



## Wylfa Newydd Project

Statement of Common Ground between  
Horizon Nuclear Power Wylfa Limited and the  
Isle of Anglesey County Council

PINS Reference Number: EN010007

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Revision 2.0

Examination Deadline 6

Regulation Number: 5(2)(q)

Planning Act 2008

Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

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# Contents

1	Introduction .....	1
1.1	Status of this document .....	1
1.2	Purpose of this document .....	1
1.3	Role of IACC in the DCO process.....	2
1.4	Description of Development.....	3
	<i>The Wylfa Newydd Project</i> .....	3
1.5	Pre-application consultation.....	5
1.6	Post-application consultation .....	7
2	Project Vision and Objectives .....	9
2.1	Project Vision.....	9
2.2	Project Objectives.....	9
3	Current Position .....	11
3.1	Current position of this SoCG .....	11
3.2	Summary of discussions on draft S106 .....	11

## List of Tables

Table 1-1	Focus Group Themes.....	6
Table 1-2	Post-Submission SoCG Meetings with IACC .....	7
Table 3-1	Statement of Common Ground between the IACC and Horizon .....	13

## List of Figures

Figure 1-1	Wylfa Newydd Engagement Framework .....	5
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# 1 Introduction

## 1.1 Status of this document

- 1.1.1 This Statement of Common Ground (hereafter referred to as the 'SoCG') is being submitted to the Examining Authority by Horizon Nuclear Power (hereafter referred to as 'Horizon') to reflect the position of Horizon and Isle of Anglesey County Council ('IACC') at Deadline 6, in accordance with the examination timetable.
- 1.1.2 It is an accurate reflection of what Horizon believes to be the agreed, disagreed and ongoing matters at Deadline 6, following provision of a final draft SoCG by Horizon to IACC on 30<sup>th</sup> January 2019 and high level comments provided by IACC on 12<sup>th</sup> February 2019. It is not however being submitted as a document that has been formally endorsed by IACC.
- 1.1.3 It has been agreed between both parties that meetings will continue to take place leading up to the hearings between 4<sup>th</sup> and 8<sup>th</sup> March 2019 to seek to increase areas of common ground. Where this changes the status of issues recorded in this SoCG, the parties will update the Examining Authority as appropriate.
- 1.1.4 It is noted that where this SoCG relies on documents which are due to be submitted at later deadlines in the examination, this is noted where relevant and may change the status of issues recorded in this version of the SoCG.

## 1.2 Purpose of this document

- 1.2.1 This SoCG has been prepared by Horizon and IACC. It has been prepared in accordance with the guidance published by the Department of Communities and Local Government (hereafter referred to as 'DCLG Guidance')<sup>1</sup> and example SoCG documents provided on the Planning Inspectorate's website<sup>2</sup>.
- 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"*

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<sup>1</sup> 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/examination\\_guidance-final\\_for\\_publication.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/418015/examination_guidance-final_for_publication.pdf)

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

- 1.2.3 The aim of this SoCG is to therefore provide a clear position of the state and extent of discussions and agreement between Horizon and IACC on matters relating to the Wylfa Newydd Project as at Deadline 6.
- 1.2.4 The preparation of this SoCG has been informed by a programme of discussions between Horizon and IACC. Discussions to inform the first draft SoCG were initially managed through Focus Group meetings, which were attended by IACC along with other parties including the Welsh Government and Natural Resources Wales (NRW), and were held monthly up until May 2017 (see further detail at Table 1-1 below later in this section). They have since been replaced by SoCG Coordination Groups which meet twice monthly or monthly, as appropriate, supplemented by individual meetings with the IACC on matters specific to the SoCG between them and Horizon.
- 1.2.5 This SoCG has evolved through a series of iterative drafts. The first draft of the SoCG was provided by Horizon in August 2017 for input and comment by the IACC. The purpose of the SoCG is to set out agreed factual information about the application for development consent to be made by Horizon for the construction and operation of a new nuclear power station at the Wylfa Newydd Development Area (hereafter referred to as 'WNTA') together with on and off-site associated development (hereafter referred to as 'the Wylfa Newydd DCO Project').
- 1.2.6 A series of topic-specific workshops were held between IACC and Horizon in August 2018. Please refer to Section 1.5 for further details.
- 1.2.7 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.

### **1.3 Role of IACC in the DCO process**

- 1.3.1 IACC's role in relation to Nationally Significant Infrastructure Projects (NSIPs) determined under the Planning Act 2008 is as a statutory consultee. The IACC is also the Local Planning Authority (LPA) for any planning applications for, e.g. Site Preparation and Clearance and the On-line Highway Improvements to come forward separately pursuant to the Town and Country Planning Act (TCPA).
- 1.3.2 IACC would be responsible for discharging many of the requirements (akin to planning conditions) associated with an NSIP in their area if development consent is granted. IACC will be responsible for monitoring and enforcing many of the DCO provisions and requirements.
- 1.3.3 Horizon has been working with IACC to ensure that its knowledge in relation to local perspectives; local residents; groups and businesses has been able to influence the development of detailed mitigation solutions for the Project.

## 1.4 Description of Development

### *The Wylfa Newydd Project*

- 1.4.1 The Wylfa Newydd Project includes:

#### *The Enabling Works*

- 1.4.2 The Enabling Works comprise the Site Preparation and Clearance Proposals (SPC Proposals) and the A5025 On-line Highway Improvements.
- 1.4.3 Horizon has submitted applications for planning permission for the Enabling Works under the Town and Country Planning Act 1990 to the Isle of Anglesey County Council (IACC) as local planning authority. The On-line Highway Improvements were granted planning permission on 13th July 2018 (ref: 27C106E/FR/ECON). The planning authority resolved to grant the SPC application subject to the signing of a legal agreement on the 5th September 2018. The 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.
- 1.4.4 In order to maintain flexibility in the consenting process for the Wylfa Newydd DCO Project, the SPC Proposals have also been included in the DCO application. The A5025 On-line Highway Improvements are not part of the DCO application.

#### *The Wylfa Newydd DCO Project*

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

#### *The Nationally Significant Infrastructure Project (NSIP)*

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

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

#### ***Associated Development***

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

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

#### **Licensable Marine Activities**

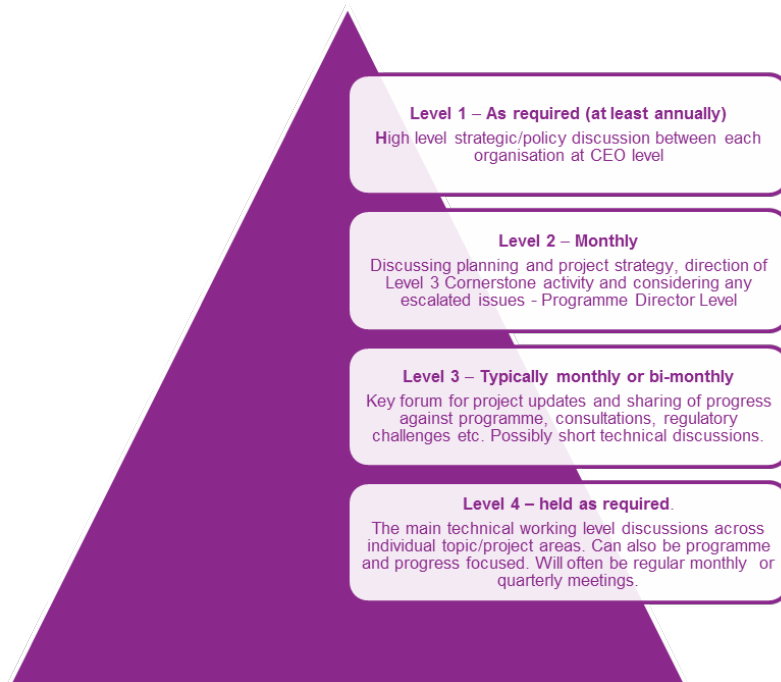
- 1.4.7 The Licensable Marine Activities comprise the Marine Works and the Deep Disposal (i.e. the disposal of material from dredging at the Disposal Site at Holyhead North). The Licensable Marine Activities will be consented under a Marine Licence, however the Marine Works would also be consented under the DCO.
- 1.4.8 A more detailed description of development is contained at Chapter 4 of the Planning Statement (APP-406).



## 1.5 Pre-application consultation

- 1.5.1 Horizon has undertaken an extensive and comprehensive period of engagement with the IACC throughout the pre-application period.
- 1.5.2 Full details are provided in the Main Consultation Report (APP-037). In summary, however, an overarching engagement framework with IACC (amongst others, including Welsh Government and NRW) was established and agreed, as illustrated in Figure 1-1 below:

**Figure 1-1 Wylfa Newydd Engagement Framework**



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

**Table 1-1 Focus Group Themes**

Focus Group Theme	Attendance	Frequency
Welsh Language and Culture	IACC, Welsh Government, Welsh Language Impact Assessment Steering Group Chair	5 meetings between January and May 2017
Economic Development and Supply Chain	IACC, Welsh Government	4 meetings between January and May 2017
Tourism	IACC, Welsh Government, Gwynedd County Council	4 meetings between January and May 2017
Transport	IACC, Welsh Government, Gwynedd County Council	6 meetings between December 2016 and May 2017
Education, Skills and Labour	IACC, Welsh Government	4 meetings between January and May 2017
Health and Well Being	IACC, Welsh Government, NRW, BCUHB, Public Health Wales, Welsh Ambulance Service, North Wales Fire and Rescue, North Wales Police	4 meetings between January and May 2017
Housing/Accommodation Strategy	IACC, Welsh Government	4 meetings between January and May 2017
Environment	IACC, Welsh Government, NRW	2 meetings in February and March 2017

- 1.5.5 The Focus Groups informed the preparation of a SoCG tracker which recorded priority issues raised by IACC, Welsh Government and other Focus Group attendees in response to Horizon's Stage Two Pre-Application Consultation. In order to inform discussions at the Focus Groups, a series of Level 4 (technical) meetings were also held, as required, across a number of topics with IACC, Welsh Government and NRW and other statutory consultees, including National Trust, NWWT and RSPB. This included, for example, detailed discussions on housing and accommodation, transport and environmental matters such as impact on Sites of Special Scientific Interest (SSSI). Approximately five Focus Groups were held for each topic area, including a series of Focus Group meetings in May 2017 which were intended principally to confirm outstanding priority issues, particularly focussed on baseline and methodology, as the outcome of the assessments for many topic areas was not yet available.

- 1.5.6 In addition, a SoCG Coordination Group, attended by Horizon, IACC, Welsh Government and NRW, was held as required to discuss strategic and cross-cutting issues.
- 1.5.7 Horizon shared draft application documents with IACC, amongst other statutory consultees, during the months of February to April 2018. This included a large proportion of the documents that eventually made up the DCO Application submission.
- 1.5.8 IACC provided comments on these documents which were taken into account in the development of final documents to support the DCO. These draft documents have also served to develop, and inform ongoing discussions associated with the SoCG.
- 1.5.9 Horizon then held a SoCG drafting workshop (Level 2) with IACC on 17<sup>th</sup> April 2018 to discuss key issues to be addressed in the SoCG and how consultation and discussion would continue following submission of the DCO Application. It was agreed, amongst other things, that a further meeting(s) to focus on the SoCG would be held in the weeks following submission of the DCO Application.

## 1.6 Post-application consultation

- 1.6.1 The DCO Application was submitted by Horizon on 1<sup>st</sup> June 2018 and was accepted for examination by the Secretary of State on 28<sup>th</sup> June 2018.
- 1.6.2 Horizon met with IACC on 24<sup>th</sup> June 2018 to have a further SoCG workshop (Level 2), following an initial review of the submitted DCO Application and associated documents by IACC. The meeting highlighted key areas of focus for IACC, where some SoCG positions had changed and where further detail was required from Horizon.
- 1.6.3 The IACC made relevant representations on the DCO Application to the Planning Inspectorate on 9<sup>th</sup> August 2018.

Horizon then held a series of topic specific meeting with IACC to seek to agree common ground as follows:

**Table 1-2 Post-Submission SoCG Meetings with IACC**

Topic	Date
Local Employment, Skills and Supply	11 <sup>th</sup> October 2018
Tourism	11 <sup>th</sup> October 2018
Highways and Transport	12 <sup>th</sup> October 2018
Air Quality and Noise	12 <sup>th</sup> October 2018
Education and Training	16 <sup>th</sup> October 2018
Welsh Language and Culture	16 <sup>th</sup> October 2018
Landscape, Historic Environment, Ecology, Visual Amenity	17 <sup>th</sup> October 2018

Topic	Date
Housing	18 <sup>th</sup> October 2018
Site Campus	18 <sup>th</sup> October 2018
Traffic and Transport	18 <sup>th</sup> December 2018
Traffic and Transport	16 <sup>th</sup> January 2019
Traffic and Transport	1 <sup>st</sup> February 2019

- 1.6.4 Prior to each meeting, Horizon and IACC agreed an agenda, including key matters to discuss and seek agreement on. Actions points were agreed at each meeting and Horizon provided responses to these where possible in advance of a meeting.
- 1.6.5 Horizon shared the updated version of the draft DCO s.106 and the Phasing Strategy with IACC on the 23<sup>rd</sup> January 2019 and the draft Wylfa Newydd Code of Construction Practice (CoCP) and Workforce Management Strategy on 1<sup>st</sup> February 2019. IACC has not yet had an opportunity to consider these updated documents in the drafting of this SoCG.
- 1.6.6 Chapter 3 of this SoCG represents the current position in respect of the main thematic areas of interest to IACC.

## 2 Project Vision and Objectives

### 2.1 Project Vision

#### 2.1.1 Horizon's Vision is as follows:

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

#### 2.1.2 IACC's Vision is as follows:

*"The New Nuclear Build at Wylfa is a positive driver for the transformation of the economy and communities on Anglesey, providing sustainable employment opportunities, improving the quality of life for existing and future generations and enhancing local identity and distinctiveness".*

### 2.2 Project Objectives

#### 2.2.1 Realising both parties' vision will be achieved through the following objectives to be achieved through the provision of appropriate mitigation either to be secured through an appropriately worded DCO requirement, certified control document or through an appropriate planning obligation within the s106 agreement:

- Help to meet the energy challenge in the UK, by providing a reliable source of low carbon electricity;
- Complying with all safety and security requirements to ensure a secure and safe project with robust emergency planning;
- Provide employment through well paid jobs on fair and consistent terms for everyone working on the Project;
- Develop education and skills support for people of all ages and backgrounds to compete for the jobs on offer;
- Support for businesses to take up sourcing and supply chain opportunities;
- Promotes the sustainable movement of people and materials and provides resilient transportation infrastructure capable of attracting and sustaining economic growth and creating sustainable communities;
- Improvements in the quality of life and health and wellbeing of residents;
- Enhancement of Welsh Language and Culture;
- Develop a green and sustainable approach in the development and management of the buildings and operational activities;

- Be a good neighbour; keeping local disruption to a minimum throughout the project life cycle;
- Build on the legacy of the existing power station, and help to create a positive legacy for Anglesey; thinking about each significant investment and how it can create a positive future for the area, where appropriate;
- Ensure that all the elements are designed to connect with the varied beauty and character of Anglesey and conserves and enhances the Island's distinctive environment and resources, taking into account climate change, as much as possible;
- Respect and support cohesive local communities and ensure that the effect of the Project on them is minimised and that opportunities to provide enhancements are taken, as far as possible.
- Consideration of the wider spatial impacts of the proposed development in respect of North Wales and Wales.

## 3 Current Position

### 3.1 Current position of this SoCG

- 3.1.1 The following schedule (Table 3-1 on the following pages) sets out the position of IACC alongside Horizon's position, following the series of topic specific meetings in respect of the key thematic areas of interest to IACC.
- 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 shared by Horizon for submission at Deadline 5 and that submitted to date.
- 3.1.3 For ongoing positions, these are the respective positions of each party and should not infer agreement of the other party to the accuracy of the statements made.
- 3.1.4 For ease of reference the topics are set out in the tables in the following order (note that this differs from the order previously provided to the Examining Authority and IACC):
  - 1. Detailed description of development
  - 2. Planning policy
  - 3. Need
  - 4. Monitoring
  - 5. Welsh Language and Culture
  - 6. Economic development and supply chain
  - 7. Tourism
  - 8. Transport and infrastructure
  - 9. Health and wellbeing
  - 10. Housing and accommodation strategy
  - 11. Digital infrastructure
  - 12. Environment
  - 13. Education, skills and labour

### 3.2 Summary of discussions on draft S106

- 3.2.1 Following receipt of representations, the outcome of the January s106 issue specific hearing, and a quad-partite call (IACC, Gwynedd, Welsh Government and Horizon) on 14 January 2019, Horizon prepared and circulated an updated draft s106 agreement on 23 January 2019. Subsequent general and topic based conference calls have been held between Horizon and IACC to discuss specific aspects of the draft agreement in relation to accommodation and other socio-economic issues. IACC and the Welsh Government have provided mark ups back on various parts of the agreement and further drafting is currently being undertaken by Horizon. Horizon is continuing to discuss the

approach to planning obligations with IACC, and further quad-partite sessions are anticipated.

3.2.2 The principal changes as regards governance made to the s106 agreement since the last submission at Deadline 3 (REP3-042) to the Examining Authority are that:

- payments are now paid up front to IACC, either to administer themselves or for onward payment to a third party,
- Contingency funds are now either translated into annualised payments or released according to specific triggers related to monitoring, rather than held in contingency and released following a recommendation by the Wylfa Newydd Major Permissions Oversight Panel; as such
- The need for the WNMPOP has been avoided and the WNPOP is no longer proposed.

3.2.3 As a result of these discussions, significant progress has been made and the parties continue to work collectively to ensure that an agreed version of the S106 can be submitted to the Examining Authority by the end of the examination.

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

Topic	Sub topic	Issue	SoCG ID	Document Reference /Signpost/ Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
DETAILED DESCRIPTION OF DEVELOPMENT								
Detailed description of development	Detailed description of development	Detailed description of each element of the development (including Power Station, Site Campus, Dalar Hir Park & Ride, Parc Cybi Logistics Centre and Marine Works)	IACC-0001	See document references in Horizon and IACC Position in the adjacent column	A description of elements of the development is contained in the following documents: <ul style="list-style-type: none"><li>Power station and other on-site development – see Volume D, Chapter 1 of the Environmental Statement (ES) (APP-120);</li><li>Marine Works – see Volume D, Chapter 1 of the Environmental Statement (APP-120);</li><li>Off-Site Power Station Facilities – see Appendix B of the Planning Statement (APP-406); Volume E, Chapter 1 of the ES (APP-239; and Volume 3 of the Design and Access Statement (REP4-018);</li><li>Site Campus – see Appendix C of the Planning Statement (APP-406); Volume D, Chapter 1 of the ES (APP-120) and Volume 3 of the Design and Access Statement (REP4-018);</li><li>Logistics Centre – see Appendix E of the Planning Statement (APP-406); Volume H, Chapter 1 of the ES (APP-355); and Volume 3 of the Design and Access Statement (REP4-018);</li><li>Park and Ride Facility – see Appendix D of the Planning Statement (APP-406); Volume F, Chapter 1 of the ES (APP-266); and Volume 3 of the Design and Access Statement (REP4-018); and</li><li>A5025 Off-line Highways Improvements - see Appendix F of the Planning Statement (APP-406); Chapter G1 of the ES (APP-304) and Volume 3 of the Design and Access Statement (REP4-018).</li></ul>		Agreed	No further action
	Design rationale (Policy AMG3)	A description of how the environmental and social baselines have influenced the design, scale, nature and site selection of the various elements of the development	IACC-0002	See document references Horizon and IACC Position in the adjacent column	Design and Access Statement, Volume 2, Power Station Site (REP4-017) and Design and Access Statement, Volume 3, Associated Developments and Off-Site Power Station Facilities (REP4-018) provide a contextual analysis of the proposed development, including: <ul style="list-style-type: none"><li>a physical assessment;</li><li>socio-economic context;</li><li>some of the relevant legislative issues; and</li><li>a summary of Horizon’s position on opportunities and constraints.</li></ul> The above documents are supported by the Site Selection Report, Volumes 1-7 (APP-436 to APP-442) and the Alternative and Design Evolution chapters of the ES (Volume D, Chapter D2 of the Environmental Statement (APP-121 ); Volume E, Chapter E2 of the Environmental Statement (APP-240); Volume F, Chapter F2 of the Environmental Statement (APP-267); Volume G, Chapter G2 of the Environmental Statement (APP-305); and Volume H, Chapter H2 of the Environmental Statement (APP-356).		Agreed	No further action
	Architectural Strategy for the Power Station	Rationale for the scale, height, massing layout, design, exterior materials, colours and finishes of the buildings and structures on the Main Power Station Site	IACC-0003	Design and Access Statement (REP4-017)	Horizon's rationale for the scale, height, massing, layout, design, exterior materials, colours and finishes of the buildings and structures on the main Power Station Site (excluding the Site Campus) is contained in the Design and Access Statements (DAS) (Deadline 4 submission version, REP4-017). The content is not agreed by IACC.	Horizon's rationale for the scale, height, massing, layout, design, exterior materials, colours and finished of the buildings and structures on the main Power Station Site, as set out in the Design and Access Statements (DAS) are appropriate (REP4-017).	Not agreed	No Actions Identified

Topic	Sub topic	Issue	SoCG ID	Document Reference /Signpost/ Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
	Site Preparation and Clearance	Where site preparation and clearance (SPC) operations in the Development Consent Order (DCO) application are also in the Town and County Planning Act 1990 (TCPA) application, the DCO needs to mirror the TCPA application, including a bond, DCO requirements and/or other legal basis, and a restoration scheme in the event that the DCO development does not proceed beyond the SPC phase	IACC-0004	Planning Statement (APP-406)	IACC have resolved to grant a TCPA permission for the site preparation and clearance application and a section 106 is well progressed. The Welsh Government wrote to IACC on 13th 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.	Horizon was seeking a separate permission for SPC works under the TCPA. The draft TCPA permission included conditions requiring a scheme of restoration to return the site to an acceptable condition in the event the Power Station does not proceed. Horizon has also included SPC works within the DCO application (Work No. 12 in the draft DCO – Deadline 5 submission version).	Ongoing	Further discussion required on draft DCO
				Draft Development Consent Order (Deadline 5 submission version)	IACC agrees that a mechanism to switch from the TCPA to the DCO for those works covered by the TCPA is appropriate subject to limitations and safeguards. These limitations would include the need to address the fact that the DCO site preparation and clearance works are larger in physical extent and include elements which are not consented in the TCPA which mean that the approvals for the TCPA are likely to be insufficient to properly control all of the DCO works in all cases without further detail being required.	Following concerns raised by IACC at the Issue Specific hearing on the draft DCO (24 October 2018) Horizon made amendments to the draft DCO and Explanatory Memorandum to provide greater clarity on the interface between the draft DCO and the SPC permission including a new table in the ExM identifying the corresponding conditions and requirements and clearly specifies which will be in force under article 5. Changes have now been made to the draft DCO submitted at Deadline 5 to reflect the withdrawal of the SPC permission.		
				Explanatory Memorandum (APP-031)	The IACC does not accept that the provisions of article 5, in particular that any pre-existing breach of conditions would be unenforceable are appropriate.	The DCO Requirements include obligations for Horizon to prepare a restoration scheme in the event that the DCO does not proceed beyond SPC stage (Requirement SPC13).		
				SPC Planning Permission and Section 106 Agreement Status Note (REP1-008)	IACC does not accept that the draft requirements reflect the TCPA conditions; there are a considerable number of conditions which have no corresponding requirement.	Following the decision not to proceed with the SPC TCPA application, the financial obligations previously in the SPC draft S106 agreement have been transferred to the draft DCO S106 agreement.		
				DCO S106 Agreement	Discussions are continuing on the draft DCO and a revised version was submitted at Deadline 5.			
	Construction	Detailed description of construction phase	IACC-0005	Volume D, Chapter 1 (Construction Method Statement) of the Environmental Statement (APP-136)	This matter is ongoing until the Phasing Strategy is agreed. Also, IACC considers that the level of detail in the stated documents is inadequate.	The detailed description of the construction phase and construction programme associated with the construction methodologies, works and machinery required for constructing the Power Station and main construction works in the Wylfa Newydd Development Area (WNDA) are set out in Volume D, Chapter 1 (Construction Method Statement) of the Environmental Statement (APP-136).	Ongoing	Further discussions required with IACC following review of Phasing Strategy
		Detailed construction programme		Phasing Strategy (REP4-014)		Further detail of the sequence of the delivery of key mitigation is also provided in the Phasing Strategy (REP4-014).  An overarching Code of Construction Practice (CoCP) (Deadline 5 submission version), together with the associated location-specific sub-CoCPs, sets out project-wide and topic-specific environmental requirements, standards and measures in accordance with the mitigation described in the following <ul style="list-style-type: none"><li>Environmental Statement (generally);</li></ul>		

Topic	Sub topic	Issue	SoCG ID	Document Reference /Signpost/ Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
						<ul style="list-style-type: none"><li>Welsh Language Impact Assessment (APP-432);</li><li>Health Impact Assessment Report (APP-429);</li><li>Shadow Habitats Regulations Assessment Report (APP-050);</li><li>Water Framework Directive Compliance Assessment (APP-444); and</li><li>Equality Impact Assessment (APP-434).</li></ul> <p>Sub-CoCPs are also provided for each location and provide additional requirements relevant specifically to that location. The sub-CoCPs that underpin the CoCP are:</p> <ul style="list-style-type: none"><li>Main Power Station Site sub-CoCP (APP-415);</li><li>Marine Works sub-CoCP (APP-416);</li><li>Off-Site Power Station Facilities sub-CoCP (APP-417);</li><li>Park and Ride sub-CoCP (APP-418)</li><li>Logistics Centre sub-CoCP (APP-419); and</li><li>A5025 Off-line Highway Improvements sub-CoCP (APP-420).</li></ul> <p>Updated versions of the CoCPs and sub-CoCPs were submitted by Horizon at Deadline 5.</p> <p>The detail contained within the documents listed above is sufficient.</p>		
		Code of Construction Practice	IACC-0006	See Horizon and IACC Position in the adjacent column	IACC's position is that the level of detail is inadequate	<p>An overarching Code of Construction Practice (CoCP) (Deadline 5 submission version), together with the associated location-specific sub-CoCPs, sets out project-wide and topic-specific environmental requirements, standards and measures in accordance with the mitigation described in the following</p> <ul style="list-style-type: none"><li>Environmental Statement (generally);</li><li>Welsh Language Impact Assessment (APP-432);</li><li>Health Impact Assessment Report (APP-429);</li><li>Shadow Habitats Regulations Assessment Report (APP-050);</li><li>Water Framework Directive Compliance Assessment (APP-444); and</li><li>Equality Impact Assessment (APP-434).</li></ul> <p>Sub-CoCPs are also provided for each location and provide additional requirements relevant specifically to that location. The sub-CoCPs that underpin the CoCP are:</p> <ul style="list-style-type: none"><li>Main Power Station Site sub-CoCP (APP-415);</li><li>Marine Works sub-CoCP (APP-416);</li></ul>	Ongoing	Further discussion required with IACC following review of updated CoCPs

Topic	Sub topic	Issue	SoCG ID	Document Reference /Signpost/ Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
						<ul style="list-style-type: none"><li>Off-Site Power Station Facilities sub-CoCP (APP-417);</li><li>Park and Ride sub-CoCP (APP-418)</li><li>Logistics Centre sub-CoCP (APP-419); and</li><li>A5025 Off-line Highway Improvements sub-CoCP (APP-420).</li></ul> <p>Updated versions of the CoCPs and sub-CoCPs were submitted by Horizon at Deadline 5.</p>		
		Public Access Management Strategy - to identify all current public footpaths, cycle routes and other routes used by walkers, cyclists and equestrians (including definitive, permissive and promoted routes) and to identify those that will be retained, diverted and/or stopped up during the construction phase, a programme of works and the measures to be implemented to ensure the safety of users of these routes	IACC-0007	<p>Volume C Chapter C3 of Environmental Statement (APP-090)</p> <p>Volume D Appendix D4.01 (APP-138)</p> <p>Landscape and Habitat Management Strategy (Reference APP-424)</p> <p>Rights of Way Plans (APP-012)</p> <p>WN CoCP (Deadline 5 submission version)</p>	IACC consider that the Rights of Way plans do not fully or adequately address the main site and that the CoCP is not detailed enough to address this later.	<p>The Rights of Way Plans (APP-012) illustrate Horizon's proposed actions in relation to Public Rights of Way (PRoW) that are to be created, diverted and stopped across all sites. The Rights of Way Plans (APP-012) include 'for approval' plans showing the PRoWs that Horizon intends to create, divert and/or stop during construction. Illustrative plans have also been prepared showing how Horizon intends to manage such PRoWs during operation. The management of these changes to PRoW will be managed through the WN CoCP, Section 6 (Deadline 5 submission version).</p> <p>Horizon does not intend to produce a PRoW Management Plan. . Horizon's position is that the Wylfa Newydd CoCP (Deadline 5 submission version) provides sufficient control about how these PRoWs will be managed. The WN CoCP secures mitigation to reduce as far as practicable adverse effects of permanently closing, temporarily closing or diverting PRoW, in particular on the surrounding PRoW network as well as the environment and local communities. Further mitigation will be secured through the s106 agreement which includes various PRoW contributions that will be applied to improving the PRoW network such as new PRoWs and upgrades to existing PRoW.</p>	Ongoing	Further discussion required with IACC following review of updated CoCPs
		Leisure and recreation	IACC-0008	<p>Volume D, Chapter D4 of Environmental Statement (APP-123)</p> <p>Draft S106 agreement</p> <p>Appendix C of the Planning Statement (APP-406)</p>	<p>IACC requires that the detail of the s106 fund be progressed before detailed comments can be made.</p> <p>IACC does not accept that the leisure recreation facilities proposed for the Site Campus are adequate.</p>	<p>Potential effects of the Project on leisure and recreation have been assessed and are detailed in Chapter C1 Socio-Economics of the Environmental Statement (APP-088), and appropriate embedded and additional mitigation proposed. The current Draft S106 agreement proposes a fund to improve PRoW in close proximity to the WNDA or adjoining the A5025, amongst other things. These contributions, and any associated with upgrades to existing leisure facilities to meet additional demand caused by the workforce, will be secured through the s106 agreement.</p> <p>In relation to the leisure and recreation on the Site Campus, facilities will be provided for workers living in the site campus to keep them entertained, as per the description in [see Appendix</p>	Ongoing	Further discussion required



Topic	Sub topic	Issue	SoCG ID	Document Reference /Signpost/ Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
				Volume D, Chapter 1 of the ES (APP-120)  Volume 3 of the Design and Access Statement (REP4-018)  DCO S106 Agreement		C of the Planning Statement of the Planning Statement (APP-406; Volume D, chapter 1 of the ES (APP-120) and Volume 3 of the Design and Access Statement (REP4-018).		
		Mitigation strategy - to minimise the effects of the construction phase on resources and receptors	IACC-0009	See Horizon and IACC Position in the adjacent column	<p>The ES provides a description of the likely significant effects on the environment arising from the Wylfa Newydd Project. It explains the processes followed, the assessment methods used and the mitigation measures proposed to prevent, reduce and offset any significant adverse effects. Key details of the mitigation strategy can be found in the following principal documents:</p> <ul style="list-style-type: none"><li>ES, Volume J (Environmental Commitments and summary of residual effects) (APP-398 to APP-400); and</li><li>Mitigation Route Map (as updated at Deadline 6).</li></ul> <p>An overarching CoCP (Deadline 5 submission version), together with the associated location-specific sub-CoCPs, also sets out project-wide and topic-specific environmental management requirements, standards and measures in accordance with the mitigation described in the Environmental Statement as well as requirements identified through the other assessment processes undertaken for the Wylfa Newydd Project, such as the Welsh Language Impact Assessment (APP-432); Health Impact Assessment Report (APP-429); Shadow Habitats Regulations Assessment Report (APP-050); Water Framework Directive Compliance Assessment (APP-444); and Equality Impact Assessment (APP-434). Sub-CoCPs are also provided for each location and provide additional requirements relevant specifically to that location. The sub-CoCPs that underpin the CoCP are:</p> <ul style="list-style-type: none"><li>Main Power Station Site sub-CoCP (APP-415);</li><li>Marine Works sub-CoCP (APP-416);</li><li>Off-Site Power Station Facilities sub-CoCP (APP-417);</li><li>Park and Ride sub-CoCP (APP-418)</li><li>Logistics Centre sub-CoCP (APP-419); and</li><li>A5025 Off-line Highway Improvements sub-CoCP (APP-420).</li></ul> <p>Updated versions of the CoCPs and sub-CoCPs were submitted by Horizon at Deadline 5.</p> <p>The CoCP and sub-CoCPs detail the controls that will apply during the construction phase of the Wylfa Newydd DCO Project, including decommissioning of temporary activities.</p> <p>The Phasing Strategy (REP4-014) also describes the relationship between the various components of the Wylfa Newydd DCO Project and secures the delivery of key mitigation needed to offset the effects from the Wylfa Newydd Project.</p> <p>The draft Development Consent Order (Deadline 5 submission version) secures the delivery of all works. Works are to be carried out in accordance with CoCP / sub-CoCP.</p>	Ongoing	Further discussion required	

Topic	Sub topic	Issue	SoCG ID	Document Reference /Signpost/ Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
					This issue has been identified as ongoing as IACC are to review and confirm their position on whether the above documents provide an accurate or adequate description of the proposed mitigation.			
		Monitoring strategy - to monitor the effects of the construction phase on resources and receptors and to put in place measures to remedy any effects that are not in accordance with the ES findings/DCO requirements	IACC-0010	See Horizon and IACC Position in the adjacent column  DCO S106 Agreement	<p>Key areas of monitoring are set out in a subsequent section of this SoCG under ‘Monitoring’.</p> <p>The overarching CoCP (Deadline 5 submission version), together with the associated location-specific sub-CoCPs, sets out project-wide and topic-specific environmental management requirements, standards and measures in accordance with the mitigation described in the ES as well as requirements identified through the other assessment processes undertaken for the Wylfa Newydd Project, such as the following:</p> <ul style="list-style-type: none"><li>• Welsh Language Impact Assessment (APP-432);</li><li>• Health Impact Assessment Report (APP-429);</li><li>• Shadow Habitats Regulations Assessment Report (APP-050);</li><li>• Water Framework Directive Compliance Assessment (APP-444); and</li><li>• Equality Impact Assessment (APP-434).</li></ul> <p>These include an approach to monitoring.</p> <p>The draft DCO S106 agreement also includes and secures the provisions for monitoring.</p> <p>This issue has been identified as ongoing as IACC are to review and confirm their position on whether the above documents provide an accurate description of the proposed approach to monitoring.</p>		Ongoing	Further discussion required
		Compensation strategy - compensatory measures for adverse construction impacts incapable of mitigation	IACC-0011	Mitigation Route Map (REP2-038)  Draft S106 agreement	<p>The Project Visions and Objectives as set out in Chapter 4 of the Planning Statement (APP-406) are agreed to be Horizon’s visions and objectives. IACC’s are set out in the Wylfa SPG (2018).</p> <p>Further discussions are required in relation to the appropriate level of compensatory measures for adverse construction impacts incapable of mitigation.</p>	<p>The Project Visions and Objectives as set out in Chapter 4 of the Planning Statement set out Horizon’s vision for the Wylfa Newydd Project, including the approach to compensation and mitigation.</p> <p>The key mitigation related to adverse impact caused by the project is highlighted through the Mitigation Route Map. This includes embedded and additional mitigation.</p> <p>The Heads of Terms for Planning Obligations sets out any project specific compensation measures that are required to further mitigate any issues that have arisen as a result of the Proposed Development. Refer also to Draft DCO S106 Agreement. As described in these references, financial and non-financial planning obligations are proposed to mitigate the potential effects of the Project.</p>	Ongoing	Further discussion required

Topic	Sub topic	Issue	SoCG ID	Document Reference /Signpost/ Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
		Decommissioning schemes for temporary facilities - detailed decommissioning schemes and outline programmes for the phased removal and restoration of project elements and sites not required beyond the end of the construction phase (including the Site Campus, Dalar Hir Park & Ride, Parc Cybi Logistics Centre and part of the MOLF) and the mitigation of any adverse effects arising	IACC-0012	See Horizon and IACC Position in the adjacent column	<p>The series of controls within the CoCP and sub-CoCP (Deadline 5 submission version) (as listed previously) demonstrate the effective planning, management and controls that will apply to works undertaken during the construction phase of the Wylfa Newydd DCO Project. In respect of temporary Associated Development, this will include their decommissioning.</p> <p>The draft DCO (Deadline 5 submission version) also sets out the requirement for the submission of detailed decommissioning strategies for:</p> <ul style="list-style-type: none"><li>• Park and Ride – Draft DCO requirement PR6 (Park and Ride Facility Decommissioning Strategy);</li><li>• Site Campus – Draft DCO requirement WN23 (Site Campus Decommissioning Strategy);</li><li>• Logistics – Draft DCO requirement LC7 (Logistics Decommissioning Strategy).</li></ul> <p>This issue has been identified as ongoing as IACC are to review and confirm their position on whether the above documents provide an accurate description of the proposed approach to decommissioning.</p>		Ongoing	Further discussion required
	Restoration	Restoration scheme, bond, DCO requirements and/or other legal basis - required in the event that the DCO development is not completed at any stage during the construction phase	IACC-0013	<p>Draft Development Consent Order (APP-029)</p> <p>Draft S106 agreement</p>	<p>IACC consider that the triggers for restoration are inadequate and there is no DCO drafting in place which adequately secures delivery of restoration works and suitable aftercare.</p> <p>The mechanisms of restoration funding are still under discussion.</p>	Horizon does not consider that an obligation for restoration is necessary beyond the SPC phase.	Not Agreed	No further action

Topic	Sub topic	Issue	SoCG ID	Document Reference /Signpost/ Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
		Monitoring - to monitor the effectiveness of the restoration scheme and to put in place measures to remedy any effects that are not in accordance with the scheme	IACC-0014	See Horizon and IACC Position in the adjacent column	<p>The CoCPs are too lacking in detail to effectively manage and control the development and do not secure the claimed mitigation.</p> <p>The IACC does not agree that the DCO (and/or the CoCPs) secures the required monitoring.</p>	<p>Key areas of monitoring are set out in a subsequent section of this SoCG under ‘Monitoring.’</p> <p>The overarching CoCP (Deadline 5 submission version), together with the associated location-specific sub-CoCPs, sets out general and topic-specific environmental requirements, standards and measures in accordance with the mitigation described in the ES as well as requirements identified through the other assessment processes undertaken for the Wylfa Newydd Project, such as the following:</p> <ul style="list-style-type: none"><li>• Welsh Language Impact Assessment (APP-432);</li><li>• Health Impact Assessment Report (APP-429);</li><li>• Shadow Habitats Regulations Assessment Report (APP-050 and APP-051);</li><li>• Water Framework Directive Compliance Assessment (APP-444); and</li><li>• Equality Impact Assessment (APP-434).</li></ul> <p>These include an approach to monitoring.</p> <p>The Draft DCO S106 agreement and the draft DCO (Deadline 5 submission version) also include and secure provisions for monitoring.</p>	Ongoing	Further discussion required
	Landscape and Environmental Management Plan	A detailed Landscaping Scheme and Landscape Habitat Management Plan - to include the masterplan, phases, species lists, construction details, outline programme, outline specification, maintenance and aftercare plans	IACC-0015	<p>Landscape and Habitat Management Strategy (REP2-039)</p> <p>Draft Development Consent Order (Deadline 5 submission version)</p> <p>Wylfa Newydd Development Areas and Power Station Site Plans (APP-014 and APP-015).</p>	<p>The overarching and operational landscape principles are set out in section 4 of the Landscape and Habitat Management Strategy (REP2-039) and the parameter plans (APP-014 and APP-015).</p> <p>The draft DCO (Deadline 5 submission version) includes, at WN9, the requirement to submit a final landscape scheme for the WNDA during the operational phase and that this must be prepared in accordance with the overarching and operational landscape principles set out in Section 4 of the Landscape and Habitat Management Strategy (REP2-039) and the parameters identified in WN4.</p> <p>This issue has been identified as ongoing as IACC are to review and confirm their position on whether the above documents provide an accurate or adequate description of the proposed approach to landscape and environmental management.</p>		Ongoing	Further discussion required



Topic	Sub topic	Issue	SoCG ID	Document Reference /Signpost/ Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
		Monitoring - to monitor the effectiveness of the Landscaping Scheme and to put in place measures to remedy any effects that are not in accordance with the Landscaping Scheme	IACC-0016	Landscape and Habitat Management Strategy (LHMS) (REP2-039)	<p>IACC does not agree that the approach taken by Horizon is adequate.</p> <p>The LHMS is high level and vague, does not secure delivery or maintenance or aftercare and does not set out a meaningful framework for detailed proposals to be brought forward which can be assessed at this time by specialists.</p> <p>The triggers for the bringing forward of detailed proposals are all too late and too weak and do not secure delivery.</p>	The draft DCO includes a requirement (WN9) to produce a Landscape and Habitat Scheme, which would be submitted to the IACC. The LHMS (REP2-039) currently states that the management regimes will be regularly reviewed. In specific locations, management schemes for specific areas will be submitted to the determining authority (IACC) following grant of the DCO alongside the detailed design for that area. Management schemes will be developed in accordance with the principles in the LHMS which seeks to secure the establishment and long term viability of these landscapes and habitats. These management schemes will provide details of any monitoring and reporting requirements.	Ongoing	Further discussion required
	Footpaths, Cycleways and Equestrian routes within the WNDA	Public Access Management Strategy - to identify the public footpaths, cycle routes and other routes to be used by walkers, cyclists and equestrians (including definitive, permissive and promoted routes) within the WNDA to be established and maintained for the duration of the operational phase, with a programme of works and outline construction details for these routes	IACC-0017	See referencing at IACC-0016	<p>Horizon's public access management strategy may well be based on the CoCPs however they are lacking in meaningful detail and inadequate.</p> <p>IACC has not been provided with the necessary detail to assess the public access impacts in and around the main site; the mitigation proposed is unspecified and not secured.</p>	<p>Section 6 of the Overarching CoCP (Deadline 5 submission version) states that Horizon's public access management is based on the controls set out in the CoCP and relevant sub-CoCPs. Horizon will put in place mitigation to reduce as far as practicable adverse effects of permanently closing, temporarily closing or diverting PRow in particular on the surrounding PRow network as well as the environment and local communities.</p> <p>Any site specific mitigation requirements to be implemented for public access are described in section 6 of the relevant sub-CoCPs. Further mitigation will be secured through the s106 agreement which includes various PRow contributions that will be applied to improving the PRow network such as new PRow's and upgrades to existing PRow.</p> <p>The CoCPs were updated at Deadline 5 to address these concerns.</p>	Ongoing	Further discussion required
	Enhancement	Details of all environmental enhancement measures proposed	IACC-0018	Volume J, Chapters J1 and J2 of Environmental Statement (: APP-398 to APP-400)	<p>IACC has not carried out a line by line review of the ES to ensure that all mitigation is listed in the route map.</p> <p>IACC notes that the primary means of securing delivery in that map is the CoCPs which lack the necessary detail to deliver the claimed mitigation.</p>	<p>All environmental measures and commitments are in Volume J, Chapters J1 and J2 of ES (s: APP-398 to APP-400), with all mitigation measures provided in the Mitigation Route Map (REP2-038).</p> <p>The CoCPs were updated at Deadline 5 to address these concerns.</p>	Ongoing	Further discussion required

Topic	Sub topic	Issue	SoCG ID	Document Reference /Signpost/ Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
				Mitigation Route Map (REP2-038)  Landscape and Habitat Management Strategy (REP2-039)  Wylfa Newydd CoCP (Deadline 5 submission version)				
	Operation	Detailed description of operational phase	IACC-0019	Volume D of the Environmental Statement (APP-120)	IACC has requested further detail on the detailed description of the operational phase.  IACC notes that it cannot locate for example a meaningful assessment of the scope of maintenance works for which consent is sought.	A detailed description of the operational phase of the Power Station, as assessed in the ES, can be found in Volume D of the ES(APP-120)	Ongoing	Further discussion required
		Code of Operational Practice	IACC-0020	WN CoOP (APP-421)  Park and Ride sub-CoCP (APP-418)  Logistics Centre sub-CoCP (APP-419)  A5025 Off-line Highway Improvements sub-CoCP (APP-420)	The CoOP (APP-421) sets out the general and topic specific environmental management requirements for the operation of the Wylfa Newydd Power Station in accordance with the mitigation described in the ES and other application documents that demonstrates the effective planning, management and control of the Power Station.  The CoOP does not cover the following: <ul style="list-style-type: none"><li>The Park and Ride facility at Dalar Hir, which will be decommissioned after construction of the Power Station. The site will be restored and maintained by Horizon for a defined period until responsibility of managing the area is taken over by the land-owner in accordance with a Handover Environmental Management Plan agreed with the Isle of Anglesey County Council (IACC). The operational environmental management arrangements for the Park and Ride facility are within the scope of the Park &amp; Ride sub-CoCP (APP-419);</li><li>The Logistics Centre at Parc Cybi, which will be partly decommissioned after construction of the Power Station, suitable for some future use of the site. The operational environmental management arrangements for the Logistics Centre are within the scope of the Logistics Centre sub-CoCP (APP-419); and</li><li>The A5025 Off-line Highway Improvements, which will be in place before the Power Station is operational. Site landscape maintenance associated with the A5025 Highway Improvements will be subject to a Handover Environmental Management Plan, to be agreed with the IACC. The IACC will act as the Local Highway Authority responsible for the management of the road after its construction (APP-420).</li></ul> This issue has been identified as ongoing as IACC are to review and confirm their position on whether the above documents provide an accurate or adequate description of the proposed approach to management during operation.		Ongoing	Further discussion required

Topic	Sub topic	Issue	SoCG ID	Document Reference /Signpost/ Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
		Compensation strategy - compensatory measures for adverse operational impacts incapable of mitigation	IACC-0022	Mitigation Route Map (REP2-038)  Draft S106 agreement	IACC has requested further detail on the compensatory measures for adverse operational impacts incapable of mitigation.  Horizon uses the term key mitigation to mean delivery of various elements of the project including the MOLF and site campus, delivery of these is supposed to be controlled by the phasing strategy which is inadequate.	The key mitigation related to adverse impact caused by the project is highlighted through the Mitigation Route Map. The Draft Heads of Term, and the Draft DCO S106 Agreement, set out the planning obligations proposed to mitigate the potential adverse impacts of the project and any project specific compensation measures that are required for any issues that have arisen as a result of the Proposed Development.	Ongoing	Further discussion required
		Monitoring - to monitor the effects of the operational phase and to put in place measures to remedy any effects that are not in accordance with the DCO	IACC-0023	CoOP (APP-421)  Mitigation Route Map (REP2-038)	IACC has requested further detail on the monitoring of the effects of the operational phase.  The CoOP is too lacking in detail to effectively manage and control the development and does not secured the claimed mitigation.	The CoOP (APP-421) and Mitigation Route Map (REP2-038) set out the general and topic specific environmental monitoring requirements for the operation of the Wylfa Newydd Power Station in accordance with the mitigation described in the ES and other application documents that demonstrates the effective planning, management and control of the Power Station.	Ongoing	Further discussion required
	Climate Change Resilience	Measures incorporated into the design of the development to enable it to adapt to the effects of climate change, any consequential effects on the surrounding area and measures to mitigate these effects	IACC-0024	Planning Statement (APP-406)  Carbon and Energy Report (APP-423)	IACC has requested further detail on the measures incorporated into the design of the development to enable it to adapt to the effects of climate change, any consequential effects on the surrounding area and measures to mitigate these effects.  Not agreed. IACC has provided detailed comments on planning policy in its Local Impact Report.	Planning Statement (APP-406) and Carbon and Energy Report (APP-423) demonstrates that Horizon is in compliance with policy.  Further information can be found in Horizon's response to FWQ Q3.0.1.	Not agreed	No further action
	Legacy benefits	The significant positive long-term benefits for Anglesey, its communities, culture, landscapes, heritage assets, biodiversity, etc, enhancing the sustainability, wellbeing and vibrancy of the Island	IACC-0025	Volume C Chapter C6 and Chapter C7 of the Environmental Statement (: APP-088 and APP-094)  Planning Statement (APP-406)	The extent of legacy benefits of the Wylfa Newydd Project are not agreed.  IACC has provided its view on this point in various submissions and does not consider it appropriate to seek to include this point in a SoCG given that it is fundamental to the consideration of the panel and the determination by the Secretary of State.	Whilst the Wylfa Newydd DCO Project will, in common with any national infrastructure project, result in some adverse effects to the environment and local community these (considered individually or collectively) do not outweigh the important benefits of delivery of the Project. These benefits would be delivered for the UK as a whole, including a vital role in the provision of safe and secure low carbon electricity, as well as significant local benefits including jobs creation, investment in the local economy and provision of skills for the local workforce. Together these benefits have the potential to create a significant lasting positive legacy for Anglesey, north Wales and the UK. Further information on the benefits of the Project can be found in the Planning Statement (APP-406) and the Written Representation of Horizon Nuclear Power (REP2-003).	Not agreed	No further action

Topic	Sub topic	Issue	SoCG ID	Document Reference /Signpost/ Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
	Decommissioning	Outline description of the decommissioning phases - to be implemented at the end of the operational lives of each element of the development	IACC-0026	Appendix D, Chapter D1 of the Environmental Statement (APP-120)	<p>Details of the decommissioning of the Power Station are not known at this time. Further information is however set out in Appendix D, Chapter D1 of the Environmental Statement (APP-120). The decommissioning of a nuclear power station is subject to international and national guidance and regulation. No single guidance document prescribes a set process. However, there is a consensus that decommissioning should be undertaken as early as possible, supported by a requirement for planned delays or deferral periods to be robustly justified. Before decommissioning starts, Horizon would need to obtain consent from the Office for Nuclear Regulation and undertake a separate EIA under the Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations 1999. This would require a period of consultation relating to the submission of a decommissioning proposal and supporting Environmental Statement. Horizon expects that this process would begin in the final few years prior to generation ceasing, so that the specific environmental characteristics of the environmental baseline could be fully evaluated and understood.</p> <p>The draft DCO, at PW10, also sets the need for the submission of a ‘Wylfa Newydd Decommissioning Strategy’.</p> <p>In relation to other elements of the project:</p> <ul style="list-style-type: none"><li>The Park and Ride facility at Dalar Hir will be decommissioned after construction of the Power Station. The site will be restored and maintained by Horizon for a defined period until responsibility of managing the area is taken over by the land-owner in accordance with a Handover Environmental Management Plan agreed with the Isle of Anglesey County Council (IACC). The operational environmental management arrangements for the Park and Ride facility are within the scope of the Park &amp; Ride sub-CoCP (APP-418); and</li><li>The Logistics Centre at Parc Cybi will be partly decommissioned after construction of the Power Station, suitable for some future use of the site. The operational environmental management arrangements for the Logistics Centre are within the scope of the Logistics Centre sub-CoCP (APP-419).</li><li>Site Campus accommodation and amenity buildings will be designed to provide scalability and to allow its construction and decommissioning in phases. Following completion of the construction of the Power Station, the Site Campus would be decommissioned and returned to its pre-developed condition. Public footpaths and access to Fisherman’s car park would be reinstated after decommissioning.</li></ul> <p>This issue has been identified as ongoing as IACC are to review and confirm their position on whether the above documents provide an accurate or adequate description of the proposed approach to decommissioning.</p>		Ongoing	Further discussion required
				Draft Development Consent Order (Requirement PW12) (APP-029)				
				Park & Ride sub-CoCP (APP-418)				
				Logistics Centre sub-CoCP (APP-419)				
				A5025 Off-line Highway Improvements sub-CoCP (APP-420)				
				Design and Access Statement - Volume 3 - Associated Developments and Off-Site Power Station Facilities (REP4-016)				
					<p>The A5025 Off-line Highway Improvements will be in place before the Power Station is operational. Site landscape maintenance associated with the A5025 Highway Improvements will be subject to a Handover Environmental Management Plan, to be agreed with the IACC. The IACC will act as the Local Highway Authority responsible for the management of the road after its construction.</p>		Ongoing	Further discussion required

Page 24



Topic	Sub topic	Issue	SoCG ID	Document Reference/ Signpost/ Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
PLANNING POLICY								
Planning Policy	N/A	National Policy Statement	IACC 0027	<div>National Policy Statement for Energy (EN-1)</div> <div>National Policy Statement for Nuclear Generation (EN-6)</div> <div>Chapter 5 of the Planning Statement (APP-406)</div> <div>Written Ministerial Statement December 2017</div>	<p>Both parties agree that the Overarching National Policy Statement for Energy (EN-1) and National Policy Statement for Nuclear Power Generation (EN-6) are the National Policy Statements relevant to the Wylfa Newydd DCO Project.</p> <p>Both parties also agree that Wylfa Newydd is recognised as a potentially suitable site for the deployment of a new nuclear power station in paragraph 4.1.1 of National Policy Statement EN-6. The Written Ministerial Statement (dated December 2017) clarifies that sites listed in EN-6 on which a new nuclear power station is anticipated to deploy after 2025 will continue to be considered to be appropriate sites and retain strong Government support during the designation of the new National Policy Statement. It is therefore agreed that the need for a new nuclear power station on the Wylfa Newydd site is established and that this does not fall to be considered by the examining authority</p> <p>Horizon have set out the planning framework for the Project in chapter 5 of the Planning Statement (APP-406) and IACC will set out the relevant local policy considerations in the Local Impact Report (LIR).</p>		Agreed	No further action required
	N/A	Relationship between National Policy Statement and Development Plan	IACC 0028	Chapter 6 of the Planning Statement (APP-406)	It is agreed that National Policy Statements EN-1 and EN-6 form the primary basis for decision making for the Wylfa Newydd DCO Project and that in the event of a conflict between these and local and regional policy, the National Policy Statements prevail for the purposes of decision making (paragraph 4.5.1 of the NPS EN-1), in so much as the NPS's are to be had regard to, under Section 105 (2) c of the Planning Act and the Written Ministerial Statement (dated December 2017).		Agreed	No further action required
	N/A	National, Regional and Local Planning Policy	IACC 0029	Chapter 5 of the Planning Statement (APP-406)	The adopted key national, regional and local planning policy documents relevant to the Wylfa Newydd DCO Project as set out, and identified, in Chapter 5 and Appendix G (Needs case for the proposed nuclear power plant at Wylfa Newydd) of the Planning Statement (APP-406) are agreed.		Agreed	No further action required
	N/A	Weight to be given to planning policy	IACC 0030	Chapter 6 of the Planning Statement (APP-406)	National Policy Statement EN-1 and National Policy Statement EN-6 represent the primary basis for decision making for both the NSIP and the Associated Developments. This does not change for sites due to be deployed after 2025, as confirmed in the Written Ministerial Statement of December 2017. The statement also clarifies that the content of EN-1 and EN-6 is an important and relevant matter in the context of decisions by the Secretary of State under section 105 of the Planning Act 2008 and, where there is no relevant change in circumstances, this policy will be likely to carry significant weight. Paragraph 4.1.4 of National Policy Statement EN-1 states that the decision maker should take into account “environmental, social and economic benefits and adverse impacts, at national, regional and local levels” and that these may be identified in National Policy Statement EN-1, in the application or elsewhere (including in local impact reports). Other matters which the decision maker may consider both “important and relevant” to its decision making include local planning policy (paragraph 4.1.5 of National Policy Statement EN-1). However, where there is a conflict with a National Policy Statement, the National Policy Statement prevails for the purposes of decision making given the national significance of the infrastructure. Paragraph 2.2.4 of National Policy Statement EN-1 recognises the role of the planning system to provide a framework which permits the types of infrastructure needed, where it is acceptable in planning terms. It sets out the importance of the planning system in ensuring that development consent decisions take into account views of the affected communities and respect the principles of sustainable development.		Agreed	No further action required

Topic	Sub topic	Issue	SoCG ID	Document Reference/ Signpost/ Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
NEED								
Need	N/A	National Policy Statement	IACC 0031	<div>National Policy Statement for Energy (EN-1)</div> <div>National Policy Statement for Nuclear Generation (EN-6)</div> <div>Chapter 5 of the Planning Statement (APP-406)</div> <div>Written Ministerial Statement December 2017</div>	<p>Both parties agree that the Overarching National Policy Statement for Energy (EN-1) and National Policy Statement for Nuclear Power Generation (EN-6) are the National Policy Statements relevant to the Wylfa Newydd DCO Project.</p> <p>Both parties also agree that Wylfa Newydd is recognised as a potentially suitable site for the deployment of a new nuclear power station in paragraph 4.1.1 of National Policy Statement EN-6. The Written Ministerial Statement (dated December 2017) clarifies that sites listed in EN-6 on which a new nuclear power station is anticipated to deploy after 2025 will continue to be considered to be appropriate sites and retain strong Government support during the designation of the new National Policy Statement. It is therefore agreed that the need for a new nuclear power station on the Wylfa Newydd site is established and that this does not fall to be considered by the examining authority.</p>		Agreed	No further action
	N/A	Need for new energy generating infrastructure, including nuclear	IACC 0032	<div>National Policy Statement for Energy (EN-1)</div> <div>National Policy Statement for Nuclear Generation (EN-6)</div> <div>Chapter 5 and Appendix G of the Planning Statement (APP-406)</div>	<p>Part 3 of EN-1 defines and sets out the need that exists for nationally significant energy infrastructure, including new nuclear power stations. Paragraph 3.1.1 states that the UK needs all the types of energy infrastructure covered by the NPS in order to achieve energy security at the same time as dramatically reducing greenhouse gas emissions. Paragraph 3.1.2 goes on to state that it is for industry to propose new energy infrastructure and that the Government does not consider it appropriate for planning policy to set targets for or limits on different technologies.</p> <p>Notably, paragraph 3.1.3 of EN-1 stresses that the SoS should assess applications for development consent for the types of infrastructure covered by the energy NPSs; “...on the basis that the Government has demonstrated that there is a need for those types of infrastructure and that the scale and urgency of that need...” is as described for each of them. Paragraph 3.1.4 continues that the SoS should give substantial weight to the contribution that all projects would make toward satisfying this need when considering applications under the 2008 Act. As such, EN-1 is clear that the need that exists for new energy infrastructure is not open to debate.</p> <p>The urgency of the need for new electricity generating capacity is underlined by projections within EN-1 that indicate up to 22 gigawatts (‘GW’) of existing capacity will close over the period to 2020 in part due to the Industrial Emissions Direction but also as a result of some power station reaching the end of their operational lives (paragraph 3.3.7). In response to this, EN-1 identifies a minimum need for 59 GW of new generating capacity over the period to 2025 (paragraph 3.3.23).</p> <p>Section 202 of EN-6 deals specifically with the need for new nuclear power stations. Paragraph 2.2.3 states that a failure to develop new nuclear power stations significantly earlier than the end of 2025 would increase the risk of the UK being locked into a higher carbon energy mix for a longer period of time than is consistent with the Government’s ambitions to decarbonise electricity supply. As a result, it would become more difficult and expensive to meet the Government’s targets for significant and urgent decarbonisation of the economy and enhanced security of supply (see Part 3 of EN-1).</p> <p>It is agreed that there is a significant and established need for the Project.</p>		Agreed	No further action

Topic	Sub topic	Issue	SoCG ID	Document Reference/ Signpost/ Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
	N/A	Need for the Associated Development – Temporary Workers' Accommodation (TWA)	IACC 0033	Workforce Accommodati on Strategy (APP-412)	The principles described by Horizon are agreed but not the figures or the locational considerations referred to.	<p>TWA comprises purpose built accommodation for construction workers. The key driver of demand for TWA is the number of workers at the peak of construction; many of which (especially specialist workers) may not be local and will require temporary accommodation. For assessment purposes the ES has assumed 9,000 construction workers at peak. Based on a peak of 2,000 home based workers, the project will need up to 7,000 bed spaces from Non-Home Based (NHB) workers. The project will accommodate these through:</p> <ul style="list-style-type: none"><li>4,000 bed spaces on the Site Campus (purpose built Temporary Workers Accommodation on-site); and</li><li>The use of 3,000 bed spaces in existing accommodation across Anglesey and parts of the mainland.</li></ul> <p>The site selection process was carried out on the basis of requiring up to 4,000 bed spaces. Further information on the way in which Horizon has calculated the need for TWA is set out in the Workforce Accommodation Strategy (Examination Reference Number: APP-412).</p> <p>The need for up to 4,000 is justified and accurate.</p>	Ongoing	Further discussions required
	N/A	Need for the Associated Development – Park and Ride Facility	IACC 0034	Transport Assessment (APP-101)  Integrated Traffic and Transport Strategy (APP-107)	IACC notes the references to Park and Ride provision but does not accept that what is presently offered is adequate to meet all potential demand.	<p>The Park and Ride facility is classed as ‘Associated Development’ for the purposes of the DCO application.</p> <p>The Integrated Traffic and Transport Strategy (ITTS) (APP-107) sets out Horizon's proposals for transporting construction workers and materials to the Power Station site and plans for improvements to the local road network. A key component of the ITTS is the provision of a Park and Ride facility as part of an integrated package of improvements for the transportation of construction workers. The facility is intended to reduce the number of vehicles using minor roads and control the number using the A5025.</p> <p>Based on further assessment and modelling undertaken following the Stage Two Pre-Application Consultation (PAC2), Horizon has identified a requirement for a Park and Ride facility to accommodate up to 1,900 cars.</p> <p>Traffic modelling has demonstrated a Park and Ride facility on the mainland is not required for the Wylfa Newydd Project. It follows that only sites on Anglesey have been considered for the facility.</p> <p>It is acknowledged that consultees, including the Welsh Government, have previously stated that a facility on mainland should be considered. However, it has been determined that a mainland site would only be required in a scenario where there are capacity issues elsewhere on the road network (for example, on the Britannia Bridge). The aforementioned</p>	Ongoing	Further discussions required

Topic	Sub topic	Issue	SoCG ID	Document Reference/ Signpost/ Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
						<p>transport modelling has determined there are no capacity or highway safety reason why a Park and Ride facility would be required on the mainland, in addition to or instead of on Anglesey.</p> <p>The need for a single park and ride facility to accommodate up to 1,900 cars located on the Isle of Anglesey is accurate and justifiable. Further information is provided in the Transport Assessment (Application Reference Number: APP-101) and ITTS ( APP-107).</p>		
	N/A	Need for the Associated Development – Logistics Centre	IACC 0035	<p>Transport Assessment (APP-101)</p> <p>Integrated Traffic and Transport Strategy ( APP-107)</p>	IACC notes the references to Logistics Centre provision but does not accept that what is presently offered is adequate to meet all potential demand.	<p>The Logistics Centre is classed as ‘Associated Development’ for the purposes of the DCO application.</p> <p>A key component of the ITTS for the Wylfa Newydd DCO Project (APP-107) is to reduce heavy goods vehicle (HGV) movements on the A5025 and to manage the controlled flow of vehicles to the Power Station site. This is explained further in the Transport Assessment (APP-101).</p> <p>A single Logistics Centre is required to manage the road-based freight serving the Power Station site during the construction phase. The facility will control the timing of onward transport to the Power Station site along the A5025, in order to manage potential congestion. This is particularly necessary at peak periods or in the event of an incident.</p> <p>The other main component of the ITTS concerned with the movement of materials during the construction phrase is the Marine Off-Loading Facility (MOLF), which will enable the delivery of construction materials by sea; reducing HGV trips on the road network.</p> <p>It is important that the Logistics Centre is located in close proximity to the strategic road network, but also where it can act as a holding facility for any goods coming to the site from sources other than the MOLF, such as the Port of Holyhead.</p> <p>The facility will provide a stopping point for HGVs and will include a covered inspection bay. The minimum site size for the Logistics Centre is 3 hectares (ha) which is necessary in order to accommodate the following requirements:</p> <ul style="list-style-type: none"><li>• up to 100 HGVs on-site at any one time;</li><li>• 10 staff parking spaces (including disabled);</li><li>• welfare/security building and kiosks, covered inspection bay,</li><li>• laydown/storage areas and vehicle scanning equipment; and</li></ul>	Ongoing	Further discussions required



Topic	Sub topic	Issue	SoCG ID	Document Reference/ Signpost/ Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
						<ul style="list-style-type: none"><li>security features, including paladin fencing with controlled access barriers and systems, CCTV and lighting.</li></ul> <p>The need for a single Logistics Centre covering an area no smaller than 3 ha located on the Isle of Anglesey is accurate and justifiable.</p>		
	N/A	Need for the Off-Site Power Station Facilities	IACC 0036	Site Selection Report – Volume 3 – Off-Site Power Station Facilities (APP-438).	<p>The Wylfa Newydd Off-Site Power Station Facilities comprise an Alternative Emergency Control Centre (AECC), an Environmental Survey Laboratory (ESL) and a Mobile Emergency Equipment Garage (MEEG).</p> <p>In accordance with UK regulatory requirements, Horizon is developing plans for operational and emergency preparedness. It will be a requirement of the Nuclear Site Licence issued by the ONR that Horizon has adequate facilities to respond to an emergency prior to bringing fuel to the Power Station Site. This plan will include a phased approach to emergency response, identifying actions to be taken at the Power Station Site, in the local communities, across the region and then across the UK.</p> <p>As part of its emergency planning arrangements, Horizon needs to develop integral facilities that will be physically separate from, but local to, the Power Station Site (the Off-Site Power Station Facilities). The Off-Site Power Station Facilities are required in order to provide resilience against extreme events with very low probabilities, such as, for example, severe flooding, earthquake(s) or an integral part of Horizon’s emergency arrangements at the Power Station. The facilities therefore form a significant part of the safety case for the Power Station.</p> <p>The positioning of the Off-Site Power Station Facilities must meet certain locational criteria which are based on Horizon’s interpretation of the currently available technical data for UK ABWR [RD2] and are outlined below:</p> <ul style="list-style-type: none"><li>located at a point immediately adjacent to and which provide straightforward access to the main road network (A5025, A55, A5);</li><li>located outside the prevailing wind zone of the Power Station;</li><li>located in a zone of low seismic activity; and</li><li>located in a radius between 1.5 kilometre (km) and 7.5km from the Power Station Site.</li></ul> <p>The site selection process for the facilities was very important, as they must able be resilient in extreme events and able to operate in an emergency scenario.</p> <p>The need for the Off-Site Power Station Facilities is agreed as set out in Site Selection Report – Volume 3 – Off-Site Power Station Facilities (APP-438).</p>	Agreed	No further action	
	N/A	Need for the Associated Development – A5025 Off-Line Highways Improvements	IACC 0037	Site Selection Report – Volume 7 – A5025 Off-Line Highways Improvement s (APP-442).	<p>The Off-line Highway Improvements comprise new sections of road along the A5025 between Valley and the Power Station Site (the A5025 route corridor) to improve access and safety.</p> <p>The need for the A5025 Offline improvements is agreed.</p>		Agreed	No further action

Topic	Sub topic	Issue	SoCG ID	Document Reference /Signpost/ Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
MONITORING								
Monitoring	Overview	Ongoing monitoring of the effects of the Wylfa Newydd Project	IACC0038	Draft DCO S106 agreement	<p>Following comments from IACC throughout the examination, Horizon is now proposing a comprehensive approach to monitoring the effects of the Wylfa Newydd DCO Project, which is agreed.</p> <p>Monitoring is secured for each relevant topic through the draft DCO S106 agreement, supported by a series of topic-based Engagement Groups, as appropriate.</p> <p>The draft DCO S106 agreement recognises where it is appropriate for monitoring to be carried out by IACC, Welsh Government or other third parties, as well as monitoring the direct effects of the Wylfa Newydd Project by Horizon.</p> <p>The table below sets out the approach to monitoring the effects of the Wylfa Newydd Project for each relevant topic area, together with confirmation of whether this is agreed between parties, or subject to ongoing discussion through the draft DCO S106 agreement.</p>		Agreed	IACC has confirmed that this issue is agreed, subject to detailed drafting in the S106 agreement
Monitoring		Ongoing monitoring of the IACC's annual Welsh Language Plan	IACC0039	Wylfa Newydd CoCP (Deadline 5 version)  Draft DCO S106 agreement	<p>Horizon is proposing a holistic approach to monitoring the impacts of the Welsh Newydd Project. The draft DCO S106 agreement secures a Welsh Language and Culture Engagement Group, of which IACC is part, to monitor the implementation of the Welsh language and culture obligations in the draft DCO S106 agreement.</p> <p>Engagement Group would consider monitoring reports from IACC as well as Horizon and other relevant organisations and feed back to IACC and Horizon on issues arising from such monitoring.</p> <p>The draft S106 agreement also commits the developer to an annual evaluation of the impact of the Wylfa Newydd DCO Project on Welsh language in the KSA, up to 5 years from the start of the operational period.</p>		Agreed	IACC has confirmed that this issue is agreed, subject to detailed drafting in the S106 agreement
		Monitoring the level of dependents of construction workers moving to the area and the schools they attend	IACC0040	Volumes B of WLIA and WL&CMES - Appendix I4 (APP-432 and 433)	<p>The draft DCO S106 agreement obligates Horizon to collect aggregate and anonymised data on workforce dependants, including on locations where they are living, their Welsh language skills and the number of children and their ages. This is sufficient to monitor the level of dependents of construction workers moving to the area and the schools they attend. Further information is provided in the Welsh Language and Culture section of this SoCG0084).</p>		Agreed	No further action
		Workforce Accommodation Strategy	IACC0041	Workforce Accommodation Strategy (APP-412)	Further detail is required on the approach to the Workforce Accommodation Strategy (WAS) and how it will be used for monitoring and how this will help to direct construction workers to areas where effects on the Welsh Language and Culture could be reduced, or benefits enhanced.	<p>This matter will be managed through the Worker Accommodation Management Service (WAMS), rather than the WAS. The WAMS will:</p> <ul style="list-style-type: none"><li>Maintain a database of suitable properties offered by landlords and providers, including Horizon's own TWA.</li><li>Provide a means for workers to search for housing that meets their needs and be put in contact with the property owners or their agents.</li><li>Capture and record data about the choices of workers, and provide reports on this data to be used for management purposes.</li></ul> <p>The information that is captured by the WAMS can be used to inform other assessments which may identify the need for additional mitigation for example of schools or other public services.</p> <p>It will also mean collecting monitoring data and reporting on it to stakeholders and using that data to help guide workers' choices and achieve better outcomes for local communities.</p> <p>Terms of reference of the WAMS will be annexed to the s.106 and will be discussed and agreed with IACC.</p>	Ongoing	Further discussions between Horizon and IACC required on WAMS terms of reference to be attached to the S106 agreement
	Welsh Language and Culture							

Topic	Sub topic	Issue	SoCG ID	Document Reference /Signpost/ Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
						Linguistic capabilities will be one consideration in terms of the number of workers that may be appropriate for any particular area. Other considerations could include level and type of accommodation and community impact. The WAMS Oversight Board (secured by the S106 agreement) will need to review and balance these considerations when deciding what actions need to be taken.		
				WL&CMES - Appendix I4 (APP-432 and 433)  Draft DCO S106 agreement	There is insufficient detail in the WL&CMES on the monitoring of each individual measure, and in particular, in relation to costs, delivery mechanism and timescales	Measure 22 states that Horizon will establish an external stakeholder group (Welsh Language and Culture Engagement Group) to monitor the implementation of the Strategy and provide advice on its delivery. This measure highlights the important of external monitoring and oversight. The group's role will broadly be to review progress against each of the measures in the Strategy (as secured in the draft DCO S106 agreement) and advise on measures required to overcome any difficulties. Horizon is obliged to appoint a Welsh Language and Culture Coordinator prior to implementation who will ensure the delivery of the WL&CMES, as secured by the s.106 agreement.  Schedule 1 clause 9.2 of the draft DCO S106 (shared with IACC and Welsh Government on 23.01.19) provides a commitment that Horizon, prior to implementation of the Wylfa Newydd DCO Project, will agree parameters for an annual evaluation of the impact of the Wylfa Newydd DCO Project on the Welsh language in the KSA. Horizon will thereafter undertake that annual evaluation in accordance with the approved parameters for the duration of the construction phase up to five years from the start of the operational period.	Ongoing	Further discussions between Horizon and IACC required  Horizon's view is that IACC's outstanding concerns are addressed by the draft S106 agreement, but this has not been confirmed by IACC
		Monitoring of workers	IACC0042	Volumes B of WLIA and WL&CMES - Appendix I4 (APP-432 and 433)  Workforce Accommodation Strategy (APP-412)	IACC consider that there should be a continuous monitoring of workers, including the development patterns of where they choose to live and dependents.	Horizon agrees that monitoring is appropriate, but that this should be proportionate.  The Workforce Accommodation Strategy (APP-412) states at paragraph 9.2.5:  "It will also mean collecting monitoring data and reporting on it to stakeholders and using that data to help guide workers' choices and achieve better outcomes for local communities. Monitoring will also help inform and target mitigation measures, for example those aimed at the Welsh language and culture."  The draft S106 agreement which has been shared with IACC includes a clause which requires Horizon to provide quarterly monitoring reports in relation to workers choices including the location and type of accommodation.	Ongoing	Further discussions between Horizon and IACC required  Horizon's view is that IACC's outstanding concerns are addressed by the draft S106 agreement, but this has not been confirmed by IACC

Topic	Sub topic	Issue	SoCG ID	Document Reference /Signpost/ Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
		Data collection	IACC0043	Welsh Language Impact Assessment and WL&CMES - Appendix I4 (APP 432 and 433)  Jobs and Skills Strategy (APP-411)  Draft DCO S106 agreement	IACC previously stated that whilst Horizon commits to data collection on families moving into the area, no such commitment is made to collect data on the language skills of its workforce and to update this data periodically.  Measure 12 of the WL&CMES (APP 432 and 433) now states that Horizon will collect data on the Welsh language skills of its own workforce and update this on an annual basis. Horizon will encourage staff to take up Welsh language training opportunities.  The revised draft S106 agreement requires Horizon to monitor the Welsh Language skills of Workforce Dependants.		Agreed	No further action
	Economic Development and Supply Chain	Supply Chain Action Plan/Portal	IACC0044	Wylfa Newydd CoCP (Deadline 5 version)  Draft DCO S106 agreement submitted at Deadline 5 (12 February 2019)	Horizon will operate and maintain a Supply Chain Portal in accordance with a Supply Chain Action Plan (both of which are secured by the S106) and will monitor the effectiveness of this Portal and report on its findings to the Council on a quarterly basis.  Horizon has committed to develop the Supply Chain Action Plan in consultation with the Welsh Government and ensure that it is in place prior to implementation and therefore complied with.  The SCAP will establish annual key performance indicators and monitoring and reporting protocols on key performance indicators (KPIs).		Agreed	IACC has confirmed that this issue is agreed, subject to detailed drafting in the S106 agreement
		Monitoring approach	IACC0045	Volume C Chapter C1 of the Environmental Statement (APP-088)  Draft DCO S106 agreement	It has been agreed that this monitoring could consider review against Key Performance Indicators to be agreed through the Supply Chain sub-group. This approach is set out in the draft terms of reference for the WNMPOP which have been shared with IACC. See above with regard to KPIs		Agreed	IACC has confirmed that this issue is agreed, subject to detailed drafting in the S106 agreement
	Tourism	Tourism Fund	IACC0046	Draft DCO S106 agreement	Horizon has shared a revised draft S106 with IACC which amends the Tourism Fund, to increase the committed spend and remove the contingency aspect.  Horizon acknowledge that there is a risk of a project of this scale impacting on the brand of the island, but there is currently not agreement on the scale of this impact and therefore the level and adequacy of mitigation available. However, Horizon considers that the Tourism Fund, as offered in the draft DCO S106 agreement is appropriate and reasonable.  Notwithstanding this, Horizon notes the importance of the tourism sector to Anglesey and is proposing that part of the Tourism Fund is paid on implementation which would allow for early measures to be put in place to protect the brand of the island and mitigate against future impact.  It is also proposing that this fund is paid annually throughout the construction period to achieve the following: <ul style="list-style-type: none"><li>safeguarding and enhancing the image and perception of North Anglesey as a visitor destination; and</li><li>a programme of measures or works to attract greater visitor numbers to North Anglesey; and</li></ul>		Ongoing	Further discussions between Horizon and IACC required on detailed drafting of the S106 agreement and amount of Tourism Fund.



Topic	Sub topic	Issue	SoCG ID	Document Reference /Signpost/ Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
					<ul style="list-style-type: none"><li>collation of monitoring data such as such as tourism attractions data, STEAM data, or other related or equivalent data on the tourism sector on Anglesey; and</li><li>Other such matters agreed as between the Council and the Developer which promote or support Anglesey as a tourism destination.</li></ul> <p>Horizon is also proposing an annualised contribution towards a Tourism Officer to assist the Council in implementing the above measures.</p> <p>S106 agreement to the early delivery of a visitor centre. This is a multi-million pound in kind cost to Horizon.</p> <p>n addition to the above, the draft DCO S106 agreement includes a contribution of £125,000 in recognition of the early work that may be required to demonstrate that Anglesey is open for business.</p>			
	Transport	Road Condition	IACC0047	Draft DCO S106 agreement	<p>Horizon and IACC Highways have agreed to carry out condition surveys of the A5025 between the proposed Power Station Access Road Junction and the existing Magnox junction through Tregele, together with Junction 3 of the A55, HGV routes from Parc Cybi and the bus route from Dalar Hir on the local network (i.e. when not on the A55 and slip roads).</p> <p>Following the surveys, Horizon will prepare a schedule of monitoring and agree with IACC Highways, the extent of works to upgrade the road surfacing where required. Horizon will financially support the initial re-surfacing (of the above identified parts of the carriageway) and carry out periodic joint inspections throughout the lifecycle of the construction works. This would then inform Horizon of the requirement for ongoing repair works. The assumption is that the works would be undertaken by IACC Highways maintenance teams, financed by Horizon.</p>		Agreed	No further action
		Traffic Volumes	IACC0048	<p>Transport Assessment (contained at Appendix C2.04 of the Environmental Statement) (APP-101)</p> <p>Overarching WN Code of Construction Practice (CoCP) (Deadline 5 version)</p>	<p>Thresholds to be agreed for maximum Wylfa Newydd development traffic levels along A5025 for the following stages of the Project; Pre completion of Off-line Highway Works; and during the peak year of construction.</p>	<p>The Wylfa Newydd CoCP (Deadline 5 submission version) states that Horizon commits to limiting the number of HGV movements by road so to not exceed a maximum of 40 HGV deliveries (80 movements) per hour and 160 HGV deliveries (320 movements) per day.</p> <p>Horizon Horizon has also now proposed caps on HGVs prior to the offline road improvements being in place as follows:</p> <ol style="list-style-type: none"><li>Monthly maximum of 2,500 HGV movements each way;</li><li>Hourly maximum of 22 HGV movements each way.</li></ol>	Ongoing	<p>Further discussions between Horizon and IACC required</p> <p>Horizon's view is that IACC's outstanding concerns are addressed by the amendments to the Wylfa Newydd CoCP, but this has not been confirmed by IACC</p>
		Car sharing	IACC0049	Wylfa Newydd CoCP (Deadline 5 version)	<p>How will car share success be monitored?</p> <p>The information provided by Horizon is noted but its efficacy is not agreed (both its ability to be enforced and the impact of the measures once enforced).</p>	<p>The Wylfa Newydd CoCP (Deadline 5 version) states that the car sharing strategy will be promoted, monitored, managed and enforced by Horizon.</p> <p>Horizon has shared an approach to setting and monitoring mode share targets with IACC (on 25.01.19) and is awaiting views on the approach.</p> <p>The draft S106 agreement includes a Transport Contribution (both annual and additional mitigation) which would be paid to the Council to use to mitigate transport effects where monitoring indicates that it is appropriate to do so.</p>	Ongoing	<p>Further discussions between Horizon and IACC required on whether Horizon approach to monitoring is adequate</p>

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		Traffic management	IACC0050	<p>Appendix F of the Transport Assessment (provided at Appendix C2.04 of the Environmental Statement) (APP-101)</p> <p>Wylfa Newydd Code of Construction Practice (CoCP) (amendments submitted at Deadline 5 (12 February 2019)</p> <p>Draft DCO S106 agreement</p>	<p>Monitoring of construction traffic routes (i.e. both workers and delivery/construction vehicles).</p> <p>The information provided by Horizon is noted but its efficacy is not agreed (both its ability to be enforced and the impact of the measures once enforced).</p>	<p>ection 5.6 of the Wylfa Newydd CoCP (Deadline 5 version) states that Horizon will monitor the effectiveness of its traffic management through a suite of indicators consistent with appropriate good practice and guidance. The following monitoring methods will be adopted:</p> <ul style="list-style-type: none"><li>• monitoring and analysis of deliveries using an integrated DMATS</li><li>• monitoring and analysis of daily shuttle bus movements including routes, frequencies and construction worker demand</li><li>• monitoring and analysis of daily Park and Ride bus movements including frequencies and construction worker demand</li><li>• monitoring analysis of daily car park usage at Wylfa Newydd Development Area and Park and Ride facility</li><li>• monitoring and analysis of number of construction workers at each work site each day</li><li>• monitoring and analysis of weekend travel by construction workers</li><li>• monitoring and analysis of number of Site Campus residents on a weekly basis</li><li>• monitoring and analysis of worker home locations</li><li>• monitoring vehicle occupancy (via spot checks) to be undertaken at car park entrances</li><li>• monitoring of issues reported by the public or stakeholders as describe in section 3 of this Wylfa Newydd CoCP</li></ul> <p>Construction routes to the Project are defined and drivers will be required to follow these routes. Signage, within information packs, will be provided to aid drivers (see Traffic and Transport Strategy of the WN CoCP, Deadline 5 version). A dynamic vehicle tracking system, which is proposed to monitor, manage and control deliveries to site, will help identify any vehicles which do not follow these routes if problems are highlighted by members of the public or stakeholders (see Logistics Centre sub-CoCP, APP-419 and updates to WN CoCP at Deadline 2 (4 December 2018), Deadline 5 version).</p>	Ongoing	<p>Further discussions between Horizon and IACC required on whether Horizon approach to traffic management is adequate</p>
	Education, Skills and Labour	Ex-Magnox workers	IACC0051	<p>Jobs and Skills Strategy (APP-411)</p> <p>Draft DCO S106 agreement</p>	<p>Campaign to attract and recruit ex-Magnox workers and a marketing campaign and tracker system to attract skilled people back to Anglesey.</p> <p>The information provided by Horizon is noted but its efficacy is not agreed.</p>	<p>The JSS states at paragraph 6.2.5: Horizon would be the principal employer for the operational staff, it is anticipated that the workforce would be recruited from:</p> <ul style="list-style-type: none"><li>• Qualified Apprentices and Trainees from other schemes;</li><li>• Qualified Graduates;</li><li>• Related industries and organisations, including Ex Armed Forces;</li><li>• The existing UK nuclear workforce (Horizon has established links with Magnox to discuss the potential transition of staff from north Wales sites to the operational workforce); and</li></ul>	Ongoing	<p>Further discussions between Horizon and IACC required</p> <p>Horizon's view is that IACC's outstanding concerns are addressed by the draft S106 agreement, but this has</p>

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						<ul style="list-style-type: none"><li>Members of Horizon’s existing staff wishing to transfer to the operational workforce.</li></ul> <p>The remit of the Wylfa Newydd Employment and Skills Service (WNESS) is to focus on:</p> <ul style="list-style-type: none"><li>Ensure the best/most suitable people are able to work on the Wylfa Newydd Project and that it benefits local residents as a result;</li><li>Provide a point of access into the Wylfa Newydd Project for local people seeking work (including people who have moved away and want to return);</li><li>Support any employers who lose employees to the Wylfa Newydd Project to backfill their roles; and</li><li>Guide the provision of training to support these aims.</li></ul> <p>This is proposed to be secured through the draft DCO S106 agreement.</p> <p>Horizon is proposing that detailed measures in relation to education and skills are secured by the Jobs and Skills implementation Plan, which focusses on years 1 to 3 of the construction period and the draft s106 requires to be developed by IACC and Horizon in consultation with the Jobs and Skills Engagement Group.</p>		not been confirmed by IACC
		Local Jobs	IACC0052	Jobs and Skills Strategy (APP-411)  Draft DCO S106 agreement	<p>Local Jobs – opportunities from higher level managerial and professional jobs through to support functions need to be identified and the number of local people performing those roles needs to be quantified and monitored during construction, operational and decommissioning.</p> <p>The information provided by Horizon is noted but its efficacy is not agreed.</p>	<p>It is proposed that this would be monitored through the Jobs and Skills Engagement Group, as set out in the draft S106 shared with IACC. This could be monitoring against Key performance Indicators, such as number of local people in particular roles.</p> <p>Further information is provided in the draft terms of reference for the WNMPOP which have been shared with IACC.</p>	Ongoing	<p>Further discussions between Horizon and IACC required</p> <p>Horizon’s view is that IACC’s outstanding concerns are addressed by the draft S106 agreement, but this has not been confirmed by IACC</p>

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		Primary Schools	IACC0053	<p>Jobs and Skills Strategy (APP-411)</p> <p>Wylfa Newydd CoCP (Deadline 5 version)</p> <p>Draft DCO S106 agreement</p>	<p>Primary Schools – the IACC is concerned that the impact on primary schools will not be fully understood until the Project is under construction. This is partly because the existing surplus capacity in primary schools is intended to be addressed by the current new schools programme.</p> <p>The information provided by Horizon is noted but its efficacy is not agreed.</p>	<p>The draft S106 agreement includes an up-front education contribution and an education contingency fund which would be paid according to clear triggers, including that the number of pupils at a local school is over 95% capacity. The funding per pupil - based on the Horizon estimate of children - is over double the reported Welsh Government spend per pupil on Anglesey and so is considered da robust mitigation.</p>	Ongoing	<p>Further discussions between Horizon and IACC required</p> <p>Horizon’s view is that IACC’s outstanding concerns are addressed by the draft S106 agreement, but this has not been confirmed by IACC</p>
		Training	IACC0054	<p>Jobs and Skills Strategy (App-411)</p> <p>Wylfa Code of Construction Practice (CoCP) (Deadline 5 version)</p> <p>Draft DCO S106 agreement</p>	<p>IACC require additional information in relation to the training places to be provided by year, course and skill level. Further detail on how large the problem of backfilling and the frequency of this monitoring. Further detail should be provided in relation to the Service Hubs/Management Boards as these are considered to be the mechanism for monitoring. There is also a need to understand how the monitoring will trickle down to the supply chain.</p> <p>The information provided by Horizon is noted but its efficacy is not agreed.</p>	<p>Horizon is proposing that detailed measures in relation to education and skills are secured by the Jobs and Skills Implementation Plan, which focusses on years 1 to 3 of the construction period and is secured by the draft DCO S106 agreement. The Jobs and Skills Engagement Group would have a role in updating the Implementation Plan. The draft DCO S106 agreement also now proposes that the Jobs and Skills contribution be paid directly to the Council for onward payment to specialised training providers including Grwp Llandrillo Menai.</p> <p>The Jobs and Skills Implementation Plan will include monitoring and reporting protocols on key performance indicators.</p> <p>One of the functions of the Wylfa Newydd Employment and Skills Service is to support employers backfill roles that have been lost as a result of the Wylfa Newydd Project. This is secured through the S106.</p> <p>Monitoring would be carried out by the Jobs and Skills Engagement Group.</p>	Ongoing	<p>Further discussions between Horizon and IACC required</p> <p>Horizon’s view is that IACC’s outstanding concerns are addressed by the draft S106 agreement, but this has not been confirmed by IACC</p>



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	Health and Wellbeing	Health and Wellbeing monitoring group	IACC0055	Health Impact Assessment Report (APP-429)  Draft DCO S106 agreement	Health and Wellbeing monitoring group that will consider monitoring data relevant to the project and when a set key of topics and indicators are agreed. The IACC welcome the commitment by Horizon to facilitate bespoke analysis of routinely collected public health data relevant to the project. If required the group will discuss the need for additional mitigation or follow-up investigation.	<p>A number of mitigation commitments have been developed through the HIA. Horizon would establish an external stakeholder group (the Health and Well-being Engagement Group) that would include members of the health and emergency services to monitor the implementation of the HIA mitigation strategy and provide advice on its delivery.</p> <p>The HIA confirms that when appropriate Horizon would facilitate bespoke analysis of routinely collected public health data (existing indicators), relevant to the Project. The information would inform discussion by the Health and Well-being Engagement Group. If appropriate the Group would discuss the need for additional mitigation or follow-up investigation. This will be secured by the DCO S106 agreement. Horizon has shared draft terms of reference for the</p>	Ongoing	<p>Further discussions required on monitoring framework</p> <p>Horizon's view is that IACC's outstanding concerns are addressed by the draft S106 agreement, but this has not been confirmed by IACC</p>
	Housing and Accommodation Strategy	Workforce Accommodation	IACC0056	Workforce Accommodation Strategy (APP-412)  Draft DCO S106 agreement	<p>Monitoring framework put in place at the outset of the Project to record the worker type, the location and type of accommodation occupied, together with monitoring of house prices and rent in North Anglesey and the Island as a whole.</p> <p>The information provided by Horizon is noted but its efficacy is not agreed.</p>	<p>The WAMS (secured through the s.106) will:</p> <ul style="list-style-type: none"><li>• Maintain a database of suitable properties offered by landlords and providers, including Horizon's own TWA.</li><li>• Provide a means for workers to search for housing that meets their needs and be put in contact with the property owners or their agents.</li><li>• Capture and record data about the choices of workers, and provide reports on this data to be used for management purposes.</li></ul> <p>It will also mean collecting monitoring data and reporting on it to stakeholders and using that data to help guide workers' choices and achieve better outcomes for local communities. Monitoring will also help inform and target mitigation measures, for example those aimed at the Welsh language and culture.</p> <p>This is secured through the draft DCO S106 agreement, which will append the terms of reference for the WAMS.</p>	Ongoing	<p>Further discussions between Horizon and IACC required</p> <p>Horizon's view is that IACC's outstanding concerns are addressed by the draft S106 agreement, but this has not been confirmed by IACC</p>

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		Occupancy	IACC0057	Workforce Accommodation Strategy (APP-412)  Draft DCO S106 agreement	Monitor and enforce occupancy controls in existing caravan/tourer sites and of HMO's PRS.  The information provided by Horizon is noted but its efficacy is not agreed.	This is considered to be a role for IACC and the draft DCO S106 agreement includes an annual contribution to the Council which may be applied towards the cost of monitoring accommodation enforcement issues, including unlawfully sited caravans.  The WAMS Oversight Board (secured through the draft DCO S106) will consider monitoring data from Horizon and other organisations, including IACC.	Ongoing	Further discussions between Horizon and IACC required  Horizon's view is that IACC's outstanding concerns are addressed by the draft S106 agreement, but this has not been confirmed by IACC

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WELSH LANGUAGE & CULTURE								
Welsh Language and Culture	Overall Project Impact	Overall Project Impact	IACC 0058	Welsh Language Impact Assessment (WLIA) Non-Technical Summary (NTS) (APP-430)  WLIA (APP-432)	IACC's has concerns that the WLIA focuses on likely project impacts in relation to the overall KSA Table B.7 and B.8). Whilst some geographic analysis of the baseline KSA is provided (sections A.6.60 to A.6.105), no scoring assessment is provided for likely impacts of the overall project at community, area, or island level. The adverse impacts on the Isle of Anglesey and at community level are assessed by IACC as likely to be greater than that identified by the WLIA and need to be better reflected in the steps proposed in the WLCMES strategy to avoid, reduce, mitigate or compensate for these likely impacts.  IACC does not agree that the beneficial effects outweigh the adverse for all areas on Anglesey and the KSA.	Horizon undertook a WLIA to assess the likely effects of the construction, operation and decommissioning stages of the Wylfa Newydd DCO Project against five key aspects of community life being: <ul style="list-style-type: none"><li>Population characteristics;</li><li>Quality of life;</li><li>Economic factors;</li><li>Infrastructure supply and education; and</li><li>Social and cultural aspects.</li></ul> The key findings of the WLIA including the positive and adverse effects of the project are detailed in the WLIA [APP-423] and as summarised in section 4 of the WLIA Non-Technical Summary (WLIA NTS) [APP - 430]. Horizon's view is that with mitigation – detailed throughout the WLIA and summarised in section 5 of the WLIA NTS [APP-430] – that the beneficial effects outweigh the adverse.	Not agreed	No further action
	Overarching Strategy	Welsh Language and Culture Golden Thread	IACC 0059	WLIA Non-Technical Summary (NTS) (APP-430)  WLIA (APP-432)  Workforce Accommodation	IACC has welcomed and commented on the Horizon Golden Thread Note.  IACC recognises Horizon's current engagement and commitment in advocating the Welsh language as a 'Golden Thread' throughout all aspects of its project. The Development Consent Order (DCO) application, however, has not caught up with this and the documentation does not sufficiently reflect this commitment. In particular, the Workforce Accommodation Strategy and Workforce	Horizon is committed to protecting and promoting the Welsh language and culture as part of the Wylfa Newydd Project, ensuring compliance with relevant legislation, national and local policy and guidance.  Horizon has prepared a note 'Welsh language and culture golden thread note' to provide an overview of Horizon's approach to treating Welsh language and culture as an all-encompassing theme and golden thread across all relevant aspects of the Wylfa Newydd Project throughout its duration.	Not agreed	No further action

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				Strategy (APP-412)  Workforce Management Strategy (APP-413)  draft DCO S106 agreement	Management Strategy do not have robust thresholds for reporting and monitoring the spatial distribution of workers in order to minimise the potential effects of a large temporary workforce on the use of the Welsh language within local communities.	Horizon fully embraces the importance of Welsh language and culture to the communities of Anglesey and North Wales. Horizon is committed to supporting and enhancing Welsh language and culture across all aspects of the Wylfa Newydd Project throughout its duration, including through the development of measures to mitigate adverse effects and enhance beneficial ones. Schedule 1 of the draft s.106 agreement shared with IACC on 23.01.19 secures mitigation with regard to the Welsh language and culture. It is acknowledged that IACC have yet to provide detailed comments on these terms.  Horizon's overall position is set out in the WLIA NTS and the WLIA.		
		Welsh Language and Cultural Mitigation and Enhancement Strategy (WLCMES)	IACC 0060	WLCMES – Appendix I1 of WLIA (APP-432))  WLIA NTS (APP-430)  WLIA (APP-432)  Mitigation Route Map (REP2-038)  draft DCO S106 agreement  Draft DCO (APP-029)	The IACC welcomes the overall mitigation measures proposed, but further information is required on Horizon's commitment to these and timing and resourcing of measures.	Further detail in respect of the mitigation proposed in relation to the impact on Welsh Language and Culture can be found in the WLCMES and WLIA. Schedule 1 of the draft s.106 agreement shared with IACC on 23.01.19 secures mitigation with regard to the Welsh language and culture. It is acknowledged that IACC have yet to provide detailed comments on these terms.	Ongoing	Further discussions required between Horizon and IACC
		IACC Welsh Language Strategy	IACC 0061	Section A.2, Volume A of the WLIA (APP-432)	IACC agree that Horizon has considered IACC's Welsh Language Strategy and Welsh Government's strategy i.e. a million Welsh speakers by 2050. In principle, the methodology for the WLIA is agreed, however, the IACC have raised concerns on the application of the methodology.  As a result, in IACC's view the likely effects are underplayed and the proposed mitigation and compensation measures deficient.	Horizon acknowledges the national and local language strategies and where possible, seeks to support the IACC in achieving those strategies. The focus of mitigation and enhancement measures workshops reflected the key themes of IACC's Welsh Language Strategy (which in turn reflects Welsh Government strategy, i.e. a million Welsh speakers by 2050) and the IACC detailed Welsh Language Plan (which is updated on an annual basis). It is agreed that the WLIA gives the appropriate consideration to adopted national and local language strategies as set out in Section A.2, Volume A of the WLIA [APP-432].	Not agreed	No further action
	Method	WLIA Methodology	IACC 0062	Section A.5, volume A of the WLIA (APP-432)  Chapter C1 of the Environmental	IACC agrees with the methodology used in the WLIA, except in relation to dependents associated with migrant workers.  Horizon currently calculates that 220 school aged children will be relocating to the Key Socio-economic Study Areas (KSA) during the construction phase of the Wylfa Newydd DCO project. IACC has serious reservations about the	Horizon considers that the methodology set out in the WLIA [APP-432] is appropriately robust.  The assumptions relating to the number of school aged children expected to move into the KSA during construction is based on assumptions derived from the socio-economic assessment (Chapter C1 of the Environmental Statement – [APP-088]).	Not agreed	No further action

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				Statement) (APP-088).	<p>methodology Horizon used to calculate the number of dependents that the migrant workers will bring to Anglesey which equates to only 3% bringing their families with them. IACC does not accept the figures used are a reasonable case and requests sight of the details of this methodology in order to understand how these assumptions were derived and reserves the right to submit its own figures for dependents.</p> <p>The IACC appreciates that the precise numbers, timing and location of dependant arrivals are not currently known. However, the IACC will require data concerning the number, age, language backgrounds, place of residence and intended education setting of choice of the dependants that will be relocating to Anglesey with Horizon employees in order to ensure that the education authority and the schools can make adequate plans for the additional school intakes. IACC expects this data to be collected prior to the final signing of employment contracts. Horizon must identify strategies to anonymise data and identify ways of overcoming any data protection issues so that the IACC can be provided with the relevant information prior to the commencement of employee employment (and hence the arrival of dependants in Anglesey schools).</p>	<p>Horizon (and other organisations as appropriate) will collect socio-demographic information from workers as part of the induction process which will include their permanent and temporary address, linguistic capabilities, number and age of dependants moving to the KSA with them, which will indicate the likely impact on local school places. Horizon has accepted the validity of such an exercise but draw attention to data protection issues that prevent the sharing of such data. Each worker would be given a unique ID so that anonymised data could be transferred to local authorities without breaching data protection laws.</p> <p>The WLIA [APP-432] assesses the worst case scenario in terms of the projected number of dependents. Measure 13 of Appendix B4-1 of the WLIA [APP-432], (the WLCMES), notes that Horizon will collect aggregate and anonymised data on partners and children moving to the KSA with construction and operational workers and share this data with local authorities. This will take account of data protection considerations but, where possible, include numbers of children, ages and Welsh language skill levels to provide information for education and early years planners.</p> <p>Additional monitoring requirements in relation to the number of workforce children accessing school places and the Welsh language immersion centres is being agreed with IACC.</p>		
		WLIA Study Area	IACC 0063	Section A.5, Volume A of the WLIA (APP-432)	<p>The study areas assessed in the WLIA are the KSA and five specific sites including the Wylfa Newydd Development Area.</p> <p>The analysis of likely effects of the WNP for the KSA gives values for the overall KSA. No assessment is provided for likely impacts at community, area, or island level. This means that the full impact of Wylfa Newydd on the Welsh language and culture on specific communities is not adequately measured. The WLCMES mitigation and enhancement strategies need to reflect this as detailed in the WLC chapter of IACC's LIR[REP2-069].</p>	<p>WLIA methodology and study are set out in the WLIA [APP-432]. Horizon considers that the methodology and study area adopted are appropriate.</p>	Not agreed	No further action
		Distribution of construction workers (outside of the Site Campus)	IACC 0064	WLIA (APP-432)	<p>The WLC chapter of IACC's LIR [REP2-069] includes a discussion on the limitations of the Gravity Model and highlights concerns about the Gravity Model and asks Horizon to provide "clearer and more robust assumptions". The methodology is considered by IACC to be insufficiently fine grained as to enable an accurate indication of where non-home-based construction workers and their families will reside on Anglesey.</p>	<p>The assessment of effects for Project-wide effects presented in section B.4 (Q.1) of the WLIA [APP-432] provided an assessment of effects at KSA and sub-area level, town/ward level and within the Wylfa Newydd Development Area level. In addition, an assessment of effects from Associated Developments are presented at a Local Area of Influence level. These are presented in sections C.4, D.4, E.4, F.4 and G.4 of the WLIA [APP-432].</p> <p>The assumptions, methodology and purpose of the Gravity Model regarding distribution of construction workers outside of the site campus has been discussed between both parties and there is general agreement that the Gravity Model</p>	Not agreed	No further action



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						<p>presents a best fit approach to inform assessments of distribution of construction workers.</p> <p>The use of the Gravity Model as a best fit approach for the DCO was agreed in meetings with Welsh Government and IACC, including those on 13 July 2016 and 8 June 2017.</p>		
		Range of Scenarios assessed as part of the WLIA	IACC 0065	Section A.5, Volume A of the WLIA (APP-432)	IACC acknowledge that Horizon have used the WLIA methodology that is widely used in planning applications. However, there are limitations to this methodology as described in the WLC chapter of IACC's LIR. The methodology is not designed to test or assess a range of scenarios. IACC has requested that Horizon model different possible scenarios with relation to the possible residence of Horizon workers with school aged dependants in order to model impact scenarios in Anglesey schools.	WLIA methodology and study areas have been submitted and Horizon's position is in the WLIA [APP-432]. Horizon considers that the methodology and study area adopted are appropriate.	Not agreed	No further action
	Baseline and Data Collection	WLIA Baseline	IACC 0066	Section A.6, Volume A of the WLIA and Appendix A7-1 (APP-432)	The baseline data presented in the WLIA does not provide a detailed, community level profile of the range of the current use of Welsh within key community social networks, community activities and voluntary / community groups. While the IACC has conducted an initial profile of community language use, a robust linguistic profile of all communities within Anglesey as well as the KSA is required which notes in some detail the range and nature of community based ventures that work through the medium of Welsh or bilingually in order to have clear view of the situation as it is at present. This would assist with forming a more fine-grained analysis of the current baseline data and assist in the task of assessing what linguistic changes will or may take place over time and whether further remedial steps will need to be taken to mitigate and enhance community level use of Welsh.	The WLIA Baseline has been submitted and Horizon's position is in the WLIA [APP-432]. The baseline has been reviewed by the Welsh Language Impact Assessment Steering Group and Horizon's considers it is robust.	Not agreed	No further action
		National and Local Language Policies	IACC 0067	Section A.2, Volume A of the WLIA (APP-432)	IACC is not convinced that the mitigation and monitoring strategies from a Welsh language and culture perspective fully meet with National and Local Language Policies. Without being strengthened as set out in the Welsh Language and Culture Chapter of IACC's LIR [REP2-069], the Council remains concerned that Policy tests in the Anglesey and Gwynedd Joint Local development Plan (July 2017) will not be met. These requirements are detailed in the Welsh Language and Culture Chapter of the IACC LIR [REP2-069].	<p>Horizon acknowledges the national and local language strategies and where possible, seeks to support the IACC in achieving its aims. The Welsh language and culture mitigation and enhancement measures were informed by stakeholder workshops and reflect the key themes of IACC's Welsh Language Strategy (which in turn reflects Welsh Government strategy i.e. a million Welsh speakers by 2050) and the IACC detailed Welsh Language Plan (which is updated on an annual basis). Horizon's view is that the WLIA gives the appropriate consideration to adopted national and local language strategies as set out in Section A.2, volume A of the WLIA [APP-432].</p> <p>Horizon considers the commitments in the s.106 agreement which combine contributions, monitoring and actions represent appropriate mitigation.</p>	Not agreed	No further action
	Modelling and Assumptions	Modelling and Assumptions	IACC 0068	Volumes A-G of WLIA and WLCMES - Appendix B4-1 (APP-432)	IACC is still unclear on the level of dependants anticipated to be associated with the Project. The IACC are still unclear on how many workers will bring their families and how many school aged children will be attending local schools.	In relation to modelling and assumptions, Chapter A5 of the WLIA [APP-432] presents Horizon's position on methodology. The socio-economic assessment presented in chapter C1 of the Environmental Statement [APP-088]	Not agreed	No further action

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				C1 of the Environmental Statement ((APP-088)	In paragraph 7.1.37 of IACC's LIR [REP2-067], IACC provide their own estimates of dependents during construction.	<p>considers the demand for school places as a result of families moving into the KSA with non-home-based workers. Horizon has outlined the approach to calculating the potential number of dependants in the DCO application; see ES Volume B - Introduction to the environmental assessments B2 - Socio-economics [APP-067].</p> <p>Horizon notes that this methodology was discussed with IACC a number of times in recent years (including in the aforementioned meeting on 13 July 2016 and 8 June 2017) and no alternative method was put forward that would more appropriately estimate potential dependents.</p> <p>Horizon's detailed response to IACC's calculation of projected dependents during construction is provided in paragraph 7.4.5-6 of Horizon's response to IACC's LIR [REP3-004]. However in the unlikely event that Horizon's estimation is too low, a significant Welsh Language Education Contingency Fund has been provided for Welsh language mitigation which would allow for more than doubling the provision of Welsh language immersion teaching.</p>		
	Assessment	Consideration of Welsh culture alongside Welsh language	IACC 0069	WLIA (APP-432)	<p>IACC has welcomed and commented on the Horizon Golden Thread Note.</p> <p>IACC recognises Horizon's current engagement and commitment in advocating the Welsh language as a 'Golden Thread' throughout all aspects of its project. The Development Consent Order (DCO) application, however, has not caught up with this and the documentation does not sufficiently reflect this commitment. In particular, the Workforce Accommodation Strategy) and Workforce Management Strategy do not have robust thresholds for reporting and monitoring the spatial distribution of workers in order to minimise the potential effects of a large temporary workforce on the use of the Welsh language within local communities.</p>	<p>Horizon's provision is that the assessment within the WLIA has taken into consideration social and cultural aspects. Horizon is committed to supporting and enhancing Welsh language and culture as well as mitigating adverse effects which are likely to arise. Horizon has developed a Welsh Language and Culture Mitigation and Enhancement Strategy (WLCMES) (see WLIA appendix B4-1) working alongside language planning specialists. The methodology for developing mitigation and enhancement measures is presented in greater detail in WLIA appendix B4-1.</p> <p>Schedule 1 of the draft DCO s.106 secures mitigation and enhancement with regard to Welsh language and culture. This includes an annual commitment to evaluating the impact of the Project on the Welsh language. It is acknowledged that IACC have yet to provide detailed comments on these terms.</p>	Not agreed	No further action
		Effect of incoming workers and their dependents on school/language immersion centres' capacity and use of Welsh language within schools	IACC 0070	Volumes B of WLIA and WLCMES - Appendix B4-1 (APP-432)	<p>IACC welcomes Horizon's commitment in Measure 13 to collect aggregate and anonymise data on partners and children moving in to the KSA. The commitment is also in line with IACCs insistence that the early sharing of the data is essential to put the necessary mitigation plans in place. In the absence of data, mitigation measures will have to be developed and funded on a worst case scenario.</p> <p>IACC's position is that an influx of children (the majority who are likely to be non-Welsh speaking) will have a significant effect on the use of the Welsh language and therefore Horizon needs to be pro-active in terms of forward-planning for those effects via mitigation measures.</p>	<p>Horizon is committed to monitoring the impacts of the Project on the Welsh language and culture and is developing mitigation as appropriate to address these impacts. This would include monitoring dependents of workers and the schools that they choose to attend.</p> <p>Schedule 1, clause 9.1 of the draft DCO s.106 states that Horizon will collect aggregate and anonymised data on the Workforce Dependents through the Worker Accommodation Management Service and this will include detail on locations of where Workforce Dependents are living, their Welsh language skills and number of children and their ages.</p>	Ongoing	IACC to consider whether they are content with amendments made to Draft DCO s.106 (shared 23.01.19). Principles for release of contingency

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					<p>Based on current capacity and anticipated growth in need for additional support, the Authority has identified the need for Horizon to fund the employment of:</p> <ul style="list-style-type: none"><li>• an additional 5 Welsh immersion teachers to meet anticipated primary school pupil needs (2.5 equivalent in each of 2 additional language centres)</li><li>• 5 specialist Welsh immersion teachers and 5 Welsh immersion (Level 3) classroom assistants (i.e. 1 teacher and 1 classroom assistant in each of Anglesey's 5 secondary schools) to meet anticipated KS3 pupil needs</li><li>• An additional 2 English and as Additional Language (EAL) teachers to support children aged 7 and over for whom English is an additional language on arrival in Anglesey schools.</li></ul> <p>This provision will need to be funded and <u>established well in advance of the arrival of the first Horizon worker children</u> to ensure that the provision is in place and well-embedded in time for the first arrivals. This support will need to be ongoing through the construction, operation and decommissioning phases. In the absence of precise figures agreed by both parties, planning on the basis of reasonable worst case scenario will be necessary.</p>	<p>The updated draft DCO s.106 agreement issued to IACC and Welsh Government on 23 January 2019 includes the early release of Welsh education funding upon commencement of the works (i.e. the first works to start on site) (Schedule 15).</p> <p>It then provides for the provision of funding for Welsh language immersion education, with the scope of funding set out per annum to address the direct need created by the Wylfa Newydd DCO Project. The first payment will be paid prior to implementation with subsequent payments made on the annual anniversary of the implementation.</p> <p>A Welsh Language Education (Contingency) Fund has been provided, where funding will be released on set triggers, in the event that monitoring indicates that it is required.</p> <p>Schedule 1 clause 10 of the draft DCO s.106 (shared with IACC and Welsh Government on 23.01.19) provides a commitment to establishing a Welsh Language and Culture Engagement Group.</p> <p>Schedule 1 clause 10.3 sets out the duties and responsibilities of the Welsh Language and Culture Engagement Group. These include monitoring the obligations set out in Schedule 1 of the Draft DCO s.106 in relation to Welsh language and culture.</p>		<p>fund are included however buy-in on these is requested before full drafting is produced.</p>
		Increased demand for accommodation affecting affordability of housing for local people	IACC 0071	Volumes B of WLIA and WLCMES - Appendix I1 (APP-432)	<p>IACC's position is that further detail on the approach to the Workforce Accommodation Strategy and how it could be used to direct construction workers to areas where effects on the Welsh Language and Culture could be reduced, or benefits enhanced.</p> <p>Whilst IACC welcomes Measure 24 Horizon has developed its WLCMES for the run up and construction phases of the Project only. IACC requires Horizon to agree:</p> <ol style="list-style-type: none"><li>1. to implement the WLCMES and its annual action plans annually throughout the construction, operation and decommissioning periods; and to establish procedures to monitor and evaluate annually throughout all three phases of the project.</li></ol>	<p>Horizon is committed through the DCO s.106 to monitoring the impacts of the Project on Welsh language and culture and has developed mitigation as appropriate to address these impacts.</p> <p>Schedule 1 clause 9.2 of the draft DCO s.106 (shared with IACC and Welsh Government on 23.01.19) provides a commitment that Horizon, prior to implementation of the Wylfa Newydd DCO Project, will agree parameters for an annual evaluation of the impact of the Wylfa Newydd DCO Project on the Welsh language in the KSA. Horizon will thereafter undertake that annual evaluation in accordance with the approved parameters for the duration of the construction phase up to five years from the start of the operational period.</p>	Ongoing	<p>IACC to consider whether they are content with amendments made to Draft DCO s.106 (shared 23.01.19).</p>
	Mitigation	Lack of detail with regards to proposed timescales for delivery of mitigation and enhancement measures	IACC 0072	WLCMES - Appendix B4-1 of WLIA [APP-432]	<p>IACC's position is that there is insufficient detail in the WLCMES on the monitoring of each individual measure, and in particular, in relation to costs, delivery mechanism and timescale.</p>	<p>Details of timing of mitigation, how this will be secured, and the appropriate triggers are set out in the WLCMES in the WLIA [APP-432] as follows:</p> <ul style="list-style-type: none"><li>• Table 3-1 Summary of mitigation and enhancement measures relating to the workforce</li><li>• Table 3.2 Summary of mitigation and enhancement measures relating to children, young people and families</li></ul>	Ongoing	<p>IACC to consider whether they are content with amendments made to Draft DCO</p>

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						<ul style="list-style-type: none"><li>Table 3-3 Summary of mitigation and enhancement measures relating to community and local services</li></ul> <p>The measures in the WLCMES are all secured through the DCO s.106 agreement (schedule 1 primarily) and appropriate triggers for their implementation are included in the Draft DCO s.106 as well as detail on the funds allocated to obligations. The draft DCO s.106 also includes details on the frequency of monitoring of several obligations and the role of the Welsh Language Engagement Group in monitoring and evaluating the delivery of the obligations.</p>		s.106 (shared 23.01.19).
		Welsh Language and Culture Coordinator (WLCC)	IACC 0073	WLCMES - Appendix B4-1 of WLIA [APP-432]	<p>The IACC welcome the commitment to appoint a WLC Coordinator to assist in the further development, implementation and monitoring of an agreed programme of actions. There is concern about the lack of details regarding specialist capacity required to carry out the role effectively. The post will require bilingual human resource capacity (applying the formula of 1 HR officer per 110 staff) and Welsh Language tutors. In addition, the IACC considers that for the necessary influence to be brought to bear within Horizon the post holder's position needs to be at a senior level.</p>	<p>Schedule1, clause 1.2 of the draft DCO s.106, provides a commitment that Horizon will employ a Welsh Language and Culture Coordinator from implementation of the Wylfa Newydd DCO Project, until the end of the operational phase. A WLCC was been appointed (and has been in post since 5 November 2018). The role of the WLCC includes the implementation of the mitigation and enhancement measures, set out in the Draft DCO s.106. The WLCC works within the stakeholder engagement team and is managed by the Head of Strategic Development (Wales). The WLCC is a member of the WLIA Steering group and will be a member of the WLC Engagement Group as well as the Horizon internal WLC management group.</p> <p>In addition, Horizon is funding a Welsh language officer at IACC, which is secured through Schedule 1, clause 6 of the draft DCO s.106 agreement.</p>	Agreed	IACC to consider whether they are content with amendments made to Draft DCO s.106 (shared 23.01.19).
		WLCMES Terms of Reference	IACC 0074	<p>WLCMES - Appendix B4-1 of WLIA (APP-432)</p> <p>Mitigation Route Map (REP2-038)</p> <p>Draft DCO s.106 agreement (shared with IACC and Welsh Government on 23.01.19)</p>	<p>The IACC welcomes the overall mitigation measures proposed but requires some further amendments before IACC is in full agreement with the WLCMES as detailed in the Welsh Language and Culture section of IACC's LIR [REP2-069].</p>	<p>The measures set out in the WLCMES are secured in Schedule 1 of the draft DCO s.106 agreement.</p>	Ongoing	IACC to consider whether they are content with amendments made to Draft DCO s.106 (shared 23.01.19).
		Appointment of specialist Linguistic Planner	IACC 0075	N/A	<p>Arad Research has been appointed by Horizon as specialist linguistic planners, and their role includes facilitating the workshops with key stakeholders and community groups, the feedback from which formed the basis for the WLCMES. Arad also acted as reviewers for the WLIA, including specific review of methodology and study areas.</p>		Agreed	



Topic	Sub topic	Issue	SoCG ID	Document Reference/Sign post/ Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
		Community Impact Fund	IACC 0076	Mitigation Route Map (REP2-038)  Draft DCO s.106 agreement (shared with IACC and Welsh Government on 23.01.19)	The nature and complexity of the project highlights the need for a specific fund to cover unforeseen circumstances.  The extent of the Community Fund and its parameters for use and hence the effectiveness of the mitigation it can supply are not agreed.	<p>The Community Fund, the purpose of which is to mitigate intangible or residual impacts on communities, is secured through Schedule 12 of the draft DCO s.106 agreement.</p> <p>The Community Fund (established at £4 million in the 23 .01.19 issue of the s.106 agreement) is proposed to be paid directly to IACC in identified tranches, reflecting the build-up and decrease of the workforce. The Community Fund is ring-fenced for certain geographical areas. Allocations under the fund are by IACC, in consultation with Gwynedd Council and Conwy County Borough Council in respect of the fund for the KSA and North Wales Police where the proposal may affect public safety.</p>	Ongoing	IACC to consider whether they are content with amendments made to Draft DCO s.106 (shared 23.01.19).
		Lack of focus on northern part of Anglesey	IACC 0077	Volume B and C of WLIA (APP-432)	There has been project intensification in north of the island. Site campus will now accommodate up to 4000 workers. There are no specific mitigations to address this geographical intensification in the Wylfa Newydd Development Area. There seems to be an acceptance that 4,000 workers will locate to the Site Campus, and therefore there does not seem to be any clarity regarding the potential failure of this approach and should this be the case the effects on communities in the north of the island or elsewhere should workers decide to move to other locations.	<p>The Site Campus is embedded mitigation to address the impact of the Wylfa Newydd construction workforce.</p> <p>Schedule 1 of the draft DCO s.106 agreement includes extensive mitigation, including induction packs for the workforce and provision of Welsh language and culture awareness training.</p> <p>The assessment presented in the WLIA [APP-432] considers effects on Welsh language and culture at different geographical scales, including at KSA, sub-divisions of the KSA and at ward level. The assessment is based on the predicted distribution of construction workers and their families from the results of the gravity model. It is considered by Horizon that the assessment is robust.</p>	Not agreed	No further action
		Upfront investment prior to FID	IACC 0078	WLIA and WLCMES - Appendix B4-1 (APP-432)	<p>Horizon acknowledges that the timing of mitigation measures varies, depending on the perceived effect and the lead-in time required for certain measures to become operational.</p> <p>Schedule 1 of the draft DCO s.106 agreement contains extensive mitigation measures in relation to Welsh language and culture.</p> <p>The updated draft s.106 agreement issued to Welsh Government on 23 January 2019 includes the early release of Welsh education funding upon commencement of the works (i.e. the first works to start on site) (Schedule 15).</p> <p>It also includes the provision of funding for Welsh language immersion education, with the scope of funding set out per annum to address the direct need created by the Wylfa Newydd DCO Project. The first payment will be paid prior to implementation with subsequent payments made on the annual anniversary of the implementation.</p> <p>A Welsh Language Education (Contingency) Fund has been provided, where funding will be released on set triggers, in the event that monitoring indicates that it is required.</p> <p>After the initial payment (referred to in schedule 15 as stated above) the first payment of the Welsh Language Officer contribution is payable prior to implementation with subsequent payment paid annually on the anniversary of implementation during the construction period. The Community Translation Service contribution is also payable prior to implementation.</p> <p>Horizon's response to detailed points raised by IACC in their LIR has been provided at Deadline 3 [REP3-004].</p>		Agreed	No further action

Topic	Sub topic	Issue	SoCG ID	Document Reference/Sign post/ Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
		Upgrade science, technology, engineering and maths (STEM) Facilities	IACC 0079	WLCMES - Appendix B4-1 of WLIA (APP-432)	<p>IACC agrees with the scope of Mitigation Measure 14.</p> <p>Mitigation Measure 15: As well as its current investment in the STEM facilities of Anglesey Schools and the Coleg Llandrillo Menai site in Llangefni, it is important for this investment to also include an emphasis on the value in pursuing careers in STEM subjects either wholly or in art through the medium of Welsh. This issue does not feature in the Welsh Language Impact Assessment or the WLCMES at present. Including such an emphasis in any publicity material and associated documentation will allow a more meaningful progression from schools to further and higher education (where the Coleg Cymraeg Cenedlaethol plays an important role in promoting the study of STEM subjects through the medium of Welsh) and on to employment with Horizon (where, again, an emphasis will be placed on the value of being a bilingual employee).</p> <p>IACC also requires that a more robust scheme than that which is currently proposed be developed to encourage and facilitate the post appropriate up-skilling of local residents. Horizon notes how it will seek to encourage Welsh speakers to progress into various employment roles with them or with their contractors (WLCMES Mitigation Measure 4). At present, no explicit emphasis is placed on the value of the Welsh language in these roles and in STEM subjects more broadly. This omission must be rectified. If the Wylfa Newydd DCO Project is to have a positive impact on the ability of young Welsh speakers to gain employment with Horizon (either directly or as a contractor), considerable emphasis will need to be placed on the various plans mentioned in the WLCMES (Mitigation Measure 4), including the production of Career Route Maps and Job Profiles, and the contribution of staff and contractors to various role model activities. Again, there is a need to ensure that these are effective role models, i.e. Welsh speakers working in a variety of roles and, ideally, ones who use the Welsh language in their roles.</p>	<p>In terms of promoting the value of STEM subjects, the draft DCO s.106 agreement shared with IACC on 23<sup>rd</sup> January 2019 notes that Horizon and IACC will agree an education strategy which confirm Horizon's engagement with schools and delivery of programmes such as the below (or equivalent replacement programmes):</p> <ul style="list-style-type: none"><li>engagement with the five secondary schools and 47 primary schools on Anglesey as well as the wider region.</li><li>engagement with the STEM Gogledd Project.</li><li>delivery of the 'Work Insight Week', or an equivalent scheme, to young people. This is a tailored week-long programme for Year 11, 12 and 13 students from schools in Anglesey, Gwynedd and Coleg Menai which provides students with an insight into the Wylfa Newydd Project and its opportunities for young people.</li></ul> <p>Schedule 1 of the draft DCO s.106 agreement also notes that Horizon will promote career opportunities at the Wylfa Newydd DCO Project by:</p> <ul style="list-style-type: none"><li>Distributing information on career opportunities at the Wylfa Newydd DCO Project (including the bilingual Wylfa Newydd 'Career Route Maps' and Job Profiles or equivalent schemes) to local communities and young people on a regular basis.</li><li>Developing role model activities and resources to encourage awareness of career opportunities within the community. Welsh-speaking Horizon staff (including Welsh learners) and local suppliers will be involved in such activities. Staff and contractors will take part in various 'role model' activities and resources such as case study video clips, written materials, presentations in schools.</li></ul>	Ongoing	IACC to consider whether they are content with amendments made to Draft DCO s.106 (shared 23.01.19).
		Mitigation securing mechanisms	IACC 0080	WLIA and WL&CMES - Appendix B4-11 [APP-432]  Mitigation Route Map [REP2-038]  Draft DCO s.106 agreement (shared with IACC and Welsh Government on 23.01.19)	<p>The mitigation measures in the WLCMES need to be enhanced for Horizon to demonstrate its full commitment to treating the Welsh language and culture as a 'Golden treads'. These amendments are detailed in the Welsh Language and Culture section of IACC's LIR.</p>	<p>The draft s.106 secures the mitigation related to Welsh language and culture. Horizon has shared an updated draft DCO s.106 agreement with IACC on 23.01.19, which includes updates to Schedule 1 to take account of IACC comments.</p>	Ongoing	IACC to consider whether they are content with amendments made to Draft DCO s.106 (shared 23.01.19).

Topic	Sub topic	Issue	SoCG ID	Document Reference/Sign post/ Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
		Approach to monitoring	IACC 0081	<p>WL&amp;CMES - Appendix B4-1 of WLIA (APP-432)</p> <p>Mitigation Route Map (REP2-038)</p> <p>Draft DCO s.106 agreement (shared with IACC and Welsh Government on 23.01.19)</p>	<p>The senior management group accountable for the delivery of WLCMES and Corporate Language Policy should include representatives from across the various operational areas of Wylfa Newydd and report on progress in implementing WLCMES to the Welsh Language Commissioner and External Steering Group on an annual basis. The External Steering group should be convened by IACC and chaired independently. Costs associated with ESG to be covered by Horizon.</p> <p>An independent evaluation of the impact of the progress of the WLCMES will be conducted annually by IACC with suitable compensation provided by Horizon to offset the cost of providing / procuring a robust monitoring and evaluation service.</p> <p>There should be continuous monitoring of workers, the developing patterns of where they choose to live and dependents.</p> <p>IACC also notes that whilst Horizon commits to data collection on families moving into the area, no such commitment is made to collect data on the language skills of its workforce and to update this data periodically. This baseline information is vital to establish a baseline for language skills progression of its workforce. Horizon adoption of a Welsh Language Skills Strategy as part of its Corporate Language Policy and WLCMES will provide the mechanism for this.</p>	<p>Schedule 1, clause 1.4 of the draft DCO s.106 states that Horizon will establish an internal Welsh Language Management Group from commencement until the end of the operational period, which will:</p> <p>(a) provide internal oversight of the Developer's Welsh language commitments and performance including its Welsh Language Policy; and</p> <p>(b) to assist the Welsh Language and Culture Coordinator in the delivery of the Welsh Language and Culture Mitigation and Enhancement Strategy.</p> <p>Schedule 1 clause 10 of the draft DCO s.106 (shared with IACC and Welsh Government on 23.01.19) states that Horizon and the IACC agree to constitute a Welsh Language and Culture Engagement Group. Schedule 1, clause 10.2 provides details of the membership of the group and independent chairmanship (funded by Horizon).</p> <p>Schedule 1 clause 10.3 of the draft DCO s.106 (shared with IACC and Welsh Government on 23.01.19) sets out the duties and responsibilities of the Welsh Language and Culture Engagement Group. These include monitoring the obligations set out in Schedule 1 of the Draft DCO s.106 in relation to Welsh language and culture, review monitoring responses and provide feedback to Parties on issues relating to Welsh language and culture. Timescales for monitoring and reporting to the Welsh Language and Culture Sub-Group are set out in Schedule 1, clause 10.4 of the Draft DCO s.106.</p> <p>Schedule 1 clause 9.2 of the draft DCO s.106 (shared with IACC and Welsh Government on 23.01.19) provides a commitment that Horizon, prior to implementation of the Wylfa Newydd DCO Project, will agree parameters for an annual evaluation of the impact of the Wylfa Newydd DCO Project on the Welsh language in the KSA. Horizon will thereafter undertake that annual evaluation in accordance with the approved parameters for the duration of the construction phase up to five years from the start of the operational period.</p>	Ongoing	IACC to consider whether they are content with amendments made to Draft DCO s.106 (shared 23.01.19).

Topic	Sub topic	Issue	SoCG ID	Document Reference/Sign post/Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
ECONOMIC DEVELOPMENT AND SUPPLY CHAIN								
Economic Development and Supply Chain	Supply Chain	Supply Chain Action Plan	IACC 0082	<p>Volume C Chapter C1 of the Environmental Statement (APP-088)</p> <p>Mitigation Route Map (REP2-038)</p> <p>Draft DCO s.106 agreement</p>	IACC welcomes the developments on the supply chain side and recognises Horizon's engagement locally. IACC wish to see further progress on the Action Plan to allow them to understand how the benefits will be realised locally. This matter cannot be agreed until the SCAP has been further developed.	<p>Horizon is committed to working with the IACC and other partners to develop the Supply Chain Action Plan (SCAP).</p> <p>Horizon has accepted that IACC and others are unlikely to agree the SCAP prior to the s.106 being finalised. As such the draft s.106 agreement (issued on 23.01.19) has been amended to provide a framework for the SCAP, with a post agreement approval mechanism to deliver a final SCAP prior to implementation. It is proposed that the final SCAP will include key performance indicators (KPIs), the key KPI for Horizon being achieving 2000 home based workers at peak.</p>	Ongoing	IACC to confirm if measures in S106 satisfy outstanding concerns
		Supply Chain Action Plan	IACC 0083	<p>Volume C Chapter C1 of the Environmental Statement (APP-088)</p> <p>Mitigation Route Map (REP2-038)</p> <p>Draft DCO s.106 agreement</p>	<p>It is agreed that the SCAP must include consideration of sequencing with other projects which could maximise the positive opportunities locally and seek to minimise the potential for peaks and troughs in activity.</p> <p>The draft DCO s.106 agreement sets out how the SCAP will be developed with IACC, in consultation with the Welsh Government.</p>		Ongoing	IACC have indicated that this matter is ongoing until the SCAP has been agreed
		KPI process	IACC 0084	See 'monitoring' below	<p>It is agreed that Key Performance Indicators (KPI) will be used to monitor and measure the success or otherwise of the Supply Chain Action Plan and facilitate the management of the activities within it.</p> <p>KPIs will be agreed through the development of the SCAP with IACC in consultation with the Welsh Government. This is secured in schedule 4 of the revised draft s106 agreement issued 23.1.19.</p>		Agreed	No further action



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		Supply Chain Sub-Group	IACC 0085	Volume C Chapter C1 of the Environmental Statement (APP-088)  Mitigation Route Map (REP2-038)  Draft DCO s.106 agreement	With the restructuring of the draft DCO s.106 agreement as described above including the direct involvement of the IACC in developing the final SCAP (and subsequent reviews of it), in consultation with the Welsh Government, it is not considered that a Supply Chain Engagement Group is necessary.		Ongoing	IACC to confirm if they are content with this position
	Local employment	Method / Assessment	IACC 0086	Volume C Chapter C3 of the Environmental Statement (Examination Reference Number APP-090)  Jobs and Skills Strategy (APP-411)  Draft DCO s.106 agreement	IACC wishes to see local employment at higher than the previous 2,700 (25%) level not decreasing to 2,000 (22%). No evidence has been provided to justify why this already low figure has decreased. A higher figure is entirely achievable with a greater commitment towards training and equipping local people to be part of the labour pool. Had the percentage of local jobs in the project remained fixed at PAC2 levels, the local share of the new workforce jobs profile would have been closer to 30% which in itself is closer to the target set for Hinkley Point C (34%).	The 2,000 home-based worker number is an assessment estimate, not a target. It has been reduced from 2,700 because the number of roles which are likely to be home-based has been reduced as a result of changes in the construction of the project, including a reduction in the overall number of workers anticipated to be required to construct the Wylfa Newydd Project.  Horizon considers that the Jobs and Skills Implementation Plan, funded by the Jobs and Skills Contribution and the SCAP (secured through the draft S106 agreement) will allow the Wylfa Newydd DCO Project to meet, and potentially exceed, the 22% estimate of home-based workers.	Ongoing	IACC to confirm if measures in S106 satisfy outstanding concerns
	Mitigation	Job Opportunities	IACC 0087	Jobs and Skills Strategy (APP-411)  Draft s.106 agreement	It is agreed that IACC and Horizon will work together to identify opportunities from higher level managerial and professional through to support functions that would be potentially available for local people.  Work on the Jobs and Skills Implementation plan (JSIP) was progressed through the Jobs and Skills working group. An advanced JSIP was prepared however Horizon has accepted that IACC and others are unlikely to agree the JSIP plans prior to the s.106 being finalised. As such the draft s.106 agreement has been amended to provide a framework for the JSIP, with a post agreement approval mechanism to deliver a final JSIP. The final JSIP will include key performance indicators (KPIs), the key KPI for Horizon being achieving 2000 home based workers at peak. The Jobs and Skills Working Group, which is to be constituted under the s106 agreement, will input into the final JSIP Working Group.  The final JSIP is intended to reflect the priorities set out in the Jobs and Skills Strategy, including a total trade breakdown and the construction workforce profile. The JSIP will identify specific actions for Years 1-3 of the construction project and be reviewed and updated over time.  Horizon is working with Welsh Government, the Department for Work and Pensions and other stakeholders to develop a Wylfa Newydd Employment and Skills Service (WNESS). Its role will be to place people into sustainable employment created by the building of the Wylfa Newydd Power Station and the construction of its Associated Developments. Horizon will also consider extending the model in the future to include the employment of operational staff, subject to monitoring and evaluation of the effectiveness of the WNESS.		Ongoing	IACC to confirm if measures in S106 satisfy outstanding concerns

Topic	Sub topic	Issue	SoCG ID	Document Reference/Sign post/Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
					One of the remits of the WNESS is to provide employment opportunities for residents of Anglesey and North Wales.			
	Mitigation	Knowledge exchange / careers advice	IACC 0088	Mitigation Route Map (REP2-038)  Draft s.106 agreement	It is agreed that Horizon will support STEM programmes, and ready career development programmes, in schools, through the Education Strategy committed to in schedule 6 of the draft s.106 agreement. This would build on the existing work which Horizon has done in the past, for example as shown on: <a href="https://www.horizonnuclearpower.com/education">https://www.horizonnuclearpower.com/education</a>		Agreed	No further action
	Mitigation	Additional places in education	IACC 0089	Mitigation Route Map (REP2-038)  Draft DCO s.106 agreement	It is agreed that Horizon will provide an Education Fund which could, amongst other things, generate additional places for STEM subjects. Part of this fund would be payable on implementation and could be used to fund early places in education. The revised draft s106 agreement proposes an Education Strategy is developed by the Council to allocate the educating funding.		Agreed	No further action
	Mitigation	Tracking school Leavers and graduates	IACC 0090	Jobs and Skills Implementation Plan and Education Strategy (secured through draft DCO s106)	Horizon is happy to commit to this in principle and proposes that it works with Careers Wales on this. Horizon will work with other members of the Jobs and Skills Working Group to develop this further.		Agreed	No further action
	Mitigation	Maximising local employment at Wylfa Newydd	IACC 0091	Draft DCO s.106 agreement	<p>Horizon is completely committed to the principle of maximising local employment and opportunities and recognises the benefits, both to Anglesey and North Wales, but also to the project, of maintaining a strong, sustainable local workforce.</p> <p>The positive steps that Horizon is taking to achieve this are set out in the Jobs and Skills Strategy and secured in the s106 agreement and Horizon is also happy to work with IACC and other key economic stakeholders, e.g. NWEAB, on other ways that this positive commitment can be promoted.</p>		Ongoing	IACC to confirm if measures in S106 satisfy outstanding concerns
	Mitigation	Supply Chain Portal	IACC 0092	Draft DCO s.106 agreement	<p>Horizon has committed to this in the DCO application and it is be secured in schedule 4 of the S106 agreement.</p> <p>The draft S106 includes the following commitment:</p> <p>“The Developer undertakes that it will operate and maintain the Supply Chain Portal in accordance with the Supply Chain Action Plan during the Construction Period (or such other period agreed between the Developer and the Council).”</p> <p>Development of the SCAP is set out above.</p>		Agreed	No further action
	Mitigation	Supply Chain Officer	IACC 0093	Draft DCO s.106 agreement	<p>The draft S.106 includes payment for two IACC Economic Development Officers whose role would be to:</p> <ul style="list-style-type: none"><li>represent the Council and local businesses in engaging with Developer's supply chain in respect of the Development;</li><li>work with the Developer in engaging the STEM Pathfinder Project with the Development;</li><li>engage with the WNESS and the Supply Chain Service Working Group on behalf of the Council;</li><li>liaise with potential inward investors and supply chain related businesses to identify barriers and opportunities to realising economic growth and/or benefits within the Council areas; and</li><li>monitor the operation and effectiveness of the Supply Chain Portal.</li></ul>		Agreed	No further action



Topic	Sub topic	Issue	SoCG ID	Document Reference/Sign post/Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
					The revised draft s.106 agreement issued 23.1.19 also proposes that Horizon appoint an internal contact to work with the external EDOs to ensure a joined up approach to supply chain.			
	Labour displacement	Method / Assessment	IACC 0094	Volume C Chapter C1 of the Environmental Statement (APP-088)	IACC and Horizon recognised that the approach to analysis is compliant with guidelines. Further consideration of the implications of the different scenarios is required. To support this Horizon to provide IACC with the MACE skills requirements report.		Agreed	No further action
		Skills and Experience	IACC 0095	Jobs and Skills Strategy (APP-411)  Draft DCO s.106 agreement	IACC considers that insufficient information has been provided so far on how it intends to minimise labour displacement. The IACC considers that specific information that specifies what skills and experience are required for each job type to allow an analysis against the Anglesey population to be undertaken.	Revised commitments to developing a final JSIP with the Council have now been set out in the revised draft s.106 agreement issued 23.1.19. This will include identifying KPIs	Ongoing	IACC to confirm if measures in S106 satisfy outstanding concerns
	Employment and Skills	KPI process	IACC 0096	See 'monitoring' below	IACC recognised that the proposed working group process will facilitate the identification of appropriate KPIs	Revised commitments to developing a final JSIP with the Council have now been set out in the revised draft s.106 agreement issued 23.1.19. This will include identifying KPIs	Ongoing	IACC to confirm if measures in S106 satisfy outstanding concerns
		KPIs	IACC 0097	See 'monitoring' below	IACC agreed these were required to enable the monitoring and management of local outcomes.	Revised commitments to developing a final JSIP with the Council have now been set out in the revised draft s.106 agreement issued 23.1.19. This will include identifying KPIs	Ongoing	IACC to confirm if measures in S106 satisfy outstanding concerns
	Monitoring	Monitoring of Effects	IACC 0098	Mitigation Route Map (REP2-038)  Draft s.106 agreement	The revised draft s.106 agreement issued 23.1.19. includes commitments to a Jobs and Skills Working Group (and other engagement groups) which will have a key role in monitoring		Agreed	No further action
	Monitoring	Role Monitoring	IACC 0099	Mitigation Route Map (REP2-038)  Draft s.106 agreement	It is agreed that Horizon will commit in principle to monitoring which roles in the Supply Chain are hard to fill - monitoring and reporting by Horizon is required under the revised draft s106 agreement in schedule 4. Work on skills gaps generally has already been carried out by the Department of Work and Pensions in partnership with the Construction Industry Training Board and is being used to inform the work being carried out by the Wylfa Newydd Employment and Skills Service (WNESS).		Agreed	No further action
	Funding	Funding to address effects	IACC 0100	Mitigation Route Map (REP2-038)  Draft s.106 agreement	A £10 million pound Jobs and Skills contribution is committed to in the .s.106 agreement. Additionally, a remedial action plan process is set up, with access to a £2 Million contingency fund, if KPIs established in the JSIP are not being met.  Horizon considers this is robust and appropriate funding and mitigation.		Ongoing	Discussions on the quantum and application of the fund are ongoing through work on the draft

Topic	Sub topic	Issue	SoCG ID	Document Reference/Sign post/Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
								S106 agreement
		Supply Chain Fund	IACC 0101	Draft s.106 agreement	There should be a Flexible Supply Chain Fund as per IACC's LIR Supply Chain Chapter 4.	<p>Horizon is not proposing a separate Supply Chain Fund. Jobs and Skills contribution would be available to spend on initiatives for upskilling of existing construction workers in the local area to enable them to access the employment opportunities for the Project.</p> <p>The Supply Chain Action Plan will also include measures for ensuring that local firms can compete for the opportunities created by the Project. It is not considered appropriate to then go further and also provide funds for them to develop premises. Horizon's strategy is to enable local firms to proactively compete, supporting them to help themselves, rather than direct commercial support.</p> <p>In addition Welsh Government will be supporting some Supply Chain activity facilitation/enabling e.g. Busnes Cymru – this is a 'team public and private sector' approach to Supply Chain.</p>	Ongoing	IACC to confirm if measures in S106 satisfy outstanding concerns

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Topic	Sub topic	Issue	SoCG ID	Document Reference/Sign post/Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
TOURISM								
Tourism	Method	Importance of the tourism industry	IACC 0102	<p>Chapter C1 (Project-wide effects – Socio-economics) (APP-088).</p> <p>Appendix C1-2 (Socio-economic Technical Appendix) (APP-096)</p>	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).		Agreed	No further action
	Method	Scope of Assessment	IACC 0103	<p>Chapter C1 (Project-wide effects – Socio-economics) (APP-088).</p> <p>Appendix C1-2 (Socio-</p>	It was Horizons understanding that the scope of the assessment was agreed, however IACC have recently indicated that because the IACC does not agree with the predicted impacts on tourism, the scope of the assessment is not agreed.		Not agreed	No further action

Topic	Sub topic	Issue	SoCG ID	Document Reference/Sign post/Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
				economic Technical Appendix) (APP-096)				
	Baseline and Data Collection	Visitor Behaviour Study (VBS) 2015	IACC 0104	Chapter C1 (Project-wide effects – Socio-economics) (APP-088).  Appendix C1-2 (Socio-economic Technical Appendix) (APP-096)	It is Horizon's position that it had been agreed until recently between both parties that the Visitor Behaviour Survey (2015) was the best available evidence base on which to carry out the assessment of tourism effects of the Project. However, IACC have recently indicated that they are not in agreement with the use of VBS to support the tourism assessment.		Not agreed	No further action
		Visitor Behaviour Study (VBS) 2018	IACC 0105	Chapter C1 (Project-wide effects – Socio-economics) (APP-088).  Appendix C1-2 (Socio-economic Technical Appendix) (APP-096)  Horizon response to the Local Impact Report (REP3-004).	IACC have outlined their position in the Local Impact Report.	Horizon's current position is confirmed within the Chapter C1 (Project-wide effects – Socio-economics) (APP-088) and Horizon's response to the Local Impact Report [REP3-004]	Ongoing	Further discussions required on use of updated VBS
		Baseline capacity of tourism stock	IACC 0106	Chapter C1 (Project-wide effects – Socio-economics) (APP-088). Appendix C1-2 (Socio-economic Technical Appendix) (APP-096)	IACC have outlined their position in the Local Impact Report.	Horizon's current position is confirmed within the Chapter C1 (Project-wide effects – Socio-economics) (APP-088) and Horizon's response to the Local Impact Report (REP3-004)	Not agreed	The baseline capacity is not agreed, but the focus is now on discussing appropriate mitigation through discussions on the S106 agreement

Topic	Sub topic	Issue	SoCG ID	Document Reference/Sign post/Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
		Availability of tourism stock for Wylfa Newydd workers	IACC 0107	Chapter C1 (Project-wide effects – Socio-economics) (APP-088). Appendix C1-2 (Socio-economic Technical Appendix) (APP-096)	IACC have raised queries in relation to the availability of tourism stock for Wylfa Newydd workers. Their concern is that the use of any tourism accommodation by workers could impact negatively on the tourism economy on the island or contribute to the downgrading of the quality of accommodation. IACC has identified the level of tourism stock that they consider could be used to accommodate workers in their Local Impact Report, with specific concerns raised around caravan capacity.	Horizon's current position is confirmed within the Chapter C1 (Project-wide effects – Socio-economics) (APP-088). This assumes that 450 bed spaces within the KSA could be potentially occupied by Wylfa Newydd workers, which would equate to 14% of the available headroom in the August peak season according to Horizon's assessment. Chapter C1 states: <i>“An estimated 450 bed spaces would be expected to come from the tourist accommodation stock at peak construction. There is not expected to be a significant effect on the availability of tourism accommodation within the KSA, as it is estimated that there are approximately 3,100 available bed spaces in this stock (table C1-10). The demand from workers for these bed spaces is short-term and temporary. The estimates of headroom are based on the available capacity above that used by tourists and visitors in the August peak of the tourism season.”</i> Further to this Horizon has responded on caravan capacity concerns within the response to the Local Impact Report [REP3-004].	Not agreed	The availability of tourism capacity is not agreed, but the focus is now on discussing appropriate mitigation through discussions on the S106 agreement
	Assessment	Labour displacement in the tourism sector	IACC 0108	Chapter C1 (Project-wide effects – Socio-economics) (APP-088).	IACC are concerned about the potential for job opportunities provided by the Wylfa Newydd Project to displace jobs within particular sectors, including in the tourism sector.	Horizon have acknowledged that this is a risk, but there is not agreement on the scale of this risk. Horizon agree that the risk of displacement could apply to the tourism industry, as well as the social care and service sectors. Areas of agreement and disagreement on this issue are set in the Economic Development and Supply Chain section of this SOCG. In addition, Horizon have committed to working with training providers to maximise the opportunities provided to use the on-site and site campus catering facilities as training kitchens. The Jobs and Skills Implementation Plan and the WNESS will be available to support the preparation of the workforce to access opportunities and also to support employers with backfilling positions also.	Not agreed	No further action
	Assessment	Significance of effect	IACC 0109	Chapter C1 (Project-wide effects – Socio-economics) (APP-088).	IACC consider that Horizon's assessment of effects under-estimates the effect of the Wylfa Newydd Project on the tourism industry.  There is a significant threat to the quality and viability of the Island's tourism accommodation base, which in turn will have substantial negative impacts on local tourism attractions, operators, etc. The main threat lies in the loss of capacity and quality as accommodation is used by construction workers. The nature and distribution of bed-spaces, the pricing mis-match between worker demands and existing provision, licensing, site restrictions, the impracticality of accommodating visitor and construction workers on the same sites and owner appetites for letting to construction workers, are all issues requiring more work to fully understand the complete extent of the impact. Moreover, the use of 'bed-spaces' as the unit of	Horizon's assessment on the effect of the Wylfa Newydd Project on tourism is set out in Chapter C1 of the Environmental Statement. No significant effects are anticipated on the tourism industry, including quality of accommodation and visitor numbers during construction or operation of the Wylfa Newydd Project. However, due to the uncertainty of the precise effects on the tourism brand, which could be moderate in EIA terms, Horizon is proposing significant funding through the Tourism Fund to support the sector locally and reduce the risk of such effect arising (see later in this table).	Not agreed	No further action

Topic	Sub topic	Issue	SoCG ID	Document Reference/Sign post/Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
					analysis underestimates both the level and the complexity of demand.			
		Value of Coastal Path	IACC 0110	Chapter C3, Public Access and Recreation of Traffic, and D4, Public Access and Recreation ( APP-090 and APP-123 respectively)	The IACC's position is that diverting a section of the coastal path inland could result in a loss of value.	Horizon's position is that whilst the concern is recognised, there would be no loss in value of the route to the local or regional economy.  Mitigation relating to the Wales Coast Path is agreed and is confirmed later in this table in the section on mitigation.	Not Agreed	No further action
	Mitigation	Tourism Fund	IACC 0111	Drafts s.106 agreement (Deadline 5 submission version)	IACC support the provision of the Tourism Fund but seek more clarity on the level of, and how it will be delivered and measured.	Horizon will provide a Tourism Fund to address any material effects which could arise on the sector as a result of the Wylfa Newydd DCO Project.  In terms of early delivery of funding, Horizon has committed to providing an early contribution of £125,000 for tourism prior to commencement, before the more substantive payments are released on implementation of the agreement. This early funding is secured in the revised s.106 agreement (issued 23.01.19) in schedule 15.  In addition the draft revised s.106 agreement (issued 23.01.19) has set out a package of just under £2.5 million in Tourism contributions.  This is supported by new obligation requiring preparation of a Tourism Action Plan led by the Council which will guide the expenditure of the tourism fund.  Finally Horizon has committed under the revised draft s.106 agreement to the early delivery of a Visitor centre. This is a multi-million pound in kind cost to Horizon..	Ongoing	Further discussions required on the draft S106 agreement
		Phased approach to delivery of Site Campus	IACC 0112	Phasing Strategy (REP4-015)	IACC have requested that the Site Campus is delivered as early as possible to help to mitigate impacts on the tourism sector, amongst other things. Horizon has agreed to the principle of delivering the Site Campus as soon as possible and the committed delivery/phasing of the Site Campus is set out in the Phasing Strategy [REP4-015]. The rationale for why the Site Campus cannot be provided earlier is set out in document REP4-007.		Ongoing	Further discussions required
		Temporary and Permanent Visitors Centre	IACC 0113	Chapter D1 – Proposed Development (APP-120) Draft s.106 agreement	IACC agree with the principle of the provision of a Temporary Visitors Centre but disagree with this only being a viewing area. IACC would also be seeking a temporary facility for people visiting the construction site.	Horizon has committed under the revised draft DCO s.106 agreement to the early delivery of a Visitor Centre. Horizon is now committed to early delivery of the permanent Visitor Centre for the Wylfa Newydd Project. The Visitor Centre will be committed to in the Section 106 Legal Agreement however will be developed following a separate TCPA application for planning permission to IACC.	Ongoing	Further discussions required on draft S106 agreement



Topic	Sub topic	Issue	SoCG ID	Document Reference/Sign post/Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
				(Deadline 5 version)				
		Wales Coast Path	IACC 0114	The revised Overarching Code of Construction Practice (CoCP) to be submitted to PINS at DL5 (N/A) and Draft s.106 agreement (N/A)	<p>Whilst IACC considers that the assessment under-estimates the value of the Wales Coast Path, it agrees that there is no alternative to diverting the path given the location of the Power Station adjacent to the coast.</p> <p>It is agreed that this impact would be mitigated through contributions to improve the public right of way network within the vicinity of the Wylfa Newydd Development Area, adjoin the A5025 between Valley and Tregele, and/or improvements elsewhere on the Wales Coast Path on Anglesey. The IACC are of the view that compensatory measures are required for the impact on the WCP.</p>		Ongoing	Marked as ongoing until have had further discussions on compensation through draft S106 agreement
		Copper Trail	IACC 0115	The revised Overarching Code of Construction Practice (CoCP) to be submitted to PINS at DL5 (N/A) and Draft s.106 agreement	<p>Effects on cyclists using the Copper Trail would not be significant during construction or operation (minor adverse). However, the proposed measures would further help to lessen the reduction in recreational amenity experienced.</p> <p>Horizon is proposing that contributions be secured through S106 to implement mitigation measures for the closure of Cemlyn Road on the Copper Trail, which can be used to facilitate a range of measures including:</p> <ul style="list-style-type: none"><li>new leaflets, awareness, marketing and signage.</li><li>improvements to the signage of the Copper Trail at other locations along its route;</li><li>improvements to other cycle signage in the vicinity of the Wylfa Newydd DCO Project with a focus on the area between Cemlyn Bay and Llanfechell; and</li><li>other Copper trail related marketing and promotion events.</li></ul>		Agreed	No further action

Topic	Sub topic	Issue	SoCG ID	Document Reference/ Signpost/ Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
TRANSPORT AND INFRASTRUCTURE								
Transport	Overarching Strategy	Integrated Traffic and Transport Strategy (ITTS)	IACC 0116	<p>Appendix F of the Transport Assessment (provided at Appendix C2.04 of the Environmental Statement) (APP-107)</p> <p>Overarching Code of Construction Practice (CoCP) (Deadline 5 version)</p>	<p>The IACC support the ITTS in principle, in particular the aim of reducing vehicle trips as far as possible and aiming to limit the impact on transport infrastructure. However, the IACC has concerns about the detailed implementation of the ITTS, in particular the reliance on car sharing. Further details are provided to each issue below. Provided the improvements to the A5025 are implemented, monitoring and enforcement will be required to ensure that workers, delivery drivers etc. use this designated route (i.e. no use of 'rat runs' and unsuitable routes).</p> <p>IACC notes Horizon's proposals but does not agree that they will be effective.</p>	<p>Horizon is confident that The proposed controls within the WN CoCP and the sub-CoCPs (Deadline 5 version-036) and further amendments to come at Deadline 5 to these documents, will keep traffic impacts to a minimum and to an acceptable level as required by the NPS's.</p> <p>The CoCP (Deadline 5 version) contains measures to manage traffic impacts during construction, including how car sharing will work, with a target of 2.0 construction workers per vehicle in the peak year of construction, the bus strategy, commitment to monitoring issues report by the public and stakeholders, (such as 'rat-running'). Further details, including recent changes to the CoCP and further changes to come at Deadline 5, are provided below.</p>	Ongoing	Horizon's view is that IACC's outstanding concerns are addressed by the CoCP, but this has not been confirmed by IACC.



Topic	Sub topic	Issue	SoCG ID	Document Reference/ Signpost/ Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
						<p>Regarding rat-running concerns, a change was made to the CoCP at Deadline 2 (Deadline 5 version) stating that the Code of Conduct will include a clause requiring construction workers to stick to 'A' class roads and avoid 'B' class roads wherever practicable to avoid causing unnecessary nuisance and disturbance to local communities. This statement is to be further clarified in the next version of the CoCP to be submitted at Deadline 5 to include 'C' class and Unclassified roads in the roads to avoid.</p> <p>Locals residents and stakeholders will be able to report issues associated with the use of unsuitable roads to the Transport Engagement Group which is proposed to manage and monitor traffic and transport issues for the Wylfa Newydd Project. IACC is proposed to be a member of this Transport Engagement Group which will have access to funds to undertake surveys and potentially implement management measures. The remit of this Transport Engagement Group is currently being discussed with IACC, and it will be constituted under the s.106 agreement.</p> <p>The next version of the CoCP submitted at Deadline 5 is also to be updated with mode share targets and early years bus strategy as set out in the 'Proposed Travel Strategy Monitoring' note published and sent to IACC on the 25th January 2019.</p> <p>Further changes to be included in the next version of the CoCP include:</p> <ul style="list-style-type: none"><li>• More detail on how construction traffic will be managed, including AILs</li><li>• More detail on how traffic impacts will be monitored</li><li>• More detail on enforcement</li></ul>		
		Monitoring	IACC 0117	Appendix F of the Transport Assessment (provided at Appendix C2.04 of the Environmental Statement) (APP-107)  Overarching Code of Construction Practice (CoCP) (Deadline 5 version)	<p>The following is agreed:</p> <p>Monitoring the usage and condition of Class II, III and Unclassified roads is not something that will be implemented. If local communities suspect Horizon construction worker related traffic is using unsuitable routes to/from the WNDA, they can report the car registration plates to the hotline and/or e-mail address which will be set up and advertised to the public. If the car is registered to a Wylfa Newydd construction worker then appropriate action will be taken with that worker as it would be a breach in the code of Code of Conduct if they have used an inappropriate route to/from the WNDA.</p> <p>Local residents and stakeholders will also be able to report issues associated with the use of unsuitable roads to the Transport Engagement Group which is proposed to manage and monitor traffic and transport issues for the Wylfa Newydd Project. IACC will be a member of this Transport Engagement Group. The revised draft s.106 agreement (issued 23.01.19) proposes that IACC and WG would have access to funds to undertake road surface surveys and potentially implement management measures, on consultation with the Transport Engagement Group..</p> <p>Note however if any workers live in rural locations and drive to the WNDA, it may be unavoidable to use a Class II, III or other unclassified road for part of their journey to/from the WNDA. In such circumstances, this would not be classed as a breach of the Code of Conduct.</p>		Agreed	No further action

Topic	Sub topic	Issue	SoCG ID	Document Reference/ Signpost/ Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
					<p>More information on what will be monitored and how is included in the 'Proposed Travel Strategy Monitoring' note published and sent to IACC on the 25<sup>th</sup> January 2019.</p> <p>The scope of the highway network to be subject to Highway condition surveys has now been agreed and is dealt with in other items in this document, and secured in the s.106 agreement.</p> <p>The IACC would also note this issue is dependent on sufficient funding being secured in the Transport schedule of the S.106.</p>			
		Construction Worker Strategy (Car Sharing for construction workers)	IACC 0118	<p>Appendix F of the Transport Assessment (provided at Appendix C2.04 of the Environmental Statement) (APP-107)</p> <p>Overarching Code of Construction Practice (CoCP) (Deadline 5 version)</p> <p>Workforce Management Strategy (APP-413)</p>	<p>IACC's position is that the principle of car sharing and providing a Park and Ride facility on the island is welcomed. However, it is still of the opinion that Horizon should provide Park and Share (P&amp;S) facilities at strategic locations which would assist in promoting more sustainable travel patterns to the Wylfa Newydd site and Park &amp; Ride facility, as well as provide resilience, flexibility and a contingency provision to Horizon's Strategy.</p> <p>IACC believes Horizon's assumption of workers driving or walking to another workers' place of residence to car share is unrealistic, with workers likely to make informal arrangements (or formally via the database) to meet each near the A55/A5025/A487 corridor to car share the onwards journey. The geographic distribution of the workforce estimated by Horizon's gravity model, the proposed shift patters and the churn of workers over the construction period of Wylfa Newydd continues to support the justification for Park and Share facilities.</p> <p>IACC to review revised CoCP before assessing whether the item is agreed or not.</p>	<p>Horizon's position is that evidence contained within the Transport Assessment demonstrates that the provision of a Park &amp; Ride facility for 1,900 cars, and on-site parking for 1,900 cars (including 311 as contingency), and other travel management measures, provides an appropriate strategy to meet the requirements of the Project and mitigate impacts. The evidence provided in the Transport Assessment does not identify the need for additional Park and Share facilities.The following statement will be included in the next version of the CoCP:</p> <p>Horizon is confident that its DCO application contains all of the necessary parking (onsite and at Dalar Hir) to meet the requirements of the Wylfa Newydd DCO Project and minimise the traffic and transport impacts. However, Horizon will consider the use of the proposed Park and Share facilities (including as stops on the shuttle bus network, where demand exists) at Four Crosses, Gaerwen, Bangor and Caernarfon, on the basis that these Park and Share facilities are delivered by others, as a complementary component of the transport strategy for the Wylfa Newydd Project The principles within the Workforce Management Strategy (APP-413) also state that 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.</p> <p>The CoCP contains measures to manage traffic impacts during construction, including how car sharing will work, with a target of 2.0 construction workers per vehicle in the peak year of construction,</p> <p>The next version of the CoCP is also to be updated with mode share targets and early years bus strategy as set out in the 'Proposed Travel Strategy Monitoring' note published and sent to IACC on the 25th January 2019.</p>	Ongoing	Horizon's view is that IACC's outstanding concerns are addressed by the CoCP, but this has not been confirmed by IACC
		Early Years Strategy	IACC 0119	Volume C Chapter C2.04 of the Environmental Statement (APP-101)	The IACC has consistently and repeatedly emphasised the need for an Early Years Strategy (the construction period for the Associated Developments, MOLF, A5025 improvements, Site Campus Phase 1, Site Grading, Earthworks and Excavations) which sets out the management and planning of construction traffic movements. Consideration shall also be	As the Park and Ride, MOLF, Logistics Centre and Site Campus are key mitigation, the Phasing Strategy [REP4-015] provides time-bound commitments as to when Horizon will deliver each item.	Not Agreed	Further discussion required between Horizon and IACC

Topic	Sub topic	Issue	SoCG ID	Document Reference/ Signpost/ Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
				<p>Phasing Strategy (APP-447)</p> <p>Appendix F of the Transport Assessment (provided at Appendix C2.04 of the Environmental Statement) (APP-107)</p>	<p>required for scenarios whereby there is a delay to the construction/completion of such components as, but not limited to:-</p> <ul style="list-style-type: none"><li>• The A5025 On-line Highway improvements;</li><li>• The A5025 Off-line Highway improvements;</li><li>• The Marine Off-Loading Facility (MOLF);</li><li>• Dalar Hir Park &amp; Ride; and</li><li>• Parc Cybi Logistics Centre.</li></ul> <p>To avoid this potential impact, Horizon should undertake Sensitivity Analysis to identify traffic volumes and impacts during different stages of the Wylfa Newydd early years construction period (i.e. pre-MOLF). From this analysis, the IACC seeks to agree upon acceptable volumetric thresholds/caps for maximum traffic levels along the A5025 for the early stages of the project. Such thresholds/caps would ensure that Heavy Duty Vehicle (HGV and Shuttle Bus) traffic would not introduce unacceptable levels of congestion, delay and undue environmental impact on sensitive receptors.</p>	<p>The Transport Assessment (APP-101) considers a robust and conservative scenario assessing when road traffic movements are at their highest, including providing assessment of the early years (2020) both with and without the A5025 Off-Line Highway Improvements. The Park and Ride Facility could open in stages to enable it to be used as soon as possible in the construction programme.</p> <p>It is important to note that by assessing 60% of all freight deliveries via the Marine Off-Loading Facility (MOLF) and therefore 40% by road, Horizon has assessed double the number of HGVs that is expected given the target is 80% via the MOLF and 20% via road.</p> <p>It should be noted that it is assumed that delays to the delivery of the MOLF do not mean that more material would be delivered by road. This is because Horizon is committed (via the CoCP) to constructing the Wylfa Newydd Project within the traffic levels and the split of material to be delivered by MOLF and by road as assessed in the DCO application with traffic limits specified in section 5 of the Wylfa Newydd CoCP [Deadline 5 version]. The next version of the CoCP submitted at Deadline 5 will also include lower HGV caps in the early years (before the Off-Line Highway Improvement Works are complete) as follows:</p> <ul style="list-style-type: none"><li>○ 2,500 per month per direction</li><li>○ 160 per day per direction</li><li>○ 22 per hour per direction</li></ul> <p>The Logistics Centre sub-CoCP is to be amended to state the following: “If the delivery of the Logistics Centre is delayed beyond the date specified in the Phasing Strategy, Horizon would work with the Isle of Anglesey County Council to identify suitable alternative traffic management arrangements which would provide similar beneficial facilities to the proposed Logistics Centre until the Logistics Centre opens.”</p>		
			IACC 0120	<p>Volume C Chapter C2.04 of the Environmental Statement (APP-101)</p> <p>Phasing Strategy (REP4-015)</p> <p>Appendix F of the Transport Assessment</p>	<p>Horizon have agreed to work together with IACC to provide improvement works to the existing carriageway within Llanfachreath, in the form of repair works to the surface course and incorporate adjustment of manhole covers and gully gratings where necessary. The extents and scope of the repair works required through Llanfachreath will be agreed following a joint inspection between IACC highways Officers and Horizon Representatives prior to commencement of the project. This is secured in the draft revised s.106 agreement.</p>		Agreed	No further action

Topic	Sub topic	Issue	SoCG ID	Document Reference/ Signpost/ Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
				(provided at Appendix C2.04 of the Environmental Statement) (APP-107)  Draft s106 agreement				
			IACC 0121	Volume C Chapter C2.04 of the Environmental Statement (APP-101)  Phasing Strategy (REP4-015)	<p>To-date, Horizon have not demonstrated with clarity how the:</p> <ul style="list-style-type: none"><li>• The A5025 On-line Highway improvements;</li><li>• The A5025 Off-line Highway improvements;</li><li>• The Marine Off-Loading Facility (MOLF);</li><li>• Dalar Hir Park &amp; Ride; and</li><li>• Parc Cybi Logistics Centre</li></ul> <p>will be programmed/constructed in order to ensure the Project:-</p> <p>a) Does not have a negative impact on the existing condition of the A5025 (or any other road) prior to the A5025 online and offline improvements</p> <p>b) Avoid the potential significant disruption to local residents and its construction programme.</p> <p>c) Does not impact upon the highway network during any overlap with other NSIP (i.e. North Wales Connection Project).</p> <p>The IACC notes that this issue does not relate to HGV caps on the A5025 during the Early Years, which is addressed in SoCG ID 0115</p>	<p>a) The A5025 On-Line Highway Improvements have been approved under separate consent and do not form part of the DCO application. However, Horizon is committed to resurface Sections 1,3,5,and 7, and provide completely new highway for sections 2,4,6 and 8 of the A5025. There are no proposals to improve the surface of the A5025 between the proposed Power Station Access Road Junction and the existing Power Station entrance. It is Horizon's intention to conduct surveys of this section of the A5025, jointly with IACC, in order to evaluate the condition of the carriageway to identify. what improvements are necessary , including appropriate timing of these works. The extents of the repair works will be agreed between IACC Highways and Horizon. This is secured in the draft revised s.106 agreement.</p> <p>b) Some disruption to the A5025 is inevitable during the construction of the A5025 Off-Line Highway Works. All efforts will be made to minimise impacts during construction of these important mitigation measures. The magnitude of these impacts in terms of noise, air quality impacts etc are described in the Environmental Statement for the Wylfa Newydd Project.</p> <p>c) The potential for overlap with works associated with the North Wales Connection has been considered as part of the transport analysis of the Wylfa Newydd Project (see paragraphs 5.3.2 to 5.3.4 and Appendix L of the Transport Assessment). Horizon is in regular discussions with the National Grid concerning the Projects and this is expected to continue to manage the delivery of the two projects where they overlap. In terms of the overlap on the A5025, National Grid traffic is not proposed to use the A5025 until after the Off-Line Highway Improvement Works are open based on current programme.</p>	Ongoing	The final extents of the condition surveys will be agreed between IACC Highways and Horizon.
			IACC 0122	Volume C Chapter C2.04 of the Environmental Statement (APP-101)	The IACC has further concerns that Horizon might increase the number of HGV movements (daily or monthly) on the road network in an attempt to recover any programme delay. Such a scenario is currently evident at HPC, whereby the developer recently applied to uplift the quarterly maximum 500no HGV movements by 50% as a result of a delay to the delivery of the	This is not proposed and does not form part of the DCO application. Horizon has committed via the CoCP to capping HGV movements to the levels assessed in the DCO Transport Assessment (40 per hour and 160 per day, per direction, along the A5025) and lower caps (22	Not Agreed	Further discussion required between Horizon and IACC



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				<p>Phasing Strategy (REP4-015)</p> <p>Overarching Code of Construction Practice (CoCP) (Deadline 5 version)</p>	<p>jetty, with the local community raising significant concerns. To avoid this potential impact, Horizon should undertake Sensitivity Analysis to identify traffic volumes and impacts during different stages of the Wylfa Newydd early years construction period (i.e. pre-MOLF). From this analysis, the IACC seeks to agree upon acceptable volumetric thresholds/caps for maximum traffic levels along the A5025 for the early stages of the project. Such thresholds/caps would ensure that Heavy Duty Vehicle (HGV and Shuttle Bus) traffic would not introduce unacceptable levels of congestion, delay and undue environmental impact on sensitive receptors.</p> <p>The Authority considers that the proposed HGV cap of 2,500 One-Way HGV deliveries a month [5,000 Two-Way a month], 160 One-Way HGV deliveries per day [320 Two-Way per day], and 22 One-Way HGV deliveries an hour [44 Two-Way an hour] submitted by HNP for the Early Years is inappropriate and will generate adverse impacts on the local residents and communities. The Authority would consider a maximum 40% increase in HGV traffic above HGV baseline flows a more appropriate cap prior to opening of Off-Line bypasses.</p>	<p>per hour per direction) in the early years – see updated CoCP submitted at Deadline 5.</p> <p>These caps could not be breached without further assessment being undertaken and agreement with IACC in advance. Note that the application at HPC for a temporary increase in the maximum HGV cap was consented successfully with the Local Authorities.</p> <p>The early years have been assessed under two different 2020 scenarios, with and without the A5025 Off-Line Highway Improvements. The results of this assessment are provided in Chapter 11 of the DCO Transport Assessment submitted as part of the application (see Table 11-1 and Table 11-4) Volumetric caps on HGV movements are provided in paragraph 5.4.13 of the CoCP.</p> <p>The CoCP was updated at Deadline 2 [Deadline 5 version] to include lower HGV caps in the early years (prior to the Off-Line Highway Improvement Works being completed) as follows:</p> <ul style="list-style-type: none"><li>2,500 per month per direction</li><li>160 per day per direction</li><li>22 per hour per direction</li></ul>		
		Park and Ride/Car Share Strategy	IACC 0123	<p>Appendix F of the Transport Assessment (provided at Appendix C2.04 of the Environmental Statement) (APP-107)</p> <p>Overarching Code of Construction Practice (CoCP) (Deadline 5 submission version)</p> <p>Design an Access Statement Volume 1-3 (REP4-016-REP4-018)</p>	<p>IACC's position is that further evidence is required to justify the strategy and car share factors along with enforcement and promotion measures that will lead to such factors being achieved. There remains a lack of detail around the car sharing ratio and the monitoring and enforcing of 3 workers per car travelling to site. Horizon states that this is implemented during peak year of construction only, IACC's stance is that this should be enforced throughout the whole construction phase of the project. Reduction of parking spaces from 5,800 (PAC2) to 3,800 (PAC3) does not provide sufficient parking spaces. The proposed increase from 1,000 to 1,900 parking spaces on-site required further detail as to who is allowed to park on site, where will the workers living in the site campus park, will workers living in North Anglesey be expected to travel to Dalar Hir etc.</p> <p>IACC to review revised CoCP before assessing whether the item is agreed or not.</p>	<p>The Overarching WN CoCP (Deadline 5 version) sets out in Section 5 how Horizon will promote car sharing using appropriate methods. The car sharing strategy will be promoted, monitored and managed and enforced by Horizon through its supply chain. The WN CoCP was updated with the following revised text at Deadline 2 [Deadline 5 version] regarding car sharing:</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 Workers Accommodation Portal (secured in the draft s.106 agreement) will be used as a basis to form the database.</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</p>	Ongoing	<p>Horizon's view is that IACC's outstanding concerns are addressed by the CoCP, but this has not been confirmed by IACC.</p>

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						<p>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 to the car-share policy could result in refusal of entry to the WNDA or Park and Ride car parks.”</p> <p>Horizon firmly believes that its car share strategy and target of an average of 2.0 workers per vehicle in the peak year is appropriate and achievable. Paragraph 6.3.13 of the Transport Assessment identifies potential challenges with delivering car sharing at an organisation (e.g. spread of home locations, need for flexibility). Paragraphs 6.3.14 and 6.3.15 then identify why these constraints are less relevant for the Wylfa Newydd Project and why car sharing is more feasible than for a typical development e.g. an office.</p> <p>The Transport Assessment sets out the parking provision. 1,900 spaces are proposed at Dalar Hir and 1,900 spaces proposed at the WNDA). The CoCP contains commitments to how the transport strategy will be implemented and monitored. Parking at the WNDA will be prioritised for those that car share to the highest ratios, disabled workers, and those that cannot us any alternative mode other than car to access the site. It is not expected that workers who live in north Anglesey would travel to Dalar Hir, they will be encouraged to car share or use a bus service. The time saved by using such options would sufficiently disincentivise travel to Dalar Hir.</p> <p>The principles in the DAS that includes the Site Campus [REP2-029-030] also states that we will provide appropriate levels of disabled and light goods vehicle parking spaces on site.</p> <p>Notwithstanding the above, the following statement will be included in the next version of the CoCP (for submission at deadline 5):</p> <p>Horizon is confident that its DCO application contains all of the necessary parking (onsite and at Dalar Hir) to meet the requirements of the Wylfa Newydd Project and minimise the traffic and transport impacts. However, Horizon will consider the use of the proposed Park and Share facilities (including as stops on the shuttle bus network, where demand exists) at Four Crosses, Gaerwen, Bangor and Caernarfon, on the basis that these Park and Share facilities are delivered by others, as a complementary component of the transport strategy for the Wylfa Newydd Project.</p>		



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			IACC 0124	Appendix F of the Transport Assessment (provided at Appendix C2.04 of the Environmental Statement) (APP-107)  Overarching Code of Construction Practice (CoCP) (Deadline 5 version)	<p>To-date, Horizon have relied on the assumption that workers will be willing to walk or drive to another workers place of residence to car share, based on living close to each other or directly en-route. The IACC disagrees with this assumption due to it being unrealistic and overambitious; whereas the Authority believes the combination of the estimated geographic distribution of the workforce, the churn of workers over the construction period and the emphasis on car sharing imposed by Horizon will inevitably lead to workers making informal arrangements (or formally via the proposed database) to meet each other near the strategic road network. It is currently envisaged workers will meet near such locations as junctions 6, 7 and 8 of the A55, including other areas on the mainland, to car share the onward journey either to Dalar Hir Park &amp; Ride or directly to the Wylfa Newydd Development Area (WNTA). This reflects current practice by workers car sharing on the island.</p> <p>Within the DCO documentation, Horizon have stated that any worker failing to adhere to their agreed and chosen route to work (e.g. car share arrangement or bus route) will be refused entry through appropriate enforcement measures and potentially be given a formal warning. The IACC is particularly concerned with the lack of detail provided in relation to the proposed monitoring and enforcement for indiscriminate parking, which will result in local communities suffering undue inconvenience resulting from un-social and inconsiderate fly-parking by construction workers. This sensitive issue has been highlighted in previous press releases in relation to the HPC project.</p> <p>Further to this, the IACC are concerned with the lack of contingency planning should the incentives prove insufficient to encourage car sharing, with the proposed disciplinary action for breach of car sharing being unrealistic as the construction programme will inevitably be argued by HNP to take priority over the car-sharing strategy. This is particularly the case with workers who may indiscriminately park within walking distance of the site (i.e. Tregele), or in the vicinity of the nearest shuttle bus stop to the site.</p> <p>The IACC believe that the provision of additional Park &amp; Share (P&amp;S) facilities (on a smaller scale to Dalar Hir) at strategic locations would mitigate this impact and enable more sustainable travel patterns to the Wylfa Newydd site and Park &amp; Ride facility, as well as provide resilience, flexibility and a contingency provision to Horizon's Strategy.</p> <p>Recognising the risk to local communities and the highway network, the IACC are currently working in collaboration with the Welsh Government and Gwynedd Council in developing suitable P&amp;S sites to provide this resilience and contingency to the Wylfa Newydd workers during the construction phase. The IACC would welcome further discussion with Horizon on the implementation and delivery of these sites.</p>	<p>Horizon has committed through the Workforce Management Strategy (WMS) [APP-413] to discipline any worker caught fly-parking. Paragraph 2.2.1 of the WMS states that <i>"Any personnel found to be parking outside designated areas (or 'fly parking') will be disciplined"</i>.</p> <p>Issues of fly parking could be reported by local residents or stakeholders via the enquiries and complaints procedures (as secured in the WN CoCP, Deadline 5 version to the Transport Engagement Group which is proposed to manage and monitor traffic and transport issues for the Wylfa Newydd Project. IACC will be a member of this Transport Engagement Group which will have access to funds to undertake surveys and potentially implement management measures. The remit of this Transport Engagement Group is currently being negotiated with IACC.</p> <p>Regarding HPC - The Local Authorities in Somerset have publicly praised EDF in recent Transport Forum meetings on their swift and effective action in resolving fly-parking issues successfully in the local community. It is clear that so far EDF are successfully managing fly parking and Horizon plans to do the same for Wylfa Newydd to minimise any inconvenience to the local community.</p> <p>Notwithstanding the above, the following statement will be included in the next version of the CoCP (submitted at deadline 5):</p> <p>Horizon is confident that its DCO application contains all of the necessary parking (onsite and at Dalar Hir) to meet the requirements of the Wylfa Newydd Project and minimise the traffic and transport impacts. However, Horizon will consider the use of the proposed Park and Share facilities (including as stops on the shuttle bus network, where demand exists) at Four Crosses, Gaerwen, Bangor and Caernarfon, on the basis that these Park and Share facilities are delivered by others, as a complementary component of the transport strategy for the Wylfa Newydd Project.</p> <p>The CoCP contains measures to manage traffic impacts during construction, including how car sharing will work, with a target of 2.0 construction workers per vehicle in the peak year of construction,</p> <p>The next version of the CoCP is also to be updated with mode share targets and early years bus strategy as set out in the 'Proposed Travel Strategy Monitoring' note published and sent to IACC on the 25th January 2019.</p>	Ongoing	Horizon's view is that IACC's outstanding concerns are addressed by the CoCP, but this has not been confirmed by IACC.

Topic	Sub topic	Issue	SoCG ID	Document Reference/ Signpost/ Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
					IACC to review revised CoCP before assessing whether the item is agreed or not.			
		Bus Operations	IACC 0125	<p>Appendix F of the Transport Assessment (provided at Appendix C2.04 of the Environmental Statement) (APP-107)</p> <p>Overarching Code of Construction Practice (CoCP) (Deadline 5 submission version)</p>	<p>Some of Horizon’s shuttle bus services may be express routes, such as the Holyhead, Caernarfon and Bangor services, while services around the north and east of Anglesey, such as Cemaes, Amlwch and Benllech, are likely to be ‘multi-stop’ services. The IACC opposes to a ‘hail and ride’ service on any Class I and II road on the basis of road safety and the potential for fly-parking.</p> <p>Horizon have failed to adequately consider and address the difficulty in procurement and day to day operation of the number of buses and drivers needed to operate the shuttle buses, whilst also take into consideration the varying demand; and a lack of detail of appropriate and safe bus stops to serve the shuttle services. Additionally, Horizon’s assumption that routeing will be determined by the operator to maximise the service to workers compounds the issue as there is no indication as to how this will be agreed with and monitored by IACC.</p> <p>Evidence from the HPC project highlights that there is an issue with pre/post weekend fly parking near to bus stops. Travel-mode statistics indicate 90% of non-home based travel is by shuttle bus, which is considerably higher than what was anticipated in the EDF Transport Assessment. This is due to a higher proportion than estimated of workers locating in Bridgewater, nearer to the site, and a lower proportion living further afield. This corroborates the IACC’s view that North Anglesey will be impacted the greatest.</p> <p>IACC to review revised CoCP before assessing whether the item is agreed or not.</p> <p>The IACC would also note this issue is dependent on sufficient funding being secured in the Transport schedule of the S.106.</p>	<p>Noted. A ‘hail and ride’ service is not proposed. Only workers living within 600m of a bus stop would be able to access bus services, thus they will be instructed to walk to the bus stop and fly-parking is not envisaged as an issue for workers travelling by bus. Only those workers living within 600m will be allocated bus as form of transport. It is deemed likely and appropriate that construction workers can walk 600 metres to a bus stop. It should be noted that IACC’s recent Planning Application for a Park and Ride Site at Four Crosses assumed that workers would walk up to one mile (1,600m) to reach the proposed Park and Ride facility (see paragraph 4.3 of “Traffic Impact Assessment, Proposed Park and Share, Four Crosses, Anglesey). IACC approved this analysis and has provided planning consent for the scheme.</p> <p>Horizon is confident in sourcing adequate suppliers to implement the bus strategy as this will be a large, long-term contract. To our knowledge, the HPC Project has not encountered issues in bus procurement to service their bus strategy. The routing of bus services will be flexible to respond to demand, i.e. worker accommodation locations. Routes are not to be determined by the bus operator, rather they will be defined by Horizon Issues associated with the delivery of the shuttle bus service can be considered by the Transport Engagement Group of which IACC is a member. This group has access to monitoring funds to undertake surveys and / or deliver mitigation measures if considered appropriate.</p> <p>In terms of worker accommodation locations, the Gravity Model in the DCO application was used to determine a best estimate of worker home locations. It is acknowledged that worker locations may change as the Project develops and other external factors will affect where originate and where they are likely to live during their tenure on the Project. It is for this reason that the bus strategy is flexible in order to respond to changing worker locations and ensure the strategy is successful. This is described in paragraphs 5.1.15 to 5.1.19 of the Transport Assessment.</p> <p>Notwithstanding the above, the next version of the CoCP submitted at Deadline 5 is also to be updated with mode share targets and early years bus strategy as set out in the ‘Proposed Travel Strategy Monitoring’ note published and sent to IACC on the 25th January 2019.</p>	Ongoing	Horizon’s view is that IACC’s outstanding concerns are addressed by the CoCP and draft S.106 agreement , but this has not been confirmed by IACC.

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						<p>Note that the likely reason for more HPC construction workers living in Bridgwater than expected is that it is a major town with plenty of local services and entertainment options. This is why it is expected that most Wylfa Newydd construction workers will live in towns such as Holyhead and Bangor. The number of workers living in north Anglesey and their associated traffic impact has been assessed by the Transport Assessment and no operational impacts are expected.</p> <p>Bus stop locations are to be agreed in advance with IACC.</p>		
	Method	VISSIM Model Scope	IACC 0126	Transport Assessment (contained at Appendix C2.04 of the Environmental Statement) (APP-101)	It is agreed between both parties that the scope of the VISSIM model is appropriate in its scale, study area, parameters and flexibility to assess the traffic effects of the Wylfa Newydd project, and provided by Welsh Government on behalf of all stakeholders.		Agreed	No further action
		Transport Assessment Scope	IACC 0127	Appendix B of the Transport Assessment (provided at Appendix C2.04 of the Environmental Statement) (APP-103)	The TA scope has been updated to incorporate comments from the IACC. This is agreed.		Agreed	No further action
		WeITAG	IACC 0128	The Transport Assessment (contained at Appendix C2.04 of the Environmental Statement) (APP-101)	It is agreed that the transport assessment has been carried out using industry-standard tools, techniques and software in accordance with DfT standards and the principles of WeITAG		Agreed	No further action
		A-road Assessment	IACC 0129	Not included in a DCO document, side study for the benefit of IACC.	The scope/ methodology for the A-Road assessments in its scale, study area, parameters and flexibility to assess the traffic effects are agreed.		Agreed	No further action
	Baseline and Data Collection	Traffic Data Report	IACC 0130	Appendix D of the Transport Assessment (contained at Appendix C2.04 of the Environmental Statement) (APP-105)	IACC confirmed in meeting of December 2017 that baselines information was acceptable and agreed.		Agreed	No further action

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		Traffic Surveys	IACC 0131	Appendix D of the Transport Assessment (contained at Appendix C2.04 of the Environmental Statement) (APP-105)	IACC confirmed in meeting of December 2017 that baselines information was acceptable and agreed.			Agreed	No further action
		Accident data	IACC 0132	Appendix E of the Transport Assessment (contained at Appendix C2.04 of the Environmental Statement) (APP-106)	IACC confirmed in meeting in December 2017 that the principle of using Personal Injury Accident (PIA) data was acceptable for use as part of the Accident Analysis			Agreed	No further action
		Junctions Assessment(s)	IACC 0133	Appendix H of the Transport Assessment (contained at Appendix C2.04 of the Environmental Statement) (APP-109)	IACC have concerns regarding the capacities of Junction 2 of the A55 (for the Logistic Centre) and Junction 4 and the associated roundabout (for Dalar Hir). The IACC to review additional information submitted by HNP on 18 <sup>th</sup> January 2019 relating to the Junction 4 interchange junction before assessing whether the item is agreed or not.	Horizon's position is that traffic related to the Wylfa Newydd Project does not cause J2 of the A55 to have any capacity issues. The only issue occurs in 2033 which is caused by background traffic only given the Logistics Centre will be closed and would have ceased operations several years earlier.		Ongoing	Horizon's view is that IACC's outstanding concerns are addressed, but this has not been confirmed by IACC
		Strategic Traffic Model	IACC 0134	Appendix G of the Transport Assessment (contained at Appendix C2.04 of the Environmental Statement) (APP-108)	It is agreed between both parties that the strategic traffic model is appropriate in its scale, study area, parameters and flexibility to assess the traffic effects of the Wylfa Newydd project.			Agreed	No further action
		Ports Requirements and Considerations	IACC 0135	Transport Assessment (contained at Appendix C2.04 of the Environmental Statement) (APP-101)	It is agreed that the number of construction vehicles required to access the Wylfa Newydd Development each day has been calculated assuming that the MOLF receives at least 60% of construction materials, once its operational, although Horizon would seek to increase this amount to 80% where possible.			Agreed	No further action
	Modelling and Assumptions	Reasonably Foreseeable Future Projects	IACC 0136	Transport Assessment (contained at Appendix C2.04 of the Environmental Statement) (APP-101)	It is agreed that the list of Reasonable Foreseeable Future Projects for the purposes of the Transport Assessment is appropriate			Agreed	No further action



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		Impact of the Logistics Centre on Junction 2 of the A55	IACC 0137	Appendix H of the Transport Assessment (contained at Appendix C2.04 of the Environmental Statement) (APP-109)	It is agreed that the Transport Assessment demonstrates that the implementation of Parc Cybi distribution centre increases traffic flows above capacity of the junction, but this change is not related to the Wylfa Newydd Project, on the basis that there is already consent for substantial development at Parc Cybi, including on the Associated Development site.		Agreed	No further action
	Mitigation	Britannia Bridge	IACC 0138	Code of Construction Practice [Deadline 5 version] and Code of Operational Practice [REP2-037]	<p>The IACC expressed concern with regards to the resilience of Britannia Bridge. Local experience and traffic data already suggests that the Bridge is a pinch point on the A55 and at peak periods (eastbound AM and westbound PM), during summer months, or when the ferry has disembarked at Holyhead; this has considerable traffic implications on the Britannia Bridge. This may be further compounded with the larger ferries due to be commissioned by Irish Ferries in early mid 2020's. This is the only section of the E22 Euro Route that is single carriage so there is already concern that this will be further compounded by traffic generated by Wylfa Newydd. Additionally, adverse weather conditions have a significant impact on both the Britannia Bridge and Menai Bridge (diversion route) where the bridge may be closed to high-sided vehicles, as well as closure during an incident i.e. road traffic collision. This was recently exemplified, whereby North Wales Police prohibited vehicular traffic on Britannia Bridge for over eight hours due to a road traffic collision. Disruption to the road network was still evident many hours after re-opening of the bridge.</p> <p>IACC notes Horizon's proposals but does not agree that they will be effective. This raises significant concerns with regards to resilience which Horizon has failed to adequately consider for both the movement of goods and workers. The IACC seeks further discussion with Horizon, along with other stakeholders i.e. Welsh Government and Gwynedd Council, to discuss and agree the management of Wylfa Newydd construction traffic during the closure of Britannia Bridge, and any other incident on the road network via a Traffic Incident Management Plan (TIMP).</p> <p>A robust assessment of the impacts of Wylfa Newydd traffic on Britannia Bridge has been undertaken for the peak hour of the peak construction year, including conservative factors applied to background traffic growth and the assumption that at least 60% of freight is delivered via the MOLF vs the aspiration to deliver up to 80% where possible. Therefore a robust assessment has already been included in the DCO Transport Assessment regarding the impacts of Wylfa Newydd Project traffic on Britannia Bridge.</p> <p>The DCO application includes provision for stockpiling of materials on-site for 2-3 weeks ensuring construction activity is not affected by temporary closures of roads or weather events (see paragraph 5.4.29 of the Integrated Traffic and Transport Strategy, Appendix F of the Transport Assessment).</p> <p>In the event of an incident or closure, Horizon has been requested by North Wales police to simply adhere to diversion routes. Horizon will assist with incident management of Wylfa Newydd Project construction traffic including providing key points of contact in the instance of an incident, relaying incident-related information to construction traffic operators. This is described in the WN CoCP (Deadline 5 version) at Section 5 which was updated at Deadline 2. It has however come to light via the January Issue Specific Hearings that the North Wales Police do now want Horizon to prepare a TIMP. Horizon is therefore offering a commitment to produce a Traffic Incident Management Scheme to be agreed by the Isle of Anglesey County Council in consultation with Gwynedd Council Welsh Government and North Wales Police.</p>		Agreed	No further action



Topic	Sub topic	Issue	SoCG ID	Document Reference/ Signpost/ Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
		Traffic Incidents	IACC 0139	<p>Code of Construction Practice [Deadline 5 version]</p> <p>Main Power Station Site sub-CoCP [REP2-032]</p> <p>Marine Works sub-CoCP [REP2-033]</p> <p>Off-Site Power Station Facilities sub-CoCP [REP2-034]</p> <p>Park and Ride sub-CoCP [REP2-035]</p> <p>Logistics Centre sub-CoCP [REP2-373]</p> <p>A5025 Off-line Highway Improvements sub-CoCP [REP2-036]</p> <p>Code of Operational Practice [REP2-037]</p> <p>Mitigation Route Map [REP2-038]</p> <p>Phasing Strategy REP4-014</p>	<p>The following is agreed:</p> <p>The scope/methodologies for the Traffic Incident Management Strategy (TIMS); Construction Traffic Management Strategy (CTMS); Operational Travel Strategy (OTP) and Operational Delivery Servicing Strategy (ODSS) have been tabled and presented to IACC at Level 4 meetings where comments were provided verbally. The proposed, agreed approach to these issues is captured in the CoCP and CoOP which form part of the DCO application.</p> <p>Horizon's submitted position in relation Transport mitigation is presented in the MRM, which directs readers to the key pieces of mitigation. Key documents include the CoCP, sub-CoCP and the key mitigation included A5025 improvements, that is sequenced through the Phasing Strategy.</p> <p>Note that the following additional text will be provided in the CoCP:</p> <p><i>“Horizon and its supply chain have no statutory authority in the event of a traffic incident on the road network. However, Horizon and its supply chain will assist with incident management planning through the following measures.</i></p> <ul style="list-style-type: none"><li><i>• Maintaining a site-based delivery management team as a contact point for contractors, emergency services and the highway authorities. This team will help manage and coordinate Horizon and its supply chain’s response to an incident.</i></li><li><i>• Controlling the number and frequency of Heavy Goods Vehicles (HGVs) on the designated HGV routes.</i></li><li><i>• Establishing an appropriate communications protocol for workers bus drivers transporting construction workers and HGV drivers.</i></li><li><i>• Communicating incident management information to all workers, contractors making a delivery, and bus operators transporting workers.</i></li><li><i>• Holding HGVs and buses at appropriate locations, including the Logistics Centre, during an incident.”</i></li></ul> <p>IACC notes Horizon's proposals but does not agree that they will be effective.</p> <p>It has however come to light via the January Issue Specific Hearings that the North Wales Police do now want Horizon to prepare a TIMP. Horizon is therefore offering a commitment to produce a Traffic Incident Management Scheme to be agreed by the Isle of Anglesey County Council in consultation with Gwynedd Council Welsh Government and North Wales Police.</p> <p>The next revision of the CoCP will contain more detail on construction traffic management, worker travel management, monitoring and enforcement in line with the CTMP and Proposed Travel Strategy Monitoring notes shared with IACC previously.</p> <p>The next revision of the CoOP submitted at Deadline 5, will include a commitment to target 1.5 permanent operational workers per vehicle as a car share ratio.</p>		Agreed	No further action
			IACC 0140	<p>Code of Construction Practice – highway condition</p>	<p>The existing condition of the A55 J2, 3 and 4 roundabouts are in a deteriorating condition, however they do not currently present a hazard to road users. However, with the expected increase in HGV traffic as a result of the project, this may have a detrimental impact on the condition of the highway network. Evidence from the HPC project confirms that:</p> <p>i. roads were improved in advance of construction;</p> <p>ii. road condition and deflectograph surveys were undertaken prior to commencement and undertaken on a regular basis</p>	<p>The A5025 On-Line Highway Improvements have been approved under separate consent and within this application Horizon is committed to resurface Sections 1,3,5, and 7, and provide completely new highway for sections 2,4,6 and 8 of the A5025. There are no proposals to improve the surface of the A5025 between the proposed Power Station Access Road Junction and the existing Power Station entrance. It is Horizon's intention to conduct road surface surveys of this section</p>	Ongoing	The final extents of the conditions surveys will be agreed between IACC Highways and Horizon.

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					<p>during the construction programme with maintenance carried out where required; and</p> <p>iii. a final deflectograph survey will be undertaken at the end of the construction roads.</p> <p>The IACC will seek a DCO requirement to undertake surveys of the existing road condition on the following sections of road at agreed intervals of the construction phase:-</p> <p>Such surveys will assist in the identification of:-</p> <p>a) Improvements to be undertaken by Horizon prior to the commencement of construction in order to ensure resilience and minimise maintenance requirements during the course of construction;</p> <p>b) Remedial works to be undertaken by Horizon prior during the power station construction phase; and/or</p> <p>c) Remedial works to be undertaken by Horizon prior following the power station construction phase.</p>	<p>of the A5025, in liaison with IACC, in order to evaluate the condition of the road surface and potential risks of failure during the early construction stages of the Wylfa Newydd project. This will determine whether improvements are necessary, including appropriate timing of the works. This is secured in the s.106 agreement.</p> <p>Discussions are ongoing with IACC highways to finalise the extents of the surveys and the frequency. However, the survey will incorporate the following areas</p> <ol style="list-style-type: none"><li>1. Dalar Hir Junction 4 - Survey of the dumbbell roundabouts interchange, to include the circulatory routes to the interchange and the on/off slip roads from the A55.</li><li>2. Valley Junction 3 – survey of dumbbell roundabout interchange, to include circulatory routes and on/off slip roads from A55 and the A5 west to the entrance to the Freight Yard</li><li>3. Parc Cybi Junction 2 – Survey of the Tymawr dumbbell Interchange, to include circulatory routes and on/off slip roads to A55, the A5153 south from Tymawr roundabout to Parc Cybi roundabout and Parc Cybi road to entrance of the Logistics site at parc Cybi</li><li>4. Llanfachreath – survey of 1.5km through the Village</li><li>5. Magnox junction to Power station access – 1km of highway</li></ol>		
		Discharging of vehicles from WNDA	IACC 0141	Main Power Station Site sub-CoCP (APP-415)	<p>IACC seeks further information on how Horizon will control the discharge of vehicles from the WNDA following each shift period. IACC believes a lack of discharge control may lead to workers using rat-runs, overtaking of HGVs/shuttle buses, etc.</p> <p>The IACC notes ample storage on site to hold HGVs, however seeks clarification on the technological/control system that will be implemented at the WNDA to control the discharge of HGVs. The IACC would expect a similar system to be implemented at the WNDA to what is currently proposed at the Logistics Centre. HNP to confirm.</p>	<p>The release of HGVs from the WNDA will be managed and controlled. This is described in the submitted Transport Assessment (APP-101) and committed to in the Main Power Station Site sub-CoCP [REP2-032].</p> <p>here is ample storage on site for holding HGVs. For example, All of the laydown areas can be available as temporary parking for HGV's in the event of an incident on the A5025 which requires Horizon to stack HGV on site until the incident is declared over.</p>	Not Agreed	Horizon's view is that IACC's outstanding concerns are addressed by the CoCP.
		Monitoring and reviewing vehicle speeds on the A5025 following the opening of the highway improvements	IACC 0142	Wylfa Newydd CoCP (Deadline 5 submission version)	<p>The following is agreed:</p> <p>The draft s.106 provides for transport monitoring from implementation for the duration of the Construction Period.</p> <p>The results of transport monitoring undertaken pursuant to Section 5 of the Wylfa Newydd CoCP (Deadline 5 version), to be further updated and enhanced At Deadline 5 will be provided to the Transport Engagement Group on a quarterly basis (or other such period as agreed with the Transport Engagement Group).</p> <p>Speed surveys are to be funded by Horizon following completion of the A5025 Offline Highway Improvements. Results to be discussed with IACC and new speed orders implemented if required. See S.106 agreement.</p>		Agreed	No further action

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		Section 38 agreement (A5025 Offline improvements )	IACC 0143	N/A	<p>IACC as Highway Authority are willing and able to enter into agreements to facilitate the necessary works to the public highway in a manner which respects the Highway Authority's need to maintain control of the public highway network and to manage occupation of the carriageway it in the interests of public safety and effective traffic management. A S278 agreement has been successfully concluded between Horizon and IACC for the A5025 online works and IACC would be willing to progress such agreements (i.e. S278 and/or S38) to facilitate these works.</p> <p>Such an agreement should also allow the IACC and Horizon to agree upon a Commuted Sum for the future maintenance of the new public highway.</p> <p>The IACC to review the draft Protective Provisions submitted by HNP before assessing whether the item is agreed or not.</p>	These agreements will be included as part of the Protective Provisions for the protection of highways and traffic within the DCO.	Ongoing	Horizon's view is that IACC's outstanding concerns are addressed by the draft Protected Provisions, but this has not been confirmed by IACC.
		A5025 Offline improvements Detailed Design	IACC 0144	<p>Draft DCO (REP2-020)</p> <p>Design and Access Statement volume 3 (REP4-018)</p>	<p>IACC seeks a requirement to ensure the detailed design of the road improvements are fully agreed with the Highways Authority prior to commencement of road construction.</p> <p>Such requirements are proposed to be included within the Protective Provisions. The IACC to review the draft Protective Provisions submitted by HNP before assessing whether the item is agreed or not.</p>	<p>Horizon has submitted detailed designs for the offline highway works for approval as part of the DCO. It is agreed that the following requirements deal with this matter:</p> <p>Draft requirement OH3 states that in the event that the undertaker elects not to construct Work No.s 8, 9, 10 and 11 (excluding any viaduct, overbridge or underpass comprised in those Works) in accordance with the Detailed Design Drawings, construction of that work may not commence until plans and written details of the design (including size, external appearance, and siting) have been submitted to and approved by IACC.</p> <p>Draft requirement OH5 requires IACC approval for the detailed designs for viaducts, overbridges and underpasses, subject to the design principles (in volume 3 of the Design and Access Statement) and limits of deviation specified in the draft DCO.</p>	Ongoing	Horizon's view is that IACC's outstanding concerns are addressed by the draft DCO, but this has not been confirmed by IACC.
		A5025 Offline Boundary requirements	IACC 0145	Draft DCO (REP2-020)	It is agreed that boundary features will be maintained by the land owner. If it arises that there are any boundaries to land owned by IACC then Horizon will work with IACC to agree the details and develop a schedule of the boundary treatments.		Ongoing	Horizon will work with IACC to agree the details and develop a schedule of the boundary treatments where applicable.
		A5025 Offline Access rights	IACC 0146	Draft DCO (REP2-020)	<p>The IACC seeks to agree upon the access rights that will be granted to the Highway Authority to enable full access to all highway structures from all directions (including overbridges, underpasses and culverts) and surface water attenuation ponds and ancillary assets for maintenance purposes.</p> <p>The following is agreed:</p> <p>Article 19(3) of the draft DCO provides that any land which was not previously part of the public highway but becomes public highway by virtue of construction under this Order will be deemed to have been dedicated as public highway immediately upon completion, unless otherwise agreed with the local highway authority. This would include any associated highway works or structures (such as surface water attenuation ponds or culvert). Therefore, under the draft DCO, as the highway authority, IACC would have full access following completion of the Off-Line Highway Improvements.</p>		Agreed	No further action

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		Valley crossroads	IACC 0147	Draft DCO (REP2-020)	<p>IACC seeks to agree on the level and detail of amendments required to the Valley crossroads following the opening of the Valley Off-line bypass. This includes amendments/reconfiguration of the junction, pedestrian and cycle crossing point, fly-parking prevention measures, etc.</p> <p>The following is agreed:</p> <p>The Valley cross-roads are not within the Order Limits and are therefore works in respect of this junction is not included within the DCO application. As the highways authority, IACC is responsible for any works relating to this crossroads junction following the opening of the A5025 Off-Line Highways Improvements (in particular, Section 1 - Valley). Horizon would support IACC in their proposals during any public consultation. HNP offer is for a financial cap for the movement of the bus shelter and alternations to kerbs at crossing points. See S.106 agreement (Valley upgrade works contribution)</p>		Agreed	No further action
		Construction Traffic Management Plan	IACC 0148	Wylfa Newydd CoCP (Deadline 5 version) Logistics Centre Sub-CoCP (REP2-373)	The IACC seeks to agree upon a Construction Traffic Management Plan for every A5025 Offline bypass.	Horizon's proposals for management of construction traffic associated with the Offline Highway Improvements is contained in the off-Line Highway Improvements CoCP[REP2-036]. However Horizon are willing to discuss further changes with IACC on this matter.	Ongoing	Horizon's view is that IACC's outstanding concerns are addressed by the CoCP, however Horizon are willing to discuss further changes with IACC.
		Dalar Hir Proposed Roundabout	IACC 0149	Draft DCO (REP2-020)	The Highway Authority seeks to agree on the proposed roundabout/road layout at the proposed Dalar Hir Park and Ride entrance.	Horizon has submitted detailed designs for the Dalar Hir roundabout for approval as part of the DCO process. However, Horizon has agreed to develop the proposed layout to minimise the impact on the existing highway network and accommodate the concerns raised by IACC Highways and the design is to be agreed with IACC.	Ongoing	The design is to be agreed with IACC.



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HEALTH AND WELLBEING								
Health and Well Being	Method	Health Impact Assessment Scope	IACC0150	Health Impact Assessment Report (APP-429)	It is agreed between both parties that the HIA contains all the required elements of a comprehensive HIA. The IACC notes that it clearly identifies the various policy frameworks, the Wylfa Newydd DCO Project itself and specific vulnerable groups.		Agreed	No further action
		Assessment of Electro Magnetic Field (EMF)	IACC0151	Health Impact Assessment Report, Section A.5 (HIA Scoping) (Examination Reference Number APP-429)	IACC to update.	<p>Electromagnetic field (EMF) is not within the scope of the HIA Report as the HIA looks at effects on communities outside the perimeter fence.</p> <p>Section A.5 of the HIA Report sets out the scope of the HIA including an explanation, as requested by Public Health England, for scoping out the potential issue of electromagnetic field effects.</p> <p>Proximity is a key factor in EMF exposure and so the electrical infrastructure on the Wylfa Newydd Development Area (e.g. an electrical substation at the Site Campus) is not expected to adversely affect local communities.</p> <p>The HIA Report identifies one substation that is in a community context - this is the substation at the north-west of the Off-Site Power Station Facilities site.</p> <p>This is considered in volume O of the HIA Report. The desk-based qualitative assessment concludes that there an appropriate separation between the substation and the closest dwelling (approximately 10m), so changes in health outcomes are not likely. This is based on the precautionary findings of the UK Stakeholder Advisory Group on Extremely Low Frequency Electric and Magnetic Fields (SAGE). SAGE notes that for ground-mounted final distribution substations, background electromagnetic field levels are achieved within two to five meters.</p> <p>The power line connection of the Power Station as part of the North Wales Connection Project is a matter for National Grid (which includes a National Grid rapid HIA).</p> <p>Occupational exposure by the Wylfa Newydd DCO Project construction and operational workforces to electromagnetic fields is a matter for the Occupational Health and Hygiene services.</p>	Ongoing	IACC to confirm current position
		Air Quality (including dust emissions and noise)	IACC0152	Health Impact Assessment Report, Sections C.2 and D.2 (Air Quality) (APP-429)	IACC's position is that it would be appropriate to adopt World Health Organisation (WHO) limits for PM2.5	Horizon cannot commit to the non-statutory WHO guidelines. The air quality standards for the protection of human health were based on the UK air quality objectives and environmental assessment levels. These set ambient air quality standards to provide protection to human health from high air pollution concentrations. The Directives are based around a consensus amongst the	Ongoing	Further discussions required



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						<p>Member States based on scientific opinion as to the effectiveness of the limit values to protect human health.</p> <p>For the air quality assessment, the quantitative modelling assessment of PM2.5 from construction plant exhaust emissions, road traffic emissions and operational combustion plant was undertaken using the UK air quality objective of 25ug/m3 to determine the significance of effect. The construction dust assessment does not rely on assessment criteria relevant to PM2.5 so is not affected by this recommendation - the method was agreed with the IACC (see above).</p> <p>The use of the WHO guidelines for the quantitative modelling assessments would not have affected the outcome or determination of significance of air quality effects in relation to PM2.5.The HIA notes the WHO guidelines, but where there is a difference between WHO and UK values, the assessment uses the UK limit values.</p> <p>The determination of significance for air quality effects in the HIA Report is informed by (but not based on) UK statutory standards. The methods also consider other equally relevant evidence sources on ‘importance’ and ‘acceptability’, including:</p> <ul style="list-style-type: none"><li>the scientific literature on non-threshold health effects,</li><li>baseline conditions,</li><li>local policy and consultation responses (including those of the IACC on this matter).</li></ul> <p>As neither UK statutory standards nor WHO guidelines represent complete protection from health effects, meeting either threshold would not automatically rule out finding a significant effect, all sources of evidence on ‘importance’ and ‘acceptability’ are taken into account by the HIA. The new Welsh Guidance does not suggest the use of WHO thresholds so adopting those that currently apply (UK statutory standards) is therefore considered the most appropriate and objective basis for that one criteria on acceptability in the HIA.</p> <p>Even if WHO guidelines were considered the relevant regulatory benchmark (which is not considered proportionate nor is it supported by the policy context), the HIA findings would not be changed due to the consideration of the other evidence sources outlined above that focus the HIA conclusions on non-threshold</p>		

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						air pollutants beyond the consideration of particular thresholds.  The standards used in the assessment of air quality, and the fact that some pollutants have non-threshold effects, have been discussed in face-to-face meetings and teleconferences with the HIA Steering Group (HIA SG Meeting Minutes 03.03.17) and with the IACC; Natural Resources Wales and Public Health Wales (HIA SG Sub-Group Meeting Minutes 16.06.17).		
		Well-Being of Future Generations Act (Wales) 2015	IACC0153	Environmental Statement, chapter C1 (APP-088)  Welsh Language Impact Assessment (APP-432)  Equality Impact Assessment (APP-434)  Health Impact Assessment Report (APP-429).	IACC's position is that all public sector bodies will be considering their responses in the context of the WBGF Act and have requested a statement from Horizon who is not subject to the WBFG Act. IACC considers that the requirements of the WBFG Act applies to the whole application and will continue to strongly advise that the development is considered through the lens of the wellbeing legislative framework.	Horizon's position is that the Well-being of Future Generations (Wales) Act 2015 places duties on public bodies and these duties do not automatically extend to developers such as Horizon. Horizon maintains that the approach taken across the Wylfa Newydd DCO Project is in accordance with the Act. Horizon wishes to support public bodies in discharging their duties in respect to the Act. To this end, the links to the Well-being Goals are identified in the Chapter C1 of the Environmental Statement Volume C Project wide effects (APP-088), Welsh Language Impact Assessment (WLIA) (APP-432), Equality Impact Assessment (EqIA) (APP-434) and the). HIA Report (APP-429).  HIA Report table A-6 sets out links in the HIA to the Well-being Goals of the Well-being of Future Generations (Wales) Act 2015 to support public bodies in discharging their duties in accordance with the Act when considering the HIA.	Ongoing	Further discussions required
		Definition of Sustainable Development	IACC0154	Health Impact Assessment Report section L.2 and Table A-5 (APP-429)	IACC position is that the HIA should adopt the definition of Sustainable Development contained in the Wellbeing of Future Generations (Wales) Act 2015 and adopted in Planning Policy Wales.	HIA Report section L.2 notes that core values of an HIA include sustainable development. Table A-5 of the HIA Report notes that the Well-being of Future Generations (Wales) Act 2015 defines 'Sustainable development' as the process of improving the economic, social, environmental and cultural well-being of Wales by taking action aimed at achieving the 'Well-being Goals' in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.	Ongoing	Further discussions required
	Baseline and Data Collection	Baseline	IACC0155	Health Impact Assessment Report, Volume M (HIA appendix - baseline) (APP-429)	IACC's position is that the Public Services Board Wellbeing Assessment (WBFG Act) and the Population Needs Assessment (SS & WB legislation) should be adopted as the foundation of the wellbeing baseline.	Horizon's position is that whilst it is acknowledged that there are other baseline datasets for Anglesey, ether available, or under development, it is not proposed that all those baselines are incorporated into the Health Impact Assessment (HIA) for assessment purposes.  Relevant data from the Anglesey Well-being Assessment baseline prepared by the Gwynedd and Môn Public Services Board (2017) has been included	Ongoing	Further discussions required

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						<p>in the HIA Report volume M (appendix - baseline) (APP-429) where appropriate as a common baseline.</p> <p>Table M-6 of the HIA Report provides site-specific data from representative Anglesey Well-being Assessment Areas.</p> <p>However, as the geographical extent of the Well-being Assessment Areas differ from the areas of potential effect considered by the HIA, in many cases other baseline data sources (e.g. for Lower Layer Super Output Areas) are more appropriate..</p>		
		Baseline data	IACC0156	Health Impact Assessment Report, Volume M (HIA appendix - baseline) (APP-429)	IACC’s position is that the baseline data that is proposed to be used for the HIA appears in parts to be out-dated	<p>The HIA baseline focuses on national census statistics that are gathered every ten years (the last in 2011). Whist some more recent statistics may be available on more regularly updated metrics, there are methodological benefits in using statistics from the same population at the same point in time. It would not be considered proportionate to update the HIA report with every new statistical release (e.g. those reported quarterly). A baseline is a position against which to measure change. The HIA baseline was up-to-date at the time of writing and it is clear on the date of the statistics used. Further updating the HIA baseline is considered to be neither proportionate nor likely to affect the assessment.</p> <p>The selection of the most appropriate baseline for monitoring purposes would be a matter for discussion by the Health and Well-being Engagement Sub-Group (item 0097 Mitigation Route Map (REP2-038) secured through the Draft s.106 agreement.</p>	Ongoing	Further discussions required
	Assessment	Safeguarding	IACC0157	<p>Health Impact Assessment Report, Section C.7 (lifestyle and behaviour) (APP-429)</p> <p>Workforce Management Strategy (Examination Document Reference: APP-413) (note WMS was updated for Deadline 5</p>	IACC considers that a more detailed assessment is required on the impact on safeguarding and health protection particularly in relation to vulnerable groups. The IACC position is clearly articulated in LIR Chapter 6. Further discussions required between IACC and HNP to assess where common ground can be achieved.	<p>In its response to the IACC LIR Horizon (at REP3-004, ch 6) set out how this has been assessed in the Health Impact Assessment (APP-429).</p> <p>During the issue specific hearing on 7<sup>th</sup> January 2019 (REP4-002) and in its Post Hearing Note (REP4-007) Horizon confirmed that appropriate measures will be in place. These are set out below.</p> <p>It is agreed that safeguarding is a key issue relating to the development and the construction workforce.</p> <p>The revised Draft s106 agreement (23.01.19) sets out provisions for safeguarding in schedules 5, 6, 8 and 14.</p> <p>Section 3.4 of the Code of Construction Practice (submitted at Deadline 5 (12 February 2019)) states</p>	Not Agreed	No further action

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				(12 February 2019)  Code of Construction Practice (Deadline 5 submission version) (note CoCP was updated at Deadline 5 (12 February 2019))  Draft DCO s.106 agreement		<p>that prior to the commencement of the authorised development, Horizon will prepare and submit for approval a Community Safety Management Scheme (CSMS) in accordance with the Requirements in Schedule 3 and Schedule [21]<sup>3</sup> of the Draft DCO. The approved CSMS (or any approved variations) will be implemented for the duration of the construction of the Wylfa Newydd DCO Project and Horizon, as set out in the Draft DCO s.106 agreement, will continue to collaborate with emergency services for the duration of the construction period. Horizon will establish a joint working group to work collaboratively on development of the CSMS.</p> <p>Horizon will take such actions as it can to guide the behaviour of its construction workforce, both on-site and off-site, through the implementation of the Workforce Management Strategy (WMS) (APP-413) and the principles which it outlines in respect to the development of a Code of Conduct. The principles relate to compliance with a Code of Conduct, compliance with relevant behavioural standards, procedures and legislation, training provision and completion, as well as enforcing the use of certain Project facilities and services.”</p> <p>All personnel working with, or for, Horizon at site and who will access offices where Sensitive Nuclear Material (SNI) is held, or who require access to SNI, Nuclear Material, Other Radioactive Material or access the Site Licence Site will require a minimum of Baseline Personnel Security Standard (BPSS) pre-employment check. This is in accordance with regulations under ONR and as written in the Management requirements for the contractor.</p> <p>Separate to BPSS checks, Horizon staff who will work with children, such as STEM ambassadors, or with vulnerable adults will receive an enhanced DBS check. This will be co-ordinated through Human Resources.</p> <p><b>Horizon policies:</b> Horizon’s Modern Slavery Act Statement (2018) (available at <a href="https://www.horizonnuclearpower.com/files/downloads/our-policies/Modern-Slavery-Act-Transparency-Statement%20(2018).pdf">https://www.horizonnuclearpower.com/files/downloads/our-policies/Modern-Slavery-Act-Transparency-Statement%20(2018).pdf</a>). This sets out a robust response to the risk of modern slavery and maintains a clear focus on developing policies, process and internal capability to understand and manage future risks. This includes existing policies, principles and</p>		

<sup>3</sup> Please note that Schedule 21 is intended to be renumbered as Schedule 24 in the final DCO.

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						<p>standards including whistleblowing procedure and a supply chain charter; proactive approach to risk; a robust due diligence approach and training and awareness raising.</p> <p><b>Liaison with external stakeholders</b> is of great importance. Prior to, and throughout, the construction appropriate dialogue will be maintained between Horizon, the contractor and local safeguarding agencies, including North Wales Police. Discussions will include any individual or coordinated measures appropriate to avoiding risks to vulnerable groups, for example in relation to human trafficking and direct or indirect sex work. Security protocols will be prepared by Horizon in consultation with North Wales Police, and IACC, and reviewed annually. An appropriate number of Horizon and supply chain staff will be trained in safeguarding issues so that, for example, security staff who conduct site and/or vehicle inspections will be aware of signs of illegal activity such as human trafficking.</p> <p><b>Adaptive monitoring:</b> Horizon will establish an external stakeholder group (hereafter Health and Well-being Engagement Group) (secured through the Draft DCO s.106 agreement). If appropriate the Group will discuss the need for additional mitigation or follow-up investigation. To facilitate this process, a set of key topics and indicators will be agreed. The topics will be expected to include safeguarding [with regard to vulnerable adults and children].</p> <p>Horizon will also put in place measures that indirectly contribute to safeguarding by improving relations with the local community and reducing the potential for adverse effects on community cohesion: Welsh language; access to services; employment opportunities for local residents; business opportunities for local enterprises and community issues (REP3-004). Community Involvement Officers appointed by Horizon will be a key interface between the local community, key stakeholders and Horizon management.</p>		
		Community Cohesion Report	IACC0158	Community Cohesion Report (Appendix C1.03 of Volume C of Environmental Statement) Health Impact Assessment	The IACC is concerned that if workers at the site campus have access to their vehicles, they will be mobile and more likely to interact with the local community and its residents. The IACC is therefore concerned with the associated safeguarding issues which would not necessarily be addressed by the Code of Conduct.	<p>It is agreed that safeguarding is a key issue relating to the development and the construction workforce.</p> <p>Horizon will implement measures that are of direct relevance to safeguarding.</p> <p>The s.106 agreement sets out provisions for safeguarding in schedules 5, 6, 8 and 14.</p>	Ongoing	IACC to confirm if content that this issue is covered through detail to be developed through the CSMS



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				<p>Report, Section B.5 (transport) (APP-429)</p> <p>Workforce Management Strategy (WMS) (APP-413) (note WMS was updated for Deadline 5 (12 February 2019))</p> <p>Draft DCO s.106 agreement</p>		<p>Horizon is preparing a Community Safety Management Strategy (CSMS) which would be agreed collaboratively with the Emergency Services Engagement Group.</p> <p>Horizon will take such actions as it can to guide the behaviour of its construction workforce, both on-site and off-site, through the implementation of the Workforce Management Strategy (WMS) (APP-413) and the principles which it outlines in respect to the development of a Code of Conduct. The principles relate to compliance with a Code of Conduct, compliance with relevant behavioural standards, procedures and legislation, training provision and completion, as well as enforcing the use of certain Project facilities and services.”</p> <p>All personnel working with, or for, Horizon at site and who will access offices where Sensitive Nuclear Material (SNI) is held, or who require access to SNI, Nuclear Material, Other Radioactive Material or access the Site Licence Site will require a minimum of Baseline Personnel Security Standard (BPSS) pre-employment check. This is in accordance with regulations under ONR and as written in the Management requirements for the contractor.</p> <p>Separate to BPSS checks, Horizon staff who will work with children, such as STEM ambassadors, or with vulnerable adults will receive an enhanced DBS check. This will be co-ordinated through Human Resources.</p> <p><b>Horizon policies:</b> Horizon’s Modern Slavery Act Statement (2018) (available at <a href="https://www.horizonnuclearpower.com/files/downloads/our-policies/Modern-Slavery-Act-Transparency-Statement%20(2018).pdf">https://www.horizonnuclearpower.com/files/downloads/our-policies/Modern-Slavery-Act-Transparency-Statement%20(2018).pdf</a>). This sets out a robust response to the risk of modern slavery and maintains a clear focus on developing policies, process and internal capability to understand and manage future risks. This includes existing policies, principles and standards including whistleblowing procedure and a supply chain charter; proactive approach to risk; a robust due diligence approach and training and awareness raising.</p> <p><b>Liaison with external stakeholders</b> is of great importance. Prior to, and throughout, the construction appropriate dialogue will be maintained between Horizon, the contractor and local safeguarding agencies, including North Wales Police. Discussions will include any individual or coordinated measures appropriate to avoiding risks to vulnerable groups, for example in</p>		

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						<p>relation to human trafficking and direct or indirect sex work. Security protocols will be prepared by Horizon in consultation with North Wales Police, and IACC, and reviewed annually. An appropriate number of Horizon and supply chain staff will be trained in safeguarding issues so that, for example, security staff who conduct site and/or vehicle inspections will be aware of signs of illegal activity such as human trafficking.</p> <p><b>Adaptive monitoring:</b> Horizon will establish an external stakeholder group (hereafter Health and Well-being Engagement Group) (secured through the Draft DCO s.106 agreement). If appropriate the Group will discuss the need for additional mitigation or follow-up investigation. To facilitate this process, a set of key topics and indicators will be agreed. The topics will be expected to include safeguarding [with regard to vulnerable adults and children].</p> <p>Horizon will also put in place measures that indirectly contribute to safeguarding by improving relations with the local community and reducing the potential for adverse effects on community cohesion: Welsh language; access to services; employment opportunities for local residents; business opportunities for local enterprises and community issues (REP3-004). Community Involvement Officers appointed by Horizon will be a key interface between the local community, key stakeholders and Horizon management.</p>		
		Community Impact Report	IACC0159	Community Impact Report (APP-435)	<p>The IACC welcome the Community Impact Report, but in its current form, it signposts rather than states the issues, impacts and mitigation proposals in the various thematic assessments. Adoption of baseline evidence is cited but includes no analysis of the current state of Anglesey and of individual Study Area has been carried out. IACC's position is that this is essential to understand the 'current state of play' in localities before their capacity/capability to accommodate/handle the impacts of the project and other planned projects.</p>	<p>As stated in paragraph 1.3.9 of the Community Impact report (CIR), the CIR is not itself an assessment of effects, but rather draws on the assessments undertaken in the Draft DCO application documents. From this, it aims not to be a full summary of such documents but focuses only on the significant effects related to specific local communities as well as specific issues of concern raised through the consultation process. For reasons including the avoidance of duplication, consistency in assessment approach and reported effects thereafter this approach was considered sufficient and appropriate.</p> <p>In regard to the lack of analysis of the current state of Anglesey and individual study area(s), while this has not be specially done within the CIR, such analysis has been undertaken within all socio-economic chapters of the ES, namely C1 – H3, and within other Draft DCO application documents as appropriate. Such analysis was deemed adequately sufficient in terms of making account of the existing environment in which the CIR is based.</p>	Not Agreed	No further action

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		Displacement	IACC0160	<p>Volume C Chapter C1 of the Environmental Statement (Examination Document Reference: APP-090)</p> <p>Draft DCO s.106 agreement</p> <p>Horizon’s Jobs and Skills Strategy (APP-411)</p> <p>Health Impact Assessment Report, Section C.9 (employment, income and economic development) (APP-429)</p> <p>Draft DCO s.106 agreement</p>	Refer to above issue on displacement but it is noted that there is a particular concern in relation to the displacement of jobs within the care sector.	<p>Horizon acknowledges that some people may choose to move from other sectors to work on the Wylfa Newydd DCO Project and intends to support backfilling of any vacancies through the Employment and Skills Service.</p> <p>Revised commitments to developing a final JSIP with the Council have now been set out in the revised Draft s.106 agreement issued 23.1.19. This will include identifying KPIs.</p> <p>Horizon will support IACC and BCUHB through workforce planning including assisting in the development of their own Workforce Strategies to mitigate labour churn within the health and social care sector.</p> <p>Such support would be provided via a dedicated payment from the skills contribution</p> <p>Labour churn in the health and social care sector is assessed in section C.9 of the HIA Report. This includes consideration of the displacement of jobs within the care sector.</p>	Ongoing	Horizon’s view is that IACC’s outstanding concerns are addressed by the draft S.106 agreement , but this has not been confirmed by IACC
	Mitigation	Lifestyle/Behaviour/Safeguarding	IACC0161	<p>Health Impact Assessment Report (APP-429)</p> <p>Workforce Management Strategy (APP-413) Workforce Management Strategy (WMS) (APP-413) (note WMS was updated for Deadline 5 (12 February 2019))</p>	IACC’s position is that an approach needs to be developed with reference to the predominantly male construction workforce and in relation to safeguarding issues	<p>Safeguarding is a key issue relating to the development and the construction workforce. Horizon agrees with IACC that the construction personnel will be well behaved and law-abiding (para 1.1.4, chapter 6, REP2-066).</p> <p>See the row above on <i>Community Cohesion</i>.</p>	Ongoing	Horizon’s view is that IACC’s outstanding concerns are addressed by the CoCP and draft S.106 agreement , but this has not been confirmed by IACC

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				Draft DCO s.106 agreement				
		Healthcare Provision	IACC0162	Health Impact Assessment Report, Section C.6 (demand for medical and healthcare services) (APP-429)  Draft DCO s.106 agreement	<p>Horizon has engaged with BCHUB, PHW and WAST on this topic and has entered into a Statement of Common Ground with each organisation on healthcare provision for the construction workforce. These SoCGs, and provisions in Schedule 8 of the Draft s.106 agreement, cover the healthcare needs of the workers and dependents, including referrals to secondary care, dentistry and prescriptions and referral processes.</p> <p>The Health (Monitoring) Contribution will be paid by the Developer to the Council for onwards payment to BCUHB for the purpose of monitoring the effects of the Wylfa Newydd DCO Project on Local Health Services during the Construction Period, and where monitoring returns are required to be provided quarterly by BCUHB or the end recipient of the Health (Monitoring) Contribution to the Health and Wellbeing Engagement Group.</p> <p>The Health (First NHS Workforce Use) Contribution will be paid by the Developer to the Council for onwards payment to BCUHB towards the cost of non-homebased Workforce personnel registration with or use of off-Site GP services in years 1 to 3 of the Construction Period.</p> <p>The Health (NHS Partners and Dependants Use) Contribution will be paid by the Developer to the Council for onwards payment to BCUHB for the cost of partners and children of the non-homebased Workforce personnel registering with and/or using off-Site GP services during the Construction Period.</p> <p>The Health (Second NHS Workforce Use) Contribution will be paid by the Developer to the Council for onwards payment to BCUHB upon the Site Campus medical facility becoming operational towards the cost of non-homebased Workforce personnel registration with or use of off-Site GP services for the duration of the Construction Period following delivery of the Site Campus medical facility.</p> <p>The Developer will not Implement the Wylfa Newydd DCO Project until it has paid the Council these contributions.</p> <p>IACC support the agreement that Horizon has reached with BCUHB that construction workers should register with, and, prioritise the use of the on-site medical and healthcare services rather than using the community NHS services.</p>		Agreed	No further action

Topic	Sub topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
HOUSING AND ACCOMMODATION STRATEGY								
Housing and Accommodation Strategy	Method	Baseline capacity stock	IACC 0163	Workforce Accommodation Strategy (APP-412)	<p>The IACC's position is that agreement has not been reached on the baseline and quantum of PRS capacity; non-caravan tourist capacity or the position on owner-occupied sector and caravans. The IACC has put forward alternative numbers for Horizon's consideration.</p>	<p>IACC has provided a joint statement (with Welsh Govt and Gwynedd Council) on capacity. Horizon does not agree with the position and has responded to this in its Deadline 5 (12 February 2019) submission.</p> <p>Horizon acknowledges that there is some uncertainty and that management and mitigation, which are included within the Draft DCO and Draft s.106 agreement (REP1-010), will be required to deal with the risks that arise as a result of that uncertainty.</p>	Ongoing	Horizon's view is that IACC's outstanding concerns are addressed by the draft S.106 agreement , but this has not been confirmed by IACC

Topic	Sub topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
						In acknowledgement of IACC’s concerns Horizon has increased the size of the Housing Fund and believe this is sufficient mitigation for the assessed level of capacity. IACC has indicated that the increased fund is now acceptable.		
	Modelling and Assumptions	Distribution of Workers	IACC 0164	Workforce Accommodation Strategy (APP-412)	IACC's position is that further discussion is required on the distribution of workers. This should be spatial distribution of workers & distribution within each accommodation sector/type/tenure.	<p>Horizon's position is that the Gravity Model presents a best fit approach to inform assessments of the distribution of workers. The assumptions, methodology and purpose of the Gravity Model has been discussed between both parties and there is general agreement on this approach.</p> <p>The distribution in the GM is the basis of the assessment in the ES and covers the spatial distribution of workers &amp; distribution within each accommodation sector/type/tenure.. The WAMS can be used to achieve different distributions by location and sector as agreed with IACC.</p>	Agreed	No further action
	Assessment	Assessment of PRS supply	IACC 0165	Workforce Accommodation Strategy (APP-412)	The IACC are concerned that the lack of appropriate evidence base for PRS means that there is a corresponding inaccuracy in the assessment of available capacity.	Horizon is proposing that actual take-up of PRS accommodation will be monitored and mitigated through the WAMS and Housing Fund to ensure that there is not an unacceptable impact on the PRS sector.Addressed in response to IACC0096	Ongoing	Horizon's view is that IACC's outstanding concerns are addressed by the draft S.106 agreement , but this has not been confirmed by IACC
		Accommodation Supply	IACC 0166	<p>Workforce Accommodation Strategy (APP-412)</p> <p>Draft S106 agreement</p> <p>Mitigation Route Map (REP2-038)</p>	The IACC considers that the overall approach to assessing impacts on all types of accommodation is based on the availability of bed spaces and does not take into account the way in which accommodation would be let. The use of bedspaces underestimates the demand and therefore the pinch points identified in the PRS, latent and owned accommodation may be worse than identified. The impacts on accommodation should be reassessed by considering the availability of whole properties.	<p>Some PRS will be let by room and some as whole properties, taken by individuals or by groups of workers or contractors. Most workers are unlikely to take properties with spare rooms as they will seek to keep their costs to a minimum so take-up of bedspaces will broadly match availability. Horizon has taken a conservative approach to assessing the availability of accommodation and in most cases is anticipating that its workforce will only be using a small percentage of available supply. Horizon acknowledges this need to be monitored and proposes that issues are addressed through the Housing Fund and monitoring to address actual impact of workers.</p> <p>In acknowledgement of IACC’s concerns Horizon has increased the size of the Housing Fund and believe this is sufficient mitigation for the assessed level of capacity. IACC has indicated that the increased fund is now acceptable.</p>	Ongoing	Horizon's view is that IACC's outstanding concerns are addressed by the draft S.106 agreement , but this has not been confirmed by IACC



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		Increased demand for accommodation affecting affordability of housing for local people	IACC 0167	Welsh Language Impact Assessment  Overarching Code of Construction Practice (CoCP) (Deadline 5 submission version)  Draft S106 agreement	IACC's position is that further detail on the approach to the WAMS and how it could be used to direct construction workers to areas where effects on the Welsh Language and Culture could be reduced, or benefits enhanced.	<p>The WAMS is secured through the Draft s.106 agreement, and commits Horizon to monitor a number of aspects.</p> <p>The WAMS will:</p> <ul style="list-style-type: none"><li>• Maintain a database of suitable properties offered by landlords and providers, including Horizon's own TWA.</li><li>• Provide a means for workers to search for housing that meets their needs and be put in contact with the property owners or their agents.</li><li>• Require all non-home based workers to register with the WAMS and record where they are staying, and provide reports on this data to be used for management purposes.</li></ul> <p>It will also mean collecting monitoring data and reporting on it to stakeholders and using that data to help guide workers' choices and achieve better outcomes for local communities. Monitoring will also help inform and target mitigation measures, for example those aimed at the Welsh language and culture.</p> <p>In addition to this monitoring, the Drafts.106 agreement secures a Housing Fund.</p>	Ongoing	Further discussion required with IACC and Horizon
	Mitigation	Construction Workers Accommodation Management Strategy (CWAMS)	IACC 0168	Workforce Accommodation Strategy (APP-412)  Draft S106 agreement	The IACC notes that WAS ignores the stated objective of delivering legacy accommodation and skips straight to the provision of an on-site campus to deliver temporary workers accommodation (TWA). The IACC expects the strategy to provide commitment with regards to delivering legacy in order to manage expectations and to provide an indication of the possible legacy.	Legacy will be delivered through the Housing Fund, the purpose of which is to bring forward both new supply and re-use of empty homes. In acknowledgement of IACC's concerns Horizon has increased the size of the Housing Fund.	Ongoing	Further discussion required with IACC and Horizon
		Construction Workers Accommodation Management Strategy (CWAMS)	IACC 0169	Workforce Accommodation Strategy (APP-412)  Draft S106 agreement  Workforce Management Strategy (APP-413)	The IACC has sought further clarity on the nature, extent and timing of the WAMS and how it will influence worker choices and take potential capacity thresholds into account. The success / effectiveness of the WAMS as a tool to manage worker accommodation impacts will be diluted if its use is optional. This should be mandatory. The IACC requires confirmation as to whether the Strategy is applicable to the whole workforce or only to those which Horizon will directly employ. The IACC requires the Strategy to be developed for the whole workforce.	As above	Ongoing	Further discussion required with IACC and Horizon

Topic	Sub topic	Issue	SoCG ID	Document Reference / Signpost / Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
		Worker Accommodation Management Service	IACC 0170	Workforce Accommodation Strategy (APP-412)  Draft S106 agreement	IACC welcomes the commitment to the WAMS as previously confirmed, however there is insufficient detail on how the WAMS will be managed and how the role of the Oversight Board will be effective in managing demand and mitigation measures. The IACC considers that the Board must have access to data about the whole workforce and have the necessary powers to intervene. The IACC note that this is not currently guaranteed in the strategy of the WAMS.	he Draft DCO s.106 commits Horizon to establish the WAMS Oversight Board so that it is operational for the period of operation of the WAMS. Additional detail is provided in the Draft DCO s.106 agreement. The WAMS Oversight Board will have access to data about the non home based workforce and that this will influence how the Contingency Fund will be spent.	Ongoing	Further discussion required with IACC and Horizon
		Increasing housing supply	IACC 0171	Draft S106 agreement	The IACC consider that if houses are not built in line with the Joint Local Development Plan's (JLDP) trajectory or the supply is not increased in other ways to meet the increased demand, then there will be a shortfall of available houses which will adversely impact the PRS; local people's ability to afford a house; increased risk of homelessness and displacement etc.	Horizon is proposing a Housing Fund to deliver new supply including new homes to address impacts of the workforce, particularly on the PRS sector. The payments are structured to deliver in advance of peak construction.	Ongoing	Horizon's view is that IACC's outstanding concerns are addressed by the draft S.106 agreement , but this has not been confirmed by IACC
		Commitment to bringing empty homes back into use	IACC 0172	Draft S106 agreement	Bringing empty homes back into use has always been part of Horizon's strategy for addressing the impacts of the Wylfa Newydd DCO Project. IACC and Horizon have agreed an illustrative mix of spending for the Housing Fund that would include empty homes.		Agreed	No further action
		Commitment to support Latent, maintain quality of tourism accommodation, protect the tourism market, improve the quality of private rented accommodation, including landlord accreditation	IACC 0173	Workforce Accommodation Strategy (APP-412)  Draft DCO s.106 agreement	IACC and Horizon have agreed an illustrative mix of spending for the Housing Fund that would include supporting latent accommodation and improving private rented accommodation.  Landlord accreditation is required through Rent Smart Wales and all landlords offering accommodation through the WAMS will be required to be registered with Rent Smart Wales.  Horizon considers that this can be achieved through the Housing .		Agreed	No further action
		Construction Worker Campus	IACC 0174	Workforce Accommodation Strategy (APP-412)  DCO s.106 agreement  Phasing Strategy (REP4-014)	Campus has the potential to mitigate some effects upon the local housing market provided it is of sufficient size, attractive to workers and is phased appropriately (PAC3 suggests Phase 1 2021, 12mnths after construction works commence). IACC also needs certainty that the campus will be built and that it will be built and decommissioned in a phased manner. ES needs to include information on decommissioning and restoration and of the alternatives considered, including their environmental impacts. Issue to be revisited following receipt of Draft DCO and detail of on-site Campus.	An updated Phasing Strategy has been submitted. This links delivery to the number of non-home based workers.	Ongoing	Further discussion required with IACC and Horizon

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		Housing Fund	IACC 0175	Workforce Accommodation Strategy (APP-412)  DCO s.106 agreement	The IACC welcomes the commitment to provide a Housing Fund. However, the strategy lacks detail in relation to the role, purpose and size of the Housing Fund in order to ensure the timely delivery of bed space provision (in the right locations) that the Worker Accommodation Strategy (WAS) relies upon to accommodate the workforce. There is also limited reference to funding officer time to deal with increase homelessness only. The IACC considers that the Housing Fund needs to be in place in advance of construction to support the provision of new accommodation including affordable and social homes for rent, prior to the arrival of construction workers on the Island. Timescales should be agreed with the IACC which should include a phased delivery of new accommodation ahead of and throughout the construction period.	The role, purpose and size of the Housing Fund have now been agreed.	Agreed	No further action
		Accommodation Displacement	IACC 0176	Workforce Accommodation Strategy (APP-412)  Draft S106 agreement	IACC is concerned that demand from construction workers will make it more difficult for those currently on the housing waiting list to find accommodation whilst the most vulnerable are at risk of having rental contracts terminated by landlords, or simply out-competed in the market. There is also a risk of displacement of local people being able to afford properties in their communities, displacement of tourism accommodation etc.	Horizon acknowledges these risks. It's planned monitor and manage approach is intended to avoid them, and where impacts do arise, to be able to use the Housing Fund to provide additional mitigation.  In acknowledgement of IACC's concerns Horizon has increased the size of the Housing Fund and believe this is sufficient mitigation for the assessed level of capacity. IACC has indicated that the increased fund is now acceptable.	Ongoing	Horizon's view is that IACC's outstanding concerns are addressed by the draft S.106 agreement , but this has not been confirmed by IACC

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DIGITAL INFRASTRUCTURE								
Digital Infrastructure	N/A	Mobile and broadband capacity	IACC 0177	Draft DCO submitted at Deadline 5 (12 February 2019) (draft additional requirement PW12)	<p>It is agreed between both parties that a Requirement will be included in the draft DCO to require the provision of a Digital Infrastructure Plan which outlines the measures that the undertaker will implement to ensure sufficient mobile and broadband availability and capacity across the WNDA. This study will:</p> <p>a) Be informed by a full technical assessment of availability and capacity of mobile and broadband networks across the WNDA to be carried out prior to commencement of the authorised development;</p> <p>b) Require the applicant to provide the results and conclusions of the assessment to IACC and Welsh Government; and</p> <p>c) Require the applicant to provide an implementation plan which clearly demonstrates how the Applicant is going to provide sufficient digital connectivity across the WNDA for all workers.</p> <p>However, IACC consider that the above draft Requirement should be extended so that the study also considers the impact on mobile and broadband connectivity across the wider Anglesey (and north Anglesey) area.</p>	Horizon has agreed to also provide the assessment and conclusions to IACC as well as Welsh Government and will amend draft Requirement PW12 accordingly. However, Horizon does not agree that it is appropriate that the study covers the wider Anglesey area on the basis that the 3,000 non-home-based workers will be dispersed throughout communities within existing accommodation and would therefore have no greater impact on digital connectivity than if a non-Horizon worker were staying in that property.	Not agreed	

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ENVIRONMENT							
It should be noted that comments were provided by IACC on the Environment section of the SoCG on 12 <sup>th</sup> February 2019. Horizon has carried out a review of these, but in the time available has not been able to develop the draft to the same stage as the rest of the tables within the SoCG. Nevertheless, the table below provides a work in progress position on matters as of Deadline 6.							
General							
General	EIA Approach and Method	Confirm Relevant Regulations	IACC 0178	ES Volume A Chapter A5 (APP-059)	<p>Both parties agree that the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 (as amended) are relevant to the assessment consistent with the transitional arrangements (Regulation 37) of the 2017 EIA Infrastructure Planning Regulations.</p> <p>The 2016 Scoping Report and the 2017 Scoping Addendum were both submitted prior to the 2017 EIA Regulations coming in to effect. Therefore, as confirmed in the PINS Scoping Opinion, the 2009 EIA Regulations apply to the Project.</p>		Agreed
		Proposed Development Section	IACC 0179	ES Volume A Chapter A2 (APP-056) ES Chapters, D1, E1, F1, G1, H1	<p>The development that has been assessed is presented in the ES in chapters A2, D1, E1, F1, G, H1.</p> <p>IACC is content with the description of development presented within the appropriate chapters of the ES</p>		Agreed

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		Methodology	IACC 0180	ES Volume B Chapter B1 (APP-066)  ES Volume I Chapter I3 (APP-386)	High level EIA methodology is set out in chapter B1. This methodology is consistent with industry good practice and has been discussed with a wide range of stakeholders.  Methodology used for cumulative effects assessments included in chapter I3. This has also been discussed with stakeholders.  IACC is content with the high level EIA methodology set out within the appropriate chapter.  With regard to the assessment of cumulative effects, the general approach is agreed. Further comments on Horizon's approach to cumulative assessment are provided later in this SOCG.			Agreed
Marine and coastal processes								
Marine and coastal processes	Baseline & data collection	Baseline & data collection	IACC 0181	Volume D Chapter D13 Appendices (APP-219 to APP-232)	Survey methods and baseline data collection (to include the quantity of survey work) has been discussed with the IACC (along with CCW, NRW, IACC and cefas)			Agreed
	Methodology	Hydrodynamic modelling	IACC 0182	ES Volume B Chapter B13 (APP-078)	The approach to hydrodynamic modelling has been discussed with the IACC (and other stakeholders including the Environmental Focus Group). Modelling results are provided as an appendix to chapter D13. Horizon has not received any further comments on this matter and therefore considers that this matter is now agreed.			Agreed
	Assessment	Marine receptors	IACC 0183	ES Volume D Chapter D13 (APP-132)	Full assessment of marine receptors is provided in Chapter D13 and this is robust. Horizon considers this now to be agreed.			Agreed
	Assessment	Marine mammals	IACC 0184	ES Volume D Chapter D13 (APP-132)	There has been a lot of discussion with IACC regarding the potential impacts on marine mammals, particularly seals. The assessments are detailed in the chapter D13 along with baseline information. In addition, specific seal surveys were undertaken and are reported in appendix D13-6. Horizon has not received any further comments on this matter and therefore considers that this matter is now agreed.			Agreed
		Sea birds	IACC 0185	ES Volume D Chapter D13 (APP-132)	There has been a lot of discussion with IACC regarding the potential impacts on sea birds - linked with HRA. Discussions have continued on through the HRA work stream. Additional seabird surveys were undertaken through 2017 and 2018 with NRW agreement. Horizon consider the seabird baseline dataset to be comprehensive and agreed			Agreed
	Mitigation & monitoring	Habitat loss	IACC 0186	ES Volume D Chapter D13 (APP-132)  Deadline 4 Submission - Ecological Enhancements Mitigation Report. [REP4-023]  Ecological Enhancements Mitigation  Report [REP4-023]	IACC is of the opinion that the mitigation proposed for Annex I habitat is not sufficient.	There is ongoing discussion with respect to mitigation around ecological enhancement. The direct losses of intertidal and subtidal habitats are assessed in DCO ES chapter D13 and in the WFD compliance assessment. There would be a total loss of approximately 30.5ha of marine habitat, of which, 20ha have been classified as subtidal and intertidal habitats of conservation importance. The loss of habitats results from the footprint of the permanent and temporary marine works. Additional effects are predicted from Cooling Water discharge, although any loss is expected to be within the calculations of footprint loss from outfall construction activities. This loss of habitat of conservation importance is assessed as being a moderate adverse effect within chapter D13 of the DCO ES. Additional mitigation through ecological enhancement will be provided to increase the rate of establishment, complexity and diversity of ecological communities on the new marine structures resulting in a reduction of the effect on subtidal and intertidal habitats of conservation importance to minor adverse. Further details of the proposals for marine ecological enhancement of the breakwater have been provided in the form of a memorandum submitted at Deadline 4 [REP4-023].  The memorandum provides an appraisal of the available measures and the feasibility and constraints of implementing for the Wylfa Newydd Project to satisfy the requirements of Test (a) of Article 4(7) of the WFD; to		Ongoing



Topic	Sub topic	Issue	SoCG ID	Document Reference/Signpost/ Routemap	IACC Position	Horizon Position	RAG
						ensure that all practicable mitigation measures have been included in the project.	
	Assessment	Cemaes Bathing Water	IACC 0187	ES Volume D Chapter D13 (APP-132)	<p>IACC is aware that NRW have confirmed in their relevant representation that they do not agree with the conclusion that ‘there are no effects predicted on the bathing water at Cemaes, and that the Wylfa Newydd Project is considered to be compliant with the Bathing Water Directive’.</p> <p>It understands that NRW is concerned that the discharge of elevated suspended solids and sewage discharged into the marine environment has the potential to affect Cemaes Bathing Water.</p> <p>Cemaes Bathing Water has already been classified as poor in 2016 and 2017 due to diffuse pollution from agricultural land within the catchment. Incoming tides also reduce dispersion from within the bay. The beach lies within the Anglesey Area of Outstanding Natural Beauty and part of the beach is within the North Anglesey Heritage Coast. The IACC considers the water quality at Cemaes to be ‘at risk’ due to having been classed as ‘poor’ and non-compliant in 2016 and 2017 bathing seasons. Thus, any further deterioration in microbial quality due to developments at Wylfa could be deleterious to future EU compliance and impact on the coastal community which is heavily dependent on tourism.</p> <p>A Cemaes Bathing Water Task Group has been formed, which includes representation from the IACC. IACC encourages Horizon to engage with this group. The group has developed a detailed model to predict bathing water quality and IACC requires commitment from Horizon to enable it to continue to run this model during the bathing season. This should include a commitment to install a met station at a location to be agreed with the Council.</p> <p>Horizon should fully respond to the concerns of NRW as outlined in their relevant representation and prepare the further assessment as detailed in the representation to inform and appropriate mitigation measures.</p>	<p>Horizon has considered potential impacts on bathing waters from a variety of perspectives including modelling of discharges of treated foul effluent, and modelling of sediment from construction discharges. These are described in Chapter D13 (the marine environment) [APP-132].</p> <p>As presented in summary in the Water Framework Directive Assessment [APP-444], the project will not risk further deterioration in bathing water quality. Horizon concludes that its assessment is conservative due to the assumptions incorporated into the modelling and assessment work.</p> <p>Horizon has held meetings with NRW, IACC and DCWW on these issues through the Statement of Common Ground process, and in the context of the Marine Licence Application and Environmental Permit Applications. Horizon has undertaken additional bacteriology modelling to include existing sewage discharges and alternative modelling methods against parameters which were agreed with NRW.</p> <p>The results of this modelling have been presented to NRW and will be submitted in to examination at Deadline 5 (12 February 2019). The conclusions of this additional modelling support assessments in the DCO application.</p>	Ongoing

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Noise and vibration							
Noise and vibration	Baseline & data collection	Baseline & data collection	IACC 0188	ES Volume B Chapter B6 (APP-071)	The baseline and data collection have been agreed between the parties.		Agreed
	Methodology	Noise and vibration modelling	IACC 0189	ES Volume B Chapter B6 (APP-071)	All modelling approaches have been agreed between the parties.		Agreed
		AOP methodology	IACC 0190	ES Volume B Chapter B6 (APP-071)	IACC commissioned an independent review of the AOP methodology from AmecFW (now Wood) which returned a broadly complimentary response. The Air Overpressure (AOP) predictions presented in this ES were based on this methodology and took into consideration the comments from Wood on the methodology.  The AOP methodology is agreed between the parties.		Agreed
	Baseline & data collection	s.61 applications	IACC 0191	ES Volume D Chapter D6 (APP-125) Chapters, E6, F6, G6, H6	IACC position is that Development Consent Order and Town and Country Planning Applications should include commitment to produce section 61 applications under Control of Pollution Act.  Horizon's DCO application includes the commitment with the CoCP to submit for Section 61 applications to IACC.		Agreed
	Assessment	Conclusions	IACC 0192	ES Volume D Chapter D6 (APP-125) and Chapters, E6, F6, G6, H6	The parties are in agreement that the assessments of noise and vibration during construction and operation of the Wylfa Newydd DCO Project included in the Environmental Statement are a realistic worst-case assessment of the potential effects to arise from noise and vibration of the Wylfa Newydd DCO Project.		Agreed
	Mitigation & monitoring	Community Liaison Group meetings	IACC 0193	ES Volume D Chapter D6 (APP-125) and Chapters, E6, F6, G6, H6  Mitigation Route Map (submitted at Deadline 6))  Overarching Code of Construction Practice (CoCP)	IACC welcome Horizon's commitment to increase the frequency of the Community Liaison Group during the Earthworks phase and the projected delivery date for this mitigation measure being submitted during the examination  Horizon agrees that it will allow for the provision of a monthly meeting of the Community Liaison group until First Nuclear Concrete (FNC) is poured, but notes that the frequency of the meetings will be under review every 6 months to ensure the CLG is beneficial. Upon FNC, the reduced earthworks and other activities with the potential to create noise, vibration and dust mean it is Horizon's intention for meetings to revert to quarterly from FNC until the end of construction.  Horizon will update the CoCP in relation to the increased frequency of Community Liaison Group meetings during earthworks early in the DCO examination process.		Agreed
		Details of the proposed Noise monitoring - number and broad siting of locations	IACC 0194	ES Volume D Chapter D6 (APP-125) and Chapters, E6, F6, G6, H6  Mitigation Route Map (submitted at Deadline 6))  Main Power Station Site sub-CoCP	A technical note was issued to IACC 10/10/2018 and discussed in the SOCG meeting 12/10/2018. This proposed six monitoring locations for residential receptors around the site, with three off-site (Cemaes, Tregele and Felin Gafnan) and three on-site. Subsequently, Horizon has committed to a seventh monitoring location at the Site Campus.  Horizon will submit these locations in to examination as an update to the CoCP.  IACC is in agreement of the seven monitoring locations proposed by Horizon and welcomes the proposed timing of delivery into examination.		Agreed
		Details of proposed Noise Monitoring - Equipment	IACC 0195	ES Volume D Chapter D6 (APP-125) and Chapters, E6, F6, G6, H6  Mitigation Route Map (submitted at Deadline 6))  Main Power Station Site sub-CoCP	The technical note issued to IACC 10/10/2018 and entered in to examination at Deadline 3 [REP3-048] specified the standard to which the equipment would comply and the parameters HNP planned to measure during construction. The equipment will be capable of reporting frequency spectra (either 1/1 octave or 1/3 octave), but it is not proposed to include this information in reporting due to the volume of information it generates. The data would however be recorded and available if needed when investigating an incident.  IACC is in agreement with the noise & vibration monitoring equipment and parameters as specified in the Technical Note and that this equipment is sufficient to satisfactorily monitor the effects of construction.		Agreed

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				Technical Note indicating how Horizon would meet committed noise levels [REP3-048]	IACC re-iterate however that other parameters, such as parameters to record low frequency noise form activities such as the tunnelling works, and the frequency spectra (either 1/1 octave or 1/3 octave) should be considered and that IACC may require additional parameters such as this through the S61 process.		
		Details of the proposed noise monitoring - management of/access to monitoring data	IACC 0196	ES Volume D Chapter D6 (APP-125) and Chapters, E6, F6, G6, H6 Mitigation Route Map (submitted at Deadline 6)) Main Power Station Site sub-CoCP Technical Note indicating how Horizon would meet committed noise levels [REP3-048]	The technical note issued 10/10/2018 and entered in to examination at Deadline 3 [REP3-048] sets out the suggested data management and access for IACC for Noise monitoring information during construction which will be submitted early in examination as an update to the text in the CoCP.  IACC are in agreement with the data management and access as proposed by the technical note.		Agreed
		Details of the proposed noise monitoring - Reporting	IACC 0197	ES Volume D Chapter D6 (APP-125) and Chapters, E6, F6, G6, H6 Mitigation Route Map (submitted at Deadline 6)) Main Power Station Site sub-CoCP	The technical note 'Noise and Vibration Monitoring at the Wylfa Newydd Development Area during construction – proposed updates to Code of Construction Practice' issued 04/10/2018 formulates the Horizon position and development of monitoring proposals since DCO submission. It is Horizon's intention to formalise and submit the content of this technical note into examination by updating the relevant parts of section 8 of the Main Power Station Site sub-CoCP  IACC is satisfied with the suggestion of a monthly reporting scheme for noise until FNC, with this switching to quarterly when noisy activities reduce during this period. IACC has seen an updated version of the CoCP containing this commitment and it has been entered in to examination at Deadline 5.		Agreed
		Local Noise Mitigation Strategy	IACC 0198	ES Volume D Chapter D6 (APP-125) and Chapters, E6, F6, G6, H6 Mitigation Route Map (submitted at Deadline 6)) Overarching Code of Construction Practice (CoCP)	The LNMS is included as part of the CoCP. It sets out the eligibility criteria for the noise insulation scheme which will be used to prevent noise effects at residential receptors from both traffic and construction noise.  IACC are in agreement that the thresholds used to define eligibility to the LNMS are reasonable and sufficient to mitigate noise effects from the construction phase and associated traffic from the project.		Agreed
		Local Noise Mitigation Strategy	IACC 0199	ES Volume D Chapter D6 (APP-125) and Chapters, E6, F6, G6, H6 Mitigation Route Map (submitted at Deadline 6)) Deadline 3 Submission - Local Noise Mitigation Strategy (Companion Guide) (REP3-051)	Horizon has outlined its intention to produce a companion document to the LNMS which will provide further detail about the benefits to be expected from the scheme, the differences (i.e. pros and cons) of secondary and double glazing as noise attenuation options, and an outline of the process by which the scheme will be implemented.  IACC welcomes the potential for this information submitted into the examination process to give confidence to IACC that the noise insulation can be put in place prior to noisy activities commencing on-site.  This document was entered into examination at Deadline 3: Local Noise Mitigation Strategy (Companion Guide) (REP3-051)		Agreed
		RFNMC Blasting Strategy	IACC 0200	ES Volume D Chapter D6 (APP-125) and Chapters, E6, F6 Draft S106 agreement Mitigation Route Map (submitted at Deadline 6)), G6, H6	Horizon's position is that in-line with the information provided in August 2018's consultation. This specifies that the total number of hours of blasting proposed in the change is in line with BS 6472 and the only departure from this standard being to shift the start one hour later and finish of blasting one hour later. Horizon believes this is a non-material change providing increased flexibility to the contractor without increasing the amount of significant noise effects.  Whilst IACC is in agreement of the relevance of BS6472-2:2008 and that significant effects are unlikely to occur if blasting is conducted between 08.00 and 18.00 on weekdays, IACC considers that the times should align with that described in the British		Agreed

Topic	Sub topic	Issue	SoCG ID	Document Reference/Signpost/ Routemap	IACC Position		Horizon Position	RAG
				Main Power Station Site Sub-CoCP	Standard and should not extend to 19.00 hours on a regular basis. It is IACC's position that if infrequent blasting is required between 18.00 and 19.00 on weekdays then the lower vibration threshold of 4.5mm/s PPV set out in BS6472-2:2008 should apply.  In response to IACC feedback on the consultation, Horizon has agreed that the lower vibration threshold of 4.5mm/s PPV shall be applied to any blasts conducted between 18.00 to 19.00 on weekdays. This limit will be achieved by 95% of blasts as determined over a six-month period. This new restriction is included in the Deadline 5 submission of the Main Power Station Site sub-CoCP.			
		RFNMC Blasting Strategy	IACC 0201	AS-020 Change request 1 – Blasting Strategy, REP2-215	The IACC requires the Wylfa Newydd CoCP and relevant sub CoCPs to confirm that the project will implement and adhere to the good practice advice contained in BS5228 so far as it is relevant to the project. IACC maintains its position as set out within REP2-215 that fixed and regular blasting times are committed to within the revised CoCP and any relevant sub-CoCP such as a 5-10 minute slot either side of the hour.	Where practicable, Horizon will implement the Project in accordance with BS5228, so far as it is relevant to the Project. Horizon will agree blast periods in advance with IACC and monitor and update these as the works progress. In addition, Horizon has committed to inform residents of blasting activities in advance through social media and community communications.  Further restrictions on timing of blasts are therefore not considered practicable at this time.	Ongoing	
Soils and Geology								
Soils and Geology	Baseline & data collection	Mineral safeguarding	IACC 0202	ES Volume D Chapter D7 (APP-126)  ES Volume B Chapter B7 (APP-072).	Written correspondence from the North Wales Minerals Team confirm that while there are Category 2 Aggregate Safeguarding Areas on site there are no commercially viable mineral resources (Minerals Safeguarding Areas), but acknowledgement of the pre-extraction and utilisation of mineral resources should be included within the ES.  Information on aggregates in the WNDA is included in chapter D7 (APP-126). Correspondence with the Minerals Planning Team is discussed in chapter B7 (APP-072).			Agreed
	Assessment	Reinstatement of the Park and Ride	IACC 0203	ES Volume D Chapter F7 (APP-272)	The IACC thematic letter noted the following points:  “The feasibility of landscape/screening bunds to accommodate all site-derived soils not required during the operational phase which should be retained on-site for re-use during decommissioning and reinstatement of the site should also be considered.”  “Further information should be provided on the likely quantity and quality of fill required to raise the levels (as shown in the cross sections in DAS Volume 3, Appendix 1-3) and the quantity and quality of topsoil and subsoil required for reinstatement of ground levels...”	The following responses were provided:  The quality of soil to be stored and the length of the operational phase mean that it is not considered feasible to store soils in bunds on site as it will degrade and may potentially be unsuitable for use in reinstatement. Stripped soil will therefore be removed from site and reused within the Wylfa Newydd Project or at a suitable third-party receptor site. Topsoil (and subsoil as required) would be imported to site during decommissioning to restore the site to its former agricultural condition.	Ongoing	
	Mitigation	Mitigation of effects on RIGS	IACC 0204	ES Volume D Chapter D7 (APP-126)  Overarching Code of Construction Practice (CoCP)  Main Power Station Site Sub-CoCP	Mitigation measures have been discussed with Geomon, Natural Resource Wales and the IACC for the potential effects on the Porth Wnal Regionally Important Geological Site (RIGS) from the construction and operation of the Cooling Water outfall, as set out in Table B7-10 in Chapter B7..  IACCs thematic letter stated that “It is recognised that mitigation is proposed in the form of access for students/geologists ‘as operation allows’ and installation board to be erected. The full detail of this mitigation and compensation scheme needs to be discussed further.”  Mitigation measures associated with the RIGS are identified in chapter D7 (APP-126) and the Main Power Station Site sub-CoCP.		Agreed	



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		Mitigation of effects on soil	IACC 0205	ES Volume D Chapter D7 (APP-126)  Overarching Code of Construction Practice (CoCP)  Main Power Station Site Sub-CoCP  ES Volume G Chapter G7 (APP-322)	The IACC raised queries regarding the ‘enforceability and precision’ of soil management measures in the CoCPs, including IACC review and approval of soil resource survey and soil resource plan. IACC is not prepared to rely upon the unenforceable commitment by Horizon to the employment of suitably qualified personnel. IACC requires amended CoCPs or a DCO requirement to ensure adequate and enforceable control over the development.	The overarching CoCP commits Horizon to the employment of suitably qualified and experienced personnel.  Horizon and its suitably qualified and experienced personnel will ensure that the soil resource survey and the soil handling procedures to be implemented by the appointed contractor(s) are adequate and fit for purpose. As a result, it is not considered that any further detail is required within the CoCP.	Ongoing
		Remediation Strategy	IACC 0206	ES Volume D Chapter D7 (APP-126) and ES Volume D Appendix D7-02 (APP-144)  Overarching Code of Construction Practice (CoCP)  Main Power Station Site Sub-CoCP	The remediation strategy identifies that there are further measures and plans that are required for its delivery, in particular those to address unexpected contamination, implementation of the remediation and verification. Suggested wording for inclusion in the CoCPs has been provided within the LIR.  IACC proposes that should this information not be available by the end of the examination that a new suitably worded requirement is introduced to allow for the approval of the information detailed in the IACC LIR, and re-confirmed in IACCs response to Q2.4.16 (PINS second round of written questions).	Summary of LIR response:  The Main Power Station Site Sub-CoCP was updated at Deadline 2 (4 December 2018) to include further details on the proposed remediation activities.  Section 9.4 of the Overarching CoCP (APP414) includes management strategies for dealing with unexpected contamination which Horizon consider appropriate to mitigate risks.  Section 9.4 of the Wylfa Newydd CoCP also requires that a remediation verification plan be prepared prior to remediation works commencing and a remediation verification report, which confirms remediation has been successfully completed, be prepared once remediation works have been undertaken.  Horizon consider that the wording provided by the IACC in the LIR is already adequately covered by Section 9.4 of the Wylfa Newydd CoCP and the updated Main Power Station Site Sub-CoCP.	Ongoing
Waste and Materials							
Waste and Materials	Methodology	Legislation, Policy and Guidance	IACC 0207	ES Volume B Chapter B16 (APP-081)  Overarching Code of Construction Practice (CoCP)  Main Power Station Site Sub-CoCP	IACC raised that national and local planning policy and other plans and programmes at a European, national, regional and local level focus on the need to ensure that waste is managed in accordance with the waste hierarchy and proximity principle. The SPG (4.8.1) confirms that the Wylfa Newydd project should support the delivery, aims and targets of Towards Zero Waste, the overarching waste strategy in Wales and the suite of supporting sector plans which aim to reduce the impact of waste in Wales to within environmental limits. Policy GP17 of the Wylfa Newydd SPG confirms that a Site Waste Management Plan must be provided for all sites to promote the sustainable management of waste in accordance with the waste hierarchy and reduce the transportation of waste during construction and operation.	Waste would be managed in accordance with TAN 21 and the nearest appropriate installation principle which requires waste to be disposed of or recovered (within TAN 21 recovery also includes recycling) using the most appropriate methods and technologies, in order to ensure a high level of protection for the environment and public health. TAN21 reflects the waste management drivers at a European Union and Wales level and encourages regional collaboration. TAN21 envisages a ‘network’ of infrastructure spread over a wider area than a single administrative boundary. Due to the nature and scale of waste management facilities on the Isle of Anglesey, within Gwynedd and in north Wales, facilities in the northwest of England are also considered.  Horizon has prepared waste management practices for determining how construction and operational waste will be managed, informed by the waste and materials management assessment set out in the Environmental Statement. These waste management practices are set out in the waste and material management strategy in section 9.3 of the Wylfa	Ongoing



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						<p>Newydd Code of Construction Practice (CoCP) the various site-specific sub-CoCPs and the Wylfa Newydd Code of Operational Code (CoOP).</p> <p>Horizon is confident that sufficient controls regarding the management of waste and materials relating to the Wylfa Newydd DCO Project are provided for in the Wylfa Newydd CoCP(CoCP), site-specific sub-CoCPs and the Wylfa Newydd CoOP given the information that is reasonably available at this stage of the Wylfa Newydd DCO Project. Horizon amended the Wylfa Newydd CoCP at Deadline 4 (17 January 2019) to include an updated Waste and Materials Management Strategy (WMMS) and a commitment to produce a Site Waste Management Plan (SWMP). The SWMP will be supported throughout construction with reports for each construction site detailing the waste management processes for the site, waste types produced, and waste management facilities used (section 9.3 of the Wylfa Newydd CoCP).</p>	
	Assessment	Decommissionin g stage	IACC 0208	ES Volume C Chapter C6 (APP-093)	<p>With regards to the decommissioning stage of the Main Power Station site, IACC consider that no supporting assessment has been submitted as to the composition and volumes of wastes generated and its effects on the region’s waste management infrastructure. IACC are unclear why this assessment has not been carried out. Paragraph 16.1.5 of document B169 [Examination Library reference APP-081] states that ‘<i>An assessment on the capacities of the receiving waste management facilities to receive waste materials during decommissioning have not been included in the assessment presented in Chapter C6 and would be made at the appropriate time</i>’. This is echoed in paragraph 6.4.27 of chapter C6 - Waste and materials management of the Environmental Statement [APP- 093]</p>	<p>Waste and material types and quantities for the decommissioning of the Site Campus, Logistic Centre and Park and Ride have been detailed in chapter C6 (APP-093). An assessment of the capacities of the receiving waste management facilities to receive waste generated during the decommissioning of the Site Campus, Logistic Centre and Park and Ride has been undertaken and is detailed in chapter C6 (APP-093).</p> <p>Conventional waste at the decommissioning stage is addressed in Chapter C6 - Waste and materials management of the Environmental Statement [APP- 093] (section 6.4.27). Before decommissioning starts, Horizon will need to obtain consent from the Office for Nuclear Regulation (ONR) under the Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations 1999. This would require a period of consultation relating to the submission of a decommissioning proposal and supporting Environmental Statement, which would involve an assessment relating to conventional waste arisings and management generated during decommissioning.</p>	Ongoing
		Impact on waste management infrastructure	IACC 0209	ES Volume C Chapter C6 (APP-093)	<p>IACC requires a more robust and complete assessment in respect of forecasting future waste arisings and the available capacity within the region to deal with it.</p> <p>As set out in details in the Local Impact Report-Chapter 11: Waste [Examination Library reference REP2-071] it is considered that the applicant’s waste impact assessment contains several information gaps – most notably:</p> <ol style="list-style-type: none"><li>1. Lack of knowledge around the volume of silt to be generated during the construction phases of the development; and</li><li>2. Inaccuracies in reporting baseline capacity data.</li></ol>	<p>The assessment in Chapter C6 - Waste and materials management of the Environmental Statement [APP-093] has considered the availability of waste management infrastructure capacity at a regional level, because local facilities would rarely be able to service a major infrastructure project of this scale. However, local availability is also a consideration, for instance, where there are no operational hazardous waste landfills in Wales. Further explanation relating to scope of the assessment of waste management capacity and the potential impact on waste management capacity is set out in the <i>Impact of waste management infrastructure</i> section of Horizon’s response to IACC Local Impact Report.</p> <p>In addition to following established assessment methodologies, Horizon sought advice from Natural Resources Wales (NRW) and other stakeholders of the Waste and Materials Oversight Group (WaMOG) on 18 November 2016 regarding data sources to inform the assessment. Subsequently, Horizon used the data provided by NRW in 2017 and other published data by NRW and the Environment Agency for the assessment (see Appendix C6-1 [APP-117]). Waste capacity and throughput</p>	Ongoing

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					<p>As a consequence of these gaps, it is considered that a full and robust assessment of the waste impacts of the project has not been carried out.</p> <p>In addition to this, and as reflected in paragraph 1.6.4 and 1.6.5 of IACC’s Local Impact Report-Chapter 11: Waste [Examination Library reference REP2-071], IACC believes that the assessment is fundamentally flawed in respect of the off-site disposal of hazardous and non-hazardous waste – resulting in potentially negative effects possibly being under reported. This is because all other parts of the assessment i.e. that relating to on-site use of waste and materials; off-site composting of waste; off-site anaerobic digestion and in-vessel composting of waste; and off-site reuse and recycling of waste, are all carried out in the context of the capacity within North Wales to accommodate any waste arisings. However, the assessments which relate to the off-site disposal of hazardous and non-hazardous waste have been carried out in the context of North-west England’s ability to absorb waste arisings. This approach is contrary to established Welsh planning policy (and the proximity principle, which requires waste to be managed as close as possible to its source of generation); and results in an inconsistent overall waste and materials management assessment, which evaluates one part of the waste stream against local / regional waste management infrastructure and other parts, against a much larger waste infrastructure catchment area (which given its size and inevitable large permitted capacities, will always result in ‘not significant’ effects being reported).</p>	<p>information on waste management facilities will continue to change over time in response to operational and/or regulatory activities. This is acknowledged in Section 6.3.15 of Chapter C6 - Waste and materials management of the Environmental Statement [APP-093]. NRW also recognises that the available waste management capacity will need to be updated prior to and throughout the construction phase (Draft SoCG between NRW and Horizon, submitted at Deadline 5).</p> <p>While a needs-based assessment is not directly included, the assessment included in chapter C6 (APP-093) does consider the likely adverse effect of the waste quantities generated by the Wylfa Newydd Project on the capacity of waste management infrastructure. Details on the permitted facilities located in north Wales are provided in appendix C6-1 (6.3.30). This includes each facility’s capacity (tonnes per annum), location and distance from the proposed development. The capacity information is summarised in appendix C6-1 (6.3.30) and used to assess any adverse effect of the waste generated by the Wylfa Newydd Project on the capacity of these waste management facilities.</p> <p>Horizon will also support local waste management facilities, carriers and suppliers where there is a known supply and demand need and where those facilities and/or services can meet Horizon’s quality, compliance and auditing expectations. By supporting the local supply chain to understand the opportunity, there is potential for Horizon to adopt a more sustainable approach to managing select waste types and volumes that is pragmatic, scalable and achievable with proximity and suitability in mind. In turn this holds potential for significant opportunities to reduce the number and distance of waste movements.</p> <p>Horizon will continue to work with IACC, NRW and other stakeholders to develop and implement the approach to conventional waste management. Horizon will update IACC via the WaMOG in relation to the evolving WMMS. This will ensure that the forecast of waste in the SWMP can be compared with locally available capacity, including potential capacity from unimplemented permissions.</p>	
	Mitigation	Waste management	IACC 0210	<p>ES Volume C Chapter C6 (APP-093)</p> <p>Overarching Code of Construction Practice (CoCP)</p> <p>Mitigation Route Map (submitted at Deadline 6))</p>	<p>Waste and Materials Oversight Group (WaMOG) convened by Horizon with the IACC, NRW, North Wales Minerals Planning Team and CL:AIRE were held to discuss the implementation of the waste management strategies.</p> <p>Information on the management of wastes and materials is included in chapter C6 (APP-093) along with the CoCP and sub-CoCPs. Implementation of the WMMS would need to consider local waste management opportunities where these are suitably prepared, compliant and auditable. The WMMS would also identify sufficient provision of essential waste infrastructure that is available on-site or to service the site.</p> <p>The Wylfa Newydd SWMP would involve a review of the waste management facilities available to the Wylfa Newydd DCO Project and a request will be made to IACC and NRW at that time for the most up to date information and data available. Horizon will throughout construction prepare reports for each construction site detailing the waste management processes for the site.</p>		Agreed
		Materials management	IACC 0211	<p>ES Volume C Chapter C6 (APP-093)</p>	<p>Waste and Materials Oversight Group (WaMOG) convened by Horizon with the IACC, NRW, North Wales Minerals Planning Team and CL:AIRE were held to discuss adoption of the CL:AIRE Materials Management Code of Practice and the implementation of the materials management strategies.</p>		Agreed

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				Overarching Code of Construction Practice (CoCP)  Mitigation Route Map (submitted at Deadline 6))	Information on the management of wastes and materials is included in chapter C6 (APP-093) along with the CoCP and sub-CoCPs. It is agreed that this deals with the matter sufficiently.		
Air Quality							
Air Quality	Baseline & data collection	Baseline monitoring and specification of background concentrations or dust deposition rates for use in the assessment	IACC 0212	ES Volume B Chapter B5 (APP-070), ES Volume B Appendix B5-1 (APP-083)	Horizon set out proposals to use existing IACC monitoring data to provide background concentrations of NO2, PM10 and PM2.5 and dust deposition rates and verify modelled road traffic emissions, supplemented with other background air quality data, including the Defra/Welsh Government background maps.  A 12-month supplementary NO2 diffusion tube survey was initiated with the IACC in Feb 2016 which included measurements at 12 locations on Anglesey. The NO2 survey was discussed and agreed with the IACC prior to commencement and measured concentrations were bias adjusted using the same method the IACC uses for Local Air Quality Management.  The approach to determining the background concentrations and use of baseline air quality data was set out in a baseline air quality report which was submitted as an appendix to the EIA Progress Report in Feb 2016 and also submitted directly to the IACC for comment in May 2017. The IACC had no further comments on the May 2017 report.  Baseline and data collection is agreed.		Agreed
	Method of Assessment	Air quality assessment methodology	IACC 0213	ES Volume B Chapter B5 (APP-070), ES Volume C chapter C4 (APP-091), ES Volume D chapter D5 (APP-124), ES Volume E chapter E5 (APP-243), ES Volume F chapter F5 (APP-270), ES Volume G chapter G5 (APP-308) and ES Volume H chapter H5 (APP-359)	The modelling and assessment methodology report was issued to the IACC in November 2014. This set out the proposed modelling and assessment methodologies for the key elements of the air quality assessment for the Wylfa Newydd Project (i.e. study areas and receptor identification, assessment criteria, determination of significance, model scenarios, assessment of construction dust, modelling and assessment of road traffic emissions, modelling of combustion emissions from construction plant, machinery and marine vessels and modelling of combustion emissions from standby generators and steam-raising boiler plant). This was discussed and updated during ongoing pre-application consultation to take into account comments from stakeholders including the IACC. The latest version was issued to the IACC in May 2017 for comment. The IACC accepted the methodologies except for two separate issues relating to assessment criteria (discussed separately below) and these were used in the ES.		Agreed
		Study areas and receptor identification	IACC 0214	ES Volume B Chapter B5 (APP-070), ES Volume C chapter C4 (APP-091), ES Volume D chapter D5 (APP-124), ES Volume E chapter E5 (APP-243), ES Volume F chapter F5 (APP-270), ES Volume G chapter G5 (APP-308) and ES Volume H chapter H5 (APP-359)	A separate report on the methodology for receptor selection and the proposed study areas for the air quality assessment was issued to the IACC in January 2017 and updated version issued in July 2017. This incorporated comments from the IACC made during consultation and no further comments were received. This was used as the basis of the assessment in the ES and is agreed.		Agreed
		Schedule of ecological receptors and assessment criteria for deposition	IACC 0215	ES Volume B Chapter B5 (APP-070), ES Volume B Appendix B5-2 (APP-084)	A report which provided a schedule of the ecological receptors to be considered within the air quality assessment was issued to the IACC. This also set out the critical loads for the assessment of nitrogen and acid deposition. This was used as the basis of the assessment in the ES. No further comment was received from the IACC and this matter is agreed.		Agreed
		Assessment criteria for human receptors,	IACC 0216	ES Volume B Chapter B5 (APP-070)	The IACC recommended that Horizon should adopt the World Health Organisation air quality guideline value of 10µg/m3 for PM2.5 as a trigger to initiate a joint investigation and, where Horizon’s activities are considered to have contributed to the exceedance, Horizon shall then prepare an action plan setting out all reasonable actions which could be taken to reduce PM2.5 emissions and		Agreed



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		details of the proposed air quality monitoring - trigger levels			implement those. Horizon confirms that it will adopt the suggested trigger value and this will be included in an update to the Main Power Station Site sub-CoCP and Marine Works sub-CoCP submitted at Deadline 5 (12 February 2019).		
	Mitigation + monitoring	Community Liaison Group meetings	IACC 0217	Overarching Code of Construction Practice (CoCP)	IACC welcome Horizon's commitment to increase the frequency of the Community Liaison Group during the Earthworks phase to monthly meetings until at least First Nuclear Concrete is achieved in the construction programme. The IACC notes that after the first six months, and every six months thereafter, the CLG meeting frequency will be reviewed as required.  Horizon updated the Wylfa Newydd CoCP in relation to the increased frequency of Community Liaison Group meetings during earthworks at Deadline 2 [Deadline 5 version].		Agreed
		NO2 concentrations at A55 layby location at Llanfair Pwllgwyngyll	IACC 0218	Volume C chapter C4 (APP-091)	IACC has advised that consideration be given within the assessment of road traffic emissions to relevant short-term exposure locations close to the A55. Road traffic on the A55 is expected to increase as it forms part of the project's prioritised route. IACC is requesting that Horizon commits to the installation of monitoring systems at the layby location (monitoring location A15) to allow the one hour mean AQO for NO2 be monitored in real-time for exceedances as a result of additional traffic. The IACC will use these monitoring results in considering whether measures need to be implemented in this location as part of its ongoing air quality responsibilities. The IACC proposes that this monitoring is undertaken by AQ Mesh type of monitoring device. Such monitoring data can be made available in near-real time. Diffusion tubes, providing a robust measure of monthly means, should be collocated with the AQ Meshes.This remains an area for further discussion and agreement in relation to predicted 1-hour mean NO2 concentrations at a short-term exposure location at the A55 layby location at Llanfair Pwllgwyngyll.	The assessment set out in chapter C4 concluded that exceedance of the one-hour mean AQO (a value of 200µg/m3 not to be exceeded more than 18 times per calendar year) was very unlikely. This was based on an empirically derived annual mean threshold of 60µg/m3 set out in paragraph 7.91 of the Defra and Welsh Government Local Air Quality Management technical guidance, below which the guidance states "...exceedances of the NO2 one-hour mean are unlikely to occur."  The assessment set out in chapter C4 [APP-091] predicts a maximum concentration of 40.8µg/m3 at the layby at any stage during the Wylfa Newydd DCO Project. This is a relatively small increase on the current concentrations and it is Horizon's view that this represents a very low risk of exceedance of the one-hour mean AQO. The maximum concentration is considerably lower than the peak concentration of 49.4µg/m3 recorded at the layby in 2010 for which the IACC did not investigate further and concluded that the one-hour mean AQO for NO2 is unlikely to be exceeded.  Based on the above consideration, real-time monitoring is not considered to be required.  Horizon understood that there was agreement with IACC on this issue.	Ongoing
		Additional mitigation, NOx emissions from construction plant – confirmation of effects with confirmed percentage of newer plant	IACC 0219	ES Volume D chapter D5 (APP-124), Main Power Station Site sub-CoCP, Marine Works sub-CoCP, Air Quality Mitigation Quantification Report	IACC welcome the commitment by Horizon to 90% of non-road mobile machinery (NRMM) meeting the EU Stage IV NRMM emission standards or better for plant at the Wylfa Newydd Development Area being secured within the Main Power Station Site sub-CoCP and Marine Works sub-CoCP submitted at Deadline 2 [REP2-032 and REP2-033].  IACC are in agreement having seen the results presented in the Air Quality Mitigation Quantification Report submitted by Horizon at Deadline 3 [REP3-052], that the proposed use of 90% EU Stage IV NRMM plant or better is satisfactory to ensure no significant effects from emissions to air from construction plant and equipment.		Agreed
		Details of the proposed air quality monitoring at	IACC 0220	ES Volume B Chapter B5 (APP-070), ES Volume C chapter C4 (APP-091), ES Volume D chapter D5 (APP-124), ES	The updated Main Power Station Site sub-CoCP and Marine Works sub-CoCP submitted at Deadline 2 [REP2-032 and REP2-033] contained further details on the number of monitoring stations, their approximate locations around the WNDA and the pollutants to be monitored.		Agreed

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		the Wylfa Newydd Development Area - number, locations and pollutants		Volume E chapter E5 (APP-243), ES Volume F chapter F5 (APP-270), ES Volume G chapter G5 (APP-308) and ES Volume H chapter H5 (APP-359) Wylfa Newydd CoCP (Deadline 5 version) and sub-CoCPs (: REP2-032 to REP2-036)	IACC are in agreement with the pollutants to be monitored, number of monitoring stations and their locations as provided in the updated sub-CoCPs. Following discussions with Horizon and receiving relevant technical information, IACC is in agreement that there is no need for continuous monitoring of air pollutants at an 'off-site control' location for the monitoring regime at the WNDA as the proposals include sufficient coverage of all wind directions into the site.		
		Details of the proposed air quality monitoring at the Associated Development sites - number, locations and pollutants	IACC 0221		IACC would welcome consultation with Horizon into the siting of these locations at the associated development sites.  IACC will review its comments in its thematic letters issued to Horizon late September / early October 2018 requesting continuous monitoring of PM10/PM2.5 at all Associated Development sites and advise Horizon of its position.	Horizon is proposing to undertake dust deposition monitoring at all Associated Development sites during construction as set out in the relevant CoCP and sub-CoCPs. Horizon indicates that the assessments of air quality in the Environmental Statement do not necessitate any continuous monitoring of NO2, PM10 or PM2.5 except at the WNDA (the exception is one location in the vicinity of section 5 of the A5025 Off-line Highway Improvements where continuous monitoring of PM10/PM2.5 is proposed). The need for continuous monitoring of PM10/PM2.5 is based on where the dust assessments identify high risks for any of the potentially dusty construction activities and is in accordance with the IAQM guidance on monitoring at construction sites. At all other Associated Development sites/locations, the highest risks were medium or low and dust deposition monitoring is proposed. Horizon is proposing to undertake dust deposition monitoring at those sites with low risks even though the IAQM guidance recommends that dust deposition monitoring is not required. Horizon wish to discuss the siting of the monitoring stations with the IACC in future discussions.	Ongoing
		Details of the proposed air quality monitoring - Equipment	IACC 0222		IACC is in agreement of the monitoring equipment as detailed in the technical note for PM10/2.5 and dust deposition. IACC would like to see this submitted formally in the early stages of the DCO examination for consideration.  IACC have also stated a preference for the reference method for NOx continuous monitoring at the WNDA due to its higher level of accuracy and lengthy construction timeline.	The technical note 'Air Quality Monitoring at the Wylfa Newydd Development Area during construction - proposed updates to Code of Construction Practice' issued to the IACC on 04/10/2018 to reflect the equipment that will be utilised to monitor PM10, PM2.5 and dust deposition. Horizon plan to submit this information in a revised CoCP in the early stages of examination.  Horizon has not yet confirmed its monitoring method for continuous NOx/NO2 monitoring at the WNDA, but will continue to work with IACC to ensure suitable equipment is utilised to monitor the levels of NOx during construction.	Ongoing
		Details of the proposed air quality monitoring - Response to trigger exceedances	IACC 0223		The updated Main Power Station Site sub-CoCP and Marine Works sub-CoCP submitted at Deadline 2 [REP2-032 and REP2-033] contained further details on Horizon's proposed responses to trigger exceedances which will be implemented on site during construction.  IACC agreed with the responses to triggers as detailed in the updated sub-CoCPs.		Agreed
		Details of proposed air quality monitoring - Data access	IACC 0224		The updated Main Power Station Site sub-CoCP and Marine Works sub-CoCP submitted at Deadline 2 [REP2-032 and REP2-033] contained further details on the suggested data management and access for IACC to the air quality monitoring information during construction. This will be submitted early in examination as an update to the text in the CoCP.  IACC are in agreement with the data management and access as detailed in the updated sub-CoCPs.		Agreed



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		and management						
		Details of proposed air quality monitoring - Reporting	IACC 0225		The updated Main Power Station Site sub-CoCP and Marine Works sub-CoCP submitted at Deadline 2 [REP2-032 and REP2-033] contained further details on Horizon's proposed reporting regime for the monitoring results. This includes the commitment to produce monthly air quality reports to IACC. The frequency of reporting will be considered throughout the construction period however, with reports becoming less or more frequent if necessary, in agreement with the IACC.  IACC is satisfied with the suggestion of a monthly reporting scheme for air quality emissions until FNC, with this switching to quarterly when the potential for adverse air quality effects is reduced during this period, if supported by the monitoring data.			Agreed
		Details of the proposed air quality monitoring - trigger levels	IACC 0226		The updated Main Power Station Site sub-CoCP and Marine Works sub-CoCP submitted at Deadline 2 [REP2-032 and REP2-033] contained further details on Horizon's proposed trigger levels for NO2, PM10 and dust deposition. It includes amber and red alert thresholds which will be utilised on site to prevent exceedances of the Air Quality Objectives and maintain emissions of pollutants to air as low as reasonably practicable.  IACC confirm that it is in agreement of the trigger levels proposed in the technical note for NO2, PM10 and dust as detailed in the updated sub-CoCPs.			Agreed
Landscape and Visual Amenity								
Landscape and Visual Amenity (SLVA)	Methodology	General approach - appropriate and clearly explained	IACC 0227	Volume D App D10.01 - D10.10 of the Environmental Statement (APP-192 to APP-201)	The overarching approach to the landscape and visual impact assessment agreed between IACC and Horizon.			Agreed
		Legislation, Policy and Guidance	IACC 0228	Volume D App D10.01 - D10.10 of the Environmental Statement (APP-192 to APP-201)  Volume B Chapter B10 (APP-075)	IACC maintains that the approach to the residential visual assessment is insufficiently detailed relying upon the identification of four communities as receptors. The lack of any assessment of visual effects upon residential visual receptors located outside of the four settlement is also an omission. On the matter of landscape, assessments of impacts on landscape fabric have not been undertaken (contrary to EN-1, paras 5.9.5 – 5.9.6) and assessments of landscape value do not take into account all the factors in GLVIA3 Box 5.1.	The methodology used to prepare the LVIA and supporting photomontages is set out in the ES and has been discussed with IACC, including in respect of its compliance with relevant legislation, policy and guidance.  NPS EN-1 states that assessment should include effects on “landscape components and landscape character”. However, the policy is not prescriptive on how this assessment should be undertaken, nor does it state that the effects on landscape components and landscape character should be assessed separately. GLVIA3 provides guidance and is not intended to be prescriptive. The assessment provided is in general accordance with GVVIA3	Not Agreed	
		Assessment criteria for seascape, landscape and visual amenity	IACC 0229	Volume D App D10.01 - D10.10 of the Environmental Statement (APP-192 to APP-201)	The assessment criteria (value, susceptibility and sensitivity) are very broad. As no landscape resources or visual receptors on Anglesey would have low or negligible value, susceptibility or sensitivity, only High and Medium criteria are used. This does not allow the assessments to distinguish between locally designated and undesignated landscapes.  Similarly the assessment criteria for magnitude are also very broad, which does not allow the assessments to identify the benefits of the mitigation	The methodology used to prepare the LVIA and supporting photomontages is set out in the ES and has been discussed with the relevant parties, including the assessment criteria.  Locally designated landscapes (SLAs) and non-designated landscapes are identified and assessed accordingly in chapter D10 of the ES.  In relation to the different terms used in DMRB, Horizon considers it possible and practical to combine assessments using professional judgement; This is not an uncommon situation where third party developments are typically based on a variety of different methodologies undertaken by different organisations, including highway and non-highway schemes.	Not Agreed	

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					<p>proposed (ie pre and post mitigation impacts remain the same throughout the assessments).</p> <p>The DRMB methodology uses different terms and definitions for the sensitivity and magnitude criteria which makes comparisons between the A5025 impacts and those of the WNDA and other AD sites difficult. Consequently, it is not possible to combine these assessments when considering potential cumulative impacts.</p> <p>The geographical extents are vague and not defined which does not allow the extent of the predicted significant effects on landscape character, landscape designations and linear routes to be understood.</p>	The criteria for geographical extents are defined in chapter B10 of the ES in table B10-16	
	Baseline & data collection	Limits/extents of the various study areas	IACC 0230	Volume D App D10.01 - D10.10 of the Environmental Statement (APP-192 to APP-201)	The approach to definition of study area agreed between the parties.		Agreed
		All relevant baseline data - clearly described and illustrated	IACC 0231	Volume D App D10.01 - D10.10 of the Environmental Statement (APP-192 to APP-201)  Main Power Station Site sub-CoCP	Additional surveys are required, as identified in the WNDA Landscape LIR (and AD Site LIRs)	<p>Horizon consider that the baseline data, as discussed with relevant parties, is sufficient and accurate. However, for the WNDA, the following landscape related survey requests are noted:</p> <ul style="list-style-type: none"><li>Aerial photographic survey of the WNDA and surrounding area: The DCO application already includes aerial photography of the WNDA and surrounding area.</li><li>A survey of the existing hard landscape elements on the site: the Main Power Station Site sub-CoCP states “A <i>detailed survey will be undertaken of stone wall and cloddiau construction (vernacular detailing) and hedgerow/tree species for field boundaries to be removed, to help ensure a degree of authenticity and historical continuity in the reinstatement of these features as part of the final landscape scheme.</i>”</li></ul>	Ongoing
		Seascape character units	IACC 0232	Volume D App D10.01 - D10.10 of the Environmental Statement (APP-192 to APP-201)	The information is provided in the ES and it is agreed between the parties that this matter has been dealt with.		Agreed
		Landscape fabric - all distinctive landscape features and elements identified, mapped and described	IACC 0233	Volume D App D10.01 - D10.10 of the Environmental Statement (APP-192 to APP-201)  Overarching Code of Construction Practice (CoCP)	<p>At the SoCG meeting held on 17th October 2018, IACC requested a single plan/ point of reference for comprehensive data on existing hedges, cloddiau &amp; walls etc. It was acknowledged that this could be a DCO requirement. The updated Overarching CoCP contains the following commitment:</p> <p><i>Horizon will identify other landscape features (such as stone walls, cloddiau, watercourses) to be retained during the construction phase of the Wylfa Newydd DCO Project. Appropriate protection measures (for example, erecting signage, fencing) would be put in place and maintained throughout the construction phase.</i></p>		Agreed

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		Landscape character units - based on published guidance (Policy AMG3)	IACC 0234	Volume D App D10.01 - D10.10 of the Environmental Statement (APP-192 to APP-201)	The information is provided in the ES and it is agreed between the parties that this matter has been dealt with.			Agreed
		AONB - mapped (Policy AMG1)	IACC 0235	Volume D App D10.01 - D10.10 of the Environmental Statement (APP-192 to APP-201)	The information is provided in the ES and it is agreed between the parties that this matter has been dealt with.			Agreed
		Heritage Coast (Policy AMG4)	IACC 0236	Volume D App D10.01 - D10.10 of the Environmental Statement (APP-192 to APP-201)	The information is provided in the ES and it is agreed between the parties that this matter has been dealt with.			Agreed
		SLAs - mapped and recognised character and qualities fully described and illustrated	IACC 0237	Volume D App D10.01 - D10.10 of the Environmental Statement (APP-192 to APP-201)	The information is provided in the ES and it is agreed between the parties that this matter has been dealt with.			Agreed
		Visual receptors - types and locations (onshore and offshore) fully described	IACC 0238	Volume D App D10.01 - D10.10 of the Environmental Statement (APP-192 to APP-201)	The main groups of residential receptors have been identified in the baseline with the exception of residential visual receptors in properties located outside of the identified communities.	The information is provided in the ES and it is considered to be adequate and accurate.		Ongoing
		Other developments - all relevant baseline identified and described	IACC 0239	Volume D App D10.01 - D10.10 of the Environmental Statement (APP-192 to APP-201)	The information is provided in the ES and it is agreed between the parties that this matter has been dealt with.			Agreed
	Analysis of Proposed Development	Describe how the seascape, landscape and visual baseline has influenced the design, scale, nature and site selection of the various elements of the development (Policy AMG3)	IACC 0240	Volume D App D10.01 - D10.10 of the Environmental Statement (APP-192 to APP-201)  Volumes 1 and 2 of the DAS (REP4-016/017) and LHMS (APP-424/425).  6.4.10 ES Volume D - WNDA – D10 – Landscape and Visual (APP-129)	Whilst relevant information is provided in the ES/DAS/LHMS it is not agreed between the parties that this matter has been dealt with for all the various elements of the Project.	The information is provided in the ES and it is considered that this matter has been dealt with.		Ongoing

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	Zones of theoretical visibility (ZTVs)	Theoretical, terrain based ZTVs using Ordnance Survey terrain data and a proprietary ZTV software package	IACC 0241	Volume D App D10.01 - D10.10 of the Environmental Statement (APP-192 to APP-201)	The information is provided in the ES and it is agreed between the parties with the exception that the ES ZTVs for the detailed study area need to be reproduced at A1 on a 1:25,000 OS map base.		The information is provided in the ES and it is considered that this matter has been dealt with.	Ongoing
		Limits/extents of ZTVs - sufficient to encompass all likely significant effects	IACC 0242	Volume D App D10.01 - D10.10 of the Environmental Statement (APP-192 to APP-201)	The information is provided in the ES and it is agreed between the parties that this matter has been dealt with.			Agreed
		Separate ZTVs for each element of the development	IACC 0243	Volume D App D10.01 - D10.10 of the Environmental Statement (APP-192 to APP-201)	The information is provided in the ES and it is agreed between the parties that this matter has been dealt with.			Agreed
		Cumulative ZTVs to illustrate the combined visibility of the various elements of the project	IACC 0244	Volume D App D10.01 - D10.10 of the Environmental Statement (APP-192 to APP-201) 6.4.101 ES Volume D – Figure Booklet Volume D (PART 2 of 2) (APP-238).	The parties agree that the combined ZTVs for the construction and operation periods contained in Volume 2 of the Figures booklet (APP-238) are fit for purpose.			Agreed
		Cumulative ZTVs to illustrate the combined visibility of the project with other developments	IACC 0245	Volume D App D10.01 - D10.10 of the Environmental Statement (APP-192 to APP-201)	The parties agree that no cumulative ZTVs were provided nor required for the cumulative visual assessment.			Agreed
	Viewpoint analysis	Viewpoint locations	IACC 0246	Volume D App D10.01 - D10.10 of the Environmental Statement (APP-192 to APP-201)	IACC agrees with the position set out by Horizon and as confirmed has requested four additional photomontages from viewpoints in Tregale and Cemaes.	Viewpoint locations previously agreed between IACC and Horizon. However, IACC maintained that they would reserve agreement until they saw the final scheme proposals. IACC generally in agreement but in their ‘Position Letter’ have requested assessment of four additional representative viewpoints to represent community views from Tregale and Cemaes. IACC subsequently requested further viewpoints in their LIR and responses to FWQs.  Horizon will be providing a ‘supplementary community views assessment’ for Cemaes and Tregale (planned for Deadline 6), based on the additional representative views and photomontages requested by the IACC.		Ongoing



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		Viewpoint analysis	IACC 0247	Volume D App D10.01 - D10.10 of the Environmental Statement (APP-192 to APP-201)	IACC is in agreement with the majority of the viewpoint assessments in Appendix D10-08 Visual Effects Schedule (AP-198). There are viewpoints where IACC does not agree for some assessment periods. At a limited number of viewpoints IACC also wish to review visualisations showing the implementation of an indicative colour scheme for the main power station buildings as described in the DAS (REP4-016/017).	The information is provided in the ES and it is considered that this matter has been dealt with.	Ongoing
	Assessment	Assessment of effects on seascape character	IACC 0248	Volume D App D10.01 - D10.10 of the Environmental Statement (APP-192 to APP-201)	The information is provided in the ES and it is agreed between the parties that this matter has been dealt with.		Agreed
		Assessment of effects on landscape fabric - distinctive features and elements	IACC 0249	Volume D App D10.01 - D10.10 of the Environmental Statement (APP-192 to APP-201)	IACC have stated that in their opinion, there should be a separate assessment of the effects on landscape fabric. Horizon have responded to say that the effects on landscape fabric has been considered as part of the effects on landscape character.	The effects on landscape fabric have been considered as part of the effects on landscape character.	Not Agreed
		Assessment of effects on landscape character	IACC 0250	Volume D App D10.01 - D10.10 of the Environmental Statement (APP-192 to APP-201)	The information is provided in the ES and it is agreed between the parties that this matter has been dealt with.		Agreed
		Assessment of effects on landscape designations - AONB and SLAs	IACC 0251	Volume D App D10.01 - D10.10 of the Environmental Statement (APP-192 to APP-201)	IACC agrees with the assessment of direct effects on the part of the WNDAs that is within the AONB. Horizon also draws conclusions on the AONB “overall” and states that these are not significant. Horizon has since confirmed that references to “directly affected area” should read “directly and locally affected area”, i.e. that there would also be significant effects on the AONB outside of the WNDAs. However, HNP has not explained how far into the AONB these significant effects would extend.	IACC has stated that only direct effects on the Isle of Anglesey Area of Outstanding Natural Beauty (AONB) are assessed. However, an assessment of both indirect and direct effects on the landscape character of the AONB has been undertaken, as described in appendix D10-6 (landscape effects schedule) (APP-197) and in the chapter narrative. (Refer to Local Impact Report response for further details.) This issue will be further clarified in the Errata Log appended to the ES Addendum submitted at Deadline 6.	Ongoing
		Assessment of effects on visual amenity of receptors in inshore waters and ferry routes	IACC 0252	Volume D App D10.01 - D10.10 of the Environmental Statement (APP-192 to APP-201)	The information is provided in the ES and it is agreed between the parties that this matter has been dealt with.		Agreed
		Assessment of effects on visual amenity of receptors in/on - settlements, residential properties, recreational	IACC 0253	Volume D App D10.01 - D10.10 of the Environmental Statement (APP-192 to APP-201)	IACC have concerns that the visual assessment does not provide sufficient detail about the distribution of significant and not significant effects in Tregele and Cemaes, especially for the construction period and for the PROW network. The omission of residential receptors in properties located outside the main communities does not allow a comprehensive assessment of the distribution of significant visual	IACC have requested assessment of four additional representative viewpoints to represent community views from Tregele and Cemaes.  Horizon will be providing a ‘supplementary community views assessment’ for Cemaes and Tregele (planned for Deadline 6), based on the additional representative views and photomontages requested by the IACC.	Ongoing



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		facilities, access land, Sustrans NCRs, Wales Coast Path/Isle of Anglesey Coastal Path, local public rights of way and roads			effects and therefore the development of further mitigation measures in the detailed landscape design or as part of off-site enhancement measures or s.106 measures.		
	Mitigation	General approach and specific measures	IACC 0254	Volume D App D10.01 - D10.10 of the Environmental Statement (APP-192 to APP-201)	IACC retain a number of concerns about the level of detail that has been provided to allow a comprehensive understanding of the full range of mitigation measures to be provided and their effectiveness.	Horizon consider that extensive information has already been provided in the DCO ES. It is acknowledged that not all mitigation measures have been fully developed and this is why some measures are covered by a DCO Requirement.	Ongoing
	Compensation	Compensatory measures for adverse impacts on seascape, landscape	IACC 0255	Volume D App D10.01 - D10.10 of the Environmental Statement (APP-192 to APP-201)	IACC has included in its LIR (Chapter 17) details of measures for compensation elsewhere in the AONB and Heritage Coast to protect and strengthen these designations.	No further action considered necessary in relation to compensatory measures associated with seascape	Ongoing
	Enhancement	Enhancement measures proposed	IACC 0256	Volume D App D10.01 - D10.10 of the Environmental Statement (APP-192 to APP-201)	IACC considers that there are a number of outstanding issues regarding the design and funding of on-site and off-site landscape and visual enhancement measures. Furthermore, IACC has provided Horizon with measures for enhancement and has not received a response.	No further action considered necessary in relation to enhancement measures associated with landscape effects.  For further details see the response on the justification for and potential for off-site mitigation provided in Horizon’s response to Further Written Question 2.7.4	Not Agreed
	Illustrative figures	Baseline plans and ZTVs	IACC 0257	Volume D App D10.01 - D10.10 of the Environmental Statement (APP-192 to APP-201)	The information is provided in the ES and it is agreed between the parties that this matter has been dealt with.		Agreed
		Viewpoint visualisations - photos, wireframes and photomontages	IACC 0258	Volume D App D10.01 - D10.10 of the Environmental Statement (APP-192 to APP-201)	IACC is awaiting anticipated further photomontages for the operation period and wireframes for the construction period for which no visualisation material has been provided.	The information considered necessary is provided in the ES and it is agreed between the parties that this matter has been dealt with.	Ongoing
	Appendices	All necessary supporting information	IACC 0259	Volume D App D10.01 - D10.10 of the Environmental Statement (APP-192 to APP-201)	Whilst IACC is substantially in agreement with the scope and provision of information in the appendices, given that there remain several detailed issues where agreement is Ongoing, IACC cannot agree that the appendices include all necessary supporting information,	The information is provided in the ES and it is agreed between the parties that this matter has been dealt with.	Ongoing
Environmental lighting impact assessment							
LVIA	Assessment	Night-time visual effects	IACC 0260		IACC has requested DCO requirements for detailed lighting designs submitted to and approved by IACC for the WNDA and all of the AD sites and for further	An Environmental Lighting Impact Assessment (APP-201) has been provided in the DCO application for the WNDA.	Ongoing

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				Volume D App D10.10 of the Environmental Statement (APP-192 to APP-201)  Overarching Code of Construction Practice (CoCP)  Wylfa Newydd CoOP (APP-421 )	mitigation to reduce the impacts of lighting on residential visual amenity.	A further Lighting Strategy is being produced and will be secured in the relevant sub-CoCP's and CoOP.	
Public Access and Recreation							
Public Access and Recreation	Wales Coast Path	Construction phase - route of temporary diversion around the WNDA and measures to mitigate the consequential effects on users of the route	IACC 0261	Volume C Chapter C3 of Environmental Statement (APP-090)  Volume D Appendix D4.01 (APP-138)  Landscape and Habitat Management Strategy (Reference APP-370)	The proposed route of the coastal path during construction involves a lengthy inland diversion around the whole Wylfa Newydd site boundary. The path is to be diverted again once construction is complete. Whilst the operational routes is shorter than the route proposed during construction stage, there remains an increase in length compared to the existing length of the path and there would still be a loss of sea views.  IACC has confirmed the importance of having the route of the Coastal Path, particularly during the operation stage, positioned as close to the sea as possible in order to offer users the best coastal route option with enhanced sea views.  IACC are seeking compensation through the S106 for the loss of the coastal path during construction and for the permanent inland diversion.	The Wales Coast Path has been routed via the shortest practical route available, avoiding the Wylfa Newydd construction site. Figure 5-12 of the Landscape and Habitat Management Strategy (Reference APP-370) shows how the Wales Coast Path would be segregated from the A5025, the path would not run along the verge of the road. The impact on the length of the Wales Coast Path route between Cemlyn Bay and Wylfa Head has been mitigated so far as is possible in the context of the WNDA boundary.  While there is an increase in length over the overall Wales Coast Path route between Cemlyn Bay and Wylfa Head this key link to Wylfa Head from Cemaes has been retained. The route along the north coast between Cemaes and Wylfa Head is used regularly by local people and visitors to Cemaes and is considered to be a key link which has been considered in deciding to retain this ongoing access to the public.  A Section 106 Agreement is being negotiated with will provide funding to IACC to enable work to be undertaken on the remaining existing PRoW Network within the vicinity of the Wylfa Newydd Development Area; Off-site Power Station Facilities; adjoin the A5025 between Valley and Tregele; or comprise a section of the Wales Coast Path at any location on Anglesey.	Ongoing
		Operational phase - option of a permissive path seaward of the Power Stations	IACC 0262	Volume C Chapter C3 of Environmental Statement (APP-090)  Volume D Appendix D4.01 (APP-138)  Landscape and Habitat Management Strategy (Reference APP-370)	Preference is for a seaward route with a footbridge across the cooling water intake (see IACC PAC 3 response)  IACC are seeking compensation through the S106 for the loss of the coastal path during construction and for the inland diversion during operation.	Based on operational considerations for the Wylfa Newydd Power Station Horizon has decided that it is not appropriate to route the Wales Coast Path seaward of the Power Station. The proposed alignment for the Wales Coast Path once the Power Station is operational would provide a link between Cemlyn Bay and Wylfa Head that follows a route that is informed by the landscaping appropriate to this national route.	Ongoing
	Sustrans National Cycle Routes (NCRs)	Diversion of NCR 566 - route, safety, signage, design of off-road/on-	IACC 0263	Volume C Chapter C3 of Environmental Statement (APP-090)  Volume D Appendix D4.01 (APP-138)	Visual effects will impact on visitors and cyclists using the Copper Trail/National Cycle Network Route 566 once Wylfa Newydd is operational. The proposed naturalistic colour scheme for the site will not be enough to reduce these visual effects. The viewpoints selected underestimate the effects of the permanent diversion of the Copper Trail upon	The Copper Trail would need to be diverted along Nanner Road to provide an alternative link once Cemlyn Road has been closed. Horizon's proposal for this diversion would be for the link to follow the A5025 for a short distance and then link to Llanfechell, this would not involve further highway works but funding to IACC would be provided through the s106 Agreement to enable new NCN Route signage to be erected. It is proposed that the route would no longer pass through the village of	Ongoing

Topic	Sub topic	Issue	SoCG ID	Document Reference/Signpost/ Routemap	IACC Position	Horizon Position	RAG
		road junctions, etc		Landscape and Habitat Management Strategy (Reference APP-370)	recreational receptors. Significant adverse visual effects will be sustained along most, if not all, of the permanently diverted section, the section to the immediate West of the Wylfa Newydd Development Area (WNDA) and the more elevated sections around Mynydd y Garn. Mitigation and compensation is required and should consist of: improved signage; additional funding to promote the Cycle Route; the promotion of interlinkages with other nearby attractions (businesses, facilities and services); and improvements to the alternative route proposed to make this more attractive to visitors through enhanced landscaping and additional planting.	Tregele, though there would be no restriction on cyclists who want to cycle through Tregele as the Copper Trail is an on-road cycle route at this location.	
		NCR 5 - new off-road section alongside A5025 and design of off-road/on-road junctions, etc	IACC 0264	Volume C Chapter C3 of Environmental Statement (APP-090)  Volume D Appendix D4.01 (APP-138)  Landscape and Habitat Management Strategy (Reference APP-370)	In addition to the road improvements included in the A5025 On-line Highway Improvements new signage would be provided on the highway network where the NCN Route crosses the A5025 to the south of Llanynghenedl. No physical works to the highway are proposed.		Agreed
	Dual footpath and cycle path to be created linking the Copper Train (NCR 566) to Cemaes via Penrhyn	Proposed by Horizon in PAC 3 but not shown on any plans	IACC 0265	Volume C Chapter C3 of Environmental Statement (APP-090)  Volume D Appendix D4.01 (APP-138)  Landscape and Habitat Management Strategy (Reference APP-370)	Figure D4-6 in Volume 6 of the Environmental Statement (Application Reference 6.4.101) shows the proposed diversion of the Copper Trail. Other rights of way that are to be created during the operational phase are shown on the Landscape and Habitat Management Strategy (Application Reference APP-370). The new PRow proposed by Horizon would be unsurfaced except for paths from the new Wylfa Head car park, and therefore would not be suitable for cyclists.		Agreed
		Footpath, Cycleway and Equestrian Implementation and Management Plan	IACC 0266	Volume C Chapter C3 of Environmental Statement (APP-090)  Volume D Appendix D4.01 (APP-138)  Landscape and Habitat Management Strategy (Reference APP-370)	Several significant permanent and temporary adverse impacts are identified in relation to PRows within the WNDA and associated site development locations. During the decade-long construction phase, all 32 PRows within the WNDA will be permanently closed to enable construction. IACC accepts this on safety and security grounds. Horizon's intention to create new PRows following construction, which would link to the coastal path lacks detail and is insufficient as compensation or mitigation. This could be 10-15 years away which is unacceptable and the IACC require compensation for this loss to upgrade alternative PRows to mitigate against this impact.	The principle for the creation of a Public Right of Way network as part of the mitigation strategy has been agreed between IACC and Horizon. The PRow network proposed by Horizon are typical of the existing routes across the Wylfa Newydd Development Area, with similar surfacing except where surfaced routes are to be installed from the replacement Fisherman's Car Park to Porth yr Ogof. There are no existing bridleways in the vicinity of the WNDA and on this basis Horizon does not consider it necessary to provide new bridleways, which would lack connectivity.  The indicative route of these paths is shown in the LHMS and on the Access Plans.	Ongoing

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	Method of Assessment	Approach and method of assessment	IACC 0267	ES Volumes - Public Access and Recreation Chapters, Figures and Appendices	Methodology presented in chapter B4 of the ES. The methodology is robust.		Agreed
		All long-distance routes, PRow network, promoted recreational routes, permissive routes, access land, public open space, leisure and recreational facilities that could be affected by the development	IACC 0268	ES Volumes - Public Access and Recreation Chapters, Figures and Appendices	Methodology presented in chapter B4 of the ES. The methodology is robust.		Agreed
		All recreational initiatives including the Anglesey Cycling Strategy (adopted)	IACC 0269	ES Volumes - Public Access and Recreation Chapters, Figures and Appendices	Methodology presented in chapter B4 of the ES. The methodology is robust.		Agreed
		All aspects	IACC 0270	ES Volumes - Public Access and Recreation Chapters, Figures and Appendices	SPC, construction, operational and decommissioning phases and activities of each element of the development (including the Power Station, Site Campus, Dalar Hir Park & Ride, Parc Cybi Logistics Centre and Marine works) with the potential to significantly affect public access and recreational facilities identified and the nature of the effects described and analysed.  The methodology for assessing the potential effects of the Wylfa Newydd Project is set out in Chapter B4 of the Environmental Statement. This methodology was discussed in detail with IACC and NRW. Detailed assessments of the construction and operational effects set out in the separate volumes of the ES (C3, D4, E4, F4, G4 and H4). The methodology is robust.		Agreed
	Assessment	Assessment of direct (physical) and indirect (visual) effects on all long-distance routes, PRow network, promoted recreational routes, permissive routes, access land, public open space, leisure and recreational	IACC 0271	ES Volumes - Public Access and Recreation Chapters, Figures and Appendices	Assessment of effects on recreational amenity and physical impacts on PRow routes (including permissive routes) are presented in chapters C3, D4, E4, F4, G4 and H4 of the ES. The assessment is robust.		Agreed



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		facilities that could be affected by the development					
		Assessment of effects on all recreational initiatives including the Anglesey Cycling Strategy (adopted)	IACC 0272	ES Volumes - Public Access and Recreation Chapters, Figures and Appendices	A specific assessment of how the Wylfa Newydd Project would affect the initiatives set out in the Anglesey Cycling Strategy has not been included in the ES. However, an assessment of effects on cyclists follows the methodology set out in chapter B4 and is presented in chapters C3, D4, E4, F4, G4 and H4 of the ES.		Agreed
	Mitigation	General approach and specific measures	IACC 0273	ES Volumes - Public Access and Recreation Chapters, Figures and Appendices	Proposed mitigation is presented in chapters C3, D4, E4, F4, G4 and H4 of the ES. Further mitigation regarding improvements to the Wales Coast Path and other PRoW is provided for within the s106 Agreement		Agreed
		Compensatory measures for adverse impacts on public access and recreational facilities and visual amenity of users incapable of mitigation	IACC 0274	ES Volumes - Public Access and Recreation Chapters, Figures and Appendices	Compensation package included in DCO application following discussion with key stakeholders (see Schedule 13 of the draft revised s106 agreement issued 21 Jan 2019 and submitted at Deadline 6). Also the subject of further public consultation (Consultation on Additional Land)		Agreed
	Enhancement	Enhancement measures proposed	IACC 0275	To be provided to IACC for review and agreement	Proposed enhancement measures are presented in chapter D4 of the ES and are set out in the LHMS. See also Schedule 13 of the draft revised s106 agreement issued 21 Jan 2019 and submitted at Deadline 6.		Agreed
		To monitor the effects of the construction phase on resources and receptors and to put in place measures to remedy any effects that are not in accordance with the ES findings/DCO requirements	IACC 0276	To be provided to IACC for review and agreement	Chapters C3, D4, E4, F4, G4 and H4 are considered to set out a robust assessment of the potential effects of the Wylfa Newydd Project on public access and recreational receptors. See Schedule 13 of the draft revised s106 agreement issued 21 Jan 2019 and submitted at Deadline 6).		Agreed



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Terrestrial and Freshwater Ecology							
Terrestrial and Freshwater Ecology	Compensation	Strategy for Tre'r Gof SSSI	IACC 0277	ES Volume D Chapter D9 terrestrial and freshwater ecology (APP-128)	<p>The DCO application does not exclude the possibility of significant adverse effects on the Tre'r Gof SSSI and includes three sites where habitat creation and enhancement works are proposed to offset the anticipated effects of the development on Tre'r Gof SSSI.</p> <p>IACC needs to be assured that the compensation package is able to offset the anticipated effects, and it will refer to the specialist knowledge and advice of NRW for this assurance.</p>	<p>Horizon is working closely with Natural Resources Wales (NRW), and IACC to provide sufficient information to allow accurate consideration of the extent and quality of habitat which will be created and enhanced as part of the compensation works for Tre'r Gof SSSI. This work is currently ongoing, including soil investigation and hydrological monitoring of the compensation sites.</p> <p>Hydrological data collected between September 2018 and January 2019 were presented to NRW at a Technical Advisory Group meeting on 16 January 2018. Horizon believes that the information provides confidence in the likely success of these compensation sites. A revised approach to site design and development has been agreed which will see a staged approach to habitat creation, evaluating the success of the approach before continuing / adapting it across other areas of the sites. This revised approach will be submitted in to Examination at Deadline 6.</p>	Ongoing
	Compensation	Section 7 priority habitats	IACC 0278	<p>ES Volume D Chapter D9 terrestrial and freshwater ecology (APP-128)</p> <p>Section 7 habitat information (D5-REF)</p>	<p>IACC considers that the baseline data is not presented in a manner that allows the assessment of effects to terrestrial habitats to be easily tested and therefore the areas of each Section 7 (S.7) priority habitat that will be permanently or temporarily lost are not clear. Further information is also required with regard to the timescale over which any effects will be offset by the LHMS.</p> <p>Clarity is also required regarding the effects on S.7 habitats including the revision of Table 9-7 (ES Volume D) to identify the S.7 habitats, and the amount of each habitat permanently lost, temporarily lost and restoration amounts; this should cross-reference the NVC survey as far as possible to specifically identify the rarer and higher-value S.7 habitats. IACC requires this information so that it can review the performance of the scheme against Section 6 of the Environment (Wales) Act (2016), as this places a duty on public authorities to 'seek to maintain and enhance biodiversity' and 'promote the resilience of ecosystems'.</p> <p>The LHMS needs to demonstrate how the proposals will restore and enhance connectivity between displaced or trans located species populations in order to improve population and meta population resilience locally, with long term enhancements secured that are likely to increase the local populations of key S.7 species.</p>	<p>The Section 7 habitat information requested by IACC has been provided at Deadline 5</p> <p>Section 4 of the LHMS (REP2-039) includes a number of overarching design principles aimed at delivering a net gain in biodiversity in accordance with national planning policy. These design principles include:</p> <ul style="list-style-type: none"><li>provision of a mosaic of habitats with increases in the areas of habitats of nature conservation value compared to the baseline;increased high quality habitat provision specifically for reptiles, chough, bats, otter, water vole and red squirrel;</li><li>increased carrying capacity for all other notable terrestrial and freshwater species known to occur in the area; and</li><li>provision of habitat enhancement features in the marine structures.</li></ul> <p>Furthermore, there is a construction phase design principle which states:</p> <p><i>"Where final landscape is provided during the construction phase, it should seek to maximise biodiversity and improve habitat connectivity, both within the site and with existing habitat areas in the surrounding area, resulting in an overall net biodiversity gain."</i></p> <p>Figures 6-21 to 6-23 illustrate how the provisions of the LHMS restore and enhance connectivity across the WNDA and link into the wider landscape, providing corridors for species recolonization of the site.</p>	Ongoing

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	Scope	Reptiles	IACC 0279	ES Volume D Chapter D9 terrestrial and freshwater ecology (APP-128)  Overarching Code of Construction Practice (CoCP)	<p>The absence of survey details within the Technical Survey Report (TSR) (e.g. the area surveyed; the density of tiles; etc.) means that the survey results cannot be put into context or their robustness assessed.</p> <p>With regard to the assessment and mitigation proposals, Horizon’s core argument is that the total loss of all available habitat within the development site; the displacement or translocation of reptiles to off-site areas several hundred metres away for the duration of the build; and the associated fragmentation of habitats and populations at the district scale will be fully mitigated in the short- to medium-term by the provision and enhancement of the ‘receptor areas’, and the restoration of the site habitats in the long-term. It concludes that the effects on the integrity of reptile populations would therefore be negligible. The IACC does not accept that this case has been made.</p> <p>Essentially, the success of the long-term measures outlined in the plan will be dependent upon reptile populations remaining present and viable in the local area throughout the duration of construction. Furthermore, there is no intention in the LHMS to re-translocate animals from the receptor sites to the restored areas, despite the Power Station site presenting a significant dispersal barrier.</p> <p>Further detail regarding the proposed construction mitigation measures are required in the Wylfa Newydd Main Site CoCP, including:</p> <ul style="list-style-type: none"><li>• Confirmation of the areas within the site where trapping / translocation is to be undertaken;</li><li>• Confirmation of how many reptiles are expected in these areas;</li><li>• Detail of the precise phasing, timing, speed and direction of site clearance at a field level (i.e. the displacement programme needs to demonstrate that reptiles will not become isolated within the site, and that the rate of clearance is appropriate to the rate of species movement);</li><li>• Detail of the provisions for monitoring populations during the construction period; and</li><li>• Details of the provisions for intervention if the short- and medium-term measures</li></ul>	<p>Surveys focused on good quality habitats for reptile foraging / shelter across the site and therefore provide robust data on presence, species composition and population size. Horizon will provide IACC with any relevant raw data available in relation to reptiles surveys referred to in the reptile technical summary report (APP-117).</p> <p>Measures to mitigate killing / injury of reptiles include the strategy to both trap and translocate individuals, and to destructively search areas. All captured individuals would be translocated to receptor sites which are being enhanced to provide high quality reptile habitat, and therefore a high carrying capacity. The clearance of vegetation and structures offering shelter would be undertaken in a direction manner, from east to west, encouraging animals to move away from hard barriers (Cemaes village and the A5025), and towards connected off-site habitat, including the reptile receptor area and the notable wildlife enhancement area, which also provides high quality habitat and carrying capacity for both adder and common lizard. The habitats immediately adjacent to the Wylfa Newydd Development Area (WNDA) provide similar quality reptile habitat to those found within the WNDA so animals are not anticipated to move from higher quality into lower quality habitats, but into adjacent habitats of similar quality to those they are displaced from. Fragmentation issues would be addressed through this mitigation strategy, although the precise details of the strategy would be determined prior to clearance following an assessment of habitat suitability across the WNDA.</p> <p>Re-translocation of species is not usually undertaken given the stress trapping and translocation of animals generates. Recolonisation of the WNDA along the strengthened corridors of refuge and foraging habitats created as part of the LHMS is a preferred approach. However, Horizon will retain the option for active re-introduction of reptiles across the WNDA should it be considered following monitoring of the success of the strategy, that this was appropriate.</p> <p>Confirmation of the precise mitigation and monitoring strategy will be provided following pre-construction surveys of habitat suitability and will form part of the Main Site sub-CoCP, a revised version of which will be submitted into Examination at Deadline 5 (12 February 2019).</p> <p>The survey reports which inform the reptile technical summary report (APP-177), will be submitted into Examination at Deadline 5 (12 February 2019).</p> <p>The LHMS is currently being updated by Horizon and will be submitted into Examination at Deadline 5 (12 February 2019). The provisions of this document (section 7.2) includes that:</p> <ul style="list-style-type: none"><li>• monitoring is undertaken of species translocations [including reptile translocation], to assess the efficacy of the mitigation provided; and</li><li>• management schemes will seek to ensure the reptile receptor site and notable wildlife enhancement site, the latter being available as contingency site for the reptile receptor site, provide suitable habitats for reptiles which have been displaced / translocated until</li></ul>	Ongoing

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					<p>associated with the receptor sites are not shown to be successful by monitoring. Within the Local Impact Report for the Wylfa Newydd Development Area (REP2-077), IACC stated it would require a programme of monitoring of the reptile population during the construction and the establishment and ongoing management of the provisions of the LHMS.</p> <p>IACC await the data being provided at Deadline 5. With regard to the LHMS update and reference to Section 7.2, the monitoring proposals are still to be agreed following the hearing sessions; we note that the Section 7.2 provisions noted by Horizon remain somewhat ambivalent ('will seek' rather than 'will'; 'until new habitats have been created' rather than (e.g.) 'until new habitats have matured')</p>	<p>new habitats have been created on the landform surrounding the Power Station Site.</p>	
	Scope	Bats	IACC 0280	ES Volume D Chapter D9 terrestrial and freshwater ecology (APP-128)	<p>There are several deviations from established survey guidance (both currently, and at the time of survey) that are not explained, and which could affect the characterisation of the baseline. These deviations need to be explained.</p> <p>Beyond this, the mitigation alluded to in the ES documentation (and its relationship to the assessment of effects) is not clear, particularly with regard to the mitigation proposed for the loss of roosting opportunities.</p> <p>The current commitment to roost provision does not offset the loss of roosting opportunities site-wide during the construction period, and there are no firm commitments regarding the future provision of roosts in the LHMS. The works proposed will remove almost all trees with features that could be used by roosting bats, for a substantial period of time. The provision of bat boxes in the short and long-term should reflect this loss.</p> <p>It was also identified that the schedule of known bat roosts being lost as a result of the WNDAs was inaccurate as the Gardener's Cottage and outbuildings was marked as being retained whereas it would be lost as part of the works.</p> <p>05/02/19: Ongoing. No new information provided by Horizon; dependent on further discussions regarding roost provision]</p>	<p>Horizon believes the data regarding bats, collected during a number of years' survey within the WNDAs, provides a robust baseline against which to assess and propose mitigation for effects on the extant bat population.</p> <p>In agreement with NRW, the decision has been taken to approach mitigation for bats in a holistic fashion to maintain the favourable conservation status of the extant bat population rather than taking a piecemeal approach to offset each potential or confirmed roost feature. A draft European Protected Species (EPS) mitigation licence application has been provided which details mitigation and compensation measures for all of the known roost structures, and for the loss of potential roost sites in trees incurred as part of the Wylfa Newydd Development. The provision of forty bat boxes forms part of this holistic strategy.</p> <p>However, dedicated tree surveys (in accordance with the latest best practice guidance) would be undertaken prior to felling, and any felling of identified roosts would be covered by a separate licence application. All mitigation requirements within the EPS mitigation licences would be secured through the Ecology and Landscape Management Strategy within the Main Power Station Site sub-CoCP, a revised version of which will be submitted into Examination at Deadline 5 (12 February 2019).</p> <p>In light of the discrepancy between the demolition schedules for buildings within the WNDAs, and those identified for retention in the Figure D9-5 (APP-238), Horizon will review all relevant documents to ensure consistency.</p>	Ongoing

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	Scope	Great crested newt	IACC 0281	ES Volume D Chapter D9 terrestrial and freshwater ecology (APP-128)	<p>The broad mitigation proposals for safeguarding GCN during construction are set out and are likely to be successful. The key issue is the long-term enhancement of the site through the LHMS. IACC notes that whilst the LHMS discusses the benefits of the terrestrial habitat restoration for GCN, it remains unclear as to how this ‘enhancement’ will be realised when there is no explicit commitment for the replacement of ponds (without GCN) lost during construction.</p> <p>The significant reduction in pond numbers across the site will largely remove the possibility of meaningful future colonisation of the site by this species. At a local scale, therefore, the proposals do nothing to improve the resilience of GCN populations or their conservation status in the opinion of IACC. IACC has not received the detailed information which confirms the detail of the new ponds.</p>	The LHMS (REP2-039), is being updated to include the provision of nine ponds to offset those ponds being lost as part of the WNDA. The ponds being created will be managed through the provisions of the LHMS for the period of the Main Power Station’s operation.	Ongoing
	Scope	Red squirrel	IACC 0282	ES Volume D Chapter D9 terrestrial and freshwater ecology (APP-128) Main Power Station Site Sub-CoCP	<p>The ES conclusion (‘negligible significance’) is based on the loss of 3 ha of habitat suitable for red squirrel and the retention of 10.5 ha associated with the Dame Sylvia Crowe Mounds (DSC Mounds). This would be offset by the provision of 22 ha in restoration. In the opinion of IACC the ES conclusion underplays the potential significance of short-term habitat loss and the isolation of the DSC mound for 10+ years. It should therefore be assumed that the population using the site will be lost for the duration of the works at least, and probably longer.</p> <p>The loss of a 'low' population of red squirrel is significant in a local context but perhaps less so taking the population of Anglesey into account. The RSST estimates that the population of red squirrels on Anglesey is approximately 700, which would be the largest population in Wales, although it remains fragmented. On this basis the magnitude of change is arguably 'medium' in the short- and medium-term, with the prospect of an appropriate LHMS eventually mitigating this in the long-term (once connecting woodland is established). The LHMS needs to be designed to facilitate re-colonisation from local known populations and should include provision for at least one woodland block over 10 ha.</p> <p>IACC have reviewed the paper provided by Horizon following the hearing sessions, but are unsure whether further information will be provided at Deadline 5. We remain to be persuaded that the</p>	<p>Pre-construction surveys are proposed for red squirrel, the results of which would inform any final mitigations strategy and (if required) conservation licence application. The habitat within Dame Sylvia Crowe’s Mound is available to support red squirrel during the construction period, albeit it an isolated area of habitat. Horizon would monitor and manage this area, together with the provision of a supplementary feeding regime, to maximise the opportunity for this population to be maintained.</p> <p>The woodland at Dame Sylvia Crowe’s Mound would be retained throughout construction and operation, with the LHMS (REP2-039), proposals to create at least 25ha of woodland within the WNDA strengthening the habitat availability within the WNDA. Woodland areas would be connected by hedgerow habitat providing a greater resource of suitable red squirrel habitat than currently exists on site.</p> <p>At Deadline 5 (12 February 2019), Horizon will submit into Examination a technical note providing reference to published literature on the requirements of red squirrel in fragmented habitat.</p>	Ongoing



Topic	Sub topic	Issue	SoCG ID	Document Reference/Signpost/ Routemap	IACC Position	Horizon Position	RAG
					inferences drawn from the literature referred to can be robustly applied to the situation at Wylfa.		
	Scope	Chough	IACC 0283	ES Volume D Chapter D9 terrestrial and freshwater ecology (APP-128) Workforce Management Strategy (APP-413) 2018 survey report	<p>IACC does not agree that the loss of 'most habitats' for 10 - 15 years would constitute a medium magnitude of change except if considered solely over the long-term with the assumption that re-colonisation will be rapid. In the opinion of the Council, the 'medium' magnitude of change (and hence of 'moderate adverse' significance), before additional mitigation is applied is underplayed, based on the disproportionate use by chough of the area directly affected by the site campus (field 146 accounting for &gt;63% of foraging time in 2017 surveys).</p> <p>The commitments of the LHMS might have some incidental benefits for chough, but benefits are being claimed for many species groups with different requirements. In the case of choughs, IACC considers that the 100ha of coarse-sward species rich grassland referred to at paragraph 9.5.215 of ES Volume D – WNDA Development D9, would be sub-optimal for chough being some distance from the nest sites and therefore of limited value.</p> <p>Disturbance of chough due to visitor pressure associated with the site campus is not considered to any great extent and particularly in relation to cumulative effects with habitat loss. Since chough will be reliant on a smaller area of sub-optimal foraging habitat at Wylfa Head which will be liable to visitor pressure from the site campus it will be critically important to establish appropriate visitor management practices to prevent a significant impact from occurring.</p> <p>No new information has been provided by Horizon; further review is dependent on a revised WMS and explicit commitments regarding wardening etc.</p>	<p>Horizon considers their assessment of effects both pre and post additional mitigation to be robust. To support this statement, management of Wylfa Head since winter 2017, including mechanical removal of scrub and the reintroduction of sheep grazing, has been seen during the 2018 chough surveys to have led to the use of Field 146 for foraging reducing significantly, with a reversion back to Wylfa Head and the areas closest to the nest sites. The report detailing the findings of the 2018 surveys has been submitted to IACC for information and will be submitted into Examination at Deadline 5.</p> <p>In addition to the provision of 120ha of coarse-sward species-rich grassland, the LHMS (REP2-039), includes a design principle for the provision of 20ha of close sward species rich grassland, which would be suitable for foraging chough. A further LHMS design principle states “A net increase in the abundance of suitable chough foraging habitat should be provided, in particular within 300m of existing nest locations and potential future nest locations along the coast to the east of Wylfa Head.” In combination, these design principles will ensure that 25ha of suitable chough foraging habitat is provided, primarily within 300m of chough nest locations.</p> <p>The Workforce Management Strategy (APP-413) would provide approaches to minimise effects from worker pressure on Wylfa Head and chough through preventing direct access onto the area from the Site Campus (the only access would then be an approximately 4.7km walk from the Site Campus to the Wylfa Head). Information on the site and its species' sensitivities, together with warning signage during key sensitive breeding periods, and monitoring of the area by the Ecological Clerk of Works (ECoW) during key sensitive breeding periods are designed to mitigate potential disturbance effects.</p>	Ongoing
	Scope	Trwyn Pencarreg Wildlife Site	IACC 0284	ES Volume D Chapter D5 air quality (APP-124) ES Volume D Chapter D9 terrestrial and freshwater ecology (APP-128) Workforce Management Strategy (APP-413)	<p>The submission does not consider the Trwyn Pencarreg Wildlife Site. This must be completed, including an assessment of the potential effects of increased visitor pressure due to the population of the site campus. The assessment will inform the details of further mitigation and compensation requirements.</p> <p>IACC will review the updated WMS that is to be provided at Deadline 5. The Workforce Management Strategy needs to provide details of the approaches to minimize effects from worker pressure on</p>	<p>Horizon recognises there is a discrepancy between the air quality assessment with respect to Trwyn Pencarreg Wildlife Site presented in chapter D5 air quality (APP-124), and that presented in chapter D9 terrestrial and freshwater ecology (APP-128).</p> <p>Horizon has committed to additional mitigation regarding reducing the emissions of NOx from construction plant in the DCO submission. This will act to reduce adverse air quality effects at all ecological receptors. The Air Quality Mitigation Quantification report (REP3-052) considers Horizon's proposals to reduce NOx emissions screens out Trwyn Pencarreg Wildlife Site from requiring further ecological assessment.</p>	Ongoing



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					designated sites and key species through directing off-site access south through the construction site	In relation to potential disturbance effects on the sensitive habitats within Trwyn Pencarreg through increased visitor pressure from residents of the Site Campus, the distance between the Site Campus and the boundary of the wildlife site is in excess of 6km (a return distance of over 12km). Based on this, and the provisions of the Workforce Management Strategy to provide suitable on-site entertainment for workers (APP-413), disturbance to Trwyn Pencarreg is not considered a pathway to a potential adverse effect on the site.  The assessment of effects on Trwyn Pencarreg as presented within chapter D9 is therefore considered robust.	
	Mitigation	The 'Strategy for Mitigation' will be developed in line with the ES and Mitigation Route Map for submission and agreement with IACC during DCO Examination.	IACC 0285	ES Volume D Appendices D11.02a - D11.03d (APP-204 to APP-209) Mitigation Route Map (submitted at Deadline 6))	IACC understands that HNP undertaken work at Tyddyn Gele and Nant Orman but have not to date supplied the relevant reporting.	The Mitigation Strategy will include any residual Investigation activities not undertaken and completed before DCO Examination commenced.	Ongoing
Cultural Heritage							
Cultural Heritage	Method of Assessment		IACC 0286	ES Volume B Chapter B11 (APP-076)	The valuation of built heritage assets which may be affected by the proposed scheme should be reconsidered using a methodology more closely aligned to the approach set out in NPS EN-1 5.8.2 and the Conservation Principles (CADW 2011).  However, IACC is prepared to accept that this issue does not affect the vast majority of assessments with IACC content to address any issues in the context of individual assessments of effects on specified heritage assets or specific mitigation measures.	As detailed in chapter B11 Volume B - Introduction to the environmental assessments B11 - Cultural heritage (APP-076) paragraph 11.4.16 “ The assessment of value is based on professional judgement informed by the criteria presented in table B11-11, which has been developed with reference to Conservation Principles.”. The Conservation Principles have therefore been taken into consideration in the assessment of value as presented in chapter D11. The approach adopted is considered to be consistent with the requirements of NPS EN-1 and NPS EN-6	Ongoing
	Baseline and Data Collection	Significance of archaeological discoveries identified following archaeological investigations	IACC 0287	ES Volume D Chapter D11 (APP-130)	Horizon’s assessments fail to properly consider the significance of the archaeological discoveries that have been revealed to date following the archaeological investigations. Accordingly, the policy test regarding significant harm to non-designated heritage assets of equivalent significance to scheduled monuments has not been met.  The ES should be updated to reflect the significance of the discoveries that have been revealed to date, and as some sites in the submissions have been currently undervalued, re-assess the impacts on these sites.	The sources used to establish the baseline were identified in section 11.3. As stated in para 11.3.4 of chapter D11: “... <i>information from the results of the archaeological investigations undertaken in 2017 was used to inform the assessment of value for the following archaeological remains:</i> <ul style="list-style-type: none"><li><i>Pennant Enclosure and Cist Cemetery (Asset 205);</i></li><li><i>Tregele Romano-British Settlement (Asset 540);</i></li><li><i>Romano-British Settlement, East of Tyddyn Gele (Asset 547);</i></li><li><i>Romano-British Settlement, North-east of Tyddyn Gele (Asset 566)</i></li><li><i>Roman Settlement, North-west of Tregele (Asset 567);</i></li><li><i>Stone Trackway, North-west of Tregele (Asset 568);</i></li><li><i>Porth yr Ogof Roman Settlement (Asset 573);</i></li><li><i>Linears, Pits and Postholes, West of Porth Wylfa (Asset 575);</i></li></ul>	Ongoing

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					<p>The clarity on this issue provided during the examination is welcomed and this list of heritage assets is accepted as a statement of those features which are considered to be of this value.</p> <p>It is noted at NPS EN-1 5.8.19 ‘the ability to record evidence of the asset should not be a factor in deciding whether consent should be given’. Therefore, a statement of overriding need is required regardless of the effectiveness of mitigation.</p> <p>IACC do not consider that this issue can be readily agreed without the provision of a statement of overriding need.</p> <p>IACC would be content to accept that recording and interpretation/engagement mitigation is appropriate in principle, if a clear need for the harm can be demonstrated.</p> <p>IACC reserves comment on the acceptability of the specific mitigation until such times as the detailed proposals are agreed.</p>	<ul style="list-style-type: none"><li>• <i>Roman Industrial Activity, West of Porth Wylfa (Asset 577);</i></li><li>• <i>Neolithic Flint Processing Site, West of Porth Wylfa (Asset 579);</i></li><li>• <i>Porth Wylfa Cist Cemetery (Asset 580); and</i></li><li>• <i>Ditch and Pits, South of Porth Wylfa (Asset 587).</i> “</li></ul> <p>It is therefore Horizon’s position that the archaeological discoveries that have been revealed to date following the archaeological investigations have been taken into account. Further summary reports will be provided in the examination, anticipated at Deadline 6.</p> <p>In addition, given that the effects can be mitigated by preservation by record, and this has been accepted by Cadw and GAPS, it is not accepted that the effects on non-designated archaeological remains are commensurate with substantial harm.</p>	
		Assessment of Value – Dame Sylvia Crowe Landscape (HLT3)	IACC 0288	ES Volume D Chapter D11 (APP-130)	<p>It is IACC’s assessment that the value of the Dame Sylvia Crowe Landscape has been understated and the value/heritage significance of HLT3 should be high as a consequence of its high evidential, historical and aesthetic values and medium communal value. The Dame Sylvia Crowe Landscape (HLT3) is historically, functionally and aesthetically linked to the adjacent existing power station (HLT8) and is also contained within the Wylfa Cultural and Historic Aspect Areas assessed in LANDMAP to be of Outstanding cultural and historic significance (CL010 and HL055). Therefore, the medium value ascribed to HLT3 does not accord with the high value given to HLT8 which forms the remainder of these aspect areas.</p> <p>IACC are content to agree in principle that harm can be mitigated, but reserves comment on the acceptability of the specific mitigation until such times as the detailed proposals are agreed.</p>	<p>The basis for the value of the assessment is set out in Appendix D11-5 Assessment of the Significance of Dame Sylvia Crowe’s Landscape Design at the Existing Power Station (APP-212). As noted this based primarily on historical association. Horizon are therefore content that the assessment of the value as medium is appropriate and that the mitigation identified in chapter D11 (cultural heritage) (APP-130) is appropriate to the value of the asset and the impact predicted.</p>	Ongoing
	Analysis of Proposed Development	Design of the Western Breakwater	IACC 0289	ES Volume D Chapter D11 (APP-130)	<p>There needs to be a design submitted for the re-modelling of the west breakwater at the end of the construction phase, to give it a more natural appearance/profile so that it appears more like a vegetated rocky island for the duration of the operational and decommissioning phase (rather than an engineered structure). This is required to reduce the long-term impact on the Significant Views and other views from Cestyll Garden.</p>	<p>A breakwater was incorporated to provide protection to allow the wave condition requirements at the cooling water intake structure. The breakwater has been developed to the minimum height and length to provide the protection required to allow optimal performance of the intake. A smaller, lower breakwater would not provide the required protection.</p> <p>The breakwater would also afford protection and shelter to increase the uptime of the MOLF berths for the throughput of materials required in construction of the project.</p>	Ongoing

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					IACC welcome proposals to reduce the visual impact of the breakwater, but reserves comment on the acceptability of the specific mitigation until such times as the detailed proposals are agreed.	While Horizon therefore do not consider that it is possible to implement the design changes proposed by the IACC, as part of the design development, the design of the western breakwater now includes areas of rock armour on the leeward side which will be seeded with natural rock won from the site where practicable. While this design development will not reduce the residual significance of effect on Cestyll Garden it would slightly soften the appearance of the western breakwater in views from the valley garden.	
	Assessment	Assessment of Effects on Cestyll Garden and Felin Gafnan Corn Mill	IACC 0290	ES Volume D Chapter D11 (APP-130)  Main Power Station Site Sub-CoCP	<p>There needs to be clarity regarding the combined impacts (noise, dust, vibration, lighting, visual impact, etc.) on Cestyll Garden and its associated Grade II* Listed Building (Corn Mill), and the measures proposed to mitigate these as much as possible.</p> <p>With reference to Horizon’s position, IACC consider that this represents a clear statement of the potential effects of the proposed scheme.</p> <p>IACC reserve any agreement on the effectiveness of the proposed mitigation until IACC have agreed on the scope of the s106 and the proposed restoration of lands within the designation within the WNDA.</p> <p>The production of a detailed CMP would provide a robust and transparent evidence-based framework for determining detailed mitigation.</p>	<p>As identified in paragraphs 11.5.32 to 11.5.40 of chapter D11 (cultural heritage) (APP-130) potential effects on Cestyll Garden during construction would result from:</p> <ul style="list-style-type: none"><li>• Removal of the kitchen garden;</li><li>• Removal of the plot of land where Cestyll House formerly stood;</li><li>• Removal of part of the kitchen garden;</li><li>• Changes in air quality potentially affecting plants within the valley garden;</li><li>• Noise intrusion from construction, especially construction of the temporary causeway, proposed breakwaters and the MOLF. This assessment was supported by the noise assessment presented in D6 (noise and vibration) (APP-125) (see especially figures D6-3 to D6-10) (APP-237 and APP-238).</li><li>• Visual intrusion, including visual intrusion from the into the valley garden and the Essential Setting of the garden, significantly detracting from its tranquil character, and the temporary causeway and the breakwater would be dominant and incongruous in the Significant View from the garden.</li></ul> <p>Potential effects on Felin Gafnan Corn Mill during construction were presented in para 11.5.21 and 11.5.22 of D11 (cultural heritage) (APP-130). As stated in para 11.5.22 potential effects during construction on Felin Gafnan Corn Mill construction of Power Station and the Marine Works would introduce noise and visual intrusion into the setting of the mill, transforming its tranquil coastal setting and introducing intrusion into the views of the mill from Cestyll Garden and the Wales Coast Path. This assessment was supported by the noise assessment presented in D6 (noise and vibration) (APP-125) (see especially figures D6-3 to D6-10) (APP-237 and APP-238). A historic building survey and recording will be undertaken of the remaining outbuilding to a Level 4 standard. This will provide a drawn and photographic record of this heritage asset.</p> <p>The s.106 agreement also commits that, In the event that the undertaking of the project causes structural damage Felin Gafnan Corn Mill, Mill House at Felin Gafnan, and the Corn-drying House at Felin Gafnan ("<b>properties</b>"), the Developer will meet the owner of properties' reasonable costs of making repairs.</p> <p>Horizon will further consider the effects of lighting on Cestyll Garden and Felin Gafnan Corn Mill during operation.</p>	Ongoing

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		Justification of substantial harm to Cestyll Garden	IACC 0291	ES Volume D Chapter D11 (APP-130)	<p>Horizon has not yet demonstrated that the need for the development is overriding such that it warrants the loss of the Kitchen Garden, house plot, driveway and part of the Essential Setting. The demonstration of need provided by Horizon is not specific to the loss of the historic assets.</p> <p>Furthermore, the NPS EN-6 AoS noted that Air quality and noise impacts on Cestyll could be ‘readily mitigated’. Given the predicted noise levels, it does not appear that this is the case. The AoS also notes that landscaping and design mitigation would be used to minimise effects on Cestyll. These assumptions appear to have been, at best, partially met and justification for this deviation from the AoS assumptions needs to be more fully set out.</p>	<p>The Wylfa Newydd Project Planning Statement (APP-406) provides details on the need for the Project and the urgent need for a number of new nuclear power stations at identified sites, including at Wylfa. Chapter D2 Alternatives and Design Evolution in the Environmental Statement (APP-121) identifies alternatives considered for locations of some components of the Power Station. Chapter A4 (strategic alternatives) (APP-058), which outlines the need for the Wylfa Newydd Project and the strategic alternatives considered. Volume 2 (Wylfa Newydd Development Area) of the Site Selection Report (APP-437) provides further detail on the options that have been considered in determining the layout of the WNDA Development.</p> <p>Appendix A to the Wylfa Newydd Project Planning Statement (APP-406) identifies the need for the location of the construction laydown area which contributes to the substantial harm to Cestyll Garden.</p> <p>Mitigation for Valley Garden and Kitchen Garden and the essential setting includes:</p> <ul style="list-style-type: none"><li>• photographic survey of gardens;</li><li>• Level 2 historic building recording;</li><li>• photographic survey of settings and inter-visibility between gardens, buildings and associated settings; and</li><li>• Level 2 topographic and landscape survey.</li></ul>	Ongoing
		Felin Cafnan Mill (Grade II* Listed Building) - assessment of substantial harm	IACC 0292	ES Volume D Chapter D11 (APP-130)  Main Power Station Site Sub-CoCP	<p>The DCO submission does not offer a statement as to whether these effects would constitute harm in policy terms, and no judgement is offered as to whether harm would be of substantial magnitude. The magnitude of change to setting during construction through visible and audible change to setting combined with light pollution and change to air quality could also approach or even amount to substantial harm, even where material damage through vibration could be avoided.</p> <p>Horizon’s current position does not consider the permanent and irrevocable change to views out into Porth-y-Pistyll or into the WNDA, nor the change of character to the area presently part of the wider Cestyll garden designation. IACC also consider that the 10-year construction period is a significant length of time and that the magnitude of the potential effect should not be dismissed as temporary.</p> <p>There needs to be clear statement of the magnitude of the harm to the Corn Mill in policy terms.</p>	<p>This has been set out in para 11.7.13 of chapter D11 (APP-130) which states that:</p> <p><i>“11.7.13 In addition, while the major adverse short-term residual effect on Felin Gafnan Corn Mill, Porth y Felin (Asset 137) during construction is a significant effect, as it is not permanent it would not result in a permanent and substantial loss of the value (significance) of this heritage asset and therefore has not been assessed to be substantial harm.”</i></p> <p>A historic building survey and recording will be undertaken of the remaining outbuilding to a Level 4 standard. This will provide a drawn and photographic record of this heritage asset. The s.106 agreement also commits that, In the event that the undertaking of the project causes structural damage Felin Gafnan Corn Mill, Mill House at Felin Gafnan, and the Corn-drying House at Felin Gafnan ("<b>properties</b>"), the Developer will meet the owner of properties' reasonable costs of making repairs.</p>	Ongoing
		Corn drying house) and the Mill House at Felin Gafnan –	IACC 0293	ES Volume D Chapter D11 (APP-130)	It is agreed that the assessment of effects for the Corn Drying House and Mill House, which will include a change to setting which would give rise to harm but not substantial harm. Mitigation is possible through satisfactory overall landscaping proposals that fully appreciate the historic environment.		Agreed



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		assessment of impact					
		Non-designated archaeological remains of high value - justification for substantial harm	IACC 0294	ES Volume D Chapter D11 (APP-130)	<p>NPS EN-1 sets out that archaeological heritage assets may be of equivalent significance to scheduled monuments (5.8.4) and where they are of this significance that they should be subject to the same policy provisions (5.8.5). Consequently, robust justification should be provided to explain why the magnitude of harm that would arise to such significant heritage assets in order to achieve the public benefits of the scheme cannot be avoided.</p> <p>The NPS EN-6 Appraisal of Sustainability considered the principles of the development rather than the specifics of potential harm to then, unknown heritage assets. IACC consider that the generalised benefits of the scheme as a whole can therefore not be used as justification for harm unless it can be demonstrated where this harm is necessary in order to achieve the benefits of the scheme (NPS EN-1 5.8.15). IACC also consider that where effects would arise as a result of development that is not required for the operation of the proposed development (e.g. the accommodation campus) that the need for a statement of overriding need, setting out how these issues have been considered in design decisions is particularly pressing.</p>	<p>The Wylfa Newydd Project Planning Statement (APP-406) provides details on the need for the Project and the urgent need for a number of new nuclear power stations at identified sites, including at Wylfa. Chapter D2 Alternatives and Design Evolution in the Environmental Statement (APP-121) identifies alternatives considered for locations of some components of the Power Station. Chapter A4 (strategic alternatives) (APP-058), which outlines the need for the Wylfa Newydd Project and the strategic alternatives considered. Volume 2 (Wylfa Newydd Development Area) of the Site Selection Report (APP-437) provides further detail on the options that have been considered in determining the layout of the WNDA Development.</p>	Ongoing
		Assessment of the change to setting of off-site heritage assets	IACC 0295	ES Volume D Chapter D11 (APP-130)	<p>Further information regarding how noise levels have been determined including confirmation as to what specific elements of construction would cause increased noise. This will further inform the appropriate mitigation proposals.</p> <p>Confirmation as to whether other listed buildings located closer to the construction site than the Church of St Padrig have been considered and impacts assessed. If effects have been dismissed this should be confirmed or further assessment carried out to inform suitable mitigation proposals. This should include consideration of Cemaes Mill and Ty Cefn, Cemlyn.</p> <p>In response to Horizon’s current comment, IACC are prepared to accept that the conclusion is correct where the reasoning behind it is appropriately set out in line with guidance.</p>	<p>As identified in chapter D11 (cultural heritage) (APP-130) this assessment was supported by the noise assessment presented in D6 (noise and vibration) (APP-125) (see especially figures D6-3 to D6-10) (APP-237 and APP-238). It took into account the contribution that the existing noise environment made to the value of a heritage asset (based on professional judgement informed by site inspections) and change to that environment that could result from construction or operation of the project, based on the results of noise modelling presented in chapter D6 (noise and vibration).</p> <p>Please refer to appendix D11 appendix D11-6 (effects on heritage assets) (APP-213) for the assessment of effects on Windmill, Cemaes (Asset 258) and Ty Cefn, Llanbadrig (Asset 135).</p>	Ongoing
		Loss of historic assets/structure	IACC 0296	ES Volume D Chapter D11 (APP-130)	<p>Where it is confirmed Asset 138 (Nant Orman, Cemaes) and Asset 163 (Tre’r Gof Uchaf, Cemaes) are of equivalent significance to listed buildings, a statement should be provided to demonstrate why</p>	<p>The results of the Level 3 Historic Building recording of Nant Orman (Asset 138) undertaken by GAT (Davidson, J. 2012. Wylfa Archaeological Building Recording Report (GAT Report 1066)) was reviewed. Based on</p>	Ongoing



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		s within the site boundary			<p>the loss of these heritage assets is unavoidable in order to gain the significant public benefits of the proposed scheme in line with NPS EN-1 5.8.15. Appropriate mitigation or offsetting proposals taking into account that level of significance should be proposed.</p> <p>If these assets are judged to be of lesser significance than designated heritage assets, mitigation proposals are required to address adverse change to the significance of these assets. The extent and nature of any mitigation would depend on the significance of these heritage assets, although if it is considered that they are of lesser significance than designated heritage assets then it is likely that the investigation and recording proposed in the ES will represent an appropriate means of mitigation.</p>	<p>this review, the value of this historic building has been revised from medium to low.</p> <p>Historic building recording of Tyddyn Gele and Tyddyn Gele Garage (Asset 263) has been undertaken and report is being prepared (GAT, in prep.). The survey found that while the layout of Tyddyn Gele is little changed since the late 19th century, the entirety of the exterior and interior of the main house has been substantially renovated and modernised in recent years, and a significant proportion appears to have been entirely rebuilt. The roof, windows, floors, doors and fireplaces are all modern and all walls are recently rendered or plastered. The results of the historic building recording therefore support the assessment of low value presented in chapter D11 (cultural heritage) (APP-130) of the ES.</p> <p>Both heritage assets are considered to be lesser significance than designated heritage assets. Measures to mitigate effects on these heritage assets are presented in Appendix D11-6.</p>	Ongoing
	Mitigation	Cestyll Garden – Adequacy of Mitigation, Compensation and Enhancement and securing mechanism	IACC 0297	ES Volume D Chapter D11 (APP-130)	<p>The compensation measures proposed (a photographic survey of the garden, interpretive signage and future public access) are not adequate to compensate for the losses and impacts identified in the view of IACC.</p> <p>Horizon has not provided sufficient mitigation and compensation for the losses and impacts identified and it has not included sufficient detailed information to satisfy IACC that appropriate mitigation and compensation will be secured. The development of a more detailed and specific Conservation Management Plan would be an appropriate means to set out specific mitigation and compensatory measures (see summary of mitigation and compensation measures below). This plan (or at a minimum its outline) should be a certified document per the DCO.</p> <p>In conclusion, IACC are prepared to accept that effects on Cestyll can be mitigated in principle where a) the need for the magnitude of harm to arise can be established and b) where these measures can be adequately secured. IACC, consider that the mitigation as proposed is not adequately secured and reserve comment on the effectiveness of specific mitigation measures until detailed proposals are agreed.</p> <p>IACC also requires a range of mitigation and compensation measures to be secured by way of the DCO requirements which include the following;</p> <ul style="list-style-type: none"><li>• Compilation of a register of plants growing in Cestyll Garden (Registered areas and Essential Setting),</li></ul>	<p>Mitigation for effects on Cestyll Garden are set out in Section 11.6 of chapter D11 (cultural heritage) (APP-130) and are considered appropriate.</p> <p>The mitigation includes the commitment to work with the landowners and other interested parties to consider appropriate enhancement measures such as greater interpretation including on-site interpretation boards at the valley garden, enhanced public access to the valley garden, regular maintenance and restoration of the valley garden.</p> <p>The s106 agreement commits to the following principles:</p> <ul style="list-style-type: none"><li>• If Horizon owns Cestyll Garden, it will develop and thereafter implement a conservation management plan by Implementation</li><li>• If Horizon does not own Cestyll Garden, it will use reasonable endeavours to work with the landowner to develop and implement a conservation management plan by the first anniversary of Implementation, and will fund that</li><li>• If it is not possible to deliver either of the above, then Horizon will make a payment to IACC to fund mitigation of other historic assets.</li></ul> <p>As identified in para 11.6.2 of chapter D11 (cultural heritage) (APP-130) additional mitigation measures would be secured through inclusion in section 12 of the Wylfa Newydd CoCP (D5-REF), the Main Power Station Site sub-CoCP (D5-REF) and the Marine Works sub-CoCP (APP-416) being secured through DCO requirements or would be secured through the Section 106 Agreement to be entered into between Horizon, the Isle of Anglesey County Council (IACC) and others that have an interest in the land.</p> <p>An inventory of plants identified in appendix D11-4 Assessment of the Significance of Cestyll (Grade II) Registered Historic Park and Gardens Final Report (APP-211). In addition, mitigation identified in D11 already includes the commitment to “Consult with the landowner to implement</p>	

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					<p>ascertaining whether there are any rarities and identifying and implementing measures to safeguard these.</p> <ul style="list-style-type: none"><li>• The preparation of a comprehensive record of Cestyll Garden (Registered areas and Essential Setting), including the parts of the asset that will be lost (or temporarily lost as even temporary loss and reinstatement is a loss of significance), to advance the understanding of the significance of the asset. This evidence to be published and deposit copies of the report to be provided to the HER and a local museum. This would be used to form the basis for any ongoing management and restoration proposals.</li><li>• Prevent the loss of any part of the Registered area and Essential Setting (and/or future Statutory area) until there is reasonable certainty that the relevant parts of the development are to proceed. (This could be achieved through Phasing requirements).</li><li>• That the Kitchen Garden (and any other parts of the Registered and/or Statutory areas that have been affected) are reinstated using the existing materials retained for this purpose, as soon as possible during the construction phase, with the reinstatement to be carried out in line with detail agreed in the relevant CoCP.</li><li>• That a Conservation Management Plan is prepared that draws on the enhanced understanding provided by recording to set out measures to protect and enhance Cestyll Garden as a whole and to enhance public access in the long term.</li><li>• Identification and implementation of measures to safeguard and/or mitigate against potential adverse effects on Cestyll Garden that could arise, e.g. from dust, vibration, changes to water quality, light pollution, etc.</li></ul>	<p>appropriate monitoring of soil pH and a visual inspection of the condition of plants during the bulk earthworks of the construction period.”</p> <p>As identified in Section 11.6 of chapter D11 (cultural heritage) (APP-130) the following recording was identified to mitigate the effects on Cestyll Garden:</p> <ul style="list-style-type: none"><li>• Level 2 Historic landscape survey.</li><li>• Archaeological earthwork survey of any surviving remains of Cestyll House, Former Site of (Asset 132).</li><li>• Level 2 historic building recording of surviving structures.</li><li>• A photographic survey to provide a permanent visual record of the garden in its current form and condition and Significant Views and provide a detailed visual record of the garden, providing a comprehensive record of its existing form, appearance, setting and key views. This would include the former site of Cestyll House.</li></ul> <p>As identified in Section 11.6 of chapter D11 (cultural heritage) (APP-130) the following measure was identified to mitigate effects on the kitchen garden “<i>Agree with the National Trust, Cadw and GAPS the design of appropriate landscape measures to restore and/or enhance the former location of kitchen garden.</i>”</p> <p>As identified in paragraphs 11.4.9 of chapter D11 (cultural heritage) (APP-130), the good practice mitigation set out in chapters D5 (air quality) (APP-124), D6 (noise and vibration) (APP-125), D8 (surface water and groundwater) (APP-127) and D10 (landscape and visual) (APP-129) would also help to mitigate potential effects on heritage assets including Cestyll Garden.</p>	
		Felin Cafnan Mill (Grade II* Listed Building) - Adequacy of Mitigation and lack of compensation	IACC 0298	ES Volume D Chapter D11 (APP-130)	Although mitigation against physical damage arising from vibration is presented in outline, further detail of this mitigation proposal is required before it can be considered robustly by the IACC. It is noted that safe working practices would be identified to avoid any lasting damage but no detail is provided to allow an assessment of the likely effectiveness of any mitigation proposals and for the degree of damage to	<p>Further details of Horizon’s noise and vibration strategy are set out in Wylfa Newydd Code of Construction Practice [Deadline 5 version].</p> <p>The Landscape and Habitat Management Strategy (APP-424 and APP-425) sets out design and management principles for the landscae and habitats within the Wylfa Newydd Development Area (and the Ecological Compensation Sites). These principles will inform the production of detailed landscape and habitat implementation and management schemes, which will be prepared in consultation with key stakeholders.</p>	Ongoing

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					<p>this heritage asset, which is of ‘the highest significance’ in NPS terms, to be ascertained.</p> <p>Further detail is required of the mitigation that is proposed to protect the Corn Mill against physical damage arising from vibration and how this will be secured.</p> <p>IACC are prepared to agree in principle that vibration monitoring would be appropriate where the structure of the Corn Mill has been surveyed and any recommended remedial works carried out. However, IACC reserve comment on agreement of detailed measures until proposals have been set out in sufficient detail to be reassured that the potential for inadvertent harm has been minimised.</p> <p>Further detail of how the landscape will be restored at the end of the Construction phase is required.</p> <p>Further offsetting measures are required to compensate for long term visual impacts as a result of the effects of permanent structures including the MOLF. This would include undertaking structural and stabilisation works to the mill.</p>	<p>The Draft DCO includes draft Requirements which will secure delivery of these detailed schemes and the need for them to be approved by IACC</p> <p>The primary measures to mitigate the effects on the setting of Felin Gafnan Corn Mill are the embedded mitigation measures identified in 11.4.12 of chapter D11 (cultural heritage) (APP-130) and additional mitigation measures are identified in section 11.6 of the same chapter. Nevertheless Horizon will undertake English Heritage Level 4 Historic building recording of</p> <ul style="list-style-type: none"><li>• Grade II* Listed Felin Gafnan Corn Mill (Porth y Felin) (Asset 137);</li><li>• Grade II Listed Corn-drying house at Felin Gafnan (Asset 141); and</li></ul> <p>Grade II Listed Mill house at Felin Gafnan, Cylch-y-Garn.</p> <p>In addition, pending the identification of an appropriate location, Horizon are content to fund the IACC to explore the provision of enhanced interpretation in the form of an additional interpretation board at Felin Gafnan with the landowner.</p> <p>As identified in Horizon’s response to Written Representation [REP3-034] and secured in the draft s.106 agreement, where Horizon are responsible, they are content to make good damage to the following historic buildings:</p> <ul style="list-style-type: none"><li>• Grade II* Listed Felin Gafnan Corn Mill (Porth y Felin) (Asset 137);</li><li>• Grade II Listed Corn-drying house at Felin Gafnan (Asset 141); and</li><li>• Grade II Listed Mill house at Felin Gafnan, Cylch-y-Garn.</li></ul>	
		Archaeological remains - agreed scheme of archaeological investigation and recording	IACC 0299	ES Volume D Chapter D11 (APP-130)	It is agreed that a scheme of archaeological investigation and recording will be produced. This will include a post excavation assessment, reporting, publication and archiving. This will be submitted to and approved by IACC, in consultation with Cadw/GAPS. IACC reserves its position with regard to the effectiveness of this measure until such time as Horizon supplies detailed proposals for the reporting and dissemination of the results of the archaeology works that have taken place or may take place.		Agreed
		Enhanced Interpretation	IACC 0300	Draft s.106 Agreement (REP3-042)	Further information and commitments made for the provision of enhanced interpretation. There has been no direct engagement from HNP following the request for enhanced interpretation proposals. IACC have commented on proposals for interpretation as set out in the draft s106 agreement and reference must be made to recommendations arising from those discussions.	Proposed enhancement measures are included in the draft s.106 agreement.	Ongoing
Cultural Heritage – Off-Site Power Station Facilities							
Cultural Heritage	Assessment	Assessment of effects	IACC 0301	Chapter E11 (Cultural heritage) (APP-249), appendix E11-1 (APP-263)	The IACC and Horizon agree with the assessment of effects presented in Chapter E11 (Cultural heritage) (APP-249) and appendix E11-1 (APP-263)		Agreed

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	Mitigation	Mitigation - approach	IACC 0302	Chapter E11 (Cultural heritage) (APP-249), appendix E11-1 (APP-263)	The IACC and Horizon agree that the approach to mitigation identified in chapter E11 (Cultural heritage) (APP-249) is appropriate. Archaeological mitigation would be undertaken in accordance with and Written Schemes of Investigation which would be agreed with Gwynedd Archaeological Planning Service in their role as archaeological advisors to the IACC.			Agreed
		Mitigation - securing mechanism	IACC 0303	Chapter E11 (Cultural heritage) (APP-249), appendix E11-1 (APP-263), Wylfa Newydd CoCP Off-Site Power Station Facilities sub-CoCP (APP-417)	IACC needs to see the updated CoCPs referred to by Horizon.	As noted in para 11.6.7 of chapter E11 these measures would be secured through inclusion in section 12 of the Wylfa Newydd CoCP and section 12 of the Off-Site Power Station Facilities sub-CoCP (APP-417), both being secured through Development Consent Order requirements.		Ongoing
Cultural Heritage – Dalar Hir								
Cultural Heritage	Assessment	Assessment of effects	IACC 0304	Chapter F11 (cultural heritage) (APP-276), appendix E11-5 (APP-301)	The IACC and Horizon agree with the assessment of effects presented in chapter F11 (cultural heritage) (APP-276) and appendix E11-5 (APP-301) is appropriate			Agreed
		Mitigation - approach	IACC 0305	Chapter F11 (cultural heritage) (APP-276), appendix E11-5 (APP-301)	The IACC and Horizon agree that the approach to mitigation identified in chapter E11 (Cultural heritage) (APP-276) is appropriate. Archaeological mitigation would be undertaken in accordance with and Written Schemes of Investigation which would be agreed with Gwynedd Archaeological Planning Service in their role as archaeological advisors to the IACC.			Agreed
		Mitigation - securing mechanism	IACC 0306	Chapter F11 (cultural heritage) (APP-276), appendix E11-5 (APP-301)	Mitigation of disturbance of archaeological remains could, in this case, be adequately achieved by the implementation of an agreed scheme of archaeological investigation which should be the subject of a DCO requirement. IACC awaits further detail from Horizon.	As noted in paragraph 11.6.9 of chapter F11 (cultural heritage) these measures would be secured through inclusion in chapter 12 of the Wylfa Newydd CoCP and chapter 12 of the Park and Ride sub-CoCP (APP-418), both being secured through Development Consent Order requirements		Ongoing
	Mitigation	Mitigation – lighting	IACC 0307	Chapter F11 (cultural heritage) (APP-276), appendix E11-5 (APP-301), Wylfa Newydd CoCP, Park and Ride sub-CoCP (APP-418)	There is no consideration of the effects of lighting on setting or historic landscape character. While the lighting to the proposed park and ride facility would be seen in the context of the A55/A5 junction and would not contribute to any significant adverse effect, measures should be taken to mitigate any sense of intrusion that may arise from the increased visibility of lighting in this area.	As set out in the Design and Access Statement (APP-409 and APP-410) the proposed External Lighting Scheme would be carefully planned to minimise light spill onto adjacent and environmentally sensitive areas, watercourses, hedgerows and other habitats (Para 4.5.6).		Ongoing
Cultural Heritage – A5205								
Cultural Heritage	Assessment	Assessment of effects for archaeological remains	IACC 0308	G11 (Cultural heritage) (APP-314), appendix G11-5 (APP-351).	The IACC and Horizon agree with the assessment of effects on archaeological remains			Agreed



Topic	Sub topic	Issue	SoCG ID	Document Reference/Signpost/ Routemap	IACC Position	Horizon Position	RAG
		Assessment of effects for historic buildings	IACC 0309		The IACC and Horizon agree with the assessment of effects on historic buildings		Agreed
	Mitigation	Mitigation for archaeological remains – approach	IACC 0310	G11 (Cultural heritage) (APP-314), appendix G11-5 (APP-351).	The IACC and Horizon agree that the approach to the archaeological mitigation identified in chapter G11 (Cultural heritage) (APP-314) is appropriate. IACC needs to understand how this is secured in the DCO.	Archaeological mitigation would be undertaken in accordance with and Written Schemes of Investigation which would be agreed with Gwynedd Archaeological Planning Service in their role as archaeological advisors to the IACC.	Ongoing
		Mitigation for archaeological remains – securing mechanism	IACC 0311	Chapter G11 (cultural heritage) (APP-314), appendix G11-5 (APP-351)  Wylfa Newydd CoCP A5025 Off-line Highway Improvements sub-CoCP (APP-420)	Mitigation of disturbance of archaeological remains could be adequately achieved by the implementation of an agreed scheme of archaeological investigation. IACC would prefer that this is the subject of a specific requirement but accepts that the need to provide a WSI and agree it in advance with IACC is set out within the relevant CoCP.	Specific mitigation is identified in section 11.6 of chapter G11 (cultural heritage) (APP-314) and in appendix G11-5 (APP-351).  As identified in paragraph 11.6.8 of chapter G11, These measures would be secured through inclusion in section 12 of the Wylfa Newydd CoCP and chapter 12 of the A5025 Off-line Highway Improvements sub-CoCP (APP-420), both being secured through Development Consent Order requirements.	Agreed
		Mitigation for archaeological remains – Capel Soar Standing Stone (Scheduled Monument)	IACC 0312	Chapter G11 (Cultural heritage) (APP-314), appendix G11-5 (APP-351).	Given the nature of the proposals and their location the IACC recognises that it is unlikely that harm caused to change in the setting of Capel Soar standing stone can be meaningfully mitigated. The standing stone is however easily visible from the current A5025 and Horizon should identify potential compensation measures which could include an information board or similar at an appropriate location.	Pending the identification of an appropriate location, Horizon are content to explore the provision of enhanced interpretation in the form of an additional interpretation board at Capel Soar.	Agreed
		Mitigation for effects on historic building in Llanfaethlu and Llanfachraeth.	IACC 0313	Chapter G11 (cultural heritage) (APP-314), appendix G11-5 (APP-351)  Wylfa Newydd CoCP A5025 Off-line Highway Improvements sub-CoCP (APP-420)	The sub-CoCP should also be updated to reference measures to restrict construction traffic through the villages of Llanfaethlu and Llanfachraeth.  NOTE: this agreement applies only to historic environment issues and is without prejudice to noise and amenity considerations	Embedded mitigation and good practice mitigation measures identified in paragraphs 6.4.8, 6.4.9 and 6.4.10, 6.4.12, 6.4.13, 6.4.14 of chapter G6 (noise and Vibration) (APP-309) and in the of the Wylfa Newydd CoCP the A5025 Off-line Highway Improvements sub-CoCP (APP-420) are appropriate to mitigate effects Llanfaethlu and Llanfachraeth.	Agreed
Cultural Heritage – Logistics Centre							
Cultural Heritage	Assessment	Assessment of effects - Ty-Mawr standing stone and Trefignath burial chamber	IACC 0314	Chapter H11 (cultural heritage) (APP-365), appendix H11-2 (APP-380)	The influence of increased vehicle movements and associated lighting on the visibility and perceptual experience of the winter solstice sunrise from Ty-Mawr should have been considered in the assessment and whilst mitigation may present a minor reduction in effect, there does not appear to be any way in which the effects on lighting upon inter-visibility could be mitigated.  IACC is however prepared to agree an assessment of less than substantial harm that can be mitigated to a degree through lighting design, but reserve	As identified in paragraphs 1.2.1 and 1.2.2 of the ES Volume H - Logistics Centre H1 - Proposed development (APP-355) the proposed Logistics Centre site is within the Parc Cybi employment area, an area of existing and planned industrial and retail development which is a strategic employment 56ha development for north-west Wales, facilitated by the Welsh Government.  As identified in paragraph 1.6.1 of ES Volume H - Logistics Centre H1 - Proposed development (APP-355) the maintenance of the view between the Ty Mawr Standing Stone and the Trefignath Burial Chamber across the southern corner of the site was embedded into the design of the proposed Logistics Centre, along with the need for the lighting design that	Ongoing



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					<p>comment on the effectiveness of specific mitigation measures until further detail is provided by HNP.</p>	<p>mitigates light spill and to employ a control system which illuminates only those areas where activities are occurring.</p> <p>In addition, and as stated in paragraph 2.3.5 of ES Volume H - Logistics Centre H2 - Alternatives and design evolution (APP-356) the main environmental factor determining the proposed final layout of the Logistics Centre (as described in chapter H1 (APP-355) has been the requirement to maintain, as far as possible, the line of sight between the aforementioned Scheduled Monuments. In addition, the southern part of the Logistics Centre site has been assessed to be of high archaeological potential. The consideration of these factors resulted in the office/welfare building, covered inspection bay and HGV parking areas being located as far as possible outside these areas of interest.</p> <p>The value of these heritage assets, and the importance of the intervisibility between them, was therefore considered during the design process.</p> <p>The importance of the indivisibility between Ty Mawr Standing Stone (Aset 22) and the Trefignath Burial Chamber (Asset 21) is reiterated in paragraphs 11.3.5 and 11.3.6 of the ES Volume H - Logistics Centre H11 - Cultural heritage (APP-365) and that the layout of the Logistics centre was designed to reduce visual intrusion into the settings of Ty Mawr Standing Stone (Asset 22) and the Trefignath Burial Chamber (Asset 21) Scheduled Monuments and maintain the line of sight between the two heritage assets and the possible visual alignment of these monuments and the winter solstice sunrise, as far as reasonably practicable within security and operational requirements, was identified as embedded mitigation and is identified in paragraph 11.4.8.</p> <p>As presented in Appendix H11-2 (APP-381) potential effects on Ty Mawr Standing Stone (Asset 22) and the Trefignath Burial Chamber (Asset 21) during consultation were identified resulting from the introduction of additional vehicle noise and movement into the setting of these assets. Before mitigation the significance of this effect was assessed to be minor adverse. After mitigation in the form of a photographic survey to make a record of current setting, the significance of residual effect was assessed to be minor adverse.</p> <p>As presented in Appendix H11-2 (APP-381) while during operation the Logistics Centre would be present in the setting of the burial chamber (see appendix H10-5 (photomontage views) (APP-379)) and additional vehicle movement would be introduced into the asset's setting, the intervisibility between the burial chamber (Asset 21) and the standing stone (Asset 22) would be maintained and vehicle noise and movement and street lighting already form part of the setting. Based on this before mitigation the significance of this effect was assessed to be minor adverse. No mitigation was proposed and the significance of residual effect was therefore assessed to be minor adverse.</p> <p>External lighting proposals are provided in section 4.5 of the of volume 3 of the Design and Access Statement, appendix 1-4 (Logistics Centre) (APP-</p>	

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						<p>410) and proposed lighting plan is shown of figure 34. As identified in paragraph 4.5.6 of the Design and Access Statement:</p> <p>The design would work under the 'broad consideration' that the Isle of Anglesey is working towards a Dark Sky Reserve Status. As such:</p> <ul style="list-style-type: none"><li>• consideration would be given to the presence of existing road lighting;</li><li>• lighting design would be carefully planned to minimise light spill onto adjacent</li><li>• and environmentally sensitive areas, watercourses, hedgerows and other habitats; and the lighting would be zoned and dimmed to support the day-to-day operations of the facility</li></ul> <p>As such is not considered that lighting would result in a significant effect to the setting the burial chamber (Asset 21) and the standing stone (Asset 22).Horizon will pay a contribution to the IACC to improve, supplement or replace the existing interpretation boards at the Capel Soar Standing Stone, Trefignath Burial Chamber, and Ty Mawr Standing Stone (secured in the draft s.106 agreement)</p>	
	Mitigation	Mitigation – approach	IACC 0315	Chapter H11 (cultural heritage) (APP-365), appendix H11-2 (APP-380)	IACC is in agreement with Horizon's position although it would reserve comment on the effectiveness of specific mitigation until further detail is provided.	<p>Chapter H11 does not state that archaeological remains have been previously identified and recorded. Paragraph 11.3.3 states that “Apart from two small areas, the Logistic Centre site has been subject to strip map and sample which mitigated the effects of the Parc Cybi employment area on any archaeological remains that were present. Given the intensity of investigation no additional evaluation was therefore required to inform the baseline of the Logistic Centre. In addition, one of the two areas was the site of 19th century farm buildings (Asset 6) which are likely to have removed or truncated any archaeological remains that may have been present. While the second area is under mature scrub, it has been assessed to have a high potential for the presence of unknown archaeological remains, and is shown on figure H11-1 (APP-365). “ while paragraph 11.3.22 states that “The majority of the Logistics Centre site has been subject to archaeological investigations undertaken for the Parc Cybi employment area. Based on the results of these archaeological investigations, the potential for the presence of unknown archaeological remains within undisturbed areas within the Logistics Centre site has been assessed to be high (see figure H11-1, APP-365). “</p> <p>As identified in para 11.6.3 “There is the potential that any unknown archaeological remains that may be present within previously undisturbed areas of the Logistics Centre would be removed by construction (figure H11-1, APP-365). Effects on any such archaeological remains that may be present would be mitigated through the development of an archaeological mitigation strategy which would be developed in consultation with relevant stakeholders, to undertake a series of mitigation works which could potentially include targeted archaeological watching brief, targeted excavation and targeted strip map and sampling”.</p> <p>It is agreed that a photographic survey would not mitigate the effects on the setting of Ty Mawr Standing Stone (Aset 22) and the Trefignath Burial Chamber (Asset 21) and this is reflected in the potential significance of</p>	Ongoing

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						<p>effect and the significance of residual effects during the construction being predicted to be the same.</p> <p>As noted above, whilst there will be an effect on the setting the burial chamber (Asset 21) and the standing stone (Asset 22), as the intervisibility would be retained this was not assessed to be significant. Horizon therefore do not consider that re-assessment is required.</p> <p>Horizon will pay a contribution to the IACC to improve, supplement or replace the existing interpretation boards at the Capel Soar Standing Stone, Trefignath Burial Chamber, and Ty Mawr Standing Stone (secured in the draft s.106 agreement)</p>	
Cumulative impacts							
Intra-development cumulative effects (combined effects of various predicted topic impacts on a single resource or receptor)	Method of Assessment	Approach and method of assessment	IACC 0316	Volume I of Environmental Statement (APP-384 to APP-397)	IACC to complete.  Methodology presented in chapter I3 of the ES. Discussed and agreed with the IACC and other stakeholder previously.		Agreed
	Baseline	All resources and receptors that could be subjected to combined effects	IACC 0317	Volume I of Environmental Statement (APP-384 to APP-397)	The baseline provided in the ES is accurate and sufficient.		Agreed
	Assessment	Reasonably Forseeable Future Projects	IACC 0318	Volume I of Environmental Statement (APP-384 to APP-397)	<p>IACC in broad agreement with the list of Reasonably Foreseeable Future Projects in the Environmental Statement, but have requested further consideration of AN17 relating to potential construction of 300 council houses. The locations where this housing provision would be brought forward are known with sufficient certainty and the consideration of cumulative impacts does not need to focus upon localised site specific issues such as construction noise and dust but rather the potential interaction with the WNP in terms of accommodation demand and supply. The IACC LIR also highlighted the need to consider the Third Menai Crossing and IACC remains of the opinion that this project should be included with the scope of the CIA.</p>	<p>AN17 has been considered in the cumulative assessment and, in accordance with the methodology, has been scoped out on the basis that there is no environmental information on which to base an assessment. In line with industry good practice in the area of cumulative assessment, Horizon are not able to speculate on the potential environmental effects of AN17 given the lack of information available on the development.</p> <p>If and when AN17 comes forward as a project seeking planning permission it will be for that project to fully consider the effects in conjunction with other projects, including Wylfa Newydd. At that time, Horizon will work with the developer to ensure the cumulative assessment prepared is robust.</p> <p>The same rationale applies to the Third Menai Crossing, where the potential for the project to come forward is recognised, but there is not sufficient information available on which to base a cumulative assessment. It would be inappropriate for Horizon to speculate on the location, timing or way in which a Third Menai Crossing project would be delivered.</p>	Not agreed

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	Analysis of Proposed Development	Analysis of Proposed Development	IACC 0319	Volume I of Environmental Statement (APP-384 to APP-397)	IACC agrees that the ES presents a sufficient analysis of the proposed development with respect to the identification of project activities and physical elements (in both spatial and temporal terms) that could give rise to intra project effects. Furthermore, the groups of receptors which might experience such effects have been identified.		Agreed
	Assessment	Accuracy of the Assessment	IACC 0320	Volume I of Environmental Statement (APP-384 to APP-397)	IACC agrees that the overall assessment methodology that has been adopted by Horizon is appropriate. As indicated in the LIR, IACC requires that a full inventory and clear spatial representation of all individual receptors that will be subject to significant effects in the locality of the WNDA is provided.		Agreed
	Mitigation	Sufficiency of mitigation	IACC 0321	Volume I of Environmental Statement (APP-384 to APP-397)  Draft DCO s.106 Agreement (REP3-042)	IACC maintains that cumulative effects upon communities and more widely dispersed residents in proximity to the WNDA will be significant even with the delivery of the mitigation that Horizon currently proposes. The key sources of such effects include noise, visual amenity, traffic and use of local socio-economic resources. IACC maintains that cumulative effects upon the most vulnerable communities and residents in the locality of the WNDA cannot be defined with a very high level of precision. Therefore, the potential for unexpected effects to occur remains. As a result, the availability of flexible and appropriately resourced mitigation is required and IACC notes and welcomes the Community Funding proposals put forward by Horizon as the basis for further dialogue and consensus on this topic.	Mitigation arising from the cumulative assessment is presented in chapters I4 and I5 of the ES (APP-387 and APP-388) and in the Mitigation Route Map (submitted at Deadline 6).  Recognising the potential for unexpected effects to occur, Horizon has prepared the draft s.106 agreement which will continue to be developed through examination [REP3-042].	Ongoing
	Monitoring	To monitor the combined effects of the development on resources and receptors and to put in place measures to remedy any combined effects that are not in accordance with the ES findings/DCO requirements	IACC 0322	Volume I of Environmental Statement (APP-384 to APP-397)	Further to the observations provided under the Mitigation topic above, robust monitoring must be in place to ensure that mitigation can be targeted to those receptors which are most affected. Given that mitigation needs with respect to cumulative effects are subject to a degree of uncertainty, monitoring findings should be subject to review on a quarterly basis so that revisions to mitigation can be applied as necessary and in a timely manner.	Proposed monitoring is included throughout the assessment chapters in the ES. The monitoring proposed is considered to be sufficient to deal with any uncertainty associated with the assessment of cumulative effects.	Ongoing
	Appendices	All necessary supporting information (not already provided elsewhere in the documents)	IACC 0323	Volume I of Environmental Statement (APP-384 to APP-397)	As stated in the LIR, IACC maintains that a greater level of precision should be provided with respect to the spatial identification of specific receptors both within community boundaries and at dispersed properties in the locality of the WNDA that are anticipated to experience significant cumulative effects.	Horizon has provided the necessary supporting information and the level of detail is sufficient.	Ongoing

Topic	Sub topic	Issue	SoCG ID	Document Reference/Signpost/ Routemap	IACC Position		Horizon Position	RAG	Action required to inform further discussion on the issue
EDUCATION, SKILLS AND LABOUR									
Education, Skills and Labour	Baseline and Data Collection	Availability of workers	0324	Chapter C3 of the Environmental Statement (APP-090)	Horizon has assessed the potential for 9,000 workers, as a worst case scenario, with the expected numbers to be 8,500.			Agreed	No further action
	Modelling and Assumptions	Modelling and Assumptions	0325	Chapter C1 of the Environmental Statement (APP-088)	The IACC is still unclear how many workers will bring their families and how many school aged children will be attending local schools.	Horizon's position in the ES is that across the KSA as a whole, there are approximately 1,657 available primary school places in 87 primary schools. At peak, it is estimated that workers would bring 285 partners and 220 dependants (at peak). These dependants would add to the primary and secondary school population and under a worst case scenario it has been assumed that all would be of primary school age. This is unlikely to be the case.  While it is recognised that the baseline in terms of spare school places will reduce in the coming years, the fact that it is highly unlikely that all dependants would be of primary school age, and that there is still expected to be an excess of places overall, means no significant effect is identified.  Horizon responded to the Council on this point by email dated 5th October 2018. It is considered that the DCO is accurate in terms of its calculations of likely dependents. Further detail is also provided in Horizon's response to the Local Impact Report [REP3-004].	Ongoing	IACC to confirm position following Horizon note	
		Attracting Ex-Magnox Workers and Attracting back ex-Local People	0326	Jobs and Skills Strategy (APP-411)	Campaign to attract and recruit ex-Magnox workers and a marketing campaign & tracker system to attract skilled people back to Anglesey.	Horizon would be the principal employer for the operational staff, it is anticipated that the workforce would be recruited from:  <ul style="list-style-type: none"><li>Qualified Apprentices and Trainees from other schemes;</li><li>Qualified Graduates;</li><li>Related industries and organisations, including Ex Armed Forces;</li><li>The existing UK nuclear workforce (Horizon has established links with Magnox to discuss the potential transition of staff from north Wales sites to the operational workforce); and</li><li>Members of Horizon’s existing staff wishing to transfer to the operational workforce.</li></ul> The remit of the Wylfa Newydd Employment and Skills Service (WNESS) is to focus on:  <ul style="list-style-type: none"><li>Providing employment opportunities for residents of Anglesey and North Wales;</li></ul>	Ongoing	Horizon’s view is that IACC’s outstanding concerns are addressed by the draft S.106 agreement, but this has not been confirmed by IACC	



Topic	Sub topic	Issue	SoCG ID	Document Reference/Signpost/Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
						<ul style="list-style-type: none"><li>Helping to tackle unemployment through the pre training of suitable and assessed candidates in occupations that are in demand by Horizon's contractors;</li><li>Working with contractors to provide apprentice opportunities for people;</li><li>Widening employment and skills opportunities for those typically underrepresented groups in the construction and engineering sectors; and</li><li>Maximising leverage and support from Welsh Government funding agencies, sector skills councils, trusts, support organisations and businesses to ensure opportunity is available to a broad range of local people and not only those who are in long term unemployment.</li></ul>		
		Local Jobs	0327	Jobs and Skills Strategy (APP-411)  Draft DCO S106 agreement	Opportunities from higher level managerial and professional through to support functions need to be identified. The job type and the skills required to perform that role needs to be clarified and the number of local people performing these roles needs to be quantified. HNP must fully resource support to local people and businesses to understand and access jobs and supply chain opportunities during construction, operational and decommissioning such as will these be open for local workers or filled by supply chasing contracts. This detail is required as the regular influx of 1,000 temporary workers will create significant impacts on their own, while temporary jobs for locals creates different impacts, particularly in the labour market	<p>The Jobs and Skills Strategy identifies the Skills priorities for this project, including a total trade breakdown and the construction workforce profile.</p> <p>Horizon is working with Welsh Government, the Department for Work and Pensions and other stakeholders to develop a Wylfa Newydd Employment and Skills Service (WNESS). Its role will be to place people into sustainable employment created by the building of the Wylfa Newydd Power Station and the construction of its Associated Developments.</p> <p>Horizon will also consider extending the model in the future to include the employment of operational staff, subject to monitoring and evaluation of the effectiveness of the WNESS.</p> <p>One of the remits of the WNESS is to provide employment opportunities for residents of Anglesey and North Wales.</p> <p>There is also a Supply Chain Action Plan to be developed by the parties, secured by the S106. This will support Horizons drive to maximise opportunities within the local area. The draft s106 agreement also includes apprenticeship target commitments. Horizon is proposing a programme of three-year technical apprenticeships which offers participants the opportunity to train in the core technical and practical engineering skills needed to build, operate and maintain the Wylfa Newydd Project while gaining relevant qualifications and accreditations in line with National Standards.</p>	Ongoing	Horizon's view is that IACC's outstanding concerns are addressed by the draft S.106 agreement, but this has not been confirmed by IACC

Topic	Sub topic	Issue	SoCG ID	Document Reference/Signpost/Routemap	IACC Position	Horizon Position	RAG	Action required to inform further discussion on the issue
		Outage Period Jobs	0328	Jobs and Skills Strategy (APP-411)	The 1,000 workers required to carry out routine maintenance during outage periods once the plant is operational has not been consulted upon previously and further information is needed on these roles.	<p>The Jobs and Skills states at paragraph 2.5.2: “The specialist nature of some outage activities usually requires additional skills to be deployed as a complement to those already held by the operational workforce or regional supply chain. Outage staffing would therefore tend to draw on a combination of regional, UK and international workforces.”</p> <p>The Stage Two consultation document also stated that up to 1,000 additional temporary jobs would be created during periodic outages for maintenance, presenting opportunities to draw on the experienced regional skills base in nuclear power generation and servicing.</p> <p>This is a matter that could be subject to further discussion through the development of the Jobs and Skills Implementation Plan, which is secured through the s.106 agreement.</p>	Ongoing	IACC to confirm position

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		Construction Jobs	0329	Volume C Chapter C3 of the Environmental Statement (APP-090)	IACC wishes to see local employment above the previous 2,700 (25%) level not decreasing to 2,000 (22%). No evidence has been provided to justify why this already low figure has decreased. A higher figure is entirely achievable with a greater commitment towards training and equipping local people to be part of the labour pool. Had the percentage of local jobs in the project remained fixed at PAC2 levels, the local share of the new workforce jobs profile would have been closer to 30% which in itself is closer to the target set for Hinkley Point C (34%).	The 2,000 home-based worker number is an assessment estimate based on a % of the workers on the project and the types of skills required. It is not a target. It was reduced from 2,700 because the number of roles which are likely to be home-based has been reduced as a result of changes in the construction, which, from PAC3, saw the size of the overall workforce on the project reduce.	Ongoing	IACC to confirm position
		Maximum / Peak Scenario	0330	Volume C Chapter C3 of the Environmental Statement (APP-090)  Socio-economic technical appendix (APP-096)	Clarification is needed of maximum/peak scenario and main risks/changes that could impact on the job numbers.	The Environmental Statement considers a likely scenario, based on a series of assumptions which are set out in the socio-economic technical appendix (APP-096). It is not considered necessary to model different scenarios based on the extensive range of mitigation secured through the s.106 agreement, which Horizon considers is appropriate to deliver the home-based worker numbers assessed.	Ongoing	IACC to confirm position
		Operational Employees	0331	Volume C Chapter C3 of the Environmental Statement (APP-090)  Draft DCO S106 agreement	The IACC wish to work with Horizon to increase the level of local employment on the operational power station to as many as possible. In PAC3 Horizon stated that they would expect "up to 85%" of the operational jobs to be taken by local residents. IACC would like this to be a minimum level with a target of 100%.  Training during the operating phase should continue to be available through the medium of Welsh and English and in accessible locations. It should also continue to be targeted towards those who are NEET, economically inactive, or have other barriers to employment, or those who are retired but could work part time. Funding should also be available directly to individuals where this may increase uptake, for example scholarships, bursaries, grants or funding for travel costs or clothing.	Horizon has assumed that 85% of operational workforce as being local based on what was achieved at the existing Wylfa Power Station. Horizon is happy to work with the IACC to increase this where possible.  In terms of training, as the operational language of the power station at Wylfa Newydd is English, all training delivered to staff and contractors for the site will be delivered in English. This reflects current arrangements. Current apprentice courses are delivered in English.  Horizon is not proposing that the Jobs and Skills Contribution in the draft DCO s.106 would enable training throughout operation, but the JSIP will have an operational component.	Ongoing	Horizon's view is that IACC's outstanding concerns are addressed by the draft S.106 agreement, but this has not been confirmed by IACC
		Skills/occupati on profile of construction workforce	0332	Jobs and Skills Strategy (Examination Document Reference: APP-411)	IACC has sought further information on the expected age and skills profiles of workers	The latest information on the skills profile of the construction workforce has been shared with IACC. When this is updated, the new data will also be shared with IACC, through the Jobs and Skills Engagement Group.	Ongoing	Horizon's view is that IACC's outstanding concerns are addressed by the draft S.106

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								agreement , but this has not been confirmed by IACC
	Assessment	Local Operational Labour	0333	Volume C Chapter C3 of the Environmental Statement (APP-090)	Assessment of local operational labour is set at 45%, although with mitigation, this is expected to reach 85%. IACC consider that the evidence base should reflect this level of ambition and this level should be included as a commitment with appropriate delivery mechanisms.	Horizon has assumed that 85% of operational workforce as being local based on what was achieved at the existing Wylfa Power Station. Horizon is happy to work with the IACC to increase this where possible. This could be done through the Jobs and Skills Implementation Plan.	Ongoing	Horizon's view is that IACC's outstanding concerns are addressed by the draft S.106 agreement, but this has not been confirmed by IACC
		Impact on Primary Schools	0334	Mitigation Route Map (APP-422)	Horizon assesses the impact on primary schools to be insignificant, with no mitigation beyond the Community Impact Fund which would allocate funding if monitoring showed demand exceeded capacity on the basis that housing developers would include mitigation as a result of new developments. IACC advises that there is existing primary schools oversubscription across the Island the predicted increased demand on school places until 2025 requires implementation of proposals to mitigate against the project's related employment led increased demand on the Education Authority's resources.	<p>Horizon's position in the ES is that across the KSA as a whole, there are approximately 1,657 available primary school places in 87 primary schools<sup>14</sup>. At peak, it is estimated that workers would bring 285 partners and 220 dependants. These dependants would add to the primary school population and under a worst case scenario it is assumed that all would be of primary school age. This is unlikely to be the case.</p> <p>While it is recognised that the baseline in terms of spare school places will reduce in the coming years, the fact that it is highly unlikely that all dependants would be of primary school age, and that there is still expected to be an excess of places overall, means no significant effect is identified.</p> <p>Specific funding is provided in the draft DCO s.106 agreement for an Education Contribution and contingency fund and this will include any additional costs incurred as a result of delaying in funding reaching IACC for dependants.</p>	Ongoing	Horizon's view is that IACC's outstanding concerns are addressed by the draft S.106 agreement, but this has not been confirmed by IACC
		Need for teachers	0335	Volume C Chapter C1 of the Environmental Statement (APP-088)  Mitigation Route Map (APP-422)	Horizon's estimate of dependants at peak would require 12 additional qualified teachers. Training costs for 12 staff is approximately £240k (assuming no staff turnover) and salary costs approximately £425k pa at present rates.	<p>Horizon does not accept that there is no existing capacity, although it accepts that there is a risk in relation to primary school provision and so has proposed an Education Contribution and Contingency Fund to address this in the draft DCO s.106.</p> <p>It is not however accepted that Horizon would need to contribute towards the full cost of educating the children coming to the area as a result of the Wylfa Newydd Project on the basis that Council tax contributions would be realised once workers become resident on the island. It does however accept that there is a lag between children arriving and Council tax feeding into the system, which</p>	Ongoing	Horizon's view is that IACC's outstanding concerns are addressed by the draft S.106 agreement, but this has not been confirmed by IACC

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						<p>would be addressed through the Education contributions.</p> <p>The part of the fund payable on implementation could also allow IACC to carry out up front planning in advance of children arriving.</p>		
		Impact on Secondary Schools	0336	Volume C Chapter C1 of the Environmental Statement (APP-088)	The assessment of impact on secondary schools is agreed.		Agreed	No further action
		Supply of Skills	0337	Jobs and Skills Strategy (APP-411)	Downward revision of workforce numbers from PAC2 to PAC3 in "site services, security, and clerical staff" and "Civil Engineering operatives" gives guidance on changing demand but is incomplete and IACC requires more detail on the demand and supply for skills and qualifications.	Horizon's submitted position on Jobs and Skills Strategy is within the Jobs and Skills Strategy.	Ongoing	Horizon's view is that IACC's outstanding concerns are addressed by the draft S.106 agreement, but this has not been confirmed by IACC
		Labour Shortages	0338	Jobs and Skills Strategy (APP-411)  Draft DCO S106 agreement	The IACC remains concerned that the level of additional demand from Wylfa Newydd is likely to cause labour shortages and displacement in existing sectors and businesses, including in the tourism sector. This presents an opportunity to ensure that there is an adequate supply of labour for the demand created by Wylfa Newydd. This would also help mitigate displacement impacts and provide a sustainable legacy from the project to support key sectors of the economy including tourism.	Horizon is proposing a flexible Jobs and Skills Contribution (secured in the draft DCO s.106) that can be applied to any occupation that will be needed on the Wylfa Newydd project, including site services and facilities management. Specific payments for workforce planning have been provided in the health sector which is understood to be particularly vulnerable. The fire and rescue contribution also has a workforce planning component	Ongoing	Horizon's view is that IACC's outstanding concerns are addressed by the draft S.106 agreement , but this has not been confirmed by IACC
		Impact on Primary Schools	0339	Volume C Chapter C1 of the Environmental Statement (APP-088)  Draft DCO S106 agreement	IACC are concerned that the impact on primary schools will not be fully understood until the Project is under construction. This is partly because the existing surplus capacity in primary schools is intended to be addressed by the current new schools programme. Further discussion is therefore required on the monitoring of primary schools provision and ensuring that mitigation addresses this appropriately.	<p>Horizon has committed to monitoring the effects of the Project through the WAMS, and developing appropriate mitigation.</p> <p>Within the S106 it states that School enrolment will be monitored by IACC and would be linked to the WAMS dataset where possible. Should localised issues arise where applications are made for places in schools at capacity, and IACC can demonstrate the nature of the resulting effect (e.g. temporary short-fall in funding, additional costs for appeals processes etc), Horizon will provide funding to address this via the Education Contribution and Contingency Fund.</p>	Ongoing	Horizon's view is that IACC's outstanding concerns are addressed by the draft S.106 agreement, but this has not been confirmed by IACC



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	Mitigation	Jobs and Skills Strategy	0340	Jobs and Skills Strategy (APP-411)	<p>The IACC welcome the development of the Jobs and Skills Strategy but key issues remain. In particular, there have been no obvious changes in projections from PAC3 and the construction and operational workforce numbers seem to be unchanged for total jobs, type of jobs and share likely to be filled by 'local' workforce. The IACC are also concerned that the Strategy mainly deals with the construction phase of the project and not the operational phase.</p> <p>Further information required on education and skill measures in the Jobs and Skills Strategy needs to be provided, for example, Horizon refers to an “education hub” and to “identifying educational touch points” but neither are explained further.</p>	<p>Horizon will to work with IACC and other partners, including Welsh Government, on the development of the Jobs and Skills Implementation Plan. The intention now is that the agreed Implementation Plan would be required prior to implementation.</p> <p>The intention is that the first iteration of the JSIP agreed will covers predominantly construction and operational skills. This can be developed also to include areas of skills that have the potential to be impacted by the Wylfa Newydd Project e.g. hospitality, care, security sectors and will be subject to further discussion through the Jobs and Skills Engagement Group.</p> <p>Horizon is committed to meeting, and hopes to exceed, the 22% home-based workforce which is used in the Environmental Statement for assessment purposes.</p> <p>Horizon is proposing that detailed measures in relation to skills and training are developed through the Jobs and Skills Engagement Group.</p> <p>Finally the draft s.106 agreement commits to the early delivery of a Visitor centre. This is a multi-million pound in kind cost to Horizon.</p> <p>Horizon's has also proposed that the Council develop with it an Education Strategy, as provided for in the revised draft s106 agreement</p>	Ongoing	Horizon's view is that IACC's outstanding concerns are addressed by the draft S.106 agreement, but this has not been confirmed by IACC
		Backfilling	0341	Jobs and Skills Strategy (APP-411)	IACC require additional information in relation to the training places to be provided by year, course and skill level. Further detail on how large the problem of backfilling and the frequency of this monitoring. Further detail should be provided in relation to the Service Hubs/Management Boards as these are considered to be the mechanism for monitoring. There is also a need to understand how the monitoring will trickle down to the supply chain.	Horizon has worked with Welsh Govt, CITB, the Regional Skills Partnership and training providers to assess the current levels of training capacity and whether they are sufficient. Backfilling of jobs can be done through the WNESS, supported by additional training from the flexible Jobs and Skills Contribution and Contingency Fund if required.	Ongoing	Horizon's view is that IACC's outstanding concerns are addressed by the draft S.106 agreement, but this has not been confirmed by IACC
		Timing of Capital Investment in Schools.	0342	Draft DCO S106 agreement	Funding for a capital investment programme for schools is required now. Horizon must review their programme for investment in education and training facilities to ensure local employment targets are met now.	Schedule 6 of the draft DCO s.106 which was issued to the Council on 23 <sup>rd</sup> January 2019 provides detail on a specific Education Contribution and Contingency Fund which can be utilised for capital investment.	Ongoing	Horizon's view is that IACC's outstanding concerns are addressed by the draft S.106 agreement, but this has not been confirmed by IACC

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		Education Fund (1)	0343	Mitigation Route Map (APP-422)	<p>Horizon estimate 31 additional pupils will need education, equating to training costs of approximately £20k per teacher and salary costs of approximately £70k pa at current rates. As above, a higher figure may be appropriate for contingency purposes, and measures to support teacher recruitment and retention as a whole are also needed.</p> <p>Action must be taken in good time, beginning not less than 3 years before the anticipated arrival of workers.</p>	<p>During the operational phase, Council tax would be available for any additional children arriving to the area as a result of the jobs created during the operation of the Wylfa Newydd Project. These will be permanent staff, based on the island for up to the lifetime of the Power Station and Horizon consider that there is sufficient time to allow for proper planning and funds to be released through Council tax, in the normal way, prior to the Power Station becoming operation.</p> <p>In any event, the Education contribution is available to be released for early planning. In addition there is a contingency fund which can be released where capacity issues at schools are forecast. The basis on which this fund could be released is set out in the draft DCO s.106 shared with IACC on 23<sup>rd</sup> January.</p> <p>Workers will start to arrive from the start of Year 1, but workforce does not start rising more significantly until the end of Year 3. The workforce is anticipated to reach about 5,000 by the end of Year 4 and then the peak is not reached until the end of Year 7.</p> <p>In recognition of the need for some early planning and in recognition that there will be some dependants associated with non-home based workers arriving in Year 2, Horizon is proposing to the proportion of the Education Contribution on implementation.</p> <p>Note that there is also a separate Jobs and Skills Contribution and Contingency Fund and the proposed Education Contribution is intended to deal only with training of and support for teachers, school resources and capacity, and monitoring the impact on local schools.</p>		Horizon's view is that IACC's outstanding concerns are addressed by the draft S.106 agreement, but this has not been confirmed by IACC
		Education Fund (2)	0344	Mitigation Route Map (APP-422) Draft s.106 agreement	<p>If employment for Anglesey residents is to be maximised, Horizon should contribute more comprehensively and clearly to investment in high quality post-16 education, training and work experience and to providing funding to encourage and support access to them.</p> <p>IACC believes that Horizon should commit to contributing to funding the WNESS during the operational phase at an appropriate level to support the on-going aim of maximising local employment.</p>	<p>A significant portion of the Jobs and Skills contribution is proposed to be paid directly to IACC for delivery of programmes to get under employed and un-employed.</p> <p>Horizon is not proposing to continue funding the WNESS throughout the operational phase. All jobs will be advertised appropriately to attract suitably qualified candidates. It is thought that Horizon's continued work with schools, colleges and universities plus its apprentice and graduate schemes will help to ensure a sufficient pipeline of suitably qualified individuals from the local area.</p>	Ongoing	Horizon's view is that IACC's outstanding concerns are addressed by the draft S.106 agreement , but this has not been confirmed by IACC

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		Skills Fund	0345	Draft DCO S106 agreement	Concern about the timing and detail of the Skills Fund.	Schedule 6 of the Draft DCO s.106 (shared with IACC on 23 January 2019) includes detail on the timing and quantum of the Jobs and Skills Contribution and Jobs and Skills Contingency Fund.	Ongoing	Horizon's view is that IACC's outstanding concerns are addressed by the draft S.106 agreement, but this has not been confirmed by IACC

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