

Wylfa Newydd Project

Statement of Common Ground between Horizon Nuclear Power Wylfa Limited and Destination Anglesey Partnership

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Examination Deadline 6

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Contents

1	Introduction	1
1.1	Status of this SoCG	1
1.2	Purpose of this SoCG	1
1.3	Description of Development.....	2
	<i>The Wylfa Newydd Project</i>	2
	<i>The Enabling Works</i>	2
	<i>The Wylfa Newydd DCO Project</i>	2
2	Overview of Engagement	4
3	Current Position	6
3.1	Position of Horizon Nuclear Power and DAP	6

List of Tables

Table 2-1	Summary of SoCG Meetings.....	4
Table 3-1	Statement of Common Ground between the DAP and Horizon.....	7

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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 final version at Deadline 6, in accordance with the examination timetable.
- 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, for example the draft s.106 agreement, this is noted where relevant and may change the status of issues recorded in this version of the SoCG.

1.2 Purpose of this SoCG

- 1.2.1 This SoCG is a final agreed document that has been prepared by Horizon Nuclear Power (hereafter referred to as 'Horizon'). 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 DAP on matters relating to the Wylfa Newydd DCO Project.
- 1.2.4 The preparation of this SoCG has been informed by a programme of discussions between Horizon and the DAP and this SoCG has evolved through a series of iterative drafts. Discussions to inform the first draft were initially managed through the first meeting on 5 October 2017 followed by various meetings subsequently to progress SoCG issues. Please refer to Table 2-1 for further details.
- 1.2.5 This SoCG is being 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 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/>

1.3 Description of Development

The Wylfa Newydd Project

1.3.1 The Wylfa Newydd Project includes:

The Enabling Works

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

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

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

The Wylfa Newydd DCO Project

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

The Nationally Significant Infrastructure Project (NSIP)

- **Power Station:** the proposed new nuclear power station, including two UK Advanced Boiling Water Reactors, the Cooling Water System, supporting facilities, buildings, plant and structures, radioactive waste and spent fuel storage buildings and the Grid Connection;
- **Other on-site development:** including landscape works and planting, drainage, surface water management systems, public access works including temporary and permanent closures and diversions of public rights of way, new Power Station Access Road and internal site roads, car parking, construction compounds and temporary parking areas, laydown areas, working areas and temporary works and structures, temporary construction viewing area, diversion of utilities, perimeter and construction fencing, and electricity connections;

- **Marine works comprising:**
 - Permanent Marine Works: the Cooling Water System, the Marine Off-loading Facility, breakwater structures, shore protection works, surface water drainage outfalls, waste water effluent outfall (and associated drainage of surface water and waste water effluent to the sea), fish recovery and return system, fish deterrent system, navigation aids and Dredging;
 - Temporary Marine Works: temporary cofferdams, a temporary access ramp, temporary navigation aids, temporary outfalls and a temporary barge berth;
- **Off-site Power Station Facilities:** comprising the Alternative Emergency Control Centre (AECC), Environmental Survey Laboratory (ESL) and a Mobile Emergency Equipment Garage (MEEG); and

Associated Development

- the Site Campus within the Wylfa Newydd Development Area;
- temporary Park and Ride facility at Dalar Hir for construction workers (Park and Ride);
- temporary Logistics Centre at Parc Cybi (Logistics Centre);
- the A5025 Off-line Highway Improvements;
- wetland habitat creation and enhancement works as compensation for any potential impacts on the Tre'r Gof Site of Special Scientific Interest (SSSI) at the following sites:
 - Tŷ Du;
 - Cors Gwawr;
 - Cae Canol-dydd

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

Licensable Marine Activities

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

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

2 Overview of Engagement

2.1.1 The preparation of this SoCG has been informed by a programme of discussions between Horizon and DAP. Horizon met with DAP to discuss and document common ground on the following dates:

Table 2-1 Summary of SoCG Meetings

Meeting Date	Attendees	Purpose of Meeting
5 th October 2017	Horizon DAP DWD	Initial meeting to discuss approach to SoCG and key issues from PAC2 and PAC3 consultations with chair of DAP
13 th November 2017	Horizon DAP DWD	Second meeting involving chair of the DAP in addition to two other members (who will also attend subsequent meetings) to continue discussions and agree DAP's position
30 th November 2017	Horizon DAP DWD	Meeting to discuss issues relating to accommodation
22nd January 2018	Horizon DAP DWD Quod	Further meeting to discuss issues relating to accommodation. Meeting attended by topic expert as requested
23 rd February 2018	Horizon DAP DWD	Meeting to round up discussions on worker accommodation and seek to agree common ground on other topic areas
16 th March 2018	Horizon DAP DWD IACC	Meeting focused on transport issues attended by topic expert at Horizon, IACC Tourism Officer attended the meeting (and subsequent meetings) as requested by DAP
16 th April 2018	Horizon DAP DWD IACC Quod	Meeting focused on skills attended by topic expert
5 th October 2018	Horizon DAP IACC DWD	Meeting to continue discussions on areas of common ground and outline the Examination process

12 th December 2018	Horizon DAP IACC DWD	Meeting to continue discussions on SoCG including mitigation proposals in the draft DCO s.106 agreement
10 th January 2019	Horizon DAP IACC DWD	Final meeting to seek to resolve areas of common ground prior to submission of SoCG at Deadline 6

3 Current Position

3.1 Position of Horizon Nuclear Power and DAP

- 3.1.1 The following schedule sets out the position of DAP alongside Horizon's position following a schedule of meetings where DAP's key issues were discussed. It sets out matters by topic area and an indication of whether the issue is agreed (green), not agreed (red) or ongoing (amber).
- 3.1.2 It is recognised that there will be some issues that are yet to be agreed which relate to information to be submitted later in the examination process. For these issues, the table sets out the current position based on the information submitted to date.

DAP do not wish to raise objections in relation to any other areas of the project.

Table 3-1 Statement of Common Ground between the DAP and Horizon

Topic	Sub topic	Issue	SoCG ID	Document Reference/ Signpost/ Route map	Destination Anglesey Partnership (DAP) Position	Horizon Position	RAG	Action required to inform discussion on the issue
Overview	Tourism industry	Importance of tourism industry to the island	DAP01	Chapter C1 (Project-wide effects – Socio-economics) (APP-088)	The importance of tourism to the economy of Anglesey is agreed. Chapter C1 of the Environmental Assessment states: "Tourism is vital to the economy of Anglesey." However, there is not agreement on the extent that the Wylfa Newydd Project will affect the industry (this is considered further below in relation to the assessment).	Horizon have prepared the Workforce Accommodation Strategy using best available information, principally 2011 Census data and the Wales Accommodation Occupancy Survey of 2017 to determine supply. The official available data is obtained from questionnaires issued by Welsh Government/IACC and Horizon understands there is a low return on these for a variety of reasons. Horizon's position is confirmed within 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. This is a very small percentage of the overall supply and can be accommodated without undue impact on available supply.	Agreed	No Further Action
Accommodation	Worker Accommodation	Approach to calculating demand for accommodation and staged approach of delivering TWA	DAP02	Workforce Accommodation Strategy (APP-413) Chapter C1 (Project-wide effects – Socio-economics) (APP-088)	The DAP has been concerned throughout consultation that the data for occupancy levels and calculation of supply of bedspaces used within the Workforce Accommodation Strategy (WAS) is inaccurate. The Tourism Bedstock Survey (undertaken by IACC) confirmed that only half of those accommodation providers surveyed were interested in accommodating Wylfa Newydd construction workers which is not in line with Horizon's proposals for worker accommodation.	As Horizon's analysis of supply is based only on the available headroom at the August peak, and therefore would primarily be taking properties that would not be full otherwise, it is considered that Horizon has taken a robust approach to the availability of accommodation in the tourism sector. IACC's Tourism Bedstock Survey, published in 2018, identifies both capacity in the sector and a willingness of providers to rent to workers. This reported average occupancy levels of 58% in the services sector (hotels and B&Bs) and 64% in self-catering, with an August peak of 86% and 88% respectively. It identified supply of 1,601 serviced bedspaces and 3,195 in self-catering. This is significantly lower than the level reported in the JLDP evidence base Tourism Topic Paper which reported 2,225 bedspaces in serviced accommodation and 7,324 in self-catering. The level of interest in letting to Wylfa workers was highest in the serviced accommodation sector (82%) and 55% for self-catering operators. It is likely that interest in letting to workers will increase as certainty over the project increases. Notwithstanding this, Horizon acknowledges concerns about the impact of construction workers on locally available accommodation and proposes the Workforce Accommodation Management Strategy (WAMS) to effectively match supply and demand to avoid local problems. The WAMS will maintain a database of suitable properties and provide a means of workers to find accommodation that meets their needs and be put in contact with the provider. In turn, the WAMS will record data on worker choices and report to an oversight board and will operate to targets set by the board. This management process will be able to adjust the number of rooms offered in	Not agreed	No Further Action

Topic	Sub topic	Issue	SoCG ID	Document Reference/ Signpost/ Route map	Destination Anglesey Partnership (DAP) Position	Horizon Position	RAG	Action required to inform discussion on the issue
						certain locations and sectors (including tourism), to guide workers away from certain places if necessary.		
Accommodation	Delivery of Worker Accommodation	Staged approach of developing worker accommodation	DAP03	Workforce Accommodation Strategy (APP-412) Planning Statement Appendix C Site Campus (APP-406) Phasing Strategy (REP4-014)	<p>DAP have had longstanding concerns about the staged approach of temporary worker accommodation and feel that tourism accommodation should be viewed as a pressure release valve instead of a dependency. Horizon's phasing strategy should ensure the maximum use of agreed and scheduled accommodation in order to protect existing tourism accommodation provision, where potential adverse impacts could be significant. This scheduled accommodation should provide the strongest unmitigated legacy possible.</p> <p>The details of the Construction Worker Accommodation Service (Worker Accommodation Management Service) for managing the distribution of workers is essential including further details of requirement and intervention if impacts are unacceptable. It is also impossible to qualify any statement until further details are provided of the legal requirement of responsive worker accommodation to worker numbers referenced at last SOCG meeting.</p> <p>There is a real concern that the number of 'home based' workers may not be as many as 2,000 due to the substantial journey time. A good proportion of these may also seek accommodation on the island.</p> <p>The DAP recognises Horizon's proposed phasing strategy but concerns remain over Horizon's approach to accommodation.</p>	<p>Horizon's Workforce Accommodation Strategy (WAS) (APP-412) seeks to achieve a number of balanced aims. These include providing additional demand and therefore income to tourism providers by using capacity that would not otherwise be used.</p> <p>Horizon has always acknowledged the importance of tourism to Anglesey and does not wish to damage the industry, in particular by having workers take up too much accommodation so that other tourists are priced out.</p> <p>Horizon's assessment of that capacity has been based on the summer peak and is therefore conservative. For most of the year, existing occupancy levels are significantly lower. This is demonstrated by IACC's Tourism Bedstock Survey which also demonstrates an interest on the part of the sector in accommodating workers.</p> <p>Horizon has proposed to phase delivery of its Site Campus to match the increases in demand from workers. Horizon's approach is reflected in the updated Phasing Strategy [REP4-014] that was submitted at Deadline 4 on 17 January 2019.</p> <p>The phasing strategy requires Horizon to deliver the Site Campus in the following three phases:</p> <ul style="list-style-type: none"> • Deliver the first 1,000 beds of Site Campus prior to exceedance of 2,200 Non-Home Based Workers • Deliver further 1,000 beds prior to exceedance of 4,200 Non-Home Based workers; and • Deliver the final 2,000 beds prior to exceedance of 6,700 Non-Home Based workers <p>In addition the draft s.106 agreement secures an occupancy target on the Site Campus of 85% average occupancy over a 3-month period in order to ensure high occupancy on the Site Campus. If monitoring undertaken by the Developer indicates that occupancy of the Site Campus is below 85% for more than 1 three month period then the Developer will act to incentivise take up of the Site Campus through measures such as pricing and marketing or other incentives agreed with the Council.</p> <p>Horizon acknowledges concerns about the impact of the construction workers on locally available accommodation and proposes the Workforce Accommodation Management Strategy (WAMS) to effectively match supply and demand to avoid local problems. The WAMS will maintain a database of suitable properties and provide a means for workers to find accommodation that meets their needs and be put in contact with the provider. In turn, the WAMS will record data on worker choices and report to an oversight board and will operate to targets set by the board. This management process will be able to adjust the number of rooms offered in certain locations</p>	Not Agreed	No further action

Topic	Sub topic	Issue	SoCG ID	Document Reference/ Signpost/ Route map	Destination Anglesey Partnership (DAP) Position	Horizon Position	RAG	Action required to inform discussion on the issue
Impact of Workers	Scale of onsite solutions	Management of workers of the temporary accommodation	DAP04	Workforce Management Strategy (APP-413)		and sectors (including tourism), to guide workers away from certain places if necessary. Monitoring will include tracking the availability of latent accommodation including Air B&B for potential additional bedspaces becoming available on the market.	Red	
					DAP is concerned over the scale of remote onsite solutions and how desirable large-scale camp accommodation will be to the workers and subsequent levels of take up. Concerns are raised over the impact of the worker community on accommodation providers and local communities and that this has the potential to lead to a negative perception which will adversely affect Anglesey's reputation as a leading tourism destination. Horizon needs to ensure that Anglesey remains open for business.	Horizon's construction team expects the campus to be popular with workers because of the level of facilities and proximity to the site and will facilitate occupancy on the Site Campus in line with the Phasing Strategy, the occupancy targets detailed in the draft s.106 agreement and the WAMS (see DAP03) Horizon has established a Workforce Management Strategy (WMS) (APP-413) and intends to submit an updated version at Deadline 5. Horizon will seek to maximise the number of workers recruited locally through employment initiatives, however many workers will not already live in and around Anglesey and will have to come from outside the community. The WMS describes the commitments made by Horizon to mitigate any adverse effects these workers may have upon the Anglesey communities during the construction of the Wylfa Newydd DCO Project. The strategy includes details of how any potential adverse effects will be managed and mitigated through: <ul style="list-style-type: none"> Horizon's commitments to managing its workforce. See Horizon's response to DAP06 for more detail about these commitments; The contractual obligations which Horizon will impose upon its supply chain; and The terms of employment for the workforce and the Code of Conduct which all of the workforce will be asked to sign. The strategy also describes the monitoring and enforcement action which will be used to ensure the strategy successfully manages and mitigates any adverse effects of the workforce.	Not agreed	No further action
			DAP05	Workforce Management Strategy (APP-413)		Horizon welcomes the opportunities for leisure that will be provided by local businesses and intend to be proactive in creating positive actions for recreational tourism opportunities for staff. Horizon is committed to providing for a range of leisure facilities on site so that workers are encouraged to remain on the Site Campus as far as possible. There will however be opportunities for recreation away from the Site Campus and Horizon is committed to ensuring that workers behave appropriately when off site. In addition to measures to ensure appropriate code of conduct of site, Horizon will deliver the Workforce Management Strategy and Code of Conduct which imposes strict standards of behaviour on workers and ensures effective management of site facilities. Horizon is proposing to employ a community involvement officer and fund IACC to employ an additional officer to help ensure any adverse effects on local communities are minimised. The community involvement officers will deliver a Joint Work Plan	Red	
					DAP feel it is important that contractors are encouraged to make the most of tourism opportunities in their free time, provided the non-home-based workforce are effectively managed so that tourism facilities are neither oversubscribed nor empty. DAP require Horizon to encourage staff to utilise tourism opportunities on the basis that people in the same place for different reasons do not prejudice each other.		Not Agreed	No further action

Topic	Sub topic	Issue	SoCG ID	Document Reference/ Signpost/ Route map	Destination Anglesey Partnership (DAP) Position	Horizon Position	RAG	Action required to inform discussion on the issue
						<p>to deliver a range of actions including promoting community cohesion. This will be secured by the s106 Agreement.</p>	Red	
			DAP06	Workforce Management Strategy (APP-413)	<p>Details of the means that Horizon are going to manage their workforce is required.</p>	<p>Horizon has established a Workforce Management Strategy (WMS) (APP-413) and intends to submit an updated version at Deadline 5 which sets out the measures in detail for Horizon's commitments; the contractual obligations which Horizon will impose on its supply chain; and the terms of employment for the workforce and the Code of Conduct which all of the workforce will be asked to sign.</p> <p>Section 2.2 of the updated WMS sets out Horizon's commitments under the strategy. Section 2.4 of the WMS outlines how worker behaviour will largely be governed through the terms of employment under which the workforce is engaged to work on the Project. These will be based upon appropriate industry standard agreements of the National Agreement for the Engineering and Construction Industry (NAECI 2015); and Construction Industry Joint Council (CIJC) Working Rule Agreement.</p> <p>Alongside this, the workforce will be required to sign the Code of Conduct which will be developed and agreed with its supply chain and trade unions. The Code of Conduct will apply to all personnel for the duration of their employment on the Project including both their time spent on-site and off-site.</p> <p>Section 2.4.4 of the updated WMS sets out some of the principles by which the workforce will be governed within their terms of employment and the Code of Conduct:</p> <ul style="list-style-type: none"> • All personnel will receive a copy of and be required to behave in accordance with the Code of Conduct at all times, regardless of whether they are on-site or off-site. • All personnel will be required to attend and complete all necessary induction and training programmes prior to the commencement of work. • All personnel must respect the Welsh language and culture and be encouraged to demonstrate basic linguistic courtesy through developing these skills during their induction and use within the community. • All personnel must comply with job-specific obligations and requirements (i.e. abiding by constructional and operational controls identified in securing documents) as well as any construction-related plans or strategies. • Personnel must adhere to construction vehicle routes (if appropriate), and this includes construction workers sticking to 'A' class roads, and subsequently avoiding 'B' class roads, 'C' class roads, and unclassified roads, wherever practicable (to avoid causing unnecessary 	Not Agreed	No further action

Topic	Sub topic	Issue	SoCG ID	Document Reference/ Signpost/ Route map	Destination Anglesey Partnership (DAP) Position	Horizon Position	RAG	Action required to inform discussion on the issue
						<p>nuisance and disturbance to local communities).</p> <ul style="list-style-type: none"> • All personnel must be courteous to members of the public and respect and support the needs of the communities in which they work. • All personnel must use the transportation services and facilities provided as part of the Project (i.e. the Park and Ride Facility, shuttle bus services, and car sharing initiatives) to travel to the Wylfa Newydd Development Area. Alternative travel arrangements (i.e. individual cars) must be pre-approved by the individual's employer and will only be allowed in limited circumstances. • All personnel will also comply with any vehicle registration procedures. All personnel using the Park and Ride facility will be required to register their cars and contact details with Horizon. Any personnel found to be parking outside designated areas (or 'fly parking') will be disciplined. • All personnel must register with the Workforce Accommodation Management Service. All non-home-based personnel should seek to use the Workforce Accommodation Management Service to identify and secure accommodation in the first instance, before using other accommodation services. All personnel should provide information on selected accommodation choices when requested for data collection purposes. • All personnel (not just those residing on the Site Campus) should seek to use the temporary health and welfare facilities on the Site Campus in the first instance, before seeking to use community services. Horizon will require construction workers to register with, and, prioritise the use of the on-site medical and healthcare services rather than using the community NHS services. • All personnel to comply with policies regarding drug and alcohol use including: <ul style="list-style-type: none"> – The making, selling and use of any unlawful drugs is strictly prohibited and will result in immediate dismissal. – Personnel should not attend work or carry out work duties under the influence of drugs or alcohol, nor use or possess drugs or 	Red	

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						<p>alcohol at the workplace. If choosing to drink outside of working hours, personnel will drink responsibly and avoid consumption of alcohol that impacts on their ability to perform their role and/or safety on the construction site or brings the Project into disrepute.</p> <ul style="list-style-type: none"> – All personnel will make themselves available for random drug and alcohol testing and related searches during work hours. • All personnel must comply with all health, safety, security and emergency processes and procedures while on-site and challenge (where appropriate) and address and report any non-compliances and breaches immediately. • All personnel must observe and comply with applicable law, regulations and professional standards at all times and ensure no damage of any kind is caused to property within the community. • All personnel must work in a safe and responsible manner with due respect for their safety and safety of others at all times. • All personnel will be required to act as ambassadors for the Project through their behaviour and actions (including their use of social media) when in the community and at all times. • All personnel must treat others with respect and refrain from anti-social, criminal, violent or discriminatory behaviour or sexual harassment and understand that these behaviours will not be tolerated at any time. • Worker accommodation (Site Campus, private, tourist or otherwise) must be treated with respect and maintained in a clean and tidy state, including proper waste disposal. • All personnel residing at the Site Campus must abide by all site protocols and procedures relating to security, parking, housekeeping (for, example, curfews, noise restrictions and emergency procedures), and dispute resolution. • All personnel must be aware of nearby sensitive ecological receptors and their legal protection, which requires compliance with the Conservation of Habitats 	Red	

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						<p>and Species Regulations 2017 and Wildlife and Countryside Act 1981 (that is, the Wylfa Head, Tre'r Gof and Cemlyn SSSIs, the Cemlyn Bay (lagoon) SAC and other local nature reserves). Personnel must seek to avoid damage or interference of any kind to these areas by, for example:</p> <ul style="list-style-type: none"> - keeping to defined paths and behind barrier fencing at all times; - refraining from littering; - refraining from removing or damaging vegetation, habitats, nests and eggs; and - not impacting (damaging, picking, collecting or harming) any species within these areas (particularly nesting species). <ul style="list-style-type: none"> • All personnel must ensure that personal noise levels are appropriate at all times and all locations. • All personnel will comply with the Traffic and Transport Strategy as set out in the Wylfa Newydd Code of Construction Practice [REP2-031] including speed limits, the highway-code, identified route restrictions and be respectful of other road users including agricultural vehicles, pedestrians, cyclists and livestock. <p>Additional workforce requirements for both workforce behaviour and employer behaviour are set out in the Workforce Management Strategy.</p>			
Tourism	Impacts	Perception	DAP07	Section 106 Agreement 6.3.1 ES Volume C – Project-wide effects C1 – Socio Economics (APP-088)	<p>Detail is required of how Horizon is to ensure that effective resources are in place to monitor tourism behaviour, analyse emerging trends and create avoidance strategies prior to appropriate mitigation being put in place to address any adverse trends of impact on perception.</p>	<p>The provision of a Tourism Fund by Horizon will serve to address any material effects which could arise on the sector as a result of the Wylfa Newydd Project. This fund will seek to ensure that the perceived impacts on the local tourism sector can be moderated using positive mechanisms to develop existing and new forms of tourism (see Schedule 3 of the Draft DCO S106 Agreement).</p> <p>The proposed allocations of the funds is as follows:</p> <ul style="list-style-type: none"> • A Tourism (Annual) Contribution to deliver the measures within a Tourism Action Plan to be prepared by IACC (in consultation with Welsh Government, Gwynedd Council, Destination Anglesey Partnership and Horizon) • A Tourism Officer Contribution • A Tourism (WG Annual Monitoring) Contribution to be paid to the Welsh Government for part-sponsoring the existing 	Not Agreed	No further action	

Topic	Sub topic	Issue	SoCG ID	Document Reference/ Signpost/ Route map	Destination Anglesey Partnership (DAP) Position	Horizon Position	RAG	Action required to inform discussion on the issue
						<ul style="list-style-type: none"> Welsh Government tourism surveys in addition to future monitoring work Horizon is also committed to delivering a Permanent Visitor Centre with an application for planning permission to be made within three months of implementation of the Wylfa Newydd DCO Project and to implement that planning permission in order to target opening of the Visitor Centre within two years of grant of that permission. 	Red	
Impacts of Workers	Transport	Impact of daily workforce movements	DAP08	ES Volume C - Project-wide effects C2 - Traffic and Transport (APP-089) Volume C Road Traffic-related effects (project wide) App C2-4 - DCO TA Appendix F - Integrated Traffic and Transport Strategy (APP-107) Code of Operational Practice (REP2-037) Code of Construction Practice (REP2-031)	<p>DAP is concerned of the effects of single person car journeys on local roads as well as workers parking at non-designated locations which will have a damaging effect on the industry and need to fully understand Horizon's Transport Strategy including proposals for car sharing and parking at designated car parking and subsequent travel arrangements.</p> <p>In the preparation of the DCO documents, traffic studies were conducted to understand the baseline vehicular movements in the study area and then modelling was carried out to assess the additional traffic generated by the Project. The Transport Assessment (APP-101) has modelled the transport impacts of the Project and demonstrates that the overall highways impact of the Project should not cause unacceptable impacts to the highway network.</p> <p>For those not living at the Site Campus, it is expected that car sharing and buses will be at the heart of workers' daily routines. Horizon is proposing a transport strategy that includes incentives for car sharing such as preferential parking and a strategy for vehicle occupancy of an average of 3 workers per car at the WNDA and 1.5 workers per car at the Park and Ride facility, averaging at 2.0 per vehicle across the project in the peak year of construction.</p> <p>Horizon has recently amended the WN Code of Construction Practice (to be submitted at Deadline 5) to strengthens its commitment to car sharing as follows:</p> <p>“During the majority of the construction programme, most of the construction workers wishing to drive to the WNDA Site or Park and Ride Site will be required to car share. Horizon will target an average car share ratio of 2.0 people per car in the peak construction year.”</p> <p>Horizon will therefore implement a car-sharing database which will likely utilise internet and mobile phone based applications to match workers who wish to drive to the WNDA or Park and Ride sites. The Construction Workers Accommodation Management Portal will be used as a basis to form the database (paragraphs 5.4.9-5.4.10 of WN CoCP, REP2-031).</p> <p>The level of car sharing required will vary depending on the number of construction workers, the availability of parking spaces, and the number of construction workers travelling to site by non-car modes such as shuttle buses, amongst other factors. Vehicle occupancy requirements, and changes to them, will be advertised clearly to all construction workers well in advance.</p> <p>The existence of such a database and matching system will be communicated to all employees, including that non-adherence</p>	Red	Not Agreed	No further action

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						<p>to the car-share policy could result in refusal of entry to the WNDA or Park and Ride car parks.”</p> <p>Horizon has also strengthened the commitment to enforce the transport strategy in the WN CoCP by including the following text:</p> <p>“Horizon commits to manage, monitor and regulate the availability of car parking spaces to reflect the number of workers on the Project, balancing an over-provision of car parking (which could encourage car travel) with an under-provision of car parking (which could encourage fly parking).</p> <p>Included in the information packs will be likely enforcement actions for breaches of the travel commitments made in this Wylfa Newydd CoCP, with examples such as:</p> <ul style="list-style-type: none"> • improvement to communications protocol and channels; • appropriate warnings; • temporary or permanent removal of approval to park on site; • temporary suspension or permanent removal of suppliers/driver/workers who continually fail to adhere to the commitments set out in this Wylfa Newydd CoCP.” <p>Workers who are caught fly-parking or parking illegally in order to walk to the Wylfa Newydd Development Area or car share will face enforcement action, including disciplinary procedures as detailed in the Workforce Management Strategy (paragraph 6.5.42 of APP-413).</p> <p>In addition to car sharing, the Project includes a significant number of shuttle buses between Holyhead, Bangor, Caernarfon and the Wylfa Newydd Development Area (paragraph 5.3.5 of WNCoCP, REP2-031)</p> <p>Parking management and enforcement will be developed to minimise impacts on local residents and prevent indiscriminate parking. A dedicated and free telephone hotline will be made publicly available for members of the public to report fly or illegal parking activity associated with the Project. A complaints register will be also maintained by Horizon. All calls will be logged and mapped, together with a record of the responses and action taken. Furthermore, Horizon’s proposed shift patterns are controlled using staggered start and finish periods to manage the numbers of workers arriving on site during the morning and evening to avoid AM and PM peak hours as far as practicable. Horizon is proposing to make changes to shift patterns from those originally submitted in the DCO application, and has gone out to consultation accordingly (from 8th November – 6th December 2018). The assumed shift patterns in the application involve three staggered shifts in both the day and night time periods. These were chosen to avoid increased traffic flows across Britannia Bridge during the morning and evening peak periods. Since DCO submission,</p>	Red	

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					<p>Horizon has identified that the shift times applied for result in an overlap between the day and night shifts that makes a part of each shift unproductive, posing a significant challenge to the construction programme. Horizon wants to build greater efficiency and resilience into the construction programme by adjusting the shift patterns while continuing to avoid adverse effects on Britannia Bridge. New shift patterns have been identified which achieve these aims, as follows:</p> <ul style="list-style-type: none"> in the early years of construction, two staggered day shifts and one night shift during peak construction years, three staggered day shifts and two staggered night shifts changes to shift start times and shift duration <p>The changes are explained in more detail in the technical document available as part of the consultation (REP1-014).</p> <p>The Workforce Management Strategy (APP-413) states that any personnel found to be parking outside designated areas (or 'fly parking') will be disciplined.</p>	<p>Horizon has sought where possible to limit impacts during the AM and PM peak hours throughout the construction programme on all areas of the highway network. However it is not possible to avoid Friday and Saturday afternoons and the August peak during the construction period.</p>	Red	
			DAP09	<p>ES Volume C - Project-wide effects C2 - Traffic and Transport (APP-089)</p> <p>Volume C Road Traffic-related effects (project wide) App C2-4 - DCO TA Appendix F - Integrated Traffic and Transport Strategy (APP-107)</p>	<p>DAP is also concerned that the project has the potential to conflict with the peaks in transport for the tourism sector which include Friday and Saturday afternoons, Bank Holidays, Summer and throughout August.</p> <p>DAP requests that Horizon commits to avoiding these peaks and accommodate local events that require road closures and traffic easements and would otherwise be negatively affected by vehicles associated with the Wylfa Newydd Project.</p>		Not Agreed	No further action
			DAP10	<p>ES Volume C - Project-wide effects C2 - Traffic and Transport (APP-089)</p> <p>Volume C Road Traffic-related effects (project wide) App C2-4 - DCO TA Appendix F - Integrated Traffic and Transport Strategy (APP-107)</p>	<p>DAP is concerned that the project has the potential to conflict with transport peaks associated with major events including Tour De Môn, Anglesey Show and Island Games and other future events.</p>	<p>In respect of exceptional individual events, including Tour de Môn, contractor agreements will include arrangements to ensure that the Project is compatible with such events, for example the part closure of the A5025 during the Tour de Môn. A fundamental aspect of the project is forward planning which includes matters relating to transport, through the logistics centre and construction traffic management arrangements set out in the A5025 Off-line Highway Improvements sub-CoCP (APP-420). It is envisaged that the Project will be flexible enough to accommodate future events and their associated requirements for reduced traffic flows where possible. Part of the role of the Tourism Action Plan could be to forward plan upcoming events and to highlight that adequate planning is necessary to mitigate transport peaks associated with the Wylfa Newydd DCO Project and the tourism sector.</p>	Not Agreed	No further action

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Legacy	Marketing and promotion	Post construction	DAP11	Jobs and Skills Strategy (APP-411)	Horizon needs to ensure that provisions are in place as part of the DCO for an active tourism marketing and promotion campaign pre, during and post-construction.	<p>In acknowledgement of the importance of the tourism sector to the economy of Anglesey, Horizon will provide a Tourism Fund to serve to address any material effects which could arise on the sector as a result of the Wylfa Newydd Project. This fund will seek to ensure that the perceived impacts on the local tourism sector can be moderated using positive and proactive mechanisms to develop existing and new forms of tourism.</p> <p>The Draft DCO S106 Agreement which was issued to IACC and the Welsh Government on 23 January 2019 outlines the scope of the tourism related contributions including the Tourism (Annual) Contribution.</p> <p>Schedule 3 of the Draft DCO S106 issued to IACC and the Welsh Government dated 23 January 2019 identifies Horizon will make a Tourism Officer Contribution for IACC to fund a Tourism Officer for the duration of the Construction Period and an annual tourism contribution (Schedule 3 Section 3 of the Draft DCO S106) to IACC during construction and annually for a period of two years from the commencement of operation of Unit 2 to be used for developing and delivering the Tourism Action Plan in consultation with the Welsh Government, Gwynedd Council, Destination Anglesey Partnership and the developer (Schedule 3 Section 1 of the draft S106 Agreement).</p> <p>Horizon considers the proposed allocation of tourism funding provides robust mitigation for potential effects on tourism.</p>	Not Agreed	No further action
Legacy	Visitors centre	Post construction	DAP12	ES Volume D – WNDA Development D1 – Proposed Development (APP-120) S106 Heads of Terms	The DAP recognise that Horizon is committed to the early delivery of the Visitor Centre and feel the facility represents a significant benefit to the tourism sector, however the DAP feel the wording of the commitment is not robust enough and with the understanding that S106 discussions are ongoing, do not feel they could endorse this action.	<p>Horizon considers that the early commitment to the Visitor Centre represents a significant benefit for the tourism sector and will provide a long lasting legacy on Anglesey.</p> <p>Horizon proposes to submit an application for planning permission with three months of implementation of the Wylfa Newydd DCO Project and to implement that planning permission in order to target opening of the Visitor Centre within two years of grant of that permission.</p> <p>Horizon's commitment is set out within the Draft s.106 Agreement</p>	Not Agreed	No Further Action
Tourism	Service Sector Workforce	Displacement of Workforce	DAP13	Jobs and Skills Strategy and Environmental Statement (APP-411) ES Volume C - Project-wide effects C1 - Socio-economics (APP-088)	<p>The DAP recognise the importance of training of future workforce in 'STEM' subjects. Great concern remains over the displacement of service sector workforce, considering a current and long-standing recruitment issue, into supporting worker accommodation. It is considered the demands of the project will lead to significant staffing issues in the hospitality sector (including catering). An early intervention is critical similar to that in place to promote the STEM pathway replicated in the hospitality industry to promote careers in the sector and motivate people to pursue careers in hospitality/tourism. This needs to be considered through to post build.</p> <p>Also an early identification of need and transferability into both current and emerging tourism sector work is critical to ensure smooth transition into build phase and creation of employment pathway post build.</p>	<p>At this stage it is impossible to know the likely scale of the potential backfilling needs, or in which occupations it might occur. Horizon is therefore proposing that any employer facing this situation should have access to the Wylfa Newydd Employment and Skills Service (WNESS) and be able to use it to backfill vacancies.</p> <p>Given that the WNESS will be trying to recruit into the roles that might be taken up, it should have a supply of job-ready people who would be equally skills to backfill vacancies as they would to take a job on the Wylfa Newydd Project. The North Wales Regional Skills Partnership has also identified the hospitality/food sector as a key sector for skills development and is undertaking additional work to develop additional skills in the sector, using Anglesey as a pilot.</p> <p>Horizon has committed to preparing a Jobs and Skills Implementation Plan (JSIP) which will, amongst other things, monitor the impacts of the Wylfa Newydd Project on the local</p>	Not Agreed	No further action

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					<p>labor market within the DCCZ including on labour churn and workforce planning in the tourism (including the food sector), health and social care, education, construction, and service sectors.</p> <p>Schedule 4 Section 2 of the Draft DCO S106 Agreement which was issued to IACC and the Welsh Government on 23 January 2019 explains the JSIP in more detail. The JSIP will:</p> <ul style="list-style-type: none"> Establish processes for identifying opportunities by which Horizon and its contractors and the Council will identify skills and training gaps and opportunities to meet the needs of the Wylfa Newydd DCO Project; Identify a programme for delivery of the training to fill the identified skills and training gaps and opportunities where such training will be delivered by Grwp Llandrillo Menai and other specialised training partners; Identify a programme for getting unemployed persons back into the workplace, to be delivered by the Council; Fill the identified skills training gaps and opportunities, where such training will be delivered by Grwp Llandrillo Menai and other specialised training partners; Require monitoring of the impacts of the Wylfa Newydd DCO Project on the local labour market within the DCCZ including displacement and workforce planning in the tourism (including the food sector), health and social care, fire service, education and construction sectors <p>In addition to monitoring performance indicators under the final JSIP the Council will, including Grwp Llandrillo Menai and other training providers engaged, monitor and report to the Jobs and Skills Engagement Group on a six monthly basis on:</p> <ul style="list-style-type: none"> The training programmes delivered; The number of people put through training programmes; The number of graduates from training programmes subsequently entering the workplace within 2 months of completing their programme; and Other matters agreed with the Jobs and Skills Engagement Group <p>Section 4 Schedule 4 of the draft S106 Agreement sets out the Jobs and Skills Contribution will be paid by Horizon to IACC for onward payment to Grwp Llandrillo Menai and other specialised training partners for the purposes of delivering the training identified in the JSIP.</p>	Red		
Tourism	Training	Horizon sponsored training in hospitality sector	DAP14	Jobs and Skills Strategy (APP-088)	DAP ask Horizon to support training across tourism and hospitality sectors and to assist filling local vacancies caused by displacement	Horizon's position is that the Jobs and Skills Strategy will set out how Horizon will work with the Welsh Government and North Wales Economic Ambition Board/North Wales Regional Skills Partnership to fund and facilitate the timely delivery of additional training to meet the specific skills needs identified for the Project. This will enable training in advance of potential employment to ensure local employment opportunities are maximised. Additionally the proposed use of the WNESS by	Not Agreed	No further action

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						<p>tourism businesses is anticipated to provide businesses with pool of labour to be trained where there is evidence that tourism businesses will be impacted.</p> <p>Furthermore, as identified in Horizon's position on SoCG ID DAP13, the JSIP and Jobs and Skills Contribution will support Grwp Llandrillo Menai and other specialised training partners for the purposes of delivering the training programmes identified in the JSIP.</p>		
Tourism	Mitigation	Mitigation Fund	DAP15	Mitigation Route Map (APP-422)	<p>DAP confirms that all impacts should be minimised as far as possible through suitable mitigation before they arise in order to protect and enhance the tourism industry, the quality of offer and visitor and local produce perception.</p> <p>DAP considers that these negative effects are already in place, such as the diversion of tourism staff time, without alternative resources available to cover essential posts.</p> <p>Request more information on the scale (reference Hinkley) of and how the mitigation fund will be allocated and utilised.</p> <p>DAP welcome opportunity to work in partnership to solve challenges by using innovative models e.g. Somerset Larder.</p>	<p>In acknowledgement of the importance of the tourism sector to the economy of Anglesey, Horizon will provide for a range of contributions relevant to the tourism sector.</p> <p>The draft DCO S106 Agreement issued to IACC and the Welsh Government on 23 January 2019 outlines the scope of tourism related contributions. Please refer to DAP07 for further information.</p> <p>Horizon considers that the proposed package of contributions, alongside the early delivery of a permanent Visitor Centre, to be adequate mitigation to address any material effects which could arise on the sector as a result of the Wylfa Newydd Project.</p>	Not Agreed	No further action

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