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Subject: Wylfa Newydd DCO [EN010007]: Welsh Government Deadline 7 Submission [IP Number: 20011597]
Date: 14 March 2019 17:01:54
Attachments: [image001.png](#)
[19.03.14 Welsh Government Deadline 7 Submission.pdf](#)

Dear Wylfa Newydd Case Team,

Please find attached Welsh Government's Deadline 7 Submission.

Please can you confirm receipt at the earliest opportunity.

Kind regards,

Dan

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Associate
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Eich cyf/Your ref **EN010007**

FAO: Kay Sully
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The Planning Inspectorate
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Bristol
BS1 6PN

14 March 2019

Dear Ms Sully,

EN010007 Wylfa Newydd Nuclear Power Station

Welsh Government (IP Number: 20011597) Deadline 7 Submission – 14 March 2019

1 Introduction

- 1.1.1 The Welsh Ministers (hereafter referred to as Welsh Government) formally registered on 10 August 2018 as an Interested Party to the Wylfa Newydd Nuclear Power Station Development Consent Order (DCO) Application, submitted by Horizon Nuclear Power (hereafter referred to as Horizon).
- 1.1.2 Welsh Government attended and participated in the Issue Specific Hearings (ISH) held in the Trearddur Bay Hotel from Monday 04 March to Friday 08 March 2019.
- 1.1.3 This submission sets out Welsh Government's position following the ISH and responses to the action points published on 12 March 2019.

2 Issue Specific Hearing Action Points (Published 12 March 2019)

04 March 2019 – Wylfa Newydd Development Area

- 2.1.1 Welsh Government note the following actions which have been captured as part of this Deadline 7 submission:
 - **Action Point 20:** Please refer to **Section 3.0** in this submission.
 - **Action Point 21:** Please refer to **Section 3.0** in this submission.
 - **Action Point 27:** Welsh Government do not wish to make any further representations on the consideration of design issues. Welsh Government have previously made representations on the role of the Design Commission for Wales within REP5-080.
 - **Action Point 31:** Please refer to **Section 3.0** in this submission.

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and responding in Welsh will not lead to a delay in responding.

2.1.2 We note that Action Point 22 has been assigned to Welsh Government. We respectfully request that this be amended to ‘the Applicant’. Action Point 22 relates to matters raised by Welsh Government through a pre-hearing note (01 March 2019). This action is now a matter for the Applicant to respond. Welsh Government would welcome the submission of the recently produced Archaeological Summary Reports into the Examination to inform and update the relevant chapters of the Environmental Statement.

05 March 2019 – Land Acquisition

2.1.3 Welsh Government note the following actions which have been captured as part of this Deadline 7 submission:

- **Action Point 17:** Please refer to **Section 4.0** of this submission.
- **Action Point 19:** Please refer to **Appendix E** of this submission.
- **Action Point 20:** The Applicant committed during the ISH in respect of the DCO to delete Article 9(4). Further comments in respect of funding are provided in response to Action Point 19 at **Appendix E** of this submission.

06 March 2019 – Draft DCO Hearing

2.1.4 Welsh Government note the following actions which have been captured as part of this Deadline 7 submission:

- **Action Point 14:** Please refer to **Section 5.0** of this submission.
- **Action Point 15:** Please refer to **Section 6.0** of this submission.
- **Action Point 34:** Please refer to **Section 7.0** of this submission.

2.1.5 We note that Action Points 7, 21, 22, and 23 have been assigned to Welsh Government. We respectfully request that this be amended to ‘the Applicant’. Action Points 21-23 relate to matters raised by Welsh Government through a pre-hearing note (01 March 2019). These actions are now a matter for the Applicant to respond.

07 March 2019 – Other Associated Development

2.1.6 Action Points 8, 12 and 13 all relate to lighting, landscaping and potential impacts on heritage assets of the Logistics Centre. Whilst these actions are not specifically directed at Welsh Government/ Cadw, comments are provided in **Appendix E**.

3 Welsh Government position on heritage and archaeological Matters

Position Update

3.1.1 Prior to the ISH on 04 March 2019, Welsh Government provided a submission to the Examining Authority (01 March 2019) providing an important update regarding archaeological and heritage matters.

3.1.2 Welsh Government highlighted in its 01 March 2019 letter that there were significant concerns relating to the post excavation works for those archaeological investigations already completed, and that there was a risk, based on statements made by Horizon in an earlier meeting, that Horizon may no longer proceed in the reporting, analysis, publication, dissemination and archiving in accordance with the agreed Written Scheme of Investigation and the standards of the Chartered Institute for Archaeologists.

3.1.3 Through email correspondence, Horizon have confirmed (on 8 March 2019) that Horizon are progressing a plan to address the concerns raised in the pre-hearing submission and at the Issue Specific Hearings themselves. This will seek to provide a long-term solution to addressing the archaeology at the Wylfa Newydd site.

3.1.4 Welsh Government understands that further details on Horizon's approach will be provided to Welsh Government this week and that an outline plan will be submitted at Deadline 8 by HNP. Welsh Government has raised concerns with HNP over the timing of the Deadline 8 submission as that is also the deadline for submission of the final form section 106 agreement. As noted below, the Welsh Government considers that a section 106 obligation to secure these commitments is necessary (in the absence of an alternative mechanism being proposed by HNP and agreed with stakeholders). Welsh Government would also expect to see a detailed plan and agreed mechanism for securing this agreed in advance of Deadline 8.

3.1.5 In its 01 March 2019 letter, Welsh Government highlighted how the archaeological works were part of the "project" for EIA purposes and had been included in the environmental assessment for the development applied for. The excavation works have clearly been carried out for the purposes of the project. Welsh Government's position is that unless the full programme of works, including post-excavation assessment, analysis, reporting, publication archiving and dissemination is completed in accordance with then substantial harm will be caused by the project. Without an appropriate commitment, this will represent unmitigated substantial harm as this is mitigation relied upon in the ES. In this regard, HNP REP3-004 paragraph 17.5.13 clearly states:

17.5.13 While the public benefits resulting from the Wylfa Newydd DCO Project would outweigh the harm resulting from their removal, which is required for the construction of the Power Station, in the case of effects on archaeological remains assessed to be of high value (including those heritage assets identified above) it is Horizon's view that through the completion of archaeological investigations (including archaeological excavation) (which have been agreed with Cadw and GAPS and monitored by GAPS in their role as Curator) and the programme of reporting, analysis, publication, dissemination and archiving means that substantial harm to these heritage assets have been avoided

3.1.6 The Welsh Government's position is that a section 106 obligation is necessary and justified to secure the commitments relied upon by the ES to avoid substantial harm from the project. Such obligation must take effect on the date of completion of the section 106 agreement and the agreement should provide that it is enforceable whether or not the DCO is implemented or granted. This is easily achievable through minor changes to standard clauses in the front end of the section 106 agreement. In view of the uncertain future for HNP as a company and current lack of assets, the commitments either need be supported by adequate security for performance (if HNP is to deliver the post excavation scheme) or sufficient up-front funding payable on the date of completion of the agreement to allow Cadw/ GAPS to implement the scheme. The Welsh Government will continue to engage with HNP on this and will proactively consider any alternatives HNP may wish to propose.

Action Point 20 (04 March 2019)

3.1.7 In response to Action Point 20, the following documents have been prepared by Gwynedd Archaeological Planning Service (GAPS) and Cadw:

- Summary plan identifying the location of the three nationally important archaeological sites within the WNDA; and
- Summary plan identifying the location of the three nationally important archaeological sites in relation to the Project Design.

3.1.8 Both documents can be found in **Appendix A**.

Action Point 21 (04 March 2019)

3.1.9 Action Point 21 arising from the WNDA ISH states that WG request inclusion of a requirement in the DCO in respect of excavated archaeological remains. To clarify, as noted above, WG's position at the ISH is that a section 106 obligation is necessary so that this may be enforced from the date of completion of the agreement, whether or not the DCO is granted or implemented. Solicitors representing the Welsh Government and IACC have both made clear to HNP's representatives that they are happy to consider alternative mechanisms that may be proposed by HNP outside the DCO process, however, to date no such alternative mechanism has been proposed and a section 106 obligation is considered necessary for the reasons set out above and to bind the land and successors in title.

3.1.10 The ExA requested that attendees at the ISH set out alternative proposals if the section 106 does not adequately address concerns. In this context, if a suitable mechanism cannot be agreed with HNP and HNP refuses to provide a suitable section 106 commitment on this, then the following could be imposed within the DCO by the Secretary of State:

- A positive obligation in the DCO pursuant to a new article in the DCO requiring the implementation of a defined post excavation scheme, the drafting would need to ensure it is enforceable from the date of the DCO (regardless of whether there is commencement pursuant to the DCO); and
- The obligation would need to demonstrate adequate funding for the scheme or adequate security for performance, including the ability for IACC to enforce the obligation against the land and recover monies. The DCO could replicate the enforcement powers under section 106 of the 1990 Act to the extent necessary.

3.1.11 The above would be less effective than a section 106 commitment as a) the above would be of no effect if the DCO is refused and b) there may be practical difficulties in enforcing the obligation on funding or security for performance in circumstances where the project is not coming forward. Welsh Government will therefore continue to work with HNP to seek to agree a suitable mechanism.

Action Point 31 (04 March 2019)

3.1.12 Horizon has raised that it may not be possible for the Kitchen Garden to be restored in the exact same location at the same height due to safety considerations. Welsh Government raised at the ISH that it had not seen any evidence in support of this and notes that the Kitchen Garden is located outside the security boundary. WG has requested further information from HNP. Whilst Welsh Government / Cadw may be prepared to accept some flexibility should this be justified, we are keen to establish the extent of these potential safety issues and what this could mean in practice for height and location of the restored Kitchen Garden.

3.1.13 Welsh Government also raised at the ISH its desire for the Kitchen Garden to be restored as far as possible from the original materials. Welsh Government consider this should be easily achievable and understand that Horizon is considering the point.

3.1.14 Horizon has agreed that the Kitchen Garden will be excluded from Work 12 which is welcomed by Welsh Government. Welsh Government has requested that a specific financial standing test is satisfied prior to demolition of the Kitchen Garden (or alternative security provided) to back up the restoration and management plan to ensure that the undertaker has sufficient funding/ assets at that time. Further comments are provided on this at **Appendix E** in respect the DCO and draft Article 84.

3.1.15 Welsh Government supports comments made by the ExA during the ISH about the desirability for a joined-up management plan which covers each of the Kitchen Garden, Valley Garden and the listed building (Felin Gafnan). Welsh Government will work with Horizon and IACC to seek to secure this and appreciates that delivery of certain elements (beyond the Kitchen Garden) will be subject to necessary rights being secured or agreement reached with landowners.

4 Welsh Government Position on Crown Land / S135 Consent

Action Point 17 (05 March 2019)

4.1.1 Welsh Government is considering the request for Crown Land consent recently made by Horizon. Welsh Government is under a duty pursuant to sections 3 of the Well-being of Future Generations Act 2015 to carry out sustainable development. Sustainable development is defined in section 2 of the FG Act as "*the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle (see section 5), aimed at achieving the well-being goals (see section 4)*".

4.1.2 Welsh Government will continue to have regard to this duty when deciding whether to give section 135 consent in respect of its land interested affected by the project. As part of this, consideration will be given to the impact of the project on the four aspects of well-being. Welsh Government are working to be in a position to respond before Deadline 9 and have advised Horizon of this position.

5 Phasing Strategy

Action Point 14 (06 March 2019)

5.1.1 Welsh Government's Deadline 6 Submission (REP6-062) consisted of comments provided to Horizon on 28 January 2019 regarding the updates to the Phasing Strategy. **Appendix B** of this Deadline 7 Submission provides further comments from Welsh Government in respect of the proposed phasing for the Wylfa Newydd Power Station development with a focus on necessary triggers for the TWA in response to Action Point 14.

6 Transport, Traffic, and Highway Matters

Action Point 15

6.1.1 As presented at the ISH on 06 March 2019, the main points that are outstanding are:

- (1) HGV movements leaving the Main Site during the AM and a requirement to restrict movements across Britannia Bridge;
- (2) Requirement for Horizon to cover reasonable and necessary to cover the Design, Build and Finance of the Operation and Maintenance Agreement (DBfO) costs associated with the A55; and
- (3) Code of Construction Practice (CoCP) and Sustainable Travel.

(1) HGV Movements

6.1.2 Welsh Government's position is that the flow of traffic from the mainland during the AM peak on the strategic highway (which backs up from the single land Britannia Bridge) is already subject to congestion. Welsh Government is concerned about empty construction HGV's leaving the WMDA causing severe issues during the AM peak and it makes no sense to add HGV's to the traffic. Welsh Government therefore seeks a modest commitment in the CoCP or DCO to ensure that empty HGV's will not be released from the WNDA during the hours of 07.00 – 08.30. This should not cause Horizon any operational issues as we understand first HGV movements of the day are due to originate from the Parc Cybi Logistics Centre at 07.00. Horizon have indicated that it will take 30 minutes for the HGV to travel to site and approximately 60 minutes for the HGV to unload, therefore, empty HGV's are unlikely to be leaving site before 08.30 in any event.

(2) DBfO Costs (Shadow Toll)

6.1.3 Welsh Government considers that it is reasonable and necessary to cover the increased costs that will be incurred by Welsh Government pursuant to the DBfO contract as a direct result of the significant number of HGV's associated with the development to be borne by the Applicant.

6.1.4 Welsh Government has received indicative additional costings from Highways England that Welsh Government will be liable for if the development proceeds (based on the predicted HGV movements of the development) and shared these with the applicant. These costs are estimated to be approximately £100,000 per annum for four years.

6.1.5 The applicant has, to date, refused in principle to indemnify Welsh Government in respect of these costs. Welsh Government's position is simple: Why should the Welsh public purse be responsible for these increased costs which will be incurred as a direct result of the development? The section 106 commitment would meet all the requisite policy tests. In practice, it may well be the case that the actual costs are much lower if the development does not proceed for some time as the DBfO contract is due to expire in 2028. Welsh Government would be content for the section 106 obligation to provide that costs will be limited to those incurred as a direct result of the development for which Welsh Government is liable for under the DBfO and subject to a cap. If the applicant continues to refuse to do so, then the Secretary of State could include an indemnity in the DCO.

(3) Code of Construction Practice (CoCP) / Sustainable Travel

6.1.6 Welsh Government has discussed the CoCP with the Applicant in respect of transport matters. At **Appendix E** to this note, Welsh Government sets out the points it wishes to see addressed in respect of the CoCP and Dalar Hir Park & Ride Sub-CoCP (or alternatively within the DCO by the Secretary of State by way of DCO requirement)

7 S106 Agreement

Action Point 34 (06 March 2019)

Schedule 4 – Employment and Skills Service and Supply Chain

7.1.1 Welsh Government have previously presented evidence, at the Issue Specific Hearings in January 2019 and in response to the Further Written Questions, that the proposed Jobs and Skills Contribution is not considered to be sufficient for pre- and post-16 education. **Appendix C** of this Deadline 7 Submission sets out a note comprising of Welsh Government's position in respect of the employment, training and skills offer proposed by Horizon in the S106 Agreement.

Schedule 5 – Worker Accommodation

7.1.2 IACC, Gwynedd Council and Welsh Government provided a Joint Housing Paper at Deadline 4 of the Examination. It is agreed between these parties that the proposed quantum of the Worker Accommodation (Capacity Enhancement) Contribution is currently insufficient. **Appendix D** of this Deadline 7 submission sets out Welsh Government's position on Housing Fund. This note raises concern that the fund proposed by Horizon is not adequate to mitigate the housing impacts identified as well as areas of agreed concerns raised through the Joint Housing Note.

8 Draft Development Consent Order and CoCP

8.1.1 **Appendix E** of this Deadline 7 submission comprises comments made by Welsh Government in relation to the draft Development Consent Order (Revision 4.0, submitted at Deadline 5, REP5-003).

Yours sincerely,

James Hooker (MRTPI)

Wylda Newydd Spatial Planning Manager, Welsh Government

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Appendices

Appendix A: Archaeological Information

Appendix B: Representation on Phasing Strategy

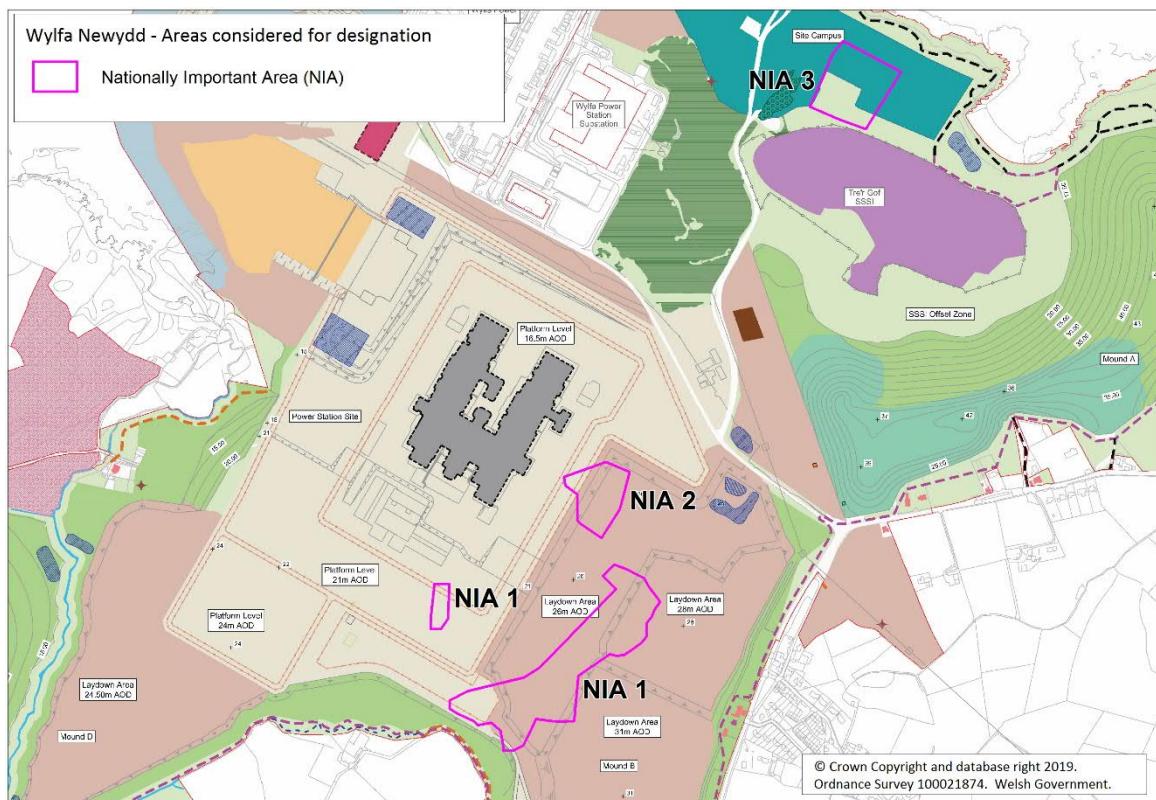
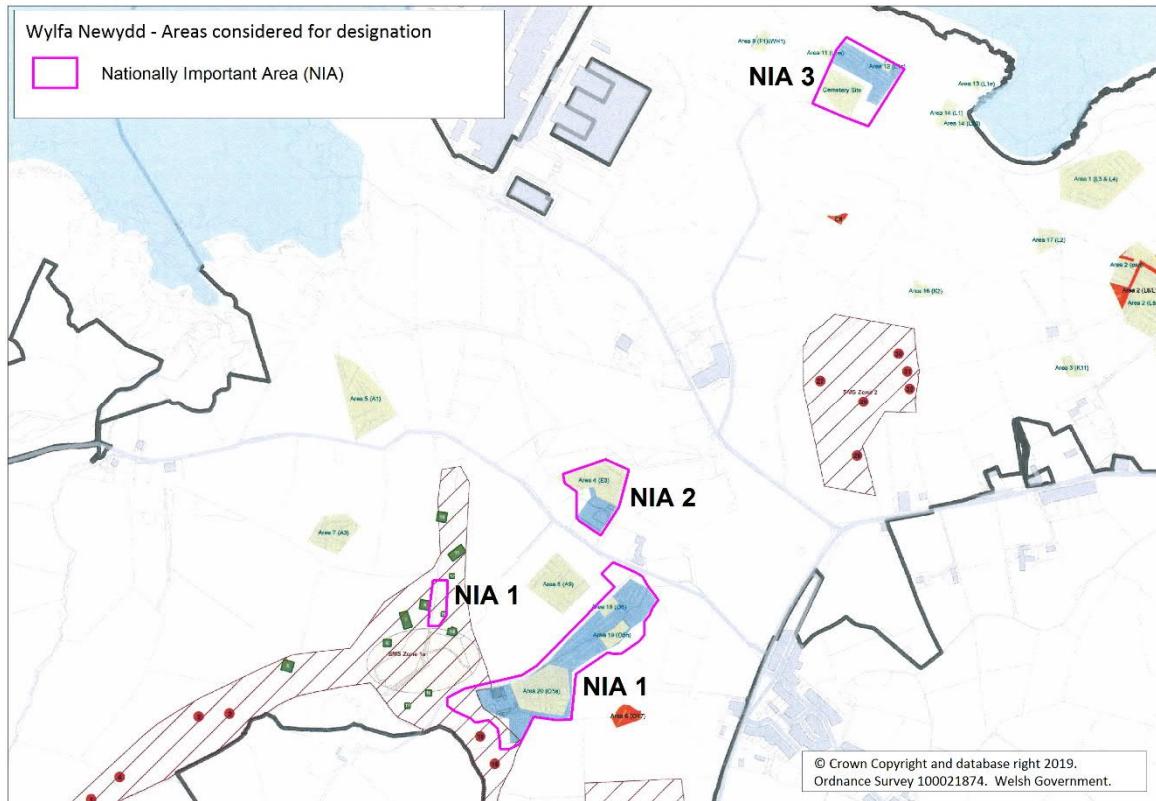
Appendix C: Employment, Training and Skills Representation

Appendix D: Accommodation and Housing Representation

Appendix E: Welsh Government representation on draft Development Consent Order

Appendix A

Archaeological Information



Appendix B

Representation on Phasing Strategy



APPENDIX B – PHASING STRATEGY AND THE DELIVERY OF THE SITE CAMPUS (TEMPORARY WORKER ACCOMMODATION)

1. Introduction

1.1. The Site Campus has been identified by Horizon as 'Key Mitigation'. Crucially, the provision of 4,000 bedspaces will provide for 44.4% of the overall worker numbers assessed in the Environmental Statement, and in respect of Non Home Based workers will account for 57% of accommodation. To highlight, as a ratio this broadly means that for every 1,000 Non Home Based workers, there is a need to provide approximately 570 bedspaces on the Site Campus. Welsh Government has provided previous representations (REP2-367) regarding the need for early delivery of the phases of the Site Campus and how the current proposed phasing is not in line with the potential demand from the build-up of the workforce.

1.2. This is a significant concern for Welsh Government because Horizon's assessment of impacts in relation to matters such as housing, transport and tourism were predicated on and rely on a high level of occupancy of the onsite campus. If not achieved, impacts will be significantly greater than those assessed.

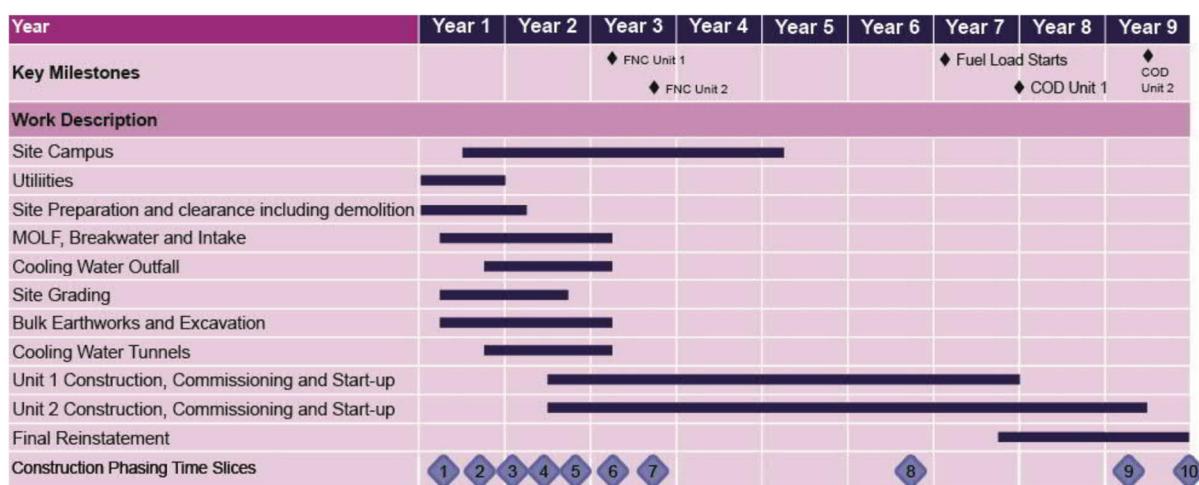
1.3. This note provides a further update to the Examining Authority to reflect upon the latest position being proposed by Horizon following the Issue Specific Hearing on Monday 4 March 2019, and should be considered in addition to Welsh Government's previous comments submitted in Appendix B of the Deadline 6 submission (REP6-062).

2. Welsh Government Position

2.1. Welsh Government has previously raised concerns [Appendix B of REP6-062] about the proposed triggers for delivering the phases of Temporary Worker Accommodation (TWA), and the proposed reliance that 50% of the bedspaces would be provided in the final phase. In particular, that the current proposed triggers for phasing could result in Horizon working outside of the parameters assessed in the Environmental Statement, which would be contrary to paragraph 9.1.6 of the Workforce Accommodation Strategy (APP-412), which states:

The delivery of the Site Campus will be subject to a requirement requiring its delivery prior to the workforce exceeding a fixed level. The level of the cap is to be agreed through the SOCG process, but will ensure that the number of NHB workers using the PRS, tourist accommodation etc. does not exceed the 3,000 that has been assessed in the Environmental Statement.

Indicative Construction Timeline for the Wylfa Newydd Development Area



KEY: — based on reference construction schedules

Source: Figure 2.1, Document 6.4.17 Construction Method Statement (Revision 2.0), REP5-019



- 2.2. Page 64 of the Construction Method Statement (CMS) (Revision 2.0, REP5-019) identifies that Phase 1 of the Site Campus (1,000 bedspaces) will be complete at Time Slice 3 (Site Grading). As per the figure above, this would imply Q1 Y2, and not Q4 Y4 as previously stated by Horizon, and that the total campus (page 66 of the CMS) would be complete at Time Slice 5 (Q4 Y2). Therefore, it would appear from Horizon's own evidence that it is possible to deliver the site campus at an earlier date.
- 2.3. Welsh Government suggest that the Phasing Strategy is amended to align with the delivery timescale in the CMS. It is also considered that the Phasing Strategy should be renamed as the Key Mitigation Delivery Strategy, so that it is clear what it relates to.

3. Concerns raised at Issue Specific Hearing regarding blasting and major earthworks

- 3.1. The Main Site Sub CoCP (revision 3.0, REP5-022) includes controls regarding the limits for vibration and noise, and such activity can only take place during daylight hours.

Monday to Friday between 09.00 and 19.00, and Saturday between 08.00 and 13.00 (With no blasting after dusk between March and September). In practice, because of the change in length of day and the change to BST, dusk falls after 19:00 from April until September
- 3.2. Horizon have also amended the proposed shift pattern from 3 night shifts to 1 night shift for first three years prior to First Nuclear Construction. This would indicate that the majority of work activity will take place during daylight hours (as 2 day shifts) in the early years of construction. This is supported by the Noise and Vibration Modelling and Assessment Methodology Report (APP-086) which states at paragraph 4.1.8 that at the Wylfa Newydd Development Area, earthworks activities would occur during daylight periods only.
- 3.3. Welsh Government stated at the Issues Specific hearing that it is not aware of any evidence before the Examining Authority that suggests that Temporary Worker Accommodation could not be provided sooner due to the requirements around blasting and major earthworks. In addition, Horizon did comment at the Issue Specific Hearing around potential difficulties for providing the amenity building for workers early in the process. Welsh Government is not aware of any evidence before the Examining Authority that would preclude this, and indeed page 64 of the Construction Method Statement (REP5-019) identifies that Phase 1 of the Site Campus would be complete at Time Slice 3, which would need to provide appropriate amenity and catering facilities.
- 3.4. Consequently, Welsh Government considers that it would be possible to release early phases of Temporary Worker Accommodation and through the Worker Accommodation Management Service (WAMS) ensure that occupation was only taken up by workers tasked to work on a day shift (e.g. allowing rest during the night when less noisy activity on site will be undertaken).

4. Suggested changes to the triggers for delivering the Site Campus

- 4.1. In light of the information in the CMS, the controls around noisy activity, the role the WAMS could play to ensure that in the early years of construction occupation of the first phase of the TWA was limited to workers on day shifts, the Welsh Government would suggest that the Phasing Strategy is amended as follows:

Phase	Number of Bedspaces	Trigger
1	1,000	Quarter 1 Year 2, or 2,000 Non Home Based Workers (whichever comes first) – restricted to Day Shift Workers
2	500	Quarter 1 Year 3, or 3,000 Non Home Based Workers (whichever comes first)
3	1,500	Quarter 2 Year 4, or 4,200 Non Home Based Workers (whichever comes first)
4	1,000	Quarter 4, Year 5, or 6,000 Non Home Based Workers (whichever comes first)

Appendix C

Employment, Training and Skills Representation



APPENDIX C – EMPLOYMENT, TRAINING AND SKILLS REPRESENTATION

1. Introduction

1.1. The following representation has been prepared in response to Horizon's Draft Section 106 Agreement (v3.0) submitted at Deadline 6 [REP6-004]. This note focuses on the mitigation proposed by Horizon relating to employment, training, and skills, including:

- Why a proportionate and timely mitigation strategy is critical to the North Wales economy;
- Clarification on the projected construction workforce demand and risk of displacement;
- The mitigation proposals presented within the Draft S106 Agreement (v3.0); and
- Welsh Government's concerns and alternative proposals for the proposed Jobs and Skills Contribution, including quantum and triggers.

1.2. As Welsh Government have previously highlighted within the Written Representation (REP2-367), Horizon's project and assessment in the Environmental Statement is predicated on achieving the following:

- 2,000 home based workers;
- 7,000 non- home-based workers (of which);
 - 4,000 in Temporary Worker Accommodation;
 - 3,000 offsite (PRS, latent and tourist);

1.3. Consequently, if there is a failure to achieve a home-based workforce of 2,000, there will be consequent knock-on effects as a greater number of home based workers would be required to meet the envisaged labour demand. Horizon has always acknowledged that there will be a need for post-16 education and training for the local labour force to ensure that the necessary skillsets (and upskilling if necessary) is achieved to secure 2,000 home based workers. Therefore, there is common ground that a post-16 Skills Fund is necessary and reasonable, however, to date, Welsh Government and Horizon has not agreed the scale of the fund.

2. The development and delivery of appropriate training and skills is important to Welsh Government

2.1. Welsh Government has responsibility for Post-16 Education and is therefore integral to a successful employment, training, and skills programme at Wylfa Newydd. Welsh Government welcomes Horizon's aspiration for home-based employment in the local area, and wants to maximise the employment of people who are new to the workforce, those who are unemployed, those who are economically inactive, and those who are under-employed. Welsh Government also want to maximise the employment of residents in higher-quality roles, and not just in low quality roles on the Project.

2.2. Since 2014, Welsh Ministers have invested £11,500,000 in education and skills development within the locality. This includes; a contribution towards the new Engineering Centre (soon to be opened at the Llangefni campus of Grwp Llandrillo Menai), Continuing Professional Development (CPD), STEM outreach activity, school engagement, and other provisions within the construction and engineering sectors. Therefore, Welsh Government wants to maximise the economic impact of Wylfa Newydd during the construction period. This means both helping to maximise the positive impact of employment at Wylfa Newydd, and minimise any negative impact elsewhere in the local economy. In addition, Welsh Government, wants to avoid 'boom and bust' and ensure a legacy of high skills in the local area which contribute to ongoing high-quality employment after the construction of Wylfa Newydd is completed.



- 2.3. Horizon has stated its commitment to working with partners in Anglesey and across North Wales to deliver a skills programme that both supports the efficient construction and operation of Wylfa Newydd and delivers a legacy for the local economy of a higher skilled, higher productivity workforce. At the same time, Horizon has acknowledged concerns raised by stakeholders, including Welsh Government, that Wylfa Newydd will recruit workers from existing businesses and services across several sectors, leaving behind vacancies that are hard to fill.
- 2.4. Horizon has identified that their workforce will need to be both Suitably Qualified and Experienced Personnel (SQEP). Therefore, if skilled and well-trained individual move from existing local employment to jobs on the project (and related to the project) and the post cannot be filled, there will either be a significant cost to local businesses in replacing and/or retraining or upskilling staff, or a significant impact on the business because of not being able to replace staff.
- 2.5. **If displacement becomes a significant issue, Welsh Government will be faced with pressure to relieve the situation by investing more into training provision in the region. There is a chance that other sectors, possibly across all of Wales, would have to see their funding / levels of provision reduced to alleviate the strain, particularly within the construction and engineering sectors.**

3. Construction workforce demands and risk of displacement

- 3.1. As presented in our Written Representation [REP2-367], Welsh Government's position is that there are insufficient suitably skilled unemployed people to meet Horizon's stated home-based local demand, particularly in the civil operative's sector and mechanical & engineering sectors. There is currently no evidence before the Examining Authority that suggests the project's home-based labour requirements can be met solely from those claiming JSA (i.e. those best-placed to get a job) or 'all unemployed' (i.e. a broader definition than JSA claimants only, but note that many of these are not ready or suitable for work)¹.
- 3.2. The full analysis and consideration of the JSA and ILO datasets, to inform the availability and suitability of the unemployed workforce in the TTWA and DCCZ is presented in REP2-367 [Pages 16 to 21] of Hardisty Jones's Displacement Report].
- 3.3. Horizon has suggested that the requirement for home-based labour can be met from the pool of ILO unemployed in the entire DCCZ. However, many of these people will not have suitable skills to work on the Wylfa Newydd project. We also note that around one-third of project roles are in Site Services, Clerical & Security which is likely to draw employees from a smaller area more akin to the TTWA than the entire DCCZ.
- 3.4. The analysis carried out and presented in Welsh Government's Written Representation [REP2-367] has identified that meeting the demand for home-based workers for the Wylfa Newydd project is likely to require the recruitment of people who are already in work in the DCCZ (i.e. the local area). This will mean the need to back-fill vacant posts, and if this cannot be done it will cause displacement. As set out in Table (Figure 4.1, Appendix B of REP2-367), Welsh Government has estimated that 1,350 – 2,220 additional home-based roles (across a range of occupations) will need to be backfilled to address the risk of displacement, and fulfil the 2,000 home-based worker roles identified in the Wylfa Newydd Environmental Statement.

¹ ILO Unemployed includes those without a job, who want a job, have actively sought work in the last four weeks and are available to start work in the next two weeks; or are out of work, have found a job and are waiting to start it in the next two weeks. Those who are out of work but do not meet the criteria of ILO unemployment are economically inactive

Table 1 – Local Labour Engagement

Occupation	Total Demand at Peak	Local Labour Content at Peak
Site services, clerical and security	902	689 - 812 (75% - 90%)
Managerial and supervisory	1,998	26 - 237 (1% - 2%)
Civils operative	3,069	134 - 717 (4% - 23%)
M&E operatives	2,580	68 - 362 (3% - 14%)
Operational	451	191 - 226 (42% - 50%)
TOTAL	9,000	1,350 - 2,250 (15% - 25%)

Source: Figure 2.1, page 7 of Appendix B of Welsh Government Written Representation [REP2-367]

3.5. Given the risk of displacement, and the need to provide a suitable training scheme to secure 2,000 home based workers without creating adverse effects on the local business community, it will be important for the Jobs and Skills Implementation Plan (JSIP) and worker qualification requirements to be identified as early as possible. It should be recognised by Horizon that provision of suitable training may take a number of years and therefore the mitigation will need to be delivered as early as possible, with possibly some funding being released pre-Implementation of the DCO to ensure that training providers have funds to deliver the JSIP. With Horizon's Supply Chain Action Plan (SCAP) and JSIP still to be fully developed, Welsh Government (and other stakeholders) must be satisfied that appropriate measures are secured through the S106 to ensure that the necessary plan and delivery mechanisms can be put in place at the right time throughout the Project, to deliver education and training programmes that maximise the employment opportunities of people who are new to the workforce, those who are unemployed, those who are economically inactive, and those who are under-employed.

4. Horizon's Proposed Mitigation

4.1. Horizon are currently proposing to provide the following by way of mitigation in relation to Skills:

Jobs and Skills Contribution

4.2. The Draft Section 106 Agreement [REP6-004] outlines a Jobs and Skills Contribution of **£10,000,000** that will be available for:

- Training and return to work programmes in respect of unemployed, underemployed and reskilling;
- Undertaking worker readiness training;
- Establishing communication routes within local communities to enhance awareness of the training and employment opportunities linked to the Development;
- Improving the capabilities and flexibilities of the local workforce;
- Funding and supporting a suite of evidence based mitigation measures to strengthen the education and training of the local workforce;
- Funding courses to fill gaps in the provision appropriate to the operational phases of the Development; and
- Funding and supporting mitigation measures during the operational phases of the development.

4.3. Horizon has attributing 70% of the Jobs and Skills Contribution for onward payment to specialist training partners (which may include Grwp Llandrillo Menai) as set out in Jobs and Skills Implementation Plan. The remaining 30% is identified for training and return to work programmes. In addition, a Jobs and Skills Contingency Fund of £2,000,000 (as of Deadline 6) is available if monitoring (Year 2 – Year 5 of the Construction Period) suggests the Developer will not achieve the target of 2,000 home-based workers at peak construction.



How has the £10m fund been calculated?

4.4. In response to the Examining Authorities Further Written Questions (Q2.10.22) [REP5-002], Horizon has indicated that the Jobs and Skills Contribution was calculated as follows:

- Horizon drew upon a range of precedent and evidence to develop the scale of the fund. This evidence informed the planned measures to ensure a peak home-based workforce of 2,000.
- With respect to moving people from worklessness into work, £4,350,000 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 also been reviewed to estimate the cost of supporting 1,000 apprenticeships (estimated cost of £1,000,000) and 1,000 workers being upskilled (estimated cost of £2,000,000).

4.5. Welsh Government note that Horizon has, separately, made a commitment to deliver 2.3% of the total construction workforce at peak (i.e. 207) as apprentices on the Project. Welsh Government have requested clarification from Horizon as to whether these apprentices are separate to those allocated through the Jobs and Skills Contribution.

4.6. Welsh Government also note that Horizon has provided *estimated* costs of training but have failed to provide the evidence to support these estimates or provide details of what standard of qualification / training would be delivered and over what period. Without this clarity, Welsh Government remain very concerned that an appropriate Jobs and Skills Contribution has not been delivered through the draft S106 Agreement.

5. Welsh Government's Case

Realistic cost required to deliver Horizon's proposed training requirements

5.1. Through the Examination process, Welsh Government have requested better information from Horizon on numbers, skills, and experience required from home-based workers. It is Welsh Government's position that appropriate training must take place in advance of need.

5.2. **Table 2** (overleaf) provides details of actual costs for further education and apprenticeship training programmes which are supported/delivered through Welsh Government initiatives.

Table 2 – Further education and apprenticeships training programmes and actual costs

Apprenticeships			
Sector	Annual Cost (£)	Duration	Total Cost (£)
Engineering up to Level 2	4,309	24 months	8,618
Engineering up to Level 3	5,669	36 months	17,007
Construction up to Level 2	4,917	24 months	9,834
Construction up to Level 3	4,670	42 months	16,345
Further Education			
Sector	Annual Cost (£)	Duration	Total Cost (£)
Engineering Level 2	5,846	12 months	5,846
Engineering Level 3	5,846	12-24 months	5,846 – 11,692
Enhanced Engineering Level 2	10,160	Extended college year	10,160
Enhanced Engineering Level 3	10,160	24 months	20,320
Construction Level 2	5,831	12 months	5,831
Construction Level 3	5,831	12-24 months	5,831 – 11,662
Enhanced Construction Level 2	10,100	Extended college year	10,100
Enhanced Construction Level 3	10,100	24 months	20,200

- 5.3. There is a noticeable difference between the annual/total actual costs for apprenticeship and further education programmes when compared with the *estimates* provided by Horizon in calculating the Jobs and Skills Contribution. The average apprenticeship scheme, based on actual costs, is approximately **£12,950** (based on the table above). The average further education course (engineering and construction), based on actual costs, is approximately **£11,980** (based on the table above).
- 5.4. Welsh Government acknowledge that match funding will be available for apprenticeship and further education programmes to pick up any potential shortfall in funding. Welsh Government has not formally agreed with Horizon the level of match-funding that would be available. Based on Horizon's proposed *estimates*, there appears to be an expectation that the public purse would need to pick up approximately 92% of the cost.
- 5.5. As an example, working on the basis that match funding can be acquired for 50% of the actual costs for apprenticeships / further education programmes, and Horizon are committed to fulfilling their aspirations for delivering 1,000 apprenticeships and 1,000 up-skilled workers, the post-16 proportion of the Jobs and Skills Contribution would equate to a contribution of **£12,470,000** (*£6.48m for apprenticeship schemes & £5.99m for further education programmes*).
- 5.6. Whilst it is acknowledged that Welsh Government does have a role to promote and support job creation, the contributions being sought through this Jobs and Skills Fund are to directly mitigate the potential adverse impacts that a project of this scale is likely to create in a remote rural part of Wales. Consequently, Welsh Government considers that an adequate Jobs and Skills Fund is necessary and would meet all the relevant planning tests.

Requirement for direct employment or back-filling to reduce risk of displacement

- 5.7. Notwithstanding the issues identified with Horizon's calculation of the proposed Jobs and Skills Contribution and the actual costs for apprenticeship and further education courses identified in **Table 2**, Welsh Government have consistently stated that the training need in terms of the types of courses, numbers, and qualification levels are significantly different to that proposed by Horizon. As presented in Welsh Government's Written Representation [Rep2-367], as a broad estimate of the scale of need there must be training for direct employment or back-filling of the following:
 - 400 to 800 people with suitable skills for Site Services, Clerical & Security;
 - 200+ people with suitable managerial/supervisory skills;
 - 700+ people with civil engineering/construction skills; and
 - 360+ people with mechanical and electrical engineering skills.

Jobs and Skills Contribution - Quantum

- 5.8. During the ISH on Jobs, Skills, and Supply Chain (08 January 2019), Welsh Government identified that the cost to deliver the necessary post-16 training, throughout the construction phase of the Project, would be **£21,000,000 [Twenty-One Million Pounds]**. This would be the total cost and does not reflect the potential for any appropriate match funding opportunities as Horizon has not yet provided the requested information that would allow Welsh Government to consider this. **Table 3** (overleaf) provides a breakdown of quantum presented at the ISH in January 2019 based on Welsh Governments actual costs for training and the number of people that will need training for direct employment or backfilling.
- 5.9. As it is currently proposed, a post-16 Skills Fund of £7 million would only equate to 33% of the cost of delivering this training and therefore even if Welsh Government are to accept the position made by Horizon at the Issue Specific Hearing on Wednesday 6 March 2019 that the public sector should provide match funding, there would still be a shortfall of £5 million, which clearly indicates that the Skills Fund is not sufficient.



Table 3 – Welsh Government’s position on Skills Fund contribution

Number of people needing training	Job Type / Group	Unit Cost per course	Total Cost
200	Security / Site Services	£4,406	£881,200
300	Catering	£4,270	£1,281,000
200	Administration	£3,763	£752,600
700	Total		£2,914,800
100	Management Level 3	£5,243	£524,300
100	Management Level 4	£6,046	£604,600
200	Total		£1,128,900
700	Construction Level 3 apprenticeships	£16,345	£11,441,500
360	Engineering Level 3 apprenticeships	£17,007	£6,122,520
1,060	Total		£17,564,020
1,960	Total		£21,607,720

5.10. Welsh Government are very concerned that Horizon’s own estimates for Post-16 skills and education funding are inadequate. Horizon has presented their aspirations for delivering 1,000 apprenticeships and 1,000 upskilled workers. Welsh Government have clearly identified that, based on 50% of training costs captured through match funding, a minimum of **£12,470,000** is needed within the Jobs and Skills Contribution to deliver Post-16 skills and education training. However, this does not factor in the requirement to ensure a suitable pool of skilled labour will be available to backfill roles in local businesses (through the WNESS) and mitigate any displacement impacts.

5.11. Consequently, Welsh Government suggest that it would be appropriate to provide a Post-16 skills fund of **£12,000,000** with appropriate contingency provision of **£3,500,000** should the Skills Engagement Group through monitoring identify a need for further interventions because of displacement or a risk that 2,000 home-based workers are not being achieved.

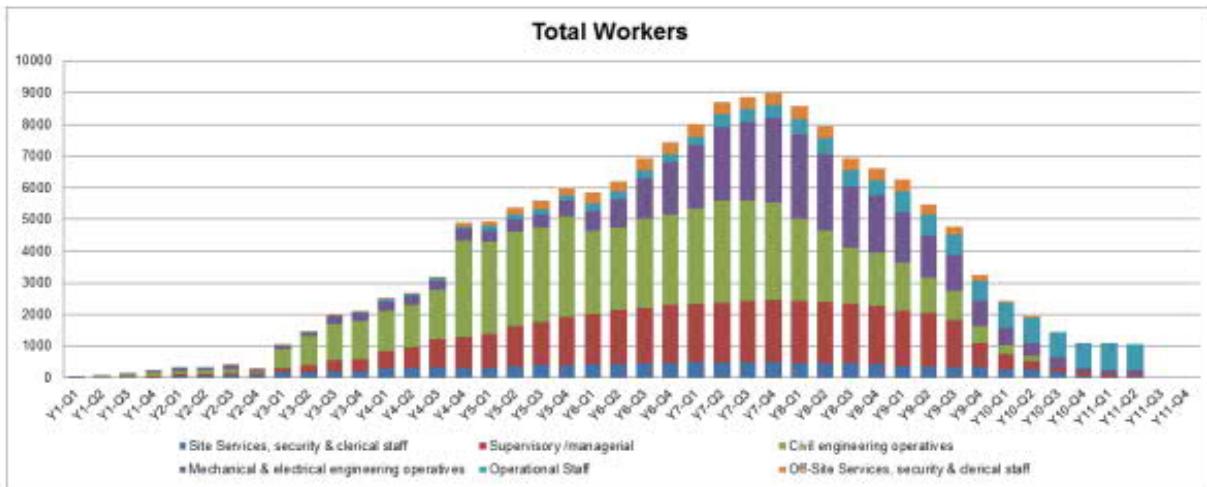
Timing of Jobs and Skills Implementation Plan (JSIP)

5.12. The Jobs and Skills Implementation Plan (JSIP) will need to be prepared at least 12 months prior to implementation of the DCO, this is to ensure that the appropriate time is available to deliver the JSIP from the following academic year.

5.13. Typically, training periods to deliver training (both apprenticeships and further educations) average two years. Welsh Government are therefore concerned that there is a significant increase in the workforce predicted at the end of Year 2 of the construction programme, as set out by Horizon in Figure 2.2 [APP-088] (overleaf). Without appropriate intervention at the appropriate time, there will be a significant lag in the training workforce available to work on the Wylfa Newydd Project and an increase risk of displacement to local communities in the KSA.

5.14. Welsh Government have previously raised concerns (REP2-367) regarding the churn of workers throughout the construction period (e.g. 30,000 – 40,000 job roles) and the proposal to focus on recycling home based workers to fill more than one role over the construction period. Therefore, Horizon’s approach in this regard will indicate that the need for additional and ongoing training support for home based workers would extend to a greater number than just an initial 2,000. If sufficient skills funding is not available to provide these additional training courses, then there is a significant potential that rather than recycling workers, there will be an increased risk of displacement from existing businesses within the DCCZ.

Figure: 2.2: Indicative Construction Workforce Profile



Appendix D

Accommodation and Housing Representation



APPENDIX D – HOUSING AND ACCOMMODATION REPRESENTATION

Introduction

- 1.1. The following representation has been prepared in response to Horizon's Draft Section 106 Agreement (v3.0) submitted at Deadline 6 [REP6-004].
- 1.2. Welsh Government has provided extensive evidence in our Written Representation [REP2-367] regarding why it does not agree with Horizon's estimates of available housing stock across a range of sectors (including tourism). This is further supported in the Joint Housing Paper submitted at Deadline 4 [Appendix A of REP4-053]. Over the last 12 months, through the Strategic Housing Partnership and Three engagement with Local Authority Housing Officers, there has been collaborative working regarding both the availability of supply of accommodation and the realistic unit costs for providing a comprehensive set of housing mitigation measures.
- 1.3. Appendix B of Welsh Government's Deadline 7 representation (14 March 2019) sets out the critical importance of ensuring appropriate phasing and delivery of the Temporary Worker Accommodation (TWA) as part of providing the key mitigation for the Project in relation to the potential for housing impacts.
- 1.4. This representation focuses on the mitigation proposed by Horizon relating housing and accommodation matters, including:
 - The quantum of the proposed Worker Accommodation (Capacity Enhancement) Contribution;
 - The percentage (%) split (to relevant Local Planning Authorities) of the Worker Accommodation (Capacity Enhancement) Contribution;
 - The quantum of the Accommodation (Contingency) Fund; and
 - The accessibility of the Accommodation (Contingency) Fund.

Worker Accommodation (Capacity Enhancement) Contribution

Quantum

- 1.5. The Draft S106 Agreement [REP6-004: Schedule 5] summarises the definition, quantum, and payment installations of the Worker Accommodation (Capacity Enhancement) Contribution.
- 1.6. The Worker Accommodation (Capacity Enhancement) Contribution has been included within the S106 Agreement to enable Local Authorities to increase the supply of housing (including affordable housing) during the construction of the Project. The draft S106 sets out that the contribution must be paid towards initiatives to target an adequate supply of local housing provision for use by the construction workforce which will equate to 1,875 bed spaces by peak construction.
- 1.7. The draft S106 Agreement (v3.0) presents a Worker Accommodation (Capacity Enhancement) Contribution of **£13,500,000 [Thirteen Million Five Hundred Thousand Pounds]** (BCIS Indexed). Annex 2 (Schedule 5) of the draft S106 Agreement sets out an indicative breakdown of how the Contribution will be allocated. This is presented in Table 1 of this representation.
- 1.8. Welsh Government acknowledges that on the face it this fund has increased from earlier figures presented to the Examining Authority and stakeholders. However, this has been done by reducing the contingency fund, which other Local Authorities could be reliant upon should workers choose to live in areas which do not fall within the predictions of the gravity model.



Table 1 - Horizon's indicative type of spend for delivery of new bed spaces

	Anticipated share of contribution	Spend per unit (average) applied to reach overall anticipated share of contribution	Number of units anticipated can be delivered	Number of bed spaces anticipated can be delivered by year 5 of construction utilising the contribution
Empty Homes	£3,000,000	£20,000	150	375
Minor grants (latent accommodation)	£500,000	£1,000	-	500
Market efficiency (rental deposits, downsizing)	£500,000	£5,000	100	250
New build (PRS or owner occupied)	£10,400,000	£35,000	300	750
Total	£14,400,000		550	1,875

Source: Annex 2 (Schedule 5) Draft S106 Agreement (v3.0) – Table 1: Indicative type of spend for delivery of new bed spaces

- 1.9. As presented in Table 1 (whilst indicative), there is significant reliance on apportioning approximately 72% of the housing fund to deliver 300 new build units. As previously identified in paragraph 12.5.14 [REP2-367], Welsh Government has concerns regarding the need to commit funding at the outset due to the long lead-in time to deliver such new build, and therefore the significant risk regarding the ability to ensure that this provision will be in place before the peak impacts occur to ensure effective mitigation. Welsh Government has suggested in dialogue with IACC and Horizon that potentially provision for new build should be delivered in suitable tranches rather than committing most of the fund at the outset so that if there are issues with delivery, there is flexibility for the remaining fund to be targeted towards other measures. This approach could be delivered through the Worker Accommodation Management Service (WAMS) Oversight Board.
- 1.10. It is important to note that Table 1 is identified and included within the draft S106 Agreement. Whilst Welsh Government acknowledge that it has been marked as indicative, regard must be had to this table in finalising an annual programme of works. Therefore, the table cannot be simply disregarded.
- 1.11. Welsh Government note the discrepancy between the total contribution (£13,500,000) in the definition of the Worker Accommodation (Capacity Enhancement) Contribution (Schedule 5) and the total contribution presented in Table 1 (Annex 2, Schedule 5) (£14,400,000).
- 1.12. In Horizon's Deadline 5 Representation [REP5-050], paragraph 2.1.7, reference is made to an unapproved and unagreed draft version of a Three Dragons Report that Conwy County Borough Council submitted as part of their Written Representation [REP2-288], without permission from Welsh Government. The costs included within the draft Three Dragons report are not accepted or approved by Welsh Government.
- 1.13. On 21 December 2018, Welsh Government provided Horizon with an approved housing and accommodation mitigation fund figure of **£27,000,000 [Twenty-Seven Million Pounds]** with a further **£2,000,000 [Two Million Pounds]** attributed to Housing Officer funding. Welsh Government provided this information with a view to initiating further discussion with Horizon, Isle of Anglesey County Council (IACC), and Gwynedd Council, on delivering an appropriate and proportionate Worker Accommodation (Capacity Enhancement) Contribution to mitigate the housing impacts across the KSA.
- 1.14. This fund was calculated based on the evidence provided by Three Dragons Ltd as part of Welsh Government's Written Representation [REP2-367]. The mitigation proposals attributed to this fund and the associated unit costs for delivering the mitigation proposals were prepared in consultation with Housing Officers from Isle of Anglesey County Council (IACC), Gwynedd Council (GC), and Conwy County Borough Council (CCBC) through the Strategic Housing Partnership. Please refer to **Table 2 (overleaf)**.



Table 2 - Welsh Government and Local Authority Housing Officer proposed unit costs

Mitigation Interventions	Unit cost
Empty Homes – bringing long term empties back into use	£25,000
Minor grants – to bring existing PRS up to standard for letting on the open market	£7,000
Minor grants (local) – to upgrade the property but to keep a local tenancy – no rent control	£15,000
Minor grants (LHA) - to keep rents to LHA levels for a period of 7 years – no upgrading required (property upgrading may also be required)	£20,000 - £25,000
Create new lodgings (latent accommodation)	£2,000
Landlord incentives – to include landlord training, advice re Rent Smart, to encourage use of social lettings agency pay SLA one off 'fully tenanted' fee	£1,500
Support to FTB's – deposit and / or equity scheme	£16,000
New build (PRS or owner occupied) ¹ Potential for a range depending on the size of unit to be provided.	£50,125 - £111,800
Officer cost and time	£45,000

1.15. There are noticeable differences in the unit costs attributed to Empty Homes grants and New Build stock proposed by Horizon:

- **New build:** Welsh Government note that within Horizon's Response to Welsh Government's Deadline 4 submission [REP5-050], new build unit costs have been formulated based on advice from Housing Associations and commercial developers on the maximum level of subsidy that would be required under current market conditions. However, Horizon's Response to Welsh Government's Deadline 4 submission [REP5-050, paragraph 2.1.16, point (v)] also refers to new build cost estimates of £40,000 and recognises that costs may be higher in Anglesey. Welsh Government would therefore expect to see unit costs for new build stock closer to Acceptable Cost Guidance (ACG) estimates. The section 106 now proposes that all new build housing will be offered to Wylfa Newydd workers (via first nomination rights) as either PRS or owner-occupied. Welsh Government are therefore concerned about the availability of stock that may be required to address any unforeseen homelessness issues should the predicted distribution (set out in the gravity model) not occur.
- **Empty Homes:** Horizon's Deadline 4 submission indicates that empty home costs of £20,000 would bring back empty homes into use to deliver an average of 2.5 bed spaces per unit. Welsh Government had based their assessment on an average bedspace (per unit) of 2.6. Housing Officers in IACC, GC, CCBC, and Welsh Government have discussed and agreed that the realistic unit cost would be £25,000 per unit based on local evidence to deliver empty homes.

1.16. It is Welsh Government's position that the total Worker Accommodation (Capacity Enhancement) Contribution is not adequate to mitigate the housing impacts identified within Three Dragons evidence [REP2-367] (Chapter 12) and the areas of agreed concerns raised through the Joint Housing Note [Appendix A of REP4-053].

1.17. The unit costs identified by Welsh Government must apply to the '*spend per unit*' which has been applied by Horizon to reach the overall anticipated share of the Worker Accommodation (Capacity Enhancement) Contribution. Please refer to **Table 3 (overleaf)**.

1.18. If all parties are to accept the mitigation proposals (and proposed number of units) outlined in the draft S106 agreement, Horizon's proposed Worker Accommodation (Capacity Enhancement) Contribution is still some way short (approximately £5.4m) of the lowest expected contribution (i.e. **£19,787,500**).

¹ Acceptable Cost Guidance (ACG) – Revised Annexes A&B – January 2018. ACG means the total cost of providing an affordable dwelling when considering the size and specification of the dwelling and its location.



Table 3 – Welsh Government and Local Authority unit cost figures (as per Table 2) to deliver proposed mitigation identified by Horizon (as per Table 1)

	Anticipated share of contribution	Spend per unit (average) applied to reach overall anticipated share of contribution	Number of units anticipated can be delivered	Number of bed spaces anticipated can be delivered by year 5 of construction utilising the contribution
Empty Homes	£3,750,000	£25,000	150	375
Minor grants (latent accommodation)	£500,000	£1,000	-	500
Market efficiency (rental deposits, downsizing)	£500,000	£5,000	100	250
New build (PRS or owner occupied)	£15,037,500	£50,125	300	750
Total	£19,787,500	-	550	1,875

Split

1.19. Section 7.1 of the Draft S106 Agreement [REP6-004: Schedule 5] summarises the split of the Worker Accommodation (Capacity Enhancement) Contribution. Welsh Government has been engaged in further discussion regarding the apportionment of the contribution, however the comments below relate to the version of the S106 currently in the public domain. The current drafting indicates that:

- 95% of the Worker Accommodation (Capacity Enhancement) Contribution will be paid to IACC;
- 5% of the Worker Accommodation (Capacity Enhancement) Contribution will be shared between GC and CCBC.

1.20. This is a significant change in the allocation from v2.0 of the draft S106 Agreement which demonstrated a 75%/25% split. This was formulated on the basis that approximately 25% of the Private Rental Stock (PRS) demand will come from the Menai Mainland. All parties respect the proximity principle; however, all parties also agree that mitigation must occur where impacts happen. Therefore, on the basis that there is a very constrained supply of available PRS, we need to look at the demand figures put forward by Horizon (which all parties have agreed to). This clearly shows that a broadly equivalent number of PRS bedspaces will also be taken up on Menai Mainland as Anglesey North (the host community), which will also need interventions to increase the supply side to accommodate this additional demand if there are not going to be any negative impacts.

1.21. Horizon (and IACC) appear to indicate that there is additional supply on the Menai Mainland and have referenced the Arc4 Survey [REP5-080]. Welsh Government would wish to highlight that Horizon's references to the Arc4 study [paragraph 2.1.11, REP5-050] do not consider the full context of the report's conclusions, particularly the differing influences on the mainland that would influence the availability of supply. Welsh Government would draw the Examining Authorities attention to paragraphs 6.8-6.14 of the Arc4 study.

1.22. Concerns around the availability of housing supply have been captured in the Joint Housing Note [Appendix A of REP4-053]. To date, Welsh Government considers that Horizon has not presented any compelling evidence that would demonstrate that there would be suitable supply available within the Key Socioeconomic Study Area (KSA) and therefore postponement of the housing fund should reflect the proposed gravity model allocations as set out in Table 3.14, APP-096).

1.23. There is ongoing dialogue between all parties in relation to the split of the Worker Accommodation (Capacity Enhancement) Contribution. The current proposal of a 95%/5% split is unacceptable to Welsh Government. Welsh Government will continue to engage with IACC, HNP and GC to resolve this issue prior to Deadline 8, where the Examining Authority is expecting the final draft S106 to be submitted.



Accommodation (Contingency) Fund

Current Proposals

- 1.24. The draft S106 agreement (v3.0) [REP6-004] includes a contingency sum of £1,500,000. Welsh Government have grave concerns that the contingency fund will be inadequate to address potential housing impacts that may arise across Anglesey and the Menai Mainland. Welsh Government note that the tracked changed version of the S106 Agreement submitted to the Examining Authority [REP6-005] originally had a contingency fund of £5,000,000.
- 1.25. Horizon are now proposing to link the non-occupation or delivery of the Temporary Worker Accommodation to the Contingency Fund. Consequently, this contingency fund will be expected to cover a wider set of impacts than originally proposed.

Quantum

- 1.26. If the quantum and split of the Worker Accommodation (Capacity Enhancement) Contribution remains unchanged (as currently proposed in v3.0 of the draft S106 Agreement), the current quantum of the Accommodation (Contingency) Fund would not provide sufficient funds for the Menai Mainland Local Authorities to address the predicted impacts identified in the Gravity Model. Therefore, Welsh Government considers that the Accommodation (Contingency) Fund needs to be increased from the current proposed £1,500,000 to **£5,000,000**. This would ensure that negative impacts which may arise in the Key Socio-economic Study Area (KSA) can be appropriately mitigated, without putting costs on the Welsh Public Purse.
- 1.27. On the basis that the quantum and split of the Worker Accommodation (Capacity Enhancement) Contribution is reassessed and agreed with all relevant stakeholders in general accordance with the position set out in this representation, Welsh Government considers that the Contingency Fund could remain unchanged at £1,500,000.

Implications for the Examining Authority to consider if adequate mitigation is not secured

- 1.28. Welsh Government has significant concerns that have been consistency raised throughout the Examination in relation to impacts on the Welsh public purse from detrimental impacts with respect to housing and accommodation within the KSA. In particular, that there is insufficient supply in the KSA to meet the demands of the 7,000 non-home-based construction workers and as a result potential increases in demand for limited accommodation will result in increased homelessness, the cost of which will fall on Local Authorities and Welsh Government to address.
- 1.29. Horizon's gravity model is based on a series of assumptions which may or may not prove realistic in the future. However, as currently predicted, there will be demand of around 25% of accommodation in the PRS sector in the Menai Mainland. The current proposed allocation in the Fund does not, in Welsh Government's view, provide sufficient resource to mitigate this impact. Consequently, there is a risk of unmitigated costs which will have implications on public funds.
- 1.30. Welsh Government has always been clear that its support for the Project was conditional upon the potential negative impacts being appropriately mitigated so that there would not be any costs on the public purse. Under the Wellbeing and Future Generations Act 2015, Welsh Government is required to consider sustainability and balance the benefits against impacts.

Alternatives for securing mitigation

- 1.31. Welsh Government is aware the Examining Authority has asked Interested Parties to identify alternative forms of securing mitigation. In this instance, Welsh Government does not consider that provision could be adequately made through Requirements to the DCO because there is a need for the provision of financial



contributions to deliver the necessary mitigation through third parties. Such financial contributions need to be available in a timely manner to ensure suitable mitigation can be provided.

- 1.32. Therefore, it is unlikely that any indemnity in the DCO would be appropriate as this would only be able to reimburse public bodies costs associated with issues such as homelessness after the event. Without an appropriate monitoring mechanism (also proposed to be secured through the S106 Agreement), it would be difficult to establish which cases are attributable to the Project, and therefore create uncertainty as to whether such incurred costs would be reimbursed.
- 1.33. Welsh Government are aware that it could be possible for Horizon to submit a Unilateral Undertaking to the Examining Authority rather than a signed S106 Agreement. In such an event, considering Welsh Government's position (please refer to **Section 4.0**), this approach would only be supported if the matters set out in the representation regarding quantum, split, and contingency are satisfactorily addressed.

Appendix E

Welsh Government representation on draft Development Consent Order

DCO – Post Hearing Note following ISH on 6 March 2019

Welsh Government Comments on DCO

14 March 2019

DCO Ref	Issue
“maintain”/ Tailpieces Generally	WG raised concern at the ISH that tailpieces used throughout the draft DCO are not expressly limited to the maximum parameters assessed within the ES and there is a lack of clarity around “materially” different effects. WG is concerned this creates the potential for the project to go beyond the “Rochdale envelope” (see Advice Note 9 which advocates that the consent should create clearly defined parameters). It is understood the applicant is not seeking power to exceed the maximum parameters assessed in the ES. If this is the case, we see no reason why the following wording cannot be inserted after “Environmental Statement” “and do not go beyond the maximum parameters assessed within the environmental statement”. This would be in addition to the existing wording and so would still retain the flexibility sought by the applicant.
“SPC Permission” and Article 5 (SPC Permission)	WG do not resist the principle of article 5 as we understand the purpose is to seek to speed up delivery. WG query whether, for clarity, the definition of “SPC Permission” should be consistent with the works permitted under “Work 12” by cross reference. Otherwise the exercise to be carried out under article 5(6) in terms of determining which DCO Requirements have been discharged in whole or part could potentially be complex and unclear in circumstances where a future SPC Permission authorises materially different works (potentially of smaller extent and type) to those authorised under Work 12. In any event, two detailed drafting points: <ol style="list-style-type: none"> Sub-para (3) – suggest for clarity after “Order” inserting “in the circumstances set out in paragraph (1). Sub-para (6) – cross-referencing – amend (2) to (1)
Article 32	Possible Typo – should “or airspace” be deleted given article 32 relates to sub-soil only?
Article 33(3)	Typo in first line
Article 82 (Crown Land) (Action Point 7 of ISH 6/3/19)	HNP confirmed during the ISH on the DCO that the Explanatory Memorandum would be updated to confirm that Crown Land includes those interests of the Welsh Government set out in the book of reference

DCO Ref	Issue
Article 84 (Financial Standing)	<p>HNPs proposed inclusion of a "financial standing test" in the next version of the DCO. WG welcomes this in principle. WG has been suggesting this for some time in respect of each of the following:</p> <ul style="list-style-type: none"> a) Commencement of works in the vicinity of the Kitchen Garden; and b) Steps to vest land or interests under the CPO <p>In respect of the Kitchen Garden, WG had requested inclusion of a specific financial standing test in the section 106 agreement (or alternative provision of security) prior to works to demolish the Kitchen Garden. WG's proposed drafting for the section 106 looked at the assets of the undertaker at the time works were due to be carried out (as opposed to potential future assets). It was agreed that this could instead be dealt with in the DCO. However, the wording of Article 84 does not address WG's concerns in respect of the Kitchen Garden for reasons given below.</p> <p>Security for Project Funding (i.e. Article 84)</p> <p>On the current proposed drafting of Article 84, the SoS needs to be satisfied, at the time of the article 84 approval, that "the authorised development is likely to be undertaken and will not be prevented due to difficulties in sourcing and securing the necessary funding". This test looks ahead at the potential future funding position as opposed to being a true financial standing test of the assets of the specific company as at the date the Secretary of State gives approval under article 84.</p> <p>Whilst it is understood why this type of wording has been adopted in the context of the CPO and relevant CPO policy tests, it does not address the specific concerns of WG in respect of the Kitchen Garden.</p> <p>Welsh Government therefore requests inclusion of additional wording (or a separate test) in respect of the Kitchen Garden to ensure that no works can be carried out in the vicinity of the Kitchen Garden unless the undertaker has demonstrated to the SoS at that time that it has sufficient assets or funding in place to meet the requirements of the Kitchen Garden restoration scheme (as opposed to the undertaker being likely to have assets/ funding at some point in the future). This is to ensure the undertaker actually has assets/ funding in place prior to works being done to flatten the Kitchen Garden. The purpose of this is to back up the proposed restoration and management scheme for the Kitchen Garden which it has recently been agreed will go into the section 106 agreement.</p> <p>If funding/ assets cannot be demonstrated at the time the Kitchen Garden is due to be demolished, then alternative security (as for Work 12) should be provided prior to any works to the Kitchen Garden. It is noted that the Kitchen Garden is to be excluded from Work 12 in the next draft of the DCO by HNP (which is welcomed by Welsh Government) but this does mean that it will not be covered by the security drafting in respect of Work 12.</p> <p>Drafting on financial standing/ acceptable security this has previously been proposed by WG to HNP in the context of the section 106. This drafting is based on National Grid's model protective provisions, a copy of which is contained within the draft DCO.</p> <p>For ease, WG would equally be content for a specific financial standing/ security test to in respect of the Kitchen Garden to go in the section 106 agreement in support of the Kitchen Garden restoration and management plan to be included in that agreement.</p>

DCO Ref	Issue
Work No.12 (Schedule 1)	<p>HNPs has agreed to the following points which WG looks forward seeing picked up in the next draft of the DCO in respect of Work 12:</p> <ol style="list-style-type: none"> Deletion of "other associated works" Exclusion of encroachment onto the Kitchen Garden area under Work No.12
Other Associated Development (Schedule 1)	<ol style="list-style-type: none"> Delete reference to "Work No.12" so that the "other associated development" does not apply to Work No.12. This point has been agreed by HNP (p) – see comment above in respect of tailpieces. Insert "and do not go beyond the maximum parameters assessed within the environmental statement"
Schedule 3 (4) – Tailpieces	See above general comment on tailpieces. Request inclusion of "and do not go beyond the maximum parameters assessed within the environmental statement".
PW2 (Phasing - Schedule 3)	<ol style="list-style-type: none"> WG has commented separately in this D7 note on the draft Phasing Strategy In terms of the wording of PW2, WG suggests deletion of "the sequencing set out in the" as this doesn't reflect the wording of the Phasing Strategy itself and reference to "sequencing" in PW2 has the potential to cause further confusion. WG requests to be named as a consultee on any amends proposed to the Phasing Strategy
PW3 (Construction Method Statement)	<p>WG is content with inclusion of "general accordance" in respect of the CMS so as to provide some flexibility to aid delivery provided the triggers for Key Mitigation within the Phasing Strategy under PW2 are tightened up and improved in respect of the TWA line with WG's representations in this D7 submission on the Phasing Strategy.</p> <p>In respect of sub-para (2), please see comments above in respect of tailpieces.</p>
PW7 (AILs)	<ol style="list-style-type: none"> WG has some outstanding concerns in respect of the revised CoCP (in respect of Transport) and comments are set out separately below in respect of the CoCP. WN1 now includes an AIL requirement under WN(3)(b) which is welcomed, but WG consider this should be project wide and be moved to PW7. WG understands based on its SoCG with HNP that the peak of AIL activity will be during the first two years. WG therefore considers that the AIL Scheme should also apply to Work No.12 (unless HNP can confirm they will not be required for the SPC works) and so the exclusion at PW7(2) should not apply in respect of the AIL Scheme and para 5.4.6 of the CoCP should be amended to reflect. WG is aware that the STGO 2003 includes certain limited notice requirements in respect of AILs. However, WG wishes to see a scheme included in view of the number of AILs required and the potential impacts on highways and tourism if they are not dealt with in a coordinated manner (in the context of the single lane crossing at Britannia Bridge and the potential for congestion during peak times by these large, slow moving vehicles)
PW9 (Cessation)	WG requests clarification as to whether an earlier notice should be provided prior to intended cessation of operation of the nuclear power station. There should be no reason this cannot be provided earlier as cessation will not be an immediate step

DCO Ref	Issue
PW10 (Decommissioning)	For clarity and to ensure enforceability, insert in (1) "(or being due to be served, whichever is earliest)"
PW11/12 (Digital Infrastructure Plan)	<ul style="list-style-type: none"> a) Numbering to be checked – the track change version of the DCO misses out "PW11" b) Insert at the end of para (3), "so as to ensure that sufficient mobile and availability and capacity across the WNDA throughout the construction and operation periods"
Site Preparation and Clearance (Schedule 3)	<ul style="list-style-type: none"> (a) Insert that Cadw will be consulted on the Archaeological matters (b) As noted above, request AIL scheme is moved to PW7 and applies project wide
SPC 7 & 8 (Archaeology)	<p>Excavation Works undertaken to date - these Requirements are not triggered until commencement and so will not secure the necessary post excavation work in respect of excavation work undertaken to date. The Requirements will therefore not avoid the substantial harm identified in the ES and evidence. See WG's representations on this in this D7 note.</p> <p>Future Excavation Works - WG requests the drafting includes reference to an "Archaeological Mitigation Scheme" (including phasing triggers and timetable) in addition to a Written Scheme of Investigation and that such WSI shall update and build upon the existing WSI. This will assist for clarity in view of the potential for change of personnel, the length of time since the existing WSI was produced and the significant features and areas identified. A mitigation scheme is required as the WSI will relate more to methodology. This approach will ensure consistency with Requirement WN1 which refers to both an Archaeological Mitigation Scheme and WSI.</p>
SPC13 (Restoration Scheme)	<ul style="list-style-type: none"> a) Only SPC1 to SPC 13 apply to Work No.12. This is acceptable if the definition of Work No.12 is amended as requested above b) The acceptability of the restoration provisions is subject to a suitable "financial standing" test being satisfied/ acceptable security being provided prior to commencement. HNP has proposed inclusion of a financial standing test in the DCO. We will review and provide comments once received. We understand IACC is seeking security in respect of restoration as per the approach adopted in the section 106 agreement relating to the SPC planning application.
Restoration (new Requirement)	<p>As noted by WG at the ISH, there is currently a gap in the restoration provisions between restoration following Work 12 and full decommissioning of the power station should operations cease. Works undertaken beyond Work No.12 currently do not need to be restored if the project ceases and does not become operational. These works could include extensive excavation works prior to first pour of nuclear concrete. WG therefore considers a wider restoration provision to be necessary should works cease prior to first nuclear construction (as would be included for any minerals or fracking scheme involving similar excavation). Whilst WG recognises that substantial financial commitments will be triggered by "Implementation" under the section 106 agreement and that commercially the undertaker will wish to ensure it is in a position to proceed with the project at that point, the scenario cannot be ruled out (indeed the section 106 agreement also provides for such financial commitments to be suspended after Implementation if the project ceases). If HNP is confident that this scenario is unlikely to arise then there should be no issue in giving this commitment.</p>

DCO Ref	Issue
WN1(3)(a) (Main Power Station – Archaeology)	WG's comments in relation to the existing archaeological excavation work undertaken to date are set out separately in this D7 note. In respect of future archaeological works, see Schedule 21 comments below.
WN1(3)(b) (AIL)	WG welcomes inclusion of an Abnormal Indivisible Load (AIL) scheme. As noted above, WG considers this should be moved to PW7 as it should apply project wide (including in respect of Work No.12, should this become necessary) as opposed to just the main power station site.
WN18 (Site Health Facility)	Request inclusion of Betsi Cadwaladr Health Board as a consultee on this (either here or Schedule 21).
PR1 and PR5	WG requests that the Dalar Hir sub CoCP, PR1 and PR5 secures and controls 900 long stay parking spaces and 1,000 spaces for daily commuters. PR5 should be amended to add this, in addition to limiting to 1,900 spaces overall. See WG Rep5-080 in support of this.
PR3 (Dalar Hir detailed design)	Insert at the end of PR3(1) "in consultation with the Welsh Government". This is because if a revised design is taken forward (as opposed to the design secured by PR2), then WG wishes to ensure this design will not impact on the slip road/ strategic highway, in particular that traffic will not back up on the slip road
LC1 (Logistics Centre) (Action Point 26)	<ol style="list-style-type: none"> 1. WG requests inclusion of a requirement for a landscaping masterplan so as to mitigate heritage assets to be produced for the Logistics Centre as this is currently missing. 2. Insert a new 2(c) requiring a "Landscaping and Screening Scheme". This is because Logistics Centre will adversely impact on a heritage asset (Standing stone and burial chamber), including lighting <p>Sub-para (4)/ Schedule 21 - insert that Cadw should be consulted on the schemes to be submitted to IACC</p>
Schedule 19(4) (Appeals)	<p>This is a major outstanding issue which was raised again at length by WG at the ISH on the DCO on 6 March 2019 as it continues to refer to the Secretary of State rather than the Welsh Government, despite repeated requests for this to be amended. HNP has stated that it does not resist this in principle and hasn't suggested it would be unlawful to name the Welsh Government. We cannot understand why it hasn't been amended as it is entirely appropriate for WG to be named as appeal authority in respect of requirements and it is unsatisfactory for the applicant to this question to be considered by the Secretary of State (which would require a positive amend to the submitted draft order) when this point is perfectly capable of being agreed between the parties.</p> <p>As noted by WG at the ISH, as far as WG is aware, this issue has only been considered in detail in respect of Swansea Bay (where WG was named as appeal authority in the DCO despite energy projects over 50MW being within the legislative competence of the SoS at that time) and in connection with this DCO examination.</p>

DCO Ref	Issue
Schedule 21 (Control Docs and Schemes)	<p>AIL Scheme – section 4.6 of the CoCP is not adequate as it merely refers to Regulations which in turn includes certain limited notice requirements in respect of AILs. However, WG wishes to see an AIL scheme agreed which deals with AIL's in a coordinated manner and minimises impacts. This is important in view of the number of AILs required and the potential impacts on highways and tourism, if they are not dealt with in a coordinated manner (in the context of the single lane crossing at Britannia Bridge and the potential for congestion during peak times by these large, slow moving vehicles)</p> <p>Archaeological Mitigation Scheme - WG considers that the drafting could be improved by including further detail around the requirements and expectations for the "Archaeological Mitigation Scheme". Section 12 of the CoCP is not considered fit for purpose. At the least, WG requests for clarity inserting "(including phasing, triggers and timetable)" and crucially that reference is also made to the existing WSI and recently produced post excavation evaluation reports so that regard is had to these and that this is appropriately updated. Cadw's expectation is that the WSI should be updated to reflect the recently produced post excavation evaluation reports in view of the fact that the WSI was produced over 1 year ago and prior to the excavations already undertaken. This will assist for clarity in view of the potential for change of personnel over the coming years and the level of significant features discovered.</p> <p>Logistics Centre, Construction Lighting Scheme – for clarity, Cadw to be named as consultee in view of impacts on heritage assets (see Action Point 12 following ISH on 7 March 2019)</p>

Post Hearing Note on CoCP and Dalar Hir Park & Ride Sub-CoCP

Comments on draft Code of Construction Practice (Rev 3.0) in respect of Transport

Para Ref/ New Para	Issue
3.2.3	Typo – update diagram to remove reference to WNMPOP
5.3.6 (Shuttle buses)	<p>A clearer commitment to use the additional park and share facilities (of WG and IACC, once available) shown at figure 5-1 is required, as follows:</p> <ul style="list-style-type: none"> a) Delete the first sentence starting "Horizon is confident..." and "However, ". This is a control document to go to contractors, not submissions so this wording is not appropriate and may discourage use of the Park and Share Facilities by contractors b) Amend "consider" to "incorporate and encourage the use of the Park and Share Facilities as part of the transport strategy so as to meet the targets at Table 5-1"; c) Delete "where demand exists" so presumption is these facilities must be used unless the Transport Engagement Group agrees it is not necessary at that time and the mode share targets at 5.1 will be met. Provision of the service will in part stimulate demand and good travel habits from all relevant locations need establishing early; <p>It is understood this is agreed in principle by HNP.</p>

Para Ref/ New Para	Issue
5.3.7 (Min emission standards)	Welsh Government would expect to see a stronger commitment to lower emission vehicles for a low carbon project of this nature, as Euro IV diesel engines are likely to be very outdated at the time of peak construction
5.4.10	Include reference to Welsh Government in respect of the strategic highway (A55)
5.7 (Car Sharing)	<p>WG has the following concerns:</p> <ul style="list-style-type: none"> a) The extent of commitment is only to "target" 2.0 people per vehicle in the peak construction year alone. b) WG would expect to see enforceable targets which apply throughout the construction period c) HNP has proposed and assumed in its Transport Assessment and Travel Plan a limit of an average of 3.0 people per vehicle parking at the WNDA. There was a detailed Travel Plan prepared with key assumptions/ proposals, yet many of these commitments appear not to currently be secured as part of the DCO and have been omitted from the CoCP. Clear enforceable commitments are required around this key assumption in the TA and ES and other Travel Plan commitments. WG is concerned that enforcing only an average may be problematic in practice, so clear parameters and controls are also required. d) Clear restrictions need to be included on the use of the car parking at the WNDA linked to car sharing
Travel Plan Commitments	As noted above, WG is currently unclear where the Travel Plan proposals which were submitted as part of the Transport Assessment are secured. If they are to be secured in the CoCP then these need incorporating. Omissions include, commitments relating to workers living within 600m of a bus stop and car share average of 3 people per vehicle (see above)
HGV's - New para (new 5.8.14)	Insert a clear absolute commitment preventing release of HGV's from the WNDA between the AM peak of 7am until 8.30am so as to prevent HGV's exacerbating congestion on the strategic highway (particularly crossing Britannia Bridge to the mainland during the AM peak). This should not cause an operational issue for HNP as it is for a short period only. <u>This is a key outstanding matter for WG</u>
5.8.4 (Exceptional Circumstances)	<ul style="list-style-type: none"> a) Some of the circumstances set out are not exceptional (eg the first bullet refers to traffic on the highway network causing delay) which makes the limits largely unenforceable b) These exceptional circumstances should not apply in respect of the limit requested above as a new para 5.8.14 in respect of empty HGV's in respect of the AM peak with should be absolute as it applies to a small window of time only

Para Ref/ New Para	Issue
5.10.9/ new 5.13 (Monitoring Measures)	<p>In addition to monitoring worker travel, a clear section in the CoCP also needs to be included in respect of HGV's and a requirement for an action plan to be agreed and implemented. WG requests a similar monitor and manage approach is adopted in respect of HGV's to reflect the approach adopted for workers. It is understood this is agreed in principle by HNP. Para 5.10.9 or a new 5.13 should include the following:</p> <ul style="list-style-type: none"> • Reference to HGV limits and commitments (including in respect of empty HGV's set out above and the logistics centre) • A plan should be prepared to achieve targets/ compliance and a list of HGV potential actions set out. <p>Para 5.10.9 should include reference to the Transport Engagement Group as strategic highway is also affected</p>
5.11.1 & 5.11.13 & 5.12 (Construction Traffic)	<p>Include reference to the following:</p> <ol style="list-style-type: none"> a) empty HGV's and compliance with restrictions set out above on this at new para 5.8.14; b) restrictions in respect of the Logistics Centre and delivery management in the CoCP
Other Associated Development (Sewerage Treatment Plant)	<p>WG has concerns and requests clarity over the controls under the DCO in relation to siting, odour and visual impact of Sewerage Treatment Plant on Cestyll Garden in view of the fact that there is no separate work number for these works. WG considers there to be a need for a specific additional DCO requirement on this in order to mitigate heritage impacts.]</p>

Dalar Hir Park & Ride Sub-CoCP

Key Points for the Welsh Government:

1. The document does not currently provide any control regarding the allocation of parking spaces. E.g. the 1,000 daily commuters and the 900-long stay parking. This is necessary as it is understood that the junction capacity analysis at J4 of the A55 has not modelled 1,900 daily vehicle movements, only 1,000.
2. Whilst the use of ANPR's is welcomed it is still not clear what physical security measures (e.g. barriers) will also be used, and the Sub CoCP should include a commitment to ensure that stacking will not take place on the A55 slip roads, and if this occurs remedial action will be undertaken.