



Wylfa Newydd Project

Statement of Common Ground between
Horizon Nuclear Power Wylfa Limited and
Fforwm Iaith Môn (FfIM)

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1 Introduction

1.1 Status of this SoCG

- 1.1.1 This Statement of Common Ground (hereafter referred to as the 'SoCG') has been developed as an iterative draft by Horizon Nuclear Power (hereafter referred to as 'Horizon') to reflect its understanding of Fforwm Iaith Môn's position expressed verbally at meetings or through correspondence and is to its knowledge an accurate reflection of agreed, disagreed and ongoing matters. At this stage however, it is not being submitted as an endorsed agreed draft with Fforwm Iaith Môn. Furthermore, some member organisations of Fforwm Iaith Môn have chosen not to participate in the process of developing this SoCG.¹
- 1.1.2 Horizon is continuing to work with Fforwm Iaith Môn to develop the draft to a status where it can be signed and submitted as a jointly agreed statement.

1.2 Purpose of this document

- 1.2.1 This SoCG is a 'live' document that has been prepared by Horizon following discussions with Fforwm Iaith Môn. It has been prepared in accordance with the guidance published by the Department of Communities and Local Government (hereafter referred to as 'DCLG Guidance')² and example SoCG documents provided on the Planning Inspectorate's website.³
- 1.2.2 The purpose of this SoCG is to set out agreed factual information about the application for development consent to be made by Horizon for the construction and operation of a new nuclear power station at the Wylfa Newydd Development Area (hereafter referred to as 'WNDA') together with on and off-site associated development (hereafter referred to as 'the Wylfa Newydd DCO Project').
- 1.2.3 Paragraph 58 of the DCLG Guidance states:
- "A statement of common ground is a written statement prepared jointly by the applicant and another party or parties, setting out any matters on which they agree. As well as identifying matters which are not in real dispute, it is also useful if a statement identifies those areas where agreement has not been reached. The statement should include references to show where those matters are dealt with in the written representations or other documentary evidence"*

¹ These include the Isle of Anglesey County Council (IACC) and Cymdeithas Yr Iaith Gymraeg (The Welsh Language Society). Further details are included in section 2.13-2.1.4 of this document.

² Planning Act 2008: Guidance for the examination of applications for development consent (March 2015) paragraphs 58 – 65
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/418015/examinations_guidance-final_for_publication.pdf

³ <https://infrastructure.planninginspectorate.gov.uk/application-process/example-documents/>

- 1.2.4 The aim of this SoCG is to therefore provide a clear position of the state and extent of discussions and agreement between Horizon and Fforwm Iaitth Môn on matters relating to the Wylfa Newydd Project as at 19 February 2019.
- 1.2.5 DCLG Guidance recognises and expects that SoCG's will continue to evolve in the lead up to and during the examination period (if deemed necessary through on-going discussions between the parties). This SoCG is being submitted as a final draft, however in recognition that work started later on this SoCG than with other parties (as it was prepared following a request from the Examining Authority) it has not been possible to develop full agreement between the parties on the issues.
- 1.2.6 Although it is recognised that the date for the submission of final SoCGs is Deadline 6, discussions between Horizon and Fforwm Iaitth Môn will continue to seek to extend the areas of common ground and an update will be given to the Examining authority after this date, if appropriate.
- 1.2.7 This SoCG has been developed and informed by on-going meetings and discussions between Horizon and Fforwm Iaitth Môn (further details are provided in section 2 of this SoCG). Horizon met with Fforwm Iaitth Môn to discuss the SoCG on 14 December 2018 and the first draft of this SoCG was provided by Horizon on 21 January 2019, for input and comment by Fforwm Iaitth Môn.
- 1.2.8 This SoCG is submitted to the Examining Authority in relation to the application by Horizon under section 37 of the Planning Act 2008 (the Act) for an order granting development consent for the construction of the Wylfa Newydd DCO Project.

1.3 Description of Development

The Wylfa Newydd Project

- 1.3.1 The Wylfa Newydd Project includes:

The Enabling Works

- 1.3.2 The Enabling Works comprise the Site Preparation and Clearance Proposals (SPC Proposals) and the A5025 On-line Highway Improvements.
- 1.3.3 Horizon has submitted applications for planning permission for the Enabling Works under the Town and Country Planning Act 1990 to the Isle of Anglesey County Council (IACC) as local planning authority. The On-line Highway Improvements were granted planning permission on 13th July 2018 (ref: 27C106E/FR/ECON). The planning authority resolved to grant the SPC application subject to the signing of a legal agreement on the 5th September 2018. The Welsh Government wrote to the IACC on 13 December 2018 directing that the SPC application should be determined by the Welsh Ministers (referred to as a call-in). Horizon has now written to IACC and Welsh Government to confirm that it is withdrawing the SPC application and that all works included within the SPC application have also been applied for as part of the DCO application.

- 1.3.4 In order to maintain flexibility in the consenting process for the Wylfa Newydd DCO Project, the SPC Proposals have also been included in the DCO application. The A5025 On-line Highway Improvements are not part of the DCO application.

The Wylfa Newydd DCO Project

- 1.3.5 The Wylfa Newydd DCO Project comprises those parts of the Wylfa Newydd Project which are to be consented by a DCO, namely:

The Nationally Significant Infrastructure Project (NSIP)

- **Power Station:** the proposed new nuclear power station, including two UK Advanced Boiling Water Reactors, the Cooling Water System, supporting facilities, buildings, plant and structures, radioactive waste and spent fuel storage buildings and the Grid Connection;
- **Other on-site development:** including landscape works and planting, drainage, surface water management systems, public access works including temporary and permanent closures and diversions of public rights of way, new Power Station Access Road and internal site roads, car parking, construction compounds and temporary parking areas, laydown areas, working areas and temporary works and structures, temporary construction viewing area, diversion of utilities, perimeter and construction fencing, and electricity connections;
- **Marine works comprising:**
 - Permanent Marine Works: the Cooling Water System, the Marine Off-loading Facility, breakwater structures, shore protection works, surface water drainage outfalls, waste water effluent outfall (and associated drainage of surface water and waste water effluent to the sea), fish recovery and return system, fish deterrent system, navigation aids and Dredging;
 - Temporary Marine Works: temporary cofferdams, a temporary access ramp, temporary navigation aids, temporary outfalls and a temporary barge berth;
- **Off-site Power Station Facilities:** comprising the Alternative Emergency Control Centre (AECC), Environmental Survey Laboratory (ESL) and a Mobile Emergency Equipment Garage (MEEG); and

Associated Development

- the Site Campus within the Wylfa Newydd Development Area;
- temporary Park and Ride facility at Dalar Hir for construction workers (Park and Ride);
- temporary Logistics Centre at Parc Cybi (Logistics Centre);
- the A5025 Off-line Highway Improvements;

- wetland habitat creation and enhancement works as compensation for any potential impacts on the Tre'r Gof Site of Special Scientific Interest (SSSI) at the following sites:
 - Tŷ Du;
 - Cors Gwawr;
 - Cae Canol-dydd

1.3.6 The Power Station will be operational for approximately 60 years after which it will be decommissioned. The buildings will be removed from the site and all spent fuel and radioactive waste managed. The end state of the site will be agreed with the regulators.

Licensable Marine Activities

1.3.7 The Licensable Marine Activities comprise the Marine Works and the Deep Disposal (i.e. the disposal of material from dredging at the Disposal Site at Holyhead North). The Licensable Marine Activities will be consented under a Marine Licence; however, the Marine Works would also be consented under the DCO.

1.3.8 A more detailed description of development is contained at Chapter 4 of the Planning Statement [APP-406].

2 Consultation with Fforwm Iaith Môn

- 2.1.1 During the Issue Specific Hearing on DCO held on 24 October 2018, the Examining Authority encouraged Horizon to develop a SoCG with community organisations which represent the Welsh language and had submitted a Relevant Representation.
- 2.1.2 Following liaison with IACC and Gwynedd Council regarding the community organisations identified by Horizon, it was agreed that it would be more appropriate for Horizon to develop a SoCG with Fforwm Iaith Môn, a multi-organisation partnership, with a single purpose of increasing the number of Welsh speakers and the overall use of the Welsh language on Anglesey.
- 2.1.3 The following organisations have provided input into the SoCG via Fforwm Iaith Môn:
- Menter Iaith Môn (Anglesey Language Enterprise);
 - Menter Môn;
 - Medrwn Môn;
 - Urdd Gobaith Cymru, Ynys Môn (The Urdd Welsh Youth Organisation);
 - Clybiau Ffermwyr Ifanc Ynys Môn (Anglesey Young Farmers' Clubs);
 - Unllais;
 - Canolfan Dysgu Cymraeg Gogledd Orllewin (North West Learn Welsh Centre); and
 - Mudiad Meithrin.
- 2.1.4 Fforwm Iaith Môn includes representatives from other organisations, these have not provided input into the SoCG. Cymdeithas yr Iaith have expressed that they do not wish to provide input into the SoCG with Horizon and therefore this SoCG does not represent the views of Cymdeithas yr Iaith. IACC are also represented on Fforwm Iaith Môn, but elected not to contribute to this SoCG as Horizon has developed a separate SoCG with it.
- 2.1.5 It is worth noting that Menter Iaith Môn is also a member of the Welsh Language Impact Assessment Steering Group (see Welsh Language Impact Assessment [APP-432] for more detail).
- 2.1.6 Engagement with Fforwm Iaith Môn to develop the SoCG has been during the examination period of the DCO application.
- 2.1.7 The preparation of this draft SoCG has been informed by discussions within meetings between Horizon and Fforwm Iaith Môn and written feedback provided by Fforwm Iaith Môn on the measures set out in the WLCMES.

Meeting schedule

- 2.1.8 Horizon met with Fforwm Iaith Môn to discuss and document common ground on the following dates **Error! Reference source not found..**

Table 2-1 Fforwm Iaith Môn meeting schedule: SoCG

| Meeting date | Attendees | Purpose of meeting |
|------------------|-----------------------------|--------------------------------------|
| 14 December 2018 | Horizon Fforwm Iaith Môn | Introduction to the approach to SoCG |
| 28 January 2019 | Horizon Fforwm Iaith Môn | Discuss draft version of SoCG |

- 2.1.9 Horizon has engaged with Fforwm Iaith Môn at various stages of the process of developing the WLCMES. Horizon presented an update with regards to the development of the WLCMES during Fforwm Iaith Môn meetings in May 2017, November 2017 and January 2018.
- 2.1.10 Horizon has also engaged with members of Fforwm Iaith Môn, including Urdd Gobaith Cymru Ynys Môn, Mudiad Meithrin, Menter Iaith Môn, Canolfan Dysgu Cymraeg Gogledd Orllewin, IACC and Clybiau Ffermwyr Ifanc Ynys Môn, when developing the WLCMES. Each of these organisations were invited to a stakeholder workshop (October 2016) which contributed to the development of the draft mitigation and enhancement measures (see Welsh Language Impact Assessment [APP-432] for more detail). Horizon has valued the input of Fforwm Iaith Môn during the development of the WLCMES and considers that this collaborative process has strengthened the mitigation and enhancement measures considerably.
- 2.1.11 Furthermore, two of Fforwm Iaith Môn's member organisations - IACC and Menter Môn – were members of the WLIA steering group throughout the process of developing the principles of WLCMES from June 2016 onwards.

Comments provided by Fforwm Iaith Môn

- 2.1.12 Fforwm Iaith Môn provided comments on the dates in Table 2-2.

Table 2-2 Comments provided by Fforwm Iaith Môn

| Date | Consultation |
|-----------------|---|
| August 2018 | Relevant representations |
| 15 January 2019 | Fforwm Iaith Môn comments on WLCMES to inform first draft of SoCG |
| 30 January 2019 | Fforwm Iaith Môn comments on 1 st draft of SoCG to update Fforwm Iaith Môn position. |

- 2.1.13 The comments made by Fforwm Iaith Môn during January 2019 have informed the content of this SoCG.

3 Current Position

3.1 Current position with this SoCG

- 3.1.1 Horizon has engaged proactively with the Fforwm Iaiith Môn to develop this draft SoCG. Details of this engagement are set out in Table 3.1.
- 3.1.2 This SoCG has been developed by Horizon to reflect its understanding of Fforwm Iaiith Môn's position (at 19th February 2019) expressed verbally at a meeting (14th December 2018), or through correspondence (including PAC2, PAC 3 and Relevant Representations) but mainly written comments received on 15th January 2019, and is to its knowledge an accurate reflection of agreed, disagreed and ongoing matters.
- 3.1.3 A meeting was held between Horizon and Fforwm Iaiith Môn on the 28th January 2019 to discuss the first draft of this SoCG. Fforwm Iaiith Môn provided comments on the first draft and these have been incorporated in the final draft which is being submitted at Deadline 6 (19th February 2019). However, recognising that work started later on this SoCG than with other parties (as it was prepared following a request from the Examining Authority), it has not been possible to develop full agreement between Horizon and Fforwm Iaiith Môn on many of the issues raised during the process..
- 3.1.4 Although it is recognised that the date for the submission of final SoCGs is Deadline 6, discussions between Horizon and Fforwm Iaiith Môn will continue to seek to extend the areas of common ground and an update will be given to the Examining authority after this date, if appropriate. Horizon considers that many of the issues raised by Fforwm Iaiith Môn during the development of the SoCG will help inform the process of implementing the mitigation and enhancement measures.

3.2 Position of Horizon Nuclear Power and Fforwm Iaiith Môn

- 3.2.1 The following schedule sets out matters by topic area and an indication of whether the issue is agreed (green) or not agreed (red).
- 3.2.2 Fforwm Iaiith Môn welcome the principle of some mitigation and enhancement measures in the Welsh Language and Culture Mitigation and Enhancement Strategy (Appendix B4-1 of the Welsh Language Impact Assessment) [APP-428], those being SoCG issue reference FfIM 009, 010, 013, 016, 017, 026 and 028, however, disagree with the level of detail provided by Horizon in relation to the scope and implementation of the measures.

Table 3-1 Statement of Common Ground between the Fforwm Iaitn Môn and Horizon

Welsh language and culture mitigation and enhancement measures

| Topic | Sub-issue | SoCG reference number | Document Reference/Signpost/Routemap | Fforwm Iaitn Môn Position | Horizon Position | RAG | Further actions required to progress discussion on the issue |
|--|---|-----------------------|--|--|---|------------|--|
| General statement in relation to Welsh language and culture | Strategaeth Iaitn Gymraeg 2016 – 2021 Ynys Môn (Anglesey Welsh Language Strategy 2016-2021) | FfIM 001 | Welsh Language Impact Assessment Report (APP-428) (Appendix B4-1 Welsh Language and Culture Mitigation and Enhancement Strategy) | <p>Partners of Fforwm Iaitn Môn have committed themselves to the Isle of Anglesey Language Strategy⁴ to increase the percentage of Welsh speakers on Anglesey to 60.1% by the 2021 Census. Starting from a situation of there being 57% of Welsh speakers in the 2011 census, and an ongoing county and government strategy coupled with regular financial investment in order to reach the target of 60.1%, any mitigation measure must accord with the Forum's commitments to achieve these targets.</p> <p>As a result of the development of Wylfa Newydd, the challenge of increasing this percentage beyond 2021 intensifies.</p> <p>As a starting point, the basic target of any programme of language mitigation measures by developers should ensure that Anglesey reaches the target of 60.1% Welsh speakers. We do not feel that the measures below reflect the linguistic targets of Anglesey.</p> | <p>Horizon fully embraces the importance of Welsh language and culture to the communities of Anglesey and North Wales. Horizon is committed to supporting and enhancing Welsh language and culture across all aspects of the Wylfa Newydd Project throughout its duration, including through the development of measures to mitigate adverse effects and enhance beneficial ones. Schedule 1 of the draft DCO s.106 agreement (shared with Welsh Government and IACC on 23 January 2019) secures mitigation with regard to the Welsh language and culture.</p> <p>Horizon appreciates the complexity of socio-linguistic change and that a range of factors that can affect the profile of language ability, acquisition, transmission, use and learning within a population. For this reason, Horizon has developed a suite of measures that provide specific commitments to mitigate effects on the Welsh language and culture as well as flexibility to adapt based on regular monitoring processes. The measures developed have been secured through the draft DCO s.106 agreement (shared with Welsh Government and IACC on 23 January 2019) and include specific commitments as well as contingency funds.</p> <p>Horizon appreciates the contribution made by key local and national stakeholders in supporting the Welsh language and culture in Anglesey and north Wales and has been working in partnership with many local community organisations since 2013 to deliver a range of activities related to the Welsh language. Building on these links, Horizon has sought to engage with key stakeholders throughout the process of developing its Welsh language and culture mitigation and enhancement measures.</p> <p>Horizon acknowledges the national and local language strategies and where possible, seeks to support the Isle of Anglesey County Council and partners of Fforwm Iaitn Môn in achieving the aims of those strategies. Horizon considers that the Wylfa Newydd Project can play a role in supporting many of these aims such as reducing the outward migration of young people and increasing the number of children accessing Welsh-medium education. The focus of mitigation and enhancement measures workshops reflected the key themes of Anglesey's Welsh Language Strategy (which in turn reflects Welsh Government strategy, i.e. a million Welsh speakers by 2050) and the Anglesey detailed Welsh Language Plan (which is updated on an annual basis). Horizon considers that the WLIA (including the</p> | Not Agreed | |

⁴ <https://www.ynysmon.gov.uk/Journals/q/b/n/Strategaeth-Iaitn-Gymraeg-2016-2021.pdf>

| Topic | Sub-issue | SoCG reference number | Document Reference/Signpost/Routemap | Fforwm Iaitth Môn Position | Horizon Position | RAG | Further actions required to progress discussion on the issue |
|-------|---|-----------------------|--|--|---|------------|--|
| | | | | | Welsh Language and Culture Mitigation and Enhancement Strategy) gives appropriate consideration to adopted national and local language strategies as set out in Section A.2, Volume A of the WLIA [APP-432]. | | |
| | Risk to undermining years of investment in the Welsh language | FfIM 002 | Welsh Language Impact Assessment Report (APP-428) (Appendix B4-1 Welsh Language and Culture Mitigation and Enhancement Strategy) | Fforwm Iaitth Môn note that Horizon is seeking UK Government public financial support for the Wylfa Newydd DCO Project, in order to meet the energy needs of the UK. A project partly funded by the UK Government should not undermine years of vast investment in the Welsh language from Welsh Government by Menter Môn, Menter Iaitth Môn, Mudiad Meithrin, y Ganolfan Dysgu Cymraeg, Medrwn Môn, yr Urdd, Young Farmers' Clubs and Unllais | See Horizon response to FfIM 001. The measures developed in the Welsh Language and Culture Mitigation and Enhancement Strategy and secured in the Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019) have been developed through consultation with key stakeholders from 2016 onwards. This includes engagement with the WLIA steering group (which includes representatives of Welsh Government, IACC and Menter Iaitth Môn), stakeholder workshops (including representatives from WLIA steering groups members as well as Urdd Gobaith Cymru, Y Ganolfan Dysgu Cymraeg, Wales Young Farmers' Clubs). | Not Agreed | |
| | Level of detail in Welsh Language and Culture Mitigation and Enhancement Strategy | FfIM 003 | Welsh Language Impact Assessment Report (APP-428) (Appendix B4-1 Welsh Language and Culture Mitigation and Enhancement Strategy) | The is a strong and unanimous feeling by members of Fforwm Iaitth Môn that the ' Description of the Measure ' in relation to the 24 mitigation measures within the WLCMES (Appendix B4-1 of the WLIA) [APP-428] is a series of aspirational statements. Whilst the principle of the measures is welcomed in some cases, there is a clear opinion amongst the members that much more detail was required than what is proposed and that a measurable strategy (SMART) is required, which has been quantified in terms of impact, time and resources, and that clear targets have been identified. | Schedules 1, 4 and 6 of the Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019) includes obligations relating to the measures in the WLCMES. These include specific financial contributions, contingency funds, commitments to employ officers and requirements relating to the content of Horizon's Welsh Language Policy. The Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019) also sets out how the financial contributions and contingency funds will be managed and payments triggered, based on agreed monitoring mechanisms and governance arrangements. Commitments to ongoing monitoring and annual evaluations are also included in the draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019). | Not Agreed | |
| | Level of detail within assessment | FfIM 004 | Welsh Language Impact Assessment Report (APP-428) (Appendix B4-1 Welsh Language and Culture Mitigation and Enhancement Strategy) | The documents published in connection with the Welsh Language Impact Assessment do not offer, far from sufficiently detailed data on the effects on the communities of Anglesey, e.g. there is no analysis of the impact of the immigration of school age children, or the impact on communities where Welsh is spoken by >70% and >50% of the population. Without this, it is impossible to introduce and implement meaningful and effective mitigation measures. Fforwm Iaitth Môn are of the view that quantitative data should be presented in different 'scenarios' e.g. worst, medium and best case 'scenarios'. Such scientific analysis needs to be included annually during the construction period, and during the operational period. A key matter also is that the measures do not measure the impact of the mitigation measures, and as part of a strategy this would have to be reviewed on a regular basis. | Horizon considers that the methodology and study areas used in the WLIA [APP-432] are appropriate to assess the effects of the Wylfa Newydd DCO Project on Welsh language and culture. The assessment presented in the WLIA considers a baseline of data collected and is included within the WLIA [APP-432]. The baseline has been reviewed by the Welsh Language Impact Assessment Steering Group and Horizon considers it to be robust. The WLIA methodology follows a recognised approach based on the 'Planning and the Welsh Language: The Way Ahead' (2005) document. This approach is commonly adopted in WLIAs including ones undertaken by IACC and other local authorities. The assessment has been based on a realistic worst-case scenario. | Not Agreed | |
| | Language Skills Strategy | FfIM 005 | Welsh Language Impact Assessment Report (APP-428) (Appendix B4-1 Welsh Language and Culture Mitigation and Enhancement Strategy) | A number of the measures relate to staffing issues. The members of Fforwm Iaitth Môn expressed a clear view that Horizon needed to produce a comprehensive Welsh | Horizon does not have a Welsh language skills strategy but considers that, when taken together, the commitments secured in the Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019) form the basis of a Welsh language skills strategy which would be | Not Agreed | |

| Topic | Sub-issue | SoCG reference number | Document Reference/Signpost/Routemap | Fforwm Iaitth Môn Position | Horizon Position | RAG | Further actions required to progress discussion on the issue |
|-------|--|-----------------------|--|--|---|------------|--|
| | | | | Language Skills Strategy that will detail appropriately on all these issues in a strategic and measurable way. | formalised as part of its updated Welsh Language Policy. This would form an important step in implementing a DCO. | | |
| | Provision of human resourcing | FfIM 006 | Welsh Language Impact Assessment Report (APP-428) (Appendix B4-1 Welsh Language and Culture Mitigation and Enhancement Strategy) | In order to carry out this strategic work (see FfIM 005) that includes monitoring, scrutiny and implementation at a multi-layered and broad community level, Fforwm Iaitth Môn believe it will be necessary to secure adequate human resources. The measures, as presented in the WLCMES (Appendix B4-1 of the WLIA) [APP-428], do not offer adequate human resources. | Horizon has developed the measures and obligations based on a robust evidence base. Funding for a number of key personnel that will support the delivery of the measures is secured through the Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019), including a Welsh Language and Culture Coordinator, Community Involvement Officers, Welsh Language Immersion Teachers, Welsh Language Officer, Economic Development Officers and Accommodation Officers. In addition to these commitments, contingency funds have been included in the Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019). | Not Agreed | |
| | Engagement of language planners | FfIM 007 | Welsh Language Impact Assessment Report (APP-428) (Appendix B4-1 Welsh Language and Culture Mitigation and Enhancement Strategy) | In order to achieve the suggestions set out in FfIM001-007, Fforwm Iaitth Môn strongly suggests that the expertise of language planners is secured to assist with the work. The situation facing small organisations on the Island is also unclear in light of the mitigation. Concern remains regarding the governance of the DCO s.106, the role of the smaller organisations, and the application process for investment for smaller organisations that will be substantially affected by the development of Wylfa Newydd. | Specialist linguistic planners have been appointed by Horizon as specialist linguistic planners, and their role included facilitating the workshops with key stakeholders and community groups, the feedback from which formed the basis for the WLCMES. The Specialist linguistic planners also acted as reviewers for the WLIA, including specific review of methodology and study areas. Community organisations will be able to apply to access the Community Fund secured in Schedule 12 of the Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019). In terms of early years provision, Schedule 6 of the Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019) notes that IACC may utilise the Education (Contingency) Fund for pre-school provision. | Not Agreed | |
| | Beneficial effects on Welsh language and culture | FfIM 008 | Welsh Language Impact Assessment Report (APP-428) (Appendix B4-1 Welsh Language and Culture Mitigation and Enhancement Strategy) | Fforwm Iaitth Môn acknowledge that there are some beneficial effects to be identified, but without definite commitments, it is possible that the work and investment of Mentrau, charities and organisations on Anglesey over decades could be undermined and counteracted. Fforwm Iaitth Môn's general comments in relation to Welsh language and culture set out in FfIM 001-008 are central to their position in relation to FfIM 009-032. | Horizon undertook a WLIA to assess the likely effects of the construction, operation and decommissioning stages of the Wylfa Newydd DCO Project against five key aspects of community life being: <ul style="list-style-type: none"> Population characteristics; Quality of life; Economic factors; Infrastructure supply and education; and Social and cultural aspects. The key findings of the WLIA including the positive and adverse effects of the project are detailed in the WLIA [APP-423] and as summarised in section 4 of the WLIA Non-Technical Summary (WLIA NTS) [APP - 430]. Horizon's view is that with mitigation – detailed throughout the WLIA and summarised in section 5 of the WLIA NTS [APP-430] – that the beneficial effects outweigh the adverse. | Not Agreed | |

| Topic | Sub-issue | SoCG reference number | Document Reference/Signpost/Routemap | Fforwm Iaitn Môn Position | Horizon Position | RAG | Further actions required to progress discussion on the issue |
|---|--|-----------------------|--|--|--|------------|--|
| Mitigation and enhancement measures relating to the workforce | Measure 1 of WLCMES Appointment of a Welsh Language and Culture Co-Ordinator (WLCC) | FfIM 009 | Welsh Language Impact Assessment Report (APP-428) (Appendix B4-1 Welsh Language and Culture Mitigation and Enhancement Strategy) | <ol style="list-style-type: none"> 1. Fforwm Iaitn Môn welcomes the post – but there is not enough clarity here: 2. Strategy and targets: Fforwm Iaitn Môn cannot respond in full to the Strategy due to there being a lack of details, ambiguous words and lack of a definite commitment to a programme / time limits and concern remains regarding measurable targets that are to be achieved by the WLCC. 3. Job description: There is no job description to explain the aspects relating to internal, external responsibility, balance and objectivity, relationship with other languages. <ol style="list-style-type: none"> i. Internal: Concern remains regarding the influence of the WLCC within the company structure. ii. External: Concern remains regarding the influence of the WLCC on the WLIA Steering Group, the DCO s.106, the DCO s.106 expenditure after it has been transferred to the Local Authority, and the Management Group that monitors the Language Policy. iii. Balance: Concern remains regarding the balance of the role between the Employer (the developers) and the WLCC in carrying out the needs of the employer and representing the linguistic needs of the community. iv. Relationship with other languages: Concern remains regarding the WLCC's role in relation to other languages – neither English nor Welsh, and the need to meet the communication requirements of those workers. 4. Capacity. Concern remains that there is no team of staff to support the WLCC's work. It is not possible for one officer to mitigate the magnitude of the development's impact on the Welsh language. It is not realistic for the same officer to also be planning and supporting the 9,000 workers to assimilate in our Welsh-speaking communities. One officer does not offer capacity to monitor and support the impact of the influx of up to 9000 workers, especially considering percentages (B.4.22 of the WLIA [APP-432]) which undo years of Investment in terms of both time and money by organisations that are members of Fforwm Iaitn Môn. | <p>Horizon and Fforwm Iaitn Môn are in agreement with the appointment of a WLCC.</p> <p>The WLCC is a Horizon employee, and their role includes the implementation of the mitigation and enhancement measures, set out in the WLCMES. The WLCC works within the stakeholder engagement team and is managed by the Head of Strategic Development (Wales). The WLCC is a member of the WLIA Steering group and will be a member of the WLC Engagement Group as well as the Horizon internal WLC management group. The WLCC role is secured in Schedule 1 of the Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019) which notes that 'The Developer will employ a Welsh Language and Culture Coordinator from Implementation until the end of the Operational Period (or as otherwise agreed by the Parties).'</p> <p>In terms of the job description, Schedule 1 of the Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019) notes that for the duration of the Construction Period, the role is agreed to be:</p> <ol style="list-style-type: none"> (a) <i>to focus on the development and implementation of Welsh language and culture mitigation and enhancements;</i> (b) <i>to monitor, measure and evaluate language and culture related community benefit activities and associated mitigation measures;</i> (c) <i>to sit on and report to the Welsh Language and Culture Engagement Group;</i> (d) <i>to work closely with the Community Involvement Officers to deliver the Community Impact Joint Work Plan (as defined in Schedule 14); and</i> (e) <i>to assist the Council with the operation of the community translation service established in accordance with Paragraph [6] below.</i> <p>For the duration of the Operational Period, the Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019) notes that the WLCC role is agreed to be:</p> <ol style="list-style-type: none"> (f) <i>to contribute to annual reviews of the Welsh language policy;</i> (g) <i>to liaise with external partners, including local authorities and Welsh Government, on matters relating to the Welsh language;</i> | Not agreed | |

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| | | | | <p>5. Fforwm Iaitn Môn is accountable to the Isle of Anglesey Welsh Language Strategy, "Our vision for the 2021 Census is to see an increase in the number of Welsh speakers and that the percentage rises to at least 60.1% as it was in 2001. Through collaboration and taking practical steps, this is achievable."⁵</p> <p>Fforwm Iaitn Môn's target of increasing the percentage of Welsh speakers remains, but as the result of the impact of the Wylfa Newydd development, the scale of the task is huge, as the company's own assessment shows (point B.4.22 in the WLIA [APP-432]):</p> <ol style="list-style-type: none"> i. a drop of 17.2 percentage points in North Anglesey; ii. a drop of 2.0 percentage points in West Anglesey; iii. a drop of 1.5 percentage points in South Anglesey; iv. a drop of 0.5 percentage points on the Menai Mainland <p>As a result, there must be a strategy, structure and targets based on mitigating the impact on the percentage of speakers in order to see the efficacy of the post as a mitigation measure, and most importantly, staff to put this into action.</p> <p>6. The conclusion therefore is that much more evidence is needed to identify the magnitude of the post, and to weigh up the effectiveness of the post and identify gaps this post cannot fill, with an explanation of how the developer will carry out these additional functions.</p> | <p>(h) <i>to otherwise promote support the use of the Welsh Language in relation to the Wylfa Newydd DCO Project.</i></p> <p>The WLCC will not lead a team of staff but will work closely with Horizon education, training, HR, stakeholder engagement Community Involvement Officer (CIO) and supply chain staff.</p> | | |
| | Measure 2 of WLCMES Consideration of Welsh language skills needs of each post on the Project | FfIM 010 | Welsh Language Impact Assessment Report (APP-428) (Appendix B4-1 Welsh Language and Culture Mitigation and Enhancement Strategy) | <ol style="list-style-type: none"> 1. Fforwm Iaitn Môn welcome the Welsh language skills competency framework and assessment tool as well as the desire for 'possible external support' to put this into action. 2. There is no evidence of a Language Skills Strategy being in place. In the opinion of Fforwm Iaitn Môn, every post should be designated as bilingual (as default). By doing this it is then possible to identify posts that require International expertise where the Welsh language will not be essential/desirable in terms of recruitment. This would be one practical way of reflecting the written support of Horizon for | <p>Horizon and Fforwm Iaitn Môn are in agreement that Horizon will develop, in consultation with IACC and the Welsh Government, a Welsh language skills competency framework and assessment tool as secured in Schedule 1 of the Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019), which notes that this framework and tool will:</p> <ul style="list-style-type: none"> • utilise the emerging Welsh Government Diagnostic Toolkit (being produced by the National Centre for Learning Welsh); • follow the Council's 5-level workplace Welsh Language Skills Strategies document | Not agreed | |

⁵ <https://www.ynysmon.gov.uk/Journals/q/b/n/Strategaeth-Iaitn-Gymraeg-2016-2021.pdf>

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| | | | | <p>the Welsh language. In relation to a substantial percentage of the posts, if bilingualism is made essential or desirable, it is possible to secure a workforce that appreciates and is willing to use its Welsh language skills in the workplace or to learn/increase confidence in their use of the Welsh language. We refer to the good practice of major local employers such as North Wales Police, Bangor University, Betsi Cadwaladr Health Board, and IACC for expertise in this field.</p> <p>3. Concern remains that there is no confirmation to commit to occupational levels (which vary in terms of speaking, reading, writing, confidence and fluency), similar to the ones used by IACC / North Wales Police in this field.</p> <p>4. Concern remains regarding the lack of time commitment to establish the Framework and Assessment Resources which would then be available to submit comments on. The Forum expects that there will be consultation with and guidance from the Welsh language Commissioner regarding good practice.⁶</p> <p>5. Fforwm Iaith Môn request confirmation that the WLIA Steering Group will have input and influence on this.</p> <p>6. Fforwm Iaith Môn request more information regarding the language standards that are required during the Construction phase compared to what will be required during the operational phase. To invite input from the National Welsh Learners' Centre (Y Ganolfan Dysgu Cymraeg Cenedaethol) to consult and provide training.</p> <p>7. It appears that Horizon requires guidance on how to draw up a Language Skills Strategy as there is no evidence of a strategy and structured training scheme at present: "At the moment we do not offer specific provision to help staff improve their Welsh language skills. However, we are expanding towards including Welsh language skills in our management and staff</p> | <ul style="list-style-type: none"> • 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]; • identify periodic timings for updates in consultation with the Council and the Welsh Government, • and the Developer will thereafter implement the Welsh language skills competency framework and assessment tool until the end of the Operational Period (or as otherwise agreed by the Parties). <p>The Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019) notes that Horizon will establish a Welsh Language Policy from commencement until the end of the Operational Period where that policy will contain and require:</p> <ul style="list-style-type: none"> • Details on what types of internal communications will be made available bilingually. • Public-facing permanent and temporary signage on the Sites relating to the Wylfa Newydd DCO Project are bilingual (save where safety or other material considerations require that signage is in English only). • Provision of language and culture awareness training to the Workforce. • Staff members to demonstrate linguistic courtesy and awareness of the Welsh Language Policy. • Development of a programme of Welsh language training for the Workforce operational staff where this is a relevant requirement within a job-role (as determined by the Welsh language skills competency framework established pursuant to Paragraph [Error! Reference source not found.]). • Establishment of a Welsh language mentoring scheme for learners. • Maintenance of the Developer's Welsh speaker badge scheme and using reasonable endeavours to ensure that its contractors operate an equivalent scheme. • Ensure a Welsh-speaking member of staff is included on interview panels for jobs where candidates are required to have Welsh language skills. • An annual review of the policy. | | |

⁶[http://www.comisiynyddygydraeg.cymru/Cymraeg/Rhestr%20Cyhoeddiadau/20160308%20%20GC%20%20Cyngor%20Recriwtio%20-%20CYMRAEG%20\(T\).pdf](http://www.comisiynyddygydraeg.cymru/Cymraeg/Rhestr%20Cyhoeddiadau/20160308%20%20GC%20%20Cyngor%20Recriwtio%20-%20CYMRAEG%20(T).pdf)

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| | | | | <p>training processes in the future.” (Point 6.2: Horizon Welsh Language Policy)</p> <p>8. Fforwm Iaith Môn request confirmation that Horizon will continue to advertise all posts bilingually (both in Wales or outside Wales), that the application documents for all posts are bilingual, and the opportunity to apply and be interviewed through the medium of Welsh without disadvantage.</p> <p>9. Fforwm Iaith Môn identifies the danger of the language being degraded if Welsh is only heard in the manual labour sector within the workplace, without the language being heard every day from more specialist engineers and managers. Fforwm Iaith Môn requests confirmation that Horizon will be able to support bilingual Welsh/English senior managers to deal with technological vocabulary in both languages and set an example by raising the status of the language in the workplace by speaking it professionally.</p> <p>There are advantages to Horizon having managers who can speak Welsh – ‘Speakers cannot express themselves adequately in one language, so switch to the other to make good the deficiency. This tends to happen when the speaker is upset, tired, or otherwise distracted...Switching to a language is very common as a means of expressing solidarity with a social group...and a degree of rapport is established.’ (page.414, 2006) and “If we know we are being overheard by our seniors we may well alter the way we speak.” (page 325,2006) ⁷</p> <p>10. Confirmation is needed that the company’s sub-contractors will place emphasis on recruiting bilingual staff. We suggest that the principles regarding use of the Welsh language be made clear in the Workforce Code of Conduct and the Language Policy to which the sub-contractors will be signing up.</p> | <p>The Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019) notes that Horizon will typically notify all external vacancies to the Wylfa Newydd Employment and Skills Service (WNESS) which will publicise them in Welsh and English. It also notes that, where Horizon or its contractors advertise any such vacancies separately from the WNESS Horizon will require that they are advertised in Welsh and English through local and national recruitment channels that engage with a Welsh-speaking audience.</p> <p>The Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019) notes that Horizon will include a Welsh speaker on interview panels for job applicants whose preferred language is Welsh, provided that where the job role demands English language skills, those skills will also be considered in such interview process.</p> <p>The Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019) includes several obligations which, when taken together, would raise the status of the Welsh language in the workplace - language awareness training, Welsh language skills training programme, the Welsh language skills and competencies framework, bilingual signage, a Welsh language mentoring and Welsh speaker badge scheme.</p> <p>Horizon does not have a Welsh language skills strategy but considers that, when taken together, the commitments above form the basis of a Welsh language skills strategy which would be formalised as part of its updated Welsh Language Policy.</p> <p>In terms of contractors, the Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019) further notes that, prior to contractors commencing work on sites, Horizon will provide its contractors with:</p> <ul style="list-style-type: none"> • information on the Horizon’s Welsh Language Policy and obligations in this [Error! Reference source not found.] and the contractors’ role in delivering such policy and obligations including for example via their recruitment processes and internal and external communications; • Information on local suppliers including the business database being developed by IACC, other local authorities, North Wales Economic Ambition Board and Welsh Government; and • any other materials agreed by the Developer and the Council. <p>The Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019) notes that, as part of the induction process for the Workforce operating on the Site, the Horizon</p> | | |

⁷ How Language Works, David Crystal 2006

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| | | | | | <p>will provide the Workforce attending such site induction(s) with the following Welsh language materials to raise awareness of and respect for the Welsh language and culture, and Welsh speaking among the contractors and the Workforce:</p> <ul style="list-style-type: none"> • Welsh language briefing packs and/or induction materials; • the "Byw mewn gwlad ddwyieithog/Living in a bilingual nation" Welsh Language booklet produced by the Welsh Government dated 2017; • any other materials agreed by the Developer and the Council. <p>To enable facilitate the implementation of the above obligations, Horizon will include Welsh language information requirements as an agenda item for all relevant contractor meetings.</p> | | |
| | <p>Measure 3 of WLCMES Ensure Welsh language capacity for interviewing staff</p> | <p>FfIM 011</p> | <p>Welsh Language Impact Assessment Report (APP-428) (Appendix B4-1 Welsh Language and Culture Mitigation and Enhancement Strategy)</p> | <ol style="list-style-type: none"> 1. See FfIM 010. There is no Language Skills Strategy to scrutinise, but it is expected that the majority of the posts will require bilingual skills to be essential or desirable. 2. Horizon Recruitment staff should be bilingual in order to be able to deal with the entire workforce, and if a member of an appointment panel is not a Welsh speaker, then a professional translator should be obtained to translate the applicant's answers that are given in Welsh, for the panel member. 3. Without favour or disadvantage, in terms of equal opportunities, it should be communicated clearly that the applicant has the right to be interviewed in Welsh, with one question in English to assess communication skills in English. This aspect is especially important as we see your young apprentices as leaders of the industry in the future and so maintaining their bilingual skills throughout their employment is very important. <p>The need for this is highlighted in the report entitled 'Language, Employment and Bilingual Services – Report of the Welsh Language and Local Government Working Group' ('Iaith, Gwaith a Gwasanaethau Dwyieithog – Adroddiad Gweithgor yr Iaith Gymraeg a Llywodraeth Leol'), 2016. The current lack of progression is demonstrated between the various education periods and the world of work which means that individuals who have received Welsh-medium education or who have learnt Welsh at school often lose their skills.</p> | <p>The assessment of Welsh language skills requirements will be driven by the use of the Welsh language skills competency framework and assessment tools secured in Schedule 1 of the Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019).</p> <p>The Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019) notes that Horizon will include a Welsh speaker on interview panels for job applicants whose preferred language is Welsh, provided that where the job role demands English language skills, those skills will also be considered in such interview process.</p> <p>The Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019) also notes that Horizon will provide relevant recruitment managers with training to use the Welsh language skills competency framework and assessment tool to determine the language requirements of construction and operational roles, record this information and include it within the advertised job profile.</p> | <p>Not agreed</p> | |

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| | | | | <p>The Welsh Government and Local Authorities have responsibility to ensure that does not happen, for the sake of the individuals' personal development and for the benefit of the Welsh economy. To help normalise the use of Welsh and to ensure that Welsh language skills are appreciated by employers, there is a need to create an environment in which staff and the public feel more confident and safer when trying out their Welsh language skills, and to ensure that Welsh language skills are appreciated by employers.</p> <ol style="list-style-type: none"> 4. All posts, whether specialist or not, should be advertised in publications in Wales. 5. The adverts should be bilingual referring to the fact that there will be an assessment of both languages during the interview. 6. The text in the description template of any Horizon posts should include a reference to the importance of the Welsh language in the workplace and the community. Referring also to the opportunity to learn Welsh in the workplace when the language is not essential for the post. 7. Once again, we request confirmation regarding the procedure in relation to language skills levels to be used by Horizon. 8. Fforwm Iaith Môn note that Horizon expects Investment from the Government and so we emphasise the need to offer equal opportunities to Welsh speakers and to include consultation with and use of the expertise of the National Welsh Learners' Centre and the Welsh Language Commissioner in establishing the Language Skills Strategy. <p>Canolfan Dysgu Cymraeg Cenedlaethol (National Welsh Learners' Centre) – A Centre that takes advantage of the expertise of experienced and leading staff nationally and which has developed a structured and effective programme for adult Welsh learners. There is a need for a scheme that identifies the appropriate courses and the progression from Welsh for Beginners, Discovering Wales and the Welsh Language, to Beginners' level for business, for parents and leading to higher courses. Also, it would be useful to identify the emphasis on communication or using information</p> | | | |

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| | | | | <p>technology in Welsh, language awareness, working bilingually, developing confidence and using Welsh in the Workplace.</p> <p>As well as the Welsh Government's Cymraeg 2050 targets and the 'Iaith Fyw Iaith Byw' 2012 - 2017 before that, The Welsh Learners' Centre as well as other members of Fforwm Iaith Môn operated on the basis of National policies and strategies on the Welsh language such as the Well-being of Future Generations Act (Wales) 2015, the Moving Wales Forward Strategy 2016-2021, Welsh Language Measure (Wales) 2011.</p> <p>Fforwm Iaith Môn also request an explanation regarding how Horizon will convey the language requirements to their sub-contractors and to those sub-contractors as well. We emphasise that it is essential for the sub-contractors to have staff that can deal with the public bilingually in our communities.</p> | | | |
| | <p>Measure 4 of WLCMES</p> <p>Continue to distribute information on job opportunities to young people</p> | <p>FfIM 012</p> | <p>Welsh Language Impact Assessment Report (APP-428) (Appendix B4-1 Welsh Language and Culture Mitigation and Enhancement Strategy)</p> | <ol style="list-style-type: none"> 1. Fforwm Iaith Môn welcomes the use of Welsh speakers as role models for Young people. 2. The provision of fully bilingual resources, including technical documents the applicant can use to refer to standard terminology in Welsh, is to be welcomed. <p>For a number of pupils, it is possible that this contract with Horizon will be their first contract with the Engineering/scientific industry. We therefore emphasise the need for your team to provide presentations in the Welsh language where Welsh is the language of the pupils' education, in accordance with the educational requirements of the school/College and an opportunity to develop the bilingual experiences of young people.</p> <p>"The problem is in the associations that accompany teaching Science and Mathematics through a majority language such as English. Scientific culture is seen as Anglo-American, and an increased status is given to the English language.... Is the hidden message that, the minority language is not up-to-date, isn't capable of scientific and mathematical usage, hasn't the vocabulary to enable scientific and mathematical teaching? Is the minority language therefore connected with history, culture, tradition, folk lore and heritage? Is the majority language connected with modernity, the high status and powerful aspects of Science and Technology? Does this</p> | <p>Horizon and the Fforwm Iaith Môn are in agreement that Welsh speakers and learners will be used as role models in promotional materials. This is secured in Schedule 1 of the draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019). Horizon and the Fforwm Iaith Môn are in agreement that educational and awareness raising materials and presentations about career opportunities (including technical terminology) are produced bilingually. Horizon's Education Programme Coordinator is a Welsh speaker and Horizon Futures educational materials are produced bilingually. Horizon and Fforwm Iaith Môn agree there are opportunities for Fforwm Iaith Môn member organisations to support Horizon to raise awareness about the career opportunities.</p> | <p>Not agreed</p> | |

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| | | | | <p>make one language more internationally valued and the other language less so? In Spain and Wales, for example, there have been movements to try to ensure that science teaching, science textbooks and science thinking can all operate in a minority language. Considerable attempts have been made to show that a minority language can adapt to being a modern language. New vocabulary needs inventing, sometimes providing extra meaning to a scientific concept, and other times borrowing from the English, Greek or Latin languages." (page 208,2014)</p> <p>Horizon has the opportunity to be innovative here in their use of the Welsh language in a specialist field.</p> <p>3. Fforwm Iaitn Môn see here a role for Fforwm Iaitn Môn also to support Horizon by disseminating the message about the availability of presentations in Welsh on careers or technology/engineering/science subjects for the island's pupils.</p> | | | |
| | Measure 5 of WLCMES Target recruitment at Welsh speakers as part of broader recruitment strategies | FfIM 013 | Welsh Language Impact Assessment Report (APP-428) (Appendix B4-1 Welsh Language and Culture Mitigation and Enhancement Strategy) | <p>1. Fforwm Iaitn Môn welcome the commitment to advertise all posts bilingually.</p> <p>2. It is not totally clear, so Fforwm Iaitn Môn wish to receive confirmation that all posts, whether they be specialist posts or otherwise, will be advertised in Publications in Wales, such as: Golwg 360, lleol.cymru, Swyddle, Safle Swyddi, Recriwtio Cyf, etc.</p> <p>3. In trying to target young people of the island and beyond, Fforwm Iaitn Môn see a role here for Fforwm Iaitn Môn members to support Horizon's Recruitment campaign by sharing the information about posts through the contacts of Forum members such as Menter Iaitn Môn, Young Farmers' Clubs, the Urdd and Mudiad Meithrin.</p> <p>According to a report, employers in North Wales were most likely to consider that having staff with Welsh language skills on their site was quite important or very important (57%). Welsh language skills were the most important things in relation to staff relations and well-being as well as retention of staff in North Wales (39%).⁸</p> | Horizon and Fforwm Iaitn Môn are in agreement that all posts will be advertised bilingually. The Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019) notes that Horizon will typically notify all external vacancies to the Wylfa Newydd Employment and Skills Service (WNESS) which will publicise them in Welsh and English. It also notes that, where Horizon or its contractors advertise any such vacancies separately from the WNESS Horizon will require that they are advertised in Welsh and English through local and national recruitment channels that engage with a Welsh-speaking audience. | Not agreed | |

⁸ 'Report on Welsh Language Skills Needs in Eight Sectors 2014'

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| | | | | Fforwm Iaitn Môn would like clarity regarding how this requirement will be conveyed to the sub-contractors and then their sub-contractors also. We suggest that the principles in relation to use of the Welsh language are made clear in the Workforce Code of Conduct and the Language Policy to which the sub-contractors will sign up. | | | |
| | Measure 6 of WLCMES Agree a policy on internal communications | FfIM 014 | Welsh Language Impact Assessment Report (APP-428) (Appendix B4-1 Welsh Language and Culture Mitigation and Enhancement Strategy) | <p>1. This wording is very different to what is noted under point 6.8 in the Language Policy 'We will assess and review this policy at least every two years.' Clarity needed here.</p> <p>2. Reference was made to Horizon's Current Language Policy to evaluate the detail and efficacy of the Policy. Fforwm Iaitn Môn see a number of aspects to be amended in the Current Policy before it is effective to safeguard the language rights of Horizon employees and the public.</p> <p>3. Fforwm Iaitn Môn note the commitment to bilingual services for the <i>public</i> e.g. "We will consider and record what level of Welsh language skills is required to carry out some specific posts in the establishment e.g. where there is direct contact with the public". The Forum feels that Horizon does not have the same commitment to its duties to provide equal opportunities to their <i>employees</i>: "We cannot guarantee that personal communications will be carried out in Welsh at all times but we welcome and encourage staff who can use the Welsh language to do so."</p> <p>In recruiting, a robust commitment is needed to ensure that all staff who provide services internally e.g. human resources, reception, Security, refectory, possess 'essential' Welsh language skills. It should also be ensured that a high percentage of the senior managers can deal with staff management matters fluently and bilingually or it will lead to disadvantage for your Welsh-speaking employees.</p> <p>4. On the basis of equal language opportunities, it is not acceptable not to translate all employment and corporate documents for your employee.</p> | <p>The Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019) notes that Horizon will establish a Welsh Language Policy from commencement until the end of the Operational Period where that policy will contain and require:</p> <ul style="list-style-type: none"> • Details on what types of internal communications will be made available bilingually. • Public-facing permanent and temporary signage on the Sites relating to the Wylfa Newydd DCO Project are bilingual (save where safety or other material considerations require that signage is in English only). • Provision of language and culture awareness training to the Workforce. • Staff members to demonstrate linguistic courtesy and awareness of the Welsh Language Policy. • Development of a programme of Welsh language training for the Workforce operational staff where this is a relevant requirement within a job-role (as determined by the Welsh language skills competency framework established pursuant to Paragraph [Error! Reference source not found.]). • Establishment of a Welsh language mentoring scheme for learners. • Maintenance of the Developer's Welsh speaker badge scheme and using reasonable endeavours to ensure that its contractors operate an equivalent scheme. • Ensure a Welsh-speaking member of staff is included on interview panels for jobs where candidates are required to have Welsh language skills. • An annual review of the policy. <p>The obligations above will therefore supersede the commitments in the existing Horizon Welsh Language Policy. The Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019) also includes obligations relating to contractors, engagement with</p> | Not agreed | |

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| | | | | <p>5. The main technical documents should also be translated, ensuring specialist technical vocabulary in Welsh so that the workers can discuss their work effectively and safely in the Welsh language using standard vocabulary. One of the key themes of the Welsh Government's Strategy for a Million Welsh Speakers is to increase use of the Welsh language. One of the chapters in the Strategy concentrates on opportunities to use Welsh in the workplace and Horizon has a unique opportunity and vital role to play in terms of this commitment. https://gov.wales/docs/dcells/publications/170711-welsh-language-strategy-cy.pdf (page 48 of the Strategy)</p> <p>6. The developer should not put management pressure on staff to turn to English if it is a professional discussion between Welsh speakers. Concern remains regarding lack of forward planning to avoid discriminating against Welsh speakers who choose to speak Welsh in the workplace. The wording of the Language Policy is not robust enough and offers managers the opportunity to insist on use of English-only on safety grounds: "We will support and facilitate use of the Welsh language in the workplace wherever possible, whilst recognising tht English is the operational language of the nuclear industry in the UK and the language of our regulators."</p> <p>7. The translation of technical consultation documents is important to the community and local councils, as many of them discuss developments and respond on paper in Welsh. It is a disadvantage to them if Horizon has not provided the documents in Welsh, depriving the councils / public of the opportunity to quote and use standard specialist technical vocabulary when responding in Welsh.</p> <p>8. Fforwm Iaith Môn welcome the undertaking of Horizon to ensure that the sub-contractors commit themselves to the Language Policy "We will encourage Contractors or third parties carrying out activities on our behalf to comply with this policy."</p> <p>However, the word "encourage" is not robust enough. The Forum would like to receive confirmation that Horizon will bind sub-contractors to the Language Policy through their legal contracts, and that the contract will also bind Tier 2 and 3 sub-contractors.</p> | | | |

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| | | | | <p>9. We request confirmation that Horizon will consult and accept the guidance of the Welsh Language Commissioner in drawing up a more robust Language Policy? Concern remains regarding the function of monitoring the efficacy of the Language Policy and the compliance of Horizon and its sub-contractors.</p> <p>10. The annual work to update the Welsh Language Policy should be discussed with the boards that are mentioned in Measure 21 and 22 (Management Group / External Stakeholders Group) of the WLCMES (appendix B4-1 of the WLIA) [APP-432]. The role of these groups is unclear to Fforwm Iaitn Môn – explanation is needed.</p> | | | |
| | Measure 7 of WLCMES Ensure bilingual signage is used | FfIM 015 | Welsh Language Impact Assessment Report (APP-428) (Appendix B4-1 Welsh Language and Culture Mitigation and Enhancement Strategy) | <p>1. Fforwm Iaitn Môn welcome the fact that all the development's public signage, both permanent and temporary is going to be bilingual Welsh/English.</p> <p>2. In accordance with local practice, the Welsh language needs to be above or to the left of and parallel with the English.</p> <p>3. There is no explanation whether/how the Japanese language/any other languages of the workers will be included. In this context, the Welsh language should be kept visually equal to English. However, in terms of safety, it is acknowledged that it would also be good to ensure multi-lingual signs where appropriate.</p> | The Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019), which notes that 'Public-facing permanent and temporary signage on the Sites relating to the Wylfa Newydd DCO Project are bilingual (save where safety or other material considerations require that signage is in English only). | Not agreed | |
| | Measure 8 of WLCMES Develop and adopt a Welsh language skills competency framework and assessment tool | FfIM 016 | Welsh Language Impact Assessment Report (APP-428) (Appendix B4-1 Welsh Language and Culture Mitigation and Enhancement Strategy) | <p>1. See the relevant comments on mitigation measure 2 (FfIM 010).</p> <p>2. Welsh language Skills Competencies Framework, as well as the Welsh Language Skills Assessment Resource. Concern remains regarding lack of receiving expertise to support Horizon to provide this, as the company does not possess expertise in this field.</p> <p>3. It is a complex area in terms of assessing competence as well as in providing the learning resources in the Language Skills Strategy. Fforwm Iaitn Môn request confirmation regarding the number of tutors/staff of the Welsh Learners' Centre (standard providers of Welsh language learning in the area) will be needed.</p> | <p>Horizon and Fforwm Iaitn Môn are in agreement that Horizon will develop, in consultation with IACC and the Welsh Government, a Welsh language skills competency framework and assessment tool as secured in Schedule 1 of the Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019), which notes that this framework and tool will:</p> <ul style="list-style-type: none"> utilise the emerging Welsh Government Diagnostic Toolkit (being produced by the National Centre for Learning Welsh); follow the Council's 5-level workplace Welsh Language Skills Strategies document 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 | Not agreed | |

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| | | | | | <p>Officers, and defined internal roles such as members of the café staff and HR team];</p> <ul style="list-style-type: none"> identify periodic timings for updates in consultation with the Council and the Welsh Government, and the Developer will thereafter implement the Welsh language skills competency framework and assessment tool until the end of the Operational Period (or as otherwise agreed by the Parties). | | |
| | <p>Measure 9 of WLCMES</p> <p>Distribute information on the Welsh language throughout the recruitment process and supply chain</p> | <p>FfIM 017</p> | <p>Welsh Language Impact Assessment Report (APP-428) (Appendix B4-1 Welsh Language and Culture Mitigation and Enhancement Strategy)</p> | <ol style="list-style-type: none"> Fforwm Iaitn Môn welcome the proposal to lead by communicating the corporate expectation to respect the Welsh language and its culture that will be included in the recruitment materials. However, much more details are needed to turn this proposal into effective mitigation action. Bear in mind the island's targets to reach 60.1% of Welsh speakers by 2021. There is a need to mitigate and invest much more to maintain and support communities that are facing: a drop of 17.2 percentage points in North Anglesey, a drop of 2.0 percentage points in West Anglesey, a drop of 1.5 percentage points in South Anglesey, a drop of 0.5 percentage points on the Menai Mainland. 'Distribution' is a passive act for the recipient – it is not possible to ensure the material is read, understood or accepted. The communication should take place face to face. In fairness to the local communities, much more effort should be invested in ensuring that all members of staff, including those of the sub-contractors, receive an hour of language awareness before commencing on the site. Then staff presentations should continue to be used regularly to develop the awareness. It is not fair to expect the communities to shoulder the burden of communicating this and lack of understanding can lead to conflict in our communities. Also, in order to ensure real impact, rather than forcing, there is a need to offer the workforce support in the community to enjoy the Welsh language and its culture, in order to see and experience its value to them personally. Experienced providers should be used who can transfer enthusiasm and a love for the language and culture by offering a chance to discuss and dispel stereotypes. | <p>Horizon and Fforwm Iaitn Môn are in agreement that Horizon will communicate its expectations to demonstrate linguistic courtesy in its recruitment processes and materials.</p> <p>Horizon will provide its contractors with information on Horizon's Welsh Language Policy and obligations in the Draft DCO s.106 [REP3-042] and the contractors' role in delivering such policy and obligations including for example via their recruitment processes and internal and external communications. Horizon will include Welsh language information requirements as an agenda item for all relevant contractor meetings</p> <ul style="list-style-type: none"> Information on local suppliers including the business database being developed by Isle of Anglesey County Council (IACC), other local authorities, North Wales Economic Ambitions Board and Welsh Government; and any other materials agreed by the Developer and the IACC. <p>As part of the induction process for the Workforce operating on the Site Horizon will provide the Workforce attending such site induction(s) with the following Welsh language materials:</p> <p>Welsh language briefing packs and/or induction materials;</p> <p>the "Byw mewn gwlad ddwyieithog/Living in a bilingual nation" Welsh Language booklet produced by the Welsh Government dated 2017;</p> <ul style="list-style-type: none"> any other materials agreed by Horizon and the Council. The purpose of the information provided to contractors and the Workforce under Paragraphs [3.1 of the Draft DCO s.106] and [3.2 of the Draft DCO s.106] will be to raise awareness of and respect for the Welsh language and culture, and Welsh speaking among the contractors and the Workforce. Horizon will include Welsh language information requirements as an agenda item for all relevant contractor meetings. | <p>Not agreed</p> | |

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| | | | | <p>5. There is no identification of the scale, complexity and Investment necessary in events to achieve this in the mitigation actions. We request confirmation regarding mitigation beyond the DCO s.106, and the governance of any investment beyond that agreement. Consideration should be given to the effect on the psyche of Welsh speakers who will face a deterioration of 17.2% in their communities, and investment should take place to mitigate the loss in those communities.</p> <p>6. It should also be ensured that the "local" workers are involved in the language awareness and the definition of "local" includes areas that are up to 90 minutes travelling time away, thus including areas that are not strongholds of the Welsh language.</p> | | | |
| | <p>Measure 10 of WLCMES Ensure that the Welsh language is considered in procurement processes</p> | <p>FfIM 018</p> | <p>Welsh Language Impact Assessment Report (APP-428) (Appendix B4-1 Welsh Language and Culture Mitigation and Enhancement Strategy)</p> | <p>1. The wording of this mitigation measure is too vague: 'information about the Welsh language as an agenda item' to achieve what? And 'providing information' which is a passive act without explanation of how Horizon will ensure compliance.</p> <p>2. See Fforwm Iaitn Môn comments on measure 6 (FfIM 014) for prioritising the Welsh language in the Code of Conduct and strengthening the Language Policy, and receiving guidance from specialist leaders such as the Welsh Language Commissioner to safeguard the language rights of the employee as well as to mitigate the impact of the development on the community.</p> <p>3. Fforwm Iaitn Môn awaits confirmation that Horizon will bind Tier 1 sub-contractors and thus Tier 2 & 3, to the Language Policy through the service provision agreement.</p> <p>4. Sub-contractors should follow Horizon's Welsh language policy in terms of recruitment, procedures, dealing with staff, dealing with community councils and local partners, and dealing with the community.</p> <p>5. There is a need for clarity regarding the role of the Language Officer, the senior level Monitoring Group, IACC and mitigation groups - measures 21 - 24 (FfIM 029 – FfIM 032).</p> | <p>In terms of contractors, the Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019) further notes that, prior to contractors commencing work on sites, Horizon will provide its contractors with:</p> <ul style="list-style-type: none"> information on the Horizon's Welsh Language Policy and obligations in this [Error! Reference source not found.] and the contractors' role in delivering such policy and obligations including for example via their recruitment processes and internal and external communications; Information on local suppliers including the business database being developed by IACC, other local authorities, North Wales Economic Ambition Board and Welsh Government; and any other materials agreed by the Developer and the Council. <p>The Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019) notes that, as part of the induction process for the Workforce operating on the Site, the Horizon will provide the Workforce attending such site induction(s) with the following Welsh language materials to raise awareness of and respect for the Welsh language and culture, and Welsh speaking among the contractors and the Workforce:</p> <ul style="list-style-type: none"> Welsh language briefing packs and/or induction materials; the "Byw mewn gwlad ddwyieithog/Living in a bilingual nation" Welsh Language booklet produced by the Welsh Government dated 2017; any other materials agreed by the Developer and the Council. | <p>Not agreed</p> | |

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| | | | | | To enable and facilitate the implementation of the above obligations, Horizon will include Welsh language information requirements as an agenda item for all relevant contractor meetings. | | |
| | Measure 11 of WLCMES Ensure information on local contractors is distributed throughout supply chain | FfIM 019 | Welsh Language Impact Assessment Report (APP-428) (Appendix B4-1 Welsh Language and Culture Mitigation and Enhancement Strategy) | <ol style="list-style-type: none"> 1. Much more clarity is needed as 'information' and 'encourage' are not robust commitments in the form of agreements. It appears at present to be a passive act of encouraging the use of companies that are on a data base being developed by others. Fforwm Iaitth Môn see no evidence of Horizon's intention to work more proactively and yet this is one of the most important matters to small companies in our Welsh-speaking communities, as demonstrated by the FSB representative through Unllais, as a number of small Contractors lost workers they had trained for the existing power station due to salaries. 2. To benefit locally therefore, it is the duty of a major developer such as Horizon to do much more than share a database, there is a need to invest in a binding relationship and liaison events between the local Contractors and managers and sub-contractors. In order to make preparations with staffing, Horizon should arrange site visits, share technical plans and the various sub-contracting opportunities well beforehand in order to ensure an advantage for local Contractors to prepare in a timely manner for the opportunities. Wider opportunities should be made known too such as the provision of bus and food services emphasising the advantage for companies with bilingual employees. There should be local consultation regarding availability and the work broken down into smaller contracts in order to include more local businesses. In assessing tenders, recognition should be added of the additional value a local company can offer by reducing the effect on the environment, contributing more to the local economy, operating in keeping with the community and of course communicating bilingually with the local community. Fforwm Iaitth Môn request a written plan that demonstrates Horizon's intention to be proactive in including local providers including a timetable to ensure that local businesses can prepare to apply in good time. 3. Fforwm Iaitth Môn is not familiar with Menter Newydd. | <p>Schedule 4 of the Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019) includes several proactive measures Horizon will undertake to maximise local opportunities. These include:</p> <ul style="list-style-type: none"> • Annual economic Development Officer Contribution; • Skills fund; • Wylfa Newydd Employment and Skills Service; and • Supply Chain Portal • Supply Chain Action Plan • Jobs and Skills Implementation Plan. <p>The SCAP and Jobs and Skills Implementation Plan will be developed with IACC and Welsh Government, at which stage further detail can be agreed to ensure that local contractors can access the benefits of the Wylfa Newydd Project.</p> <p>The local business database is an initiative by IACC, other local authorities, North Wales Economic Ambitions Board and Welsh Government.</p> | Not agreed | |

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| | | | | <ol style="list-style-type: none"> 4. Fforwm Iaitn Môn request more details about the Business Database. 5. In all of this Fforwm Iaitn Môn are seeking a robust commitment to ensure advantages for companies that employ Welsh speakers and companies that maintain our local Welsh-speaking communities. | | | |
| | <p>Measure 12 of WLCMES</p> <p>Develop a programme of training related to the Welsh language, encourage take-up and establish a mentoring programme</p> | FfIM 020 | <p>Welsh Language Impact Assessment Report (APP-428) (Appendix B4-1 Welsh Language and Culture Mitigation and Enhancement Strategy)</p> | <ol style="list-style-type: none"> 1. This measure appears as a series of statements in the form of desires, without a strategy or structure, suggesting that Horizon does not fully understand the impact of the development on the Welsh language in Anglesey, the impact of up to 9000 workers on the island's target of achieving 60.1% of Welsh speakers, and the investment that has already been made on the Island to realise the objectives of the government's Cymraeg 2050 and the IACC Language Strategy. Specifically, we draw attention to the use of vague words such as "request" "when this is a relevant requirement for a post" "encourage". 2. To mitigate the impact of up to 9000 workers in the Island, the viewpoint of Fforwm Iaitn Môn on Language Awareness is that it should be compulsory for all members of staff and their families. Training of at least an hour by experienced local providers who can transfer the enthusiasm as well as dispel stereotypes. There is a need to invest in packages of provision/informal/community events to add value to this. Menter Iaitn Môn is in a position to be offering language awareness with a financial investment from Horizon to subsidise the time of staff and Forum partners who will be available to present enjoyable and motivational events for the families of workers. 3. A request to show courtesy. It is Fforwm Iaitn Môn's view that this is an unrealistic desire without investment in language awareness, Welsh-language activities, and the offer of learning Welsh for everyone. Fforwm Iaitn Môn therefore request sight of the Training Strategy Plan. Details are required regarding how Horizon will achieve this and expect to see the developers working with IACC to adopt Welsh language ability Levels 1-5, and to consult with the Ganolfan Dysgu Cymraeg to identify suitable packages and to plan the capacity for offering Welsh in the workplace. 4. Timetable – providers will need to adapt their strategies and arrange capacity in terms of | <p>The Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019) notes that Horizon will establish a Welsh Language Policy from commencement until the end of the Operational Period where that policy will contain and require:</p> <ul style="list-style-type: none"> • Provision of language and culture awareness training to the Workforce. • Staff members to demonstrate linguistic courtesy and awareness of the Welsh Language Policy. • Development of a programme of Welsh language training for the Workforce operational staff where this is a relevant requirement within a job-role (as determined by the Welsh language skills competency framework established pursuant to Paragraph [Error! Reference source not found.]). • Establishment of a Welsh language mentoring scheme for learners. • Maintenance of the Developer's Welsh speaker badge scheme and using reasonable endeavours to ensure that its contractors operate an equivalent scheme. • An annual review of the policy. <p>The Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019) also notes that data on the Welsh language skills of the workforce will be reported to the WLC Engagement Group annually.</p> <p>Information on the timeline of workers is set out in (Chapter C1 of the Environmental Statement [APP-088]).</p> | Not agreed | |

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| | | | | <p>Language Awareness, Events, Learning Welsh, beforehand. Fforwm Iaith Môn therefore request a timetable indicating the expected numbers and when the demand will be. Also, the data needs to be placed in the context of the annual reports of the Forum's Partners to the government, which seeks a measure of the achievement and success of their work and their investment in the context of the Cymraeg 2050 Targets and the increase in the percentage of Welsh speakers on the island.</p> <p>5. Fforwm Iaith Môn request clarity as Fforwm Iaith Môn is not familiar with how Horizon will use the data. Similarly, the methods of monitoring progress in Welsh language skills is uncertain.</p> | | | |
| | <p>Measure 13 of WLCMES Collecting and sharing data on the needs of families of workers moving to the area</p> | <p>FfIM 021</p> | <p>Welsh Language Impact Assessment Report (APP-428) (Appendix B4-1 Welsh Language and Culture Mitigation and Enhancement Strategy)</p> | <ol style="list-style-type: none"> 1. Concern remains regarding Horizon's methodology and the timing of releasing information. 2. Numbers and Methodology: Fforwm Iaith Môn note an inconsistency in terms of numbers; Horizon estimates 220 and IACC assesses the numbers to be over 500. The higher figures come from the assessment of two consultants who reached the conclusion independently that the expected number was over double the number of 220 suggested by Horizon. As a result, Fforwm Iaith Môn expect more clarity regarding Horizon's methodology to explain the difference, because by underestimating the numbers, there will be a burden and costs to public services, to the community and to the Welsh language. 3. Also, Fforwm Iaith Môn do not see a reference to the cumulative impacts of the development on other numbers of workers coming to the Island and their partners and children. Fforwm Iaith Môn request more information. Directly associated with the timetable for the Wylfa Newydd DCO Project, 400 more National Grid workers are expected, and a number of workers to erect a new bridge to facilitate transport to Wylfa. 4. Timing: Bearing in mind that the community is trusting Horizon to construct one of the largest buildings, with the most complex technology in | <p>The assumptions relating to the number of school aged children expected to move into the KSA during construction is based on assumptions derived from the socio-economic assessment (Chapter C1 of the Environmental Statement – [APP-088]).</p> <p>The Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019) notes that data will be shared with the WLC sub group quarterly.</p> <p>Cumulative effects are assessed in Volume H of the WLIA [APP-432].</p> <p>The Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019) includes an obligation to provide a Welsh Language Education (Annual) Contribution as well as a Welsh Language Education (Contingency) Fund. It includes details on how payments from the Welsh Language Education (Annual) Contribution will be structured and principles for triggering the Welsh Language Education (Contingency) Fund. As part of these principle, it includes obligations for Horizon and IACC to monitor the number of workforce dependents.</p> <p>The Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019) notes that the information collected will include (where available and subject always to compliance with Data Protection Legislation) the Welsh Language skills of such partners and children, and the number of children and their ages.</p> | <p>Not agreed</p> | |

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| | | | | <p>Europe, it is expected that the company is competent in estimating numbers beforehand and releasing information anonymously long beforehand so that Fforwm Iaitn Môn's partners can undertake forward planning. Fforwm Iaitn Môn understand from partners that numbers will have to be confirmed by 2019 so we seek confirmation of this in the timetable. The response to this urgency is an essential part of realising effective mitigation measures.</p> <p>5. To accompany the assessment of of the numbers of families, children, age, Fforwm Iaitn Môn would wish to see a timetable for completing workers' accommodation to check how many workers without accommodation there will be in the communities.</p> <p>6. It is vitally important to share this information with the relevant parties in order to respond in a timely manner to reduce damaging effects. The impact on the early years is a concern to the Mudiad Meithrin which leads the Welsh-language provision for pre-school age children on the island. Concern remains regarding lack of testing the methodology used to determine the number of children foreseen that are likely to relocate to the area. Fforwm Iaitn Môn believe not enough data has been received to enable Local Planning Authorities to plan provision.</p> <p>Fforwm Iaitn Môn know from public PINS documents that IACC has commissioned two independent investigations which double the expected number of dependents – children and young people.</p> <p>7. Concern remains regarding the lack of a timetable for sharing this data with Local Authorities and other relevant bodies such as Mudiad Meithrin. If it is not shared until the workers and their families have arrived or shortly before that, it will be much too late to plan the provision.</p> <p>8. Neither does it provide adequate time for families to receive information in order to make positive decisions regarding Welsh-language care and education for their children. Neither would they receive information about the various provisions that are available to support them to learn and use the Welsh language as a family.</p> | <p>The WLIA [APP-432] includes dependents (partners and children) as part of the assessment of effects.</p> <p>In terms of early years provision, Schedule 6 of the Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019) notes that IACC may utilise the Education (Contingency) Fund for pre-school provision.</p> | | |

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| | | | | <p>9. More details are needed regarding the data e.g the age of the children, location in which they are settling, language skills.</p> <p>10. Consideration must be given to the capacity of the Mudiad Meithrin to offer places for the children. It is possible that it will be necessary to employ more staff in some specific 'Cylchoedd' (nursery groups).</p> <p>11. The ratio of children to staff is vitally important (1 to 4 with children aged two years and 1 to 8 with three year olds) and this must be ensured at all times.</p> <p>12. School age children – Fforwm Iaitn Môn refer to this in FfIM 024.</p> <p>13. Adults seeking work – Fforwm Iaitn Môn see no assessment of numbers and the impact of partners seeking employment locally on the labour market and the Welsh language.</p> <p>14. Fforwm Iaitn Môn welcome the fact that this is part of a DCO s.106, but more details are needed of the methodology, pre-planning with estimates reaching the public services by 2019, and a reserve fund to use non-statutory providers to help with the mitigation.</p> | | | |
| <p>Mitigation and enhancement measures relating to children, young people and families</p> | <p>Measure 14 of WLCMES Develop educational resources for primary, secondary and Further Education learners</p> | <p>FfIM 022</p> | <p>Welsh Language Impact Assessment Report (APP-428) (Appendix B4-1 Welsh Language and Culture Mitigation and Enhancement Strategy)</p> | <p>1. Unclear what 'continue' and 'educational support' are.</p> <p>2. Fforwm Iaitn Môn welcome the opportunity to deliver industry and science in the classroom to local pupils, reminding the developers that there is sometimes a very thin borderline between offering educational support as part of soft PR and offering balanced education on all methods of energy production according to the educational expectations of the Welsh Government.</p> <p>3. To improve the provision Wylfa previously had, Fforwm Iaitn Môn ask that all the providers are fluently bilingual in order to be able to teach through the medium of Welsh only if this is the medium of teaching science at the school. There is increasing demand on schools to deliver STEM subjects and by securing bilingual teachers, this will provide an opportunity for more local applicants to join the team and contribute towards the creation of an</p> | <p>Schedule 6 of the Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019) includes an Education Contribution which IACC will utilise for early capacity enhancement within Local Schools in Anglesey and to deliver capacity enhancement within timeframes appropriate to avoid impacts arising from Workforce Children attending such schools, and where capacity enhancement is likely to include.</p> <p>Schedule 6 of the Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019) also includes a commitment to develop an education strategy which confirms:</p> <ul style="list-style-type: none"> • Horizon's engagement with the five secondary schools and 47 primary schools on Anglesey as well as the wider region, • Horizon and its Tier 1 Contractor's engagement with the STEM Gogledd Project. • Horizon's delivery of the existing 'Work Insight Week', or an equivalent scheme, to young people (a tailored week-long programme for Year 11, 12 and 13 students from schools in Anglesey, Gwynedd and | <p>Not agreed</p> | |

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| | | | | <p>increasing cohort of scientists who can deal with their work bilingually.</p> <p>4. Further comments under FfIM 024.</p> | <p>Coleg Menai which provides students with an insight into the Wylfa Newydd Project and its opportunities for young people).</p> | | |
| | <p>Measure 15 of WLCMES</p> <p>Maintain the Project apprenticeship scheme and work insight week</p> | FfIM 023 | <p>Welsh Language Impact Assessment Report (APP-428) (Appendix B4-1 Welsh Language and Culture Mitigation and Enhancement Strategy)</p> | <p>1. “Expanding the provision of further and higher education through the medium of Welsh and providing opportunities to follow apprenticeships in the Welsh language.” (page 56, 2017) ⁹ are central to Theme 1, Cymraeg 2050 Strategy, Welsh Government. It is welcomed by the Forum as it can be an important impetus for a career, and by targeting locally and emphasising the advantages of bilingual skills, Horizon will be nurturing and developing bilingual leaders in the industry.</p> <p>To realise the potential of this, the Forum seeks confirmation regarding:</p> <ul style="list-style-type: none"> - Annual numbers. - a commitment to ensure the apprentices come from Anglesey, Gwynedd and Conwy only and that the Welsh language is recognised as an important skill in applying for apprenticeships? -the recruitment and all resources will be in Welsh, including an opportunity to be interviewed in Welsh. - the apprenticeship experience will also include the opportunity to experience immersion in Welsh for those who have not seen bilingualism in practice in the workplace. <p>The GwE scheme to ‘Develop the Workforce to support Welsh in Education’ notes:</p> <p>‘We acknowledge that ‘education’ by itself cannot create confident Welsh speakers. We are fully aware that opportunities are needed for children and young people to use Welsh in a number of contexts to enrich their learning and awareness of Welsh as an everyday language... one aim we have is to ensure that our pupils recognise opportunities to use their</p> | <p>Schedule 4 of the Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019) notes that Horizon will expand its existing Wylfa Newydd DCO Project Technical Apprenticeship Scheme throughout the Construction Period with the aim of targeting 20% of the site-based operational workforce being graduates from the Wylfa Newydd DCO Project Technical Apprentice Scheme.</p> <p>The majority of the current apprentices are Welsh speakers.</p> | Not agreed | |

⁹ <https://gov.wales/docs/dcells/publications/170711-welsh-language-strategy-cy.pdf>

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| | | | | <p>Welsh beyond the classroom in workplaces” Arwyn Thomas, GwE Managing Director.</p> <p>Estyn demonstrates in the publication ‘Alinio’r Model Prentisiaeth ag Anghenion Economi Cymru’ (Aligning the Apprenticeship Model with the Needs of the Welsh Economy) that the priorities of the Welsh Government for Apprentices 2016-22 is to strengthen opportunities to follow apprenticeships in Welsh or bilingually, thus ensuring that every learner can maintain and develop their Welsh language skills.</p> <p>All this supports the opportunity for Horizon to be innovative in their commitment to the Welsh language.</p> | | | |
| | <p>Measure 16 of WLCMES Support the language immersion service</p> | <p>FfIM 024</p> | <p>Welsh Language Impact Assessment Report (APP-428) (Appendix B4-1 Welsh Language and Culture Mitigation and Enhancement Strategy)</p> | <ol style="list-style-type: none"> 1. In terms of scale, we cannot overemphasise our disagreement with how inadequate this step will be to mitigate the impact of the development on the Welsh language in education. The intention is to mitigate something that is going to get worse – and the challenge is massive to mitigate the effect of a drop in the percentage of Welsh speakers to less than 50%. Horizon’s answer is not a solution to this challenge and it is felt that it reflects a lack of commitment, an unwillingness to invest to match the size of the development, or a lack of understanding of language planning. 2. Numbers - see point 6 in FfIM 021 where we ask for the methodology from Horizon that has come to a very different conclusion than the assessment of two IACC independent consultants. Due to the worsening of educational standards and the use of Welsh, identifying the correct number is essential to mitigate the effects on schools. It is reasonable for us to accept the IACC assessment of numbers given the expertise of IACC and the assessment by two experts who reached an independent conclusion of similar numbers that are more than double the numbers given by Horizon. 3. Teacher numbers – unanimously, all members of the Forum have stated that the offer of 2 teachers, and 1 in Gwynedd is an insultingly low offer to mitigate the impact of the development on education in Anglesey. Considering the range and breadth of our experience on the Forum, supporting families, communities and schools, and bearing in mind that Gwe, educational experts on behalf of the government in North Wales are also members of | <p>IACC have noted that the teacher to pupil ratio in immersion provision should not exceed 16:1 (Paragraph 3.4.7 of REP2-100 Isle of Anglesey County Council Deadline 2 Submission - Local Impact Report - Annex 1Q). This annual pupil to teacher ratio is based on two intakes of 8 pupils per immersion teacher per annum.</p> <p>Paragraph 7.3.4 of Chapter 7 of IACC’s Local Impact Report [REP2-067] includes IACC’s forecasts for the number of workforce children per annum and the number of workforce children anticipated to access immersion provision (‘immersion episodes’) in each year. IACC’s forecasts anticipate 8 workforce children accessing immersion provision in each of the the first and second years of the Wylfa Newydd DCO Project.</p> <p>Horizon’s assessment anticipates that 220 workforce children will move to the KSA during the construction phase. Horizon disagrees with IACC’s assessment that 505 workforce children will move to the KSA during the construction phase.</p> <p>Horizon has used IACC’s projected profile of workforce dependents (from Paragraph 7.3.4 of Chapter 7 of IACC’s Local Impact Report [REP2-067]), and applied this to an assumed peak of 220 workforce dependents (using a ratio of 220/505 to adjust IACC’s number of workforce children and immersion episodes) to estimate the annual number of workforce dependents accessing immersion provision.</p> <p>By applying the 16:1 pupil to teacher ratio to the annual number of workforce dependents that are estimated to access immersion provision, Horizon has calculated the anticipated annual funding contribution required to provide</p> | <p>Not agreed</p> | |

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| | | | | <p>Fforwm Iaitn Môn - a serious look should be taken at Horizon's lack of willingness to tackle the impact of the development on education and on Welsh for children.</p> <p>4. Fforwm Iaitn Môn unanimously supported the assessment of IACC regarding the provision of 12 members of staff to mitigate the impact and we do not believe that Horizon has any basis for opposing this, considering the understanding and experience of IACC and the independent, professional assessments, compared to the lack of understanding and experience of Horizon and the lack of evidence of Investment in language and education planning consultants. IACC has regularly over the years advised Horizon regarding the shortcomings in their mitigation objectives on this matter, and we have witnessed this in the county Language Forum, so it is disappointing that Horizon has not accepted the expertise of the interested parties and the local authority. It will not be possible to agree to this unless the developer accepts IACC's request in full.</p> <p>5. Also, the ratio of immersion teachers to children (1 to 8) is vitally important as this method has proved to be successful over the years, and all members of the Forum reinforced this from their professional experience of dealing with the language units and the children who have benefited from the provision. This is the procedure across the island before Horizon arrived, so we are not prepared to accept a reduction in the standards following a drop in the teacher/children ratio as a result of the development. We note therefore, should the service be needed by more children, Horizon should commit to employ more teachers to meet the demand without delay.</p> <p>6. Money will need to be released beforehand in 2019 in order to ensure sufficient years to train these specialist teachers in order to be ready to admit the children to the immersion service. It is vital there is no delay between the time the children arrive in the area and when they go to the immersion provision. Once the children have started the habit of speaking English at school, it will be very difficult and will need more resources to change their language habits.</p> <p>"Most immersion teachers are particularly committed to bilingual education, enthusiastic</p> | <p>immersion provision to workforce children at a pupil to teacher ratio of 16:1. The Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019) includes an obligation to provide a Welsh Language Education (Annual) Contribution which is equivalent to this amount.</p> <p>The Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019) also includes a Welsh Language Education (Contingency) Fund, accessible if the pupil to teacher ratio exceeds 16:1.</p> <p>The Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019) includes details on how payments from the Welsh Language Education (Annual) Contribution should be structured and principles for triggering the Welsh Language Education (Contingency) Fund. As part of these principle, it includes obligations for Horizon and IACC to monitor the number of workforce dependents.</p> | | |

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| | | | | <p>about bilingualism in society, acting as language missionaries. In the equation of a successful bilingual school, such enthusiasm and commitment may be an important and often underestimated factor in success. The commitment of bilingual teachers, and the special skills that a bilingual teacher uses beyond those required of a monolingual teacher, may be underestimated in the equation of successful bilingual schooling.” (page.178, 2014)¹⁰</p> <p>7. The advent of children without ability in Welsh to local schools will influence the language of the classroom, the yard, local social clubs and further afield within the community. For children from non-Welsh speaking backgrounds it will be necessary to provide ongoing extra-curricular immersion opportunities for the pupils after they have left the language units. This is a service that is already offered e.g. by the Urdd, Menter Iaitn Môn and Young Farmers’ Clubs and there will be a need to increase financial support to these to increase staff capacity due to the increase in frequency and the extension of placements on the principle of proximity, if we are going to mitigate the impact on the Welsh language of the children in community activities outside school hours.</p> <p>“The Irish and Welsh immersion experiences tend to suggest that most children whose home language is English will cope successfully in minority language immersion classrooms. For such children, the language context is additive rather than subtractive. The danger is that the majority language of English, being the common denominator, will be the language used between pupils in the classroom, in the playground and certainly out of school. A balance towards a greater proportion of language minority speakers may help to ensure that the ‘common denominator’ majority language does not always dominate in informal classroom and playground talk.” (page. 179, 2014)¹¹</p> <p>8. Similar to FfIM 021 – Fforwm Iaitn Môn wants to see a timetable for the release of anonymous data, allowing the early years and schools to prepare from 2019 onwards. Considering the interest of the</p> | | | |

¹⁰ A Parents’ and teachers’ Guide to Bilingualism, Colin Baker 2014

¹¹ Baker, C (2014). *A Parents’ and teachers’ Guide to Bilingualism*. Fourth edition.

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| | | | | <p>parties, we emphasise that it is not appropriate for the public to conclude that Horizon is benefiting from savings by delaying, whilst the children will suffer educationally with IACC bearing the financial burden of any delay.</p> <p>9. We emphasise the weakness of Horizon's preparations to mitigate the impact due to lack of investment in bespoke language planning and an unwillingness to accept advice from experts in the field. We greatly hope that the company will identify the shortcomings in their preparations and reconsider this important mitigation measure.</p> <p>10. Neither are there details here of the mitigation measures for children who have neither the Welsh or English languages. We request an explanation as to how the immersion process will work and in what order will it take place for such children.</p> <p>11. The development has the potential to change the percentage of Welsh speakers in Anglesey very detrimentally and the Welsh speakers will become a minority for the first time ever.</p> <p>This could affect the attitudes of other providers towards the communities and reduce the efforts to offer Services in Welsh, as more speak English. It could also lead to frustration or conflict from Welsh speakers who see the loss of their language and culture. There is no evidence that Horizon has evaluated this and proposed mitigation measures.</p> | | | |
| | <p>Measure 17 of WLCMES Develop welcome packs for families of Project workers</p> | <p>FfIM025</p> | <p>Welsh Language Impact Assessment Report (APP-428) (Appendix B4-1 Welsh Language and Culture Mitigation and Enhancement Strategy)</p> | <p>1. Of course, a welcome pack is to be welcomed but again this is just the start to mitigate the scale of the development's impact on the language of the communities. The communities across Anglesey are going to be dropping in terms of the percentage of Welsh speakers, with some dropping as much as 17%. It appears that Horizon is depending on research and collecting data rather than language planning expertise beforehand when proposing measures to mitigate the impact in the communities.</p> <p>One example: 'Taking Action Locally – Framework by the Ganolfan Iaitn and updated and adopted by the Welsh Government 2014 for micro language planning among Welsh-speaking neighbourhoods https://llyw.cymru/topics/welshlanguage/publications/gweithredun-lleol-resource-pack/?lang=cy</p> | <p>Horizon and Fforwm Iaitn Môn are in agreement that welcome packs will be provided to workers and their families. Many of the other obligations in the Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019) will contribute to integrating workers and their families.</p> <p>The CIOs and Welsh Language Officer, secured in the Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019), will contribute to integrating workers and their families as well as in building capacity and confidence among the local population. IACC as an employer will have a key role in shaping the roles of these officers.</p> <p>Community organisations will be able to apply to access the Community Fund secured in Schedule 12 of the Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019).</p> | <p>Not agreed</p> | |

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| | | | | <p>2. Concern remains regarding the Welcome Pack, it is not possible to monitor that these are being read and considered without being part of a wider community pack.</p> <p>3. This mitigating action is passive – it feels like a tick in a box without starting to tackle the real impact of workers and their families on our communities. The information provided to families will need to convey a welcoming community and community events to support this.</p> <p>4. There is a need to invest to create ‘package’ that is more than just a Welcome Booklet to offer opportunities to assimilate communities. Informal opportunities are needed to use Welsh, to assimilate new speakers, newcomers and fluent speakers.</p> <p>“why we should care about dying languages at all? We should care for the very same reason that we care when a species of animal or plant dies. It reduces the diversity of our planet. ... the issues are the same. Enshrined in a language is the whole of a community’s history, and a large part of its cultural identity. The world is a mosaic of visions. To lose even one piece of this mosaic is a loss for everyone.” (page, 339, 2006)¹²</p> <p>5. The measures do not acknowledge the work of all the community groups that are already investing to maintain the Welsh language: Menter Iaith Môn, Menter Môn, Medrwn Môn, Mudiad Meithrin, the Urdd, Young Farmers’ Clubs, Theatr Ieuencid Môn, Côr yr Ynys, Theatr Fach, Sports Clubs, Youth Clubs, the chapels and churches, lunch clubs and literary clubs, Merched y Wawr, Canolfan Dysgu Cymraeg and specialising in the make-up of their communities – the community and town councils. All these are investing their time and resources trying to support and improve the percentage of Welsh speakers in Anglesey.</p> <p>Achieving success in language learning: “Motivation is a central factor...Attitude towards the foreign language is important. If a student perceives a country or culture to be unpleasant, for whatever reason, the negative attitude is likely to influence</p> | <p>The Welsh Language Education (Annual) Contribution and Welsh Language Education (Contingency) Fund will support the integration of workforce children.</p> <p>Horizon would provide language awareness training to all workers and welcome packs will be provided to all families. The Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019) states that Horizon will require provision of language and culture awareness training to the Workforce and will require staff members to demonstrate linguistic courtesy and awareness of the Welsh Language Policy.</p> | | |

¹² ‘How Language Works’, David Crystal 2006

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| | | | | <p>language learning achievement – and conversely...Exposure... needs to be regular...Exposure to native users.” (page. 435, 2006)¹³</p> <p>6. It is welcomed that this is part of the DCO s.106 between IACC and Horizon. However, Menter Iaitn Môn and the above partners are in a strong position to carry out this work; clarity is needed on the governance and order of implementing the DCO s.106 and the role of the smaller organisations in the process.</p> <p>7. Concern remains regarding the lack of understanding of the role of the WLCC and DCO s.106 expenditure.</p> <p>8. Concern remains regarding Investment to raise the awareness and confidence of Welsh-speaking families locally of the importance of maintaining and sharing the Welsh language in the community.</p> <p>Reference should be made to ‘Welsh language transmission and use in families’, Research by the Welsh Government 2017 in this context ¹⁴ which answers the two questions regarding what influences the transmission of the Welsh language and its use in families. It is full of data and also examples by individuals conveying how complex it is to transmit language even for Welsh speakers when living in a community with a higher percentage of people who cannot speak Welsh: e.g. a parent from Anglesey explaining that she does not change to Welsh if her child speaks English to her:</p> <p>“If she starts [speaking English] I won’t change it, I wouldn’t specifically do it on purpose like, but I think because they watch English programmes, if they play with ‘My Little Pony’ speaking English comes naturally to them... and also I think there are English-speaking children on the yard, there’s English going on.’ Mother – Anglesey (page.120, 2017)¹⁵</p> | | | |

¹³ ‘How Language Works’, David Crystal 2006

¹⁴ Welsh Government, 2017. *Welsh Language Transmission and Use in Families*. Available at: <https://gov.wales/docs/caecd/research/2017/170612-welsh-language-transmission-use-in-families-en.pdf>.

¹⁵ Welsh Government, 2017. *Welsh Language Transmission and Use in Families*. Available at: <https://gov.wales/docs/caecd/research/2017/170612-welsh-language-transmission-use-in-families-en.pdf>.

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| | | | | <p>'Lyon (1996¹⁶) reported that a clear majority of all parents in her survey as part of her research on Anglesey (85%) desired their children to be fluent in Welsh' (page.33, 2017)</p> <p>9. Concern remains regarding ensuring that families coming into the area are aware of opportunities to be active with the third sector which is enriching communities. All of Fforwm Iaitn Môn's partners are willing to work with the WLCC to realise this.</p> | | | |
| Mitigation and enhancement measures relating to community and local services | Measure 18 of WLCMES Support community language representation | FfIM026 | Welsh Language Impact Assessment Report (APP-428) (Appendix B4-1 Welsh Language and Culture Mitigation and Enhancement Strategy) | <p>1. The role of the CIO's is welcomed and Fforwm Iaitn Môn request details of their functions and confirmation that the Welsh language will be essential for these posts.</p> <p>2. Fforwm Iaitn Môn needs more information. It is not clear whether there is financial investment to support these CIO's beyond the costs of the posts.</p> <p>3. Fforwm Iaitn Môn needs more information. It is not clear what the role is of the organisations that are already serving this local community. Partners should be included e.g. Menter Môn, the Urdd, Young Farmers's Clubs, Dysgu Cymraeg, Menter Iaitn Môn, Medrwn Mon... in these discussions.</p> <p>4. However, Fforwm Iaitn Môn see one fundamental weakness in the mitigation measure that once again raises suspicions regarding Horizon's understanding of language planning in mitigating impact. "Support immigrants to become part of the community"- in the context of the Welsh language in Anglesey this is meaningless unless it means that the developer is going to support incomers to learn Welsh. Fforwm Iaitn Môn needs more information – the role of Fforwm Iaitn Môn's partners should be considered to realise this.</p> <p>5. Appropriate training materials – it is not clear what is meant by this.</p> <p>6. Community language services – clarity needed. Uncertain whether translation equipment, or child care provision to immerse in Welsh is being offered here.</p> | <p>Horizon and Fforwm Iaitn Môn are in agreement that bilingual CIOs will be employed and funded by the project. The Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019) includes an obligation that Horizon will employ two CIOs and fund IACC to employ two CIOs as well as a Welsh language officer. The Welsh Language Officer and CIOs will lead on delivering community language services which could include developing appropriate training materials and deliver these to community groups.</p> <p>The Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019) includes an obligation to provide a Community Fund for the purpose of mitigating any intangible and residual impacts of the Wylfa Newydd Project on the communities in the Key Socio-economic Study Area (KSA) through schemes, measures and projects which promote the economic, social or environment well-being of those communities and enhances their quality of life. CIOs will support to groups wishing to access the Community Fund.</p> | Not agreed | |

¹⁶ Lyon, J. 1996. Becoming Bilingual: Language Acquisition in a Bilingual Community. Clevedon: Multilingual Matters.

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| | | | | <p>7. There are possible tensions that could arise for various reasons including language. Fforwm Iaitn Môn needs more information which indicates to what extent the police are receiving support to reduce these tensions, ensuring a bilingual workforce to work in the communities alongside CIO's.</p> <p>Potential community conflict: "Linguistic conflicts due to divided ethnic and national loyalties are often bitter and violent. In recent years, there have been major incidents in several countries, such as India, Spain, Canada (Quebec), Belgium, the USA, South Africa, and the Celtic-speaking areas of Britain. The reasons for conflict vary greatly. In some cases, the use of a language is declining, and the reaction is a desperate attempt to keep it, and the community it represents, alive. ... One reason is that language provides a particularly clear link with the past – often the only detailed link, in the form of literature." (page 303, 2006)¹⁷</p> | | | |
| | <p>Measure 19 of WLCMES Support early years provision</p> | <p>FfIM027</p> | <p>Welsh Language Impact Assessment Report (APP-428) (Appendix B4-1 Welsh Language and Culture Mitigation and Enhancement Strategy)</p> | <p>1. The second part of a mitigation measure is found here. The first part is to carry out forward planning with the data and investment being released by the developer beforehand so that the providers can arrange capacity (see the comments for FfIM 021). The second part of the mitigation will be to continue to monitor and continually respond and Fforwm Iaitn Môn welcome this.</p> <p>2. There is no commitment to invest here. Fforwm Iaitn Môn support the fact that this is part of the DCO s.106 which is a legal agreement but how will the other organisations such as Mudiad Meithrin and Menter Iaitn Môn gain access to real financial investment.</p> <p>3. Concern remains regarding lack of details e.g. reserve fund for this.</p> <p>4. Receiving this information in a timely manner is essential in order to plan the work of Menter Iaitn Môn, which does not have natural capacity to meet the demand without additional investment. It is not a natural growth in population, it is a direct response</p> | <p>In terms of early years provision, Schedule 6 of the Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019) notes that IACC may utilise the Education (Contingency) Fund for pre-school provision.</p> | <p>Not agreed</p> | |

¹⁷ 'How Language Works', David Crystal 2006

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| | | | | <p>to the Wylfa Newydd DCO Project, and the impact of that needs to be mitigated financially.</p> <ol style="list-style-type: none"> 5. The main role of Menter Iaitth Môn is to realise Theme 2, Welsh Government's 2050 Strategy namely to Increase Use of the Welsh Language. Without certainty for these actions, the development can undermine and counteract the work and investments of Mentrau, charities and organisations in Anglesey and the commitment of the partners of Fforwm Iaitth Môn to the Anglesey Language Strategy to reach 60% by 2021. 6. The Urdd has nurtured generations of young men and women to be proud of their country, open to the world and embodiments of our language and culture, as well as possessing the worldwide values that are respected in Wales. By now, over 4 million children and young people have been members of the Urdd since it was established in 1922. It is impossible to overemphasise the importance of the organisation in Wales. Its contribution to generations in Wales, to the lives, confidence and mental health our young people over the years has been massive. Certainty is needed that Horizon will support the efforts of Urdd Môn to continue with the above vision. 7. Roughly speaking, 9000 workers on an island with a population of 70,000 where 57% are Welsh speakers can mean 10% non-Welsh speakers, making Welsh a minority language, for the first time ever. In terms of language development, a community with less than 70% of Welsh speakers calls for proactive action to maintain the language. 8. Concern remains regarding the role of the WLCC in this stage. 9. Fforwm Iaitth Môn acknowledges that there are positive effects to be identified too, but without definite commitments it can undermine and counteract the work and investment of the Mentrau, charities and organisations in Anglesey over the decades. | | | |
| | Measure 20 of WLCMES | FfIM028 | Welsh Language Impact Assessment Report (APP-428) (Appendix B4-1 Welsh Language and Culture Mitigation and Enhancement Strategy) | <ol style="list-style-type: none"> 1. This appears to be a sensible mitigation measure and Fforwm Iaitth Môn urge the developer to hold the liaison meetings in Welsh and to acknowledge that the translation equipment is for non-Welsh speakers. It is not clear whether the developer is | Horizon and Fforwm Iaitth Môn are in agreement that a Community Translation Service will be funded through the Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019). | Not agreed | |

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| | Support a community translation service | | | <p>also funding the Services of the interpreter, namely the main cost over time.</p> <ol style="list-style-type: none"> 2. Community Councils and local organisations will welcome use of the translation service and equipment. 3. Fforwm Iaitn Môn are concerned, however, that the 'matter' referred to for this mitigation measure is "to mitigate the impact on the Welsh language as the result of the influx of workers who will not be living at home and their families from outside the main study area" – it does not appear that the measure corresponds to this problem, or simply scratches the surface. To reiterate, it does not appear that the developer is dealing with the seriousness of the threat to the Welsh language in our communities 4. 2001 - 60% Welsh speakers, 2011 - 57% Welsh speakers, Investment from the government, the county and agencies to overturn the percentage and to aim for 60.1% as part of the efforts of Cymraeg 2050. But now the influx of up to 9,000 non-Welsh speakers to the island – the scale is unprecedented and a real threat to the future of the language on the island. Translation equipment does not do justice to this serious 'matter' and once again undermines the credibility of the consultation on language planning to mitigate the impact of the development on our heritage. <p>"How languages die...Cultural assimilation is an even bigger threat. Much of the present crisis stems from the major cultural movements which began 500 years ago, as colonialism spread a small number of dominant languages, such as English, Spanish, Portuguese, and French, around the world. When one culture assimilates to another, the sequence of events affecting the endangered language seems to be the same everywhere.</p> <p>There are three broad stages. The first is immense pressure on the people to speak the dominant language – pressure that can come from political, social, or economic sources. It might be 'top down', in the form of incentives, recommendations... But wherever the pressure has come from, the result – stage two is a period of emerging bilingualism, as people become increasingly efficient in their new language while still retaining competence in their old. Then, often quite quickly, this bilingualism starts to decline, with the old language giving way to the new. This leads to the third stage in which the</p> | <p>This measure is supported by a number of others in helping to integrate workers and their families. Welcome packs will be provided to workers and their families. The CIOs and Welsh Language Officer, secured in the Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019), will contribute to integrating workers and their families as well as in building capacity and confidence among the local population. IACC as an employer will have a key role in shaping the roles of these officers.</p> <p>Community organisations will be able to apply to access the Community Fund secured in Schedule 12 of the Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019).</p> <p>The Welsh Language Education (Annual) Contribution and Welsh Language Education (Contingency) Fund will support the integration of workforce children.</p> <p>Horizon would provide language awareness training to all workers and welcome packs will be provided to all families. The Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019) states that Horizon will require provision of language and culture awareness training to the Workforce and will require staff members to demonstrate linguistic courtesy and awareness of the Welsh Language Policy.</p> | | |

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| | | | | <p>younger generation becomes increasingly proficient in the new language, identify more with it, and finding their first language less relevant to their new needs. This often accompanied by a feeling of shame about using the old language, on the part of the parents as well as their children. Parents use the old language less and less to their children, or in front of their children; and when more children come to be born within the new society, adults find fewer opportunities to use that language to them. Those families which do continue to use the language find there are fewer other families to talk to. Outside the home, the children stop talking to each other in the language. Within a generation – sometimes even within a decade – a healthy bilingualism within a family can slip into a self-conscious semilingualism, and thence into a monolingualism.” (page 337, 2006)¹⁸</p> | | | |
| Mitigation and enhancement measures relating to accountability | <p>Measure 21 of WLCMES</p> <p>Ensure internal oversight of the WLCMES and Horizon’s Welsh Language Policy</p> | FfIM 029 | <p>Welsh Language Impact Assessment Report (APP-428) (Appendix B4-1 Welsh Language and Culture Mitigation and Enhancement Strategy)</p> | <ol style="list-style-type: none"> Confirmation of the membership needed. As far as Fforwm Iaith Môn can see there is no ‘Strategy’, just a series of measures. Concern remains regarding carrying out the Strategy, as the commitments are bound to a DCO s.106, it is unclear how this Management Group will come within the structure after the agreement with the local authority has been formalised. Concern remains regarding the power of the Management Group to try to influence and effect some of Horizon’s decisions. Concern remains regarding the relationship of the WLCC with this group – lack of details and structure. The relationship between this Management Group and the Group of External Stakeholders is unclear (measure 22 – FfIM 030). <p>Regular reports on percentages of language speakers, the Welsh Government Language Strategy (Cymraeg 2050) and local Welsh language strategies should be standing items on the agenda</p> | <p>Horizon will establish an internal Horizon management group as secured in the Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019). The purpose of the group would be to:</p> <ul style="list-style-type: none"> provide internal oversight of the Developer’s Welsh language commitments and performance including its Welsh Language Policy; and assist the Welsh Language and Culture Coordinator in the delivery of the Welsh Language and Culture Mitigation and Enhancement Strategy. <p>Membership has not been decided but will include the Head of Strategic Development (Wales) and the WLCC. It is also likely to include the Horizon CIO as well as Horizon HR, supply chain, training, stakeholder management and communications staff. Some of the group (e.g. Head of Strategic Development Wales, the WLCC) will also be members of the Welsh Language and Culture Engagement Group.</p> | Not agreed | |

¹⁸ ‘How Language Works’, David Crystal 2006

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| | | | | in order to provide a wider context to what is happening in the area. | | | |
| | Measure 22 of WLCMES Ensure external oversight of the WLCMES | FfIM030 | Welsh Language Impact Assessment Report (APP-428) (Appendix B4-1 Welsh Language and Culture Mitigation and Enhancement Strategy) | <ol style="list-style-type: none"> 1. Fforwm Iaitth Môn welcome the establishment of an arms-length external Group but the role, the membership, expertise of the membership and the influence of the group is unclear. 2. The role of this Group with the DCO s.106 is unclear – Fforwm Iaitth Môn needs more information. 3. In order to make effective use of the time and expertise of local partners, we request a timetable and the arrangements for recording and monitoring the impact of the Group's actions. Recent experience of Horizon consultations demonstrates that the consultation is not taking place regularly enough and that the comments and feedback are not being recorded and reflected in Horizon's decisions at all times. 4. It is unclear whether the Group will reflect the interests of communities across the island. | <p>The Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019) notes that:</p> <p><i>From Implementation the Developer and the Council agree to constitute a Welsh Language and Culture Engagement Group. The Parties agree that:</i></p> <ul style="list-style-type: none"> • the invited membership of the Welsh Language and Culture Engagement Group will be a representative from each of the Council, the Developer, the Welsh Government, Gwynedd Council, Menter Môn, and Llais Ni; and • the Developer will fund an independent chair. <p><i>The Parties agree that the duties and responsibilities of the Welsh Language and Culture Engagement Group are:</i></p> <ul style="list-style-type: none"> • To monitor the implementation of the obligations on behalf of the Developer and the Council as set out in this Schedule 1; • Review monitoring returns provided to it in accordance with paragraph [10.4]; • To feed back to the Parties any issues relating to Welsh Language and culture as seen from the representatives' areas of expertise. | Not agreed | |
| | Measure 23 of WLCMES Evaluate the impact of the Project on Welsh language and culture | FfIM031 | Welsh Language Impact Assessment Report (APP-428) (Appendix B4-1 Welsh Language and Culture Mitigation and Enhancement Strategy) | <ol style="list-style-type: none"> 1. Clarity needed on the relationship of the groups. 2. There is uncertainty in terms of what overlaps measures 21 (FfIM 029) and 22 (FfIM 030). As well as local representation, it would be good to include a representative from the Unllais committee who would represent the entire island. | <p>Measure 21 the Welsh Language and Culture Engagement Group. Measure 22 relates to Horizon's internal management WLC group.</p> <p>The Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019) notes that:</p> <ul style="list-style-type: none"> • Horizon will, prior to Implementation, agree parameters for an annual evaluation of the impact of the Wylfa Newydd DCO Project on the Welsh language in the KSA with the Council and in consultation with the Welsh Government. • Horizon will thereafter undertake that annual evaluation in accordance with the approved parameters for the duration of the Construction Period and (5 years from the start of the Operational Period). | Not agreed | |
| | Measure 24 of WLCMES Evaluate the impact of the Project on Welsh | FfIM032 | Welsh Language Impact Assessment Report (APP-428) (Appendix B4-1 Welsh Language and Culture Mitigation and Enhancement Strategy) | <ol style="list-style-type: none"> 1. More details needed. It is not clear what the procedure is following the 10 years of construction. 2. Again clarity is needed, or a flowchart/Venn diagram to understand the inter-relationship between measure 21 (FfIM 029)/22 (FfIM 030)/23 (FfIM 031)/24 (FfIM 032) and the actions that will be | <p>Measure 21 the Welsh Language and Culture Engagement Group. Measure 22 relates to Horizon's internal management WLC group.</p> <p>The Draft DCO s.106 (shared with Welsh Government and IACC on 23 January 2019) notes which</p> | Not agreed | |

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| | language and culture | | | <p>taken when aspects of the mitigation measures have not been implemented effectively.</p> <p>3. Fforwm Iaitn Môn request that the developer agrees that the objective of the mitigation measures is to restore the Island to having 60.1% Welsh speakers. This does not take into consideration the further increase that would follow further investment by the partners post 2021 so it must be identified that the impact of the development on the Welsh language is negative. But bearing 60.1% in mind – Fforwm Iaitn Môn ask Horizon to provide a timetable of Horizon’s estimate for Welsh speakers on the island annually, and according to Horizon’s language research, by which year would Horizon have succeeded in mitigating the impact of the development on the Welsh language for the Isle of Anglesey Language Forum to achieve the target of 60% Welsh speakers on the island once more.</p> | obligations/measures relate to the construction and operational periods. | | |