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1 Introduction

1.1 Status of this SoCG

1.1.1 ~~This Statement of Common Ground (hereafter referred to as the 'SoCG') has been developed as an iterative draft by Horizon Nuclear Power (hereafter referred to as 'Horizon') to reflect its understanding of North Wales Police's (NWP's) position expressed verbally at meetings or through correspondence and is to its knowledge an accurate reflection of agreed, disagreed and ongoing matters. At this stage however, it is not being submitted as an endorsed agreed draft with NWP. is being submitted to the Examining Authority as an agreed final version at Deadline 6, in accordance with the examination timetable.~~

Commented [BL1]: The SoCG is NOT agreed with NWP.

1.1.2 ~~It is noted that where this SoCG relies on documents which are due to be submitted at later deadlines in the examination (or submitted at Deadlines 5 and 6 and, because of the timetable, have not been fully reflected in this final draft), this is noted where relevant and may change the status of issues recorded in this version of the SoCG.~~

Commented [BL2]: NWP is not prepared to agree the SoCG until it has had the opportunity to review HNP's DL5 and DL6 documents.

1.1.1

1.1.2 ~~Horizon is continuing to work with NWP to develop the draft to a status where it can be signed and submitted as a jointly agreed statement.~~

Commented [BL3]: This should not be deleted as work is on-going.

1.1.3 ~~It will be amended as the examination progresses in order to enable a final, agreed 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' a final agreed document that has been prepared by Horizon and reviewed by NWP. 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.~~

Commented [BL4]: It is NOT an agreed document.

1.2.2 The purpose of this SoCG is to set out agreed factual information about the application for development consent made by Horizon for the construction and operation of a new nuclear power station at the Wylfa Newydd Development Area (hereafter referred to as 'WNDA') together with on and off-site associated development (hereafter referred to as 'the Wylfa Newydd DCO Project').

1.2.3 Paragraph 58 of the DCLG Guidance states:

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/>

"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"

1.2.4 The aim of this SoCG is to therefore provide a clear position of the state and extent of discussions and agreement between Horizon and NWP on matters relating to the Wylfa Newydd Project, as at 4th December 2018.

Commented [BL5]: As at Deadline 6.

1.2.5 ~~DCLG Guidance recognises and expects that SoCGs will continue to evolve during the examination period (if deemed necessary through on-going discussions between the parties). Discussions between Horizon and NWP will therefore continue to seek to extend the areas of common ground.~~

Commented [BL6]: Do not delete.

1.2.6 1.2.5 This SoCG has evolved through a series of iterative drafts. These drafts have been informed by on-going meetings between Horizon and NWP. The first draft of this SoCG was provided by Horizon in October 2017, for input and comment by NWP, and was discussed at subsequent meetings, as listed at Table 2-1 below. A revised draft (3rd draft) was issued to NWP on 17th July 2018 to which NWP provided detailed comments on 26th October 2018, prior to submission of the draft SoCG at Deadline 2. - Most recently the SoCG has been updated to reflect matters discussed between NWP and Horizon at a meeting on 24th January 2019 (at which an emerging draft of the revised s106 agreement was shared with NWP). All comments provided by NWP at that meeting were caveated to reflect the fact that HNP's Deadline 5 and Deadline 6 submissions were yet to be circulated to NWP for review.

1.2.7 As explained in Section 3 of this SoCG, NWP provided substantial comments on the 3rd draft SoCG on 26th October 2018, which also proposed significant restructuring of the SoCG from that previously being discussed. Horizon was not able to adopt these changes; however, it has reflected the NWP position in the table provided at Table 3-1.

1.2.8 ~~The document will be updated as more information becomes available and as a result of on-going discussions between Horizon and NWP.~~

Commented [BL7]: Reinstate.

1.2.9 1.2.6 Once finalised, ~~the~~This SoCG ~~is being~~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 Description of development

The Wylfa Newydd Project

1.3.1 The Wylfa Newydd Project includes:

The Enabling Works

1.3.2 The Enabling Works comprise the Site Preparation and Clearance Proposals (SPC Proposals) and the A5025 On-line Highway Improvements.

1.3.3 Horizon has submitted applications for planning permission for the Enabling Works under the Town and Country Planning Act 1990 to the Isle of Anglesey County Council (IACC) as local planning authority. The On-line Highway Improvements were granted planning permission on 13th July 2018 (ref: 27C106E/FR/ECON). The planning authority resolved to grant the SPC application subject to the signing of a legal agreement on the 5th September 2018. The position with the SPC application was summarised in the SPC Status Note submitted to the Examining Authority by Horizon at Deadline 1.

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

1.3.4

The Wylfa Newydd DCO Project

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

The Nationally Significant Infrastructure Project (NSIP)

Power Station: the proposed new nuclear power station, including two UK Advanced Boiling Water Reactors, the Cooling Water System, supporting facilities, buildings, plant and structures, radioactive waste and spent fuel storage buildings and the Grid Connection;

Other on-site development: including landscape works and planting, drainage, surface water management systems, public access works including temporary and permanent closures and diversions of public rights of way, new Power Station Access Road and internal site roads, car parking, construction compounds and temporary parking areas, laydown areas, working areas and temporary works and structures, temporary construction viewing area, diversion of utilities, perimeter and construction fencing, and electricity connections;

Marine works comprising:

- Permanent Marine Works: the Cooling Water System, the Marine Off-loading Facility, breakwater structures, shore protection works, surface water drainage outfalls, waste water effluent outfall (and associated drainage of surface water and waste water effluent to the sea), fish recovery and return system, fish deterrent system, navigation aids and Dredging;
- Temporary Marine Works: temporary cofferdams, a temporary access ramp, temporary navigation aids, temporary outfalls and a temporary barge berth;

Off-site Power Station Facilities: comprising the Alternative Emergency Control Centre (AECC), Environmental Survey Laboratory (ESL) and a Mobile Emergency Equipment Garage (MEEG); and

Associated Development

the Site Campus within the Wylfa Newydd Development Area;
temporary Park and Ride facility at Dalar Hir for construction workers (Park and Ride);

temporary Logistics Centre at Parc Cybi (Logistics Centre);
the A5025 Off-line Highway Improvements;
wetland habitat creation and enhancement works as compensation for any potential impacts
on the Tre'r Gof Site of Special Scientific Interest (SSSI) at the following sites:

- Tŷ Du;
- Cors Gwawr;
- Cae Canol-dydd

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

Licensable Marine Activities

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

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

2 Consultation with NWP

2.1.1 The preparation of this SoCG has been informed by a programme of discussions between Horizon and NWP, including the provision of comments through formal and informal consultation, and feedback provided in meetings.

Meeting schedule

2.1.2 Horizon met with NWP to discuss and document common ground on the following dates:

Table 2-1 Meetings between Horizon and NWP to discuss SoCG

Table 2-1

Meeting Date	Attendees	Purpose of Meeting
29 June 2017	Horizon / NWP	Project update
13 July 2017	Horizon / NWP	Project update
21 September 2017	Horizon / Quod / Atkins / Barton Wilmore / NWP	SoCG - update
4 October 2017	Horizon / Atkins / NWP	SoCG - update
23 October 2017	Horizon / Atkins / NWP / WAST	SoCG & EPCC Construction subgroup
13 November 2017	Horizon / Quod / Atkins / Jacobs / NWP / WAST / NWFRS	SoCG - Design meeting
13 November 2017	Horizon / Quod / Atkins / NWP	SoCG update
20 November 2017	Horizon / Quod / SDG / NWP / NWFRS / WAST	Highways meeting
19 December 2017	Horizon / Quod / Atkins / NWP	Security meeting
14 February 2018	Horizon / Atkins / NWP	Security meeting
27 February 2018	Horizon / Atkins / Quod / NWP / PHW / BCUHB / NWFRS / WAST / WG / IACC / BCA	Safeguarding
1 March 2018	Horizon / Quod / Atkins / BCA / NWP / NWFRS / WAST , BCUHB / PHW	Labour churn meeting
23 March 2018	Quod / Atkins / NWP / NWFRS	DCO application process
3 August 2018	Horizon / Quod / Atkins / NWP	SoCG Update meeting

15 November <u>2018</u>	Horizon / Quod / NWP / Barton Wilmore / Clifford Chance / WBD	SoCG / service impact report meeting
<u>23 January 2019</u>	<u>Vectos / Steer</u>	<u>T&T meeting (by teleconference)</u>
<u>24 January 2019</u>	<u>Horizon / Quod / DWD / NWP / Barton Wilmore / Clifford Chance / WBD</u>	<u>SoCG / s106 / service impact report meeting</u>

2.1.3 ~~This document will continue be updated as a result of on-going discussions between Horizon and NWP.~~

Commented [JD8]: Reinstate

Comments Provided by NWP

2.1.3 Horizon shared with NWP (amongst other statutory consultees) the draft application documents to support the DCO application that they requested, in September and October 2017, and drafts of amended documents during the examination.

2.1.4 Comments on consultation documents and draft DCO documents were provided on the following dates:

Table 2-2 Comments Provided by NWP

Date	Consultation
24 October 2016	PAC 2 consultation
22 June 2017	PAC 3 consultation
11 December 2017	Comments on draft DCO documents
13 August 2018	Relevant Representation
26 October 2018	Comments on draft SoCG
<u>28 November 2018</u>	<u>NWP Deadline 1 submission</u>
<u>7 December 2018</u>	<u>NWP Deadline 2 submission (including Written Representation)</u>
<u>19 December 2018</u>	<u>NWP Deadline 3 submission</u>
<u>22 January 2019</u>	<u>NWP Deadline 4 submission</u>

2.1.5 The comments made (prior to submission) were taken into account in the development of final documents to support the DCO. These documents also served to develop, and inform on-going discussions associated with, this SoCG. The PAC 2 and PAC3 comments formed the basis for the topics

included in the first draft of the SoCG, since when the topics have evolved in response to the progress of discussions and comments from NWP.

2.1.5

3 Current Position

3.1 Position of Horizon Nuclear Power and NWP

3.1.1 The following Table (Table 3-1) seeks to set out the position of NWP alongside Horizon's position as discussed at the meeting on 24th January 2019. Since the meeting, no further comments have been provided by NWP as HNP's Deadline 5 and Deadline 6 submissions were not available for review. At 4th December 2018, and subsequent further exchanges of the document in writing.

3.1.13.1.2 The topics for inclusion in this table were based on the consultation responses provided by NWP at PAC 2, PAC 3, the initial SoCG meetings and the draft DCO documents submitted to NWP by Horizon.

3.1.23.1.3 This SoCG was subsequently restructured to a more focused list of issues for the draft (submitted at Deadline 2) is based on an amended draft SoCG provided by NWP on 26 October 2018, although it has been modified by Horizon following a meeting with the NWP on the 15th November 2018. Whilst this seeks to retain the position expressed by NWP (as per the 26 October 2018 comments) this draft has not been formally endorsed by NWP as a jointly agreed draft.

3.1.33.1.4 It sets out matters by topic area and an indication of whether the issue is agreed (green), not agreed (red) or ongoing (amber). For expediency, the schedule focusses on those areas upon which NWP have expressed interest or concern, which can be summarised under five topic areas; these are:

- Demand on Police Services
- Traffic and Transport
- Marine Off-Loading Facility ("MOLF")
- Protest
- Workforce Implications
- Documents, policies and strategies requiring NWP input
- The draft DCO and s106 agreement.

3.1.5 Although this represents the final draft of the SoCG, in accordance with the examination timetable, points that are "ongoing" or "not agreed" will be the subject of on-going discussion wherever possible to resolve or refine the extent of disagreement between the parties throughout the DCO Examination process (albeit there will be no further opportunity to reflect this in an updated SoCG). An updated SoCG will be submitted to the Examination at a later deadline.

3.1.6 For example, a number of matters discussed relate to updates to Control Documents including the Wylfa Newydd Code of Construction Practice (CoCP) and updates to the draft DCO s.106 agreement. NWP will fully review and comment on these documents when they are submitted at

Deadlines 5 and 6. This review may allow further updates to the SoCG to be made.

3.1.4

3.1.5 ~~Horizon is continuing to work with NWP to develop the draft to a status where it can be signed and submitted as a jointly agreed statement.~~

Table 3-1 Statement of Common Ground between NWP and Horizon

Topic	Sub topic	Document Reference/ Signpost/ Routemap	SoCG ID	NWP position	Horizon position	RAG	Action required to inform further discussion on issue
Increase in demand on NWP services during construction	Potential to increase demand for NWP services	ES Volume C - Project-wide effects C1 - Socio-economics (APP-088)	NWP A.1 ³	It is agreed that the construction period of the Project has the potential to increase the demand for NWP services in a number of areas arising from the workforce population and construction activities. It is further agreed that suitable mitigation is required to ensure that the impacts of the Project do not detract from the current level and quality of services and facilities made available to NWPs existing population and communities. However, the extent of mitigation required is not agreed <i>at this stage</i> (as set out in the table below).	Agreed	No further action	
	Workforce assumptions	Workforce Accommodation Strategy (APP-412)	NWP A.2a	The DCO Application and its associated assessments are based on 9,000 construction workers being deployed in delivering the Project at the peak of activity at Q4 of 2023, with varying numbers of workers prior to and beyond this period. During peak construction, 2,000 workers are expected to be home based, leaving 7,000 non-home based. 4,000 of the non-home based workers will be accommodated in the Temporary Workers Accommodation on-site (i.e. the Site Campus) and 3,000 are expected to use bed-space accommodation across Anglesey and parts of the mainland. It is agreed that service impact will be assessed based on the expected accommodation split highlighted above.	Agreed		

³ Note that the table adopts the NWP SoCG ID numbering system

Topic	Sub topic	Document Reference/ Signpost/ Routemap	SoCG ID	NWP position	Horizon position	RAG	Action required to inform further discussion on issue
Workforce assumptions - - Monitoring (reporting)	Workforce Accommodation Strategy (APP-412) Deadline 34 Submission - Development Consent Order Section 106 Agreement Status Note (REP3-0424-010) ⁴	NWP A2b(i)		<p>Any subsequent change [to the above workforce assumptions] may require further assessment. A suitable plan, monitor and manage regime therefore needs to be established to address the implications of any further variation in these circumstances.</p> <p>The DCO is assessed on the basis of the 4,000 Site Campus, 3,000 non-home based workers, 2,000 home based workers split.</p> <p>Horizon will monitor and manage the distribution of the workforce within this split, through the Workforce Accommodation Management Service (WAMS) which will be secured by the s.106 agreement.</p> <p><u>An Emergency Services Engagement Group (ESEG) has been proposed to be constituted under the revised draft s.106 agreement (circulated on 24th January). The workforce accommodation monitoring data, collected through the WAMS, would be communicated to NWP through the ESEG.</u></p> <p><u>The Phasing Strategy secures the delivery of the Site Campus in time for peak construction.</u></p> <p><u>Horizon is currently reviewing the delivery schedule to determine whether phases can be delivered earlier. Any such review is being undertaken taking into account the assessed environmental and construction constraints.</u></p>	Agreed On going On-going		<p><u>NWP to review draft s106 and confirm if proposed ESEG composition, governance and remit are acceptable. e further action (agreed in principle, NWP to review detail of the revised s106)</u></p> <p><u>Action: NWP to confirm whether their position relates to the monitoring of the precise location of the workforce (which will be monitored through the WAMS) or if the requirement to monitor would be linked to funding (see below Horizon's position in relation to the triggers for funding).</u></p>

⁴ Note that a revised draft s106 Agreement was shared with NWP on 24th January, and will be submitted at Deadline 5.

Topic	Sub topic	Document Reference/ Signpost/ Routemap	SoCG ID	NWP position	Horizon position	RAG	Action required to inform further discussion on issue
	Workforce assumptions – Monitoring (link to Emergency Services (Police) Contribution)	Deadline 3 Submission - Development Consent Order Section 106 Agreement (REP3-042)	NWP A2b(ii)e	<u>Any subsequent change [to the above workforce assumptions] may require further assessment. A suitable plan, monitor and manage regime therefore needs to be established to address the implications of any further variation in these circumstances.</u>	<u>The use of contingency funds has been reduced across the s106 agreement and there is no intention to provide a contingency fund for the emergency services.</u> <u>Horizon have, however, drafted the agreement so that IACC would have to consult NWP on funding applications from the Community Fund which affected public safety.</u>	Not agreed	<u>No further action.</u>

Topic	Sub topic	Document Reference/ Signpost/ Routemap	SoCG ID	NWP position	Horizon position	RAG	Action required to inform further discussion on issue
	Level of impact	ES Volume C - Project-wide effects C1 - Socio-economics (APP-088)	NWP A.3	<p>NWP does not agree to this statement [<i>Horizon's position in the first paragraph in the column to the right i.e. that "based on the increase in population, Horizon's position is that the potential increase in crime rate is a negligible impact of the Project with no significant effect"</i>] and has produced a more detailed assessment explaining the impacts of the increase in population that will affect NWP. <u>This assessment has been submitted to the Examination.</u> NWP will present the mitigation that is required as soon as possible to Horizon and then also submit this into the Examination process.</p>	<p>Based on the increase in population, Horizon's position is that the potential increase in crime rate is a negligible impact of the Project with no significant effect. Horizon does however recognise that the Wylfa Newydd Project is likely to create demand on the north Wales police service. (paragraphs 1.5.63 – 1.5.68 of Chapter C1 of the ES (APP-088)).</p>	On-going/Not agreed	<p>No further action</p> <p><u>The conclusions of the Socio economic assessment are not agreed.</u></p> <p><u>The quantum of planning obligation is not agreed, though Horizon are committed to providing an appropriate level of contribution to NWP.</u></p> <p>Action: Horizon are reviewing the service impact information provided by NWP. A <u>verbal presentation of initial findings was given and arrange further meetings and was discussed on at the meeting on the 24th January 2019. Horizon to submit a formal response to the Examination at Deadline 5.</u></p> <p>NWP and Horizon will <u>continue to</u> work together in ensuring that the mitigation and associated monitoring is properly secured.</p>

Topic	Sub topic	Document Reference/ Signpost/ Routemap	SoCG ID	NWP position	Horizon position	RAG	Action required to inform further discussion on issue
Potential impacts of the project	<p><u>Deadline 2 Submission - Wylfa Newydd Code of Construction Practice (APP-031414)⁵</u></p> <p><u>Draft Development Consent Order Revision 3.0 (REP2-020APP-029)⁶</u></p> <p><u>Deadline 3 Submission - Development Consent Order Section 106 Agreement (REP3-042)⁷</u></p>	<p><u>Deadline 2 Submission - Wylfa Newydd Code of Construction Practice (APP-031414)⁵</u></p> <p><u>Draft Development Consent Order Revision 3.0 (REP2-020APP-029)⁶</u></p> <p><u>Deadline 3 Submission - Development Consent Order Section 106 Agreement (REP3-042)⁷</u></p>	NWP A.4	<p><u>NWP have identified that impacts of the Project that have the potential to increase demand for NWP services include, but are not necessarily limited to:</u></p> <ul style="list-style-type: none"> - Incidents and crime on and off site (including Temporary Workers Accommodation); requiring police attention; - Increased night-time economy; - Increased incidents and crime off-site as a result of increased population; - Cyber-crime; - Hate crime; - Increased pressures on roads policing (see B); - Safeguarding; and - Intangible future impacts. <p><u>Horizon does not necessarily disagree with this list of potential impacts, though propose that they should be agreed with NWP and established in the Community Safety Management Strategy (CSMS).</u></p> <p><u>Both parties agree that it is appropriate for Horizon and NWP to work together to agree a set of principles for the production of the CSMS which would be secured by a DCO requirement, and progressed in collaboration with an 'Emergency Services Engagement Group (ESEG)⁸. This would establish how the NWP and Horizon would work collectively in relation addressing these risks.</u></p> <p><u>The updated CSMS principles will be included within a revised Wylfa Newydd Code of Construction Practice (for submission at Deadline 5). Horizon will share the draft with NWP prior to submission. Horizon does not necessarily disagree with this list of potential impacts though wish</u></p>	<p><u>On-going</u></p> <p><u>Agreed</u></p> <p><u>On-going</u></p>	<p><u>Action: Horizon are reviewing the service impact information provided by NWP and will arrange further meetings. Agreed forward action - Horizon to issue revised CSMS principles to NWP for comment prior to submission at Deadline 5.</u></p> <p><u>Action - NWP to review Horizon Deadline 5 submissions.</u></p> <p><u>Horizon to confirm if approval of / input to other plans requested by NWP will be secured through DCO / s106.</u></p>	

⁵ Revised WN CoCP to be submitted at Deadline 5.

⁶ Revised draft DCO order to be submitted at Deadline 5.

⁷ Note that a revised draft s106 Agreement was shared with NWP on 24th January, and will be submitted at Deadline 5.

⁸ The IACC could then additionally consult NWP it its role as discharging authority for the DCO requirement

Topic	Sub topic	Document Reference/ Signpost/ Routemap	SoCG ID	NWP position	Horizon position	RAG	Action required to inform further discussion on issue
				<p>to review NWP's detailed service planning.</p> <p>Horizon has committed to working with NWP on the production of a Community Safety Management Strategy (CSMS) (See NWP F.1) which would be secured by a DCO requirement. This would address how the NWP and Horizon would work collectively in relation to some of these risks.</p>		Yellow	
	Financial contribution	<p>Deadline 3 Submission - Development Consent Order</p> <p>Section 106 Agreement (REP3-042)⁹</p> <p>Deadline 4 Submission - Development Consent Order</p> <p>Section 106 Agreement Status Note (REP1-010)</p>	NWP A.5	<p>NWP <u>have</u> <u>to</u> <u>provided</u> detailed service planning following an assessment of the impact of the Project on NWP demand, that will form the basis of the criteria under which funds will be released.</p> <p>-NWP have finalised an impact report that will inform ongoing discussions with Horizon on the matter of funding, <u>the DCO and Section 106 obligation</u>. This has been issued to Horizon (26.10.18) which was submitted at Deadline 3 (REP3-020 and REP3-062).</p>	<p>Horizon <u>have appointed</u> Gore Associates to provide a review of NWP's impact reports.</p> <p>Horizon will continue to work with NWP on appropriate mitigation, including that delivered by the draft s.106 agreement.</p>	On-going	<p><u>Agreed</u> <u>a</u><u>ction</u>:</p> <p>Horizon are reviewing the service impact information provided by NWP and arrange further meetings.</p> <p>Horizon and NWP to discuss s106 heads of terms. <u>The scale of financial contribution was discussed at a meeting between Horizon and NWP on 24 January 2019.</u></p> <p>Horizon will provide a response (reporting the findings of Gore Associates analysis) at Deadline 5.</p>

⁹ Note that a revised draft s106 Agreement was shared with NWP on 24th January, and will be submitted at Deadline 5.

Traffic and transport related impacts during construction	A5025 between Amlwch and Cemaes	ES Volume C - Road traffic-related effects (project-wide) App C2-4 - DCO Transport Assessment (APP-100) <u>NWP Deadline 4 submission (REP4-043)</u>	NWP B.1	<p>NWP does not agree with this conclusion [<i>in Horizon's position in the column to the right i.e. that the highway alignment on the A5025 between Amlwch and Cemaes does not require improvement</i>] and has produced further evidence to support its position that mitigation is required. NWP has also commissioned Vectos, a transport consultant, to review the adequacy of the transport assessment and whether this necessitates additional mitigation to be sought as a result.</p>	<p><u>Horizon are not aware of the further evidence produced by NWP.</u></p> <p>Horizon considers that its mitigation is robust and appropriate for the impacts of the Project. The highway alignment on the A5025 between Amlwch and Cemaes does not require improvement having regard to the horizontal and vertical alignment of the highway, existing traffic flows and accident data, an assessment of capacity and the consideration that it will not be a main commuter or construction vehicle route to the site. The highest increase in traffic on this route owing to the Wylfa Newydd DCO Project is +4%, therefore it is not deemed necessary or appropriate for Horizon to propose mitigation in this area.</p> <p>However, a Transport Contingency Fund is available through the draft s.106 agreement should monitoring indicate that this is an issue then funds can be drawn down if agreed by IACC.</p> <p>Horizon considers that its mitigation is robust and appropriate. The highway alignment on the A5025 between Amlwch and Cemaes does not require improvement having regard to the horizontal and</p>	On-going	
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¹⁰ This will address all outstanding T&T matters to fully reflect the discussions between Vectos and Steer on the 23rd January 2019.

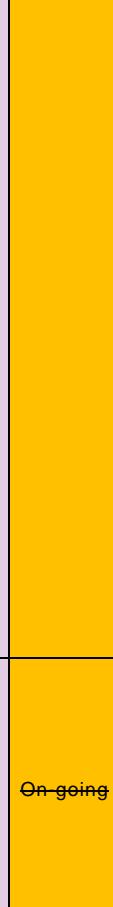
					<p>vertical alignment of the highway, existing traffic flows and accident data, an assessment of capacity and the consideration that it will not be a main commuter route to the site.</p> <p>However, a Transport Contingency Fund is available through the draft s.106 agreement should monitoring indicate that this is an issue.</p>		
Key Strategic routes	<p>ES Volume C - Road traffic-related effects (project-wide) App C2-4 - DCO Transport Assessment (APP-100)</p> <p>Phasing Strategy (APP-447)</p>	NWP B.2	<p>NWP does not agree that the embedded mitigation measures <i>[referred to in Horizon's position]</i> are necessarily sufficient to effectively manage congestion on key strategic routes. When having regard to the anticipated level of HGV and car trips to be generated at peak times during the construction period, the potential for significant effects on the A55 and Britannia Bridge, which already experience near capacity or at capacity conditions, is an area of concern for NWP. As explained in B.1, NWP has commissioned Vectos, a transport consultant, to review the adequacy of the transport assessment and whether this necessitates additional mitigation to be sought as a result.</p>	<p>The Project includes a series of embedded mitigation measures to reduce and manage road based travel, including:</p> <ul style="list-style-type: none"> - the A5025 Off-line Highways Improvements; - the Logistics Centre; - the Park and Ride; - the Site Campus at the WNDA - the MOLF <p>which are to be secured through the Phasing Strategy.</p> <p>Before the Off-Line Highway Improvement Works are completed there are restrictions to delivery timings remove the potential conflict of HGVs travelling on the A5025 and school start/finish times. Furthermore there are lower HGV caps now proposed in the early years (before the Off-Line Highway Improvement Works are completed), both of the above measures are secured in the CoCP.</p>	On-going	<p>Action: Horizon to provide a response to NWP Deadline following meeting between Steer and Vectos on 23rd January 2019.</p> <p>Action: Highways meeting between NWP / Vectos and Horizon / Steer arranged for 3/12/18</p>	

					<p><u>This embedded mitigation reduces the potential for road congestion that could affect emergency response times during construction.</u></p> <p><u>Regarding the Britannia Bridge, The Transport Assessment assessed the worst-case scenario in terms of traffic generation by assessing the peak hour traffic in the peak construction year assuming only 60% of deliveries come via the MOLF (the aim is to deliver up to 80% via the MOLF).</u> Furthermore, Appendix L of the Transport Assessment assesses the cumulative impact of the Wylfa Newydd Project along with the North Wales Connection project.</p> <p><u>In addition, sensitivity tests on the impact of traffic on the Britannia Bridge have been undertaken at the request of the Welsh Government. This information was provided to NWP in December 2018. This shows that even with a doubling of the proportion of construction workers living on the mainland, the impacts on Britannia Bridge are considered acceptable. This is owing to the fact that worker shift timings (which are controlled via the CoCP) are set to avoid travel during peak traffic times across the Britannia Bridge.</u></p> <p><u>Further changes coming in the next version of the CoCP include:</u></p> <ul style="list-style-type: none">• Mode share targets for	
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					<p><u>worker travel for each year of the construction programme in-line with assumptions made in the ES – these have already been shared with NWP.</u></p> <ul style="list-style-type: none"><u>More detail on how construction traffic will be managed, including AILs</u><u>More detail on how traffic impacts will be monitored</u><u>More detail on enforcement</u> <p><u>This will further control the traffic impacts of the Project.</u></p> <p><u>The conclusions of the Transport Assessment are that there is currently no additional mitigation proposed in addition to the embedded mitigation. The Project includes a series of embedded mitigation measures to address potential congestion, including:</u></p> <ul style="list-style-type: none"><u>the A5025 Off-line Highways Improvements;</u><u>the Logistics Centre;</u><u>the Park and Ride;</u><u>the Site Campus at the WNDA</u><u>the MOLF</u> <p><u>which are to be secured through the Phasing Strategy.</u></p> <p><u>Before the off-line highways are completed there are restrictions to deconflict HGVs from school times/busy periods.</u></p> <p><u>This embedded mitigation reduces the potential for road congestion</u></p>	
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					that could affect emergency response times during construction. The conclusions of the Transport Assessment are that there is currently no additional mitigation proposed in addition to the embedded mitigation.		
-Construction traffic management	<p>Wylfa Newydd Code of Construction Practice (REP2-031APP-414)¹¹</p> <p>Workforce Management Strategy (APP-4134)</p> <p>Main Power Station Site sub CoCP (REP2-032APP-415)</p> <p>Marine Works sub-CoCP (REP2-033 APP-416)</p> <p>Off-Site Power Station Facilities sub-CoCP (REP2-034APP-417)</p>	NWP B.3	<p>NWP does not agree that the plans [referred to in the first paragraph of Horizon's position in the column to the right] in their current form <u>as drafted at Deadline 2</u> are sufficient and fit for purpose.</p> <p><u>NWP position is set out in detail in the Deadline 4 Submission (REP4-043).</u></p> <p><u>NWP note the changes made to various documents and will review and respond at Deadlines 5 and 6.</u></p>	<p>The measures set out, or to be set out, in the Code of Construction Practice (CoCP), Workforce Management Strategy (WMS) and Wylfa Code of Conduct will assist in mitigating the impact of traffic generated by the Project in relation to the matters of traffic management planning, incident management, accident analysis, fly parking, driver behaviour, road traffic accidents and abnormal loads.</p> <p><u>In addition, the s.106 agreement funds IACC to undertake traffic monitoring and promote a road safety campaign.</u></p> <p>Horizon note that a number of DCO documents have been updated and <u>have/will be submitted at Deadlines 5 and 6</u>, including:</p> <ul style="list-style-type: none"> • <u>Wylfa Newydd Code of Construction Practice</u> • <u>Workforce Management Strategy(APP-414)</u> • <u>Main Power Station Site</u> 	On-going	<p>Agreed aAction:</p> <p>NWP to review position following submission and review of modified documents <u>and through further dialogue with Horizon in light of matters discussed on 24 January 2019 meeting.. To be submitted by Horizon at Deadlines 5 and 6.</u></p>	

¹¹ Note that all document references in this cell will be superseded by Document 5 and 6 submissions

		<p>Park and Ride sub-CoCP (REP2-035APP-418)</p> <p>Logistics Centre sub-CoCP (APP-419)</p> <p>A5025 Off-line Highway Improvements sub-CoCP (REP2-036APP-420)</p>		<ul style="list-style-type: none"> sub CoCP (APP-415) Marine Works sub-CoCP (APP-416) Off-Site Power Station Facilities sub-CoCP (APP-417) Park and Ride sub-CoCP (APP-418) Logistics Centre sub-CoCP (APP-419) A5025 Off-line Highway Improvements sub-CoCP <u>Code of Operational Practice</u> (APP-420) <p><u>The changes were discussed with NWP at the meeting on 24 January 2019.</u></p> <p>Further updates will be made by Horizon throughout the examination process.</p> <p>In addition, the s.106 agreement funds IACC to undertake traffic monitoring and promote a road safety campaign.</p>		
Impact on RPU	<p>ES Volume C - Read traffic-related effects (project wide)</p> <p>App C2-4 - DCO Transport Assessment (APP-100)</p>	NWP B.4	<p>The traffic and population generated by the Project will place significantly greater pressure on the resources of NWP's Roads Policing Unit (RPU). In order for NWP's RPU to continue to effectively police the road networks and communities of North Wales, mitigation will be required to resource the related front line and support services.</p>	<p>Horizon note NWP's position and that the detailed impact report provides specific analysis from the RPU.</p>		<p>Action: Horizon are reviewing the service impact information provided by NWP and will arrange further meetings.</p> <p><u>No action (agreed that this line duplicates A.5)</u></p>

MOLF (construction and operation)	Waterborne response	<u>Wylfa Newydd Code of Construction Practice (REP2-031)</u> <u>Marine Works sub- CoCP (REP2-033)</u> <u>Wylfa Newydd Code of Construction Practice (APP-414)</u>	NWP C.1	<p>NWP does not currently have the capability for waterborne response and the establishment of such capabilities would require significant resources and planning. The DCO Application does not contain sufficient information to enable NWP to understand how the MOLF will operate, particularly in relation to security.</p> <p><u>NWP acknowledge, however, that a fully detailed plan for the operation and security of the MOLF will not be progressed further by Horizon at this stage. The operation of the MOLF will be subject to a full Port Management Safety Plan (outside the control of the DCO regime)</u></p> <p><u>Horizon will provide NWP with sufficient information, at the appropriate time, in order to undertake an assessment of the potential impact of the construction and operation of the MOLF on the efficient running of their services.</u></p> <p><u>Horizon are to undertake a review of potential security measures that could be implemented at the MOLF and will provide NWP with sufficient information in order to undertake an assessment of the potential impact of the construction and operation of the MOLF on the efficient running of their services.</u></p>	On-going Agreed On-going	<p>Further discussions required between NWP and Horizon. No further action (at this stage) Horizon has not provided details of the Port Management Plan to NWP and no mechanism has been proposed to deal with any uplift in planning obligations that may result from the future assessment of the impact of the MOLF on NWP's operation.</p>
Protest during construction and operation	Site security	Design and Access Statement - Volume 3 - Associated Developments and Off-Site Power Station Facilities (Part 1 of 2)	NWP D.1	<p>It is agreed that Horizon has a statutory duty to prevent unauthorised access to the Project and will complete site-specific assessments of the security and trespass risk at each site and implement appropriate control measures. The site boundary will be secured and constructed such that it minimises opportunities for unauthorised entry and criminal offences by protestors.</p> <p>Horizon will conduct regular security patrols of the site boundary on a 24 hours basis and this is secured by the Wylfa Newydd CoCP (APP-421).</p>	Agreed	No further action

		(REP2-029APP-409) Wylfa Newydd Code of Construction Practice (REP2-031)Wylfa Newydd CoCP (APP-421)				
	Waterborne protest	Wylfa Newydd Code of Construction Practice (REP2-031) Wylfa Newydd Code of Construction Practice (APP-414) Draft Development Consent Order (APP-029)	NWP D.2	<p>It is agreed that the Project attracts a risk of waterborne protest and Horizon will review potential security measures that could be implemented at the MOLF that will help to address this risk and seek to agree with NWP through <u>a future Protest Management Strategy secured by the CoCP (having regard to the Port Management Safety Plan delivered outside the DCO regime)</u>, the Community Safety Management Strategy (CSMS)</p>	Agreed On-going	<p>Horizon has not provided details of its Protest Management Strategy to NWP and no contingency mechanism has been proposed to deal with any uplift in planning obligations that may result from protest. No further action (at this stage) Action: Further specific discussions regarding Horizon's protest strategy.</p>
	Protest management	Wylfa Newydd Code of Construction Practice (REP2-031) Wylfa	NWP D.3	<p>The Project could attract protest activity from both local and International groups prior to and during the construction phase. In such instances, facilitating the right to peaceful protest, keeping roads and highways open, protecting the public and workers and preventing related crimes occurring are all the responsibility of NWP.</p> <p>Horizon recognises that there is potential for incidents that require a response and intends to develop and implement a protest management</p>	On-going Agreed On-going	<p>Action: Horizon to provide Agreed Further dialogue between NWP and Horizon to agree responsibilities in managing</p>

		<u>Newydd CoCP (APP- 414)</u>	<p>strategy in consultation with NWP and other relevant stakeholders. This could involve the appointment of private expertise employed by Horizon.</p> <p>A Protest Management Strategy is currently required by the CoCP and as currently drafted requires NWP to be consulted on its preparation. NWP require the ability to agree the principles of the Protest Management Strategy, rather than just be 'consulted' on its content.</p> <p><u>It was agreed at the meeting on 24th January that a form of words would be proposed which provided NWP with the ability to agree the principles of the Protest Management Strategy (beyond consultation) but without full 'sign off' powers or the ability to veto the future strategy.</u></p> <p>Horizon recognises that there is potential for incidents that require a response and intends to develop and implement a protest management strategy in consultation with NWP and other relevant stakeholders. This could involve the appointment of private expertise employed by Horizon.</p> <p><u>This is secured by the Wylfa Newydd CoCP (APP-414).</u></p>		<u>protest subject to agreeing mutually agreeable wording for NWP agreement for inclusion in the CoCP / s106 (see F.1).</u>
Impact on NWP resourcing	<u>Deadline 3 Submission - Development Consent Order Section 106 Agreement (REP3- 042)¹²ES Volume C Project-wide effects C1- Socio- economics (APP-088)</u>	NWP D.4	<p>The experience from other nationally significant energy and infrastructure projects has shown that should protests occur and become protracted the resulting impact on both the local police and border forces can be extremely detrimental to resourcing and finance. Continued protest will have a materially detrimental impact on local communities. A mechanism for resourcing the recruitment and retention of additional specialist skilled</p>	<p>Horizon will consider the matter of resourcing as part of the review of NWP impact reports.</p>	<p>On-going</p> <p>Action: <u>Further dialogue between NWP and Horizon to agree responsibilities in managing protest. As per A.5.</u></p>

¹² Note that a revised draft s106 Agreement was shared with NWP on 24th January, and will be submitted at Deadline 5.

				officers therefore needs to be agreed between Horizon and NWP.			
Workforce implications during construction	Crime rates	ES Volume C - Project-wide effects C1 - Socio-economics (APP-088)	NWP E.1	The temporary increase in the population on the island of Anglesey and on the mainland, as a consequence of the Project, has the potential to correlate with an increase in crime rates and other instances that place a demand on NWP services. The extent to which NWP services will be affected as a result of the population increase is the subject of a detailed assessment, which has been submitted to Horizon. The extent of this impact on demand is not agreed.	<p><u>As per A.3 Horizon consider that the findings of the ES are robust, i.e. that based on the increase in population, Horizon's position is that the potential increase in crime rate is a negligible impact – though that the Wylfa Newydd Project is likely to create demand on the north Wales police service. The extent of the impact is not agreed and subject to the actions set out at A.5.</u></p> <p><u>Horizon will consider the potential impact on increase in crime rates and demands on NWP services resourcing as part of the review of NWP impact reports.</u></p>	On-going	<p>Action: Horizon are reviewing the service impact information provided by NWP and arrange further meetings. As per A.5.</p>
	Workforce behaviour		NWP E2a	It is agreed that certain mitigation measures proposed by Horizon, relating to worker behaviour, provide the opportunity to decrease the potential for crime to occur and help to manage the impact of the Project on local communities.	Agreed	No further action	
	Code of conduct	Workforce Management Strategy (APP-413) ¹³	NWP E2b	<u>The CoC will be in accordance with the principles set out in the WMS, it is essential that NWP, alongside other agencies, is involved in the preparation of the Wylfa Code of Conduct that stems from the WMS and that a monitoring group is established in accordance with an agreed timeframe to ensure effective monitoring and on-going</u>	On-going Agreed On-going	<u>Action: Agreed subject Horizon to provide forward action to agree the principles set for inclusion out in the</u>	

¹³ Revised WMS to be submitted at Deadline 5.

			<p><u>mitigation:</u></p> <p><u>These principles in the WMS are being updated by Horizon and will be shared with NWP prior to submission at Deadline 5.</u></p> <p><u>Horizon are also proposing an associated revised requirement (PW8) requiring compliance more clearly with the WMS, reflecting more clearly the WMS/COC relationship. See Horizon's position below at NWP F.4</u></p>		<p><u>WMS. Action: NWP to provide schedule explaining which documents NWP want approval rights over and those which want to be involved in.</u></p>
Documents, policies and strategies requiring NWP input	See list at Annex 2 of NWP Deadline 4 submission (REP4-043) Wylfa Newydd Code of Construction Practice (APP 414) Wylfa Newydd Code of Operational Practice (APP 421) Sub-COCPs (APP 415-APP419) Workforce Management Strategy (APP 413)	NWP F.1	<p>NWP's <u>position on the level of involvement in the preparation, monitoring and review of the following documents, policies and strategies will be necessary and should be subject to further discussion with Horizon</u> is set out in detail in the Deadline 4 submission (REP4-044).</p> <ul style="list-style-type: none"> — Code of Construction Practice (8.6); — Code of Operational Practice (8.13); — Sub codes of Construction Practice for associated developments; — Wylfa Code of Conduct; — Workforce Management Strategy (8.5); — Workers Accommodation Management Strategy (8.4); — Community Safety Management Strategy; — Health & Wellbeing Strategy; — Operational Travel Strategy; 	<p>Horizon note NWP's position and explained the revised approach to some of the control documents (in particular the CoCP) at the meeting on 24th January. It was agreed at the meeting that Horizon would consider NWP's Deadline 4 submission in detail and propose a form of words which balances NWP's requirement to agree the principles of a scheme or plan with the current structure which requires 'consultation', however HNP cannot concede a right of veto to NWP.</p> <p>Whilst Horizon agrees that the listed documents are of some relevance to NWP it is not agreed that NWP involvement is necessary or appropriate in the monitoring or management of all of these documents.</p>	<p>On-going</p> <p><u>Action: NWP to provide schedule explaining which documents NWP want approval rights over and those which they want to be involved in. Horizon to respond to NWP Deadline 4 response in detail.</u></p>

			<ul style="list-style-type: none"> — Emergency Plans (Nuclear Site Security Plan, Comah Regulations Plan); — Protest strikes (Protest Management Strategy); — Traffic Incident Management Plan/Strategy (TIMP/S) (Part of CoCP); — Construction Traffic Management Plan; — Operation Traffic Management Plan; and — Blue Light Plan (or similar). <p>It will therefore be necessary to agree an appropriate forum for the formulation and monitoring of the above documents.</p>	<p>Horizon note that NWP propose to provide a schedule explaining the level of input that NWP seek on these documents and will reserve further comment until this has been provided.</p> <p>Detailed emergency planning matters will be considered and agreed through the Emergency Services Engagement Sub Group (ESESG) established (and secured through the Wylfa Newydd CoCP, App 414, Para 3.4.6 – 3.4.7) which will work collaboratively on the development of the Community Safety Management Strategy (CSMS). Both Horizon and NWP will be represented on the ESESG.</p>		
Intangible impacts during construction		<p><u>Deadline 3 Submission - Development Consent Order Section 106 Agreement (REP3-042)</u></p> <p><u>Deadline 4 Submission - Development Consent Order Section 106 Agreement Status Note (REP1-010)</u>¹⁴</p>	NWP G.1	<p>NWP has undertaken an assessment of the potential impacts of the development and this <u>will be</u> provided to Horizon for review. NWP has identified the impacts that will arise as the construction gets under way. These will need to be secured within the DCO or a section 106 obligation, with an appropriate mechanism and funding put in place to cater for them.</p>	<p><u>The use of contingency funds has been reduced across the s106 agreement and there is no intention to provide a contingency fund for the emergency services.</u></p> <p><u>Horizon have, however, drafted the agreement so that IACC would have to consult NWP on funding applications from the Community Fund which affected public safety.</u></p> <p><u>Horizon has committed to providing NWP with funding to mitigate additional costs resulting from the Project, through the</u></p>	<p><u>Not agreed</u></p> <p><u>On-going</u></p> <p>Action: Horizon are reviewing the service impact information provided by NWP and will arrange further meetings.</p> <p>Horizon and NWP to discuss s.106 details</p> <p><u>No further action</u></p>

¹⁴ Note that a revised draft s106 Agreement was shared with NWP on 24th January, and will be submitted at Deadline 5.

					section 106 agreement (the Public Services (Police) Fund). Horizon will continue to work with NWP on appropriate mitigation, including that delivered by the draft s.106 agreement.	Red	
Development Consent Obligations / s.106 agreement	Deadline 3 Submission - Development Consent Order Section 106 Agreement (REP3-042) Deadline 1 Submission - Development Consent Order Section 106 Agreement Status Note (REP1-010)	NWP H.1	Further to the assessment undertaken by NWP relating to the potential impacts of the development, a section 106 obligation is required to mitigate those impacts. This assessment has identified specific impacts on the workings and operation of NWP. Mitigation will be provided to NWP in relation to the following measures: a) Local Policing Services - Response, Neighbourhood Policing Team and Local CID b) Custody c) Operational and Emergency Planning d) Road Policing Unit - RPU and Commercial Vehicle Unit e) Force Control Centre f) Managed Response Unit g) Investigation Support Unit h) Crime Services - All functions i) Administration of Justice j) Programme Management and Support	Horizon will continue to work with NWP on appropriate mitigation, including that delivered by the draft s.106 agreement. <u>A draft s106 agreement was issued at Deadline 3 (REP3-042) and has been subject to further review by Horizon. A revised draft was issued to NWP on 24 January and discussed at the meeting on the same date and in further discussions.</u> <u>The revised draft s106 will be submitted at Deadline 5. A draft of the DCO s.106 agreement (the "First Draft Agreement") was circulated to the Isle of Anglesey County Council (IACC) and the Welsh Government on 26 October 2018. An overview of the heads of terms and emerging obligations is set out in the Development Consent Order Section 106 Agreement Status Note.</u> <u>NWP will provide to Horizon their proposed s.106 Heads of Terms prior to 4 December 2018.</u>	On-going	Action: Horizon are reviewing the service impact information provided by NWP and will arrange further meetings. Horizon and NWP to continue to discuss s.106 details	

Topic	Sub topic	Document Reference/ Signpost/ Routemap	SoCG ID	NWP position	Horizon position	RAG	Action required to inform further discussion on issue
Police Impact Assessment		Horizon's Response to NWP Examination Submissions		<p>It is agreed that the "National Police Chiefs Council (NPCC) National Policing Guidelines on Charging for Police Services" methodology on a Full Economic Cost recovery basis will be used to calculate the costs associated with the impacts relating to Policing services.</p>		Agreed	No further action

Commented [JD9]: NWP will agree on this, as it was presented by Gore Associates on 24/01/19 and in their DL5 paper. NWP emailed (04/02/19) Gore and HNP to agree to this but have received no response.

