations around this (e.g. catering for a range of viewpoints, ensuring compatibility with the school curriculum) . Comparator Visitor Centres include:

- The Cliffs of Moher <https://www.cliffsofmoher.ie/>
- Manchester Arts Centre <https://www.visitmanchester.com/things-to-see-and-do/the-whitworth-p85251>
- Extension to the Tate in St Ives <https://www.tate.org.uk/visit/tate-st-ives/visit-tate-st-ives-family>

5.1. Example of centre approx. 1000m²

Public areas

- Entrance/communal area (c. 100m²)
- Interactive exhibition space (c. 150m²)
- A/V immersive space (c. 50 m²)
- Classrooms/workshop spaces (c. 150 m²)
- Circulation areas, toilets (c. 100 m²)

- Café/school lunch area (c. 100 m²)
- Shop (c. 100 m²)

Non-public areas

- Office, staff areas (c. 100m²)
- Storage, services (c. 150m²)

5.2. Example of centre approx. 1800m²

Public areas

- Entrance/communal area (c. 150m²)
- Interactive exhibition spaces (c. 400m²)
- A/V immersive space (c. 100m²)
- Theatre/lecture hall for 100 people (c. 200m²)
- Classrooms/STEAM workshop spaces (c. 200 m²)
- Circulation areas, toilets (c. 150 m²)
- Café/school lunch area (c. 150 m²)
- Shop (c. 100 m²)

Non-public areas

- Office, staff areas (c. 150m²)
- Storage, services (c. 200m²)

5.3. Example of centre approx. 3000m²

Public areas

- Entrance/communal area (c. 200m²)
- Interactive exhibition spaces (c. 1000m²)
- A/V immersive space (c. 200m²)
- Theatre/lecture hall for 100 people (c. 200m²)
- Classrooms/STEAM workshop spaces (c. 200 m²)
- Circulation areas, toilets (c. 200 m²)
- Café/school lunch area (c. 200 m²)
- Shop (c. 200 m²)

Non-public areas

- Office, staff areas (c. 200m²)
- Storage, services (c. 400m²)

5.4. Interactive exhibition spaces

A collection of hands-on interactive exhibits focussing on science and related content to the work at Wylfa Newydd. This could include energy, nuclear science, heritage and archaeology and environmental issues. The area might be divided into subject themes to aid comprehension and graphics and labels would convey details. It should include scenography, and lighting and supplementary AV/AR/VR to add to the impact. This creates a popular 'core' to the centre appealing to both family audiences and school visitors and capable of operating in a flexible way – important due to the variability in visitor numbers that will be experienced at different times.

Although several interactive exhibits will be available 'off-the-shelf', they will need housing to fit with the design style of the space, and many of the exhibits will require bespoke development and design – this process can involve the community but also requires specialists to get right. Wear and tear is significant and maintenance must be thorough. Content would require periodic updating and refreshment (5-10% per year).

5.5. A/V immersive space

Digital technology now makes possible a range of high impact immersive experiences, e.g. involving 3D or interactivity. It is recommended that a proven system e.g. Ars Electronic's [Deep Space](#) be used. Those that offer a lot of flexibility for future updating are recommended. A range of bespoke content would need expert development and periodic updating. Some systems can be installed in a conventional lecture theatre, but this is very limiting and can interfere with other uses of the theatre space.

5.6. Theatre/lecture hall for 100 people

A multi-purpose space for talks and presentations. This can include corporate events as well as public programmes. For the public, participatory shows are particularly popular involving special effects and demonstrations and the theatre should be equipped with good preparation and storage spaces close to the stage. Several shows need to be pre-developed with relevant content with staff trained to perform them. These are a good way to absorb greater numbers at busier times. The degree of raking of seating and height of stage require special consideration, especially with younger visitors.

5.7. Classrooms/STEM workshop spaces

For group activities and school events, classroom spaces are needed. At busy times, workshops for family audiences are popular and can help absorb numbers at busy times. These are usually timed sessions with a staff member leading participants through a task or challenge. Several workshops need to be developed with entertaining and appropriate content and reliable props and equipment. Ideally there will be more than one and they will be equipped for different uses, for example one as a science lab and one as a maker-space. Spaces that can be subdivided are ideal, and plenty of storage nearby is important.

6. Conclusion

Horizon's commitment to providing an iconic and transformational visitor centre early in the project is welcomed. This will not only provide a high quality tourist visitor attraction to North Anglesey, but will also provide an interactive educational centre for children and young people to learn about energy, archaeology, history and culture. The proposed visitor centre will also be a 'community hub' for the residents of North Anglesey with a café, meeting rooms etc. This will provide a much needed facility for local residents, many of who lost this space with the closure of the Wylfa Sports and Social Centre.

The link to the Wales Coastal Path is also critical. With the inland diversion of the Coastal Path, the IACC see the Visitor Centre as a key meeting point for walkers to

park, use the café and facilities and this should be linked to other attractions along the route.

The IACC would welcome further discussions on the design of the proposed visitor centre, including parking, landscaping etc. The IACC would also encourage Horizon to undertake a public consultation on the proposed visitor centre to gain the views of local residents, communities, tourism providers, groups and schools to ensure that the facility meets the needs and expectations of local people and leaves a positive lasting legacy from the Wylfa Newydd project.

APPENDIX C

IACC Responses to Actions set in Issue Specific Hearing on 8 January 2019

Appendix 1.1 Engagement with Dafydd Griffiths

The IACC notes Horizon's intention to arrange a meeting between Mr Griffiths, Voirrey Costain, and members of the A5025 Off-line Highway Improvements design team so that each of his concerns can be considered in turn. The IACC shall await Horizon's formal response to Mr Griffiths' post hearing submission at Deadline 7 (14th March 2019).

Appendix 1.2 Securing Contractual Engagements through DCO

In addition to the comments made by IACC in its response to HNP Workforce Management Strategy (Appendix J) IACC also has the following comments with regards to HNPs Appendix 1.2 submission regarding securing contractual engagements through the DCO.

HNP's submission is that it will be the responsibility of Tier 1 Contractors to ensure compliance with any sub-contractors they appoint.

As the authority charged with responsibility for enforcing the DCO and its Requirements IACC must have clearly identified parties against whom effective enforcement can be pursued, throughout the process of construction and operation. In addition to whoever else might be subject to enforcement at any point, this must always include the Undertaker identified in the DCO.

Detail supplied by HNP on contractual flow down of DCO compliance responsibilities, all the way to terms to be agreed by individual workers on site, depending on the adequacy of that detail, provide reassurance of the steps to be taken by the Undertaker to achieve compliance and avoid breaches. That contractual flowdown, however configured, will not remove the undertaker from being the primary point of enforcement by IACC.

Appendix 1.3 Raw Data on the Existing Traffic Flows and Future HGV Growth on A5025 & Appendix 1.5 Early Years Strategy

Introduction

This note has been prepared by the Isle of Anglesey County Council ("IACC") following a review of the document submitted by Horizon Nuclear Power Wylfa Limited' ("Horizon") at Deadline 5 titled:

Horizon's Deadline 5 Responses to actions set in Issue Specific Hearing on 8 January 2019; Appendix 1-3 Raw Data on the Existing Traffic Flows and Future HGV Growth on the A5025 and Appendix 1-5 Early Years Strategy [REP5-054]

This note also corresponds with the IACC's response to Horizon's answers to Q2.11.6, Q2.11.13 and Q2.13.10 of the Further Written Questions issued by the Examining Authority.

The information within this note shall seek to illustrate the permissible significant percentage increase in **daily** HGV traffic along the A5025 at Llanfachraeth should Horizon's proposed Early Years HGV caps be implemented. For the purposes of this assessment, the IACC defines the Early Years of the Project as the period between the commencement of any activity/work approved under the DCO Project and the opening of the A5025 Off-Line road improvements. Horizon's proposed Early Years HGV caps are as follows:-

- Monthly Max movements – 2,500 HGV movements each way (5,000 Two-Way);

- Hourly Max movements – 22 HGV movements each way (44 Two-Way); and
- Daily Max movements – 160 HGV movements each way (320 Two-Way).

Methodology

The methodology of this assessment is as follows:-

1. Identify initial daily HGV baseline flows (Two-Way) for the year 2016 at Llanfachraeth without committed development HGV traffic.
2. Identify daily committed development HGV traffic flows (Two-Way) on the A5025 between Valley and the Wylfa Newydd site.
3. Incorporate the committed development HGV traffic flows into the initial daily HGV baseline flow for 2016 to determine the **daily HGV Baseline Flows including Committed Development traffic** for the year 2016 to be taken forward for assessment.
4. Apply a Traffic Growth Factor to the daily HGV Baseline Flows incl. Committed Development traffic determined in step 3 to identify the future daily HGV baseline flows incl. committed development traffic for all years between 2016 and 2022 (i.e. the Early Years).
5. Undertaken an assessment to determine the significant numerical increase in HGV traffic along the A5025, between the years 2020 and 2022, by assessing the percentage increase of additional daily maximum 320 (Two-Way) HGV movements permissible within Horizon's Early Years caps on top of the future daily HGV baseline flow incl. committed development traffic.

Assessment

1. HGV Baseline Flows (without committed development traffic)

For the initial baseline HGV traffic flow, the IACC has applied the 162 (Two-Way) Daily HGV flow established by Horizon for the year 2016, as identified within the DCO Transport Assessment [APP-101].

2. Committed Development traffic

A further component of the baseline traffic flows is the traffic associated with committed developments. On the A5025 the traffic associated with the on-going decommissioning of the existing Magnox nuclear power station provides an important component of the traffic associated with committed developments. The IACC have applied the value of 38 (Two-Way) HGV movements per day i.e. 19 HGVs travel to and then from the Magnox site each day.

The IACC has not included HGV traffic associated with National Grid's North Wales Connection Project as part of the A5025 HGV baseline flows, as it is now understood that construction traffic associated with the project is not expected to route along the A5025 between Valley and Wylfa until May 2022 i.e. after the opening of the Off-Line improvements.

3. HGV Baseline Flows including Committed Development traffic

For the purposes of this assessment, the IACC has incorporated the committed development traffic flows (Magnox decom.) into the initial baseline flows to identify a **2016 HGV Baseline Figure of 200 HGV (Two-Way) daily movements on the A5025 at Llanfachraeth.** ($162+38 = 200$).

4. HGV Traffic Growth

The IACC has then applied a Traffic Growth Factor on the baseline flow based on the methodology applied by Horizon, described in the Section 9.2 of the DCO Transport Assessment. A summary of the Traffic Growth Factors are presented in the following table extracted from the DCO Transport Assessment:-

Table 9-1 Traffic growth factors

Vehicle type	Growth from 2016 to 2020	Growth from 2016 to 2023	Growth from 2016 to 2033
Car	5%	7%	13%
Light goods vehicle	11%	19%	45%
Heavy goods vehicles	3%	5%	15%

The IACC has applied a 3% annual increase onto the 2016 HGV Baseline Figure of 200 HGV (Two-Way) daily movements incl. committed development traffic in accordance with the Traffic Growth Factors stated above. This enabled the IACC to determine the HGV baseline Flows for all years between 2016 and 2022 i.e. the time period up to the anticipated opening year of the A5025 Off-Line improvements.

The HGV Baseline Flows for all year between 2016 and 2022 can be seen in Table 1 below:-

Year	3% HGV Growth Factor increase per annum	Future HGV Baseline Flows
2016		200
2017	$200 + 3\% =$	206
2018	$206 + 3\% =$	212
2019	$212 + 3\% =$	219
2020	$219 + 3\% =$	225
2021	$225 + 3\% =$	232
2022	$232 + 3\% =$	239

Table 1: Future Years HGV Baseline Flows incl. committed development traffic

5. Determine the significant numerical (percentage) increase in HGV traffic along the A5025

Having established HGV Daily Baseline Flows for all years between 2016 and 2022 (i.e. the Early Years), the IACC has undertaken an assessment to determine the significant numerical (percentage) increase in HGV traffic along the A5025 up to the year 2022. The assessment is primarily based upon determining the percentage increase of additional daily maximum 320 (Two-Way) HGV movements permissible within Horizon's Early Years caps on top of the future daily HGV baseline flow incl. committed development traffic.

The findings of the assessment can be seen in Table 2 below. To help explain how the findings of assessment have been derived, the commentary below has been provided.

Column 1 provides a list of activities that are to be undertaken during the construction of the Wylfa Newydd DCO Project. This list of activities has been obtained from Appendix 1-1 of Horizon's response to the IACC's Traffic and Transport chapter of the Local Impact Report [REP3-004], titled 'Source Data for Figure 7-6 of DCO Transport Assessment'.

Column 2 identifies the month/year each activity is expected to commence and/or complete within the years 2020, 2021 and early-2022. The month/year identified in this column have been updated to reflect recent changes in the programme and/or phasing strategy, i.e. MOLF to open April 2022, A5025 Off-Line improvements to open February 2022, etc.

Within Column 2, Horizon's proposed Monthly, Daily and Hourly HGV caps (Early Years) are listed up to and including February 2022, which is the anticipated opening month of the A5025 Off-Line improvements. Following this month, Horizon's Early Years HGV caps would not apply.

Column 3 seeks to illustrate the significant percentage increase in HGV daily traffic permissible within Horizon's Early Years Daily HGV cap of 320 (Two-Way) HGV movements.

The future HGV Daily Baseline Flows for the years 2020, 2021, and early-2022 are identified, listed as 225, 232 and 239 respectively in accordance with Table 1 above.

The additional daily maximum 320 (Two-Way) HGV movements permissible within Horizon's Early Years caps are then assessed against the HGV Daily Baseline flows to determine the percentage increase in daily HGV flows. For example, future HGV baseline (Two-Way) flow of 225 HGVs and additional 320 (Two-Way) HGVs = $(320 / 225) * 100 = \mathbf{142\% \text{ increase}}$.

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COLUMN 1						COLUMN 2				COLUMN 3					
Activities in Early Years						HNP proposed HGV caps Early Years									
						Month-Year	Monthly Max Movements [Two-Way]	Daily Max Movements [Two-Way]	Hourly Max Movements [Two-Way]	2020 Daily HGV Flows	% increase in Daily HGV flows	2021 Daily HGV Flows	% increase in Daily HGV flows	2022 Daily HGV Flows	% increase in Daily HGV flows
Site Mobilisation and Access	MOLF	Power Blocks	Consumables and Waste (WNTA)	Temporary Worker Accommodation	A5025 Off-Line Improvements	Plant Requirements	Oct-19	5000	320	44					
							Nov-19	5000	320	44					
							Dec-19	5000	320	44					
							Jan-20	5000	320	44	225	142%			
							Feb-20	5000	320	44	225	142%			
							Mar-20	5000	320	44	225	142%			
							Apr-20	5000	320	44	225	142%			
							May-20	5000	320	44	225	142%			
							Jun-20	5000	320	44	225	142%			
							Jul-20	5000	320	44	225	142%			
							Aug-20	5000	320	44	225	142%			
							Sep-20	5000	320	44	225	142%			
							Oct-20	5000	320	44	225	142%			
							Nov-20	5000	320	44	225	142%			
							Dec-20	5000	320	44	225	142%			
							Jan-21	5000	320	44			232	138%	
							Feb-21	5000	320	44			232	138%	
							Mar-21	5000	320	44			232	138%	
							Apr-21	5000	320	44			232	138%	
							May-21	5000	320	44			232	138%	
							Jun-21	5000	320	44			232	138%	
							Jul-21	5000	320	44			232	138%	
							Aug-21	5000	320	44			232	138%	
							Sep-21	5000	320	44			232	138%	
							Oct-21	5000	320	44			232	138%	
							Nov-21	5000	320	44			232	138%	
							Dec-21	5000	320	44			232	138%	
Site Mobilisation and Access							Jan-22	5000	320	44				239	134%
							(Offline) Feb-22	5000	320	44				239	134%
							Mar-22	7000	320	80				239	134%
							(MOLF) Apr-22	7000	320	80				239	134%

Table 2: IACC assessment of Horizon's proposed Early Years HGV caps

Findings

The assessment demonstrates a significant percentage increase in Daily HGV flows should Horizon's Early Years caps be implemented. For example, the year 2021 has a HGV Daily Baseline flow of 232 HGVs (Two-Way). If Horizon sought to route 320 HGVs Two-Way movements along the A5025 in a day in accordance with their proposed HGV Early Years cap, a 138% increase in HGV traffic would occur.

Such a potential percentage increase can be classified as a 'Large/Significant' magnitude of change when assessing against table 3 below. This table contains thresholds used to determine whether changes/effects are considered Negligible, Small, Medium or Large. Within this table, neither the sensitivity of receptors, nor the duration of effects, is taken into consideration. This table is formed using Institute of Environmental Management and Assessment (IEMA) Guidelines, the Design Manual for Roads and Bridges (DMRB) and professional judgement.

Criteria for determining magnitude of change for topic receptors				
Impact	Negligible	Small	Medium	Large
Severance	Increase in total traffic flows of 29% or under (or increase in HGV flows under 10%)	Increase in total traffic flows of 30-59% (or increase in HGV flows of between 20-39%)	Increase in total traffic flows of 60-89% (or increase in HGV flows between 40-89%)	Increase in total traffic flows or HGV flows of 90% and above
Fear and Intimidation	Increase in total traffic flows of 29% or under (or increase in HGV flows under 10%)	Increase in total traffic flows of 30-59% (or increase in HGV flows of between 20-39%)	Increase in total traffic flows of 60-89% (or increase in HGV flows between 40-89%)	Increase in total traffic flows or HGV flows of 90% and above
Pedestrian Amenity	Increase in total traffic flows of 49% or under	Increase in total traffic flows of 50-69%	Increase in total traffic flows of 70-99%	Increase in total traffic flows of 100% or above

Table 3: Thresholds to determine magnitude of change

IACC stance

The IACC acknowledges that such an increase in HGV traffic would not occur every day due to the constraint of the Monthly Early Years cap of 2,500 HGV movements each way (5,000 Two-Way).

The IACC also acknowledges that these HGV movements in the early years of the project are directly related to constructing essential mitigation for the project. However the Authority considers a maximum 40% increase in daily HGV traffic above baseline flows (incl. committed development traffic) along the A5025 would be more appropriate prior to the opening of the Off-Line bypasses.

The imposition of a maximum 40% increase in daily HGV traffic will make this issue acceptable to the IACC, as well as ensuring the interests and safety of local residents whom currently reside adjacent the A5025 are safeguarded. These included residents located at Valley, Llanynghenedl, Llanfachraeth, Llanfaethlu, Llanrhyddlad, Tregele, etc. whom would be directly impacted by construction traffic.

Appendix 1.4 Transport impacts of early delivery of TWA

The Hearing action point is identified in Table 1.1 as:

- “4 To include impact of HGVs in the note that they are preparing about the potential to bring forward the phasing of the Temporary Worker Accommodation.”

In Appendix 1.4, reference is made to Figure 7-6 of the DCO Transport assessment which shows the profile of construction vehicle movements, and an annotated version is provided. This is reproduced below (note: with additional highlighting of the months referred to in Appendix 1.4). As set out in paragraph 7.5.3 of the TA, the coloured columns show monthly HGV movements (left-hand axis). The red line shows hourly movements (righthand axis).

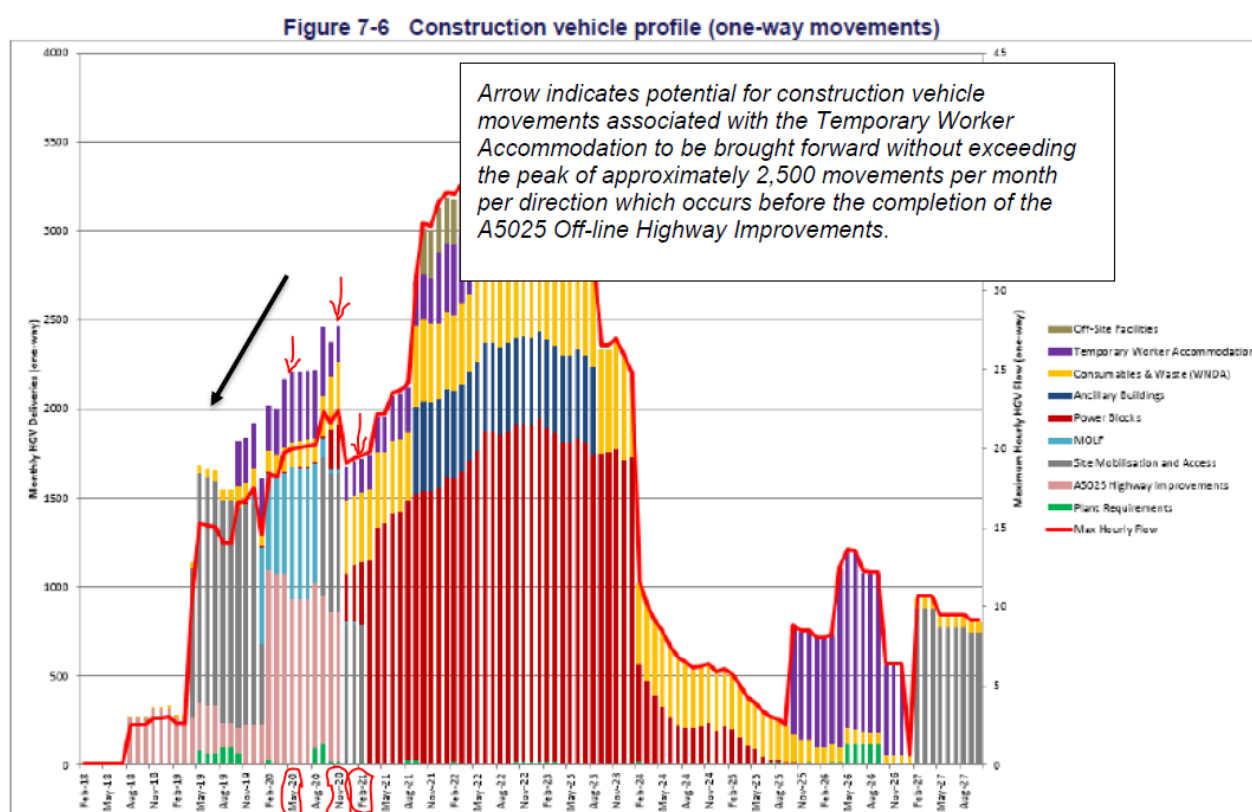


Figure 7-6 shows that construction vehicle movements associated with the Temporary Worker Accommodation (TWA) occurs between October 2019 and January 2022.

In Appendix 1.4, it is identified that the maximum construction movements related to the TWA occur in May 2020, comprising 500 one way HGVs (1,000 two-way) in the month which equates to 22 HGVs (44 two way) per day (based on 22 working days), or 2 – 3 HGVs (4 – 6 two way) per hour. In Appendix 1.4, it is stated that from February 2021, the number of one-way HGVs drop to 250 per month, which is reflected in the overall drop in construction vehicle movements in the construction programme.

In Appendix 1.4, it is stated that the number of TWA related construction vehicle movements could be increased to bring forward its delivery without increasing the total number of construction vehicle movements above the peak shown in November 2020. The annotated Figure 7-6 indicates potential for construction vehicle movements associated with the Temporary Worker Accommodation to be brought forward without exceeding the peak of approximately 2,500 movements per month per direction which occurs before the completion of the A5025 Off-line Highway Improvements.

However the IACC, as local Highway Authority, are concerned with the proposed number of additional HGV movements along the A5025 prior to the Off-Line improvements being completed, as described in the Traffic and Transport chapter of the Local Impact Report [REP2-070]. Therefore, the IACC would not object to accelerating/bringing forward the delivery of the TWA, subject to the A5025 Off-Line

improvements being fully completed and operational in line with the Mitigation Phasing Strategy, as well as fully adhering to the HGV caps (post-Offline improvements) which are secured in the CoCP.

In paragraph 1.2.8 of Appendix 1.4 it is stated that the early delivery of the Site Campus is limited by a range of other factors.

Appendix 1.5 Early Years Strategy

In addition to comments made in 1.3 above the IACC has the following comments also:

1. In reference to Horizon's proposed Early Years HGV caps, please refer to report produced by the Highways Department in response to Horizon's 'Deadline 5 Response to actions set in Issue Specific Hearing Action on 8th January 2019: Appendix 1-3: Raw Data on the Existing Traffic Flows and Future HGV Growth on the A5025 and Appendix 1-5: Early Years Strategy'
2. The IACC welcomes Horizon's commitment for shuttle buses to use the four proposed Park & Share sites delivered by both IACC and Gwynedd Council (funded by Welsh Government).
3. The IACC would seek to agree upon the phased delivery of parking provision during the construction period of the project. This is to ensure the IACC, as the Local Highway Authority, are satisfied the parking provision made available by Horizon at different stages of the construction project is appropriate to accommodate the fluctuating number of workers on the Wylfa Newydd DCO Project.
4. Horizon propose to submit a Travel Report to the Transport Engagement Group each quarter during the Early Years. The IACC would note that a Travel Report may need to be submitted more frequently than per quarter, particularly during the initial weeks/months of the commencement of the DCO Project.
5. IACC seeks further information on how Horizon will control the discharge of construction vehicles from the WNDA. The IACC believes a lack of discharge control may lead to HGV convoys on the A5025, etc. Clarification is sought on the technological/control system that will be implemented at the WNDA to control the discharge of HGVs. The IACC would expect a similar system to be implemented at the WNDA to what is currently proposed at the Logistics Centre.
6. The IACC welcomes the proposal to implement further mitigation measures at Llanfachraeth prior to opening of the Off-Line bypasses. The IACC is of the opinion such measures are necessary to mitigate impacts that will arise as a result of any increase in the number of HGV traffic through the village.

Appendix 1.6 Horizon and WG Position on Issues Relating to HGVs on Britannia Bridge

The Hearing action point is identified in Table 1.1 as:

"11. WG and Applicant to agree a list of projects (including potentially the proposed third Menai crossing) which need to be assessed for cumulative effects."

Horizon considers it unnecessary to impose peak hour restrictions of HGV movements at Britannia Bridge and that the transport impact of Wylfa Newydd has no substantial impact at Britannia Bridge and the Menai Bridge to justify funding a third bridge.

In Section 1.2 of Appendix 1.6, it is argued that there will be only a small number of HGVs that will travel to the mainland in the morning peak period when the predominant flow over Britannia Bridge is eastbound.

The information provided in Section 1.2 which considers the morning period doesn't include any HGV numbers and is silent on the recent request by Horizon for an extension of the time period for HGV movements which would have implications on the time of arrival/departure at the Logistics Centre.

In Section 1.3 which considers the evening period when the peak direction of travel on Britannia Bridge is westbound, it is identified that there would be 13 – 14 HGVs in each direction in the evening peak hour and that there would be a delay of 23 seconds per vehicle in the peak direction (westbound). This would equate to an additional 5 ½ minute delay at the bridge, which is not insignificant. The assumption is also that there would be a flat profile of HGVs based on the restriction proposed by Horizon of 160 HGVs per direction per day over a 12 hour day. In reality, there is likely to be peaks in movements which would result in a higher number than the identified 13 – 14 HGVs in one direction.

Conclusion

Appendix 1.6 doesn't properly address the Hearing action point and doesn't adequately justify Horizon's argument against peak hour restrictions of HGV movements at Britannia Bridge.

Appendix 1.7 Projects to be considered for Cumulative Effects

Appendix 1.7 to REP5-054 indicates that WG appears to have reached an agreement with Horizon that insufficient environmental information is available with respect to the Third Menai Crossing and other highway development schemes (as cited by WG into the Examination process) for Horizon to include these developments in their cumulative impact assessment. IACC notes the requirement for Horizon to consider the effects of these schemes with respect to traffic issues once information becomes available.

IACC considers that the necessary traffic data and assessment to consider taking forward a third crossing proposal must be available by WG to share and that there is no reason why Horizon should not consider that data. IACC expects that such assessment would include an appraisal of existing and projected traffic flows, congestion and journey delays supported by at least some preliminary predictive traffic modelling. Accordingly, specific issues with respect to traffic management requirements during the construction phase of Wylfa Newydd, the Third Menai Crossing and other highway schemes could have been explored and resolved in much greater detail than has been achieved to date.

IACC has outstanding concerns with respect to arrangements for traffic management (such as temporary access and diversion/stopping up of existing access) that will need to be in place to enable the construction of the Third Menai Crossing. Such arrangements may have the potential to lead to significant congestion and driver delay on the approaches to and in the vicinity of the existing bridge crossings which should be considered by Horizon's transport assessment.

Appendix 1.8 HGV Tracking on Britannia Bridge

The Hearing action point is identified in Table 1.1 as:

"12. Applicant to provide detail regarding the DMAT tracking of HGVs over the Britannia Bridge and whether it is proposed that HGVs would use the bridge during the morning and afternoon peaks."

In Section 1.2 of Appendix 1.8, the information on the Distribution Management Asset Tracking System (DMATS) which is included in the Code of Construction Practice (CoCP) submitted at Deadline 5 is

provided. This sets out an overview of the system and adds that the system has the capability of tracking HGV movements on Britannia Bridge.

The remainder of Appendix 1.8 is a repeat of Appendix 1.6 and sets out Horizons argument against restrictions of HGVs on Britannia Bridge.

Conclusion

Appendix 1.8 does provide information on DMATS and confirms that HGVs can be tracked over Britannia Bridge, but doesn't volunteer that this will be part of the tracking system.

As concluded for Appendix 1.6, Appendix 1.8 doesn't adequately justify Horizon's argument against peak hour restrictions of HGV movements at Britannia Bridge.

APPENDIX D

IACC Responses to Actions set in Issue Specific Hearing on 11 January 2019

Summary review of action responses

Action	Summary	IACC Notes
Appendix 1-2 Appendix 1-1 2010-2011 Survey Appendix 1-2 2012 Survey Appendix 1-3 2013 Survey	Submission of reptile survey data information	- There appears to be some inconsistency between the Reptile TSR and the survey reports provided regarding the survey years; Section 1.5 of the Reptile TSR suggests surveys were undertaken in 2008, 2010, 2011, 2013 and 2014, with Table 3.2 summarising the survey results for 2010, 2011, 2013 and 2014. Based on the survey reports provided (2008 is not provided, but this is not a particular concern), it appears the surveys were actually undertaken in 2010, 2011, 2012 and 2013 (so the most recent survey is 5 survey seasons old) – can the survey years be confirmed? - The earlier surveys (principally 2010 and to some extent 2011) do not appear to reflect the contemporaneous guidance on survey effort (either density of refugia or number of survey visits), or timings / weather conditions, and so these data are not as reliable as they could be (which has some relevance as subsequent surveys were to some extent based on the results of these surveys). - The survey effort for the 2012 and 2013 surveys is closer to the contemporaneous guidance for determining presence / probable absence of reptiles, but not with the guidance on the effort typically thought necessary to reliably estimate population size class. - There are several constraints in each survey year and therefore IACC does not agree with Horizon's view that the sum of 4 years' survey data ensures that these constraints can be ignored; and we are not as convinced as Horizon in the robustness of the survey data for estimating size class due to concerns regarding survey effort. From experience, their size-class assessment is probably accurate, and the later surveys are more robust, but we do not think the data are as robust as suggested and that a precautionary approach to this aspect is consequently warranted.

Appendix 1-3	Submission of Post Hearing Note (PHN) on construction/operation of monitoring for Adders and common lizards and the securing methodology	- The PHN provides a useful starting point for construction / operation monitoring. However, rather than simply 'surveys for presence' IACC believes that more detailed population monitoring surveys are appropriate, particularly given the residual uncertainties in the current survey data. - IACC therefore consider that capture-mark-recapture (CMR) techniques would be appropriate to allow the population size and dynamics to be more reliably estimated (principally adders, as these techniques are often less successful for lizard species). These should be carried out as follows: - Across the development site and receptor area, prior to site clearance, to ensure a robust baseline for the translocation. - Biennially at and near the receptor site and displacement areas for the duration of the construction period. - Biennially at the above areas and at restored habitats / key corridors for the post-construction monitoring period (10 years). - The standard presence / absence surveys proposed by Horizon should also be employed every other year at the above locations.
Appendix 1-4	Submission of note on additional detail on the mitigation for S.7 Habitats loss.	The data meet our needs, although it would be useful if Horizon could confirm the proportions of each S.7 habitat that will be in areas managed primarily for biodiversity.
Appendix 1-7	Clarifications regarding Park and Ride Flood Risk	- Response covers the key areas related to submitted FCA addendum – confirms no flooding expected along the spine road or of car parking spaces. Justification given and basis is acceptable. - Please refer separately to IACCs comments regarding Appendix 1-9
Appendix 1-8 Technical Note on A5025 flooding (Llanfachraeth)	A5025 Flooding (Llanfachraeth)	IACCs position is that the proposal to allow flooding on private land from the A5025 section3 (Llanfachraeth) is contrary to policy TAN15. Details of the discussions between HNP and the landowner regarding the legal agreement are noted.
Appendix 1-9	Culvert Blockage Dalar Hir	Culvert blockage modelling presented, takes a conservative approach (100%

Updated Modelling to include the Possible Blockage of Culverts within Dalar Hir		blockage of the A5/A55 culvert) to ascertain area/depth of inundation under baseline/with development scenarios. • The modelling does not assess the proposed spine road crossing – in IACCs view this is the most vulnerable, as debris from the upstream Nant Dalar Hir would be first caught against this structure, rather than the A5/A55 culvert 100m downstream. If this happened, the spine road/car parks could be inundated to a degree, as the blocked flood water spilled over and re-entered the Nant Dalar Hir downstream. The levels given in Table 3.2 when compared to para 3.2.1 support this inundation occurring. • The modelling of the A5/A55 culvert blockage finds the overall depth increase is limited, and the proposals result in a slight betterment over the baseline scenario (as expected since the flood storage areas provide slightly more capacity) • Whilst the approach for the A5/A55 taken is acceptable and the resulting conclusion that the operational site would not be at risk if the culverts were to block demonstrates the proposals comply with TAN-15, either the modelling should include modelling of a blockage to the spine road crossing, or justification as to why this is not required. For example para. 2.1.3 indicates the NRW “were concerned not about debris from off-site, but debris generated on site” – is the rationale that the type of debris generated on site would be unlikely to block the spine road crossing on the basis of the size of culvert proposed (so no culvert blockage assessment required?); whereas the A5/A55 culvert has smaller dimensions and is therefore considered vulnerable to blockage? Further detail is required to provide this clarification or modelling should be provided.
Appendix 1-10 Supplementary sewage (bacteria) modelling for the Wylfa Newydd Project	Sewage (bacteria) modelling for Project	IACC will be seeking confirmation of NRW's review of this assessment. As previously confirmed IACC requires confirmation that the Wylfa Newydd project will not impact on the water quality of Cemaes Bathing Water.

APPENDIX E

PART 1 - IACC COMMENTS ON THE DRAFT DEVELOPMENT CONSENT ORDER INCLUDING REVISIONS (AND SUMMARY TABLE OF AMENDMENTS TO THE DRAFT DCO)

Article 2 definitions commence

The IACC notes the amendment to item a) site preparation to restrict those works to sites other than Wylfa Newydd site, IACC welcomes the amendment and considers it to be positive progress. The IACC however maintains its objection to item j) erection of temporary building structures or enclosures without some caveat limiting the size and scale of these in particular on the Dalar Hir site (Work No 6).

Article 2 definitions; first nuclear concrete

The IACC has some concerns with this definition as it is not entirely certain. The interpretation of both 'first' and 'irreversible' construction will to be matters of professional judgement which could create dispute.

Article 2 definitions; maintain

The IACC notes that there has been no revision to the definition of maintain and it continues to object to the scope of this definition as set out in the Council's previous submissions.

Article 19 Construction and maintenance of altered streets

The IACC notes that in article 19(1) that the obligation to maintain new streets has been restricted to those affected by the offline highway works. This therefore does not cover streets altered under any other works including those to access the main site from the A5025. The IACC accordingly does not accept that this article is sufficient.

In article 19.3 it is noted that the offline highway sections have been removed from the provision where they are deemed to be public highways on completion. The IACC would be pleased to receive an explanation of when these will be deemed to be dedicated as public highway.

Article 27 Compulsory acquisition of rights

IACC notes the deletion of sub section 6 which created a right to compensation for the loss of private rights or imposition of restrictive covenants. The IACC strongly questions the appropriateness of that deletion.

Article 36 Temporary use of land for maintaining the authorised development

The IACC notes and welcomes the addition to article 36(2) of highway land at item c).

Part 5: Compulsory acquisition: funding of compulsory acquisition

The IACC suggests that in the circumstances where the parent company of the Applicant has publicly stated that it will not fund the development and therefore that it is entirely possible that the parent of the Applicant will change in the future to an unknown party, a new article should be inserted providing that no compulsory acquisition powers may be exercised unless and until security for the compensation due for the exercise of such powers is in place. An article to this effect has previously been included in other development consent orders particularly those promoted by special purpose vehicles set up solely to undertake the development who have few assets of their own. For example, article 7 of the Swansea Bay Tidal Generating Station Order 2015 provides that the undertaker under that DCO may not exercise the powers of compulsory purchase until a set security to cover the liabilities of doing so has been provided and that the Local Planning Authority has approved that security in writing. The IACC submit that a similar provision should be added in this case to protect those subject to the compulsory powers sought.

Article 77

IACC notes the amendment that service of notices must be in English and Welsh and welcomes that amendment.

Schedule 1; other associated development; Item p)

The restriction on the scope of item p) is noted. The IACC further notes that this is stated to be in response to its submissions following the first DCO hearing. IACC does not accept that this amendment addresses its concerns. In particular, the concerns are set out at the second DCO hearing and in the submissions following that [REP4-034] that the inclusion of the word 'expedient' introduces considerable doubt, and that the scope of this provision allows for the accumulation of incremental changes which while individually minor may become major.

Schedule 3 requirements

Requirement PW7 Wylfa Newydd CoCP and schemes, Sub paragraph 2

IACC does not accept that there is a good reason for excluding the requirement of a traffic incident management scheme for the undertaking of Work 12. The undertaking of Work 12 will require HGV movements to site and the need for a traffic incident management scheme is as applicable to that as any other works.

Requirement WN9 Final landscape and habitat scheme

IACC notes that the majority of changes sought have been made to this requirement. However the Council notes that the replacement obligation

only applies for a period of 5 years whereas the IACC continues to consider that 10 years is more appropriate for trees.

Requirement WN11 Landscape and Habitat Management Schemes

The IACC notes that some but not all of its requested changes to this requirement have been incorporated. In particular, IACC continues to believe that items need to be added to the list in WN11(2) as set out in its response to written questions (REP2-153 question 4.0.69).

Requirement WN12 Notable Wildlife Enhancement Areas, WN13 reptile receptor sites and WN14 great crested newt receptor sites

The IACC welcomes the amendments to these requirements and is now content with the timing triggers in these.

New requirement WNA and WNB phased construction, lighting and drainage plans

With regard to the phased construction drainage plan, the IACC welcomes the inclusion of the new requirement however considers that it should be noted in this requirement that the standard to be achieved in relation to flooding should be set out in the body of this requirement. As set out in the IACC summary of submissions in Issue Specific Hearing 2. Biodiversity. 11th January, 2019 [REP4-034] the IACC considers the appropriate level to be achieved to be that there should be no increase in flood risk on any property including the third party property currently at risk.

Requirements general: decommissioning strategies

IACC has a concern with the wording of the decommissioning strategies as currently set out for the logistics centre and the Dalar Hir Park and Ride. The concern relates to the possibility that should a plan be submitted in compliance within the wording of restriction but not approved and works therefore cannot be carried out that no resubmission of an amended plan is required.

For Dalar Hir under requirement PR6 this scheme must be submitted to IACC by a set date however if it is refused and amended scheme it does not require to be resubmitted within a set period of time. The wording of requirement LC7 creates the same issue.

IACC considers that the requirements should make it clear where the plan cannot be approved, an amended plan has to be resubmitted within a period no greater than 3 months where no additional and environmental information is required and 6 months if additional and environmental is required.

IACC welcomes the amendments to requirement OH4 boundary treatment design which addresses its concerns. Similarly the requirement made to requirement OH8 landscape detailed design addresses the IACC's point

on triggers and is welcomed. It is however noted that the IACC's general comments in its written representation REP2-218 at 7.4 restoration and aftercare do not appear to have been addressed.

Schedule 14 land of which only temporary possession may be taken

The IACC notes the considerable amends to the schedule which it will consider as part of its response on compulsory acquisition in general.

1 Schedule 15 Protective Provisions

2

The IACC notes the insertion of protected provisions in the favour of highway authorities in general and of it in particular. The IACC welcomes the inclusion of these protective provisions but notes that the version submitted has not yet been subject to amendment through negotiation by the IACC. The IACC has considered these protective provisions in details and made numerous proposed amendments. It will provide these to Horizon at the earliest opportunity. The IACC is hopeful that agreement of these protective provisions will allow it to remove the vast majority of its objections to compulsory acquisition.

Schedule 19 Procedure for approvals, consents and appeals

The IACC notes the insertion of new sub paragraph 14 requiring an indicative milestone schedule. The IACC considers that this would be of assistance.

On these IACC notes that the fees set out may now be amended in line with any amendments to the Town And Country Planning Act (Fees for applications, deemed applications, requests and site visits) (England) Regulations 2017. It is noted that this development is in Wales and any increases in fees to which this is linked should reflect increases in the Welsh fees. Further the IACC continues to object to the level of fee as being inappropriately low for the level of complexity and volume of work which will be required to discharge the requirements of this DCO.

The IACCs overall position on fees position remains as set out in previous submissions in particular section 8.4 of its written representation REP2-218.

PART 2 - IACC COMMENTS ON THE UPDATED EXPLANATORY MEMORANDUM

2.1 The IACC considers that the updates to the explanatory memorandum appropriately reflect the changes made to the DCO. The IACC does not wish to make any further comment on those changes as it considers they follow the changes to the DCO and the objections to those changes have been set out in the appropriate section of the submission.

PART 3 - IACC COMMENTS ON HORIZON'S OVERVIEW NOTE OF REVISED DRAFT DCO SECTION 106 AGREEMENT DATED 23 JANUARY 2019

- 3.1 The IACC wishes to make only brief comments on this document as the section 106 drafting is currently evolving and the IACC considers that while good progress has been made on this matter, it is not yet finalised.
- 3.2 Overall the update paper is agreed to be an accurate reflection of progress between the parties. IACC makes the following remitted comments.
- 3.3 In paragraph 1.2.1 in the reference to contingency funding, the IACC notes that this only applies in most cases there are a few elements where reference to engagement groups are still being discussed. The IACC considers that matters are capable of resolution.
- 3.4 In section 1.2.6 IACC notes that it can only agree to use a reasonable endeavours to ensure that third parties in during into Deeds of Covenant and therefore that this obligation cannot be absolute. This has not however considered to be a fundamental issue or a problem to the progression of the section 106.
- 3.5 In section 1.3, and in particular 1.3.1, it should be noted that the key changes being referred to in this section are those proposed by HNP and that all of these changes are not necessarily yet agreed.
- 3.6 IACC notes the list set out in part 1.4 (anticipated key areas for future negotiation). The IACC has proposed amendments to each schedule. None are yet agreed but significant progress is being made.

PART 4 – IACC COMMENTS ON THE COMPULSORY ACQUISITION OBJECTION SCHEDULE

- 4.1 The IACC notes that it does not appear to be included in this schedule: the IACC has objected and continues to object to the granting of compulsory acquisition powers and powers of temporary possession over its land, in particular operational public highway. For clarity, the IACCs current positions on objections are noted below.

Plots where there is no objection / any holding objection made is withdrawn

Site	Plots
Main	14, 114, 138, 140, 141 144, 145, 148, 151 to 167 inclusive, 174 to 179 inclusive
Parc Cybi	204, 206, 208, 211, 214
Highways 3	568
Highways 7	733, 734, 735, 742

The IACC is content to remove its objection on Plots 114,138,141 and 148 on the main site having received from the Applicant an explanation of how

the details of the public rights of way to be reinstated having been lost reduced the acquisition of these plots is to be controlled. The IACC is satisfied that the Landscape Habitat Management Strategy suitably sets out the minimum standard of the new public rights of way to be in place following construction.

- 4.2 Plot 568 in highways 3 includes the carriageway but excludes the highways interest; IACC have asked for clarification that the intention of this will be occupied only after it has been stopped up. The Applicant has confirmed that it only intends to exercise its powers of temporary possession post stopping up. IACC is therefore content with this position as advised and will remove its objection on this plot.

(a) **Plots in operational highway not being stopped up, Plots in highway to be stopped up where an objection to all compulsory acquisition and temporary possession is maintained**

Site	Plots
Main	50, 51, 52, 53, 54, 55, 56, 105, 142, 143, 168 to 173 inclusive,
Dalar Hir	300, 301, 302, 305, 306, 307, 309, 311, 316 to 326 inclusive, 328
Parc Cybi	202
Highways 1	400 to 407 inclusive, 410, 411, 413 to 418 inclusive, 437 to 442 inclusive
Highways 3	501 to 508 inclusive, 511 to 515 inclusive, 533 to 549 inclusive, 563 to 568 inclusive, 570 to 573 inclusive
Highways 5	All IACC plots
Highways 7	700, 708, 709, 710, 711, 712, 713, 725, 726, 728, 729, 730, 731, 736, 737, 738, 739, 740, 741

The IACC maintains an objection to the temporary possession or acquisition of all of these plots unless and until the agreement of satisfactory protective provisions can be reached. The IACC notes that it has been provided with draft protective provisions by the applicant and it is endearing to progress those.

Plots 524 and 525 in Highways section 3

These plots contain a sewage tank which serves council housing owned by the Council's housing service. The IACC has been investigating whether or not this sewage tank remains operational. It is understood that Horizon may have previously been advised that they were not however that cannot be confirmed at this stage. The IACC therefore maintains its objection to the compulsory acquisition of these plots until the status of the use of the sewage tank can be confirmed. The IACC is endeavouring to resolve this issue in short course and ahead of the compulsory acquisition hearing in March.

- 4.3 The IACC has raised a number of queries on compulsory acquisition with Horizon and it is possible that the Council's objection on some other plots may be able to be withdrawn if those queries can be resolved. At this time an objection is maintained to all of the plots in this section.

(b) **Plots 108 and 109 on the main site relating to Fisherman's carpark**

IACC has requested further clarification from the Applicant on the proposals for the re-opening of this carpark. Horizon has advised that it will be producing new drawings which will be submitted to the Examination addressing this. Horizon has not however advised what proposals it makes to replace the lease of this car park currently granted to the Council which is subject to compulsory acquisition. The Council has not been advised what the status of this carpark will be: if it will be public, if the Council may lease it and who will be maintaining it. This is unacceptable. Horizon requires to clarify its proposals beyond simply stating that a carpark will be provided.

Plot 304 Dalar Hir

The IACC does not consider that this plot is part of its highway. Having discussed this plot with Horizon it is understood that they consider that IACC as highway authority may be the occupier of this plot: the IACC as highway authority confirms that it does not consider itself to be occupier of this plot.

Plot 324 at Dalar Hir

This plot currently forms a lay-by on the public highway which will be closed as part of the proposals to form and use the park and ride site. The IACC has requested clarification from Horizon as whether this lay-by will be reinstated following construction of Dalar Hir. Horizon has advised that the plot would revert back to public highway as part of the restoration following construction however that does not answer the question that IACC have proposed. IACC would be grateful if Horizon could advise whether or not the physical works to return this area to use as a layby will be carried out, this was not a question concerning legal status.

Plot 500, 732 and 743 in highways 3 and 4

The IACC as lead local flood authority wish to review the protective provisions for drainage in order to see if they can suitably address the concerns and allow objections to the compulsory acquisition of these plots to be withdrawn. As the discussion on the protective provisions is ongoing the objection cannot currently be withdrawn. It is noted that at present the protective provisions are generally drafted to protect the highway authority and IACC requires to consider whether or not that is sufficient to address its concerns as lead local flood authority as well or whether the provisions require a further amendment.

Plot 600 highways 5

The IACC let this plot for agricultural use and have some concerns that acquisition will interfere the tenants larger use. The applicant has advised that it is seeking a class 3 temporary possession interest in order to stock pile material to keep lorry movements to a minimum and aid the construction program. The objection is maintained to this plot while the IACC try to resolve the impact on the tenants' interest however, the Council advise that they are seeking to resolve the issue on this plot.

IACC COMMENTS ON PHASING STRATEGY

The IACC notes the pre delivery restriction on the Logistics Centre at Parc Cybi related to the number of HGV movements which may take place on the A5025. IACC notes that in this and the A5025 off-line highway improvements and the marine off-loading facilities restrictions, the maximum number of additional HGV vehicle movement set is 44 HGV two-way movements per hour, 320 HGV two-way movements per day, and 5000 HGV two-way movements per month . As set out at the issue specific hearing on the 8 January 2019 the IACC considers that an appropriate daily cap for HGV movements prior to the opening of the off-line works is a maximum 40% increase above baseline HGV flows. When considering a HGV baseline of 225 HGVs in the year 2020, a 40% cap would allow approximately 100 additional HGV two-way movements per day. The IACC therefore does not accept the cap proposed by Horizon which will allow an additional 320 HGV two-way movements per day.

On the delivery of the site campus, the IACC does not accept that the changes to the phasing strategy address its concerns and maintains its position as set out at deadline 4 REP4-034.

On the table 2.2 definition of triggers, the IACC does not accept the changes made address its concerns and maintains its previous position.

APPENDIX F

CODE OF CONSTRUCTION PRACTICE (CoCPs) AND CODE OF OPERATIONAL PRACTICE (CoOP)

The IACC provides the following comments by way of update on its response to the Revision 3.0 of the Codes of Construction Practice (CoCP) and Code of Operational Practice (CoOP) submitted by HNP at Deadline 5. "CoCP" is intended here to refer to the sub-codes and CoOP.

It is not possible to provide a comprehensive position statement on which parts of the CoCPs are now satisfactory and those which require further detail due to a combination of:

- there being only one week between Deadline 5 and Deadline 6;
- within the period between Deadline 5 and Deadline 6, IACC officers attended the Accompanied Site Visits; and
- because the subject matter of many of the changes requires technical review and liaison with other regulators, such as NRW, who are operating under the same time constraints.

Consideration of the new material contained in Revision 3.0 of the CoCPs must involve regard to those matters which have given concern from arising from the CoCPs at Revision 1.0/ Revision 2.0, not all of which have been addressed by changes at Revision 3.0.

The concerns which IACC and other stakeholders have expressed about the level of detail in the CoCPs is documented in written representations and in the notes of the Issue Specific Hearings of January 2018. The following comments address the new material submitted by HNP at Deadline 5, however a further analysis is needed of how many previously expressed concerns remain notwithstanding this additional material.

In respect of the Revision 3.0 material submitted at Deadline 5, IACC's principal observations are that:

- there is a wide range of additional detail on specific areas that must be subject to expert review before comment can be made on its adequacy.

By way of examples only:

- o the details submitted now for the revised local noise monitoring scheme (Wylfa Newydd CoCP Doc 8.6, para 8.3.2) and the trigger levels for particulate emission responses (Main Site sub-CoCP Doc 8.7, para 7.6.42) require technical assessment that cannot be completed prior to Deadline 6.
- In other areas the continuing lack of detail is more easily identified. By way of example:
 - o References to the Environmental Clerk of Works and Environment Management Team (Wylfa Newydd CoCP Doc 8.6, paras 4.1.3 and 11.2.2) appear to be aimed at answering concerns expressed in the ISH that effective ecological protection had not been demonstrated.

The additional material now supplied amounts only to an assertion that the ECoW would be supported by a team and would be allowed to suspend works but goes no further in providing enforceable detail as to that team size, seniority in relation to other HNP staff and contractors, or the manner by which power to suspend works would be managed in practice or evidenced to IACC or other interested parties.

- References to a Site Waste Management Plans (Wylfa Newydd CoCP Doc 8.6, para 9.3.2) fails to provide the level of engagement needed to ensure meaningful review and testing by IACC to achieve sustainable waste management and waste minimisation, rather than simply reporting on the steps that are proposed.
- Some material is likely to be able to be agreed as adequate, such as:
 - Aspect of the revised archaeological mitigation steps, particularly the principles of mitigation proposed should be able to be agreed, subject to any consequential considerations on matters still in issue (Main Site sub-CoCP Doc 8.7, para 12.1, Off Site Facilities sub-CoCP Doc 8.9 para 12.2 and A5025 sub-CoCP Doc 8.12 para 12.1)

IACC will be in a position to provide more comment within the forthcoming examination hearings on the CoCPs and will continue to engage with HNP and other stakeholders either to identify additional detail still required pre-approval of the DCO or, alternatively, the minimum areas that will need to be subject to further submission and approval after confirmation of the DCO.

LANDSCAPE AND HABITAT MANAGEMENT STRATEGY (LHMS)

The Landscape and Habitat Management Strategy (LHMS) is a significant document that was to be submitted at Deadline 5. However it was not accessible to IACC until late on Wednesday 13 February, when it was uploaded to HNP Collaboration Site. It will not be possible to provide any meaningful commentary on this detailed submission at Deadline 6, however IACC will continue to engage with HNP upon it in advance of the forthcoming Issue Specific Hearings.

APPENDIX G

IACC review of Phasing Strategy Revision 1.0

COMMENTS FORM FOR REVIEW OF STAKEHOLDER						
DB UNIQUE ID#					Revision:	1.0
Title:		Phasing Strategy			Author:	
Protective Marking:		HORIZON COMMERCIAL			Received for review on:	
Stakeholder		Isle of Anglesey County Council			Review required by:	
Review Stage // Comment#	Source Initials	Date	Page/ Paragraph	Reviewer's Comment	Author's Response	Change to Document
			1.1.2	The Phasing Strategy should include a requirement for the undertaker to notify the LPA of the commencement and completion of each Phase.		
			1.1.10. 1.1.11 and 1.1.12	These important paragraphs which confirms the purpose of the Phasing Strategy and how the Strategy should be read alongside other control documents have been removed. The IACC considers that these should be reinstated		
			2.2.1	It should be confirmed that the commitments are made to minimise both environmental and socio-economic effects (not only environmental effects as confirmed)		

			Table 2.2 Definition of Triggers	The definition excludes SPC Works, where SPC works commence under the DCO delivery of essential mitigation should also commence to minimise the impact on communities. The triggers should be amended.		
			Figure 2-1	IACC requires confirmation as to whether the construction of Mounds A, B, C, D and E are included in the 'Bulk Earthworks and Excavations' phase. Table 2-1 confirms that the mounds are to be 'delivered prior to the first nuclear construction date for Unit 1'. Figure 2-1 currently confirms that the 'Bulk earthworks and excavations' (which presumably includes the construction of the landscape mounds) as commencing in Yr (beginning of Q2) and completed by Yr 3 (end of Q1). The construction of Units 1 and 2 are shown as commencing in Yr 2 (end of Q2), part way through the bulk earthworks and excavation phase. This contradicts the statement in Table 2-1. Figure 2-1 does not confirm then modifications to the mounds to create their operational mound status will take place. The IACC wishes for the Phasing Strategy to confirm when the mounds (construction mounds and operation mounds) are to be constructed including confirmation of when mitigation planting will be implemented.		

			Page 4 - Fig 2-1 Indicative Construction Timeline	Construction of A5025 Off-Line Highway Improvements to commence Yr1 Q3 - The IACC would seek construction of the Off-Line Highway Improvements to commence immediately post any granting of DCO approval, i.e. Yr1 Q1 and to be completed as soon as reasonably practicable. A restriction on the progression of the works at the main site prior to the opening to traffic of all sections of the offline improvements is required. This is necessary to reflect the ES assessment that 60-80% of bulk deliveries will be via the MOLF not the highway. This restriction is in addition to the HGV cap set out later in the table. This would enable the Off-Line bypasses to become operational sooner than is currently indicated in Fig 2-1 (Indicative Construction Timeline), which promotes the interests and safety of local residents whom currently reside adjacent the A5025 by reducing the period when construction is ongoing but the offline improvements are not available for use. These include residents located at Valley, Llanynghenedl, Llanfachraeth, Llanfaethlu, Llanrhyddlad, Tregele, etc. who will be directly impacted by construction traffic.		
			Page 4 - Fig 2-1 Indicative Construction Timeline	Construction of Logistics Centre at Parc Cybi to commence Yr1 Q3 0- The IACC would seek construction of the Logistics Centre to commence immediately post any granting of DCO approval, i.e. Yr1 Q1. This would enable Horizon to control the frequency and volume of construction traffic movements along the A5025 sooner than is currently indicated in Fig 2-1 (Indicative Construction Timeline).		

			Page 6 - Table 2-1 Key Mitigation Triggers	Horizon do not specify any restriction on the main site build prior to the delivery of the Logistics Centre at Parc Cybi. A restriction on the progression of the works at the main site prior to the opening of the logistics centre is required. This is in addition to the HGV cap set out later in the table. Whilst the Logistics Centre is being constructed, the IACC would expect that adequate management arrangements will be implemented to control the frequency and volume of construction traffic along the A5025 and these should be outline in the relevant certified plan. This is essential to minimise the potential of HGV deliveries occurring during school pick up/drop off times, as well as HGV convoying. Such arrangements would include the early implementation of the proposed deliveries management system which is included within the Code of Construction Practice, employing a Distribution Management Asset Tracking System (DMATS) to track construction vehicles and pre-book delivery slots to the site. This should be included within restriction on the main build prior to the delivery of the Logistics Centre at Parc Cybi and should specify in particular the build stage .		
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			Page 6 - Table 2-1 Key Mitigation Triggers	The IACC have significant concerns with the current HGV Early Years cap proposal, as was highlighted in the Issue Specific Hearing on 8th January 2019. The IACC acknowledges that HGV movements in the early years of the project are partly directly related to constructing essential mitigation for the project, however, in the context of Anglesey and the rural local communities located along the A5025 whom will be directly impacted by construction traffic, the IACC believes that any increase in HGV traffic will have a detrimental impact. The Authority considers a maximum 40% increase in HGV traffic above baseline flows (baseline to be agreed/confirmed) along the A5025 would be more appropriate prior to the opening of the Off-Line bypasses, which equates to an approximate increase of 50no. daily HGV movements (each way) above baseline flows in the year 2021. This would reduce such adverse effects as community severance, noise, air quality, vibration and road safety. An appropriate cap as referred to above would be in accordance with the Well-being Goals, for “a healthier Wales”, a “more equal Wales”, a “Wales of cohesive communities” and “a globally responsible Wales”.		
			Page 6 - Table 2-1 Key Mitigation Triggers	During recent Transport workshop meetings between Horizon and IACC, discussions have been held on introducing improvements/measures through Llanfachraeth, funded by Horizon, to mitigate against the significant increase in HGV traffic. These proposed measures/improvements include resurfacing, adjusting ironworks, etc.		

				The IACC welcomes this and seeks to continue discussions on potential mitigation measures, but by no means does agreeing to these measures suggest that the IACC accepts the HGV caps currently proposed.		
			Table 2-1 Key Mitigation Triggers	The changes do not address the Council's concerns and the phasing provisions for the TWA are unacceptable. The construction of the second 1,000 beds, and of the final 2,000 beds, would occur later than the more incremental approach in the original Horizon proposal to built TWA in 500 bed increments The delivery stages are too late: • The first 1,000 beds would be complete in early Y4Q4, in which the non-home based workforce will exceed 2,200 • The second 1,000 beds would be complete in early Y6Q2, in which the non-home based workforce will exceed 4,200 • The final 2,000 beds would be complete in early Y7Q2, in which the non-home based workforce will exceed 6,700 This will result in additional beds being required from the private sector in Y5Q4 and Y6Q1, and in Y6Q3, Y6Q4 and Y7Q1. Please refer to the attached note which provided further detailed comments in relation to TWA phasing.		
			Table 2.2 definition of triggers	The definition of the 'trigger' for the construction of the final phase of 2,000 beds is unacceptable as the definition of peak workforce is unacceptable. 9,000 has been assessed as a worst case but the workforce is only expected to reach 8,500; if that is correct then the trigger specified will never be reached. Any peak workforce trigger should be set by reference to the building programme quarter where the workforce is expected to first exceed [7,500]. Please refer to the attached		

				note which provided further detailed comments in relation to TWA phasing.		
COMMENTS FORM FOR REVIEW OF CONTRACTOR DOCUMENT						
Status:	[Approved] / [Accepted] / [Accepted with comments] / [Rejected] (delete as appropriate) For 'Accepted' status only: [This submission will require Horizon 'Approval' in due course; 'Accepted' is an interim status of no objection in order to allow works to proceed.] or [This submission will not require subsequent Horizon 'Approval'.] (delete as appropriate) For 'Endorsing' reviewers' comments by Head of Function: [Endorsed] / [Not endorsed]					
Name, role:						
Signature:						
Date:						

APPENDIX H

IACC comments on Workforce Management Strategy

COMMENTS FORM FOR REVIEW OF STAKEHOLDER							
DB UNIQUE ID#						Revision:	
Title:		Workforce Management Strategy				Author:	
Protective Marking:		HORIZON COMMERCIAL				Received for review on:	
Stakeholder						Review required by:	
Review Stage // Comment#	Source Initials	Date	Page/ Paragraph	Reviewer's Comment		Author's Response	Change to Document
			Exec Summary Para 1	The Workforce Management Strategy should outline what measures will be implemented to manage and prevent impacts in addition to mitigating impacts that may occur. The Strategy also needs to be expanded to include a requirement for Safe Recruitment and Management of that workforce. The IACC seek assurances from Horizon that their workforce will be appropriately managed through the provision of adequacy facilities and services in the site campus, mitigation to provide these services in the communities (through s.106) and through appropriate distribution of workers through the WAMS.			

			General	Safe Workforce is a core element of an organisation's safeguarding approach. The Strategy needs to provide assurances in terms of a policy frameworks to regulate workforce conduct: what means they will use to place an expectation that their contractors have similar arrangements in place thus enforcing a similar standard of conduct across the whole workforce engaged in the Wylfa project. Horizon must show leadership in this area to prevent, manage and mitigate risks by, amongst others, institutionalising safeguarding impact assessments in the bidding processes. IACC would expect the strategy to provide detailed information in relation to; a) Safer Recruitment Policies and Processes b) Safeguarding Champion/Coordinator appointed c) Mandatory Training for the Workforce and d) Safeguarding Code of Conduct for the Workforce. e) Institutionalising safeguarding impact assessments in the bidding processes		
			1.1.3	IACC suggests amending the wording to ' ... preventing, managing the workforce, then mitigate if necessary ... ' Compensation is required where impacts cannot be minimised. There needs to be a recognition that exploitation of adults and children cannot be solely mitigated by managing workforce. It's a population matter not solely a workforce matter.		
			1.1.3	IACC suggests the following wording ' ... minimised as far as possible and compensate where they cannot mitigate.'		
			1.1.4 (bullet point 1)	Supply Chain Charter - This should at least be Horizon signing up and following through on this commitment. IACC recommends that HNP refers and benchmarks the project against the Welsh Government 'Code of Ethical Employment in Supply Chains & Institutionalising safeguarding impact assessments' in the bidding processes https://gov.wales/topics/improvingervices/bettervfm/code-of-practice/?lang=en		
			1.1.4 (bullet point 4)	Code of Conduct - This should at least be Horizon signing up and following through on this commitment - IACC recommends that HNP refers and benchmarks the project against the WG 'Code of Ethical Employment in Supply Chains & Institutionalising safeguarding impact assessments' in the bidding processes this must be equal to a) Safer Recruitment Policies and Processes b) Safeguarding Champion/Coordinator appointed c) Mandatory Training for the Workforce and d) Safeguarding Code of Conduct for the Workforce		

			1.1.4 (bullet point 8)	This needs to include an expectation that Horizon must engage with the local communities to ensure that the expectations of their workforce is clearly communicated and to hear directly about the concerns of the communities.		
			1.2.1	There is nothing in this document around ethical employment issues – IACC recommends that HNP refers and benchmarks the project against the WG 'Code of Ethical Employment in Supply Chains & Institutionalising safeguarding impact assessments – how to ensure fair employment and avoid false self-employment.		
			2.2 bullet point 1	This is not robust enough. Safeguarding matters needs to be built into the whole supply chain – from procurement: to contact: monitoring: assessing impact.		
			2.2 bullet point 3	How will feedback be collated ? Is there a dedicated number / email ?		
			2.2 bullet point 4	What is meant by Reacting ? They need a framework of policies and procedures which detail how the work force is managed and any performance issues – inside or outside work – are managed. What are the monitoring methods?		
			2.2 bullet point 5	In terms of safeguarding, the agencies listed would not be the general go to agencies. Agencies identified should consist of the Local Authority and the Police as the Agencies authorised to investigate allegations of harm and in the case of the Police criminal matters.		
			2.2 bullet point 6	In terms of safeguarding more is required than proactive communication. Need to develop the range and capacity of programs and systems to promote well-being in Ynys Mon and need to provide education and support programs on a preventative basis in the communities that are mostly affected.		
			2.2 bullet point 7	(first sentence) 'Taking reasonable steps' needs to be defined (second sentence) Safeguarding requires more than dialogue - We have made it clear in the IACC LIR what some of those measures are – and it is indicative that even at this stage there is no recognition of these matter by Horizon. (fourth sentence) IACC suggests amending the wording to '... and reviewed at least annually.' (fifth sentence) IACC suggests amending the wording to ' ... ensure that all of Horizon and the supply chain staff ...' The example referred to is a very weak example of Safeguarding training		
			2.2 bullet point 9 (first sentence)	This is the critical point for effectively managing the workforce. The quality and availability of on-site facilities (and the cost of using them – e.g. price of alcohol, food, etc.) will determine whether the workers stay on-site of use local facilities and services. Need firmer commitment from Horizon on this.		

			2.2 bullet point 9 (second sentence)	This contradicts what Horizon have said in other documents – i.e. the Site Campus will only be available to the residents of the campus. This will not work in terms of security, it has not been assessed in terms of capacity etc. and should be deleted.		
			2.3.1	IACC suggests amending the wording to ' ... require its supply chain and sub-contractors to adhere ... ' This should at least be Horizon signing up and following through on this commitment - IACC recommends that HNP refers and benchmarks the project against the WG 'Code of Ethical Employment in Supply Chains & Institutionalising safeguarding impact assessments		
			2.3.1 bullet point 3	How will standards of behaviors be effectively communicated ? Code of Conduct - This should at least be Horizon signing up and following through on this commitment - IACC recommends that HNP refers and benchmarks the project against the WG 'Code of Ethical Employment in Supply Chains & Institutionalising safeguarding impact assessments this must be equal to a) Safer Recruitment Policies and Processes b) Safeguarding Champion/Coordinator appointed c) Mandatory Training for the Workforce and d) Safeguarding Code of Conduct for the Workforce		
			2.3.1 bullet point 13	IACC suggest amending the wording to ' ... developed in consultation with Horizon and the IACC ... '		
			2.3.1 bullet point 13 (first bullet)	There is no direct reference to Safeguarding training		
			2.3.1 bullet point 14	The example referred to is a repeat and is a very weak example of Safeguarding training. A better example would be suppliers using exploited labour.		
			2.4.4 bullet point 1	IACC suggest amending the wording to 'Workers are expected to discharge their functions reasonably and according to the law.' Horizon should also list the principles which their workforce should adhere to e.g. Honesty, Integrity Respect, Accountability		

		2.4.4 bullet point 5	IACC suggests removing the words 'If appropriate' and 'Where practicable'. Workers must adhere to construction vehicle routes and this includes construction workers sticking to 'A' class roads and avoiding 'B' class roads, 'C' class roads and unclassified roads.		
		2.4.4 bullet point 8	How will any personnel found to be parking outside designated areas be disciplined ?		
		2.4.4 bullet point 11 (third bullet)	How often will drug and alcohol testing and related searches be undertaken during work hours ? Anecdotal evidence from Hinkley suggests that workers know which days / shifts are targeted for 'random' drug and alcohol tests.		
		2.4.4 bullet point 13	IACC suggest amending the wording to '... caused to property or people within the community.'		
		2.4.4 bullet point 16	Need to add any behaviors that poses a risk to the emotional, sexual, physical, financial wellbeing of individuals		
		2.4.4 bullet point 17	Is it possible for landlords / tourism providers to report unsatisfactory behavior to Horizon / WAMS?		
		2.4.4 bullet point 19	The Workforce Management Strategy provides approaches to minimize effects from worker pressure on designated sites and key species through directing off-site access south through the construction site, meaning access to Trwyn Pencarreg would be a round trip of over 12km; information on designated sites and the key species' sensitivities, together with signage during key sensitive breeding periods; and, monitoring of the areas by the Ecological Clerk of Works ("ECOW") during key sensitive breeding periods. A revised version of the Workforce Management Strategy will be submitted at Deadline 4 (17 January 2019) The updated version of the WMS refers at paragraph 2.4.4 to some of the principles by which the workforce will be governed within their terms of employment and the Code of Conduct. Bullet number 19 of that list refers to sensitive ecological receptors and the need for personnel to avoid damage or interference to these sensitive areas. However the detail in the updated WMS does not include the level of detail that is required as confirmed by HNP in its response to National Trust.		

			3.1.1	Code of Conduct - This should at least be Horizon signing up and following through on this commitment - IACC recommends that HNP refers and benchmarks the project against the WG 'Code of Ethical Employment in Supply Chains & Institutionalising safeguarding impact assessments. This must be equal to a) Safer Recruitment Policies and Processes b) Safeguarding Champion/Coordinator appointed c) Mandatory Training for the Workforce and d) Safeguarding Code of Conduct for the Workforce		
			3.2.1 (final sentence)	It is noted that reporting will be through the Health and Well Being Engagement Group, should this be 'the relevant Engagement Group'? i.e. could be a housing issue, transport issue etc.		
			Appendix 1	The Code of Conduct is considered to be weak. IACC refers HNP to its Code of Conduct. http://www.anglesey.gov.uk/Journals/n/k/w/5.2-Officers-Code-of-Conduct.pdf There are clear omissions from the Code of Conduct included in Appendix 1 including but not limited to; - Your duties to the employer - Your duties to the public - Duty of care for safeguarding, wellbeing, health and safety - Raising concerns and whistleblowing policy - Managing relationships in work - Corruption - Awarding contracts		
			Appendix 1 (page 15, bullet point 5 in second list)	Deliberate damage to property - Should this also include possessions, or is this defined under property?		
			Appendix 1 (page 15, bullet point 10)	No form of bullying or harassment should be tolerated. IACC suggest removing the word 'serious'		

			in second list)		
COMMENTS FORM FOR REVIEW OF CONTRACTOR DOCUMENT					
Status:	[Approved] / [Accepted] / [Accepted with comments] / [Rejected] (delete as appropriate) For 'Accepted' status only: [This submission will require Horizon 'Approval' in due course; 'Accepted' is an interim status of no objection in order to allow works to proceed.] or [This submission will not require subsequent Horizon 'Approval'.] (delete as appropriate) For 'Endorsing' reviewers' comments by Head of Function: [Endorsed] / [Not endorsed]				
Name, role:					
Signature:					
Date:					

APPENDIX I

IACC comments on Workforce Management Strategy

COMMENTS FORM FOR REVIEW OF STAKEHOLDER							
DB UNIQUE ID#						Revision:	
Title:		Workforce Management Strategy				Author:	
Protective Marking:		HORIZON COMMERCIAL				Received for review on:	
Stakeholder						Review required by:	
Review Stage // Comment#	Source Initials	Date	Page/ Paragraph	Reviewer's Comment		Author's Response	Change to Document
			Exec Summary Para 1	The Workforce Management Strategy should outline what measures will be implemented to manage and prevent impacts in addition to mitigating impacts that may occur. The Strategy also needs to be expanded to include a requirement for Safe Recruitment and Management of that workforce. The IACC seek assurances from Horizon that their workforce will be appropriately managed through the provision of adequacy facilities and services in the site campus, mitigation to provide these services in the communities (through s.106) and through appropriate distribution of workers through the WAMS.			

			General	Safe Workforce is a core element of an organisation's safeguarding approach. The Strategy needs to provide assurances in terms of a policy frameworks to regulate workforce conduct: what means they will use to place an expectation that their contractors have similar arrangements in place thus enforcing a similar standard of conduct across the whole workforce engaged in the Wylfa project. Horizon must show leadership in this area to prevent, manage and mitigate risks by, amongst others, institutionalising safeguarding impact assessments in the bidding processes. IACC would expect the strategy to provide detailed information in relation to; a) Safer Recruitment Policies and Processes b) Safeguarding Champion/Coordinator appointed c) Mandatory Training for the Workforce and d) Safeguarding Code of Conduct for the Workforce. e) Institutionalising safeguarding impact assessments in the bidding processes		
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			2.2 bullet point 1	This is not robust enough. Safeguarding matters needs to be built into the whole supply chain – from procurement: to contract: monitoring: assessing impact.		
			2.2 bullet point 3	The manner in which feedback will be collated should be made specific. Will there be a dedicated number / email ?		
			2.2 bullet point 4	What is meant by Reacting ? They need a framework of policies and procedures which detail how the work force is managed and any performance issues – inside or outside work – are managed. Monitoring methods need to be made specific.		
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			2.3.1	IACC suggests amending the wording to ' ... require its supply chain and sub-contractors to adhere ... ' This should at least be Horizon signing up and following through on this commitment - IACC recommends that HNP refers and benchmarks the project against the WG 'Code of Ethical Employment in Supply Chains & Institutionalising safeguarding impact assessments		
			2.3.1 bullet point 3	How will standards of behaviors be effectively communicated ? Code of Conduct - This should at least be Horizon signing up and following through on this commitment - IACC recommends that HNP refers and benchmarks the project against the WG 'Code of Ethical Employment in Supply Chains & Institutionalising safeguarding impact assessments this must be equal to a) Safer Recruitment Policies and Processes b) Safeguarding Champion/Coordinator appointed c) Mandatory Training for the Workforce and d) Safeguarding Code of Conduct for the Workforce		
			2.3.1 bullet point 13	IACC suggest amending the wording to ' ... developed in consultation with Horizon and the IACC ... '		
			2.3.1 bullet point 13 (first bullet)	There is no direct reference to Safeguarding training		
			2.3.1 bullet point 14	The example referred to is a repeat and is a very weak example of Safeguarding training. A better example would be suppliers using exploited labour.		
			2.4.4 bullet point 1	IACC suggest amending the wording to 'Workers are expected to discharge their functions reasonably and according to the law.' Horizon should also list the principles which their workforce should adhere to e.g. Honesty, Integrity Respect, Accountability		

		2.4.4 bullet point 5	IACC suggests removing the words 'If appropriate' and 'Where practicable'. Workers must adhere to construction vehicle routes and this includes construction workers sticking to 'A' class roads and avoiding 'B' class roads, 'C' class roads and unclassified roads.		
		2.4.4 bullet point 8	How will any personnel found to be parking outside designated areas be disciplined ?		
		2.4.4 bullet point 11 (third bullet)	How often will drug and alcohol testing and related searches be undertaken during work hours ? Anecdotal evidence from Hinkley suggests that workers know which days / shifts are targeted for 'random' drug and alcohol tests.		
		2.4.4 bullet point 13	IACC suggest amending the wording to '... caused to property or people within the community.'		
		2.4.4 bullet point 16	There is a need to add that any behaviours that poses a risk to the emotional, sexual, physical, financial wellbeing of individuals		
		2.4.4 bullet point 17	Is it possible for landlords / tourism providers to report unsatisfactory behaviour to Horizon / WAMS?		
		2.4.4 bullet point 19	The Workforce Management Strategy provides approaches to minimize effects from worker pressure on designated sites and key species through directing off-site access south through the construction site, meaning access to Trwyn Pencarreg would be a round trip of over 12km; information on designated sites and the key species' sensitivities, together with signage during key sensitive breeding periods; and, monitoring of the areas by the Ecological Clerk of Works ("ECOW") during key sensitive breeding periods. A revised version of the Workforce Management Strategy will be submitted at Deadline 4 (17 January 2019) The updated version of the WMS refers at paragraph 2.4.4 to some of the principles by which the workforce will be governed within their terms of employment and the Code of Conduct. Bullet number 19 of that list refers to sensitive ecological receptors and the need for personnel to avoid damage or interference to these sensitive areas. However the detail in the updated WMS does not include the level of detail that is required as confirmed by HNP in its response to National Trust.		

			3.1.1	Code of Conduct - This should at least be Horizon signing up and following through on this commitment - IACC recommends that HNP refers and benchmarks the project against the WG 'Code of Ethical Employment in Supply Chains & Institutionalising safeguarding impact assessments. This must be equal to a) Safer Recruitment Policies and Processes b) Safeguarding Champion/Coordinator appointed c) Mandatory Training for the Workforce and d) Safeguarding Code of Conduct for the Workforce		
			3.2.1 (final sentence)	It is noted that reporting will be through the Health and Well Being Engagement Group, should this be 'the relevant Engagement Group'? i.e. could be a housing issue, transport issue etc.		
			Appendix 1	The Code of Conduct is considered to be weak. IACC refers HNP to its Code of Conduct. http://www.anglesey.gov.uk/Journals/n/k/w/5.2-Officers-Code-of-Conduct.pdf There are clear omissions from the Code of Conduct included in Appendix 1 including but not limited to; - Your duties to the employer - Your duties to the public - Duty of care for safeguarding, wellbeing, health and safety - Raising concerns and whistleblowing policy - Managing relationships in work - Corruption - Awarding contracts		
			Appendix 1 (page 15, bullet point 5 in second list)	Deliberate damage to property - Should this also include possessions, unless this is defined under property.		
			Appendix 1 (page 15, bullet point 10)	No form of bullying or harassment should be tolerated. IACC suggest removing the word 'serious'		

			in second list)		
COMMENTS FORM FOR REVIEW OF CONTRACTOR DOCUMENT					
Status:	[Approved] / [Accepted] / [Accepted with comments] / [Rejected] (delete as appropriate) For 'Accepted' status only: [This submission will require Horizon 'Approval' in due course; 'Accepted' is an interim status of no objection in order to allow works to proceed.] or [This submission will not require subsequent Horizon 'Approval'.] (delete as appropriate) For 'Endorsing' reviewers' comments by Head of Function: [Endorsed] / [Not endorsed]				
Name, role:					
Signature:					
Date:					

APPENDIX J

IACC Comments on request by ExA at ASI Day 2 (14.02.19) for information regarding the Rhosgoch site

Summary

- Former Shell Tank Site.
- Site extends to some 82.2 hectares (203.12 acres)
- 5.5 miles from Wylfa (approximately 10 minute drive along A5025)
- Designated as 'reserve employment site' in JLDP (B1, B2 & B8 uses)
- Site owned by Conygar Investment Company since 2015 (previously owned by Anglesey Charitable Trust).
- Previously proposed as sub-station location for offshore wind farm (2GW).
- Part of Horizon proposal in PAC2 for Temporary Workers Accommodation (1,500 bedspaces).
- No significant environmental designations.

History / Background

The former Shell Tank Site was developed in the 1970s as a holding station for the piped transfer of crude oil from the Port of Amlwch to the Stanlow refinery in the Wirral. The site was closed down by Shell in 1990 and transferred into the ownership of the Isle of Anglesey Charitable Trust for the benefit of the local community. The site has been vacant since its closure in the early 1990s.

In 2013, the Rhosgoch site was intended to be the location for the onshore sub-station for the Irish Sea Zone Rhiannon Wind Farm proposed by Celtic Array. Celtic Array was a joint venture between Centrica Renewable Energy Limited and DONG Energy. Celtic Array proposed to develop an offshore wind farm that has a generating capacity of 2.2GW. A 2GW connection agreement was agreed with National Grid with landfall on the Anglesey coast. Celtic Array proposed to underground the transmission cables from the landfall sites to Rhosgoch before connecting to the National Grid (OHL). The 2GW sub-station was proposed at Rhosgoch given its size, natural screening, remoteness, proximity to the coast and crucially, being within 1km to the existing 400kV overhead transmission line.

Celtic Array undertook two rounds of formal pre-application consultations (PAC1 and PAC2), but due to technical difficulties with the sea bed and commercial reasons, decided in July 2014 not to pursue the DCO application and terminated the project. Celtic Array has therefore undertaken detailed environmental surveys of the Rhosgoch Site.

The Rhosgoch site was put up for sale by the Anglesey Charitable Trust in 2015. The site was bought speculatively by Connygar Ltd. The Rhosgoch site was considered as an option for Temporary Workers Accommodation (TWA) by Horizon in their informal 'Project Update' consultation in January 2016 (up to 4,000 bedspaces) and thereafter in their formal PAC2 consultation in October 2016 (1,500 bedspaces). Horizon have undertaken a number of primary ecological and other surveys on the Rhosgoch site and these were included in the PAC2 Preliminary Environmental Information Report (Volume D1).

The Rhosgoch site was considered as a 'top up site' for TWA in PAC2. The majority on the non-home based construction workers would be located at Land & Lakes (3,500), 500 on-site, 200 at Madyn Farm and up to 1,500 at Rhosgoch. However, in PAC3 Horizon's Workforce Accommodation Strategy changed and 4,000 were now proposed on-site with all other sites being discounted.

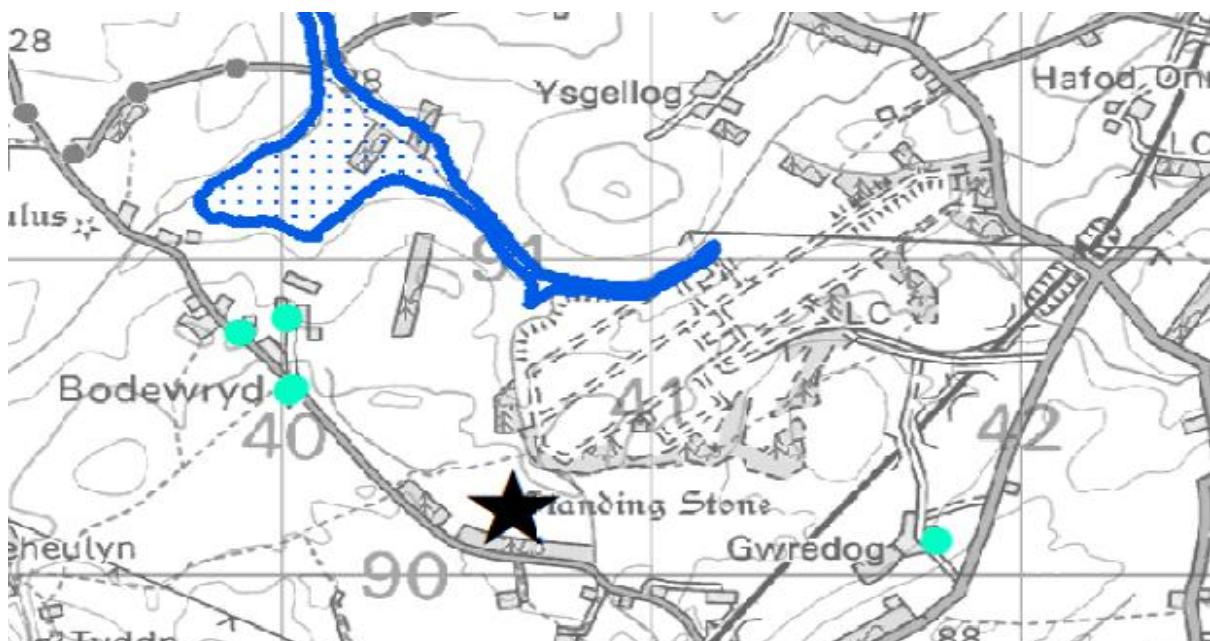
Planning Status

Rhosgoch is allocated in the Gwynedd and Anglesey Joint Local Development Plan (JLDP) 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.

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.

Environmental Designations

The site is in a rural location with the surrounding area comprising mainly pastureland interspersed with isolated farmsteads, cottages and hamlets. The site lies within a Special Landscape Area which covers the majority of Anglesey, inland of the Anglesey Area of Outstanding Natural Beauty (AONB). The site is also within the Amlwch and Environs Landscape Character Area. There is a scheduled ancient monument (a Bronze Age standing stone) located approximately 130m to the south-west of the site. There are few listed buildings in the neighbouring properties (Bodewyrd and Gwredog) however, these are not visible from the Rhosgoch site due to the topography and natural screening. The northern site boundary, which is bounded by the Afon Wygyr, is identified as being at risk of flooding from the watercourse (C2 Floor Risk Zone), although flood extents are limited to a small strip of land adjacent to the watercourse.



(Source: JLDP Constraints Map)

Ponds on the site are known to contain great crested newts, a protected species. The great crested newts were recorded in four out of five ponds on site during surveys undertaken by Horizon in spring 2016.

The former use of the site would have given rise to some land contamination although clean-up activities took place on the cessation of the former use. Initial surveys of the land by Horizon in 2016 suggest that some works will be required to address localised contamination. It is unlikely that large-scale remediation will be required.

The site has no other statutory designations.

Approximately 100m north of the site is the 4.6MW two-turbine Ysgelloog wind farm, which became operational in 2013. These turbines are 92.5 meters to the tip (71m to the hub). This may give rise to noise impacts, which would need to be assessed in relation to any workers accommodation proposed onsite.