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[8.25 Statement of Common Ground between Horizon Nuclear Power Wylfa Limited and NRW.PDF](#)
Importance: High

Good Evening

Please find attached Horizon's Deadline 2 submissions relating to :

- Statement of Common Ground Between Horizon Nuclear Power Wylfa Limited and Welsh Government
- Statement of Common Ground Between Horizon Nuclear Power Wylfa Limited and NRW

Kind Regards

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Wylfa Newydd Project

Statement of Common Ground between
Horizon Nuclear Power Wylfa Limited
and the Welsh Government

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Examination Deadline 2

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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') is being submitted to the Examining Authority as an agreed draft between both parties. It will be amended as the examination progresses in order to enable a final version to be submitted to the Examining Authority by Deadline 6.

1.2 Purpose of this document

- 1.2.1 This SoCG is a 'live' document that has been prepared by Horizon Nuclear Power (hereafter referred to as 'Horizon') and the Welsh Government. It has been prepared in accordance with the guidance published by the Department of Communities and Local Government (hereafter referred to as 'DCLG Guidance')¹ and example SoCG documents provided on the Planning Inspectorate's website².
- 1.2.2 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"*
- 1.2.3 The aim of this SoCG is to therefore provide a clear position of progress and extent of discussions and agreement reached between Horizon and the Welsh Government on matters relating to the Wylfa Newydd Project.
- 1.2.4 DCLG Guidance recognises and expects that the SoCG will continue to evolve during the examination period. Discussions between Horizon and the Welsh Government will therefore continue to seek to extend the areas of common ground.
- 1.2.5 The preparation of this SoCG is informed by a programme of discussions between Horizon and the Welsh Government. Discussions to inform the first draft SoCG were initially managed through Focus Group meetings, which were attended by the Welsh Government along with other parties including the Isle of Anglesey County Council (IACC) and Natural Resources Wales (NRW), and were held monthly up until May 2017 (see further detail at Table 1-1 below). They have since been replaced by SoCG Coordination Groups which meet twice monthly or monthly, as appropriate, supplemented by

¹ 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

² <https://infrastructure.planninginspectorate.gov.uk/application-process/example-documents/>

individual meetings with the Welsh Government on matters specific to the SoCG between it and Horizon.

- 1.2.6 This SoCG has evolved through a series of iterative drafts. The first draft of this SoCG was provided by Horizon on 7 August 2017, for input and comment by the Welsh Government. The purpose of the 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').
- 1.2.7 A series of topic-specific workshops were held between Welsh Government and Horizon Nuclear Power in August 2018. Please refer to Section 1.5 for further details.
- 1.2.8 The document will be updated as more information becomes available and as a result of on-going discussions between Horizon and the Welsh Government.
- 1.2.9 It is intended that the SoCG will provide information for the examination process, facilitating a smooth and efficient examination and managing the amount of material that needs to be submitted.
- 1.2.10 Once finalised, the SoCG will be 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 Role of Welsh Government in the DCO process

- 1.3.1 The Welsh Government is, in principle, supportive of a new nuclear facility at Wylfa in the context of energy security, contribution towards meeting its decarbonisation agenda, and the potential social and economic opportunities that could be provided over its lifetime for future generations. However, this support is conditional on all the potential impacts in relation to key areas of interest to the Welsh Government being sufficiently mitigated, and that in the event that there are any unmitigated costs these do not fall on the Welsh public purse, not least because Wales would be hosting infrastructure that will be of benefit to the whole of the United Kingdom.
- 1.3.2 Welsh Government has a general power under s60 Government of Wales Act 2006 ("the 2006 Act") to do anything which it considers is appropriate to achieve the promotion of economic, social or environmental well-being of Wales. Areas of responsibility which are devolved to Welsh Government pursuant to the 2006 Act (as amended by the Wales Act 2017) include;
- Economic development;
 - Education and training;
 - Environment;
 - Health and health services;
 - Highways and transport;

- Housing;
- Tourism;
- Planning; and
- Welsh Language.

- 1.3.3 The Welsh Government, as a devolved public body and is also under a duty pursuant to section 3 of the Well-Being of Future Generations Act 2015 (“the 2015 Act”) to carry out “sustainable development”. Consequently, Welsh Government is under a duty pursuant to s3 of the 2015 Act to take all reasonable steps in the exercise of its functions to meet the well-being objectives. Engaging in the DCO process and ensuring appropriate mitigation is secured, is consistent with that duty.
- 1.3.4 The Welsh Government is also a statutory consultee pursuant to the Planning Act 2008, as well as the relevant highway authority for the strategic road network and the provision of heritage advice through Cadw (the Welsh Government’s historic environment service).
- 1.3.5 The Welsh Government also have call-in powers for applications determined under the Town and Country Planning Act 1990 (as amended) and therefore may also have determining powers for the Site Preparation and Clearance application (see paragraph 1.4.2 and 1.4.3).
- 1.3.6 In addition, the Welsh Government will be the appellate body to which any appeal would be made under the DCO in respect of any application to discharge DCO requirements.
- 1.3.7 This SoCG is without prejudice to any role of the Welsh Government in the statutory planning process.

1.4 Description of Development

The Wylfa Newydd Project

- 1.4.1 The Wylfa Newydd Project includes:

The Enabling Works

- 1.4.2 The Enabling Works comprise the Site Preparation and Clearance Proposals (SPC Proposals) and the A5025 On-line Highway Improvements.
- 1.4.3 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 position with the SPC application was summarised in the SPC Status Note submitted to the Examining Authority by Horizon at Deadline 1.
- 1.4.4 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

1.4.5 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 temporary 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

1.4.6 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

1.4.7 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.

1.4.8 A more detailed description of development is contained at Chapter 4 of the Planning Statement (APP-406).

1.5 Consultation with Welsh Government

1.5.1 Horizon has engaged with the Welsh Government throughout the pre-application period. This was initially through a series of topic based Focus Groups. Please refer to the Main Consultation Report (APP-037) section 8.7 for further details. More recently, Horizon has held a series of topic specific SoCG sessions with Welsh Government between 8th and 31st August 2018.

1.5.2 In summary however, an overarching engagement framework with the Welsh Government (amongst others, including IACC and NRW) was established and agreed, as illustrated in Figure 1-1 below:

Figure 1-1 Wylfa Newydd Engagement Framework



- 1.5.3 Following Horizon's Stage Two Pre-Application Consultation, Horizon set up a series of topic based Focus Groups (see Table 1-1 below), which operated at Level 3 of the engagement framework set out in Figure 1-1 above. These were supplemented by more detailed Level 4 technical meetings on specific issues.
- 1.5.4 DCLG Guidance recognises that the topics on which agreement might be reached in any particular instance (or those areas where agreement might not be reached) will depend on the matters at issue and the circumstances of the case. The Focus Groups were intended to specifically address the issues raised by the Welsh Government and IACC in their responses to the consultation and to start to document matters relevant to SoCG. The topics of the Focus Groups, and the attendees, are listed in the table below, and also form the basis for the SoCG set out in Chapter 2.

Table 1-1 Focus Group Themes

Focus Group Theme	Attendance	Frequency
Welsh Language and Culture	IACC, Welsh Government, Welsh Language Impact Assessment Steering Group Chair	5 meetings between January and May 2017
Economic Development and Supply Chain	IACC, Welsh Government	4 meetings between January and May 2017
Tourism	IACC, Welsh Government, Gwynedd County Council	4 meetings between January and May 2017
Transport	IACC, Welsh Government, Gwynedd County Council	6 meetings between December 2016 and May 2017

Education, Skills and Labour	IACC, Welsh Government	4 meetings between January and May 2017
Health and Well Being	IACC, Welsh Government, NRW, BCUHB, Public Health Wales, Welsh Ambulance Service, North Wales Fire and Rescue, North Wales Police	4 meetings between January and May 2017
Housing/Accommodation Strategy	IACC, Welsh Government	4 meetings between January and May 2017
Environment	IACC, Welsh Government, NRW	2 meetings in February and March 2017

- 1.5.5 The Focus Groups informed the preparation of a SoCG tracker which recorded priority issues raised by IACC, Welsh Government and other Focus Group attendees in response to Horizon's Stage Two Pre-Application Consultation. In order to inform discussions at the Focus Groups, a series of Level 4 (technical) meetings were also held, as required, across a number of topics with IACC, Welsh Government and NRW and other statutory consultees, including National Trust, NWWT and RSPB. This included, for example, detailed discussions on housing and accommodation, transport and environmental matters such as impact on Sites of Special Scientific Interest (SSSI). Approximately five Focus Groups were held for each topic area, including a series of Focus Group meetings in May 2017 which were intended principally to confirm outstanding priority issues, particularly focussed on baseline and methodology, as the outcome of the assessments for many topic areas was not yet available.
- 1.5.6 In addition, a SoCG Coordination Group, attended by Horizon, IACC, Welsh Government and NRW, was held as required to discuss strategic and cross-cutting issues.
- 1.5.7 Horizon shared early draft application documents to support the DCO application with the Welsh Government, amongst other statutory consultees, in staggered phases between 31 August 2017 and 29 September 2017. Horizon then shared further documents with Welsh Government in October and November 2017. A workshop was held on 21 and 22 November 2017 with IACC and Welsh Government to discuss their comments on the draft documents, prior to these comments being issued in writing. Further draft and updated draft documents were shared with IACC and Welsh Government in December 2017 to seek to address concerns raised in the workshop regarding how mitigation would be secured, as summarised in section 8.7 of the Main Consultation Report (APP-037). Comments were not specifically invited on these documents, but both parties were encouraged to raise any issues through the SoCG process. Comments raised through this process have also served to develop this SoCG.

1.6 Post-Application Consultation

1.6.1 The Welsh Government made relevant representations on the DCO Application to the Planning Inspectorate on 10th August 2018.

1.6.2 Horizon held a series of topic specific meetings with the Welsh Government to seek to agree common ground as follows:

Table 1-2 Post-Submission Meetings with Welsh Government

Topic	Date
Historic Environment	8th August 2018
Health and Wellbeing	14 th August 2018
Environment	14 th August 2018
Welsh Language	15 th August 2018
ICT/Broadband	15 th August 2018
Tourism	23 rd August 2018
Education and Skills	23 rd August 2018
Transport	30 th August 2018
Housing	30 th August 2018
Economy and Supply Chain	31 st August 2018

1.6.3 Prior to each meeting, Welsh Government sent Horizon a series of questions to help inform the discussion of issues at the meeting. Horizon provided a response to these questions in advance of the meeting, which included an indication in respect of when certain requested information was not currently available.

1.6.4 Actions points were agreed at each meeting and Horizon provided responses to these where possible in advance of a meeting on the 10th October 2018, the purpose of which was to confirm draft positions in advance of the drafting of the SoCG for submission to the Planning Inspectorate on the 4th December 2018.

1.6.5 Chapter 3 of this SoCG represents the current position in respect of the main thematic areas of interest to the Welsh Government as agreed at the meeting of the 10th October 2018 and further to subsequent exchanges of the document in writing.

2 Project Vision and Objectives

2.1 Project Vision

2.1.1 Horizon's Vision is as follows:

"We believe there is a compelling requirement for new nuclear power in the UK to help tackle the vital and complex challenge of delivering a sustainable energy future. As part of this vision Horizon will deliver secure affordable, low carbon energy for present and future generations. Wylfa Newydd, Anglesey, North Wales is Horizon's prime site in the UK to develop new nuclear build, a 100-year project within the host community of Anglesey, from its development, construction, operation to de-commissioning. Wylfa Newydd will have a positive socio-economic impact especially on Anglesey, the wider North Wales region as well as Wales and the UK as a whole".

2.1.2 The Welsh Government's Vision is as follows:

"The Welsh Government seeks to maximise the legacy benefits to Ynys Mon, North Wales, and the rest of Wales from the Wylfa Newydd project, and to ensure through the DCO process that all negative impacts of this UK strategically important project on Wales are mitigated, in order to grow and sustain a vibrant nuclear sector that is capable of competing at a UK, European and global scale.

2.1.3 The four cross –cutting strategies in the Programme for Government are:

- Secure and Prosperous Wales;
- Healthy and Active Wales;
- Ambitious and Learning Wales; and
- United and Connected Wales.

2.1.4 The Welsh Government Cabinet has approved the following Legacy Principles in relation to Wylfa Newydd which would contribute directly to the delivery of these strategies:

- A higher skilled, qualified and experienced workforce;
- A more balanced and stronger economy;
- To protect and sustain cohesive communities serviced by 'fit for purpose' infrastructure;
- To create an environment where the Welsh language and culture is actively valued and promoted;
- 'Fit for purpose' infrastructure: road, rail, energy and telecommunications which serves the economy and communities of Wales;
- Permanent housing legacy;
- 'Fit for purpose' commercial and industrial property infrastructure;
- Greater sustainability in the tourism sector;

- Enhanced image and perception of Wales;
- Maintain and enhance Wales' natural environmental assets;
- An economic environment which supports and utilises research, development and innovation and specifically focuses on delivering world class centres of excellence in the region."

2.2 Project Objectives

2.2.1 Horizon and the Welsh Government recognise the 'once in a lifetime' investment opportunity presented by the Wylfa Newydd Project which can be a catalyst for the delivery of far reaching prosperity benefits. However, as stated in Welsh Government's relevant representation, Welsh Government's support is conditional on all the potential impacts in relation to key areas of interest to the Welsh Government being sufficiently mitigated.

2.2.2 Realising both parties' vision will be achieved through the following objectives to be achieved through the provision of appropriate mitigation either to be secured through an appropriately worded DCO requirement, or through an appropriate planning obligation within the s.106 agreement:

- Help to meet the energy challenge in the UK, by providing a reliable source of low carbon electricity;
- Complying with all safety and security requirements to ensure a secure and safe project with robust emergency planning;
- Provide employment through well paid jobs on fair and consistent terms for everyone working on the Project;
- Develop education and skills support for people of all ages and backgrounds to compete for the jobs on offer;
- Support for businesses to take up sourcing and supply chain opportunities;
- Promotes the sustainable movement of people and materials and provides resilient transportation infrastructure capable of attracting and sustaining economic growth and creating sustainable communities;
- Improvements in the quality of life and health and wellbeing of residents;
- Enhancement of Welsh Language and Culture;
- Develop a green and sustainable approach in the development and management of the buildings and operational activities;
- Be a good neighbour; keeping local disruption to a minimum throughout the project life cycle;
- Build on the legacy of the existing power station, and help to create a positive legacy for Anglesey; thinking about each significant investment and how it can create a positive future for the area, where appropriate;

- Ensure that all the elements are designed to connect with the varied beauty and character of Anglesey and conserves and enhances the Island's distinctive environment and resources, taking into account climate change, as much as possible;
- Respect and support cohesive local communities and ensure that the effect of the Project on them is minimised and that opportunities to provide enhancements are taken, as far as possible.
- Consideration of the wider spatial impacts of the proposed development in respect of North Wales and Wales.

3 Current Position

3.1 Position of Horizon Nuclear Power and the Welsh Government

- 3.1.1 The following schedule sets out the position of the Welsh Government alongside Horizon's position, following the series of topic specific meetings in respect of the key thematic areas of interest to the Welsh Government in relation to its devolved functions.
- 3.1.2 It is recognised that there are some aspects of this position which will not be completely consistent with the position confirmed in Horizon or Welsh Government's response to the Examining Authority's first written questions. This is reflective of the fact that this document reflects the state of agreement, and information available at the time of the meeting of the 10th October 2018, following which time was allowed for governance of both parties. These positions will be updated in subsequent versions of this SoCG.
- 3.1.3 For issues that are yet to be agreed, the intention is to provide a final position in subsequent versions of this SoCG, including to identify, if relevant, where further additional mitigation is proposed and how that is proposed to be secured through the DCO.

3.2 Welsh Language and Culture: The Golden Thread

- 3.2.1 Horizon Nuclear Power and Welsh Government agree that the Welsh language and culture is a cross cutting and relevant consideration to all thematic areas when looking at potential impacts from the Wylfa Newydd project. The following statement reflects the position of both parties:

Horizon fully embraces the importance of Welsh language and culture to the communities of Anglesey and North Wales and that they are integral elements of the social fabric of communities across Anglesey and Gwynedd. This is reflected in national and local language policies and strategies. Horizon acknowledge the national and local language strategies and where possible, seeks to support Welsh Government to work towards their ambition for the Welsh language to be used more extensively and for the number of Welsh speakers to grow towards one million people by 2050. Horizon want to work with communities to ensure that Welsh speakers (and learners) of working age have access to high quality, long-term employment on Anglesey and the wider North Wales region. This will provide an inherent stronger platform for the future viability of the Welsh language and culture on Anglesey and North Wales. Focus of mitigation and enhancement measures workshops reflected the key themes of IACC Welsh Language Strategy, which reflects Welsh Government strategy: a million Welsh speakers by 2050. It is agreed that the WLIA (APP-432) gives the appropriate consideration to adopted national and local language strategies as set out in Section A.2, volume A of the WLIA.

3.3 Need for New Nuclear Power and Principle of Development

Introduction

3.3.1 This section outlines matters relating to the need for new nuclear power and principle of development.

Matters Agreed

3.3.2 Table 3.1 sets out the matters which have been agreed between Welsh Government and Horizon at the time of drafting this version of the SoCG.

Table 3.1 Need for New Nuclear Power and Principle of Development

Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Need for the development	National Policy Statement	WG01	National Policy Statement for Energy (EN-1) National Policy Statement for Nuclear Generation (EN-6) Written Ministerial Statement (December 2017)	It is agreed that NPS EN-1 and NPS EN-6 identifies a need for new (and particularly low carbon) electricity NSIPs in the UK within the next 10-15 years, i.e. 2011 - 2025. It outlines the challenges facing the UK's energy security in light of the UK Government's carbon reduction objectives and notes that the UK not only needs a secure, diverse and reliable supply of electricity, but needs it in the context of reducing greenhouse gas emissions by at least 80% by 2050 (under the Climate Change Act 2008) (paras 3.3.14, 3.3.15). When considering "need" for the Power Station elements of the proposed development (as opposed to the associated development works included within the DCO) the Examining Authority, on behalf of the Secretary of State must look at the UK-wide need (NPS EN-1 paragraph 3.3). The same assessment of "need" is not necessary in respect of the associated development elements of the proposed development, although it is recognised that the Associated development included in this DCO (summarised in paragraph 1.4 above) provides the necessary facilities to ensure the delivery of the Power Station that meets the urgent need for nuclear power as early as possible in a safe and efficient manner in addition to providing mitigation for potential environmental impacts associated with the Project. Welsh Government's view on the principle of this Associated Development is considered further below in WGX04 and WG05		Matter Agreed No further action required.
Suitability of the Wylfa Newydd site	National Policy Statement	WG02	National Policy Statement for Nuclear Generation (EN-6) Written Ministerial Statement December 2017	The following statement is agreed by both parties. It is recognised that Wylfa Newydd is a potentially suitable site for the deployment of a new nuclear power station (paragraph 4.1.1 of NPS EN-6). Revisions to the construction programme show the deployment of Wylfa Newydd in 2027 (see below regarding construction programme). The Written Ministerial Statement of December 2017 clarifies that sites listed in the existing EN-6 on which a new nuclear power station is anticipated to deploy after 2025 will retain strong UK Government support during the designation of the new NPS. The application will be determined in accordance with s.105 Planning Act 2008 as opposed to s.104 PA 2008. NPS EN-1 and NPS EN-6 will therefore be an "important and relevant consideration". The emerging draft NPS for nuclear power generation for deployment after 2025 would also be a relevant consideration depending on the stage that it has reached when the DCO is considered and determined.		Matter Agreed No further action required.
Nuclear Waste	Storage and Disposal of Nuclear Waste	WG03	Energy Act 2008	The following statement is agreed by both parties. Extensive facilities for the treatment and disposal of radioactive waste currently exist in the UK and overseas. Lower activity radioactive waste generated by the Power Station will be transported off-site for treatment and disposal as soon as reasonably practicable. However, higher activity wastes and spent fuel which cannot be transported to an existing treatment or disposal facility during the operation of the Power Station will be stored safely on site until a Geological Disposal Facility (GDF) is available. This is in accordance with UK Government policy. Horizon is required under the Energy Act 2008 to have a UK Government approved funded Decommissioning Programme in place before nuclear related construction of the Power Station begins. This ensures that Horizon makes prudent provision for the full cost of decommissioning and for safely and securely managing and disposing of waste, including spent fuel. It is anticipated that Waste Transfer Contracts will be agreed with the UK Government, setting out the terms under which title and liability for spent fuel and higher activity waste would transfer from Horizon to the UK Government upon payment of a fee, for eventual disposal to the Geological Disposal Facility (GDF) after decommissioning of the Power Station.		Matter Agreed No further action required.
Associated development sites	Principle of development	WG04	Planning Statement (APP-406)	The principle of the location of the associated development sites is agreed, although it is noted that Welsh Government considers that further resilience is required in relation to the provision of park and ride facilities on the mainland (see section on Traffic and Transport for further details).		Matter Agreed No further action required.

Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Off-site Power Station facilities	Principle of development	WG05	Planning Statement (APP-406)	The principle of the location of the Off-site Power Station Facilities is agreed.		Matter Agreed No further action required.

3.4 Planning Policy

Introduction

3.4.1 This section outlines matters relating to planning policy which are relevant to the Wylfa Newydd DCO application.

Matters Agreed

3.4.2 Table 3.2 sets out the matters which have been agreed between the Welsh Government and Horizon at the time of drafting this version of the SoCG.

Table 3.2 Planning Policy – Matters Agreed

Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Relationship between National Policy Statement and Development Plan	WG06	Chapter 6 of the Planning Statement (APP-406).	It is agreed that the relationship between the National Policy Statements and the Development Plan is set out in the accompanying Planning Statement Chapter 6 (APP-406).		Matter Agreed No further action required.
National, Regional and Local Planning Policy	WG07	Chapter 5 of the Planning Statement (APP-406).	The adopted key national, regional and local planning policy documents relevant to the Wylfa Newydd DCO Project as set out, and identified, in chapter 5 of the Planning Statement (APP-406) are agreed. In addition, it is noted that a revised draft of Planning Policy Wales (PPW) Edition 10 was issued for consultation in February 2018. Horizon will address compliance with the revised draft PPW in their Written Representation.		Matter Agreed No further action required.
Weight to be given to extant and emerging national and local planning policy	WG08	Chapter 5 of the Planning Statement (APP-406)	The policy background to the Project is set out in chapter 5 and Appendix G of the Planning Statement. Paragraph 4.1.4 of NPS EN-1 states that the decision maker should take into account “environmental, social and economic benefits and adverse impacts, at national, regional and local levels” and that these may be identified in NPS EN-1, in the application or elsewhere (including in local impact reports). Paragraph 2.2.4 of NPS EN-1 recognises the role of the planning system to provide a framework which permits the types of infrastructure needed, where it is acceptable in planning terms. It sets out the importance of the planning system in ensuring that development consent decisions take into account view of affects communities and respect the principles of sustainable development. In terms of the weight to be applied to extant national and local planning policy Paragraph 4.1.5 of the NPS states: <i>“The policy set out in this NPS and the technology-specific energy NPSs is, for the most part, intended to make existing policy and practice of the Secretary of State in consenting nationally significant energy infrastructure clearer and more transparent, rather than to change the underlying policies against which applications are assessed (or therefore the “benchmark” for what is, or is not, an acceptable nationally significant energy development). Other matters that the IPC may consider both important and relevant to its decision-making may include Development Plan Documents or other documents in the Local Development Framework. In the event of a conflict between these or any other documents and an NPS, the NPS prevails for purposes of IPC decision making given the national significance of the infrastructure. The energy NPSs have taken account of relevant Planning Policy Statements (PPSs) and older-style Planning Policy Guidance Notes (PPGs) in England and Technical Advice Notes (TANs) in Wales where appropriate.”</i> It is recognised that for national and local planning policy published after the NPS (July 2011), consideration is required as to what weight should be applied, and ultimately this will be for the Examining Authority and UK SoS to determine.		Matter Agreed No further action required.

Matters Not Agreed

3.4.3 The following table sets out those aspects of ‘planning policy’ where Welsh Government and Horizon Nuclear Power have not yet reached agreement.

Table 3.3 Planning Policy – Matters Not Agreed

Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
National Policy Statement	WG09	National Policy Statement for Energy (EN-1) National Policy Statement for Nuclear Generation (EN-6) Chapters 5 and 6 of the Planning Statement (APP-406). Written Ministerial Statement December 2017	Both parties agree that the existing Overarching National Policy Statement for Energy (EN-1) and National Policy Statement for Nuclear Power Generation (EN-6) are the National Policy Statements relevant to the Wylfa Newydd DCO Project as set out in the accompanying Planning Statement Chapter 6 (APP-406). The emerging new NPS for nuclear power will also be an “important and relevant” consideration to the Secretary of State pursuant to s.105 PA 2008, in addition to any relevant national and local planning policy, which, in the context of S105(2)(c) of the Planning Act 2008 ,are “important and relevant considerations” which must also be afforded significant weight when assessing and determining the application, recognising that the planning policy model in Wales is different to England. It is agreed that the following planning policy documents are relevant material considerations and relevant to the consideration of the application; - Planning Policy Wales Edition 9 (November 2016) and 10 (Draft February 2018); - Technical Advice Notes (TANS). - TAN 1: Joint Housing Land Availability Studies (2015); - TAN 2: Planning and Affordable Housing (2006); - TAN 4: Retail and Commercial Development (2016); - TAN 5: Nature Conservation and Planning (2009); - TAN 6: Planning for Sustainable Rural Communities (2010); - TAN 12: Design (2016); - TAN 13: Tourism (1997)]; - TAN 18: Transport (2007); - TAN 19: Telecommunications (2002); - TAN 20: Planning and the Welsh Language (2017); - TAN 21: Waste (2014); - TAN 23: Economic Development (2014); - TAN 24: The Historic Environment (2017); Welsh Government will also set out the relevant national policy considerations in their Written Representations.	Horizon agrees with the Welsh Government’s Statement, except in relation to the weight to be afforded to relevant national and local planning policy. The Written Ministerial Statement of December 2017 makes it clear at paragraph 1.23 that the: “Government is confident that both EN-1 and EN-6 incorporate information, assessments and statements which will continue to be important and relevant for projects which will deploy after 2025 including statements concerning the need for nuclear power – as well as environmental and other assessments that continue to be relevant for those projects. As such, in deciding whether or not to grant development consent for such a project, the Secretary of State would be required, under 105(2)(c) of the Act, to have regard to the content of EN-1 and EN-6, unless they have been suspended or revoked. In respect of matters where there is no material change in circumstances it is likely that significant weight would be given to the policy in EN-1 and EN-6.” As neither EN-1 and EN-6 have been suspended or revoked, they continue to have significant weight. Horizon considers that the NPS has equal weight in Wales as it does in England and that national and local planning policy can be important and relevant considerations in determining the application under S105 of the Planning Act, but in areas of conflict that the NPS takes precedence (see WG10 below).	Matter not Agreed
Technical Advice Notes	WG10	Chapter 5 and Appendix A-F of the Planning Statement (APP-406)	Technical Advice Notes (TANs) relevant to the Wylfa Newydd DCO Project are set out, and identified, in WG09. The weight to be given to these is as set out in WG09. These are considered to be important and relevant considerations for the purposes of Section 105 of the Act, to the extent that they have relevance to the Wylfa Newydd DCO Project.	Horizon agrees that the TANs listed at WG09 are the relevant ones for the consideration of the Wylfa Newydd Project. These are considered to be important and relevant considerations for the purposes of Section 105 of the Act, to the extent that they have relevance to the Wylfa Newydd DCO Project, but in the event of any conflict the NPS takes primacy for the purposes of decision making.	Matter not Agreed

3.5 Cumulative Effects

Introduction

3.5.1 This section outlines matters relating to cumulative effects which are relevant to the Wylfa Newydd DCO application.

Matters Agreed

3.5.2 The following table sets out matters related to cumulative effects that are agreed.

Table 3.4 Cumulative effects – Matters Agreed

Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Stena Line, Holyhead Port	WG11	ES Volume I: Cumulative Impact Assessment (APP-384 to APP-397)	The Stena Line Ports Ltd proposal to develop Holyhead Port [AN30] has been included in the cumulative effects assessment.		Matter agreed No further action required.
List of RFFPS	WG12	ES Volume I: Cumulative Impact Assessment (APP-384 to APP-397)	It is agreed that the list of Reasonably Foreseeable Future Projects for the purposes of the Cumulative Impact Assessment is appropriate. However, Welsh Government does not agree with the status of all projects listed. Please refer to WG13 and WG14 .		Matter agreed with the exception of the status of those projects referred to in WG13 and WG14. No further action required.

Matters Not Agreed

3.5.3 The following table sets out matters related to cumulative effects where Welsh Government and Horizon Nuclear Power have not reached agreement.

Table 3.5 Cumulative effects – Matters Not Agreed

Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Third Menai Crossing (AN22)	WG13	ES Volume I: Cumulative Impact Assessment (APP-384 to APP-397)	This project is recognised as having the potential for cumulative effects in respect of the proposed development. Following the announcement, by Welsh Government’s First Minister on Thursday 11 October 2018 there is now a preferred route for the proposed Third Menai Crossing. The cumulative effects of that project should therefore now be fully assessed.	The Third Menai Crossing project is recognised in the ES (APP-384) as having the potential for cumulative effects and it is acknowledged that there is now a preferred route however the lack of environmental and traffic information on effects means that it has not been included in the assessment at this stage. In the event that further information becomes available during the course of the examination, supplementary assessment can be undertaken, where this could be achieved within the examination timetable. It is also recognised that any ES for the Third Menai Crossing would need to take into account any cumulative effects with the Wylfa Newydd Project.	Matter not agreed In the event that further information becomes available, supplementary assessment can be undertaken.

Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Dwr Cymru Welsh Water Wastewater Treatment Works (AN26)	WG14	ES Volume I: Cumulative Impact Assessment (APP-384 to APP-397)	Welsh Government is aware that further information is available on the Dwr Cymru Welsh Water Wastewater Treatment Works (AN26) and request that this is considered as part of the DCO application.	The Dwr Cymru Welsh Water Wastewater Treatment Works project is recognised in the ES (APP-384) as having the potential for cumulative effects however the lack of environmental and traffic information on effects means that it has not been included in the assessment at this stage. In the event that further information becomes available during the course of the examination, supplementary assessment can be undertaken, where this could be achieved within the examination timetable. It is also recognised that any ES for the Dwr Cymru WWTW would need to take into account any cumulative effects with the Wylfa Newydd Project.	Matter not agreed In the event that further information becomes available, supplementary assessment can be undertaken.

3.6 Welsh Language and Culture

Introduction

3.6.1 Welsh Government, through *Cymraeg 2050: Welsh Language Strategy*, is committed to increasing the number of Welsh speakers, increasing the use of Welsh, and creating favourable conditions for Welsh language and culture through strategic frameworks, programmes and planning policy. As stated in Welsh Government's Relevant Representation (submitted to PINS on 10 August 2018), Welsh Government welcome the 24 mitigation measures proposed in the Welsh Language Impact Assessment (Application Reference 8.21), but further detail and discussions are required before Welsh Government can agree to all matters presented in this section.

Matters Agreed

3.6.2 The following table sets out matters related to Welsh Language and Culture that are agreed.

Table 3.6 Welsh Language and Culture – Matters Agreed

Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Method	Welsh Language Impact Assessment Methodology (WLMA)	WG15	Welsh Language Impact Assessment (APP-432 and APP-433)	The WLIA methodology is agreed.		Matter Agreed No further action required.
Method	WLIA Study Area	WG16	Welsh Language Impact Assessment (APP-432 and APP-433)	The WLIA Study Area is agreed.		Matter Agreed No further action required.
Method	Assumptions, methodology, and purpose of Gravity Model	WG17	Welsh Language Impact Assessment (APP-432 and APP-433)	The assumptions, methodology and purpose of the Gravity Model has been discussed between both parties and there is agreement that the Gravity Model presents a best fit approach to inform assessments of distribution of construction workers.		Matter Agreed No further action required.
Modelling and Assumptions	Modelling and Assumptions	WG18	Welsh Language Impact Assessment (APP-432 and APP-433) and ES Volume C - Project-wide effects Socio-economic technical appendix (APP-096)	Welsh Government acknowledge that Horizon have provided the appropriate detail on the number of dependents assumed as part of the Welsh Language assessment. Welsh Government welcomes the commitment to monitoring the effects of the Wylfa Newydd project. The detail of the proposed mitigation measure and how such mitigation is to be secured are matters which are yet to be agreed.	Horizon assumptions regarding number of dependents during construction are set out in the Welsh Language Impact Assessment (APP-432) sections B.4.375 to B.4.382. Assumptions regarding the number of dependents during operation are set out in sections B.4.352 to B.4.355. Horizon has committed to monitoring the effects of the Project through the WAMS (APP-412 and APP-413), and developing appropriate mitigation. Horizon will develop a monitoring strategy for further discussion with Welsh Government.	Matter Agreed To agree details of proposed mitigation and method for security of mitigation.
Baseline and Data Collection	WLIA Baseline	WG19	Welsh Language Impact Assessment (APP-432 and APP-433)	The WLIA baseline is agreed.		Matter Agreed No further action required.
Baseline and Data Collection	National and Local Language Policies	WG20	Welsh Language Impact Assessment (APP-432 and APP-433)	Horizon acknowledge the national and local language strategies and where possible, seeks to support Welsh Government. Focus of mitigation and enhancement measures workshops reflected the key themes of IACC Welsh Language Strategy, which reflects Welsh Government strategy: a million Welsh speakers by 2050. It is agreed that the WLIA gives the appropriate consideration to adopted national and local language strategies as set out in the WLIA.		Matter Agreed No further action required.

Ongoing Matters

3.6.3 The following table sets out those matters relating to Welsh Language and Culture where Welsh Government and Horizon have not yet reached agreement. Principally, this relates to:

- Detailed measures within the Welsh Language & Culture Mitigation and Enhancement Strategy (WLCMES);
- Sensitivity testing of construction workers and their distribution within the study area; and
- Code of Construction Practice (approach to monitoring impacts and mitigation for Welsh language and culture).

Table 3.7 Welsh Language and Culture – Ongoing Matters

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Method	Distribution of construction workers (outside of the Site Campus)	WG21	ES Volume C - Project-wide effects Socio-economic technical appendix (APP-096)	Welsh Government has requested further sensitivity analysis of the distribution of non-home-based construction workers to inform potential future scenarios and monitoring requirements. Area based targets through the Worker Accommodation Management Strategy (WAMS) could be used to monitor and manage the effect of worker choices on Welsh language. Welsh Government would like these targets to be agreed through the Welsh Language and Culture Sub-Group.	It is agreed that further sensitivity tests will be carried out following submission of the DCO to inform potential future scenarios and these are considered further in relation to transport issues below in section 3.9.	Ongoing Matter Horizon has agreed to share details of the high-level sensitivity testing which has been carried out in relation to different scenarios for construction workers. This will be submitted to the examination when it is available.
Method	Range of Scenarios assessed as part of the WLIA	WG22	Welsh Language Impact Assessment (APP-432 and APP-433) Workforce Accommodation Strategy (APP-412)	Welsh Government has requested further sensitivity testing regarding the overall distribution of construction workers.	It is agreed between both parties that the WLIA (APP-432 and APP-433) is based on a worst-case scenario for Welsh Language and that the assessment within the WLIA will not therefore consider a range of scenarios. Horizon has however agreed to do sensitivity testing for the ES based on scenarios including a greater number of non-home based workers living on Anglesey. The Worker Accommodation Management Service secured through the draft s.106 agreement will consider a range of monitoring indicators when setting thresholds and managing the location of the workforce, including impact on Welsh language and culture.	Ongoing Matter Horizon has agreed to carry out sensitivity testing to examine the potential effects if the distribution of workers was different and whether this would make a difference to the mitigation proposed. This will be submitted to the examination when it is available.
Mitigation	Welsh Language and Culture Mitigation and Enhancement Strategy (WLCMES): Lack of details with regards to proposed timescales for delivery of mitigation and enhancement measures.	WG23	Welsh Language Impact Assessment (APP-432 and APP-433)	Whilst the mitigation measures proposed within the Welsh Language and Culture Mitigation and Enhancement Strategy (WLCMES) are a good starting point, Welsh Government's position is that there is insufficient detail in the WLCMES to ensure the mitigation measures will be implemented effectively. General concerns: • Trigger points do not go far enough to determine when each mitigation measure will need to be implemented. Welsh Government wish to see clearer timeframes and triggers for all mitigation measures. • Very little information has been provided on how all the impacts will be monitored and mitigation secured/implemented. Further details must be provided on how the Major Permissions Oversight Panel and Sub-Groups will manage each of the measures. Welsh Government request a commitment to monitoring this number through the Worker Accommodation Management Service (WAMS) and	Horizon has committed to collecting information on workers, their dependants and their linguistic capabilities, using unique IDs for data protection purposes. This can inform both the targeting of WLCMES measures and the WAMS, which will need to balance a range of effects when deciding whether to turn accommodation on or off in particular areas. Horizon has issued draft terms of reference for the Wylfa Newydd Major Permissions Oversight Panel (WNMPOP) and sub-groups to Welsh Government and IACC for comment and welcomes further discussion with Welsh Government and other stakeholders. Amongst other things, this recognises the role of the Welsh Language and Culture sub-group in monitoring the implementation of the WLCMES. Details of timing of mitigation, how this will be secured, and the appropriate triggers are set out in the WLCMES in the WLIA (APP-432) as follows: • Table 3-1 Summary of mitigation and enhancement measures relating to the workforce • Table 3.2 Summary of mitigation and enhancement measures relating to children, young people and families • Table 3-3 Summary of mitigation and enhancement measures	Ongoing Matter Horizon has provided (12.11.18) draft terms of reference for the WNMPOP for comment to Welsh Government and IACC. Further discussions between Welsh Government, IACC and Horizon are required in relation to this matter.

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
				developing mitigation to address any impacts which may arise. WG have requested to see more detail included in the CoCP in respect of the WNMPOP and sub groups in relation to how impacts will be monitored, how mitigation will be secured, including inclusion of appropriate triggers and greater certainty around availability of mitigation funds and how they will be delivered.	relating to community and local services The measures in the WLCMES are secured through the s.106 agreement.	
Mitigation	WLCMES: Welsh Language Strategy & Language Skills Competency Framework and Assessment Tool	WG24		Welsh Government is looking for a commitment from Horizon to appoint the Welsh Language and Culture Co-ordinator (WL&CC) as soon as possible. Welsh Government is looking for a firm commitment on the delivery of the Welsh language Strategy and Language Skills Competency Framework and Assessment Tool. Horizon are already recruiting for the project; Welsh Government has had no clarity or information on how they are assessing the Welsh language requirements of those posts. Welsh Government has provided guidance to Horizon on sifting Welsh application forms and deciding what language to use during interviews – document reference ' <i>Guidance on sifting Welsh application forms and deciding what language to use during interviews</i> '.	Horizon has now appointed the Welsh Language and Culture Co-ordinator and they started in post on the 5 th November 2018. The WLCMES states that Horizon will develop and implement a Welsh language skills competency framework using a recognised model such as the Association of Language Testers in Europe (ALTE) levels 0-5 (APP-432 and 433, paragraph 4.2.19). This framework will draw on good practice from other organisations (e.g. North Wales Police, Ceredigion Council) and will enable Horizon to formally record the Welsh language skill level required for relevant posts at Wylfa Newydd. Horizon will seek the advice of the National Centre for Learning Welsh in developing this framework. The WLCMES measures are secured through the draft s.106 agreement.	Ongoing matter Further discussions between Welsh Government and Horizon are required in relation to the matter.
Mitigation	WLCMES: National Centre for Learning Welsh	WG25	Welsh Language Impact Assessment (APP-432 and APP-433)	Welsh Government would like further clarity and certainty on the role of the National Centre for Learning Welsh as part of the Welsh Language Skills Strategy and mitigation proposals.	The role of the National Centre for Learning Welsh is set out in the WLIA. Horizon will be able to provide further clarity on the specific role at the appropriate stages identified in the WLIA (APP-432 and 433) and once the Examination of the application for development consent has closed.	Ongoing matter Further discussions between Welsh Government and Horizon are required in relation to the matter.
Mitigation	WLCMES: Peripatetic teachers	WG26	Welsh Language Impact Assessment (APP-432 and APP-433)	Welsh Government will await further information from Horizon on the proposed timing of funding for the peripatetic teacher service. There is currently no provision for offering this mitigation measure in a timely manner. Welsh Government need assurances that the provision will be available to children who move to the area without delay – that is, they will start on the immersion provision immediately after they move to the area. Not doing so will have a detrimental effect on the children and the community.	The draft s.106 agreement issued to Welsh Government on 25 th October 2018 included the provision of funding (but not quantum) for up to two peripatetic teachers, with payments to be made annually and the first payment on implementation.	Ongoing matter Welsh Government to consider timing of mitigation and whether they are content with the provisions in the draft s.106.

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Mitigation	WLCMES: The role of the Welsh language in the recruitment process	WG27	Welsh Language Impact Assessment (APP-432 and APP-433)	Welsh Government is looking for a commitment from Horizon to ensure the provision of Welsh language is made available to all job applicants. Welsh Government has provided guidance to Horizon on sifting Welsh application forms and deciding what language to use during interviews.	The WLCMES in the WLIA (APP-432 and 433) includes the following measure: <i>“Horizon will ensure a Welsh-speaking member of staff is included on interview panels for jobs where candidates are required to have Welsh language skills so that the candidate's linguistic skills can be properly assessed.”</i> This is secured through Schedule 1 clause 1.3 of the draft s.106 agreement. In addition, Horizon is proposing a change to the Welsh language mitigation measures (and a corresponding clause in the draft s.106) to ensure that where practicable, Horizon will also include a Welsh speaker on prospective Horizon employee interview panels for other applicants whose preferred language is Welsh.	Ongoing matter Welsh Government will review the proposed change and confirm if this matter can now be agreed.
Mitigation	WLCMES: Community Involvement Officers and community languages services	WG28	Welsh Language Impact Assessment (APP-432 and APP-433)	Welsh Government has requested further information about how the Community Involvement Officers will work with the Welsh Language and Culture Coordinator and Menter Môn.	The Welsh Language and Culture Coordinator and the Community Involvement Officers are secured by the draft s.106 agreement. Horizon considers that this level of detail, which relates to detailed ways of working, can be agreed by the Welsh Language and Culture sub-group.	Ongoing matter Further discussions between Welsh Government and Horizon are required in relation to the matter.
Mitigation and monitoring	Code of Construction Practice (CoCP) - Approach to monitoring	WG29	Welsh Language Impact Assessment (APP-432 and APP-433) and Workforce Accommodation Strategy (APP-412)	Welsh Government considers that there should be continuous monitoring of workers and the developing patterns of where they choose to live to determine impacts in sensitive linguistic communities.	Horizon agree that monitoring is appropriate, but that this should be proportionate. Horizon has shared a draft approach to monitoring with Welsh Government and this is provided within the Wylfa Newydd CoCP submitted with the DCO application (APP-414) and the subsequent draft terms of reference for the WNMPOP which has been issued as a draft for discussion. This framework includes nine engagement sub-groups, including one in relation to Welsh Language and Culture who would be responsible for considering monitoring reports, amongst other things, and recommending appropriate actions to a Programme Board (now WNMPOP), who would make decisions in relation to mitigation, for example, the use of contingency funding secured through planning obligations. The mitigation framework states that it is envisaged that Welsh Government would be a member of the Programme Board (now WNMPOP). The Workforce Accommodation Strategy (APP-412) states at paragraph 9.2.5: <i>“It will also mean collecting monitoring data and reporting on it to stakeholders and using that data to help guide workers’ choices and achieve better outcomes for local communities. Monitoring will also help inform and target mitigation measures, for example those aimed at the Welsh language and culture.”</i> The draft s106 agreement which has been shared with Welsh Government includes a clause which requires Horizon to provide quarterly monitoring reports in relation to workers choices including the location and type of accommodation.	Ongoing matter Horizon has provided (12.11.18) draft Terms of reference for Major Permissions Oversight Panel and Sub-Groups to confirm governance process, responsibilities, and members. Further discussions between Welsh Government and Horizon are required in relation to the matter.

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Monitoring	Increased demand for accommodation affecting affordability of housing for local people	WG30	Volumes B of WLIA and WL&CMES - Appendix I1 (APP-432)	Welsh Government consider that there should be continuous monitoring of workers and the developing patterns of where they choose to live to determine impacts in sensitive linguistic communities in respect of housing affordability, and the risk of displacement of Welsh speakers from the community.	See Horizon position on WG30	Ongoing matter Horizon has provided (12.11.18) draft Terms of reference for Major Permissions Oversight Panel and Sub-Groups to confirm governance process, responsibilities, and members. Further discussions between Welsh Government and Horizon are required in relation to the matter.

Matters Not Agreed

3.6.4 There are currently no aspects of Welsh Language and Culture which are not agreed between the Welsh Government and Horizon.

3.7 Economic Development and Supply Chain

Introduction

3.7.1 Wylfa Newydd is one of the largest investments in Wales in a generation and provides the potential to make a significant contribution to the North Wales economy. If the activity of all stakeholders can be aligned to induce the maximum impact, the legacy benefit of the project’s investment could be substantial. However, the Welsh Government considers that the potential impact of economic displacement in the region arising from such a large development should not be underestimated and wish to ensure that any adverse effects are adequately mitigated. Whilst Horizon accepts that there is a risk of displacement, the scale and impact of this potential risk is not agreed; nevertheless, Horizon has been working with Welsh Government to identify appropriate mitigation strategies.

Matters Agreed

3.7.2 The following table sets out those aspects of the potential impacts on economic development and supply chain that are agreed.

Table 3.8 – Economic Development and Supply Chain – Matters Agreed

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Over-arching Strategy	Supply Chain Action Plan	WG31	Environmental Statement chapter C1 - Project wide effects - Socio-Economics (APP-088)	It is agreed that a Supply Chain Action Plan should be provided as part of the Wylfa Newydd Project.		Matter Agreed Horizon to share a draft Supply Chain Action Plan with Welsh Government for discussion (see WG35 below).
Mitigation	Supply Chain Portal	WG32	Environmental Statement chapter C1 - Project wide effects - Socio-Economics (APP-088)	It is agreed that a Supply Chain Portal should be developed to enable local and wider North Wales businesses to access the opportunities available through the Project. The operation and maintenance of the Supply Chain Portal is secured through the draft s106 agreement which has been shared with Welsh Government. However this is still under discussion, particularly in respect of the detail in respect of how the Supply Chain Portal is secured, and thereafter maintained and operated. – see WG35 below.		Matter Agreed
Mitigation	Setting of targets for local jobs or local investment values	WG33	Environmental Statement chapter C1 - Project wide effects - Socio-Economics (APP-088)	It is agreed that specific targets for local jobs and investment values should not be set but Key Performance Indicators’ (KPI) and monitoring would be more appropriate. This would be monitored by the Supply Chain sub-group.		Matter Agreed

Ongoing Matters

3.7.3 The following table sets out those issues relating to Economic Development and Supply Chain where Welsh Government and Horizon Nuclear Power have not yet reached agreement. Principally, this relates to:

- Wylfa Newydd Supply Chain Action Plan;
- Reliability of baseline information to inform socioeconomic assessment;
- Supply Chain Service; and
- Supply chain targets.

Table 3.9 – Economic Development and Supply Chain – Ongoing Matters

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Over-arching Strategy	Supply Chain Action Plan	WG34	Environmental Statement chapter C1 - Project wide effects - Socio-Economics (APP-088)	Welsh Government considers that the information that has been shared to date on Supply Chain is too vague and that further urgent engagement is required on how Horizon intends to develop a Supply Chain Action Plan that enables local firms to compete for the opportunities available on the Wylfa Newydd Project.	Horizon is developing the Supply Chain Action Plan in consultation with Welsh Government and IACC in accordance with the timescale indicated under further actions. Chapter C1 of the ES (APP-088) includes principles for engagement with the Supply Chain, which will provide some assurance on how Horizon intends to ensure that local companies can actively compete for supply chain opportunities. The Supply Chain Action Plan will be appended to the final draft s106 to be submitted to the Examining Authority.	Ongoing matter Horizon have confirmed the following next steps for delivery of the Supply Chain Action Plan: • Horizon held initial workshop and shared initial thoughts on the draft SCAP. • 11th December 2018 - issue draft for circulation to the Wylfa Newydd Supply Chain Group Members. • January 2019 – share final draft SCAP for comment from stakeholders ahead of including in draft s.106 agreement. • February 2019 issue first revision of Wylfa Newydd Supply Chain Action Plan for wider circulation.
Baseline	North Wales Economic Board Survey (2015)	WG35	Environmental Statement chapter C1 - Project wide effects - Socio-Economics (APP-088)	Welsh Government has noted that the DCO documents rely on the North Wales Economic Board Survey (2015) which had a poor response rate. Although possibly unavoidable due to timescales, it is noted that the economic data was collected during the recession, where there was a greater availability of labour. There needs to be a contingency which recognises the uncertainty and limitations of the baseline.	It should be noted that the assessment of effects on the local labour market as presented in the DCO are not solely based on survey responses, but also the consideration of existing turnover in the market, the good practice mitigation in place, and recognition of the local concerns raised on the issues. The details of the business survey are outlined in socio-economic technical appendix (APP-096), section 5.2. It is noted that the purpose of undertaking the survey was to gauge the sentiment among North Wales businesses about general business conditions and the Wylfa Newydd Project. The business survey received a total of 376 responses. It is Horizons position that this response rate is very good and provides a robust response from the business sector to the questions asked. Table 5-1 in that report shows that more than two fifths of respondents (43%) were located on Anglesey, with 53% from elsewhere in North Wales and the remainder not providing a response to that question.	Ongoing Matter Further discussions between Welsh Government and Horizon are required in relation to the matter.

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Mitigation	Setting of targets for local jobs or local investment values	WG36	Supply Chain Service Action Plan	Further discussion is required in relation to the approach to monitoring Supply Chain opportunities, but this could potentially be done through the Supply Chain Portal.	The draft s.106 shared with Welsh Government includes commitments in relation to monitoring the effectiveness of the Supply Chain Portal through the Supply Chain sub-group. KPIs would be agreed by the Supply Chain sub-group, of which the Welsh Government is part.	Ongoing matter Horizon to work with Welsh Government and Isle of Anglesey County Council (IACC) to develop KPIs for inclusion in Supply Chain Action Plan. Further information to be provided from Horizon to Welsh Government in respect of how a Supply Chain Service will be secured and implemented. Subject to the resolution of these KPIs, it is understood that this matter could then move to "agreed".

Matters Not Agreed

3.7.4 There are currently no aspects of Economic Development and Supply Chain which are not agreed between the Welsh Government and Horizon, although it is recognised that there are ongoing matters relating to scale and impact of potential displacement risk.

3.8 Tourism

Introduction

3.8.1 Welsh Government considers that the construction and operation of Wylfa Newydd is likely to have significant effects on the tourism sector in Anglesey with wider impacts felt within Gwynedd and Conwy. It is the objective of Welsh Government to ensure mitigation for the tourism sector, from both the short and long term adverse impacts associated with Wylfa Newydd, and continue to grow a world-class sector. Horizon agree with the importance of the tourism sector to Anglesey and north Wales, but do not agree that the Wylfa Newydd Project will have significant impacts.

Matters Agreed

3.8.2 The following table sets out those aspects of the potential impacts on tourism that are agreed.

Table 3.10 Tourism – Matters Agreed

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Method	Scope of Assessment	WG37	Environmental Statement chapter C1 - Project wide effects - Socio-Economics (APP-088)	The scope of the assessment for tourism, including the consideration of short and long-term effects such as; potential reduction of visitors to attractions; potentially reduced quality of accommodation stock and potential risk of trading down of food offer is agreed.		Matter Agreed No further action required – Welsh Government to confirm.

Ongoing Matters

3.8.3 The following table sets out those issues relating to Tourism where Welsh Government and Horizon Nuclear Power have not yet reached agreement. Principally, this relates to:

- The baseline and expected impacts reported in the tourism impact assessment;
- Mitigation and monitoring proposals for predicted impacts on tourism sector; and
- Tourism legacy commitments.

Table 3.11 Tourism – Ongoing Matters

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Method	Study Area	WG38	Environmental Statement chapter C1 - Project wide effects - Socio-Economics (APP-088)	Welsh Government considers that further consideration should be given to the value to tourism on the wider North Wales region given the reliance on the A55 North Wales Expressway (particularly in the early years of construction). Welsh Government has completed further research into the estimated tourism value against the 60-minute and 90-minute drive times from site: • 60 mins - The estimated tourism economic impact in this area for 2017 was £703 million. • 90 Mins - The estimated tourism economic impact in this area for 2017 was £2.26 billion.	The assessment of the effects of the project on tourism are considered within the Key Study Area, which includes Anglesey and parts of the Menai mainland. Impacts are not considered beyond this area as it is not anticipated that significant effects would occur.	Ongoing Matter Further discussions between Welsh Government and Horizon are required in relation to this matter.

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Baseline and Data Collection	Visitor Behaviour Study (VBS)	WG39	Environmental Statement chapter C1 - Project wide effects - Socio-Economics (APP-088)	Welsh Government considers the Visitor Behaviour Study conducted to inform the baseline of the tourism impact assessment is outdated and does not reflect the current understanding, scale, and impacts of the Wylfa Newydd project. However, Welsh Government agree that a Visitor Behaviour Survey, with an agreed methodology and scope, is one of the tools available that can help inform the evidence base to support the monitoring and effective implementation of a Tourism Action Plan.	Previous versions of this SoCG agreed that the VBS formed an appropriate baseline in the absence of any more up to date survey data. Horizon has used a number of existing sources to determine supply in the tourism sector which are set out in the Socio-economic Technical Appendix (APP-096). IACC undertook a Tourism Bedstock Survey with the results published in June 2018. Horizon's view is that this does not alter the assessment in terms of availability of accommodation, particularly given the relatively low percentage of accommodation in the sector that is anticipated to be required by the Wylfa Newydd workforce. Horizon's position is confirmed within the Chapter C1 (Project-wide effects – Socio-economics) (APP-088). This assumes that 450 bed spaces within the KSA could be potentially occupied by Wylfa Newydd workers, which would equate to 14% of the available headroom in the August peak season according to Horizon's assessment. Notwithstanding this, Horizon has proposed in the draft s.106 issued to Welsh Government contributions towards tourism surveys to be carried out by the Welsh Government which would be used to monitor the effects of the Wylfa Newydd Project on tourism accommodation and a Tourism Contingency Fund which could provide mitigation to address this, where a significant effect was evidenced.	Ongoing Matter Further discussions between Welsh Government and Horizon are required in relation to this matter.
Baseline and Data Collection	Baseline Capacity of Tourism Stock	WG40	Environmental Statement chapter C1 - Project wide effects - Socio-Economics (APP-088)	Evidence captured through the IACC bed stock survey (2018) and IACC JLP Tourism Topic Paper (2015) indicates tourist accommodation stock available to the Wylfa Newydd construction workers is considerably below the capacity shown in the Accommodation Strategy and the required demand.	See position above. The June 2018 bedstock survey identifies both capacity in the sector and a willingness of providers to rent to workers. This reported average occupancy levels of 58%, with an August peak of 82% and a total supply of 7,187 currently lettable bedspaces at 97 operators. In addition, there are a further 16,675 privately owned bedspaces (mainly in static caravans) some of which could be made available to workers too. This is significantly lower than the level reported in the JLDP evidence base Tourism Topic Paper which reported 30,000 bedspaces in similar accommodation. Horizon's Workforce Accommodation Strategy (APP-412) assumes that workers will only occupy 450 a small percentage of these available bedspaces.	Ongoing Matter Further discussions between Welsh Government and Horizon are required in relation to the matter.
Assessment	Impact on tourism sector	WG41	Environmental Statement chapter C1 - Project wide effects - Socio-Economics (APP-088) (Application Reference Number: 6.3.1)	Welsh Government believe that further consideration should be given to the impacts of tourism on the wider North Wales region given the reliance on the A55 North Wales Expressway (particularly in the early years of construction).	The assessment of the effects of the project on tourism are considered within the Key Study Area, which includes Anglesey and parts of the Menai mainland. Impacts are not considered beyond this area as it is not anticipated that significant effects would occur.	Ongoing Matter Further discussions between Welsh Government, Isle of Anglesey County Council (IACC), and Horizon are required in relation to this matter and its relation to the s.106 agreement.

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Mitigation	Tourism Fund	WG42	Planning obligations Heads of Terms chapter 7 of Planning Statement (APP-406) Wylfa Newydd CoCP (APP-414)	Welsh Government support the provision of the Tourism Fund but seek more clarity on level and how it will be delivered and measured. Welsh Government has not been provided with information on the value of the proposed Tourism Fund. Welsh Government would also like to see clarity on the potential for wider tourism legacy.	Horizon has now shared a draft s.106 with Welsh Government for comment. This now proposes annualised payments, in recognition of the importance of tourism to Anglesey, as well as a Tourism Contingency Fund and circumstances under which this would be released, i.e. where it can be demonstrated that there is a significant adverse effect on tourism, including: • changes (material reductions) in visitor numbers to or visitor spend; • changes in the quality and availability of tourism accommodation; • a decrease in attendance numbers at tourist attractions and events; and • negative impacts on tourism businesses The Tourism Contingency Fund is intended to address any unforeseen affects, recognising that it is difficult to predict the precise effects of a Project of this scale on the tourism industry. It is proposed that the Tourism Contingency Fund is administered by the WNMPOP, following a recommendation by the Accommodation and Tourism sub-group, following the framework secured by the Wylfa Newydd CoCP (APP-414). Further detail is set out in the draft terms of reference for the WNMPOP which has been shared with Welsh Government.	Ongoing Matter Further discussions between Welsh Government, Isle of Anglesey County Council (IACC), and Horizon are required in relation to this matter and its relation to the s.106 agreement.
Mitigation	Tourism spend displacement	WG43	Planning obligations Heads of Terms chapter 7 of Planning Statement (APP-406) Wylfa Newydd CoCP (APP-414)	Welsh Government is concerned that any decrease in tourism visitor numbers will have a detrimental impact on the money spent on certain businesses and attractions within the tourism sector on Anglesey and the North Wales region, as these tourism visitors will be displaced to other regions. Therefore, any impacts on this sector will need to be carefully monitored and mitigated appropriately. For example, the need for including a contingency element for marketing for North Wales tourism attractions.	Please see above.	Ongoing Matter Further discussions between Welsh Government, Isle of Anglesey County Council (IACC), and Horizon are required in relation to this matter and its relation to the section 106 agreement. Horizon has provided (12.11.18) draft terms of reference for the WNMPOP and Sub-Groups for discussion to confirm governance process, responsibilities, and members.

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Mitigation / Monitoring	Tourism Action Plan	WG44	Planning obligations Heads of Terms chapter 7 of Planning Statement (APP-406).	Welsh Government require a commitment from Horizon in respect of implementing a Tourism Action Plan to monitor impacts and security and implementation of appropriate mitigation.	Horizon is not proposing a separate Tourism Action Plan; however the draft s.106 issued to Welsh Government includes provisions for monitoring tourism impacts and mitigating significant adverse effects where they occur.	Ongoing Matter Further discussions between Welsh Government, Isle of Anglesey County Council (IACC), and Horizon are required in relation to this matter and its relation to the section 106 agreement.
Mitigation	Monitoring	WG45	Wylfa Newydd Code of Construction Practice (APP-414)	Welsh Government considers that monitoring should be carried out for 5 years post completion of the development, as it takes on average this length of time to determine trends within the tourism sector.	Monitoring will be carried out in a proportionate manner using surveys such as a Tourism Barometer, Visitor Satisfaction Survey and Accommodation Occupancy Survey. Horizon considers that monitoring for 2 years post completion of the construction of the development would be more appropriate and proportionate. This is reflected in the draft s.106 agreement issued to Welsh Government.	Ongoing Matter Further discussions between Welsh Government, Isle of Anglesey County Council (IACC), and Horizon are required in relation to this matter and its relation to the section 106 agreement.
Mitigation / monitoring	Non-Home-Based-Workers	WG46	Workforce Accommodation Strategy (APP-412)	Welsh Government is looking for Horizon to confirm their commitment that non-home-based workers (outside the Site Campus) utilising tourist accommodation will not go over 1,100 during the construction phase as assessed in the Environmental Statement.	Horizon has made an assessment of the availability of accommodation for construction workers. This was previously based on IACC's estimate of available capacity that identified capacity in the tourism sector of 532 (other than in caravans) (as set out in the Workforce Accommodation Strategy (APP-412). IACC has further reviewed this position and this is considered further in the SoCG with IACC. Nevertheless, it is not considered appropriate for the DCO to restrict the level of accommodation provided in any sector – this is the role of the Worker Accommodation Management Service (WAMS) as described in the WAS (APP-412).	Ongoing Matter Further discussions between Welsh Government and Horizon are required in relation to this matter.

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Mitigation / monitoring	Phased approach to delivery of Site Campus	WG47	Phasing Strategy (APP-447)	Welsh Government is concerned about the current phased approach (1,000 bed spaces, 1,500 bed spaces, and 1,500 bed spaces) to the provision of temporary worker accommodation on the Site Campus and the potential impact on existing tourism stock. Welsh Government is waiting for Horizon to confirm triggers and approach to phasing of the Site Campus.	The Worker Accommodation Management Service will monitor where workers live and mitigation could be targeted, for instance, to ensure that those living the tourism sector are kept within acceptable levels. This is consistent with local policy in the Anglesey and Gwynedd Joint Local Development Plan (July 2017) which supports use of existing accommodation before building purpose-built, new accommodation, unless it would have unacceptable impacts. The phased approach to the Site Campus is to ensure that Horizon does not build additional accommodation which is not required in the event that worker numbers are lower than currently anticipated. Horizon intends to provide an updated version of this Phasing Strategy at Deadline 4 which will provide more detailed triggers for the delivery of all key mitigation, including the Site Campus. Further discussion is required on appropriate triggers. Horizon is currently reviewing whether the Site Campus can be delivered earlier than anticipated in the DCO. Any such review is being undertaken taking into account the assessed environmental and construction constraints.	Ongoing Matter Further discussions between Welsh Government and Horizon are required in relation to this matter. Horizon to provide further clarity on triggers and approach to phasing of the Site Campus
Mitigation / monitoring	Tourism Legacy	WG48	Environmental Statement chapter C1 - Project wide effects - Socio-Economics (APP-088) Wylfa Newydd Code of Construction Practice (APP-414)	Welsh Government is looking for Horizon to provide further clarity and confirmation in respect of how a legacy for training/skills/jobs in the tourism sector will be secured and implemented through the section 106 agreement.	The Wylfa Newydd Project is providing a significant, long lasting legacy for Anglesey through the provision of local employment and enhanced opportunities for local businesses, the apprenticeship scheme and support to education through commitments in the draft s.106 agreement. The increased local spending as a result of the Project will also provide long term benefits to the local communities on Anglesey. Workers living in existing tourism accommodation will also enable local providers to make use of vacancies to achieve long term benefits. Horizon is proposing a Skills Fund in the draft s.106 shared with Welsh Government. It is for the Jobs and Skills sub-group (secured in the Wylfa Newydd CoCP – APP-414) to make recommendations on how best to spend this fund, but it could be used towards training/skills in the tourism sector if considered appropriate.	Ongoing Matter Further discussions between Welsh Government, Isle of Anglesey County Council (IACC), and Horizon are required in relation to this matter and its relation to the section 106 agreement. Horizon will provide Terms of reference for Major Permissions Oversight Panel and Sub-Groups to confirm governance process, responsibilities, and members.

Matters Not Agreed

3.8.4 There are currently no aspects of Tourism which are not agreed between the Welsh Government and Horizon.

3.9 Transport and Infrastructure

Introduction

3.9.1 Welsh Government's view is that the impact of the increased volume of construction and operational traffic associated to Wylfa Newydd will cumulatively exacerbate existing congestion on the trunk road network, potentially creating new areas of congestion and generally have a negative impact on road users, including response times of the emergency services. The need to move over 1,000 Abnormal Indivisible Loads (AIL) in the first two years along the A55 North Wales Expressway (including Britannia Bridge) will cause significant disruption. Horizon do not agree with this position and consider that the Wylfa Newydd Project secures a range of effective mitigation which ensures that the traffic and transport impacts are appropriately addressed.

Matters Agreed

3.9.2 The following table sets out those aspects of the potential impacts on Transport and Infrastructure that are agreed.

Table 3.12 Transport and Infrastructure – Matters Agreed

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Method	Transport Assessment Scope	WG49	Transport Assessment (APP-101)	It is agreed that the scope of the Transport Assessment is appropriate in its scale, study area, parameters and flexibility to assess the traffic effects of the Wylfa Newydd Project.		Matter Agreed No further action required.
Method	Strategic Traffic Model (STM)	WG50	Appendix G of the Transport Assessment contained at Appendix C2-4 of the ES (APP-108)	It is agreed that the STM is an excel-based spreadsheet used to determine trips and flows across the assessed network and is an appropriate assessment tool to assess the impacts of the Wylfa Newydd Project. It is agreed that the STM follows the principles of WelTAG.		Matter Agreed No further action required.
Method	VISSIM Traffic Model Scope	WG51	Appendix I of the Transport Assessment Appendix C2-4 of the ES (APP-110)	It is agreed that the scope of the VISSIM model is appropriate in its scale, study area, parameters and flexibility to assess the traffic effects of the Wylfa Newydd Project, in particular, impacts to Britannia Bridge.		Matter Agreed No further action required.
Baseline and Data Collection	Accident Data	WG52	Appendix E of the Transport Assessment contained at Appendix C2-4 of the ES (APP-106)	The junctions which are being assessed are appropriate and adequate data has been collected to inform baseline models.		Matter Agreed No further action required.
Baseline and Data Collection	Junctions Assessment(s)	WG53	Appendix H of the Transport Assessment contained at Appendix C2-4 of the ES (APP-109)	The junctions which are being assessed are appropriate and adequate data has been collected to inform baseline models.		Matter Agreed No further action required.

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Modelling and Assumptions	Travel to work area	WG54	Gravity Model Appendix C1.2 of the ES (APP-096)	Using a gravity model for the distribution of start points for trips has been agreed. The implementation of the Gravity Model and outputs from model runs have not been agreed. The outputs from the model impact on all other transport assessment themes. The gravity model outputs are a function of its inputs. The identification of construction traffic and travel impacts and mitigation depend upon the outputs of the gravity model to provide confidence in assumptions, such as of achieving car sharing targets, confidence in the modelling analysis, which requires traffic flows, and confidence that mitigation measures such as the routes to be served by shuttle buses are appropriate. If the assumptions upon which the gravity model are found to be flawed – for example, the home-based workforce is not available to work at the site or the number of bed spaces are not available to non-home-based workers – then all the dependent assumptions will be weakened. Horizon has not provided any sensitivity analysis of the distribution of worker accommodation which means either Horizon will have to be correct in all their assumptions for the Travel Plan to work as specified or that there is sufficient tolerance in all the outcomes and mitigation measures to allow for variance from the single outcome presented.	Horizon has used an assumption that 85% of employees will live within a 90-minute travel-to-work area. This is based on experience from other Projects. It is not an area that is actively implemented by Horizon, but an assumed area from where workers are most likely to travel. It is intended that through tools such as the Employment and Skills Service (see draft s.106) and Worker Supply Chain Action Plan (see draft s.106), Horizon will be able to further maximise the number of local people working on the Project. This would tend to reduce the travel to work area and sensitivity tests using VISSIM have been prepared and shared with Welsh Government to understand the impact of more (or less) people living on the mainland (see WG63 below).	Matter Agreed / Ongoing Matter Further discussions between Welsh Government and Horizon are required in relation to this matter.
Modelling and Assumptions	Reasonably Foreseeable Future Projects	WG55	Section 5.2 and 5.3 of the Transport Assessment Appendix C2-4 of the ES (APP-101)	Welsh Government agree with the list of projects considered as part of the cumulative assessment. Please refer to queries raised under WG13 and WG14 .		Matter Agreed No further action required
Modelling and Assumptions	Merge / diverge Assessment	WG56	Appendix J of the Transport Assessment C2-4 of the ES (APP-111)	The methodology for assessing merge / diverge impacts is acceptable. The results of the analysis are predicated on outputs from the Gravity Model so cannot be agreed.	Horizon's position is provided in the Transport Assessment submitted within the DCO.	Matter Agreed / Ongoing Matter Further discussions between Welsh Government and Horizon are required in respect of the analysis.
Assessment	Impact of the Logistics Centre on Junction 2 of the A55	WG57	Appendix H of the Transport Assessment contained at Appendix C2-4 of the ES (APP-109)	Horizon to provide thresholds. Only deliveries considered by Horizon not vehicle movements.	Horizon's position is that the implementation of Parc Cybi distribution centre increases traffic flows but does not have a significant effect on the operation of the junction. Any issues with junction performance are related to background traffic growth rather than the Wylfa Newydd Project. Once the Logistics Centre has closed following the end of construction there will be no Wylfa related construction traffic travelling through Junction 2. The assessment has considered all vehicle movements, not just deliveries.	Matter Agreed No further action required

Ongoing Matters

3.9.3 The following table sets out those issues relating to Transport and Infrastructure where Welsh Government and Horizon Nuclear Power have not yet reached agreement. Principally, this relates to:

- Implementation of the ITTS;
- Further clarification regarding the method and approach to the Strategic Traffic Model, early years strategy, gravity model;
- Sensitivity analysis associated with Britannia Bridge;
- Detail regarding Abnormal Indivisible Load (AIL) movements;
- Proposed Construction Workers Strategy and Travel Plan.

Table 3.13 Transport and Infrastructure – Ongoing Matters

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Integrated Traffic and Transport Strategy (ITTS)	Implementation of Integrated Traffic and Transport Strategy (ITTS)	WG58	Chapter 6 and Appendix F of the Transport Assessment provided at Appendix C2-4 of the ES (APP-107) Wylfa Newydd CoCP (APP-414)	Welsh Government has concerns about the detailed implementation of the ITTS, in particular; the reliance on car sharing, the impact of construction vehicles on the Britannia Bridge, and the extent of road freight traffic across the network.	Horizon is confident that the proposed ITTS will result in acceptable traffic impacts on the strategic and local road network. The Wylfa Newydd CoCP (APP-414) outlines the approach taken to shuttle buses, car sharing and other mitigation measures.	Ongoing Matter Further discussions between Welsh Government and Horizon are required in relation to this matter.
Method	Assessment of workers during outage periods	WG59	Transport Assessment (APP-101)	The Welsh Government has requested further information on the assessment of 1,000 additional workers during annual outage periods and how these will be accommodated.	Details are provided in the Transport Assessment (APP-101) paragraphs 5.1.52 and Section 7.4.	Ongoing Matter Further discussions between Welsh Government and Horizon are required in relation to this matter.
Method	Britannia Bridge Sensitivity Analysis - Traffic volumes on Britannia Bridge during construction and operation of Wylfa Newydd	WG60	Section 9.5, Section 11.4 and Appendix I of the Transport Assessment provided at Appendix C2-4 of the ES (APP-110)	Welsh Government require further information on the anticipated volume of traffic using Britannia Bridge. Horizon to: a) Demonstrate the assumed number of Wylfa-related vehicles crossing Britannia Bridge in each direction per hour for each year of construction and during an outage; and b) Identify during which periods of the day traffic will be queuing on the A55/A487/A5 in the region of Britannia Bridge, and how far the queuing extends. Thresholds are to be provided regarding workers and HGV movements over Britannia Bridge, to avoid peak traffic flow periods.	The assumptions and results for items a) and b) are provided in Section 11.4 and Appendix I of the Transport Assessment (APP-110). These results show that the Wylfa Newydd Project does not have a significant impact on the operation of Britannia Bridge due to the implementation of mitigation measures such as the shuttle bus service and car sharing. Further sensitivity tests using VISSIM have been provided as part of the SoCG process and were shared with Welsh Government in September 2018. Overall, the sensitivity test analysis shows that by ensuring construction traffic does not cross the Britannia Bridge during the commuter peak hours of 08:00-09:00 and 17:00-18:00, then differing levels of mainland construction traffic do not have a significant impact on the operation of Britannia Bridge.	Ongoing Matter Further discussions between Welsh Government and Horizon are required in relation to this matter. Welsh Government to confirm position following a review of the further sensitivity analysis provided by Horizon.

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Method and assumptions	Early Years Strategy	WG61	Paragraph 5.1.45 to 5.1.51 of Transport Assessment C2-4 (APP-101) Phasing Strategy (APP-447)	Welsh Government has requested further information on the proposed strategy to deal with construction traffic prior to the operation of the Park and Ride, MOLF, Logistics Centre and Site Campus. In order to ascertain the potential impact on the strategic and local road network prior to the embedded mitigation measures being delivered.	The traffic impacts of the early years have been fully assessed in the Transport Assessment submitted as part of the DCO application. The years assessed (2020 (with and without A5025 Off-line Highway Improvements), and 2023) are described in Chapter 10 of the Transport Assessment. This document includes the number of HGVs expected per quarter of the construction programme (see Figure 7-6 of the Transport Assessment). Results for the traffic movements in the early years i.e. 2020, are provided in Chapter 11 of the Transport Assessment (Table 11-1). The Phasing Strategy (APP-447) secures the delivery of this key mitigation. Any delay to the delivery of the A5025 On-Line Highway Improvements, A5025 Off-Line Highway Improvements, MOLF, Park and Ride Facility, or Logistics Centre will not lead to increases in HGV movements above that committed to in paragraph 5.4.13 of Chapter 5 of the Wylfa Newydd CoCP (APP-414).	Ongoing Matter Further discussions between Welsh Government and Horizon are required in relation to this matter.
Method and assumptions	Holyhead Port requirement and considerations	WG62	Paragraph 12.2.4 of the Transport Assessment (APP-101) and Appendix F of the Transport Assessment contained at Appendix C2-4 of the EIA (APP-107)	Welsh Government has requested that Horizon consider the use of Holyhead Port and considers planned Stena Line upgrades as part of their Transport Assessment.	Paragraph 12.2.4 of the Transport Assessment (APP-101) provides the current position of Horizon. If facilities at the port change in the future, and the need arises from the Project for the use of more port facilities, Horizon is willing to discuss the potential use of Holyhead port in the future. Appendix A of the ITTS (APP-107) provides an analysis of rail freight options, including port requirements and considerations. The conclusions of those documents confirm that the proposed transportation modes and routes for different types of goods are appropriate.	Ongoing Matter Further discussions between Welsh Government and Horizon are required in relation to this matter.
Modelling and Assumptions	VISSIM Sensitivity Analysis - 1	WG63	Section 9.5, Section 11.4 and Appendix I of the Transport Assessment provided at Appendix C2-4 of the ES (APP-110)	Welsh Government accepts that the forecast traffic impact on the trunk road network due to Wylfa is based on a series of assumptions. However, if any of these assumptions are found to be inaccurate, the impact may be different. • Sensitivity test 1a - 25% of workers live on mainland. • Sensitivity test 1b - 25% of workers live on mainland + none travel by shuttle bus. • Sensitivity test 1c - 7.5% of workers live on mainland.	Further sensitivity tests using VISSIM have been provided as part of the SoCG process and were shared with Welsh Government in September 2018. Overall, the sensitivity test analysis shows that by ensuring construction traffic does not cross the Britannia Bridge during the commuter peak hours of 08:00-09:00 and 17:00-18:00, then differing levels of mainland construction traffic do not have a significant impact on the operation of Britannia Bridge.	Ongoing Matter Further discussions between Welsh Government and Horizon are required in relation to this matter. Welsh Government to confirm position on further sensitivity analysis provided by Horizon.

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Modelling and Assumptions	Travel Plan Sensitivity Analysis - 2	WG64	Section 9.5, Section 11.4 and Appendix I of the Transport Assessment provided at Appendix C2-4 of the ES (APP-110)	Welsh Government accepts that the forecast traffic impact on the trunk road network due to Wylfa is based on a series of assumptions. If any of these assumptions are found to be inaccurate, the impact may be different. Sensitivity test 2 - Average of 1.5 car share across the Project.	Further sensitivity tests using VISSIM have been provided as part of the SoCG process and were shared with Welsh Government in September 2018. Overall, the sensitivity test analysis shows that by ensuring construction traffic does not cross the Britannia Bridge during the commuter peak hours of 08:00-09:00 and 17:00-18:00, then differing levels of mainland construction traffic do not have a significant impact on the operation of Britannia Bridge. This analysis included double the number of workers living on the mainland and all worker trips over Britannia Bridge taking place in private cars.	Ongoing Matter Further discussions between Welsh Government and Horizon are required in relation to this matter. Welsh Government to confirm position following analysis of the further sensitivity testing provided by Horizon.
Baseline and Data Collection	Traffic Data Report	WG65	Appendix D of the Transport Assessment Appendix C2-4 of the ES (APP-105)	Horizon identified that 2023 was the peak construction period. However, it is understood that the construction timeline has slipped. WG requested confirmation that this coincides with the peak period for traffic on the Trunk Road network as the actual peak period could be different to the assessed 2023 peak construction period. For example, a summer month in a year prior to the opening of the MOLF, bypasses, logistics centre etc could be worse in terms of HGV movements especially when considering holiday traffic.	Information in the ITTS (Figure 7-2) shows that the peak year for construction vehicle movements across the Britannia Bridge is 2023. Further analysis completed since October 2017 has examined the operation of the road network near the Britannia Bridge in the summer peak period. This analysis shows that while total daily flows in the summer are higher than the assessed period (i.e. March), peak hour flows are lower. This means that the VISSIM model of the peak hours of traffic flow across the Britannia Bridge is suitable for considering impacts in March and in the summer months.	Ongoing Matter Further discussions between Welsh Government and Horizon are required in relation to this matter.
Assessment	Early Years Strategy	WG66	Transport Assessment (APP-101)	Sea-borne transportation of materials requires further investigation by Horizon for the early year's scenario	Horizon's position is that the number of construction vehicles required to access the Wylfa Newydd Development each day has been calculated assuming that the MOLF receives 60% of construction materials. This is a conservative estimate and the target is for the MOLF to receive up to 80% of bulk materials. This confirms that the assessment therefore represents a realistic worse case. This is presented in the Transport Assessment (APP-101) and supporting documents.	Ongoing Matter Further discussions between Welsh Government and Horizon are required in relation to this matter.
Assessment	Road Safety Audits	WG67	Appendix K of the Transport Assessment contained at Appendix C2-4 of the ES (APP-112)	Welsh Government has requested further information to inform their assessment.	Road Safety Audits for the Logistics Centre, Off-site Power Station Facilities, Park and Ride and the A5025 Highways Improvements (online and offline) have been undertaken and are contained in Appendix K of the submitted Transport Assessment (APP-112).	Ongoing Matter Welsh Government to confirm if this matter can now be agreed.
Assessment	Empty HGVs	WG68	Paragraph 7.6.8 of Transport Assessment C2-4 (APP-101)	Welsh Government request clarification on how empty HGVs will be marshalled on-site to ensure that there is no negative impact on the highway network.	The release of HGVs from the WND A will be managed and controlled. This is described in the submitted Transport Assessment (APP-101). Horizon is proposing a change to the Main Power Station Site sub-CoCP (APP-415) which states that construction vehicles will be held and released at regular intervals to avoid convoying, as far as practicable, from the WND A Site.	Ongoing Matter Welsh Government to confirm if this matter can now be agreed.

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Mitigation	Abnormal Indivisible Loads	WG69	Paragraph 7.6.10 to 7.6.14 of Transport Assessment Appendix C2-4 of ES (APP-101)	Welsh Government would like to see a commitment to no movement of abnormal loads on the trunk road network during peak periods.	Information on AILs is provided in the submitted Transport Assessment (APP-101). Further discussions concerning restrictions will continue as part of the SoCG process.	Ongoing Matter Further discussions between Welsh Government and Horizon are required in relation to this matter.
Mitigation	Wylfa Newydd Travel Plan for construction workers – Park and Share Sites	WG70	ITTS contained at Appendix F of the Transport Assessment (APP-107). Details also provided in paragraphs 6.3.6 to 6.3.36 of Transport Assessment Appendix C2-4 of the ES (APP-101) Section 6.3 of the Transport Assessment provided at Appendix C2-4 of the ES (APP-101).	Welsh Government has raised concerns about the over-arching principles and objectives of the Wylfa Newydd Construction Workers Strategy in terms of early years provision, car share measures, enforcement of travel plan, effectiveness of travel plan in light of churn of workforce, and ability to monitor compliance. Welsh Government considers the Travel Plan needs to be altered and enhanced, which would include a role for park and share sites to support/complement the Horizon Travel Plan and ITTS. The sites would contribute to a reduction in the number of cars arriving at Dalar Hir and the WNDA, and would result in a reduction in worker vehicles crossing the Menai Strait bridges.	Horizon is confident that its DCO application contains all of the necessary parking (onsite and at Dalar Hir) to meet the requirements of the Wylfa Newydd Project and minimise the traffic and transport impacts. However, Horizon will work with Welsh Government to consider the use of the proposed Park and Share facilities at Caernarfon and Gwynedd, on the basis that the scheme is delivered by others, as a complementary component of the transport strategy for the Wylfa Newydd Project. If the scheme is delivered, we recognise that it could potentially provide flexibility, for example as park and share facilities which could be available for workers car sharing. Welsh Government agrees that such sites would form additional, complementary and early years provision, rather than as a substitute for the parking proposed through the DCO application.	Ongoing Matter Further discussions between Welsh Government and Horizon are required in relation to this matter.
Mitigation	Code of Construction Practice	WG71	Code of Construction Practice, Code of Operational Practice (APP-414 to APP-420), Transport Assessment (APP-101).	Horizon have provided very limited information within the Code of Construction Practice (CoCP) submitted as part of the DCO in relation to the delivery of Abnormal Indivisible Loads. Welsh Government considers that as a minimum the DCO should include a requirement for the submission of an AIL Management Plan prior to development commencing that has been developed in conjunction with North Wales Trunk Road Agency, Welsh Government Transport, Gwynedd Council, Isle of Anglesey County Council, and North Wales Police.	Information on Abnormal Indivisible Loads (AILs) is provided in section 54 of the submitted CoCP (APP-414) and section 7.5 of the submitted Transport Assessment (APP-101). Access routes for HGVs, buses and abnormal indivisible loads (AILs) to the individual sites which comprise the Wylfa Newydd Project have been identified. The prioritised routing to be used is along the A55 from the mainland via Britannia Bridge to Valley and then the A5025 north. There would be some exceptions to this, for example, the north and east of Anglesey shuttle buses which would be routed via the A5025 on the eastern side of Anglesey to transport construction workers living in settlements in eastern Anglesey to and from the Wylfa Newydd Development Area and other Wylfa Newydd Project sites. It should be noted that there are relatively few AIL deliveries throughout the course of the Wylfa Newydd Project. The Transport Assessment (APP-101) states at paragraph 7.5.12 that it is expected that the peak in AIL by road activity would occur in the first two years of construction, where an average of approximately 12 AILs are expected per week. Over the course of the Project there are anticipated to be 1,150 AIL deliveries by road (paragraph 7.5.11 of the Transport Assessment - APP-101).	Ongoing Matter Further discussions between Welsh Government and Horizon are required in relation to this matter.

Matters Not Agreed

3.9.4 There are currently no aspects of Transport and Infrastructure which are not agreed between the Welsh Government and Horizon.

3.10 Digital Infrastructure

Introduction

3.10.1 Businesses and communities who live and work near to Wylfa Newydd and the associated logistics hubs are likely to suffer the effects of network congestion as a result of the degradation of mobile broadband service. These effects could have a detrimental impact on local trade, public services, as well as the social well-being of the local population. Horizon recognises that there is a risk that digital infrastructure will be affected by the Wylfa Newydd Project and has commissioned some further work to understand this further.

Matters Agreed

3.10.2 There are no matters which have been agreed at the time of drafting this version of the Statement of Common Ground.

Ongoing Matters

3.10.3 The following table sets out those issues relating to Digital Infrastructure where Welsh Government and Horizon have not yet reached agreement. Principally, this relates to:

- Methodology and specification for technical assessment of potential impact on mobile capacity and broadband capacity;
- Potential impacts on mobile capacity and broadband capacity; and
- Proposed mitigation and monitoring strategy for mobile networks and broadband networks.

Table 3.14 Digital Infrastructure – Ongoing Matters

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Digital Infrastructure	Mobile capacity	WG72	N/A	Welsh Government has raised concerns about the potential impact of Wylfa Newydd on the capacity of the mobile network on Anglesey. Without intervention, Welsh Government is concerned that businesses, citizens and the Wylfa Newydd construction workforce will experience a degraded mobile broadband experience due to additional and unplanned capacity constraints on the mobile networks. There is currently no evidence in the DCO application supporting documents that this issue has been considered in any detail.	Horizon is currently undertaking a review/assessment of broadband, digital infrastructure and mobile capacity for submission during Examination. This is likely to include: a) an initial audit of the existing digital network infrastructure associated with the Project; b) the implications of the Project on that infrastructure; c) in the event that the infrastructure needs upgrading, the potential solutions that can be implemented during the construction and operational phases of the Project.	Ongoing Matter Further discussions between Welsh Government and Horizon are required in relation to this matter. Horizon to provide the assessment of broadband, digital Infrastructure & mobile capacity to Welsh Government once it has been finalised.
Digital Infrastructure	Broadband capacity	WG73	N/A	Welsh Government has raised concerns about the potential impact of Wylfa Newydd on the capacity of the broadband on Anglesey. Without intervention, Welsh Government is concerned that businesses, citizens and the Wylfa Newydd construction workforce will experience a degraded mobile broadband experience due to additional and unplanned capacity constraints on the mobile networks. There is currently no evidence in the DCO application supporting documents that this issue has been considered in any detail.	Horizon is currently undertaking a review/assessment of broadband, digital Infrastructure & mobile capacity for submission during Examination. This is likely to include: a) an initial audit of the existing digital network infrastructure associated with the Project; b) the implications of the Project on that infrastructure; c) in the event that the infrastructure needs upgrading, the potential solutions that can be implemented during the construction and operational phases of the Project.	Ongoing Matter Further discussions between Welsh Government and Horizon are required in relation to this matter. Horizon to provide the assessment of broadband, digital Infrastructure & mobile capacity to Welsh Government once it has been finalised.

Matters Not Agreed

3.10.4 There are currently no aspects of Digital Infrastructure which are not agreed between the Welsh Government and Horizon.

3.11 Education, Skills and Labour Supply

Introduction

3.11.1 The Welsh Government considers that Wylfa Newydd will provide great opportunities to the economy and communities in North Wales, but it will also bring significant risk to the skills landscape and the local employer base. The risk of displacement of skilled and experienced individuals is significant and could destabilise what is already a fragile economy. There could be potential impacts on Anglesey, Gwynedd and Conwy, as well as the wider North Wales region and further into Wales. Horizon does not agree with this position and whilst it is agreed that there is a risk of potential displacement, it is considered that the suite of mitigation secured through the DCO and accompanying s.106 agreement ensures that these risks are minimised as far as possible and that opportunities are taken to maximise local benefits.

Matters Agreed

3.11.2 The following table sets out those aspects of the potential impacts on Education, Skills and Labour that are agreed.

Table 3.15 Education, Skills and Labour Supply – Matters Agreed

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Modelling and Assumptions	Definition of Suitably Qualified and Experienced Personnel	WG74	Environmental Statement chapter C1 - Project wide effects - Socio-Economics (APP-088), Jobs and Skills Strategy (APP-411)	The definition on Suitably Qualified and Experienced Personnel (SQEP) is agreed. Horizon definition aligns to that set by ONR - Site Licence Condition 12 which requires Horizon to “<i>make and implement adequate arrangements to ensure that only suitably qualified and experienced persons perform any duties which may affect the safety of operations on the site</i>”. For each Role within Horizon the associated Role Profile and Competency Definition details what is deemed as suitable in terms qualifications and experiences of the role holder: Level 1 – Supervised Level 2 – Unsupervised Level 3 - Advising and guiding others Level 4 – Company “expert” or “skill expert” Level 5 – Externally recognise “expert”.		Matter Agreed No further actions required.
Modelling and Assumptions	Impact of BREXIT	WG75	Environmental Statement chapter C1 - Project wide effects - Socio-Economics (APP-088), Jobs and Skills Strategy (APP-411)	The J&SS does not provide any contingency planning for the potential impacts of Brexit (or other external factors) on the workforce demographic. However, it is agreed that there is limited scope to predict the impacts of Brexit as part of considering further economic conditions within the socioeconomic assessment. However, Welsh Government will expect to see suitable contingency planning as part of an agreed mitigation strategy and monitoring programme.		Matter Agreed No further actions required.

Ongoing Matters

3.11.3 The following table sets out those issues relating to Education, Skills and Labour where Welsh Government and Horizon have not yet reached agreement. Principally, this relates to:

- Definition and profile of construction workforce;
- Commitments in relation to use of local workforce during construction phase and operational phase;
- Cumulative impacts and displacement impacts;
- Impacts and opportunities further education; and
- Mitigation and monitoring strategy.

Table 3.16 Education, Skills and Labour Supply – Ongoing Matters

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Modelling and Assumptions	Definition of 'Local' and 'Worker' Defining home-based workers and non-home-based workers.	WG76	Environmental Statement chapter C1 - Project wide effects - Socio-Economics (APP-088), Jobs and Skills Strategy (APP-411)	Welsh Government has requested further clarity on the definition of 'local', 'visitor', and 'worker'. Welsh Government has requested further clarity on the predicted number of home-based workers across the life of the construction phase and their anticipated roles on the project. Horizon to provide further clarification on definition of 'local', 'visitor', and 'worker' to be included in the DCO. Horizon to share data on predicted number of home-based workers across the life of the construction phase and their identified roles on the project.	Paragraph 1.5.118 of Chapter C1 of the Environmental Statement (APP-411) submitted with the DCO defines "local" as "already resident within the Daily Construction Commuting Zone". The DCCZ is defined in Chapter B2 of the Environmental Statement as a 90-minute commute time from the Wylfa Newydd Development Area. Horizon is carrying out some further work on the definition of 'visitor' and 'worker' and will provide a response to Welsh Government. Information on home-based worker and their identified roles will be shared through the Jobs and Skills sub-group, the role of which is explained in the Wylfa Newydd CoCP (APP-414).	Ongoing Matter Further discussions between Welsh Government and Horizon are required in relation to this matter. Horizon to share definition of worker and visitor. Horizon to share more detailed information on skills profiles home-based workers as it becomes available.

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Modelling and Assumptions	Breakdown of construction phase workforce and operational phase workforce	WG77	Environmental Statement chapter C1 - Project wide effects - Socio-Economics (APP-088), Jobs and Skills Strategy (APP-411)	Welsh Government has requested that Horizon confirm their assumptions on the breakdown of activities, skills, and roles of the construction phase workforce and operational phase workforce.	The ES Socio-Economics chapter (APP-088) Section 1 Figures C1-4 illustrates the indicative construction workforce profile and Figure C1-5 illustrates the profile showing a trade breakdown. Figure C1-7 also in Section 1 illustrates the jobs and skills engagement plan during operation. The Jobs and Skills Strategy (APP-411) section 2 illustrates the high-level outputs from the model and provides an indication of the employment profiles across various occupation groups and the workforce as a whole. It has been used in the Jobs and Skills Strategy to provide an indication of the proportions and volumes of workers, occupations and skills sets that will be required on the programme. It does not represent an estimate of how many of these will be vacant – many will be filled by existing employees of contractors in the supply chain. However, it does provide an indication of which skills will be most in demand. Section 3 sets out more detail on how these trades correlate with existing skills shortages in the construction sector. Further information of assumptions in relation to breakdown of activities, skills and roles will be shared through the Jobs and Skills sub-group, the role of which is explained in the Wylfa Newydd CoCP (APP-414).	Ongoing Matter Further discussions between Welsh Government and Horizon are required in relation to this matter.
Modelling and Assumptions	Operational Phase Employees	WG78	Environmental Statement chapter C1 - Project wide effects - Socio-Economics (APP-088), Jobs and Skills Strategy (APP-411)	Welsh Government wish to work with Horizon to increase the level of local employment during the operational phase. Horizon to confirm commitment to use reasonable endeavours to secure 90% operational workforce from local area (with definition about what local area is).	Horizon has assumed 85% of operational workforce as being local, based on what was achieved at the existing Wylfa Power Station. Horizon is happy to work with Welsh Government to increase this where possible. See WG76 for definition of “local”. It is not considered appropriate to set hard targets on the level of local employment, but this could be a KPI against which the Wylfa Newydd Employment and Skills Service (WNESS) is tested. Further details on the WNESS is provided in chapter 5 of the Jobs and Skills Strategy (APP-411).	Ongoing Matter Further discussions between Welsh Government and Horizon are required in relation to this matter.
Modelling and Assumptions	Payment terms for construction staff	WG79	Environmental Statement chapter C1 - Project wide effects - Socio-Economics (APP-088), Jobs and Skills Strategy (APP-411)	Previously, Horizon assured Welsh Government that construction workers would be paid the standard rates agreed in the National Agreement for the Engineering and Construction Industry (NAECI) and/or by the Construction Industry Joint Council (CIJC). This position has now changed. Welsh Government has requested further information in order to understand the wage profile in the context of the risk of local and regional displacement.	This is confirmed in the Job and Skills Strategy (APP-411) Section 5.3. This states it should be noted that within the construction roles, it is likely that the project will be paying the standard rates agreed in the National Agreement for the Engineering Construction Industry and/or by the Construction Industry Joint Council. As a result, there will be a wage premium only for people with higher skills not for people already in the construction industry changing jobs. The ES Socio-economic chapter (APP-088) also confirms that Information on potential wage rates for workers on the Wylfa Newydd Project is not available at present and it is likely to vary significantly across the types of roles. It is likely that they would be paid the standard rates for construction workers according to the National Joint Council for the Engineering Construction Industry or Construction Industry Joint Council. Given the role variability in these rates, data on average earnings is considered. These data show that the median wage for Anglesey residents was around £21,900 in	Ongoing matter Further discussions between Welsh Government and Horizon are required in relation to this matter.

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
					2015, and for the construction sector in Wales it was slightly higher at £24,000.	
Assessment	Cumulative Impacts	WG80	Environmental Statement chapter C1 - Project wide effects - Socio-Economics (APP-088), Inter-Project cumulative effects (APP-388).	The cumulative impacts on the displacement of the local workforce because of other large infrastructure projects across the United Kingdom has not been considered as part of the socio-economic impact assessment. The Nuclear Skills Strategy Group along with ECITB and Cogent Skills have lots of data/work on skills gaps in the nuclear sector (including skills for nuclear as well as nuclear skills).	The ES Inter-Project cumulative effects chapter (APP-388) identifies the main cumulative inter-project effects are on the labour market and local economy. It confirms no significant cumulative pressure on the local labour market has been identified. Horizon is developing a Supply Chain Action Plan to support the realisation of the goals set out in the Charter. The Action Plan is being developed jointly with the IACC, the North Wales Economic Ambition Board, and the Welsh Government and will be secured through planning obligations. Terms of references and memorandum of understanding will be developed as part of this process however it is envisaged that Horizon would establish a working group that would encourage cooperation between statutory authorities, stakeholders, project partners and third-party supply-chain providers during the construction period. The Action Plan aims to, amongst other items, monitor the impact of works outside of the development.	Ongoing Matter Further discussions between Welsh Government and Horizon are required in relation to this matter particularly in respect of the draft s.106 and developing and securing the Supply Chain Action Plan. .

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Assessment	Displacement	WG81	Environmental Statement chapter C1 - Project wide effects - Socio-Economics (APP-088)	Welsh Government is concerned that Horizon are considering displacement effects on Anglesey only and that a wider approach is required to consider displacement from wider North Wales, in particular, the established travel to work area.	Horizon's labour market assessment is the DCCZ which extends onto the mainland and therefore displacement has been considered at a wider than Anglesey level. The area which it is acknowledged is most vulnerable is Anglesey itself as it has the most remote labour market. Horizon acknowledges that some people may choose to move from other sectors to work on the Wylfa Newydd Project and intends to support backfilling of any vacancies through the Wylfa Newydd Employment and Skills Service (see Jobs and Skills Strategy (APP-411) for further details). The WNESS is secured through the draft s.106 agreement, including its role in relation to backfilling.	Ongoing matter Further discussions between Welsh Government and Horizon are required in relation to this matter. Further discussion required on Heads of Terms of Employment and Skills Service. Horizon to share draft for discussion. Agreed with IACC to have another session on strategic approach to displacement, jointly with Welsh Government.
Mitigation	Construction Phase Skills and Employees	WG82	Environmental Statement chapter C1 - Project wide effects - Socio-Economics (APP-088) Planning obligations Heads of Terms chapter 7 of Planning Statement (APP-406)	Welsh Government wish to work with Horizon to increase the level of local employment during the construction phase of the project. Horizon have been asked to acknowledge the lead-in time for training up skilled workers. There is a need for early investment and strategic planning on the skills provision ahead of FID. There is the potential for significant pump priming provided there is a suitable mechanism to secure an agreement that a proportion of the funds could come back to Welsh Government if the project does not go ahead at the FID stage. In addition, Horizon would be expected to make a funding commitment to invest in skills post-FID and how this would be secured.	It is proposed that a contribution towards construction training will be provided as part of the Skills Fund secured through the draft s.106 and that a training and skills sub-group be established to agree how the fund should be apportioned to deliver a training strategy.	Ongoing matter Further discussions between Welsh Government and Horizon are required in relation to this matter.

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Mitigation	Higher Education	WG83	Jobs and Skills Strategy (APP-411) Planning obligations Heads of Terms chapter 7 of Planning Statement (APP-406)	Welsh Government would welcome the opportunity to work with Horizon on connections with Higher Education establishments. Welsh Government wish to see this commitment as part of the Section 106 agreement.	Horizon is proposing a Jobs and Skills sub-group (as provided for in the Wylfa Newydd CoCP – APP-414) which would agree a strategy for providing construction skills training for the Wylfa Newydd Project. The terms of reference for this group, including attendance, require further development, but it is anticipated that it could include Horizon, IACC, Welsh Government and education providers. The Jobs and Skills Strategy outlines elements on how Horizon will work with a range of stakeholders including the Isle of Anglesey County Council (IACC), the Welsh Government and North Wales Economic Ambition Board members to fund and facilitate the timely delivery of additional training to meet specific skills needs identified for the Wylfa Newydd Project. The Heads of Terms for Education and Skills in the Planning Statement (APP-406) sets out the proposed DCO obligations one of which is to establish a Skills Fund to support a range of education, training and employment initiatives relating to both the construction and operational phases of the project. Further detail has now been provided in the draft s.106 agreement which has been shared with Welsh Government.	Ongoing matter Further discussions between Welsh Government and Horizon are required in relation to this matter.
Mitigation	Employment and Skills Brokerage	WG84	Environmental Statement chapter C1 - Project wide effects - Socio-Economics (APP-088)	Welsh Government support the investment into and support of the Employment and Skills Service. Welsh Government wish to see support for the service beyond the pilot term, and available to local businesses outside the WN supply chain who may be affected by labour displacement.	Horizon will establish and maintain an Employment and Skills Service throughout the lifetime of the construction project (approximately 9 years) to maximise opportunities for local people. This is secured within the draft s.106 which has been shared with Welsh Government.	Ongoing matter Further discussions between Welsh Government, Isle of Anglesey County Council (IACC), and Horizon are required in relation to the draft s.106 document.
Mitigation	Timing of Mitigation	WG85	Jobs and Skills Strategy (APP-411)	Welsh Government is waiting for further information regarding the Major Permissions Oversight Panel and Sub-Groups. Horizon will provide Terms of reference for Major Permissions Oversight Panel and Sub-Groups to confirm governance process, responsibilities, and members.	Horizon has shared draft terms of reference for the WNMPOP with Welsh Government and IACC following a meeting which the Welsh Government described in their response to Deadline 1 as “generally positive”. Horizon will work with Welsh Government to address the other comments raised in their submission to Deadline 1 on the WNMPOP.	Ongoing matter Welsh Government to confirm position in relation to timing of education and skills training. Proposed that this be one of the areas for discussion by the training and skills sub-group

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Mitigation	Skills Fund	WG86	Planning obligations Heads of Terms chapter 7 of Planning Statement (APP-406)	Welsh Government has requested further information about the Skills Fund. Welsh Government has asked Horizon to consider splitting the fund into pre-16-year-old education and post-16-year-old education.	The Heads of Terms for Education and Skills in the Planning Statement (APP-406) sets out the proposed DCO obligations one of which is to establish a Skills Fund to support a range of education, training and employment initiatives relating to both the construction and operational phases of the project. This will be a flexible Skills Fund that can support: • training capacity related to key skill requirements needed across the Wylfa Newydd Project; • development of training courses related to key skill requirements needed across the Wylfa Newydd Project; • operation of the WNESS (including outreach, work readiness training etc); • communication routes (including social media platforms) within the local community to enhance awareness of training and employment opportunities; • initiatives for upskilling of existing construction workers in the local area; and • educational activity (especially focused around STEM subjects) to promote, in particular, skills for and interest in the nuclear and construction industries. This could include capital spending to support the curriculum but excludes spending on boosting school place numbers which is covered by the Education Continency Fund. This is reflected in the draft s.106 agreement that has now been shared with Welsh Government.	Ongoing matter Further discussions between Welsh Government, Isle of Anglesey County Council (IACC), and Horizon are required in relation to this matter and its relation to the s.106 agreement, the extent of the fund, and how it will be secured / implemented.

Matters Not Agreed

3.11.4 There are currently no aspects of Education, Skills and Labour Supply which are not agreed between the Welsh Government and Horizon.

3.12 Health and Wellbeing

Introduction

3.12.1 Welsh Government’s view is that in line with the Well-being of Future Generations Act 2015, it is essential that Wylfa Newydd does not have an adverse effect on health and well-being. This includes physical, mental and social well-being of both the Wylfa Newydd workforce and the local population. There is a need to ensure that an increase in population during the construction phase does not lead to a reduction and/or deterioration in the access and quality of services for the local communities and population of North Wales. Horizon agree with the principle of ensuring that the Wylfa Newydd Project does not lead to a reduction and/or deterioration in access and quality of services for the local communities and population of North Wales, but considers that the mitigation secured through the DCO and its ongoing work with the health care authorities will ensure that this is not the case.

Matters Agreed

3.12.2 The Welsh Government agrees that the Health Impact Assessment (HIA) was prepared through a collaborative process including the Welsh Government, health authorities and other relevant stakeholders. However, there are a number of ongoing matters where Horizon and the Welsh Government has not yet reached agreement. This reflects that there are many aspects of the provision of healthcare which are subject to ongoing detailed discussion with the healthcare authorities.

Ongoing Matters

- 3.12.3 The following table sets out those issues relating to Health and Wellbeing where Welsh Government and Horizon Nuclear Power have not yet reached agreement. Principally, this relates to:
- Baseline survey and monitoring;
 - Health insurance checks for EU citizens and international workers;
 - Safeguarding vulnerable groups through the Community Safety Management Strategy;
 - Displacement of healthcare and social care service workforce;
 - On-site and off-site workforce behaviour – monitoring and enforcement of behavioural code of conduct;
 - The role of community involvement officers;
 - Off-site facilities for the Wylfa Newydd workforce;
 - Contingency planning for emergency services; and
 - Monitoring proposals for timely and effective mitigation.

Table 3.17 Health and Wellbeing – Ongoing Matters

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Baseline	Community survey	WG87	Health Impact Assessment Report (APP-429)	The Community Survey Forms a fundamental part of the baseline work. Welsh Government is concerned that the Community Survey conducted in 2015/16 reflected a much smaller Site Campus than currently proposed as part of the DCO application. Welsh Government has requested further clarification about whether the community survey will be updated to reflect a more robust baseline scenario. Welsh Government has also requested that Horizon consider how the community survey will be implemented through the monitoring programme.	The community survey was undertaken between late September and October 2016 to support the HIA and other assessments, providing an overview of the scale of people's concerns and aspirations for the Project. The survey provides evidence for the assessment of subjective issues within the Project impact assessments for example, HIA, EIA, WLIA and EqIA for which evidence sources are limited. The Site Campus will provide temporary worker accommodation and would only be present during construction of the Power Station. The survey is considered to be robust for the purposes of the above assessments and it is not considered necessary to update it.	Ongoing matter Further discussions between Welsh Government and Horizon are required in relation to this matter.

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Methodology	Assumptions on construction worker profile – estimated number of overseas workers and procedures for health insurance checks	WG88	Health Impact Assessment Report (APP-429)	Horizon have provided an indicative breakdown (by country) for the non-local international labour force. Welsh Government has requested further clarification regarding Horizon's procedures to check health insurance for international workers (noting that this may need to include EU citizens following BREXIT).	The HIA provides the estimated indicative breakdown by county for the non-international labour force in section A.3 of the HIA. Horizon would require its construction workforce to register with, and to prioritise the use of, the onsite medical and healthcare services that would be provided at the Site Campus, rather than make use of the community NHS services (secured through the Workforce Management Strategy, APP-413). Horizon, BCUHB and the wider health economy are considering the ways in which healthcare would be provided to the construction workforce. This is detailed in section C.6 of the HIA.	Ongoing matter Further discussions between Welsh Government and Horizon are required in relation to this matter.
Assessment	Safeguarding vulnerable groups	WG89	Health Impact Assessment Report (APP-429), Workforce Management Strategy (APP-413), Code of Construction Practice (APP-414)	Welsh Government considers that a more detailed assessment is required on the impact on safeguarding and health protection particularly in relation to vulnerable groups. Welsh Government is waiting to receive the Community Safety Management Strategy from Horizon.	Horizon will work with Welsh Government and other relevant partners to ensure that safeguarding matters are appropriately addressed in the Community Safety Management Strategy (CSMS). The principles of the CSMS are secured through the Wylfa Newydd CoCP (APP-414). The Workforce Management Strategy (APP-413) also sets out employer requirements in terms of safeguarding impact on vulnerable groups. The Health and Well-being sub-group (see Wylfa Newydd CoCP, APP-414) will be used as a forum for discussing/agreeing the content and terms of the CSMS.	Ongoing matter Further discussions between Welsh Government and Horizon are required in relation to this matter, once the CSMS has been shared
Assessment	Displacement	WG90	Environmental Statement chapter C1 - Project wide effects - Socio-Economics (APP-088), Health Impact Assessment Report (APP-429)	Welsh Government has raised concerns about the potential for displacement of health and social care workers from existing services because of increased competition for the workforce. This is a concern for health and social care services that require Welsh language workers. The HIA makes very little reference to these concerns. Welsh Government has requested further clarification from Horizon that support for workforce strategies includes investment in training and skills development.	Horizon acknowledges that some people may choose to move from other sectors to work on the Wylfa Newydd Project and intends to support backfilling of any vacancies through the Employment and Skills Service. Work is ongoing to develop the workforce profile. It is currently stated that the Project will provide approximately 900 posts for site services, security and clerical management. These posts may be of interest to people who currently work in the public sector especially those working in domiciliary care. The Welsh language aspect is critical to this provision of care. Horizon will provide mitigation in this respect in the form of information sharing and resources for Welsh Government, IACC and BCUHB to conduct workforce planning. This workforce planning is currently set out to delivered through the Jobs and Skills Implementation Plan secured through the draft s.106 which has been shared with Welsh Government. Labour churn in the health and social care sector is assessed in section C.9 of the HIA Report (APP-429). This includes consideration of the displacement of jobs within the care sector.	Ongoing Matter Further discussions between Welsh Government and Horizon are required in relation to this matter.

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Assessment	Anti-social behaviour: On-site and off-site	WG91	Health Impact Assessment Report (APP-429), Workforce Management Strategy (APP-413),	Welsh Government has asked for clarification about the on-site and off-site behavioural code of conduct, for example, how it will be implemented and what sanctions and measures will be enforced. Welsh Government has requested that emergencies / incidents associated with the Wylfa Newydd workforce are effectively monitored against existing baseline datasets available through the emergency services and health board. Horizon are in the process of undertaking further work on the Workforce Management Strategy (WMS) to develop the behavioural code of conduct. Horizon have agreed to consult with Welsh Government as part of this process before the end of the examination period.	Horizon would safeguard the welfare of its employees and its supply chain and, in relation to the activities of its construction workforce, the general public. This is in accordance with the Hitachi Group Code of Conduct and the Horizon Nuclear Power 'Modern Slavery Act 2015 Statement' and through the Workforce Management Strategy (WMS, APP-413). This mitigation will monitor and control the conduct of the workforce and will seek to protect the workforce and the wider community. Horizon also supports work towards community cohesion and well-being. Horizon will discuss resources with Welsh Government concerning analysis of safeguarding information. HIA Report section C.7 assesses safeguarding. Table C-8 of the HIA Report sets out additional HIA mitigation relevant to their being healthy and safe communities during construction. The HIA mitigation include an ongoing monitoring role for the Health and Well-being sub-group related to safeguarding vulnerable adults and children. This is secured via the draft s.106. Horizon are also reviewing the WMS (APP-413) in relation to sanctions and enforcement measures and is intended to submit a revised version to the examination at Deadline 4..	Ongoing matter Horizon has provided draft Terms of reference for Wylfa Newydd Major Permissions Oversight Panel and Sub-Groups to confirm governance process, responsibilities, and members. Further discussions between Welsh Government and Horizon are required in relation to this matter.
Mitigation	Wylfa Newydd workers (and their families) - Access to local NHS services outside the Site Campus	WG92	Health Impact Assessment Report (APP-429), Environmental Statement chapter B2 (APP-067), Wylfa Newydd Mitigation Route Map (APP-422), Workers Accommodation Strategy (APP-412).	Welsh Government has received confirmation that Horizon will gather aggregate anonymous data on the number of partners and dependents moving to the area with Wylfa Newydd workers to assist the BCUHB identify any additional demand for healthcare services. Welsh Government has requested further clarification on the terms of reference of the Worker Accommodation Management Service (WAMS) and how it will influence worker choices and take potential capacity thresholds into account.	The number of workers bringing families will be carefully monitored through collection of data as referred to in mitigation measure 0085 (see the Wylfa Newydd Mitigation Route Map, APP-422). Horizon will gather aggregate and anonymous data on the number of partners and dependents moving to the area with Wylfa Newydd workers. This will help BCUHB identify any additional demand for healthcare services. The Workers Accommodation Management Service (WAMS) may provide a potential mechanism for gathering this type of information. Horizon has provided draft terms of reference for the WAMS in the Worker Accommodation Strategy (APP-412). Final terms of reference are proposed to be appended to the s.106 agreement and Horizon is discussing this further with Welsh Government.	Ongoing matter Further discussions between Welsh Government and Horizon are required in relation to this matter.
Mitigation	Site Campus medical centre and facilities: On-site facilities	WG93	Draft Development Consent Order (APP-029)	A detailed specification for the proposed health care centre on the Site Campus has not been provided as part of the DCO. Welsh Government requires a commitment from Horizon and their partners that adequate provision of healthcare and emergency response facilities are made available to workers staying on the Site Campus which provide for their mental and physical well-being, and details in respect of how such commitment will be secured and implemented.	The detailed design and specification of the site campus health facility will be submitted for approval by IACC as part of draft DCO Requirement WN18. It will be prepared in consultation with the local healthcare authorities / representatives and will be operated by a suitable healthcare service provider. Horizon is engaging with BCHUB and the Welsh Ambulance Service on the provision of healthcare and emergency response facilities and will enter into a Statement of Common Ground with BCUHB on healthcare provision for the construction workforce.	Ongoing Matter Further discussions between Welsh Government and Horizon are required in relation to this matter.

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Mitigation	Community Involvement Officers	WG94	Health Impact Assessment Report (APP-429), Equality Impact Assessment (APP-434), Welsh Language Impact Assessment (APP-432 / 433)	Welsh Government has requested further information about how the Community Involvement Officers will work with the local communities, emergency services, and healthcare services.	Community Involvement Officers appointed by Horizon will be a key interface between the local community, key stakeholders and Horizon management. The CIO will be involved with implementation of HIA measures as well as relevant ES, WLIA and EqIA mitigation. Responsibilities will include the facilitation and implementation of mitigation during construction and operation. The CIO will be responsible for facilitating and co-ordinating a series of ongoing regular communication meetings with key stakeholders and local communities, to keep all stakeholders informed of issues arising throughout the operation of the Wylfa Newydd DCO Project. This will include consultation with groups representing people with protected characteristics. The role of the CIOs is set out in the Wylfa Newydd CoCP (APP-414) and secured in the draft s.106 agreement which has been shared with Welsh Government (Schedule 14).	Ongoing matter Further discussions between Welsh Government and Horizon are required in relation to this matter.
Mitigation	Off-site community health facilities	WG95	Health Impact Assessment Report (APP-429)	Welsh Government has serious concerns about how Horizon intend to work with relevant partners to deliver community health services (e.g. dentistry, pharmaceutical services) to support the off-site construction workforce (i.e. those living outside the Site Campus). Further clarification and assessment work will be required to agree appropriate demand estimates/assumptions that inform mitigation and monitoring measures.	Horizon is engaging with BCHUB on this topic and is entering into a SoCG with the Health Board on healthcare provision for the construction workforce. The draft s.106 agreement shared with Welsh Government has provisions in relation to dentistry and pharmaceutical services to support the off-site construction workforce and an interim payment to address healthcare needs of the workforce in advance of the Site Campus medical facility being provided.	Ongoing matter Further discussions between Welsh Government and Horizon are required in relation to this matter.
Mitigation	Emergency services	WG96	Health Impact Assessment Report (APP-429), Planning obligations Heads of Terms chapter 7 of Planning Statement (APP-406),	Welsh Government has requested further detail about the contingency plan for the emergency services and proposed financial contribution attributed to the contingency plan. Welsh Government is particularly concerned about increased congestion and travel times during the construction period.	An appropriate financial contribution will be provided for the emergency services, to address the impacts of the Wylfa Newydd Project. This is set out in the HIA, specifically in section C.6. This will be secured by a s.106. The draft s.106 shared with Welsh Government included provisions for the police, fire and rescue service and ambulance service. Horizon is continuing discussions with the emergency services relating to resource planning to inform the contribution in the s.106 obligation.	Ongoing matter Further discussions between Welsh Government and Horizon are required in relation to this matter. Further discussions between Welsh Government, Isle of Anglesey County Council (IACC), and Horizon are required in relation to the Section 106 document.

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Monitoring	Health and wellbeing services (including (but not limited to) impacts on the local community, safeguarding of vulnerable groups, healthcare services)	WG97	Health Impact Assessment Report (APP-429), Planning obligations Heads of Terms chapter 7 of Planning Statement (APP-406),	Welsh Government has requested continuous monitoring of impacts on healthcare services, emergency services, the local community, and vulnerable groups. Welsh Government has also requested continuous monitoring of construction workers and their dependents. At present, there is insufficient information included in the application documentation to determine how these impacts will be independently monitored and mitigated. Welsh Government will continue to work with all health and emergency services and Horizon to ensure the mitigation strategy identified as part of the HIA is implemented and monitored in a timely and effective manner, and funding is appropriately calculated and targeted.	A number of mitigation commitments have been developed through the HIA. Horizon would establish and chair an external stakeholder group (the Health and Well-being sub-group) that would include members of the health and emergency services to monitor the implementation of the HIA mitigation strategy and provide advice on its delivery. The HIA confirms that when appropriate Horizon would facilitate bespoke analysis of routinely collected public health data (existing indicators), relevant to the Project. The information would inform discussion by the Health and Well-being Sub-Group. If appropriate the Group would discuss the need for additional mitigation or follow-up investigation. This will be secured by the s.106 agreement. Horizon has shared draft terms of reference for the Wylfa Newydd Major Permissions Oversight Panel and sub-groups which it looks forward to discussing with Welsh Government.	Ongoing matter Horizon has provided draft Terms of reference for Wylfa Newydd Major Permissions Oversight Panel and Sub-Groups to confirm governance process, responsibilities, and members. Further discussions between Welsh Government, Isle of Anglesey County Council (IACC), and Horizon are required in relation to the Section 106 document.

Matters Not Agreed

3.12.4 There are currently no aspects of Health and Wellbeing which are not agreed between the Welsh Government and Horizon.

3.13 Housing and Accommodation Strategy

Introduction

3.13.1 Horizon have estimated that Wylfa Newydd will require up to 9,000 construction workers at peak. Welsh Government considers that the inadequate consideration for the accommodation of the workforce could give rise to several adverse impacts, including pressure on the local housing stock and tourist accommodation, reduced provision of affordable housing (both for first time buyers and private renters), risk of displacement within the local community (including Welsh speakers), and an increased level of commuting putting greater strain on the transport network. Horizon accept that there is a risk of this occurring, but consider that the mitigation secured through the DCO is appropriate to mitigate these effects.

Matters Agreed

3.13.2 The following table sets out those aspects of the potential impacts on Housing and Accommodation that are agreed.

Table 3.18 Housing and Accommodation Strategy – Agreed Matters

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Mitigation	Housing Fund and contingency planning	WG98	Planning obligations Heads of Terms in Planning Statement (APP-406)	Horizon is proposing a Housing Fund that would mitigate, monitor, and enhance the local housing market in North West Wales, to address the impacts of the workforce. The principle of the Housing Fund is agreed and it is proposed to be secured through the s.106 agreement. It is agreed that the fund should be flexible to ensure that it is most appropriately used to address the impact of the Wylfa Newydd Project. There are discussions ongoing as to the size and proportion of the Housing Fund in relation to both the Accommodation Capacity Enhancement Contribution and the Accommodation Contingency Fund.		Matter Agreed Further discussions between Welsh Government and Horizon are required in relation to this matter and s.106. Welsh Government is looking to work proactively with IACC and Horizon to agree the structure, content, timing, triggers, and implementation of the Housing Fund.
Mitigation	Commitment to bring empty homes back into use	WG99	Workforce Accommodation Strategy (APP-412) and Planning Obligations Heads of Terms in Planning Statement, (APP-406)	It is agreed that one of the purposes of the Accommodation Capacity Enhancement Contribution secured through the draft s.106 could be bringing empty homes back into use. This is provided for in the draft s.106 shared with Welsh Government.		Matter Agreed Further discussions between Welsh Government and Horizon are required in relation to this matter. Further discussions between Welsh Government, IACC, and Horizon are required in relation to the s.106.

Ongoing Matters

3.13.3 The following table sets out those issues relating to Housing and Accommodation where Welsh Government and Horizon Nuclear Power have not yet reached agreement. Principally, this relates to:

- Baseline information for Private Rental Sector stock, latent accommodation stock, and tourist accommodation stock;
- Distribution of construction workforce and assumed accommodation types over the life of the construction period;
- The terms of reference of the Worker Accommodation Management Service (WAMS);
- a commitment to ensuring the TWA is delivered and phased ahead of demand;
- Monitoring indicators and confirmed Terms of reference for Major Permissions Oversight Panel and Sub-Groups; and
- Appropriate contingency and s.106 arrangements if the TWA is not delivered and occupied on schedule or if there is wider evidence of emerging housing stress which exceeds that recorded in comparator Welsh authorities.

Table 3.19 Housing and Accommodation Strategy – Ongoing Matters

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Baseline	Baseline Capacity of Private Rental Sector (PRS) Stock	WG100	Environmental Statement chapter C1 - Project wide effects - Socio-Economics (APP-088)	Welsh Government do not agree with the baseline capacity figures for PRS stock which have been used to inform the housing impact assessment. There is a concern about the use of turnover and vacancy rates and national statistics, compared to a local analysis of PRS occupation, take up or condition.	Horizon's assessment is based on the best available data. We acknowledge that the data is not local and are working with IACC to reach agreement on what the capacity is. The indications from IACC data are that their numbers on capacity are not very far apart from Horizon's (for both PRS and owner occupied). There is an acknowledged issue relating to PRS capacity in the north of the island, which we are working with IACC on to address.	Ongoing Matter Further discussions between Welsh Government and Horizon are required in relation to this matter.
Baseline	Latent accommodation	WG101	Environmental Statement chapter C1 - Project wide effects - Socio-Economics (APP-088), Workforce Accommodation Strategy (APP-412)	Welsh Government has not been provided with the baseline resident surveys which inform Horizon's assumption about the number of households willing to offer latent accommodation.	The Workforce Accommodation Strategy (APP-412) section 6.3 provides detail on latent accommodation. It confirms that Horizon undertook two surveys in July and September 2015 to gauge the likely level of market response. This exercise identified a possible 400 bed spaces. IACC has also commissioned research into the sector and concluded that availability may be higher still, around 740. It is also likely that these figures will grow as the project progresses and more people are aware of the opportunity. However, this has not been included in the baseline assessment of capacity for the WMS. The commitment to encourage latent accommodation can be achieved through the Housing Fund, which is secured via the s.106.	Ongoing matter Further discussions between Welsh Government and Horizon are required in relation to this matter. Welsh Government request that the baseline resident surveys that informed Horizon's assessment are shared.
Baseline	Tourist accommodation	WG102	Workforce Accommodation Strategy (APP-412)	Evidence captured through the IACC bed stock survey (2018) and IACC JLP Tourism Topic Paper (2015) indicates tourist accommodation stock available to the Wylfa Newydd construction workers is considerably below the capacity shown in the Accommodation Strategy and the required demand.	See response to WG40 and WG41. Horizon do not agree that this shows less accommodation, but instead demonstrates that Horizon's assumptions are robust.	Ongoing matter Further discussions between Welsh Government and Horizon are required in relation to this matter.

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Modelling and Assumptions	Construction Worker Profile – Distribution and timing by accommodation type	WG103	Workforce Accommodation Strategy (APP-412)	Welsh Government would like to be more proactive to understand the construction worker profiles and how they can support the distribution and monitoring of accommodation availability. However in order to do this Welsh Government has requested further clarification about the distribution of construction workers and their associated accommodation type over the life of the construction period from Horizon.	The ES Socio-Economics chapter (APP-088) Section 1 Figures C1-4 illustrates the indicative construction workforce profile and Figure C1-5 illustrates the profile showing a trade breakdown. Figure C1-7 also in Section 1 illustrates the jobs and skills engagement plan during operation. Horizon's position is that the Gravity Model presents a best fit approach to inform assessments of the distribution of workers. The Worker Accommodation Management Service (which is secured by the s.106) would allow for monitoring of precise worker choices and for mitigation to be targeted accordingly.	Ongoing matter Further discussions between Welsh Government and Horizon are required in relation to this matter.
Modelling and assumptions	Owner Occupied Housing Stock	WG104	Environmental Statement chapter C1 - Project wide effects - Socio-Economics APP-088, Workforce Accommodation Strategy (APP-412)	Welsh Government is concerned that the owner-occupied housing stock available to Wylfa Newydd construction workers has been overstated. Welsh Government is concerned that a reduced supply of market housing and potential for house price rise could introduce displacement on residents and increased pressure on the local housing market.	IACC is planning through the Anglesey and Gwynedd Joint Local Development Plan (July 2017) for higher delivery of housing to support the increase in jobs that will arise as a result of Wylfa and other Energy Island projects. This was the approach taken in IACC's January 2017 Mitigated Scenario. In the owner-occupied sector, there must be a willing buyer and seller. It is not possible for Wylfa workers to displace existing residents from their homes unless they want to sell. Wylfa workers would be competing with existing residents who wish to buy a property and with non-residents who wish to move to the island and who, in the absence of new jobs would have to commute off the island. This is simply the normal working of the housing market for which IACC has properly planned through its JLDP.	Ongoing matter Further discussions between Welsh Government and Horizon are required in relation to this matter.
Mitigation	Workforce Accommodation Management Service (WAMS)	WG105	Workforce Accommodation Strategy (APP-412) and Planning obligations Heads of Terms in Planning Statement, (APP-406)	The Workforce Accommodation Strategy outlines a significant number of construction workers on site within the first 12 months of construction. Without appropriate mitigation being in place at that time, there is the potential for immediate pressure on the housing sector. Welsh Government has requested further clarification on the terms of reference of the Worker Accommodation Management Service (WAMS) and how it will influence worker choices and take potential capacity thresholds into account. Welsh Government also wishes to understand more about how Horizon proposes to respond if WAMS shows that workers are not occupying the various housing options along the lines envisaged in the s.106 Agreement – i.e. what is the contingency plan?	The WAMS will be operational by the time the main DCO-related construction works start, this is secured through the draft s.106 agreement. The Worker Accommodation Management Service (see draft terms of reference in the Workforce Accommodation Strategy - APP-412) will monitor where workers live and mitigation could be targeted. This is consistent with local policy in the Anglesey and Gwynedd Joint Local Development Plan (July 2017) which supports use of existing accommodation before building purpose-built, new accommodation, unless it would have unacceptable impacts. It is proposed that terms of reference for the WAMS is shared, agreed and appended to the s.106.	Ongoing matter Horizon will provide draft terms of reference for the WAMS. Further discussions between Welsh Government and Horizon are required in relation to this matter.

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Mitigation	Site Campus (Temporary Worker Accommodation)	WG106	Workforce Accommodation Strategy (APP-412), Phasing Strategy (APP-447) , Draft Development Consent Order (APP-029)	The Temporary Worker Accommodation (TWA) is the single largest component of the Workforce Accommodation Strategy. Welsh Government believe it is critical that Horizon provide a commitment to ensuring the TWA is delivered and phased ahead of demand and is in place until there is clear evidence that the TWA is no longer required. Welsh Government has requested a commitment from Horizon on the triggers and mechanisms behind each phase of the TWA. Welsh Government also requires a commitment from Horizon to achieve high occupancy rates (through marketing and incentivisation), and that this will be monitored and managed appropriately.	See response to WG47. The Phasing Strategy (APP-447) states that the Site Campus will be delivered in time for peak construction. The Phasing Strategy will be secured by draft DCO Requirement PW2 (APP-029). Horizon is investigating whether a DCO Requirement based on high levels of occupancy is practicable.	Ongoing matter Further discussions between Welsh Government and Horizon are required in relation to this matter.
Monitoring	Monitoring arrangements / indicators	WG107	Planning obligations Heads of Terms in Planning Statement, (APP-406), Code of Construction Practice (APP-414) C	Welsh Government considers that there should be continuous monitoring of workers and the developing patterns of where they choose to live is critical to ensure that appropriate mitigation is implemented and contingency funding appropriately targeted. Monitoring should go wider than WAMS (as the WAMS will not be the only mechanism to secure accommodation) and should also include monitoring key indicators of local housing stress such as house price rises, private rents, number of benefit claimants and other relevant indicators to provide a picture of the performance of the local housing market which can be assessed against comparator Welsh local authorities to gain a full picture of the potential impact of Wylfa on the local housing market. Monitoring needs to take place at local authority and settlement level to discern the impact of concentrations of housing displacement, particularly in North Anglesey but also looking more widely across the KSA and to the two partner authorities of Conwy and Gwynedd.	The WAMs CoCP and the Draft Heads of Terms, commit Horizon to monitor a number of aspects through the Housing fund. The WAMS will: • Maintain a database of suitable properties offered by landlords and providers, including Horizon's own TWA. • Provide a means for workers to search for housing that meets their needs and be put in contact with the property owners or their agents. • Capture and record data about the choices of workers, and provide reports on this data to be used for management purposes. It will also mean collecting monitoring data and reporting on it to stakeholders and using that data to help guide workers' choices and achieve better outcomes for local communities. Monitoring will also help inform and target mitigation measures	Ongoing matter Welsh Government to confirm if this matter can now be agreed. Horizon will provide Terms of reference for Major Permissions Oversight Panel and Sub-Groups to confirm governance process, responsibilities, and members. Further discussions between Welsh Government and Horizon are required in relation to this matter.
Planning Obligations	Housing Fund	WG107A	Planning obligations Heads of Terms in Planning Statement (APP-406)	Welsh Government is concerned as to what would happen if either the Site Campus is not provided and occupied on time or wider impacts of Wylfa on the local housing market in Anglesey and the adjoining local authorities are greater than anticipated. Welsh Government believes that in addition to the main s.106 fund there should be a further Contingency Fund, with appropriate monitoring arrangements, which could be accessed if there was an unplanned increase in housing stress which could be attributed to Wylfa (i.e. similar increases in housing stress were not observed in comparator Welsh authorities).	The draft s.106 includes an Accommodation (Contingency) Fund, although further discussions are required on this matter.	Ongoing matter Further discussions between Welsh Government and Horizon are required in relation to this matter.

Matters Not Agreed

3.13.4 There are currently no aspects of Housing and Accommodation Strategy which are not agreed between the Welsh Government and Horizon.

3.14 Historic Environment (CADW)

Introduction

3.14.1 The Welsh Government and Cadw have an objective to protect, conserve and promote the historic environment as a resource for the general well-being of present and future generation (paragraph 5.79, draft PPW 10). It is essential that the correct mitigation, enhancement, and compensatory measures are put forward as part of Wylfa Newydd to reduce the impact of the development on nearby heritage assets and the surrounding historic environment.

Matters Agreed

3.14.2 The following table sets out those aspects of the potential impacts on Historic Environment that are agreed.

Table 3.20 Historic Environment – Matters Agreed

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Methodology	Assessment of impact on Cestyll Garden	WG108	Environmental Statement chapter D11 - WNDA Cultural Heritage (APP-130), Environmental Statement chapter B11 Introduction to Cultural Heritage (APP-076).	The significance/value of Cestyll Garden as defined in the Environmental Statement chapter D11 - WNDA Cultural Heritage (APP-130) is agreed.		Matter Agreed No further action required.
Assessment	Impact on Kitchen Garden	WG109	Environmental Statement chapter D11 - WNDA Cultural Heritage (APP-130)	Having reviewed the evidence supplied by Horizon and the balancing act that has been applied, it is accepted that there are no reasonable alternatives to the temporary laydown area and the complete removal of the Kitchen Garden during the construction of Wylfa Newydd. It is however acknowledged that both parties are working on the detail of the enhancement measures to mitigate this loss (See WG114).		Matter Agreed No further action required.

Ongoing Matters

3.14.3 The following table sets out those issues relating to Historic Environment where Welsh Government and Horizon Nuclear Power have not yet reached agreement. Principally, this relates to:

- Impact, mitigation, and enhancement of Cestyll Garden and other historic assets located in and around Wylfa Newydd Development Area (including Conservation Management Plan);
- Impact and mitigation strategy of buried archaeology;
- Impact and mitigation strategy of Trefignath Burial Chamber;
- Historic Environment Fund; and
- Monitoring vibration impacts on heritage assets.

Table 3.21 Historic Environment – Ongoing Matters

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Methodology	Assessment of impact on Cestyll Garden – Sunlight assessment	WG110	Environmental Statement chapter D11 - WND A Cultural Heritage (APP-130), Environmental Statement chapter D10 - WND A Landscape and Visual (APP-129)	Cadw has serious concerns about the potential direct effects of overshadowing on the Cestyll Garden because of the revised design to the Power Station and supporting earthworks.	Horizon has provided further information to Welsh Government on the effects of overshadowing on Cestyll Garden. This concluded that the orientation of Cestyll Garden to the west of the nearest proposed Power Station buildings and the distance from the proposed Power Station buildings to the north-east and south limits potential changes to the amount of sunlight reaching the garden. Shade cast from adjacent proposed buildings to the east would tend to be limited to mornings. The valley garden is an enclosed garden of predominantly woodland character with some more open areas. It is therefore considered that due to the combination of the limited potential for additional shade to be cast on the garden by the Power Station buildings and the limited susceptibility of much of the garden to changes in sunlight, further sunlight assessment is not required.	Ongoing Matter Further discussions between Welsh Government and Horizon are required in relation to this matter. Welsh Government to confirm concerns in relation to overshadowing.
Assessment	Impact on Cestyll Registered Park and Garden (Kitchen Garden and Valley Garden)	WG111	Environmental Statement chapter D11 - WND A Cultural Heritage (APP-130), Marine Works sub-CoCP (APP-416)	Cadw agree that there will be a major adverse (significant) impact on the registered garden and its setting. In the consultation documents for the marine works licence, the plans include a waste water treatment works located within the essential setting and immediately adjacent to the registered park and garden boundary. The proposed water treatment works also lie within the proposed statutory boundary for the registered park and garden. It is not clear whether the impact of the proposed waste water treatment works on the setting of the registered park and garden has been assessed, including the likely impact of odour on the setting of the garden. Welsh Government is concerned that the impact of the sewerage treatment works have not been captured as part of the EIA, and there are no specific requirements to control its potential impact on the registered park and garden. .	The ES Chapter D11 (APP-130) has assessed the potential cultural heritage effects resulting from development which includes the sewage package plant located within the WND A. Chapter D1 of the ES (APP-120) states “the package sewage treatment plant would be a modularised system that would be predominately enclosed. This would prevent the emissions of odours from the main process vessels which have the potential to generate odours. Under normal circumstances, the inlet works and settlement tanks would not generate high levels of odour that could lead to annoyance at sensitive off-site locations. Appropriate operational management arrangements would be adequate to reduce the risk of odour becoming a nuisance.” These controls are secured through the Main Power Station Site CoCP (APP-415), section 7.4.	Ongoing Matter Further discussions between Welsh Government and Horizon are required in relation to this matter.

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Assessment / Mitigation	Impact on buried archaeology	WG112	Environmental Statement chapter D11 - WND A Cultural Heritage (APP-130), Planning Statement (APP-406)	Whilst the completion of an agreed excavation strategy (including completing the areas of excavation, post-excavation assessment, reporting the results and archiving) is outstanding, nationally important remains may still be subject to scheduling. In any event, NPS EN-1 states that the absence of a designation for such heritage assets does not indicate a lower significance and that the impact on the asset should be subject to the same policy considerations as those that apply to designated assets. As such the applicant would have to meet the policy test of substantial harm to the asset. Welsh Government has requested clarification about Horizons proposals to manage the remaining archaeological hotspots. Horizon have not confirmed whether further excavation works will be completed in advance of the construction period or the feasibility of preservation in-situ.	In cases where substantial harm or loss is identified to any heritage assets a full assessment with the policy tests in NPS EN-1 has been undertaken and this is presented in the Planning Statement (APP-406). The sources used to establish the cultural heritage baseline were identified in section 11.3 of ES chapter D11 (APP-130). As stated in paragraph 11.3.4 of chapter D11: While reports are not yet available, information from the results of the archaeological investigations undertaken in 2017 was used to inform the assessment of value for the following archaeological remains: • Pennant Enclosure and Cist Cemetery (Asset 205); • Tregele Romano-British Settlement (Asset 540); • Romano-British Settlement, East of Tyddyn Gele (Asset 547); • Romano-British Settlement, North-east of Tyddyn Gele (Asset 566) • Roman Settlement, North-west of Tregele (Asset 567); • Stone Trackway, North-west of Tregele (Asset 568); • Porth yr Ogof Roman Settlement (Asset 573); • Linears, Pits and Postholes, West of Porth Wylfa (Asset 575); • Roman Industrial Activity, West of Porth Wylfa (Asset 577); • Neolithic Flint Processing Site, West of Porth Wylfa (Asset 579); • Porth Wylfa Cist Cemetery (Asset 580); and • Ditch and Pits, South of Porth Wylfa (Asset 587). The archaeological discoveries that have been revealed to date following the archaeological investigations have therefore been taken into account. Further summary reports will be provided to the Examining Authority. In addition, given that the effects can be mitigated by preservation by record, and this has been accepted by Cadw and GAPS, it is not accepted that the effects on non-designated archaeological remains are commensurate with substantial harm.	Ongoing matter

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Assessment / Mitigation	Impact on heritage assets because of Associated Development	WG113	Environmental Statement chapter H11 – Logistics Centre Cultural Heritage (APP-365) Logistics Centre Design and Access Statement (APP-410)	Cadw are concerned about the impact of the Parc Cybi Logistics Hub on the setting of Trefignath Burial Chamber (Scheduled Monument). Welsh Government considers that Horizon have only considered the intervisibility of the scheduled monuments as part of their decommissioning strategy.	The ES Chapter H11 Logistics Centre – Cultural Heritage describes the assessment of potential cultural heritage effects resulting from the construction, operation and decommissioning of the Logistics Centre at Parc Cybi, including an assessment of the setting of Trefignath Burial Chamber. The Logistics Centre DAS includes Design Principles at 3.4.9 and 3.4.18 which state: <i>“Buildings (with the exception of the security kiosk and driver instruction point) and the HGV parking area will be sited to the north half of the Logistics Centre site to maintain the sight line between the Ty Mawr Standing Stone and the Trefignath Burial Chamber Scheduled Monuments.”</i> <i>“The design will minimise harm to the setting of, and retain intervisibility between the Ty Mawr Standing Stone and the Trefignath Burial Chamber Scheduled Monuments, as far as reasonably practicable within security and operational requirements.”</i>	Ongoing matter Further discussions required between Horizon and Welsh Government
Mitigation	Mitigation for Cestyll Registered Park and Garden (Kitchen Garden and Valley Garden)	WG114	Environmental Statement chapter D11 - WNDA Cultural Heritage (APP-130), and Landscape and Habitat Management Strategy (APP-424 and APP-425)	Welsh Government and Cadw have requested that Horizon make a commitment to deliver a Conservation Management Plan (CMP) for Cestyll Garden. The CMP would cover the extent of the forthcoming statutory registered area boundary for Cestyll Garden and historic assets outside of the forthcoming statutory registered area boundary but still affected by the Wylfa Newydd development, particularly the listed buildings at Felin Gafnan. The CMP would offer an opportunity to enhance other historic assets on Anglesey through offsetting measures which should be explored through the CMP. Cadw wish for the CMP to include an agreed approach to: - Enhanced public access to the valley garden - The management and introduction of interpretation boards (at appropriate locations); - Regular maintenance and restoration of the valley garden; - Landscape measures to restore/enhance former location of the kitchen garden; - An Agreed specification for; ➤ Archaeological Earthwork Survey of Cestyll House; ➤ An agreed approach to monitoring impacts of noise and vibration on all listed buildings within the registered boundary and adjacent to development site; ➤ Historic building recording, historic landscape survey, and photographic survey of Cestyll Garden; and ➤ Proposed translocations of Lady’s finger of Lancaster apple trees.	As Welsh Government is aware, Horizon does not have control over Cestyll Garden, however, it is proactively discussing the production of a CMP for the garden with the NDA. Horizon’s Statement of Common Ground with the NDA includes the following provision: “Both the NDA and Horizon agree to produce and implement a Conservation Management Plan for Cestyll Garden. This will identify specific measures to meet the aims of greater interpretation, better public access, regular maintenance and repair, and restoration to meet the overall aim of enhancement of the valley garden.” The draft s.106 issued to Welsh Government includes for a payment to be made to deliver the CMP and a commitment to use reasonable endeavours to enter into a deed of covenant to develop and deliver a CMP.	Ongoing matter Further discussions between Welsh Government, Cadw and Horizon are required in relation to this matter. In advance of the of production of a full plan, the policies of a Conservation Management Plan will be produced by Horizon for the agreement of the NDA and relevant stakeholders including Welsh Government. A draft Conservation Management Plan will be agreed with relevant stakeholders including Welsh Government.

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Mitigation and Monitoring	Historic Environment fund	WG115	Environmental Statement chapter D11 - WND A Cultural Heritage (APP-130), and Landscape and Habitat Management Strategy (APP-424 and APP-425)	Cadw have requested a commitment from Horizon regarding a proposed Historic Environment Fund that would mitigate, monitor, and enhance the historic assets on and around the Wylfa Newydd Development Area. Cadw have requested further information about: • What mitigation and enhancement measures would be provided as part of the fund; • How and who will manage the fund and over what period; and • The triggers for releasing the fund.	Horizon is not proposing a separate Historic Environment Fund, other than a payment to deliver the CMP for Cestyll Garden. The following mitigation measures are identified in the ES chapter D11 (APP-130) table D11-7: • Level 2 Historic Building recording. • Level 2 Historic Landscape survey. • Photographic survey. • Translocation of Lady's Finger of Lancaster apple trees from Cestyll Garden kitchen garden. • Horizon would work with the landowner to implement appropriate monitoring of soil pH and a visual inspection of the condition of plants during the bulk earthworks of the construction period. Horizon is proposing a contribution towards heritage and archaeology through the s.106 for Site Preparation and Clearance which includes payments for interpretation of the findings of the current excavation works. In light of these measures, a Historic Environment Fund is not considered necessary or justified.	Ongoing Matter Further discussions between Welsh Government, Cadw and Horizon are required in relation to this matter.

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Monitoring	Vibration impacts on heritage assets because of construction activities	WG116	Environmental Statement chapter D11 - WND A Cultural Heritage (APP-130), Environmental Statement Chapter D6 (APP-125) and Landscape and Habitat Management Strategy (APP-424 and APP-425)	Cadw has concerns about the potential vibration impacts to listed buildings and other heritage assets in and around the Wylfa Newydd Development Area. Horizon have not committed to restoring damaged historic buildings as part of their planning obligations.	Horizon responded to the Welsh Government on this query on 15th October 2018. Horizon's noise and vibration management is based on the controls set out in the Wylfa Newydd Code of Construction Practice (APP-414) and relevant sub-CoCPs. All blasting methods would be designed to comply with the vibration threshold values set out in section 8.2 of the Main Power Station Site sub-CoCP (APP-415). For many structures there are appropriate threshold levels proposed in guidance which are adopted within the Main Power Station Site sub-CoCP (APP-415). However, vibration thresholds for important buildings which are difficult to repair, or those thought to be structurally unsound, shall receive special consideration on a case-by-case basis. Upon any breach of the vibration threshold levels being discovered, the Wylfa Newydd Code of Construction Practice (APP-414) requires the following actions to be undertaken immediately: - review works in the area likely to be causing the breach and consider any necessary mitigation actions (including if necessary, temporary suspension of works); - confirm that monitored levels are not being impacted by other noise or vibration sources; - determine whether the exceedance is due to a particular activity or item of equipment, and if so, identify if the equipment can be substituted for an alternative piece of equipment; - implement other feasible and reasonable measures (which may include modifying time of works, using an alternate construction methodology, or a combination of these); and - continue monitoring (including additional monitoring, if required) to verify that the control measures have reduced the noise levels to acceptable level at the relevant receptors.	Ongoing Matter Further discussions between Welsh Government, Cadw and Horizon are required in relation to this matter.

Matters Not Agreed

3.14.4 There are currently no aspects of Historic Environment (CADW) which are not agreed between the Welsh Government and Horizon.

3.15 Environment

Introduction

3.15.1 Welsh Government recognise that the special and unique characteristics of the natural and built environment need to be protected for scenic, aesthetic, historic and nature conservation reasons. The Wylfa Newydd Project has the potential to cause significant effects on the air quality, flooding, watercourses, waterbodies, and waste and these are considered in the Environmental Statement submitted with the DCO, together with measures to minimise, mitigate and if necessary, compensate for those impacts. Welsh Government has a commitment to monitor, manage and reduce the impact of development on natural and built environment.

Matters Agreed

3.15.2 The following table sets out those matters relating to the natural environment that are agreed.

Table 3.22 Environment – Matters Agreed

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Role of Welsh Government and Natural Resources Wales	Role of Welsh Government and Natural Resources Wales	WG117	N/A	It is agreed that on environmental matters, Welsh Government will provide comments in relation to Welsh environmental policy. However, the Welsh Governments’ environmental advisor, Natural Resource Wales, will lead on any technical environmental issues (including matters such as Habitats Regulations Assessments).		Matter Agreed No further actions required.
Agricultural Land Classification	Loss of Best and Most Versatile Agricultural Land	WG118	Environmental Statement chapter D7 - Soils and Geology (APP-126)	The agricultural land classification (ALC) has been identified for each development site. The supporting surveys and desk assessments have been accepted by Welsh Government. The area of BMV lost has been quantified for each development site. Sensitivity, magnitude and significance of BMV loss has been assessed. Sensitivity is high for use of BMV land and the magnitude is large for the permanent loss of BMV land; the Welsh Government agrees with this interpretation. Soil types, quality, handling, storage and use has been identified. All appropriate technical guidance and policy has informed proposals. Appropriate mitigation has been considered for soils. Regarding BMV loss for permanent areas, it cannot be mitigated. Whilst a significant area of BMV (>20ha) will be lost, it is fragmented over several sites. Welsh Government considers that any alternative sites / routes would also include similar areas of BMV, potentially greater in area. Considering the above, it is agreed that the proposals are consistent with Planning Policy Wales (Edition 9) paragraph 4.10.1 with regard to BMV agricultural land.		Matter Agreed No further actions required.

Ongoing Matters

3.15.3 The following table sets out those environmental issues where Welsh Government and Horizon Nuclear Power have not yet reached agreement. Principally, this relates to:

- Management of waste as part of the Wylfa Newydd development;
- Flood risk because of Wylfa Newydd;
- Proposed wastewater treatment facilities; and
- Water supply and water stress.

Table 3.23 Environment - Ongoing Matters

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Site Waste Management	Waste management	WG119	Code of Construction Practice (APP-414) and sub-CoCP (APP-415).	Welsh Government would like clarity on the overall waste tonnages from the Temporary Worker Accommodation. Welsh Government require the developer to work with all relevant stakeholders, including NRW and Local Authorities, to ensure all phases of the development are managed in according to the waste hierarchy. Site Waste Management Plans should be produced where appropriate. Temporary and permanent accommodation should be designed to enable ease of segregation and collection of recoverable materials in accordance with the waste hierarchy. Welsh Government require the developer to obtain and comply with all relevant environmental permits in this area.	Chapter C6 of the Environmental Statement (Table C6-4) (APP-093) sets out quantities of waste produced by the Site Campus and includes a 20% contingency. The Wylfa Newydd CoCP (APP-414) and sub-CoCPs set out the implementation of waste management arrangements in accordance with the waste and materials management strategy. This includes the preparation of a report for each construction site detailed the waste management processes that were followed. The Wylfa Newydd CoCP (APP-414) also states that Horizon will apply a waste hierarchy which encourages a pro-active management of materials to reduce the amount that is discarded and seeks to recover the maximum value from the wastes that are produced with disposal as a final option.	Ongoing matter Further discussions between Welsh Government and Horizon are required in relation to this matter.
Flood risk	Flood Consequence Assessment	WG120	Environmental Statement Volume D Flood Consequence Assessment Parts 1 to 8 (APP-150-157).	The Flood Consequences Assessment (FCA) has identified a higher risk of flooding to residential properties upstream of Cemaes during construction and operation. Further mitigation will need to be identified to address the risks. Welsh Government has requested clarification on the businesses and properties impacted by flooding because of Wylfa Newydd and how the TAN15 (Flooding) tests have been considered as part of the DCO.	This issue is subject to ongoing discussions with NRW. Horizon has presented three possible options to NRW to show that there would be no increase in flow to Nant Cemaes, meeting the goal set with NRW. Options are being further developed and will be presented to the Examining Authority to demonstrate that increased flood risk can be managed and that the proposals are compliant with TAN15.	Ongoing matter Further discussions between Welsh Government and Horizon are required in relation to this matter.
Waste water	Waste water treatment for Wylfa Newydd	WG121	Environmental Statement Chapter D1 (APP-120)	Welsh Government has requested further clarification on the proposed waste water treatment for the site.	Waste water disposal and treatment during the operational stage is described in the ES Chapter D1 in sections 1.9 (APP-120). Horizon is entering into a Statement of Common Ground with Dwr Cymru Welsh Water (DCWW) which will set out progress on the solution for the waste water treatment works for the site.	Ongoing Matter Welsh Government to confirm what further information is being requested.

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Water supply and demand	Water supply to Wylfa Newydd and water stress	WG122	Environmental Statement Volume D Flood Consequence Assessment Parts 1 to 8 (APP-150-157).	Welsh Government has requested further clarification about water supply and water stress.	Water supply during the operational stage is described in the ES Chapter D1 in section 1.9. Horizon has been working closely with DCWW to agree water supply arrangements to ensure that this will not affect the local potable water supply. Confirmation of the agreed position will be set out within the DCWW Statement of Common Ground.	Ongoing Matter Welsh Government to confirm what further information is being requested.

Matters Not Agreed

3.15.4 There are currently no aspects of Environment which are not agreed between the Welsh Government and Horizon.

3.16 Planning Obligations

Introduction

3.16.1 This section outlines matters relating to planning obligations which are relevant to the Wylfa Newydd DCO application.

Matters Agreed

3.16.2 There are no matters which have been agreed at the time of drafting this version of the Statement of Common Ground.

Ongoing Matters

3.16.3 The following table sets out those aspects of the planning obligations where Welsh Government and Horizon Nuclear Power have not yet reached agreement.

Table 3.24 Planning Obligations

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Mitigation and Community Benefits	Clarification of the content of the proposed s.106 agreement including proposed mitigation and level of funding available pre-FID, security and implementation of mitigation	WG123	Planning obligations Heads of Terms chapter 7 of Planning Statement (APP-406).	Welsh Government has requested further clarification on the scope of the proposed s.106 between IACC and Horizon. Welsh Government provided comments to PINS at Deadline 1 by way of update note which set out its concerns with/comments on the draft s.106 document that was shared by Horizon on 25 th October.	Horizon provided a redacted draft s.106 for discussion to Welsh Government on 25 th October 2018 and comments were provided by Welsh Government on 10 th November 2018. Horizon will continue to engage with IACC and Welsh Government on the detail and quantum of the proposed s.106. A status note on progress with the s.106 agreement was submitted to PINS at Deadline 1. This includes an outline of the proposed engagement process with Welsh Government and IACC.	Ongoing Matter Further discussions between Welsh Government, Isle of Anglesey County Council (IACC), and Horizon are required in relation to this matter.

3.17 Draft Development Consent Order

Introduction

3.17.1 This section outlines matters relating to the Draft Development Consent Order for Wylfa Newydd. These matters were raised in a letter to Horizon Nuclear Power on 23 October 2018 and the Planning Inspectorate on 24 October 2018.

Matters Agreed

3.17.2 There are no matters which have been agreed at the time of drafting this version of the Statement of Common Ground.

Ongoing Matters

3.17.3 The following table sets out those aspects of the planning obligations where Welsh Government and Horizon Nuclear Power have not yet reached agreement.

Table 3.25 Draft Development Consent Order

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Marine Requirements	Discharging and Enforcing Authorities.	WG124	Draft Development Consent Order (APP-029)	In principle, WG agrees with the proposed approach of the applicant for NRW to be discharging authority in respect of those DCO requirements relating to the marine works so as to avoid potential conflict with the marine licence. WG's position is that Welsh Ministers should be the enforcing authority in respect of such DCO requirements. This approach is consistent with that adopted for the discharge and enforcement of conditions attached to any marine licence granted. WG agrees in principle that this should be achievable by: a) Amending section 173(2) PA2008 to include Welsh Ministers in respect of any land and sea below the mean high-water springs; and b) Amending the definition of "Discharging Authority" to refer to NRW in respect of the Requirements of the order relating to land below the MHWS and Marine Works until such time as those works have been completed. The support for the above approach is conditional on the following: a) A new article 43 being inserted as set out below for clarity (see point 2 below). b) That Welsh Ministers are named as the appeal authority in respect of all DCO requirements under Schedule 18 (see point 3 below); and c) We reserve WG's position pending further detailed discussions with NRW, the applicant and IoACC over the detailed drafting of the order	Discussions between Welsh Government, IACC, NRW and Horizon in respect of jurisdiction, enforcement and discharge of the marine requirement is ongoing and Horizon wishes to wait until the parties reach agreement on these issues before amendments are made to the draft DCO to resolve this issue.	Ongoing matter WG, Horizon, NRW and IACC to continue to discuss the proposed approach and if agreed provide amended DCO requirements / Articles in the draft DCO.

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Application of the Marine and Coastal Act 2009	Clarification that nothing in the draft DCO will obviate the need for a marine licence or in any way restrict enforcement of such licence.	WG125	Draft Development Consent Order (APP-029)	WG request the insertion of the following new Article into the draft DCO: <i>“Application of Marine and Coastal Access Act 2009 [43]. — (1) This Order is subject to the provisions of Part 4 of the 2009 Act and any licence granted pursuant to that Part and is without prejudice to the powers of the Welsh Ministers under that Part.</i> <i>(2) No provision of this Order obviates the need to obtain a marine licence under Part 4 of the 2009 Act or to comply with the conditions of any marine licence and nothing in this Order in any way limits the enforcement powers in respect of a marine licence</i> <i>(3) In the event of any inconsistency between the provisions of this Order and a marine licence, then the terms of the marine licence shall take precedence.”</i>	Some of these comments have been addressed within the updated draft DCO submitted at Deadline 1. Horizon is currently considering its position on the remaining requests and will revert to Welsh Government with its response in writing shortly.	Ongoing Matter WG and Horizon to further discuss proposed amendment.
Appeal Authority	The current drafting of Schedule 18 does not respect the devolution settlement as the person to determine appeals pursuant to DCO requirements is to be named by the Secretary of State rather than Welsh Ministers.	WG126	Draft Development Consent Order (APP-029)	Welsh Ministers should be the appeal authority or at the very least appoint the person to determine any appeal. WG therefore requests that the provisions of article 79/ Schedule 18 relating to appeals are replaced with the wording used in article 48 of the Swansea Bay DCO. The latter ensures that any appeals are in accordance with the 1990 Act, thereby respecting the devolution settlement with Welsh Ministers as appeal authority.		Ongoing Matter WG and Horizon to further discuss proposed amendment.
Deemed Approval – Schedule 18	WG has concerns over the current drafting of the deemed approach provisions.	WG127	Draft Development Consent Order (APP-029)	Whilst it is accepted that deemed approval mechanisms are commonly used in DCO's, the timescales are too short for a project of this scale. This is particularly the case as it is likely that the relevant discharging authority will wish to consult with other authorities. WG therefore request that the time periods are extended.		Ongoing Matter WG and Horizon to further discuss proposed amendment.
Statutory Nuisance (Article 10)	The Environmental Protection Act 1990 is devolved in Wales.	WG128	Draft Development Consent Order (APP-029)	WG note that the immunity granted under article 10(1)(a)(iii) goes beyond that used in other DCOs. WG is considering this in further detail, but is concerned to ensure that any DCO to be granted by the Secretary of State does not go too far in providing immunity under the Environmental Protection Act 1990. WG also currently has concerns over the high-level nature of key documents such as the CoCP which would provide immunity under article 10 based on the current drafting.		Ongoing Matter WG and Horizon to further discuss proposed amendment.

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Hedgerows (Article 75(4))	Powers under the Hedgerow Regulations 1997 are devolved to Welsh Ministers	WG129	Draft Development Consent Order (APP-029)	Whilst the applicant's desire to include as many consents as possible in the one order is noted, WG are not currently satisfied that disapplication of the requirements under these regulations by the Secretary of State is justified. The wording is not in the model provisions and there has been no prior engagement with WG on this issue.		Ongoing Matter WG and Horizon to further discuss proposed amendment.
DCO Requirements	Number of tailpieces included in requirements	WG130	Draft Development Consent Order (APP-029)	WG is concerned by the number of tailpieces included within the draft DCO requirements which have the potential to take the project beyond the parameters assessed within the ES. For example, DCO Requirement WM15 limits the number of parking spaces during construction to 1,900. This is consistent with the maximum parameter assessed in the ES and is fundamental to the assessment of impacts and mitigation required. It is not appropriate for a DCO requirement to allow for the possibility of this to be increased informally through tailpiece "unless otherwise agreed" wording. There is a statutory process should future amends be required to the DCO.		Ongoing Matter WG and Horizon to further discuss proposed amendment.
DCO Requirements reliant on inadequate application documents	Many of the DCO requirements refer to and rely upon specific documents/ schemes submitted with the application. Key mitigation is proposed to be secured this way.	WG131	Draft Development Consent Order (APP-029)	WG notes that generally the application documents relied on are currently drafted at a very high level and cannot currently be agreed as being final form documents as they either contain a lack of detail and/ or clearly enforceable obligations and trigger points. For example, the CoCP is intended to secure the Wylfa Newydd Major Permissions Oversight Panel. The purpose of the panel is to monitor impacts and manage the release of capped contingency funds under the section 106 agreement, scrutinise and approve mitigation recommended by sub-groups. However, there are a number of concerns with this approach as set out in our letter of 9 October 2018 to the applicant's solicitor. Key issues include: a) There are no clear triggers or obligations relating to establishment, conduct, terms of reference or funding for the panel. Similar concerns also arise in respect of the marine sub-code; and b) The document cannot be reviewed in isolation and depends on the contents of the section 106 agreement, which we are still yet to see (or any detailed heads of terms).		Ongoing Matter WG and Horizon to further discuss proposed amendment.

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Additional necessary DCO Requirements	The need for several additional DCO Requirements	WG132	Draft Development Consent Order (APP-029)	There is a need for several additional DCO Requirements. We reserve WG's right to raise other comments on the requirements throughout the examination. WG requests the following additional DCO requirements: Requirement that sets a maximum limit of HGV movements per day based upon that assessed in the ES. - Requirement that sets the maximum number of workers allowed on site at any one time (in accordance with the ES). The DCO should define "worker" and "visitor" for clarity and monitoring purposes. - A DCO Requirement requiring compliance with key travel plan commitments on which the ES and mitigation plan are based. The commitments in the current travel plan are not considered sufficiently precise and enforceable. The DCO requirements should either therefore require approval of a new travel plan and detail the specific obligations to be included and/ or set out key obligations which must in any event be complied with on the face of the DCO requirement. One of these key commitments should be to limit access to on-site construction car parking unless there are at least 3 "workers" per vehicle. This is consistent with the submitted Travel Plan but the wording of the requirement needs to be much more precise and enforceable. - Temporary Worker Accommodation – a DCO requirement is necessary to commit Horizon to constructing all 4,000 bed-spaces. This needs to be linked to either phases in construction programme and/ or number of workers employed, with clear enforceable triggers.		Ongoing Matter WG and Horizon to further discuss proposed amendment.

Sub Topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	Welsh Government Position	Horizon Position	Assessments / Further actions required
Minor drafting points and other comments on the draft DCO Requirements	Minor drafting points and other comments on the draft DCO Requirements	WG133	Draft Development Consent Order (APP-029)	• Definition of “Welsh Ministers” – after “Wales Act 2006”, please insert “as amended by the Wales Act 2017” • Article 22- Discharge of Water – WG’s initial view of that a new sub-para (11) should be inserted providing that the article does not authorise any groundwater or water discharge activity within the meaning of the Environmental Permitting (England and Wales) Regulations 2010. Land drainage consent is a devolved function. • WN16 – if there are 850 operational staff then why are 1,100 permanent parking spaces, plus 650 temporary spaces required? • WN18 – for clarity, the requirement should also control occupancy until health facility is actually provided not just that details have to be submitted. • Table WN20 – query the 32m height parameter of accommodation block. Understand from ES that maximum would be 7 storeys. Therefore, 7x3 metres would equal a height of 21m. • LC7 – as retaining the view is important consideration for decommissioning then WG suggest this should also be an important consideration when submitting detailed plans for layout and construction of logistics centre. • PW3 – replace “general accordance” with “accordance”. • PW2 – Requirement for phasing of the authorised development – There is a need for an additional requirement to secure the submission and approval of the Phasing Strategy referred to in PW2. Currently there is no such requirement. WG request that an additional requirement is included in the DCO to the effect that “No part of the authorised development shall be commenced until a detailed Phasing Strategy is submitted and approved. Such Phasing Strategy, must include, as a minimum the following; I, ii), iii) [reference to draft Phasing Strategy]		Ongoing Matter WG and Horizon to further discuss and if agreed provide draft additional requirements / amendments to requirements.

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