

National Infrastructure Planning
Temple Quay House
Temple Quay
Bristol
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For the Attention of Ms Kay Sully

25 March 2019

DCRM Ref. No: WN0902-HZDCO-PAC-REP-00376

Dear Ms Sully

Wylfa Newydd DCO Project: Deadline 8 Matters

1. This letter sets out Horizon Nuclear Power Wylfa Limited's ("Horizon") response to matters allocated to the Applicant for Deadline 8 as outlined in the Rule 8(3) and 13 – Variation to Timetable for the Examination letter published by the Examining Authority ("ExA") on 12 February 2018 ("Rule 8 letter").

Matters contained within Horizon's Deadline 8 submission

2. In accordance with the Rule 8 letter and the additional information requested by the ExA at the Issue Specific Hearings ("ISHs") held on 4 to 8 March 2019 ("March ISHs"), and in the published action points of the aforementioned hearings ("Hearings Actions"), Horizon is submitting the documents listed in Appendix 1 to the ExA for Deadline 8. Further comments in respect of these documents are set out below..

Summary of documents Horizon is submitting at Deadline 8

3. Below is a short summary of the documents that Horizon is submitting at Deadline 8 (as identified in Appendix 1):
 - a. *Response to Hearing Requests for Information:* Following requests for information by the ExA during the ISHs held on 4 to 8 March 2019, and in the published action points of the aforementioned hearings, Horizon is submitting a response document at Deadline 8. For ease, Horizon is submitting a single document that contains Deadline 8 responses to actions raised across all of the March ISHs, 4 to 8 March 2019 inclusive.

b. *Horizon's Deadline 8 Responses to Written Submissions of Oral Case:* Horizon has responded to the written submissions presented at the Open Floor Hearings held on 5 March 2019. This document responds to the submissions received from: Dafydd Griffiths and North Anglesey Councils Partnership; Roger Dobson; Bob Wright; People Against Wylfa B and Dr Jonathan Dean.

Written submissions were also received from Rose Heaney, and Dennis Evans. With regard to Mr Evans' submission, as it was only published on 22 March 2019 Horizon has been unable to include a response as part of its Deadline 8 submissions. Horizon will seek to review Mr Evans' submission and consider any response at a subsequent deadline, if necessary and appropriate. In terms of Ms Heaney's submission, due to its brevity, and the issues raised being addressed elsewhere within Horizon's Deadline 8 submission, Horizon has not included a response within the above document and would instead direct Ms Heaney and the ExA to Horizon's updated Funding Statement, submitted at Deadline 8.

c. *Horizon's Deadline 8 Responses to Stakeholder Deadline 7 submissions:* Horizon has reviewed the Deadline 7 submissions of Interested Parties and has provided a response to those submissions where the issues raised have not already been addressed in previous Deadline responses or as part of the Deadline 8 ExA Actions Responses.

d. *Development Consent Order and Explanatory Memorandum:* Horizon has sought to address the actions identified from the DCO ISH (held on 6 March 2019), as well as matters raised during the other March ISHs. Necessary changes have been incorporated into the DCO (Revision 5.0) and the Explanatory Memorandum (Revision 6.0), where appropriate, and are being submitted at Deadline 8.

A summary of all changes that have been made to the DCO at Deadline 8 is provided in the accompanying Summary Table of DCO Amendments. In order to assist the ExA, Horizon is also submitting an Outstanding Issues Register which outlines the remaining points of contention between Horizon and Interested Parties in respect of the DCO. This register should be read in conjunction with the Summary Table of DCO Amendments and the DCO submitted at Deadline 8.

As noted in that paper, Horizon would like to request that the final DCO is submitted at Deadline 9 (10 April 2019). This will enable Horizon to complete discussions on any outstanding matters with Interested Parties as well as finalise the numbering of the articles and schedules to the DCO.

In addition, Horizon will submit the validation report for the DCO by the end of this week as there remains some minor errors relating to XML that it is trying to rectify in order to get a validation success result.

e. *Final SoCGs and Updated Statement of Commonality:* To reflect positive discussions between Horizon and Interested Parties, since Deadline 7, Horizon is submitting mutually agreed updated SoCGs with the following parties:

- IACC (final);
- Welsh Government (final);

- NRW (final); and
- North Wales Police (draft).

An updated Statement of Commonality is also provided for completeness.

Horizon notes that it was not able to submit mutually agreed SoCGs with North Wales Fire and Rescue Service (NWFRS) or the NDA at Deadline 6. Unfortunately, it has not been possible to develop these documents further since Deadline 6 and therefore the SoCG for these parties remains in the form submitted at Deadline 6. There have, however, been positive ongoing discussions with NWFRS and Horizon will continue to work with all parties to resolve outstanding issues, where possible, prior to the end of the examination.

f. *Compulsory acquisition and land related submissions:* As a result of progress made throughout Examination and following the Compulsory Acquisition ISH on March 2019, a number of the land and compulsory acquisition related documents submitted throughout Examination required updating to bring them in line with the current DCO application and the draft DCO. Horizon therefore submits updated versions to the following documents to reflect the status of things at Deadline 8:

- Statement of Reasons (Revision 3.0);
- Compulsory Acquisition Objections Schedule (Revision 3.0);
- Land Plans and Book of Reference (Revision 5.0);
- Crown Land and Interests s.135 Schedule (Revision 3.0);
- Crown Estate Land plans (Revision 3.0); and
- Statutory Undertakers and Special Category Land s.127, 132 and 138 Schedule (Revision 2.0).

Of particular note, section 9 of the Statement of Reasons has been updated in response to two actions following the compulsory acquisition hearing and to reflect the recent suspension decision. Given the extent of changes, Horizon is submitting both a clean as well as track changed versions of the Statement of Reasons against the Deadline 6 version [REP6-008]. The Statutory Undertakers and Special Category Land s.127, 132 and 138 Schedule has been updated to reflect the last position with respect to protective provisions and to remedy the omissions of Network Rail from the original schedule. The remaining submissions contain relatively minor amendments to reflect progress made by Horizon with affected landowners including changes made to the class interests being sought in respect of certain plots.

g. *Funding Statement:* An updated Funding Statement (Revision 2.0) is being submitted at Deadline 8 to reflect Horizon's recent announcement that it was suspending the Wylfa Newydd DCO Project until satisfactory funding arrangements with the UK Government are agreed. The statement addresses concerns regarding the funding of compulsory acquisition raised at the ISH held on 5 March 2019 and outlined in the published Hearing Actions document.

h. *DCO Drawings:* Following the acceptance by the ExA of Request for Non-Material Changes (RfNMC) No.s 1-5 Horizon is submitting updated drawing packages to reflect the necessary changes as well as addressing issues that came out of the March ISHs

and outlined in the published Hearings Actions documents. The drawing packages affected include:

- Work Plans – All DCO Sites;
- Rights of Way Plans – All DCO Sites;
- Wylfa Newydd Development Area – Power Station Site Plans (Part 1 of 2);
- Wylfa Newydd Development Area – Power Station Site Plans (Part 2 of 2);
- Park and Ride; and
- Logistics Centre.

Horizon notes that the updated drawings for the Park and Ride facility have been amended to reflect the RfNMC No.6 (relating to access arrangements). While this RfNMC is still to be accepted by the ExA, updated drawings have been provided due to the limited time remaining in the Examination. In the event that this change is not accepted, Horizon will provide an updated drawing set for this Work.

- i. *Environmental Statement Addendum and Environmental Statement Addendum Appendices:* Following the acceptance by the ExA of Reason for Non-Material Changes (RfNMC) No.s 1-5 and the submission of RfNMC No.6 Horizon is submitting an updated Environmental Statement Addendum and associated Appendices (Revision 2.0), which supersedes the previously submitted Environmental Statement in its entirety, to reflect the necessary changes as well as addressing issues that came out of the March ISHs and outlined in the published Hearings Actions documents. As noted above, if the RfNMC No.6 is not accepted, Horizon will submit an update of the Addendum.
- j. *Influence of the Wylfa Newydd Project Non-Material Changes on the Shadow HRA:* Following the acceptance by the ExA of Reason for Non-Material Changes (RfNMC) No.s 1-5 and the submission of RfNMC No.6 Horizon is submitting statement on the influence of the non-material changes on the Shadow HRA.
- k. Following requests for information by the ExA during the March ISHs, and in the published action points of the aforementioned hearings, Horizon is submitting updated versions of the following documents to address the issues raised by the ExA and Interested Parties:
 - Design and Access Statement (Volumes 1 to 3) (Revision 4.0);
 - Landscape and Habitat Management Strategy (Parts 1 and 2) (Revision 4.0);
 - Code of Construction Practices and Code of Operational Practice Documents (Revision 4.0);
 - Workforce Management Strategy (Revision 3.0);
 - Water Framework Directive Assessment and Information to Support Article 4(7) Derogation (Revision 3.0);
 - Phasing Strategy (Revision 4.0): Horizon has taken on the comments of key stakeholders and produced a Phasing Strategy that it considers is achievable. Horizon have made a number of changes to the document, including:
 - Clarifying that the Phasing Strategy is only for the delivery of mitigation;
 - Change to Figure 2-1 to illustrate when the key mitigation is expected to be delivered.

- Changes to Table 2-1, which include changes to the key triggers, including for the Site Campus to help with early delivery of the Site Campus.
- Construction Method Statement (Revision 3.0); and
- Illustrative Construction Visuals and Operational Visualisations for Viewpoint 27 and Viewpoint 38 at Felin Gafnan .

DCO s.106 Agreement

4. By way of update, Horizon and IACC are near final agreement on all aspects of the Section 106 Agreement. Accommodation matters have also been agreed with Gwynedd Council, and heritage matters with National Trust. As at Deadline 8, there remain a small number of minor matters outstanding with the Welsh Government, the North Wales Police and the North Wales Fire and Rescue Service. Horizon believes that a final agreement with the majority, if not all, issues resolved between the key stakeholders is likely during the week commencing 25 March 2019. For this reason, Horizon has not submitted the final agreement at deadline but is continuing to engage on these final issues into order to reach a more holistic approval.

Pending receipt of any further comments from the Interested Parties on the amendments made to the agreement, Horizon anticipates that it should be in a position to submit the final agreed DCO section 106 agreement by Deadline 9.

Publication of current Examination Library

5. Given the Examination Library was updated with Deadline 7 references on 22 March 2019, Horizon has been unable to incorporate the latest document references into its Deadline 8 submission. Horizon will provide an updated Guide to the Application at Deadlines 9 and 10 which will incorporate the latest Examination Library references.

Late publication of documents submitted at earlier deadlines

6. Horizon notes that a number of documents which had been submitted at previous deadlines by both Interested Parties and Horizon have only just been published. In particular, Horizon would like to clarify that it had submitted an updated response document to Mr Cominetti following identification that an incorrect response document had been uploaded.
7. Horizon considers that Mr Cominetti's Deadline 7 submission, dated 21 December 2018 but published on 22 March 2019, was made against the incorrect response document and that the corrected version addresses Mr Cominetti's comments.

Additional Submissions - Accepted at the discretion of the Examining Authority (Published 21 March 2019)

8. Horizon notes the significant number of additional submissions (accepted at the discretion of the ExA) that relate to the withdrawal of the National Grid DCO Application.
9. Horizon considers that the withdrawal of the National Grid DCO Application has little bearing on the Wylfa Newydd DCO application and would add that the routing of the cables/lines relating to grid connection are a matter for National Grid and not Horizon..
10. I would be grateful if you could confirm receipt of the enclosures identified in Appendix 1. If we can be of any assistance in that regard, please do not hesitate to contact us on 0800 954 9516.

Kieran Somers

Development Planning Manager Horizon Nuclear Power Wylfa Limited

Appendix 1 – Matters contained within Horizon’s Deadline 8 submission

Document Title	Horizon Reference	Rev
Horizon's Deadline 8 Responses to Actions set in Issue Specific Hearings on 4 - 8 March 2019		
Horizon's Deadline 8 Responses to Actions set in Issue Specific Hearings on 4 - 8 March 2019	WN0902-HZDCO-PAC-REP-00342	1.0
Horizon's Deadline 8 Responses to Written Submissions of Oral Case relating to Open Floor Hearings on 5 March 2019		
Horizon's Deadline 8 Responses to Written Submissions of Oral Case relating to Open Floor Hearings on 5 March 2019	WN0902-HZDCO-PAC-REP-00343	1.0
Horizon's Deadline 8 Responses to Stakeholder Deadline 7 Submissions		
Horizon's Deadline 8 Responses to Stakeholder Deadline 7 Submissions	WN0902-HZDCO-PAC-REP-00372	1.0
Development Consent Order		
Development Consent Order	WN0902-CLC-PAC-REP-00004	5.0
Development Consent Order (Track Change Version - Revision 5.0 against Revision 1.0 APP-029)	WN0902-HZDCO-PAC-REP-00289	1.0
Development Consent Order (Track Change Version - Revision 5.0 against Revision 4.0)	WN0902-HZDCO-PAC-REP-00290	1.0
Summary Table of Amendments to the DCO (Revision 5.0)	WN0902-HZDCO-PAC-REP-00053	5.0
Development Consent Order Outstanding Issues Register	WN0902-HZDCO-PAC-REP-00344	1.0
Explanatory Memorandum		

Explanatory Memorandum	WN0902-CLC-PAC-REP-00005	6.0
Explanatory Memorandum (Track change version - Revision 6.0 against Revision 1.0)	WN0902-HZDCO-PAC-REP-00140	1.0
Explanatory Memorandum (Track change version - Revision 6.0 against Revision 5.0)	WN0902-HZDCO-PAC-REP-00105	1.0
Statements of Common Ground and Statement of Commonality		
Statement of Commonality for Statements of Common Ground Final Statement	WN0902-HZDCO-PAC-REP-00357	4.0
Statement of Common Ground between Horizon Nuclear Power Wylfa Limited and the Isle of Anglesey County Council	WN0902-HZDCO-PAC-REP-00046	3.0
Statement of Common Ground between Horizon Nuclear Power Wylfa Limited and Welsh Government	WN0902-HZDCO-PAC-REP-00007	3.0
Statement of Common Ground between Horizon Nuclear Power Wylfa Limited and Natural Resources Wales	WN0902-HZDCO-PAC-REP-00008	3.0
Statement of Common Ground between Horizon Nuclear Power Wylfa Limited and North Wales Police	WN0902-HZDCO-PAC-REP-00017	3.0
Land		
Compulsory Acquisition Objections Schedule	WN0902-HZDCO-PAC-REP-00050	3.0
Statutory Undertaker and Special Category Land – s.127, 132 and 138 Schedules	WN0902-HZDCO-PAC-REP-00048	2.0
Statement of Reasons	WN0902-CLC-PAC-REP-00003	3.0
Statement of Reasons (Track Change Version - Revision 3.0 against Revision 2.0)	WN0902-CLC-PAC-REP-00003	1.0
Crown Land and Interests s.135 Schedule	WN0902-HZDCO-PAC-REP-00049	3.0
Book of Reference (Part 1 of 3)	WN0902-BRK-PAC-REP-00001	5.0

Book of Reference (Part 2 of 3)	WN0902-BRK-PAC-REP-00001	5.0
Book of Reference (Part 3 of 3)	WN0902-BRK-PAC-REP-00001	5.0
Funding Statement		
Funding Statement	WN0902-HZCON-PAC-REP-00004	2.0
Plans		
Land Plans	N/A	5.0
Work Plans - All DCO Sites	N/A	3.0
Rights of Way Plans – All DCO Sites	N/A	4.0
Crown Estate Land Plans	N/A	3.0
Wylfa Newydd Development Area - Power Station Site Plans (Part 1 of 2)	N/A	4.0
Wylfa Newydd Development Area - Power Station Site Plans (Part 2 of 2)	N/A	4.0
Park and Ride	N/A	4.0
Logistics Centre	N/A	2.0
Environmental Statement Addendum		
Environmental Statement Addendum	WN0902-HZDCO-PAC-REP-00243	2.0
Environmental Statement Addendum - Appendices	WN0902-HZDCO-PAC-REP-00282	2.0
Design and Access Statement		
Design and Access Statement Vol 1: Project-wide	WN0902-QUD-PAC-REP-00004	4.0
Design and Access Statement Vol 2: Power Station Site	WN0902-QUD-PAC-REP-00005	4.0

Design and Access Statement Vol 3: Associated Developments and Off-site Power Station Facilities (Part 1 of 2)	WN0902-QUD-PAC-REP- 00016	4.0
Design and Access Statement Vol 3: Associated Developments and Off-site Power Station Facilities (Part 2 of 2)	WN0902-QUD-PAC-REP- 00016	4.0
Landscape and Habitat Management Strategy		
Landscape and Habitat Management Strategy Part 1 of 2 and Part 2 of 2	WN0902-HZ-PAC-REP- 00008	4.0
CoCPs and CoOP		
Wylfa Newydd Code of Construction Practice	WN0902-JAC-PAC-REP- 00007	4.0
Wylfa Newydd Code of Construction Practice (Track Change Version - Revision 4.0 against Revision 3.0)	WN0902-JAC-PAC-REP- 00104	1.0
Main Power Station Site sub-CoCP	WN0902-JAC-PAC-REP- 00019	4.0
Main Power Station Site sub-CoCP (Track Change Version - Revision 4.0 against Revision 3.0)	WN0902-JAC-PAC-REP- 00105	1.0
Marine Works sub-CoCP	WN0902-JAC-PAC-REP- 00020	4.0
Marine Works sub-CoCP (Track Change Version - Revision 4.0 against Revision 3.0)	WN0902-JAC-PAC-REP- 00106	1.0
Off-site Power Station Facilities sub-CoCP	WN0902-JAC-PAC-REP- 00021	4.0
Off-site Power Station Facilities sub-CoCP (Track Change Version - Revision 4.0 against Revision 3.0)	WN0902-JAC-PAC-REP- 00107	1.0
Park and Ride sub-CoCP	WN0902-JAC-PAC-REP- 00022	4.0
Park and Ride sub-CoCP (Track Change Version - Revision 4.0 against Revision 3.0)	WN0902-JAC-PAC-REP- 00108	1.0

Logistics Centre sub-CoCP	WN0902-JAC-PAC-REP-00023	4.0
Logistics Centre sub-CoCP (Track Change Version - Revision 4.0 against Revision 3.0)	WN0902-JAC-PAC-REP-00109	1.0
A5025 Off-line Highway Improvements sub-CoCP	WN0902-JAC-PAC-REP-00024	4.0
A5025 Off-line Highway Improvements sub-CoCP (Track Change Version - Revision 4.0 against Revision 3.0)	WN0902-HZDCO-PAC-REP-00219	1.0
Wylfa Newydd Code of Operational Practice	WN0902-JAC-PAC-REP-00008	4.0
Wylfa Newydd Code of Operational Practice (Tracked Change Version - Revision 4.0 against Revision 3.0)	WN0902-JAC-PAC-REP-00111	1.0
Workforce Management Strategy		
Workforce Management Strategy	WN0902-HZDCO-PAC-REP-00115	3.0
Workforce Management Strategy (Track Change Version - Revision 3.0 against Revision 2.0)	WN0902-HZDCO-PAC-REP-00294	1.0
Water Framework Directive Assessment and Information to Support Article 4(7) Derogation		
Water Framework Directive Compliance Assessment	WN0902-JAC-PAC-REP-00064	3.0
Water Framework Directive Information to Support Article 4(7) Derogation	WN0902-JAC-PAC-REP-00065	3.0
Phasing Strategy		
Phasing Strategy	WN0902-HZDCO-PAC-REP-00114	4.0
Phasing Strategy (Track Change Version - Revision 4.0 against Revision 3.0)	WN0902-HZDCO-PAC-REP-00293	1.0
Construction Method Statement		
6.4.17 ES Volume D - WNDA Development App D1-1 - Construction Method Statement	WN0902-HZDCO-PAC-REP-00232	3.0

6.4.17 ES Volume D - WNDA Development App D1-1 - Construction Method Statement (Track Change Version - Revision 3.0 against Revision 2.0)	WN0902-HZDCO-PAC-REP-00232	1.0
HRA		
Influence of the Wylfa Newydd Project Non-Material Changes on the Shadow HRA	WN0902-HZDCO-PAC-REP-00358	1.0
Illustrative Construction and Operation Visualisation for Viewpoint 27, and Viewpoint 38 at Felin Gafnan		
Illustrative Construction and Operation Visualisation for Viewpoint 27, and Viewpoint 38 at Felin Gafnan	WN0902-HZDCO-PAC-DRG-00003	1.0
Archaeology Site Summary Reports and Plans		
Archaeology Site Summary Reports and Plans	WN0902-HZDCO-PAC-REP-00359	1.0
Guide to the Application		
Guide to the Application	WN0902-HZCON-PAC-REP-00001_English	9.0
Guide to the Application (Welsh Translation)	WN0902-HZCON-PAC-REP-00001_Welsh	9.0