

Wylfa Newydd Project

Statement of Common Ground between Horizon Nuclear Power Wylfa Limited and North Wales Fire and Rescue Service

PINS Reference Number: EN010007

19 February 2019

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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1 Introduction

1.1 Status of this SoCG

- 1.1.1 This Statement of Common Ground (hereafter referred to as the ‘SoCG’ is being submitted to the Examining Authority by Horizon to reflect the position of Horizon and North Wales Fire and Rescue Service (NWFRS) at Deadline 6, in accordance with the examination timetable.
- 1.1.2 The document represents an accurate reflection of the matters discussed between the two parties, including comments provided by NWFRS most recently on 8th February following a meeting on 23rd January. It is not however being submitted as a document endorsed by NWFRS.

1.2 Purpose of this document

- 1.2.1 This SoCG has been prepared by Horizon and reviewed by NWFRS. It has been prepared in accordance with the guidance published by the Department of Communities and Local Government (hereafter referred to as ‘DCLG Guidance’)¹ and example SoCG documents provided on the Planning Inspectorate’s website².
- 1.2.2 Paragraph 58 of the DCLG Guidance states:

“A statement of common ground is a written statement prepared jointly by the applicant and another party or parties, setting out any matters on which they agree. As well as identifying matters which are not in real dispute, it is also useful if a statement identifies those areas where agreement has not been reached. The statement should include references to show where those matters are dealt with in the written representations or other documentary evidence”
- 1.2.3 The aim of this SoCG is to therefore provide a clear position of the state and extent of discussions and agreement between Horizon and NWFRS on matters relating to the Wylfa Newydd Project.
- 1.2.4 This SoCG has evolved through a series of iterative drafts, which have been informed by on-going meetings between Horizon and NWFRS as set out in tables 2-1 and 2-2 below. Most recently the SoCG has been updated to reflect matters discussed between NW and Horizon at a meeting on 23rd January 2019.
- 1.2.5 This SoCG is being submitted to the Examining Authority in relation to the application by Horizon under section 37 of the Planning Act 2008 (the Act) for

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/>

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

1.3 Description of development

The Wylfa Newydd Project

1.3.1 The Wylfa Newydd Project includes:

The Enabling Works

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

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

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

The Wylfa Newydd DCO Project

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

The Nationally Significant Infrastructure Project (NSIP)

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

- **Other on-site development:** including landscape works and planting, drainage, surface water management systems, public access works including temporary and permanent closures and diversions of public rights of way, new Power Station Access Road and internal site roads, car parking, construction compounds and temporary parking areas, laydown areas, working areas and temporary works and structures, temporary construction viewing area, diversion of utilities, perimeter and construction fencing, and electricity connections;
- **Marine works comprising:**
 - Permanent Marine Works: the Cooling Water System, the Marine Off-loading Facility, breakwater structures, shore protection works, surface water drainage outfalls, waste water effluent outfall (and associated drainage of surface water and waste water effluent to the sea), fish recovery and return system, fish deterrent system, navigation aids and Dredging;
 - Temporary Marine Works: temporary cofferdams, a temporary access ramp, temporary navigation aids, temporary outfalls and a temporary barge berth;
- **Off-site Power Station Facilities:** comprising the Alternative Emergency Control Centre (AECC), Environmental Survey Laboratory (ESL) and a Mobile Emergency Equipment Garage (MEEG); and

Associated Development

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

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

Licensable Marine Activities

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

2 Consultation with NWFRS

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

Meeting schedule

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

Table 2-1 -NWFRS meeting schedule

Meeting Date	Attendees	Purpose of Meeting
29 th June 2017	Horizon, NWFRS	Project update
13 th July 2017	Horizon, NWFRS	Project update
8 th September 2017	Horizon Quod Atkins NWFRS	Initial meeting to discuss approach to SoCG
21 st September 2017	Quod / Horizon / NWFRS / Atkins	SoCG meeting
23 October 2017	Horizon / Atkins / NWP / WAST / NWFRS	SoCG & EPCC Construction subgroup
13 November 2017	Horizon / Quod / Atkins / Jacobs / NWP / WAST / NWFRS	SoCG - Design meeting
13 November 2017	Horizon / Quod / Atkins / NWP	SoCG update
20 November 2017	Horizon / Quod / SDG / NWP / NWFRS / WAST	Highways meeting
22 February 2018	Atkins / FRS	SoCG Progress Update / Introductions
27 February 2018	Horizon / Atkins / Quod / NWP / PHW / BCUHB / NWFRS / WAST / WG / IACC / BCA	Safeguarding
1 March 2018	Horizon / Quod / Atkins / BCA / NWP / NWFRS / WAST , BCUHB / PHW	Labour churn meeting

Meeting Date	Attendees	Purpose of Meeting
23 March 2018	Quod / Atkins / NWP / NWFRS	DCO application process
9 May 2018	Horizon/ Atkins/ NWFRS / WAST	Site Visit around Wylfa
30 July 2018	Horizon / NWFRS / NWP / WAST / Savills	EPPC Subgroup
6 August 2018	Quod / Atkins / Horizon / NWFRS / Savills	SoCG progress meeting
5 September 2018	Atkins / NWFRS / WAST / Horizon	NWFRS SoCG Fire Strategy and CSMS Update Meeting
5 September 2018	Quod / Atkins / NWFRS / WAST / Horizon / Steer	Transport Model Update Meeting
8 November 2018	Quod / Bechtel / Horizon / NWFRS	SoCG progress meeting
23 January 2019	Quod/Horizon / NWFRS	SoCG progress meeting

Comments provided by NWFRS

2.1.3 Comments on the Wylfa Newydd DCO Project (prior to and post submission) were provided by NWFRS on the following dates:

Table 2-2 Comments provided by NWFRS

Date	Consultation
December 2014	PAC 1 consultation
25 October 2016	PAC 2 consultation
22 June 2017	PAC 3 consultation
5 December 2017	Comments on draft DCO documents
12 December 2017	Responding to TCPA consultation on Site Preparation and Clearance*
16 January 2018	Responding to TCPA consultation on on-line work A5025*
5 February 2018	Responding to consultation on additional land
30 May 2018	Responding to TCPA consultation on additional information re on-line work A5025*

Date	Consultation
25 June 2018	Responding to TCPA consultation on additional information re Site Preparation and Clearance*
11 August 2018	Relevant Representations
5 September 2018	Comments on draft SoCG
27 September 2018	Responding to consultation regarding Non-material Changes 1 & 2
18 October 2018	Comments on fourth draft SoCG
7 December 2018	Deadline 2 Submission – Written Representations
7 December 2018	Deadline 2 Submission – Response to Examining Authority Written Questions
19 December 2018	Deadline 3 Submission – Response to Examining Authority Written Questions
8 February 2019	Comments of final draft SoCG

*Relating to separate TCPA applications for SPC and On-Line Highways Works only.

2.1.4 The comments made prior to submission of the DCO application were taken into account in the development of final documents to support the DCO. These documents also served to develop, and inform on-going discussions associated with, this SoCG. The PAC 2 and PAC3 comments formed the basis for the topics included in the first draft of the SoCG, since when the topics have evolved in response to the progress of discussions and the examination hearings.

3 Current Position

3.1 Position of Horizon Nuclear Power and NWFRS

- 3.1.1 The following Table (Table 3-1) sets out the position of NWFRS alongside Horizon's position as discussed at the meeting of 23rd January 2019, and subsequent further exchanges of the document in writing.
- 3.1.2 The table sets out matters by topic area and an indication of whether the issue is agreed (green), not agreed (red) or ongoing (amber).
- 3.1.3 Although this represents the final version of the SoCG, in accordance with the examination timetable, points that are "ongoing" or "not agreed" will be the subject of on-going discussion wherever possible to resolve or refine the extent of disagreement between the parties throughout the DCO Examination process (albeit there will be no further opportunity to reflect this in an updated SoCG).
- 3.1.4 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.
- 3.1.5 Whilst Horizon has engaged proactively with NWFRS to develop this final draft SoCG it has not been formally endorsed by NWFRS (although it does fully incorporate all of the comments issued by NWFRS to Horizon on the 8th February).

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

Topic	Sub-Issue	SoCG Reference	Document Reference/Signpost/ Routemap	NWFRS Position	Horizon Position	RAG	Further actions required to progress discussion on the issue
Workforce accommodation strategy	Peak construction accommodation assumptions	NWFRS 1	Workforce Accommodation Strategy (WAS) (APP-412)	<p>The WAS is based on 9,000 construction workers at peak at Q4 of 2023 (based on a central estimate of the size of the workforce of 8,500). 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"> • 4,000 bed spaces on the Site Campus (purpose built Temporary Workers Accommodation on-site); and • The use of 3,000 bed spaces in existing accommodation across Anglesey and parts of the mainland. <p>NWFRS are in agreement that this represents an appropriate basis for service planning. NWFRS agreement is predicated on the assumptions as identified in PAC3 and subsequently identified in the DCO application supporting documentation.</p>	Agreed	No further action	
	Distribution of workers by accommodation type and location		Workforce Accommodation Strategy (WAS) (APP-412) Appendix C1.2 of the Environmental Statement - Socio economic technical appendix (APP-096)	Horizon acknowledge that whilst there is spare capacity in the Private Rented Sector (PRS), there is a potential risk of displacement of some existing PRS tenants			
	Worker accommodation safety / regulation	NWFRS 3	Appendix C1.3 of the Environmental Statement - Community Cohesion Report (APP-097) Health Impact Assessment Report (APP-429) Section A3 Deadline 3 Submission - Development Consent Order Section 106 Agreement (REP3-042) ³	Both parties acknowledge, however, that the proposed mitigation measures (principally through the Worker Accommodation Management Service (WAMS), Site Campus and Worker Accommodation (Capacity Enhancement) Contribution) and monitoring (through the WAMS) would minimise this risk as far as possible.	Agreed	No further action	
	Workforce Accommodation Strategy (WAS) (APP-412) Workforce	Both parties agree that PRS accommodation used by the construction workforce will be required to comply with legal requirements (including being registered with Rent Smart Wales). These legal requirements provide regulation over the standard of accommodation outside Horizon's control.	Agreed	No further action			

³ Note that a revised draft s106 Agreement will be submitted at Deadline 5.

Topic	Sub-Issue	SoCG Reference	Document Reference/Signpost/ Routemap	NWFRS Position	Horizon Position	RAG	Further actions required to progress discussion on the issue	
			Management Strategy (APP-413) ⁴ Draft s.106 agreement	The WAS does however provide a commitment from Horizon that it will work with accommodation providers to ensure that accommodation is of a high enough standard (APP-412, para 3) and meets these legal requirements. Landlords letting spare rooms will also need to demonstrate their properties are fit for renting. Horizon will monitor and manage the distribution of the workforce, through the WAMS which will be secured by the DCO s.106 agreement. An Emergency Services Engagement Group (ESEG) has been constituted under the revised draft DCO s.106 agreement (which will be submitted at Deadline 5). The workforce accommodation monitoring data, collected through the WAMS, would be communicated to NWFRS through the ESEG.				
Advice to workforce regarding risk	NWFRS 4	Workforce Accommodation Strategy (WAS) (APP-412) Chapter 8 Workforce Management Strategy (APP-413) Deadline 3 Submission - Development Consent Order Section 106 Agreement (REP3-042) ⁵ Deadline 2 Submission - Wylfa Newydd Code of Construction Practice (REP2-031)	NWFRS recognise the benefits of ensuring that construction workers are located in safe and suitable accommodation without unnecessarily having a detrimental impact on local communities. Both parties agree, however, that whilst the accommodation may meet safety requirements consideration needs to be given to ensuring that appropriate advice can be provided to the construction workers with regard to personal risk. Both parties agree that there is benefit in engaging NWFRS in the education of the construction workforce on fire safety (which could input into fire safety campaigns and the provision of periodic fire safety briefings to the population of the Site Campus and those within off site accommodation). Horizon and NWFRS will continue to liaise as part of the emerging Community Safety Management Strategy (CSMS), the principles of which are set out in the revised CoCP submitted at Deadline 5 with the submission of a detailed CSMS being secured by a DCO requirement (PW11). Both parties are agreed that any NWFRS involvement in such education would be funded by Horizon through the Emergency Services (Fire) Contribution. The total amount of this contribution is not however agreed.		On-going		NWFRS 8.2.19 comments incorporated into joint statement, though NWFRS have advised they would like the RAG to remain 'on-going'. Forward Action - NWFRS to clarify what action is required for this to become an agreed position (having regard to the timescales for the CSMS – secured by requirement, and the recognition that the financial contribution is an on-going actions).	
Worker shift patterns	NWFRS 5	DCO Transport Assessment (APP-101) Deadline 2 Submission - Wylfa Newydd Code of Construction Practice (REP2-031) Main Power Station Site sub CoCP (REP2-032) Marine Works sub-CoCP (REP2-033) Off-Site Power Station Facilities sub-CoCP (REP2-034)	For the Main Construction works, multiple shift working will be required with 24 hour 7 days per week working in order to deliver a viable construction schedule. Site hours for different stages of construction are set out in the sub CoCPs (which will be updated at Deadline 5) and were subject to a Request for Non-Material Change (at Deadline 4). The assumed shift patterns are in staggered shifts in both the day and night time periods. The start times set out in the Request for Non-Material Change (which have not yet been formally accepted into the examination) are a typical indication and would still allow for 24 hour working for activities such as tunneling and dredging (these activities are listed in the sub CoCPs). All workers will be registered on a database for site security purposes and this will provide a source of data to determine where workers will be living as well as their daily shift patterns. This database will be managed by Horizon and its supply chain, and it will be updated as worker numbers and locations change over the course of the construction period.		Agreed		No further action	

⁴ Note that a revised draft of the WMS will be submitted at Deadline 5

⁵ Note that a revised draft s106 Agreement will be submitted at Deadline 5.

Topic	Sub-Issue	SoCG Reference	Document Reference/Signpost/ Routemap	NWFRS Position	Horizon Position	RAG	Further actions required to progress discussion on the issue
			Park and Ride sub-CoCP (REP2-035) Logistics Centre sub-CoCP (APP-419) A5025 Off-line Highway Improvements sub-CoCP (REP2-036) ⁶ Deadline 4 Submission – Request for Non-Material Change Worker Shift Patterns (REP4-011)	NWFRS agree that the information provided on shift patterns and how this facilitates 24 hour working is satisfactory.			
	Aerial Ladder Platform (ALP) attendance	NWFRS 6	Design and Access Statement (Vol3) (REP2-029))	All roads and paths on the Site Campus (as indicatively shown in the DAS Vol3 (REP2-029) have been designed to accommodate fire tender access and to meet the requirements of Approved Document B (Wales). All paths therefore meet the specifications to ensure that they are wide enough and can support the weight of an Aerial Ladder Platform (ALP). This has been achieved through design discussions between Horizon and NWFRS prior to submission (and NWFRS agreement is predicated on the proposals as presented in the DCO submission). Horizon note that the nearest NWFRS ALP is located in Bangor and has a reach of 30m which is sufficient to fight a fire up to the seven story maximum height of the Site Campus. Horizon's appointed contractors are currently undertaking further planning (in consultation with NWFRS) with regard to the provision of equipment to support capabilities on site and compliment off site services (see below re public service funding).	Agreed		No further action
Site Campus design	Design and layout of the Site Campus	NWFRS 7	Design and Access Statement (Vol1) (APP-407)	The layout of the access and service roads as indicatively shown in Volume 1 of the Design and Access Statement (APP-407) have been carefully considered to link each block and all blocks would be accessible for servicing and emergency vehicle access in accordance with fire regulations. This has been achieved through design discussions between Horizon and NWFRS prior to submission (and NWFRS agreement is predicated on the proposals as presented in the DCO submission). The detailed design for the Site Campus (required by Requirement of the DCO) must provide safe facilities that meet all current requirements for fire safety, including fire sprinklers for all living accommodation in accordance with Welsh building standards.	Agreed		No further action
	Night shift workers	NWFRS 8	Design and Access Statement (Vol3) (REP2-029)	NWFRS advised that it would be useful to understand where 'day sleepers' are located, and if possible the preference would be that Horizon predetermine set accommodation blocks in the Site Campus that would be used by night shift workers. NWFRS note that Horizon cannot commit to this measure, though both parties satisfied that a system could be explored as part of the sharing of information on shift patterns / WAMS database which monitored day sleeping.	Agreed		No further action

⁶ Note that these document references for the CoCP and sub CoCPs will be superseded by the revised drafts at Deadline 5.

Topic	Sub-Issue	SoCG Reference	Document Reference/Signpost/ Routemap	NWFRS Position	Horizon Position	RAG	Further actions required to progress discussion on the issue
Impact on NWFRS resources	On site Fire and Rescue services	NWFRS 9	Wylfa Newydd Fire and Rescue Scope of Services (Draft) – Not a DCO document but appended to the draft s106 (to be submitted at Deadline 5)	The 'Wylfa Newydd – Fire and Rescue Scope of Services (Draft 4)' sets out the proposed scope of fire and rescue services at the WNDA. This sets out fire-fighting specifications and specialist rescue capabilities, along with details of job descriptions, fire prevention and education measures and emergency planning. NWFRS have reviewed the Draft Wylfa Newydd Fire and rescue Scope of Service document and agree to engage with Horizon on this basis.		Agreed	No further action
	Fire and rescue attendance at Off Site Power Station Facilities and Associated Development Sites			NWFRS recognize that incidents at either the Logistics Centre or Park and Ride would be responded to by the nearest available NWFRS resource. Horizon's intention is that the on site fire and rescue service attend to incidents at the Off-Site Power Station Facilities. Further Horizon acknowledge that if the on-site crew had to attend to such an incident appropriate cover would need to be provided at the main site (in order to fulfil requirements to and effect rescue for a suspension trauma within 15 minutes). No further details have been provided as to how this will be secured.	Horizon's intention is that the on-site fire and rescue services could attend to incidents at the Off-Site Power Station Facilities, but would expect NWFRS to attend to incidents at the Park and Ride or Logistics Centre. Horizon acknowledge that if the on-site crew had to attend to an incident at the Off-Site Power Station Facilities appropriate cover would need to be provided at the main site (in order to fulfill requirements for example, to respond to and effect rescue for a suspension trauma within 15 minutes).	On-going	Forward Action – It is not clear at this stage what further detail NWFRS require beyond the draft scope of fire services for the main site. No additional detail is available at this stage.
	Public service funding (s.106 contribution to NWFRS)	NWFRS 10	ES chapter C1 – Socio Economics (APP-088) Deadline 2 Submission - Wylfa Newydd Code of Construction Practice (REP2-031) Design and Access Statement (Vol2) (APP-408) Design and Access Statement (Vol3) (REP2-029)) Deadline 3 Submission - Development Consent Order Section 106 Agreement (REP3-042) ⁷	NWFRS have undertaken an estimate of the scale of funding that would be required over the life of the construction period. This was shared verbally with Horizon at the meeting on 23.1.19 though has not been submitted into the examination.	The ES (Socio Economic Chapter C1) (APP-088) finds that, assuming the increase in incidents attended by the NWFRS is proportional to the additional population, there are expected to be 53 more incidents attended by the NWFRS as a result of the increase in population during peak construction. This is equivalent to a 1.1% increase in the number of incidents in north Wales. Horizon will have in place appropriate management controls to prevent fires on all its construction sites and associated accommodation and welfare facilities (secured in the Wylfa Newydd CoCP). Horizon's response procedures will ensure swift action is taken to protect the public, workers, environment and plant whilst maintaining construction site security. Horizon's strategy is to be largely self-sufficient for Fire and Rescue to avoid impact on local services and ensure adequate response on site (including the main site and the Site Campus). It is recognised, however, that the Wylfa Newydd Project is likely to create demand on the NWFRS and	On-going	Forward Action – NWFRS to provide detailed service planning estimate following discussion on 23.1.19. Remains an outstanding action at 13.2.19.

⁷ Note that a revised draft s106 Agreement will be submitted at Deadline 5.

Topic	Sub-Issue	SoCG Reference	Document Reference/Signpost/ Routemap	NWFRS Position	Horizon Position	RAG	Further actions required to progress discussion on the issue
					<p>as above, there would be an expectation that NWFRS would attend to incidents away from the WNDA (other than potentially at the Off Site Power Station Facilities). Horizon is committed to providing appropriate provision funding for the NWFRS to mitigate impacts resulting from the Wylfa Newydd Project which would not be addressed by Horizon's own Fire and Rescue services. This would be secured in the s106 agreement as the 'Emergency Services (Fire) Contribution'. The draft s.106 agreement provides for a contribution of £1million towards the effects of the Wylfa Newydd Project on the NWFRS, in addition to a commitment to deliver and maintain the scope of fire service as specified in the draft DCO s.106 agreement. Horizon considers that these commitments are appropriate to mitigate the impact on the NWFRS.</p> <p>The scale of funding is not agreed by NWFRS.</p>		
	Potential for staff displacement	NWFRS 11	Jobs and Skill Strategy (APP-411)	<p>NWFRS agree in principle with the NWFRS Scope of Service and understand that potential providers, whilst advertising nationally, will be encouraged not to specifically target North Wales however this does not mean that existing NWFRS staff may be employed, which could have an impact.</p> <p>NWFRS confirmed at the meeting on 23.1.19 that the primary concern was retained (or 'RDS') firefighters taking up positions in non firefighting jobs with Horizon, and being unable to fulfil their roles for NWFRS.</p> <p>As a consequence NWFRS would seek to recruit additional personnel to undertake the role of RDS firefighters thus enabling appliance availability (comment added by NWFRS 11.2.19).</p>	<p>Horizon recognize NWFRS's concern that RDS firefighters may take up non firefighting positions with Horizon or its contractors. Horizon do not consider, however, that this would work any differently to an RDS firefighter working with any other employer, and it is therefore not clear why this would result in the need to recruit additional personnel into RDS roles (in response to NWFRS comments on 11.2.19)</p> <p>Horizon have offered NWFRS the opportunity for further specific dialogue in relation to workforce planning, to work with NWFRS to try to ensure mutually beneficial outcomes through the proposed jobs and skills mitigation measures (including the Jobs and Skills Implementation Plan (JSIP) the detail of which is to be developed through the obligations in the draft DCO s.106 agreement.</p>	On-going	<p>Action: Further dialogue with NWFRS regarding the mitigation proposed through the JSIP</p>
Traffic and transport during construction	Car parking strategy for the Site Campus – use of personal vehicles	NWFRS 12	DCO Transport Assessment (APP-101) Deadline 2 Submission - Wylfa Newydd Code of Construction Practice (REP2-031) Workforce Management Strategy (APP-413)	<p>NWFRS wish to seek clarity on the impact of workers who park at the Site Campus using their vehicles during their own time to visit local areas.</p> <p>Vehicles parked at the Wylfa Newydd Development Area may be used for social / leisure purposes when workers are not on shift. Horizon expect this use to consist mainly of workers travelling on some weekends to/ from their permanent homes (which Horizon expect to occur at off peak traffic times).</p> <p>Horizon propose (as above, under NWFRS 4) to work with NWFRS as part of the emerging Community Safety Management Strategy (CSMS) which could involve NWFRS liaising directly with the workforce for road safety briefings.</p>	On-going	<p>NWFRS 8.2.19 comments incorporated into joint statement, though NWFRS have advised they would like the RAG to remain 'on-going'.</p> <p>Forward Action - NWFRS to clarify what action is required for this to become an agreed position (having regard to the timescales for the CSMS – secured by requirement, and the recognition that the financial contribution is an on-going actions).</p>	

Topic	Sub-Issue	SoCG Reference	Document Reference/Signpost/ Routemap	NWFRS Position	Horizon Position	RAG	Further actions required to progress discussion on the issue
				As per NWFRS 4, both parties are agreed that any NWFRS involvement in such education would be funded by Horizon through the Emergency Services (Fire) Contribution. The total amount of this contribution is not however agreed.			
	Impact on A5025 between Amlwch and Wylfa	NWFRS 13	DCO Transport Assessment (APP-101)	<p>Horizon has investigated the A5025 highway alignment between Amlwch and Cemaes, to determine any existing deficiencies and identify whether improvements would be required to improve the safety of the A5025 in this area. This has involved modelling the alignment to provide an overview of the existing horizontal and vertical alignment and analyzing existing traffic flows and accident data. The traffic flow analysis indicates that this section of the A5025 is running under capacity and any increase in traffic as a result of the Wylfa Newydd Project will be well within theoretical capacity.</p> <p>While this road will be used by construction workers, it is no longer a main commuting route to the site and as such it is not anticipated that this section of the A5025 will need improvement solely due to the proposed Wylfa Newydd Project.</p> <p>As stated in ES appendix C2-3 Traffic Flows – the maximum increase in traffic along this section of the A5025 in any assessment scenario owing to the Wylfa Newydd Development is 4%.</p> <p>However, a Transport (Additional Mitigation) Contribution is available through the draft DCO s.106 agreement and should monitoring indicate that this is an issue then funds can be drawn down if agreed by IACC.</p>	Agreed	No further action	
Assessment methodology (MOLF)		NWFRS 14	DCO Transport Assessment (APP-101) Deadline 2 Submission - Wylfa Newydd Code of Construction Practice (REP2-031)	<p>In early SoCG discussions, NWFRS sought confirmation that the construction traffic impact assessments consider the worst case scenario of 60% of construction material being delivered via the MOLF.</p> <p>The Marine Off-Loading Facility (MOLF) will take between 60% and 80% of all construction materials required for the Power Station.</p> <p>For assessment purposes, the number of construction vehicles required to access the Wylfa Newydd Development Area each day has been calculated assuming that the MOLF receives 60% of construction materials. This minimum target is secured via the WN CoCP. This is a conservative estimate and the target is for the MOLF to receive 80% of bulk materials (the ES is therefore based on the worst case scenario). Based on these assumptions, during the peak of construction activity, up to 40 heavy goods vehicles per hour are expected to travel between the Logistics Centre and the Wylfa Newydd Development Area.</p> <p>The effects of any delays to the MOLF will be managed in accordance with the controls set out in the WN CoCP (which will be updated at Deadline 5).</p> <p>It is agreed between the parties that no further discussions are required with regard to this matter.</p>	Agreed	No further action	
		NWFRS 15	Deadline 2 Submission - Wylfa Newydd Code of Construction Practice (REP2-031) Deadline 4 submission – Request for Non Material Change HGV Delivery Window (REP4-013)	<p>What are the contingencies in the event of a delay in the construction and subsequent deployment of the MOLF?</p> <p>Specific concern is contingency if MOLF is out of action for a long duration.</p> <p>NWFRS note that NMC 5 relating to HGV movements makes reference to the fact that the changes are necessary to facilitate the MOLF being unavailable for or in the event of hold ups on the road network. Would the</p>	<p>Delays to the delivery of the MOLF do not mean that more material would be delivered by road as 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. The next version of the CoCP will include more traffic controls, including lower HGV caps for the early-years (pre opening of the A5025 Off-Line Highway Improvement Works). If the MOLF is, for any reason, out of action for a long duration, the stockpiling of material (up to three</p>	On-going	Action: NWFRS to confirm if there are outstanding concerns following review of NMC 5.

Topic	Sub-Issue	SoCG Reference	Document Reference/Signpost/ Routemap	NWFRS Position	Horizon Position	RAG	Further actions required to progress discussion on the issue
				MOLF be out of action for longer than 3 weeks how will this impact the project.	weeks' worth) on site will enable construction activities to continue without the need for additional road movements.	Yellow	
Times of vehicle movements from Park Cybi	NWFRS 16		DCO Transport Assessment (APP-101) Deadline 2 Submission - Wylfa Newydd Code of Construction Practice (REP2-031) Deadline 4 submission – Request for Non Material Change HGV Delivery Window (REP4-013)	NWFRS requested clarification regarding the times of vehicle movements from Parc Cybi to the construction site. In order to mitigate the impacts of HGV and bus traffic on existing flows, and recreational cyclists, a delivery window on the A5025 for the construction materials has been identified. The delivery window would run from 07:00 to 19:00, Monday to Friday, with restrictions during school start times (between 08:00 and 09:00) and end times (between 15:00 and 16:00) in advance of the A5025 Off-line Highway Improvements being operational. It is anticipated that deliveries may occasionally be undertaken outside of these times, but they will be limited, whenever practicable. These delivery windows are subject to a request for a Non Material Change submitted at Deadline 4. It is agreed between the parties that no further discussions are required with regard to this matter.		Agreed	Action: NWFRS to confirm that the agreed status does not change following review of NMC 5.
Potential for convoy formation	NWFRS 17		DCO Transport Assessment (APP-101) Deadline 2 Submission - Wylfa Newydd Code of Construction Practice (REP2-031)	NWFRS raised an initial concern that the number of construction vehicles on the A5025 from Valley could inadvertently form convoys and could result in inappropriate actions being taken by drivers which could have a detrimental road safety outcomes. Horizon have confirmed that the Logistics Centre will manage deliveries to reduce traffic on and impacts to the local road network. The dispatch of lorries would be controlled to relieve traffic to the Wylfa Newydd Development Area. Robust logistics management will ensure that convoys of delivery vehicles traveling along the A5025 can be avoided and reduce queuing of vehicles entering the Power Station Site. The Main Power Station Site CoCP also contains a clause to dispatch outbound HGVs at regular intervals, to avoid convoying. It is agreed between the parties that no further discussions are required with regard to this matter.		Agreed	No further action
Emergency response times	NWFRS 18		DCO Transport Assessment (APP-101) Deadline 2 Submission - Wylfa Newydd Code of Construction Practice (REP2-031)	NWFRS has a concern regarding the potential impact the development may have in terms of delays in response times due to increased traffic. This should be seen in the wider context i.e. to include those communities accessed off the A5025 along which construction workers may be travelling to/from work. The impact may also be seen in the response times for RDS personnel attending their stations in response to an incident.	The Wylfa Newydd Project includes a series of embedded mitigation measures (set out in the Transport Assessment, APP-101) to address potential congestion. The conclusions of the Transport Assessment are that there is no additional mitigation required in addition to the embedded mitigation. This would reduce the potential for road congestion that could affect emergency response times during construction (in addition to the priority given by other traffic to blue-light journeys). The only area forecast to experience a substantial increase in journey times owing to Wylfa Newydd DCO Project traffic is over the Britannia Bridge in the peak hour of the peak year. The increased journey times over the Britannia Bridge in the peak hour of the peak year have been mitigated as far as practicable by the provision of the MOLF to remove up to 80% of construction material deliveries off the road, and by ensuring the worker shift start and end times do not	On-going	Action: NWFRS to review and confirm position with regard to emergency response times.

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					<p>coincide with AM and PM peak hours of traffic over Britannia Bridge as far as practicable.</p> <p>Furthermore, the Britannia Bridge was originally designed as a 3-lane carriageway but currently operates as 2 lanes. Therefore, there is sufficient width to allow a blue light response vehicle to pass over the bridge down the middle.</p> <p>All other areas of the highway network are not substantially impacted by Wylfa Newydd DCO project traffic.</p>	Yellow	
Refueling	NWFRS 19	Workforce Management Strategy (WMS) (APP-413)		<p>The locations of fuel stations along the A55 and A5025 are shown at Appendix B of Steer's SoCG Transport Further Information note issued on 4th December.</p> <p>It is not envisaged, however, to be necessary for HGVs to refuel whilst on Anglesey as HGVs will have sufficient fuel capacity to undertake a round trip without refueling.</p>	Green		No further action
Construction worker commuting	NWFRS 20	Workforce Management Strategy (WMS) (APP-413) Deadline 2 Submission - Wylfa Newydd Code of Construction Practice (REP2-031)		<p>NWFRS have noted that the proposed shift patterns will lead to individuals working long shifts and then potentially a further 30 minute car journey to their home address or temporary accommodation.</p> <p>Horizon are amending the CSMS principles in the WN CoCP (which will be submitted at Deadline 5), which will extend the geographical coverage beyond the 2.5km radius from the WNDA as originally stated in the CoCP.</p> <p>Horizon propose (as above, under NWFRS 4) to work with NWFRS as part of the emerging CSMS which could involve NWFRS liaising directly with the workforce for road safety briefings.</p> <p>As per NWFRS 4, both parties are agreed that any NWFRS involvement in such education would be funded by Horizon through the Emergency Services (Fire) Contribution. The total amount of this contribution is not however agreed.</p> <p>All personnel will also comply with the Construction Traffic Management Strategy as set out in the Wylfa Newydd Code of Construction Practice (updated for Deadline 5), including speed limits, the highway-code, identified route restrictions and be respectful of other road users including agricultural vehicles, pedestrians, cyclists and livestock.</p>	Yellow		<p>NWFRS 8.2.19 comments incorporated into joint statement, though NWFRS have advised they would like the RAG to remain 'on-going'.</p> <p>Forward Action - NWFRS to clarify what action is required for this to become an agreed position (having regard to the timescales for the CSMS – secured by requirement, and the recognition that the financial contribution is an on-going actions).</p>
HGV journeys	NWFRS 21	Workforce Management Strategy (WMS) (APP-413) Deadline 2 Submission - Wylfa Newydd Code of Construction Practice (REP2-031)		<p>NWFRS noted that HGV journeys from Parc Cybi to main site are calculated on a 22 day working month. In order to provide clarity should this be made explicit to readers i.e. how this is achieved?</p> <p>Horizon clarified that the 22 working days is derived from multiplying 5 working days per week by 52 weeks per year divided by 12 months per year = 21.6 (rounded = 22).</p>	Green		No further action

Topic	Sub-Issue	SoCG Reference	Document Reference/Signpost/ Routemap	NWFRS Position	Horizon Position	RAG	Further actions required to progress discussion on the issue
Shipping	Status of the MOLF / Response to fire on board vessels	NWFRS 22	ES Chapter B15 - shipping and navigation (APP-080) ES Chapter D15 - shipping and navigation (APP-134)	<p>The operation of the MOLF will be subject to a Port Marine Safety Plan which sits outside the remit of the DCO and will be determined by the Department for Transport.</p> <p>Appendix D15-1 of the ES (APP-134) considers scenarios as part of the hazard identification process and subsequent risk assessment. Following the ranking of these risks, only those considered to be most onerous were taken forward to the formal safety assessment and therefore assessed in chapter D15. Sections 15.5.12 and 15.5.13 in chapter D15 (APP-134) consider the scenario of dredge/construction plant on-board fire. Immediate action by the crew in response to a fire is the most effective measure to prevent a larger marine emergency.</p> <p>The on-site fire and rescue service would provide initial response to any vessel on fire alongside the MOLF (including any vessel directed to the MOLF not associated with the project). Marine safety generally including fire-fighting provision offshore will be the responsibility of the Marine contractor initially and then the MOLF operator.</p> <p>Horizon will continue to engage with NWFRS further regarding the emerging plans for on-site provision of equipment (including the timing of fire hydrants, though noting that tankers on site will be able to be mobilised to the MOLF if necessary).</p> <p>Both parties agree that NWFRS may, in some instances, be required to assist / support at any incidents involving a vessel alongside, which may have a consequential impact on NWFRS resources.</p> <p>Both parties are agreed that any NWFRS involvement would be funded by Horizon through the Emergency Services (Fire) Contribution. The total amount of this contribution is not however agreed.</p>	On-going	<p>NWFRS 8.2.19 comments incorporated into joint statement, though NWFRS have advised they would like the RAG to remain 'on-going'.</p> <p>Forward Action - NWFRS to clarify what action is required for this to become an agreed position (having regard to the timescales for the CSMS – secured by requirement, and the recognition that the financial contribution is an on-going actions).</p>	
Emergency preparedness		NWFRS 23	Deadline 2 Submission - Wylfa Newydd Code of Construction Practice (REP2-031) Deadline 3 Submission - Development Consent Order Section 106 Agreement (REP3-042) ⁸	<p>Detailed emergency planning matters will be considered and agreed through the Emergency Services Engagement Group (ESEG) established (and secured through the draft DCO s106 agreement). Both Horizon and NWFRS will be represented on the ESEG.</p> <p>The ESEG will co-ordinate the notification and liaison of various bodies in response to incidents at the Wylfa Newydd site and to maintain appropriate community safety during the construction phase of the Project. The group will meet on a quarterly basis, with the frequency of meetings regularly reviewed to reflect the stage of construction and complexity of activities</p>	On-going	<p>Forward Action: NWFRS to confirm that the arrangements of the updated CoCP and s106 submitted at Deadline 5 are satisfactory and that this line can be agreed</p>	
Environmental incidents	Notification of environmental incidents	NWFRS 24	N/a	<p>NWFRS asked in early SoCG discussions what procedures would be in place to notify NWFRS of any incidents on site and where would NWFRS responsibilities sit for any such incidents.</p> <p>Horizon will be well resourced to deal with Environmental incidents e.g. spills and is unlikely to require NWFRS support for on-site incidents.</p>	Agree	<p>No further action</p>	

⁸ Note that a revised draft s106 Agreement will be submitted at Deadline 5.

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Codes of practice	Code of Construction Practice	NWFRS 25	Deadline 2 Submission - Wylfa Newydd Code of Construction Practice (REP2-031)	NWFRS note the content of the WN CoCP (APP-414) and will engage with the developer in the design of and future implementation of areas of common interest. Horizon are developing a Community Safety Management Strategy (CSMS) within the WN CoCP which will specify and therefore secure the working relationship with NWFRS. The CoCP (which is being updated for Deadline 5) will set out the principles for the CSMS which will be subject to a DCO Requirement for future submission to IACC for approval.		Agreed	No further action
	Code of Operational Practice	NWFRS 26	N/a	NWFRS and Horizon will engage in the design of and future implementation of areas of common interest. This is an agreement in principle and subject to parties agreeing the presented final document.		Agreed	No further action