

Wylfa Newydd Project

Statement of Common Ground between Horizon Nuclear Power Wylfa Limited and Conwy County Council

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Contents

1	Introduction	1
1.1	Status of SoCG	1
1.2	Purpose of this document	1
1.3	Description of development	2
	<i>The Wylfa Newydd Project</i>	2
	<i>The Enabling Works</i>	2
	<i>The Wylfa Newydd DCO Project</i>	2
2	Overview of Engagement	4
3	Project Vision and Objectives	5
3.1	Project Vision	5
3.2	Project Objectives	5
4	Current Position	7
	<i>Housing</i>	7
	<i>Tourism</i>	8
	<i>Economic Development</i>	9
	<i>Transport</i>	10

List of Tables

Table 2-1	SOCG meetings	4
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1 Introduction

1.1 Status of SoCG

- 1.1.1 This Statement of Common Ground (hereafter referred to as the 'SoCG') is being submitted to the Examining Authority as a jointly agreed statement between Horizon Nuclear Power (hereafter referred to as 'Horizon') and Conwy County Borough Council (hereafter referred to as 'Conwy'). It is an accurate reflection of agreed, disagreed and ongoing matters at Deadline 6.
- 1.1.2 It is noted that where this SoCG relies on documents which are due to be submitted at later deadlines in the examination, 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 in accordance with the guidance published by the Department of Communities and Local Government (hereafter referred to as 'DCLG Guidance')¹ and example SoCG documents provided on the Planning Inspectorate's website².
- 1.2.2 The purpose of the SoCG is to set out agreed factual information about the application for development consent made by Horizon for the construction and operation of a new nuclear power station at the Wylfa Newydd Development Area (hereafter referred to as 'WNDA') together with on and off-site associated development (hereafter referred to as 'the Wylfa Newydd DCO Project'). Where identified, the SoCG also details those areas where agreement has not been reached.
- 1.2.3 Paragraph 58 of the DCLG Guidance states:

"A statement of common ground is a written statement prepared jointly by the applicant and another party or parties, setting out any matters on which they agree. As well as identifying matters which are not in real dispute, it is also useful if a statement identifies those areas where agreement has not been reached. The statement should include references to show where those matters are dealt with in the written representations or other documentary evidence"
- 1.2.4 In addition to their role in the preparation of this SoCG, Conwy are also a member of the North Wales Economic Ambition Board (NWEAB) and are party to the SoCG between Horizon and NWEAB.
- 1.2.5 Conwy also form part of the Team Wales approach led by Anglesey County Council and Welsh Government.
- 1.2.6 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

¹ Planning Act 2008: Guidance for the examination of applications for development consent (March 2015) paragraphs 58 – 65

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/418015/examinations_guidance- final_for_publication.pdf

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

order granting development consent for the construction of the Wylfa Newydd DCO Project.

1.3 Description of development

The Wylfa Newydd Project

1.3.1 The Wylfa Newydd Project includes

The Enabling Works

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

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

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

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

The Wylfa Newydd DCO Project

1.3.6 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 at Wylfa, 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 works and activities including 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).

Associated Development

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

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

Licensable Marine Activities

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

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

2 Overview of Engagement

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

Table 2-1 SOCG meetings

Meeting Date	Attendees	Purpose of Meeting
23 rd August 2017		Initial meeting to discuss approach to SoCG
11 th January 2018	Horizon Conwy	Key issues workshop
6 th September 2018		Meeting to agree the final SoCG structure and headline content

2.1.2 Horizon has engaged proactively with Conwy to develop this draft SoCG. Details of this engagement are set out in Table 2-1. A meeting was also arranged to discuss the contents of this SoCG on 21st January 2019 but was cancelled by Conwy to await internal officer comment to the Draft s.106 agreement, the outcome of which is detailed in this SoCG.

2.1.3 Draft SoCGs were provided to Conwy on the 27th October 2017, 9th April 2018, and 24th October 2018. It is also noted that Conwy were engaging in the Team Wales approach and working alongside Welsh Government to collectively prepare necessary evidence and position statements. The results of which are included within the SoCG.

3 Project Vision and Objectives

3.1 Project Vision

3.1.1 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."

3.1.2 In the context of the Wylfa Newydd Project paragraph 4.5 of the Joint Local Development Plan states:

"The Councils consider that the Wylfa Newydd Project provides a unique and unprecedented opportunity for Anglesey and project promoters to work together to contribute to the socioeconomic transformation of Anglesey and the wider North Wales region, providing sustainable employment opportunities, improving quality of life for existing and future generations and enhancing local identity and distinctiveness."

3.2 Project Objectives

3.2.1 Realising both parties' vision will be achieved through the following objectives:

- 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.

4 Current Position

4.1.1 The following statement addresses four areas of interest to both parties in relation to the Wylfa Newydd Project:

- housing;
- tourism;
- economic development; and,
- transport.

4.1.2 Conwy do not wish to raise objections in relation to any areas of the Project not listed in this SoCG.

4.1.3 The four areas concerned originate from the previous PAC 2 & 3 consultations and the Conwy Local Impact Report (RR-086, REP2- 287, REP2-288 & REP2 – 289). Horizon’s subsequent response to the matters raised (REP3 – 010 & REP4 – 020) are also considered in finalising this SoCG between both parties. It is acknowledged that areas of the SoCG have not progressed in the time anticipated between both parties, but this is partly due to ensuring that a collective approach is undertaken between Welsh Government and other Local Planning Authorities. The outcome of the collective approach and supporting evidence prepared is further considered below in determining which areas are agreed and those that are not.

Housing

Agreed Matter

4.1.4 Horizon has assessed housing demand based on a central case of 3,000 bed spaces in existing accommodation across Anglesey and parts of the mainland. Whilst different patterns of demand could arise and lead to other adverse impacts, the proposed approach of ‘plan, monitor and manage’ is appropriate.

4.1.5 It is agreed that the Gravity Model is a reasonable basis for assessment. The Gravity Model has 20 Non-Home Based workers living in Conwy; this would not give rise to any housing impacts.

4.1.6 In order to manage the impact of temporary construction workers seeking accommodation during the construction of the Wylfa Newydd DCO Project, Horizon will establish an online Worker Accommodation Portal (hereafter referred to as the ‘Portal’) that will be the means by which accommodation providers can advertise to workers and workers can select accommodation that meets their needs. Conwy welcome the ability for properties within the Conwy area to register on the Portal. The Worker Accommodation Management Service (hereafter referred to as the ‘WAMS’) will monitor and report on the take-up of accommodation wherever workers choose to live (i.e. not limited to the KSA). It is agreed that the WAMS is an appropriate mechanism in principle to monitor impacts on the housing market.

4.1.7 It is agreed that the Portal should provide an early warning system of potential future exceedances against agreed criteria. This would allow mitigation to be provided at the point of exceedance as far as reasonably practicable through

release of the Accommodation (Contingency) Fund to be secured through the Draft s.106 agreement. The range of measures to manage impacts should include short-term measures that can be implemented quickly wherever possible, subject to agreement by the appropriate engagement group. Further details are provided in Section 3 of the Wylfa Newydd Code of Construction Practice.

- 4.1.8 If the distribution of workers is different from the Gravity Model and there are housing impacts, Conwy will be able to access contingency funds (i.e. mitigation will follow impacts).
- 4.1.9 The Draft s.106 agreement provides for a specific Worker Accommodation (Capacity Enhancement) Contribution to increase the supply of residential units that can be used to address specific adverse housing effects in Conwy caused as a result of the Wylfa Newydd Project.
- 4.1.10 Conwy would also be consulted by the WAMS Oversight Board on the programme of works to be delivered by the Worker Accommodation (Capacity Enhancement) Contribution, as set out in the Draft s.106 agreement.
- 4.1.11 The Phasing Strategy was updated at Deadline 4 (REP4-014) and states that the Site Campus will be delivered in time for peak construction. Horizon would also deliver the Site Campus in the following three phases:
 - Deliver the first 1,000 beds of Site Campus prior to exceedance of 2,200 Non-Home Based workers.
 - Deliver further 1,000 beds prior to exceedance of 4,200 Non-Home Based workers; and,
 - Deliver the final 2,000 beds prior to exceedance of 6,700 Non-Home Based workers.

Housing Matters Not Agreed

- 4.1.12 Matters not agreed in relation to Housing are set out in Appendix A of REP4 – 053, ‘Joint Post-Hearing Note on Housing and Accommodation Baseline Figures, prepared jointly by Welsh Government, Isle of Anglesey County Council, Gwynedd Council and Conwy Council’.
- 4.1.13 Conwy’s view is that the phasing of Temporary Workers Accommodation previously proposed by Horizon is unacceptable, and in particular will result in a demand for 1,600 bed-spaces from the private sector in the space of the twelve months of Y4. However, Conwy note Horizon’s revised Phasing Strategy submitted at Deadline 4 (REP4-014) and have not yet considered its contents. Conwy therefore currently disagree on phasing of the Site Campus.

Tourism

Agreed Matters

- 4.1.14 The importance of the tourism sector to the local economy is agreed. In recognition of this, Horizon will establish a Tourism Fund which would be available to address any significant adverse effects which could arise on the sector as a result of the Wylfa Newydd DCO Project.

- 4.1.15 A Tourism Action Plan will be prepared with Welsh Government, which would identify activities on which the Tourism Fund would be spent.
- 4.1.16 Mitigation would be provided throughout the construction period and would not focus solely on the period with the maximum workforce. Conwy and Horizon agree this is an appropriate way to manage effects of the Project.
- 4.1.17 It is agreed that Conwy may benefit from the Wylfa Newydd Project in relation to tourism due to the quality of their hotel accommodation stock, significant local tourism operators and high quality natural environment.

Economic Development

Agreed Matters

- 4.1.18 The Wylfa Newydd DCO Project will employ up to 8,500 workers at peak although 9,000 has been used within the Environmental Statement to ensure a robust assessment. The Draft s.106 agreement will secure various mechanisms designed to deliver jobs and skills including the Wylfa Newydd Employment and Skills Service and the Jobs and Skills Implementation Plan, the aim of which will be to promote and source local employment opportunities in respect of the Wylfa Newydd Project. These mechanisms seek to maximise the economic benefits for local residents that would arise from the jobs created as a result of the Project.
- 4.1.19 Horizon will engage with the local supply chain and maximise opportunities for local people by establishing and maintaining an online Supply Chain Portal in accordance with a Supply Chain Action Plan, to be prepared by IAACC, Horizon and the Welsh Government, in accordance with the terms in the Draft s.106 agreement.
- 4.1.20 New job opportunities created by the Wylfa Newydd Project is likely to create a number of different effects within the local labour market, including encouraging existing workers to move from a current job to work directly on the Wylfa Newydd Project, referred to as labour churn. In all economies, business enterprises and employment shift continually as changes in markets and technologies open up new opportunities and reduce others. In a well-functioning labour market, workers move into new occupations, industries and locations following signals given by employment and wage growth.
- 4.1.21 Whilst it is acknowledged that high levels of labour churn could result in impacts not currently assessed, it is agreed that the plan, monitor and manage approach, including the proposed Wylfa Newydd Employment and Skills Service, provides an appropriate framework in principle to help to keep labour churn to a minimum and provide mitigation where impacts occur.
- 4.1.22 Conwy remains concerned that a greater number of families will reside in Conwy than assumed in Horizon's central case, as it contains all of the English-speaking schools within the Key Socio-economic study Area (KSA). Mitigation would be provided through the Education (Contingency) Fund where specific triggers within the Draft s.106 agreement are met (defined as evidence demonstrating enrolment of Workforce Children at a Local School (or school located in Gwynedd or Conwy) which is at or exceeding 95%

capacity). Subject to agreement of the Education (Contingency) Fund through ongoing s.106 discussions, this matter is agreed.

Transport

Agreed Matters

4.1.23 It is imperative that the transport implications for the project are mitigated to ensure that the benefits of the project, jobs and supply opportunities are able to spread as widely as possible across the region; without causing significant increased congestion on key routes and areas where there is existing congestion. It is agreed that the “ES Volume C - Road traffic-related effects (project-wide) App C2-4 - DCO TA Appendix F - Integrated Traffic and Transport Strategy” (APP-107) identifies measures to achieve this which would be secured through the Wylfa Newydd Code of Construction Practice (REP2-031), Main Power Station Site sub-CoCP (REP2-032) and Code of Operational Practice (REP2-037). Further changes which are included within the CoCP (submitted at Deadline 5) include:

- Mode share targets for worker travel for each year of the construction programme in-line with assumptions made in the Transport Assessment.
- More detail on how construction traffic will be managed, including Abnormal Indivisible Loads.
- More detail on how traffic impacts will be monitored.
- More detail on enforcement.

4.1.24 In addition to the above controls, the Phasing Strategy submitted at Deadline 4 (REP4-014) commits Horizon to providing key mitigation by certain dates, including the MOLF, Park and Ride Facility and the Logistics Centre.

4.1.25 The next version of the Code of Operational Practice is to include a target of 1.5 permanent operational workers per vehicle for travel to/from the Power Station Site.