

# **Wylfa Newydd Project**

## Statement of Common Ground between Horizon Nuclear Power Wylfa Limited and North Anglesey Councils Partnership

PINS Reference Number: EN010007

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Revision 2.0

Examination Deadline 6

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## 1 Purpose of this document

### 1.1 Status of this SoCG

- 1.1.1 This Statement of Common Ground (hereafter referred to as the ‘SoCG’) is being submitted to the Examining Authority as an agreed final version at Deadline 6, in accordance with the examination timetable.
- 1.1.2 It is noted that where this SoCG relies on documents which are due to be submitted at later deadlines in the examination, for example the draft s106 Agreement, this is noted where relevant and may change the status of issues recorded in this version of the SoCG.

### 1.2 Purpose of this SoCG

- 1.2.1 This SoCG is a final agreed document that has been prepared by Horizon Nuclear Power (hereafter referred to as ‘Horizon’) and the North Anglesey Councils Partnership (hereafter referred to as ‘NACP’). 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”*
- 1.2.3 The aim of this SoCG is to therefore provide a clear position of progress and extent of discussions and agreement reached between Horizon and NACP on matters relating to the Wylfa Newydd DCO Project.
- 1.2.4 The preparation of this SoCG has been informed by a programme of discussions between Horizon and the NACP and this SoCG has evolved through a series of iterative drafts. Discussions to inform the first draft were initially managed through the first meeting on 16 November 2017 followed by various meetings subsequently to progress SoCG issues.
- 1.2.5 The first draft of this SoCG was provided by Horizon on 4 December 2017, for input and comment by the NACP. The purpose of the SoCG is to set out agreed factual information about the DCO application made by Horizon for the construction and operation of a new nuclear power station at Wylfa Newydd,

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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/examinations\\_guidance-\\_\\_final\\_for\\_publication.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/418015/examinations_guidance-__final_for_publication.pdf)

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

together with on and off-site associated development (hereafter referred to as 'the Wylfa Newydd DCO Project').

- 1.2.6 A series of subsequent meetings were held between the NACP and Horizon Nuclear Power. Please refer to Table 3-1 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 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.

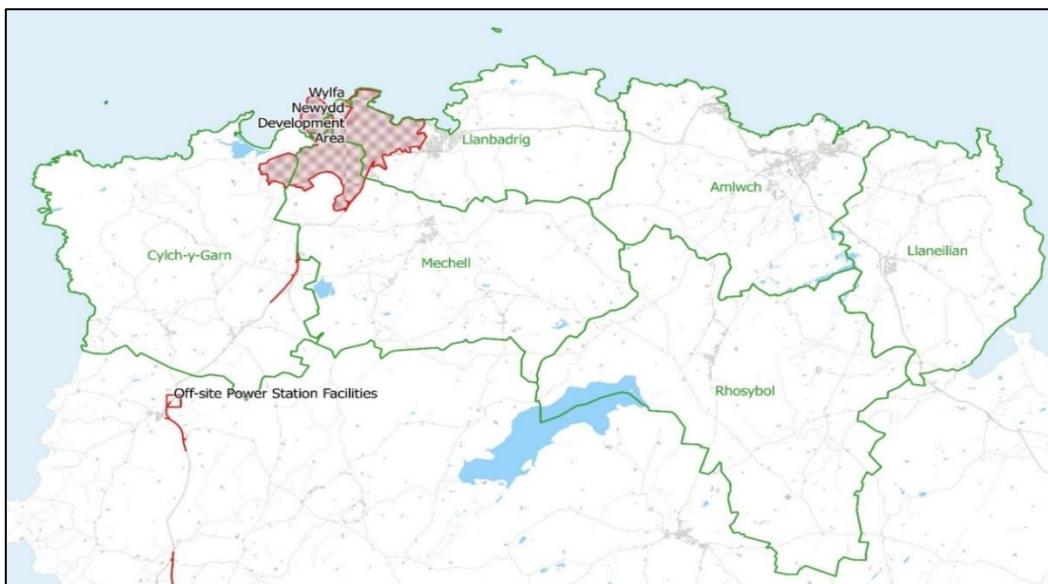
## **Licensable Marine Activities**

- 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 Role of the North Anglesey Councils Partnership

- 2.1.1 The North Anglesey Councils Partnership (NACP) is a partnership between the town and community councils of Amlwch, Cylch y Garn, Llanbadrig, Llaneilian, Mechell and Rhosybol. The NACP is therefore collectively representative of the host community in terms of the Wylfa Newydd DCO Project.
- 2.1.2 Each community and town council has particular issues depending on their proximity to the constituent parts of the Wylfa Newydd DCO Project and the characteristics of their community. There are however certain issues which relate to the wider north of Anglesey area and therefore the six community councils have engaged with Horizon collectively on this SoCG.
- 2.1.3 Horizon is also engaging with Mechell Community Council and Llanbadrig Community Council in independent Statements of Common Ground to focus on locally specific issues that do not necessarily relate to the broader views of the community councils which make up the NACP.
- 2.1.4 This SoCG is therefore structured by first setting out the position of the NACP and then setting out the individual positions of the community councils, where relevant.
- 2.1.5 The figure below sets out the area covered by the NACP in relation to the Wylfa Newydd Development Area (WNDA).

**Figure 2-1 Geographical extent of the NACP**



### 3 Overview of Engagement

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

**Table 3-1 Summary of SoCG Meetings**

Meeting Date	Attendees	Purpose of Meeting
16 November 2017	Horizon, DWD, representatives of NACP	Initial meeting to discuss approach to SoCG and key issues from PAC2 and PAC3 consultations
12 December 2017	Horizon, DWD, representatives of NACP	Follow up meeting to discuss issues and potential approach to resolution
1 May 2018	Horizon, DWD, representatives of NACP	Follow up meeting to discuss issues and potential approach to resolution
9 August 2018	Horizon, DWD, Steer (Transport Consultants), representatives of NACP	Meeting focused on transport issues
12 September 2018	Horizon, DWD, Quod (Accommodation Topic Expert), representatives of NACP	Meeting focused on accommodation issues
24 January 2019	Horizon, DWD, representatives of NACP	Final meeting to seek to resolve ongoing issues and agree text of SoCG
8 February 2019	Representatives of NACP	Final updated comments on transport issues received

3.1.2 As part of Horizon's engagement on the issues identified by the NACP, further information was provided as follows, together with the agenda for each meeting or updated SoCG that was issued:

- 1<sup>st</sup> draft SoCG issued 4<sup>th</sup> December 2017 with presentation on SoCG process
- 2<sup>nd</sup> draft issued 29<sup>th</sup> June 2018 without any supplementary documents issued
- 3<sup>rd</sup> draft issued 25<sup>th</sup> July 2018 alongside Steer (transport consultant) response to Wood (NACP's planning advisor) on transport issues

together with traffic counts and a presentation for the next meeting on transport

- 4<sup>th</sup> draft issued 7<sup>th</sup> September 2018 with Horizon's "Managing Construction Noise and Vibration" consultation note (September 2018) and responses to a number of queries
- 5<sup>th</sup> draft issued 10<sup>th</sup> October 2018 with copy of the Examining Authority's Rule 6 Letter.

## 4 Current Position

### 4.1 Position of Horizon Nuclear Power and NACP

- 4.1.1 The following schedule sets out the position of NACP alongside Horizon's position following initial schedule of meetings where NACP's key issues were discussed. It sets out matters by topic area and an indication of whether the issue is agreed (green), not agreed (red) or ongoing (amber).
- 4.1.2 It is recognised that there will be some issues that are yet to be agreed which relate to information to be submitted later in the examination process. For these issues, the table sets out the current position based on the information submitted to date.
- 4.1.3 The NACP do not wish to raise objections in relation to any other areas of the project.

**Table 4-1 Statement of Common Ground between the NACP and Horizon**

Topic	Sub Topic	Issue	SoCG ID	Document Ref/ Signpost/ Routemap	NACP Position	Horizon Position	RAG	Action required to inform discussion on the issue
Principle of Development	Support for Project	Principle of Development	NAP01	Chapter C1 (Project-wide effects – Socio-economics) (APP-088)	The NACP supports the Wylfa Newydd DCO Project in principle, in particular in relation to the economic benefits in terms of jobs and skills, but wishes to ensure that the development comes forward in a way which minimises the impact on the local area, and North Anglesey in particular, and maximises the benefits.		Agreed	No further action
Welsh Language	DCO Documents	Consideration of Welsh Language	NAP02	Workforce Management Strategy (APP-413)  Welsh Language Impact Assessment, including Appendix 11 which details the Culture Mitigation and Enhancement Strategy. See also Tables 3-1 – 3-4 of Appendix 11 which summarises the mitigation and enhancement measures (APP-432)	The NACP have adopted IACC's position on Welsh Language and Culture.	<p>Please refer to Horizon's SoCG with IACC for further information.</p> <p>Horizon has prepared a Welsh Language Impact Assessment which accompanies the DCO application and sets out the impact of the Wylfa Newydd DCO Project on the Welsh language and culture. This has informed the Welsh Language Mitigation and Enhancement Strategy which sets out a range of mitigation measures which will be secured by the s.106 legal agreement.</p> <p>The draft s.106 agreement outlines Horizon's commitments to Welsh Language and Culture mitigation which includes an annual contribution from Horizon to IACC during the construction period as well as an annual contribution to IACC to fund a Welsh Language Officer who will be responsible for developing measures to ensure continued Welsh speaking characteristics of organisations and activities in local communities.</p> <p>The draft S106 agreement also includes a commitment by Horizon to circulate welcome packs to workforce dependents who move to the KSA on information on local services and the community in addition to the Community Translation Service Contribution paid to the Council to establish and fund a community translation service during the construction period. The contribution will serve local community groups to enable better engagement with the Wylfa Newydd Project for example by providing simultaneous translation facilities for community groups engaging on the Wylfa Newydd Project.</p> <p>Horizon has also appointed a Welsh Language and Culture Coordinator. This role will be key to engaging with the local community and local organisations on Welsh language and culture mitigation measures and activities.</p> <p>Horizon have established a Workforce Management Strategy (APP-413) which is to be updated at Deadline 5, which through its principles will help Horizon to manage its contractors and workforce and guide the development of the Wylfa Newydd Code of Conduct. The Workforce Management</p>	Not Agreed	No further action

Topic	Sub Topic	Issue	SoCG ID	Document Ref/ Signpost/ Routemap	NACP Position	Horizon Position	RAG	Action required to inform discussion on the issue
						Strategy is a control document, it sets out the principles which Horizon and its partners will follow to manage and control the behaviours of contractors and the workforce. Horizon will be required to develop a Code of Conduct with its partners in accordance with the principles set out in the WMS for the management of workforce conduct, as well as specific protocols of those residing at the Site Campus. Workers and Contractors will then be required to comply with the resulting Code of Conduct through their contractual agreements. Importantly the Code of Conduct will inform the community of the standard of behaviours they should expect from workers and their employers through the publication of the Code of Conduct, which should reduce any amenity impacts. Horizon will work collaboratively with its partners and supply chain to ensure that everyone involved in the project understands the need to respect local communities when working on the project and are focused on helping to mitigate potential effects on local communities. This will be secured through the code of conduct as part of the labour agreement between Horizon and its contractors.	Red	
Transport	Traffic	Number of Vehicles	NAP03	8.6 Wylfa Wylfa Newydd Code of Construction Practice (REP2-031)  ES Volume C - Road traffic-related effects (project-wide) App C2-4 - DCO Transport Assessment (APP-101)	Concerns about increased number of vehicles - cars and construction traffic - on the A5025 from the bridge to the site. NACP are also concerned about non-motorised users as explained in submission at Deadline 4 by Councillor Dafydd Griffiths.	Horizon is considering the written submission from Councillor Dafydd Griffiths submitted at Deadline 4 in respect of the cycle strategy and will continue discussions on this issue outside of the SoCG.	Ongoing	Horizon to programme meeting with NACP to discuss provision for cyclists once team has had opportunity to consider Mr Griffith's Deadline 4 submission. Ongoing discussions to take place outside of the SoCG process.
	Traffic	Vehicular Movements		Wylfa Newydd Code of Construction Practice (REP2-031)  ES Volume C - Road traffic-related effects (project-wide) App C2-4 - DCO TA Appendix F -	NACP had raised issues regarding construction workers and construction delivery traffic not using park and ride facilities or travelling along the A5025 from Valley and instead taking direct routes and short cuts to the site causing risks in Llanfechell and Tregele. All traffic flows and predicted increases in traffic owing to the Wylfa Newydd DCO Project are set out in ES Appendix C2-3 – Traffic Flows. This shows that flows are expected to increase more than 3% through Llanfechell and no more than 4% on the A5025 to the north of the WNDA owing to the Wylfa Newydd DCO Project.  Horizon understands concerns about workers using B, C, and unclassified road types, through villages such as Llanfechell, when they could use A-roads (mainly the A5025). A change will be made to the CoCP (due to be submitted at Deadline 5) stating that the Code of Conduct will include a clause requiring construction workers to stick to 'A' class roads and	Agreed	No further action	

Topic	Sub Topic	Issue	SoCG ID	Document Ref/ Signpost/ Routemap	NACP Position	Horizon Position	RAG	Action required to inform discussion on the issue	
				Integrated Traffic and Transport Strategy (APP-107)	<p>avoid 'B' and 'C' class roads wherever practicable to avoid causing unnecessary nuisance and disturbance to local communities.</p> <p>Furthermore, the CoCP will be updated at Deadline 5 to include:</p> <ul style="list-style-type: none"> <li>• In addition to the peak construction year HGV caps, commitment to limit HGV movements on the A5025 pre-opening of the A5025 Off-Line Highway Improvements to that assessed in the Transport Assessment [APP-101]: <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> </li> <li>• Mode share targets for worker travel for each year of the construction programme in-line with assumptions made in the Transport Assessment [APP-101] and in line with the mode share information previously supplied to NACP.</li> <li>• The provision of a Travel and Logistics Manager who will be responsible for controlling and coordinating logistics and construction workers travel across the Wylfa Newydd DCO Project</li> <li>• Commitment to introduce shuttle bus routes from the start of the construction programme</li> <li>• More detail on how construction traffic will be managed, including AILs, and 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</li> <li>• More detail on how traffic impacts will be monitored</li> <li>• More detail on enforcement measures</li> </ul> <p>The Phasing Strategy [REP4-014], which is also a control document, commits Horizon to providing key mitigation such as the Temporary Workers Accommodation and MOLF. Any delay in the provision of mitigation would not enable Horizon to increase HGV flows above the caps already stated in the CoCP [REP2-031] and further early-years HGV caps to come in the next version of the CoCP due to be submitted at Deadline 5.</p> <p>It is agreed that the additional changes to be made to the CoCP are sufficient to address the concerns of NACP on this matter.</p> <p>NACP also requested further details on construction traffic using the A5025 between Cemaes and Amlwch. Horizon have provided the additional information requested. The prioritised route for HGVs travelling to and from the site would via the A5025 to the south (via Valley) making use of the A5025 bypass improvements, unless a particular supplier is located to the east along the A5025 which are forecast to be negligible and if did occur would comprise of plant supply companies who tend to deliver individual items of plant to site on an infrequent basis) or other extenuating circumstances prevail, such as a diversion put in place by North Wales Police.</p> <p>It is therefore agreed that this is sufficient and no further action is required on this matter.</p>				
Traffic	Car Parking		NAP05	Wylfa Newydd Code of Construction Practice (REP2-031)  Wylfa Newydd Code of	<p>NACP had expressed concern about uncontrolled parking for workers who are required to car share and had requested Horizon to look in to providing additional Park and Ride facilities for people who live locally.</p> <p>In response to the above issues, Horizon has also strengthened the commitment to enforce the traffic and transport management strategy in the CoCP submitted at Deadline 2 by including the following text:</p> <p>"Horizon commits to manage, monitor and regulate the availability of car parking spaces to reflect the number of workers on the Project, balancing an over-provision of car parking</p>		Agreed	No further action	

Topic	Sub Topic	Issue	SoCG ID	Document Ref/ Signpost/ Routemap	NACP Position	Horizon Position	RAG	Action required to inform discussion on the issue	
				Operational Practice (REP2-037)  ES Volume C - Road traffic-related effects (project-wide) App C2-4 - DCO TA Appendix F - Integrated Traffic and Transport Strategy (APP-107)  Workforce Management Strategy (APP-413)	<p>(which could encourage car travel) with an under-provision of car parking (which could encourage fly parking). Included in the information packs will be likely enforcement actions for breaches of the travel commitments made in this Wylfa Newydd CoCP, with examples such as:</p> <ul style="list-style-type: none"> <li>improvement to communications protocol and channels;</li> <li>appropriate warnings;</li> <li>temporary or permanent removal of approval to park on site;</li> <li>temporary suspension or permanent removal of suppliers(driver/workers who continually fail to adhere to the commitments set out in this Wylfa Newydd CoCP.”</li> </ul> <p>Regarding fly-parking, a dedicated and free telephone hotline will be made publicly available for members of the public to report suspected fly parking activity associated with the Project. All suspected incidents of fly-parking and rat-running will be investigated within 5 working days of the initial complaint being submitted to Horizon. All calls will be logged and mapped, together with a record of the responses and action taken. Workers who are caught fly-parking will face enforcement action, including disciplinary procedures as detailed in the Workforce Management Strategy (paragraph 6.5.42 of APP-413). A similar management procedure has been employed at the Hinkley Point C project and is deemed to be successful by local Councils.</p> <p>With respect to alternative park and share facilities, 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. This statement will be added to the next version of the CoCP to be submitted at Deadline 5.</p> <p>It is agreed that the additional changes to be made to the CoCP (due to be submitted at Deadline 5) are sufficient to address the concerns of NACP on this matter.</p>				
Traffic	Traffic Management		NAP06	Wylfa Newydd Code of Construction Practice (REP2-031)	Both parties recognise that Horizon and its supply chain has 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 measures outlined in the revised CoCP submitted to the Examining Authority at Deadline 2 [REP2-031]. The updates to the CoCP submitted at Deadline 5 include a commitment for Horizon to prepare a Traffic Incident Management Scheme (TIMS) in consultation with Gwynedd Council, Welsh Government and the North Wales Police, for submission to IACC for approval.	Agreed	No further action		
Construction Workers	Construction Worker Profile		NAP07	ES Volume C - Road traffic-related effects (project-wide) App C2-4 - DCO Transport Assessment (APP-101)	Following confirmation from Horizon, NACP and Horizon agree that Figure 7-1 in the Transport Assessment 'Construction worker profile – by location of work site' provides estimated construction worker numbers based on daily numbers during the specified period.	Agreed	N/A – The data confirmation requested has been received by the NACP		

Topic	Sub Topic	Issue	SoCG ID	Document Ref/ Signpost/ Routemap	NACP Position	Horizon Position	RAG	Action required to inform discussion on the issue
	Construction Workers	Construction Vehicle Profile	NAP08	ES Volume C - Road traffic-related effects (project-wide) App C2-4 - DCO Transport Assessment (APP-101)	Horizon provided the data for Figure 7-6 in the Transport Assessment 'Construction vehicle profile (one way movements)' and the NACP now understand the vehicle profile figures. Previously the NACP were unable to read the individual numbers displayed on the graph.		Agreed	N/A – The data requested by the NACP has been received and common ground has been reached on the data
	Construction Workers	Public Transport	NAP09	ES Volume C - Road traffic-related effects (project-wide) App C2-4 - DCO Transport Assessment (APP-101)  Deadline 1 Submissions – Request for Change Working Hours (REP1-017)	The NACP has previously raised concerns about how the workers not residing on the site campus are anticipated to travel and the estimated number of vehicle movements on the network, the routes that will be taken by these vehicles and implications of shift times.  However, following the proposal to make changes to shift patterns from those originally submitted in the DCO application, that were out for consultation between 8 November – 6 December 2018 [REP1-017], both parties recognise that the proposed change to the structure of working vehicles will assist in reducing impacts on local communities.  This agreement is provisional on the RfNMC being accepted into Examination by the Examining Authority.		Agreed	No further action
Highway Network	New Proposed Site Access	NAP10		A5025 Off-line Highway Improvements sub-CoCP (APP-420)	The new power station access road junction, which is part of the A5025 Off-line highway improvements, is due to be completed during 2020 and construction vehicles will access the site via the existing junction with the A5025 in the meantime.  The NACP considers that a pedestrian crossing in Tregele is necessary to increase safety however both parties agree that such works have not been proven to be necessary and the responsibility for a pedestrian crossing here would be the responsibility of IACC.		Agreed	No further action
Traffic Flows	Raw ATC Data	NAP11		ES Volume C - Road traffic-related effects (project-wide) App C2-3 - Traffic Flows (APP-100)	The NACP has received ATC survey data for numerous stretches of the road network, listed in Figures 1-1 and 1-2 in ES Volume C – Road traffic-related effects (project-wide) AppC2-4 – DCO TA Appendix D – Traffic Data Report [APP-100]. The NACP is satisfied that they have been provided sufficient information to understand vehicle speeds and other information on the highway.  Horizon most recently issued the following data on 22 January 2019:  Link 21: A5025 Section 9 – along the A5025 crossing Tregele Link 22: A5025 Tregele to Amlwch Link 38: Rhos-y-bol to Cemaes Link 45: Ffordd-Y-Felin to Tregele via Cromlech Terrace		Agreed	No further action
Transport Assessment	Construction Vehicles	NAP12		ES Volume C - Road traffic-related effects (project-wide) App C2-4 - DCO Transport	NACP requested further details on construction traffic using the A5025 between Cemaes and Amlwch. Horizon have provided the additional information requested. The prioritised route for HGVs travelling to and from the site would be via the A5025 to the south (via Valley) making use of the A5025 bypass improvements, unless a particular supplier is located to the east along the A5025. The prospects for this occurring are negligible and if this did occur it would comprise of plant supply companies who tend to deliver individual items of		Agreed	No further action

Topic	Sub Topic	Issue	SoCG ID	Document Ref/ Signpost/ Routemap	NACP Position	Horizon Position	RAG	Action required to inform discussion on the issue
				Assessment (APP-101)	plant to site on an infrequent basis; or other extenuating circumstances prevail, such as a diversion put in place by North Wales Police.  It is therefore agreed that this is sufficient and no further action is required on this matter.			
	Transport Assessment	AIL Loads	NAP13	ES Volume C - Road traffic-related effects (project-wide) App C2-4 - DCO Transport Assessment (APP-101)  ES Volume C - Road traffic-related effects (project-wide) App C2-4 - DCO TA Appendix F - Integrated Traffic and Transport Strategy (APP-107)	NACP expressed concerns about the number, timing, routes and composition of AILs on the local highway network. As described in Section 7.5.9 of the Transport Assessment [APP-101], the majority of AILs are to be delivered via the MOLF with a further 1,150 AILs likely to be transported via the road network over the course of the nine-year construction programme. This will include transporting AILs along the upgraded and improved A5025 to reach the Wylfa Newydd Development Area. Appendix A of the ITTS (Appendix F of the TA) describes freight transport routes and details why road based transport was chosen for the delivery of these additional AILs.  For reference the term AIL covers a variety of plant and will include wide and heavy loads associated with delivery of large Earthmoving Equipment – excavators, dumper trucks, dozer equipment, delivery of Batching Plant Modules and to a lesser extent temporary worker accommodation modules.  The latest CoCP, to be submitted at Deadline 5, includes a commitment to prepare an AIL Management Scheme for IACC's approval, in consultation with Gwynedd Council, Welsh Government and the North Wales Police.  It is therefore agreed that the additional information supplied is sufficient to address the issues raised by NACP and no further action is required on this matter.		Agreed	No further action
Accommodation	Alternative Site	Rhosgoch	NAP14	Site Selection Report - Volume 4 - Temporary Workers' Accommodation (APP-439)	The NACP are reluctant to endorse all TWA on the WNDA. If it were the case that the ExA placed a restriction on numbers on site, NACP believes the remaining balance could be readily accommodated at Rhosgoch for the reasons in the NACP note submitted at Deadline 4.	Horizon does not believe that additional accommodation at Rhosgoch is necessary, nor is it an alternative to the Site Campus. Horizon's approach and justification in relation to the site selection process for TWA is set out in detail in the Site Selection Report Volume 4 – Temporary Workers' Accommodation [APP-439]. The Site Selection Report explains how other alternative sites, including sites in Amlwch (Rhosgoch), Holyhead and other locations were considered, and why these were rejected.	Not Agreed	No action required
Accommodation	Workers	Impact of Workers on Communities	NAP15	Workforce Management Strategy (APP-413)  Design and Access Statement – Volume 3 – Associated Developments and Off-Site Power Station	NACP are concerned about the implications of a large number of contractors living close to communities and it is imperative that these impacts are mitigated. NACP cannot comment on whether the mitigation measures are appropriate as they are not sighted on the discussions with North Wales Police on the strategy.	Horizon's strategy for mitigating the impacts is set out within the Workforce Management Strategy (WMS) [APP-413] which includes a Code of Conduct that will form part of a labour agreement between Horizon, the Trade Unions and its contractors. Enforcement and relevant procedures for addressing misconduct will be secured through the labour market. The WMS sets this out in detail which includes project induction programmes, random drug and alcohol testing and collective Welsh language and Culture Awareness and training among other measures.  The monitoring and management of breaches in health, safety and environment standards as well as breaches in Code of Conduct will be conducted.	Not Agreed	No action required

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				Facilities (Part 1 of 2) (REP2-029)		The Site Campus also has a wide range of facilities for use by workers including sports pitches, a small shop, bar etc which will encourage them to stay on the campus as much as possible. A list of these facilities is provided in paragraph 4.3.77 of Design and Access Statement – Volume 3 – Associated Developments and Off-Site Power Station Facilities (Part 1 of 2) (REP2-029) submitted with the DCO. Horizon welcomes the opportunities for leisure that will be provided by local businesses and intend to be proactive in creating positive actions for recreational tourism opportunities for staff. It is imperative for all workers that leave the Site Campus for recreation to behave appropriately and respectfully.	Red	
Accommodation	Rented Accommodation	Lack of Supply	NAP16	Workforce Accommodation Strategy (APP-412) Mitigation Route Map (REP2-038)	The NACP is concerned there is already a shortage of rented accommodation for young families at an affordable rate and these people will be in competition with contractors on high wages and are likely to be displaced. The NACP is disappointed Horizon has not quantified its commitment to accommodation mitigation through a housing fund that might alleviate the issue of a shortage of rented accommodation.	Horizon's position is that in addition to accommodation provision on the Site Campus, there is forecasted capacity within existing accommodation in various sectors, not just the private rented sector (PRS), to accommodate workers.  The WAMS, which is to be secured through the draft DCO s.106 Agreement has been developed to ensure a balanced approach to accommodating its workers as set out within the Workforce Accommodation Strategy [APP-412]. Horizon's estimates of availability (or headroom) are conservative. There is less capacity in the PRS sector and Horizon is proposing to mitigate this issue through investing in the housing market through the Worker Accommodation (Capacity Enhancement) Contribution alongside the monitoring and management of the residential sector via the WAMS.  Horizon is working with IACC to define an appropriate size of a Worker Accommodation (Capacity Enhancement) Contribution that could be called upon to address a number of issues, including lack of availability of private rented accommodation. Horizon is committed to providing an appropriately sized fund which is sufficient to address the impacts of the Wylfa Newydd DCO Project	Not Agreed	No further action

Topic	Sub Topic	Issue	SoCG ID	Document Ref/ Signpost/ Routemap	NACP Position	Horizon Position	RAG	Action required to inform discussion on the issue
Tourism	Impacts on Visitor Numbers	Anglesey Coastal Path (forming part of the Wales Coast Path)	NAP17	Landscape and Habitat Management Strategy (REP2-039) Right of Way Plans (REP2-016) Main Power Station Site sub-CoCP (REP2-032).	<p>NACP acknowledge the difficulties in providing a seaward route for the Coastal Path during the construction phase, due to the use of the MOLF and the construction activities taking place along the shoreline.</p> <p>The NACP recognise that Horizon has provided further justification in their Deadline 4 response to actions set in Issue Specific Hearing on 9 January 2019 and would wish to review this before commenting further on the suitability of the diversion during operations. If a seaward route during operations cannot be delivered, the NACP are concerned with the length of the operational diversion and how far inland, away from the Power Station site, this runs.</p> <p>The NACP is pleased the permanent Visitor Centre is to be delivered early (following implementation) as this represents a significant benefit to the tourism sector and legacy more generally.</p>	<p>Horizon acknowledges NACP's comments in relation to why a seaward route for the WCP diversion was discounted. Horizon has submitted further justification to the Examining Authority within Horizon's Deadline 4 response to actions set in Issue Specific Hearing on 8 January 2019.</p> <p>Due to the nature of locating a Nuclear Power Station in a coastal location, impacts on coastal access and public rights of way is unavoidable, particularly during construction. Nonetheless Horizon is committed to providing additional mitigation measures to reduce these impacts as far as is practicable, including payment to IACC, as part of the DCO s.106 agreement, for them to spend on improving other PRoW in the vicinity of the site or elsewhere on the Wales Coast Path on Anglesey, to improve the PRoW network overall. This could include provisions to allow for e.g. physical improvements to the PRoW network, information boards, benches and other recreational features designed to enhance the experience of using the PRoW network.</p> <p>In addition, the LHMS has been uploaded and has been submitted at Deadline 5 to change the proposed route of the Wales Coast Path during operation which will reduce the length of the diversion by approximately 1km (REP2-039).</p> <p>Horizon has committed to the early delivery of the permanent Visitor Centre following implementation of the Wylfa Newydd DCO Project. The draft s.106 agreement commits Horizon to apply for planning permission for a Visitor Centre within three months of Implementation of the Wylfa Newydd DCO Project or as soon as reasonably possible thereafter, and to implement such planning permission in order to target opening of the Visitor Centre within two years from the grant of permission.</p>	Not Agreed	No further action for SoCG however discussions with NACP to continue
	Impacts of Workers	Accommodation	NAP18	ES Volume C - Road traffic-related effects (project-wide) App C2-4 - DCO Transport Assessment (APP-101) ES Volume C - Project-wide effects App C1-2 - Socio-economic	<p>Local community anticipate that many of the people deemed "local" by Horizon i.e. – 90-minute commute will not tolerate travelling after an 11 hour shift and will instead stay temporarily at caravan sites nearer to the power station as a cheaper and safer alternative to travelling daily. NACP would not agree with changing caravan sites to all year round occupation.</p> <p>There are concerns regarding the possibility of caravan sites either a) becoming licensed for 12 months, b)</p>	<p>The 90-minute Daily Construction Commuting Zone (DCCZ) is the maximum distance that we anticipated workers may choose to travel to work on the project, based on experience from other major projects. Horizon has also developed a "gravity model" which enables it to make assumptions on where workers may choose to live, to enable an assessment of potential effects. This shows very few people living more than 60 minutes from the power station site and the majority of people living within 30 minutes. The reason a wider area has been used is to allow a "worse-case" assessment of effects, particularly from a transport and jobs perspective. Whilst the "gravity model" is a helpful tool for assessment</p>	Not Agreed	No further action

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Services	Pressure on Services			technical appendix (APP-096)	being at capacity and unable to welcome visitors and tourists, c) unlicensed sites being utilised by contractors. Members consider that developing the Rhosgoch site for such a facility would be appropriate. Horizon note that they are still working with IACC on this issue and NACP are unable to provide a final position on this as discussions are ongoing.	purposes, it is recognised that it is difficult to accurately identify precisely where workers will choose to live and so Horizon is proposing to monitor this through a Worker Accommodation Management Service that all workers will be default registered to. This will set locally agreed targets by settlement and identify where the number of workers in any particular settlement or form of accommodation is getting close to targets. It will also enable them to then be directed to other forms of accommodation. It is anticipated that some workers will choose to live in caravans and we are working with IACC to understand the number that may be available to workers. The Worker Accommodation (Capacity Enhancement) Contribution could also be used to assist with enforcement of unauthorised caravan sites. Horizon's estimate of caravans that could be available to workers has assumed a reduction for those that are not permitted to be occupied throughout the year.		
					Concern about increased pressures on services that are already stretched to capacity and the substantial demands on health facilities should be addressed now. It is imperative that Horizon will have sufficient professional occupational health facilities onsite.	Horizon will deliver a health and welfare programme to all of its workers whether they live in the Site Campus, reside locally, or travel to Wylfa Newydd. This programme will ensure that local community health and welfare services and resources used by local residents are not adversely affected by the Project. The central feature of this will be the provision of a bespoke on-site medical centre which will provide occupational healthcare, GP service and primary care for minor inquiries for the entire workforce.  The WMS directs all personnel (not just those residing on the Site Campus) to use the Site Campus Medical Centre in the first instance, before seeking to use community healthcare services. This is an integral component of Horizon's undertaking to minimise potential adverse impacts on local community health and welfare services and resources used by local residents.  Furthermore, the draft s106 agreement outlines the scope of contributions to mitigate potential unacceptable impacts on services. The contributions include Health Payments by the Developer to the Betsi Cadwaladr University Health Board (BCUHB) during the construction period to ensure mitigation for use of NHS facilities. The draft DCO s.106 agreement also includes commitments to a Health (Contingency) Fund which will be managed by the Health and Wellbeing Engagement Group (comprised of a representative from the Council, the Developer, the Welsh Government, BCUHB and Public Health Wales. The Group will monitor health	Not Agreed	No further action

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						and wellbeing matters and advise on and agree release of the Health (Contingency) Fund which will be paid to IACC for onward payment to BCUHB or an alternative health and wellbeing service in the relevant circumstances set out within the draft s106.		
Pollution	Quality of Life	Noise/Vibration	NAP20	Landscape and Habitat Management Strategy (REP2-039) Wylfa Newydd Code of Construction Practice (REP2-031) Health Impact Assessment Report (APP-429)  Local Noise Mitigation Strategy Update (REP3-050)  Local Noise Mitigation Strategy (Companion Guide) (REP3-051)	Disturbance through noise, dust, light pollution and working hours on immediate neighbours will have a profound impact on quality of life.  The NACP considers that notwithstanding Horizon submitting additional information at Deadline 3 on how properties will be identified and notified of their eligibility under the extended LNMS that Horizon's consultation with affected residents is inadequate.	Horizon will work in accordance with the WNCoCP (REP2-031) and Main Power Station Site sub-CoCP (REP2-032) with regard to dust, noise, congestion and nuisance to help mitigate impacts on local residents. In terms of light pollution and impact on sleep, Horizon is committed to a voluntary Local Noise Mitigation Strategy (LNMS) which will offer noise insulation including secondary or double glazing to residential properties that experience major adverse noise effects from construction activities or project related traffic (Section 8.3 of the WN CoCP – REP2-031). Horizon will provide blackout blinds or alternative mitigation in unforeseen cases of sleep disturbance. The installation of blackout blinds on necessary windows will be offered for relevant properties as part of the process of implementing the Local Noise Mitigation Strategy. There will however be a mechanism for blinds to be installed on affected windows which are not captured by the LNMS. Horizon has increased the potential eligibility for properties under this scheme, and the details of this were submitted at Deadline 3 of the DCO examination [REP3-050]. Horizon has provided further detail into the processes by which properties will be identified and notified of their eligibility under the extended LNMS, as well as the process by which Horizon will implement the strategy [REP3-051].  The Landscape and Habitat Management Strategy (LHMS) submitted with the DCO explains that the project includes landscape mounding and planting to screen or soften views and provide noise attenuation for construction activities from local settlements. Indeed, during construction a mound is proposed to be constructed that mitigates views of the Power Station Construction Area from Cemaes; as well as native woodland planting along the A5025 to help obscure views of the site from Tregele (REP2-039).	Not Agreed	No further action
Construction	Quality of Life	Working Hours	NAP21	Workforce Accommodation Strategy (APP-412)  Wylfa Newydd Code of Construction	The NACP has had longstanding concerns with working hours for the construction workforce and most recently Councillor Roger Dobson submitted a note at Deadline 4 outlining the NACP's position.  The NACP's primary concern is the distinction that it is the workers' right	Horizon takes its duties of care to its workforce very seriously. The shift patterns have been determined having regard to extensive experience of delivering similar projects elsewhere. Horizon's position is explained in more detail in Horizon's response to the NACP's Written Representation [REP3-032].	Not agreed	No further action

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				Practice (REP2-031)	not to work more than 48 hours rather than a right to 'opt out'. Workers can enter into an 'opt out' agreement which must be in writing. Workers have the right to cancel such an agreement.		Red	
Landscape	Cumulative Effect	North Wales Connection	NAP22	ES Volume I - Cumulative effects App I5-1 - Inter-project cumulative effects. (APP-395) ES Volume I - Cumulative effects App I5-2 - Inter-project cumulative noise effects (APP-396)			Not Agreed	No further action. Concerns in relation to the North Wales Connection Project need to be raised with NGET.
Education and Training	Local Employment	Local Opportunities	NAP23	Jobs and Skills Strategy (APP-411)	Hoped that the highest possible proportion of permanent and temporary workers are drawn from the population, working with training providers to identify and offer opportunities to local people to develop the skills to secure employment on site. Investment is required in training from Key Stage 2 (KS2) onwards.  Horizon's position is very much focussed on the training and education for young people but does not provide details on how local adults will be trained, and encouraged to apply, for the jobs available.	Horizon is aiming to maximise opportunities for home-based workers living locally and continues to invest in training and skills on the island.  Horizon is investing locally to encourage and inspire young people in schools and college to take an interest in and study STEM subjects and Horizon has invested in and will continue to invest in the local schools and Colleges to develop the skills and training needs required as a company for the construction and operation phases of the Project.  Since February 2017, Horizon has been promoting and delivering the Primary Outreach Programme, and to date, has already engaged with over 800 primary pupils across Anglesey, Gwynedd and Conwy.  To continue their commitment to investing in local schools and Colleges, there are a number of financial contributions outlined in the draft s.106 agreement which was issued to IACC on 23 January 2019. Please see Schedule 4 for further information relating to Employment and Skills Service and Supply Chain contributions.	Not agreed	No further action

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