

# **Wylfa Newydd Project**

## Horizon's Deadline 7 Responses to Actions set in Issue Specific Hearings on 4 - 8 March 2019

PINS Reference Number: EN010007

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14 March 2019

Revision 1.0  
Examination Deadline 7

Planning Act 2008  
Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

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# Contents

1	Horizon Deadline 7 responses to actions set in Issue Specific Hearings 4–8 <sup>th</sup> March 2019 inclusive .....	1
1.1	Introduction .....	1
1.2	Hearing Action responses – ISH 4 <sup>th</sup> March 2019 .....	1
1.3	Hearing Action responses – ISH 5 <sup>th</sup> March 2019 .....	2
1.4	Hearing Action responses – ISH 6 <sup>th</sup> March 2019 .....	2
1.5	Hearing Action responses – ISH 7 <sup>th</sup> March 2019 .....	3
1.6	Hearing Action responses – ISH 8 <sup>th</sup> March 2019 .....	5
1.7	Summary of Deadline 7 responses to actions recorded by Horizon .....	5
	<i>Recorded in 4<sup>th</sup> March 2019 ISH: A response concerns about quantum and procurement of local species for planting.....</i>	5
	<i>Recorded in 4<sup>th</sup> March 2019 ISH: A response to the ExA's request for the colour and materials of the main power station building to be run through an external review process.....</i>	5
	<i>Recorded in 7<sup>th</sup> March 2019 ISH: A response to the ExA's request for confirmation of where independent reviews for the Dalar Hir designs are secured within the DCO.....</i>	5
	<i>Recorded in 7<sup>th</sup> March 2019 ISH: A response to the ExA's request for confirmation as to how revisions to electric vehicle charging points and cycle storage at the Park and Ride are secured in the DCO (or control documents).6</i>	6
	<i>Recorded in 7<sup>th</sup> March 2019 ISH: A response to the ExA's request for an update on the status of negotiations with private landowner in respect of the flooding of Off-line highways. ....</i>	6
	<i>Recorded in 7<sup>th</sup> March 2019 ISH: A response to the ExA's request for confirmation that internal buses from the TWA to the Main Site will not be Euro VI and a justification why this is not necessary. ....</i>	6
	<i>Recorded in 7<sup>th</sup> March 2019 ISH: A response to the ExA's request for consideration as to how "adaptive management" can be reflected in the LHMS and DCO/CoCP to give comfort to NRW and ExA. Consider how "adaptive management" and "long-term management" are defined as ExA queried the meaning of these terms and whether it meant in perpetuity or just lifetime of power station. Defintion needs to be made clear in the relevant control documents. ....</i>	7
	<i>Recorded in 7<sup>th</sup> March 2019 ISH: A response to the ExA's request for clarification on how lighting will be dealt with for construction and operation of each site - i.e. schemes for construction; lighting schemes for operation in accordance with detailed plans. ....</i>	8

# Appendices

- Appendix 1-1 Horizon's Response in relation to Construction Waste Water Treatment Plant Elevations
- Appendix 1-2 Horizon's Written confirmation of ringfenced funding for baseline monitoring
- Appendix 1-3 Horizon's Response on Site Campus Phasing

- Appendix 1-4 Horizon's Response on Historic Environment in relation to Conservation Management Plan
- Appendix 1-5 Horizon's Response on documents relating to Horizon's consideration of alternatives and design evolution as relevant to compulsory acquisition
- Appendix 1-6 Horizon's Response on the amendments of Schedule 14
- Appendix 1-7 Horizon's Response on s106 agreement matters
- Appendix 1-8 Horizon's Response on assistance in understanding and applying for the Local Noise Mitigation Strategy

## List of Tables

Table 1-1	Status of actions recorded on 4 <sup>th</sup> March .....	1
Table 1-2	Status of actions recorded on 5 <sup>th</sup> March .....	2
Table 1-3	Status of actions recorded on 6 <sup>th</sup> March .....	2
Table 1-4	Status of actions recorded on 7 <sup>th</sup> March .....	4

# 1 Horizon Deadline 7 responses to actions set in Issue Specific Hearings 4–8<sup>th</sup> March 2019 inclusive

## 1.1 Introduction

1.1.1 This document contains Horizon Nuclear Power Wylfa Limited's ("Horizon") Deadline 7 responses to actions recorded during the Issue Specific Hearings (ISH) held on 4 – 8<sup>th</sup> March 2019.

## 1.2 Hearing Action responses – ISH 4<sup>th</sup> March 2019

1.2.1 The below table outlines the status of responses to actions recorded by Horizon on 4<sup>th</sup> March 2019.

**Table 1-1 Status of actions recorded on 4<sup>th</sup> March**

Action	Status
Consider and respond to IACC's concerns about quantum and procurement of local species for planting.	Please find Horizon's response in the Summary of Deadline 7 responses in section 1.7 below.
Provide anticipated elevations for the waste water treatment plant - as it scales up (in response to concerns raised about size and design of the treatment plant).	Please find Horizon's response in Appendix 1-1
Written confirmation of baseline monitoring funding being ringfenced (re suspension decision will not affect baseline assessments).	Please find Horizon's response in Appendix 1-2
Consider and respond to council's request for 1,500-2,000 bed spaces at Phase 1 of the Site Campus	Please find Horizon's response in Appendix 1-3
Horizon to consider NRW proposals to amend the design principles requiring that the colour palette of the TWA to mirror that of the Power Station and surrounding WNDA.	Please find Horizon's response in the Summary of Deadline 7 responses in section 1.7 below.
In light of discussion regarding an external design review process and Horizon's proposed new DAS principle regarding the Design	Please find Horizon's response in the Summary of Deadline 7 responses in section 1.7 below.

Action	Status
Commission of Wales, the ExA have asked Horizon to consider whether the colour and materials of the main power station building could/should be run through an external review process.	
Consideration of IACC additional requests in relation to Conservation Management Plan - Driveway (movement of Mound), reinstatement of ground levels of KG and CG, retention of cottage garden;	Please find Horizon's response in Appendix 1-4

### 1.3 Hearing Action responses – ISH 5<sup>th</sup> March 2019

1.3.1 The below table outlines the status of responses to actions recorded by Horizon on 5<sup>th</sup> March 2019.

**Table 1-2 Status of actions recorded on 5<sup>th</sup> March**

Action	Status
Provide the ExA with a list of core documentation relating to "alternatives and design evolution" for the purposes of its assessment under s122 2008 that all alternatives to CA have been considered.	Please find Horizon's response in Appendix 1-5
Clarify in a post hearing note the changes that have been made to schedule 14. Note should identify what changes relate to new plots being included in the schedule, and which changes are simply a consolidation of the schedule.	Please find Horizon's response in Appendix 1-6

### 1.4 Hearing Action responses – ISH 6<sup>th</sup> March 2019

1.4.1 The below table outlines the status of responses to actions recorded by Horizon on 6<sup>th</sup> March 2019.

**Table 1-3 Status of actions recorded on 6<sup>th</sup> March**

Action	Status
Panel expects written responses from all parties at D7 to proposed	Please find Horizon's response within its standalone post-hearing note submitted at Deadline 7.

Action	Status
<p>new articles 83 and art 84. Responses need to include:</p> <ul style="list-style-type: none"> <li>• blight, how might this be dealt with (appreciating that oral submissions were given on Tuesday but reiterate in writing)</li> <li>• consider suggestion whether there should be an independent third-party assessment of financial adequacy re CPO compensation under art 83. Ensure there are no other avenues for CPO compensation than those listed.</li> <li>• Clarify how the guarantee will be secured in event of transfer of benefit i.e. does it need to be secured against land.</li> <li>• Understand implications of new timeframes proposed</li> <li>• Consider tighter wording under art 84(a) and (b) suggested by Panel being: the SoS has approved whatever funding statement that confirms that the authorised development is likely to be undertaken within [time period] and will not be prevented due to difficulties in sourcing and securing the necessary funding.</li> <li>• How will a transferee be bound by any guarantees regarding funding.</li> </ul>	
Post hearing note responding to issues raised by IPs (and ongoing S106 negotiations)	Please find Horizon's response in Appendix 1-7

## 1.5 Hearing Action responses – ISH 7<sup>th</sup> March 2019

1.5.1 The below table outlines the status of responses to actions recorded by Horizon on 7<sup>th</sup> March 2019.

**Table 1-4 Status of actions recorded on 7<sup>th</sup> March**

Action	Status
Confirmation on how Horizon will assist the community in understanding and applying for the LNMS - CIO role etc. Consider if it can be clearer that their role will include assisting on the LNMS queries etc.	Please find Horizon's response in Appendix 1-8
Confirm reference in the DCO application to independent review for DH designs	Please find Horizon's response in the Summary of Deadline 7 responses in section 1.7 below.
Confirm how revisions to electric vehicle and cycle storage at P&R are secured in the DCO (or control documents) and how this will be monitored and increased if required	Please find Horizon's response in the Summary of Deadline 7 responses in section 1.7 below.
Provide details colour and materials of landscaping scheme for Parc Cybi	Please find Horizon's response in the Summary of Deadline 7 responses in section 1.7 below.
Provide an update on the status of negotiations with private landowner in respect of the flooding of Off-line highways to ExA	Please find Horizon's response in the Summary of Deadline 7 responses in section 1.7 below.
Confirm that internal buses from the TWA to the Main Site will not be Euro VI and justification why this is not necessary	Please find Horizon's response in the Summary of Deadline 7 responses in section 1.7 below.
Consider how "adaptive management" can be reflected in the LHMS and DCO/CoCP to give comfort to NRW and ExA. Consider how "adaptive management" and "long-term management" are defined as ExA queried the meaning of these terms and whether it meant in perpetuity or just lifetime of power station. Definition needs to be made clear in the relevant control documents.	Please find Horizon's response in the Summary of Deadline 7 responses in section 1.7 below.

Action	Status
Clarify how lighting will be dealt with for construction and operation of each site - i.e. schemes for construction; lighting schemes for operation in accordance with detailed plans	Please find Horizon's response in the Summary of Deadline 7 responses in section 1.7 below.

## 1.6 Hearing Action responses – ISH 8<sup>th</sup> March 2019

1.6.1 No further actions were identified for Deadline 7 during the ISH held on 8<sup>th</sup> March 2019.

## 1.7 Summary of Deadline 7 responses to actions recorded by Horizon

***Recorded in 4<sup>th</sup> March 2019 ISH: A response concerns about quantum and procurement of local species for planting.***

1.7.1 Horizon is committed to using plants and seeds from local or regional provenance with no invasive non-native species of plant. Horizon is currently engaging on a number of different fronts to help ensure the availability of sufficient Anglesey provenance planting stock and maximise opportunities for associated local community benefits. Horizon is looking to establish collaborative partnerships with local nurseries, woodland managers, environmental contractors, schools and other local community groups. Seed has been collected from a range of woody hedgerow species within the WNDA this autumn/winter 2018/2019. This seed has been sent to commercial nurseries to produce local provenance planting stock suitable for use in the Wylfa Newydd Project. At this stage it is not possible to develop the soft landscape procurement strategy in further detail due to uncertainties over when stock will be required.

***Recorded in 4th March 2019 ISH: A response to the ExA's request for the colour and materials of the main power station building to be run through an external review process.***

1.7.2 As confirmed at the ISH on 4<sup>th</sup> March 2019 Horizon has agreed to the inclusion of an external review process and an updated Design and Access Statement Volume 2 will be submitted at Deadline 8 (25<sup>th</sup> March 2019) to reflect this.

***Recorded in 7th March 2019 ISH: A response to the ExA's request for confirmation of where independent reviews for the Dalar Hir designs are secured within the DCO.***

1.7.3 Horizon is seeking consent for the detailed design of the park and ride as part of its DCO submission. On this design reviews are not considered necessary. DCO Requirement PR3 also requires Horizon to submit detailed designs to

IACC for approval should it elect to not construct the Park and Ride facility in accordance with the approved Detailed Design Drawings.

***Recorded in 7th March 2019 ISH: A response to the ExA's request for confirmation as to how revisions to electric vehicle charging points and cycle storage at the Park and Ride are secured in the DCO (or control documents).***

- 1.7.4 Electrical charging points are secured in the DCO through their inclusion in drawing WN0902-HZDCO-ADV-DRG-00033, for approval, as part of the Park and Ride – Dalar Hir Plans [REP5-089].
- 1.7.5 Cycle storage at the Park and Ride is secured through DCO Requirement PR5 ensuring a total of 25 cycle storage spaces are provided and available during the operation of the Park and Ride facility, unless otherwise approved by IACC.

***Recorded in 7th March 2019 ISH: A response to the ExA's request for an update on the status of negotiations with private landowner in respect of the flooding of Off-line highways.***

- 1.7.6 Horizon has sought to acquire all rights and land in land through private agreement on commercial terms and continues to adopt this approach with this landowner, following a meeting on site with the owner and his representative on the 21 January 2019, a revised proposal was issued to take in to consideration some of the concerns raised in the meeting regarding an existing hedgerow and outfall. We continue to try and resolve the issues but to date have not come to an agreement.

***Recorded in 7th March 2019 ISH: A response to the ExA's request for confirmation that internal buses from the TWA to the Main Site will not be Euro VI and a justification why this is not necessary.***

- 1.7.7 The buses which will provide a shuttle service for construction workers between the Site Campus and the northern security entrance to the power station site construction area will be procured under the same measure as all other buses for the Wylfa Newydd Project as set out in the Wylfa Newydd CoCP [REP5-020] (see paragraph 5.3.7). (i.e. greater weight will be given to suppliers who can better the Euro IV standard in the procurement process). Setting a minimum emissions standard of Euro VI for these buses would not achieve any measurable decrease in pollutant concentrations at the nearest sensitive locations. The nearest residential property or relevant exposure locations are greater than 200m from the nearest point of the haul route on which the Site Campus shuttle buses would be operating on. As noted in chapter B5 [APP-070] of the Environmental Statement (see paragraph 5.4.14), 200m is the distance adopted for the study area for determination of air quality effects from road traffic emissions on the road network and was agreed with the IACC and NRW during consultation. Changes in air quality at receptors

further than 200m is considered to be minimal as concentrations decrease rapidly with distance from the road. The mitigation to reduce emissions of oxides of nitrogen (NOx) at the Wylfa Newydd Development Area has focussed on the larger NOx emitters with much higher potential to cause significant effects, such as the non-road mobile machinery (NRMM) which will number in the several hundred and also the marine vessels during the Marine Works. The mitigation set out in the Main Power Station Site sub-CoCP [REP-022] (see paragraph 7.5.2) is considered to represent best practice for controlling NOx emissions and, for the commitment regarding marine vessel NOx emissions, goes beyond what would be legally required for vessels operating in the Irish Sea.

***Recorded in 7th March 2019 ISH: A response to the ExA's request for consideration as to how "adaptive management" can be reflected in the LHMS and DCO/CoCP to give comfort to NRW and ExA. Consider how "adaptive management" and "long-term management" are defined as ExA queried the meaning of these terms and whether it meant in perpetuity or just lifetime of power station. Definition needs to be made clear in the relevant control documents.***

- 1.7.8 During the ISH Horizon explained how it intends to own the three compensation sites. The long-term management of the sites is secured through the LHMS schemes in Requirement ECS3 in the draft DCO. The management must be implemented and secured for the lifetime of the power station.
- 1.7.9 The specific proposals for each site included in the final compensation proposal are outlined in Tre'r Gof SSSI Compensation Strategy Volume II [REP6-016], and detailed designs will be produced in accordance with principles set out in the Landscape and Habitat Management Strategy [REP5-036 and the Phasing Strategy [REP5-039], and secured through a DCO requirement, Draft Development Consent Order [REP5-003].
- 1.7.10 From collaborative work with NRW in identifying possible compensation sites and from initial soil investigation and hydrology data an approach of exploring the effect of soil stripping in order to create fen land would be tested for its effectiveness over a smaller area of the compensation sites rather than undertaking wholesale soil stripping of the sites as originally envisaged. This would test the effectiveness of the methodology. This agreed approach is documented in the SoCG with NRW [REP6-047] which states the following:

*"It is agreed that there will need to be an adaptive management strategy (paragraph 11.7.2) (an updated version of which was submitted at Deadline 5 (12 February 2019)) focussed on delivering the agreed quantity and quality of compensation, given the uncertainties inherent in habitat creation schemes."*
- 1.7.11 In NRW's Deadline 2 Written Representations [Rep2-325] this is further reiterated:

*"NRW consider that an adaptive management approach based on defined required outcomes, may be a way forward. However, the data is currently*

*insufficient to assess whether the proposed creation of 14ha of fen is likely to be feasible.”*

1.7.12 And goes on to identify the DCO Requirements for the SSSI Compensation sites:

*“DCO Requirement ECS2 states that plans and written details of habitat design will need to be approved by IACC. Sub-paragraph (2) also highlights the details that should be included. DCO Requirement ECS3 states that management schemes relating to management and maintenance of each Ecological Compensation Site will be approved by IACC. ECS4 states that hydrological and hydrogeological monitoring and details of the drainage design will need to be approved by IACC. For these three Requirements, NRW would expect to be consulted in its statutory consultee role. We also consider that the long-term management of the sites (as set out in the agreed ‘management schemes’) should be secured under the section 106 agreement.”*

1.7.13 The DCO Requirements noted above with NRW and IACC as consultee and determining authority for the approval of both the design, management and maintenance and subsequent monitoring methodology should provide suitable comfort to those organisations. Adaptive management is required for the creation of the habitat with long term management needed to ensure its existence is continued. As stated in Horizon's response during the ISH this will be required for the lifetime of the power station rather than into perpetuity.

***Recorded in 7th March 2019 ISH: A response to the ExA's request for clarification on how lighting will be dealt with for construction and operation of each site - i.e. schemes for construction; lighting schemes for operation in accordance with detailed plans.***

1.7.14 Horizon can confirm that construction and operational lighting will be considered through a number of schemes, with the scope and content of these schemes reflected in the relevant CoCP(s) and Schedule 21 of the DCO at Deadline 8:

1. Construction lighting scheme for WNDA;
2. Operational lighting scheme for WNDA;
3. Construction lighting scheme for Offsite Power Station Facilities;
4. Operational lighting scheme for Offsite Power Station Facilities;
5. Lighting scheme for Park and Ride (covering Construction and Operation of the Park and Ride);
6. Lighting scheme for Logistics Centre (covering Construction and Operation of the Logistics Centre); and
7. Construction lighting scheme for A5025 off-line highway improvements (covering Construction of the A5025).

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# Wylfa Newydd Project

## Appendix 1-1 Horizon's Response In Relation to Construction Waste Water Treatment Plant Elevation

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14 March 2019

Revision 1.0

Examination Deadline 7

Planning Act 2008

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

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## Contents

1	Construction Waste Water Treatment Plant Elevations .....	1
1.1	Introduction .....	1
1.2	Waste Water Treatment Plant Dimensions .....	1
1.3	Local Landform Height .....	2

## List of Figures

Figure 1-1	Illustrative layout .....	1
Figure 1-2	Illustrative elevation from south west.....	2
Figure 1-3	Most likely location of the construction waste water treatment plant .....	2

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## 1 Construction Waste Water Treatment Plant Elevations

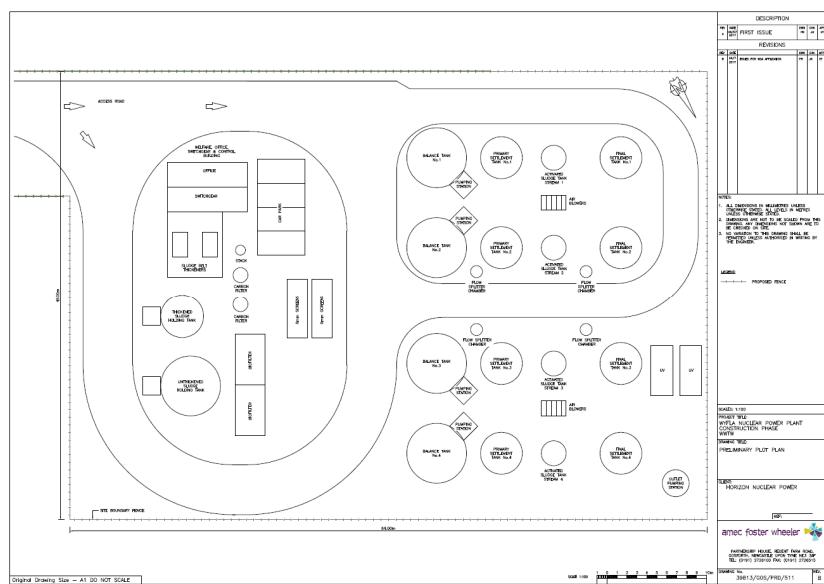
## 1.1 Introduction

- 1.1.1 This document provides a response to questions raised during the DCO Issue Specific Hearing held on 4<sup>th</sup> March 2019, regarding anticipated elevations for the waste water treatment plant.
- 1.1.2 The construction waste water treatment plant will be a dedicated plant to support all construction-derived sewage at the WNDA.
- 1.1.3 A conceptual design was developed to support the environmental permit application. The information presented in this document is taken from the concept design report and is illustrative of the design that would be implemented during construction of Wylfa Newydd.
- 1.1.4 The construction waste water treatment plant is assumed to be located to the south west of Porth-y-Pistyll. Whilst not specifically constrained within the DCO this is the most likely location for it due to the proximity to the proposed outfall and the height with respect to the rest of the construction site.

## 1.2 Waste Water Treatment Plant Dimensions

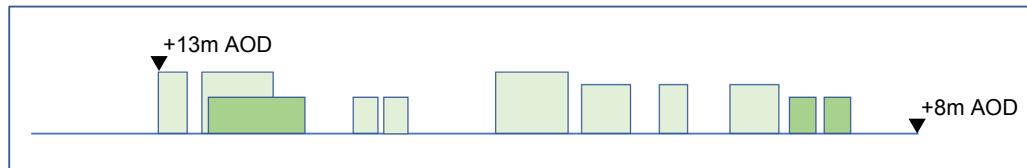
1.2.1 The overall plan dimensions of the waste water treatment plant are 64m x 45m, figure 1-1 provides an illustrative layout.

**Figure 1-1 Illustrative layout**



1.2.2 The maximum height of the plant is 5m. A simple elevation from the south west is shown in Figure 1-2.

**Figure 1-2 Illustrative elevation from south west**

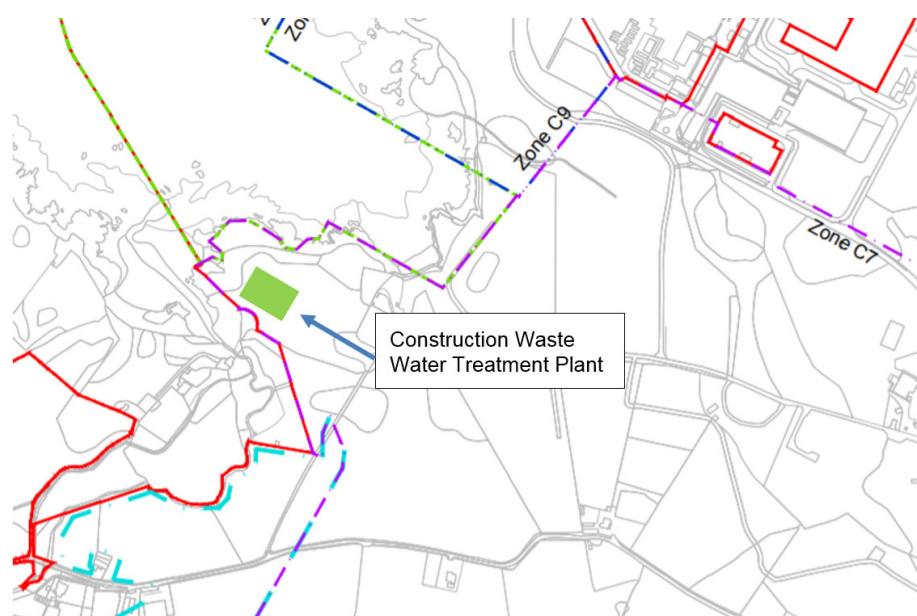


### 1.3 Local Landform Height

1.3.1 The construction waste water treatment plant will most likely be located within construction parameter Zone C7 (Reference WN0902-HZDCO-MSP-DRG-00008, Issue 1.0), see figure 1-3. The construction landform within Zone C7 has a maximum height of 22m (Reference Table WN2B, Draft Development Consent Order [REP5-003]). The maximum construction landform height within the parameter zone is significantly higher than the expected local landform height.

1.3.2 The height of the local construction landform around the construction waste water treatment plant is expected to be between 5m AOD and 8m AOD.

**Figure 1-3 Most likely location of the construction waste water treatment plant**



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# Wylfa Newydd Project

## Appendix 1-2 Horizon's Written Confirmation of Ringfenced Funding For Baseline Monitoring

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14 March 2019

Revision 1.0

Examination Deadline 7

Planning Act 2008

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

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# Contents

1	Horizon's Written confirmation of ringfenced funding for baseline monitoring..	1
1.1	Written confirmation of baseline monitoring funding being ringfenced.....	1

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## **1 Horizon's Written confirmation of ringfenced funding for baseline monitoring**

### **1.1 Written confirmation of baseline monitoring funding being ringfenced**

- 1.1.1 Horizon has undertaken extensive baseline surveys as is evidenced in the DCO submission. During the suspended state, Horizon intends to undertake ongoing survey work of groundwater and surface water monitoring, principally the borehole monitoring for the WNDA and the SSSI Compensation sites. Horizon will also ensure that an appropriate level of technical environmental expert resource is available to advise on baseline data and to advise on what, if any, further survey work is required to maintain the baseline data.
- 1.1.2 During the suspended state, Horizon intends to undertake ongoing survey work of groundwater and surface water monitoring, principally the borehole monitoring for the WNDA and the SSSI Compensation sites. Horizon will also ensure that an appropriate level of technical environmental expert resource is available to advise on baseline data and to advise on what, if any, further survey work is required to maintain the baseline data.

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# Wylfa Newydd Project

## Appendix 1-3 Horizon's Response on Site Campus Phasing

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14 March 2019

Revision 1.0

Examination Deadline 7

Planning Act 2008

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

[This page is intentionally blank]

# Contents

1	Introduction .....	1
1.1	Context .....	1
1.2	Triggers .....	1
1.3	Earliest Delivery.....	2
1.4	Size of Phases.....	3
1.5	Revised Deliver Triggers .....	3

# List of Tables

Table 1-1	Revised Site Campus Delivery Triggers .....	3
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## 1 Introduction

### 1.1 Context

- 1.1.1 At the Issue Specific Hearings on Monday 4 March and Wednesday 6 March 2019 there was further discussion about the timing of delivery of the Site Campus.
- 1.1.2 Three issues were raised:
  1. The triggers for phasing – dates vs impacts;
  2. The earliest that the first phase could be delivered; and
  3. The size of the first and second phase
- 1.1.3 Horizon's position on each is set out below, together with a revised set of triggers for delivery.

### 1.2 Triggers

- 1.2.1 Horizon believes that the triggers for the Site Campus should be linked to the potential environmental effect for which it is being provided as mitigation, ie the number of non-home based (NHB) workers who would otherwise have to seek accommodation in the local area.
- 1.2.2 The Environmental Statement [APP-088] sets out that 2,000 workers (at peak) will be recruited from the local travel to work zone (defined as home based workers), and provides that only 3,000 NHB workers can be accommodated within accommodation in the local community without adverse environmental effects; this means that 4,000 NHB workers need to be accommodated elsewhere (the Site Campus).

#### ***Difficulty of establishing a time-based trigger for delivery of the Site Campus***

- 1.2.3 Horizon does not believe that a time-based trigger which links delivery to fixed dates relative to the commencement of certain DCO works or to project milestones such as First Nuclear Construction (FNC) is practical or possible.
- 1.2.4 Given the uncertainty over the timing of the commencement of DCO works, tying delivery to a fixed date (e.g. January 2022) is also impractical as the Project may not have been implemented in time to achieve that.
- 1.2.5 A time-based trigger would also run the risk of not responding properly to the environmental effect and it is also unnecessary for the reasons set out below.
- 1.2.6 The first phase of the campus is forecast to be delivered in Q4 of Year 4 of the Project (as set out in Figure C1-6 of the ES [APP-088]).
- 1.2.7 Because of the suspension of the Project and the withdrawal of the SPC TCPA planning permission, it is possible that the two phases, (SPC works (under Work No.12 or a subsequent planning permission) and Main Construction), could now overlap, but equally they may not.

- 1.2.8 Given this uncertainty, a time-based approach to triggering Site Campus delivery, for example requiring delivery of the first phase of the campus within the first two years of commencement could mean that it has to be delivered for the end of the SPC works when there will be less than 1,000 workers on-site, most of whom will be home-based (as shown in Figure C1-6 of the ES [APP-088]). Occupancy of the Site Campus, which Horizon must target 85% occupancy of under the draft DCO section 106 agreement [REP6-004], would therefore not be possible.
- 1.2.9 Similarly, a time-based requirement to deliver the campus within (say) four years of commencement may mean it is too late. If there is the opportunity for the SPC Works and Main Construction work to overlap by (say) a year, then the workforce would have already reached the equivalent of Year 5 in the workforce profile set out in Figure C1-6 in the ES [APP-088], ie 6,000 workers with over 4,000 NHB workers.
- 1.2.10 A time-based requirement related to a fixed period relative to commencement will therefore not ensure the necessary mitigation is delivered at the right time.
- 1.2.11 Similarly, a link to something like FNC does not ensure the Site Campus is linked and in place to mitigate accommodation impacts. Although FNC is indicatively scheduled for Q1 of Year 5 of the overall project (as set out in the ES [APP-088]), the workforce required at that point could change if the delivery schedule changes, ie FNC could end up being at an earlier or later point on the workforce profile.
- 1.2.12 As the environmental effect will occur once a certain level of NHB workers are reached, Horizon therefore believes that the best approach is to tie delivery of the Site Campus to the number of NHB workers within the local community.
- 1.2.13 The number of NHB workers will be straightforward for Horizon to monitor and respond to as all NHB workers are required to register with the Workforce Accommodation Management Service (WAMS) and Horizon will report this to the WAMS Oversight Board that is secured through the DCO S106 agreement.

### **1.3 Earliest Delivery**

- 1.3.1 At the Issue Specific Hearing on 6th March 2019, Horizon set out the constraints it faces on the earliest delivery of the Campus.
- 1.3.2 The constraints on delivering the first phase fall into two categories:
  - the design, manufacture, delivery and installation of the modular accommodation units; and,
  - the preparation of the site (including utilities) and delivery of the amenity/welfare block (which is not modular).
- 1.3.3 The minimum timescales for delivery of each Phase 1 of the TWA is estimated at 20 months covering for the procurement, design, manufacture and installation of modular accommodation units. This is a no float construction programme and assumes that the manufacturer has available capacity at the production facility. This cannot be confirmed until the procurement process has been concluded.

- 1.3.4 Groundworks, enabling works and utilities will require undertaken in parallel as will the amenity block construction which will be on a critical path to support the occupation of the first 1500 bed spaces.
- 1.3.5 Following Horizon's submission at Deadline 4 reference [REP 4-007] a further review of the Site Campus build programme has been undertaken enabling Horizon to confirm that the completion date for delivery of Phase 1 (first 1500 bed spaces) can be achieved by Year 4 Q3 of the works as set out in the construction workforce accommodation profile in the ES [APP-088] (Figure C1-6).
- 1.3.6 Horizon's Phasing Strategy [REP5-039] has the Site Campus first phase being delivered before the NHB workforce exceed 2,200, which is also expected to be Y4 (end of Q3/start of Q4) as set out in the ES [APP-088].
- 1.3.7 Further acceleration may be possible if the preparation of the TWA site were to commence in parallel to the SP&C activities. However due to the uncertainty on available funding and an element of delivery risk associated with the restart requirements Horizon believes that the current commitment to deliver 1500 before the trigger level of 2,200 NHB workers and by the indicative schedule period of Y4 (end of Q3/start of Q4) as defined in table 1-1 provides confidence that the workforce accommodation issues are sufficiently mitigated.
- 1.3.8 As set out above, Horizon believes that delivery should be linked to the size of the NHB workforce. That will ensure that adequate mitigation is provided for the impact irrespective of specific timing and imposes a requirement on Horizon to ensure that it is delivered in time.

## 1.4 Size of Phases

- 1.4.1 In response to requests from stakeholders, Horizon has reviewed the size of the first phase to assess whether more units could be delivered in the same timescale, even if the first phase cannot be brought forward.
- 1.4.2 Delivering more accommodation units is constrained by the construction and delivery of those (modular) units. The amenity block is not expected to be a constraint because it is not modular. Delivering an extra 500 bed spaces would add around one month to the delivery schedule so it would still be possible by month 21(equivalent to Year 3 Q4 of the works set out in Figure C1-6 of the ES [APP-088]).
- 1.4.3 Horizon is therefore able to agree to increase the size of the first and second phases of the Site Campus to be 1,500 beds.

## 1.5 Revised Delivery Triggers

- 1.5.1 Horizon is proposing the following revisions to the Site Campus phasing:

**Table 1-1 Revised Site Campus Delivery Triggers**

Phasing	Total number of bedspaces	Trigger (NHB workers)	Other NHB workers
<b>Deadline 5 Phasing</b>			

Phasing	Total number of bedspaces	Trigger (NHB workers)	Other NHB workers
<b>Phase 1</b>	1,000	2,200	1,200 (2,200 minus 1,000)
<b>Phase 2</b>	2,000	4,200	2,200
<b>Phase 3</b>	4,000	6,700	2,700
<b>Revised Deadline 7 Phasing</b>			
<b>Phase 1</b>	1,500	2,200	700 (2,200 minus 1,500)
<b>Phase 2</b>	3,000	4,200	1,200
<b>Phase 3</b>	4,000	6,700	2,700

1.5.2 These revisions will be included within the updated Phasing Strategy to be submitted at Deadline 8.



# Wylfa Newydd Project

## Appendix 1-4 Horizon's Response on Historic Environment in Relation to Conservation Management Plan

PINS Reference Number: EN010007

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14 March 2019

Revision 1.0

Examination Deadline 7

Planning Act 2008

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

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# Contents

1	Historic Environment.....	1
	<i>Issue 1.....</i>	1
	<i>Issue 2.....</i>	3
	<i>Issue 3.....</i>	3

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## 1 Historic Environment

1.1.1 Horizon understands that the key issues with regards to IACC comments at the Issue Specific Hearing (ISH) on 4 March 2019 raised under agenda item 5. (c) (i) Historic environment impacts individually and in combination: Grade II Cestyll Registered Park and Garden are:

- Issue 1: The removal of the driveway to the site of Cestyll House (Asset 132) and the kitchen garden and the movement of mound to avoid impacts on the driveway.
- Issue 2: The reinstatement of ground levels between the kitchen garden and the valley garden.
- Issue 3: The retention of the gardener's cottage.

### ***Issue 1***

1.1.2 At the ISH on 4 March 2019 under agenda item 5. (c) (i) IACC expressed their concern relating to the removal of the trackway that marks the route of the former driveway to the site of Cestyll House (Asset 132) and the kitchen garden.

1.1.3 The removal of the trackway that marks the route of the former driveway to the site of Cestyll House (demolished in 1991) and the kitchen garden, is required for the construction of the Power Station.

1.1.4 Measures to mitigate effects on Cestyll Garden (HLT 2) are set out in chapter D11 [APP-130] and include a level 2 historic landscape survey to create a permanent documentary record (written, drawn and photographic) of its current form. This will include the trackway that marks the route of the former driveway. This will be specified in the Archaeological Mitigation Scheme secured through Requirement WN1 of the DCO.

1.1.5 As detailed in the Draft DCO s.106 (Schedule 11) [REP1-010] Horizon will prepare a Conservation Management Plan (CMP) for Cestyll Garden (Cestyll Garden Management Plan) which will cover both valley garden and kitchen garden. As identified below this will provide for public access to location of the demarcation of the former site of the kitchen garden which may (subject always to site safety and security requirements) include managed and unmanaged access options but which shall at a minimum include managed access requirements.

1.1.6 The CMP is proposed to provide for the following; however it is noted that this is under active negotiation.

<b>6 Cestyll Garden Management Plan</b>	
6.1	Prior to commencement of works within 10 metres of the Valley Garden and Kitchen Garden the Developer will prepare a management plan for Cestyll Garden (" <b>Cestyll Garden Management Plan</b> ") which shall (subject to paragraph 7) cover both the Valley Garden and Kitchen Garden (unless otherwise agreed in writing between the Developer and IACC).
6.2	In addition to the mitigation identified and secured in the Main Power Station Site sub-COCP and further developed by the Archaeological Mitigation Scheme for the WNDA, the Cestyll Garden Management Plan shall:
6.2.1	In respect of the Valley Garden (and subject always to paragraph 7): <ul style="list-style-type: none"><li>(a) set out required restoration works for Valley Garden;</li><li>(b) identify additional interpretation in the form of installation of interpretation boards;</li><li>(c) establish a programme of maintenance for valley garden for the duration of the construction period to the end of the Operational Period; and</li><li>(d) require and establish improvements to public access of valley garden where this shall be provided at a sustainable level and shall not require additional infrastructure to be provided or requiring modification the gardens to be DDA compliant.</li></ul>
6.2.2	In respect of the Kitchen Garden the Cestyll Garden Management Plan shall: <ul style="list-style-type: none"><li>(a) identify the location for the demarcation of the former site of the kitchen garden. Where possible, such demarcation should be to be as close as possible to the original location of the former kitchen garden and similar in size provided always that such location must be informed by site safety and security considerations;</li><li>(b) to the extent possible based on site safety and security requirements the walls used for the demarcation of the former site of the kitchen garden shall be of the height of the original walls of the kitchen garden and constructed in a style in keeping with the original kitchen garden. This may result in the location of the demarcation of the former site of the kitchen garden being further from the original location of the former kitchen garden to recognise site safety and security considerations.</li></ul>

- (c) Provide for public access to location of the demarcation of the former site of the kitchen garden which may (subject always to site safety and security requirements) include managed and unmanaged access options but which shall at a minimum include managed access requirements.
- (d) Identify opportunities for landscaping and planting within the location of the demarcation of the former site of the kitchen garden and for the area of land between location of the demarcation of the former site of the kitchen garden and the Valley Garden to reflect the connectivity of the former kitchen garden to valley garden.
- (e) Provide for interpretation and information boards about the former kitchen garden to be erected.
- (f) Confirm that items (a) to (e) shall not be required to be delivered until the end of the Construction Period.

6.3 Nothing shall prevent paragraphs [6.2.1] and [6.2.2] from being discharged separately;

6.4 The Developer will provide the Cestyll Garden Management Plan to IACC and Cadw for comment for not less than 20 working days and shall take those comment into account in producing a final Cestyll Garden Management Plan, which shall thereafter be shared with IACC and Cadw.

6.5 The Developer shall thereafter implement and comply with the Cestyll Garden Management Plan for the Construction Period and Operational Period.

## Issue 2

- 1.1.7 At the ISH on 4 March 2019 under agenda item 5. (c) (i) IACC requested further information regarding the reinstatement of ground levels between the kitchen garden and the valley garden.
- 1.1.8 The detail proposed on this is addressed via the CMP proposals referred to above in the s.106 agreement.

## Issue 3

- 1.1.9 At the ISH on 4 March 2019 under agenda item 5. (c) (i) IACC asked whether the site of the Gardener's Cottage could be retained.
- 1.1.10 Gardener's Cottage (Asset 134) would be removed. The removal of this historic building is required for the construction of the Power Station. An assessment of the effect of the removal of the Gardener's Cottage was

presented in appendix D11-6 (Effects on heritage assets) [APP-213]. After mitigation the significance of residual effect was assessed to be negligible adverse.

- 1.1.11 This building has been partially demolished. Prior to its partial demolition, as identified in appendix D11-6 (Effects on heritage assets) [APP-213], a Level 3 historic building survey recording was undertaken, and comments have been received from Gwynedd Archaeological Planning Service on the draft report.
- 1.1.12 Provision has also been made for interpretation, and for information boards about the former kitchen garden to be erected. They could include information such as historic mapping and aerial photography identifying the location of historic elements of the garden, such as the Gardener's Cottage. This will be specifically added to the proposed text of the s.106 agreement as referred to above.

# **Wylfa Newydd Project**

## **Appendix 1-5 Horizon's Response on Documents Relating to Horizon's Consideration of Alternatives and Design Evolution as Relevant to Compulsory Acquisition**

PINS Reference Number: EN010007

---

14 March 2019

Revision 1.0

Examination Deadline 7

Planning Act 2008

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

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# Contents

1	Horizon's Response on Documents Relating to Horizon's Consideration of Alternatives and Design Evolution as Relevant to Compulsory Acquisition	1
1.1	Introduction.....	1
1.2	Summary of legal requirements and Guidance .....	1
1.3	Documents relevant to Horizon's consideration of alternatives .....	1
1.4	Conclusion.....	3

## List of Tables

Table 1 - Documents relevant to Horizon's consideration under section 122 of the Planning Act 2008

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# **1 Horizon's Response on Documents Relating to Horizon's Consideration of Alternatives and Design Evolution as Relevant to Compulsory Acquisition**

## **1.1 Introduction**

1.1.1 At the Issue Specific Hearing on Compulsory Acquisition on 5 March 2019, the Examining Authority asked Horizon to provide a list of the core documentation relating to Horizon's consideration of alternatives and design evolution as relevant to compulsory acquisition.

## **1.2 Summary of legal requirements and Guidance**

1.2.1 Under the Planning Act 2008, a DCO can only include provisions for the compulsory acquisition of land where the land (section 122(2) of the Act):

- (a) is required for the development to which the development consent relates;
- (b) is required to facilitate or is incidental to that development; or
- (c) is replacement land which is to be given in exchange for the order land under section 131 or 132 (open spaces, common land etc.);

and there must also be a compelling case in the public interest for the land to be acquired compulsorily (section 122(3) of the Act).

1.2.2 In addition to the requirements under the Act, the Department for Communities and Local Government Guidance, Planning Act 2008: Guidance Related to Procedures for Compulsory Acquisition (updated 2013) ('Guidance') provides further factors, including that the applicant should be able to demonstrate to the satisfaction of the Secretary of State that all reasonable alternatives to compulsory acquisition (including modifications to the scheme) have been explored.

1.2.3 Section 9.5 of the Statement of Reasons (the latest version of which was submitted at Deadline 6 (19 February 2019)) [REP6-008] sets out how Horizon has met the requirement to consider alternatives as set out in the Guidance.

## **1.3 Documents relevant to Horizon's consideration of alternatives**

1.3.1 A list of the core documentation relating to Horizon's consideration of alternatives and design evolution as relevant to compulsory acquisition are set out in Table 1 below.

**Table 1 - Documents relevant to Horizon's consideration under section 122 of the Planning Act 2008**

Document	Reference
<b>Site Selection Report</b>	
Horizon has carried out a site selection exercise for the various components of the Wylfa Newydd DCO Project. The alternatives considered for the siting of the constituent parts of the WNDA are explained, together with the rationale for the choices made in volume 2 of the Site Selection Report. The extent to which alternative sites have been considered for each of the Associated Development sites and Off-Site Power Station Facilities is set out in the relevant volumes 3 to 7 of the Site Selection Report	
Volume 1 – Introduction and Context	APP-436
Volume 2 – Wylfa Newydd Development Area	APP-437
Volume 3 – Off-Site Power Station Facilities	APP-438
Volume 4 – Temporary Workers' Accommodation	APP-439
Volume 5 – Park and Ride	APP-440
Volume 6 – Logistics Centre	APP-441
Volume 7 – A5025 Off-Line Highways Improvements	APP-442
<b>Environmental Statement – Alternatives and design evolution chapters</b>	
As required by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009, these chapters provide an outline of the main alternatives studied by Horizon, together with an indication of the main reasons for Horizon's choice, taking into account the environmental effects.	
The chapters also outline the site selection process and design evolution for the each of the component sites in the Wylfa Newydd DCO Project, and describes how design considerations, consultation responses and environmental constraints have influenced the decision-making process.	
Chapter D2 - WNDA Development Alternatives and design evolution	APP-121
Chapter E2 - Off-Site Power Station Facilities - Alternatives and design evolution	APP-240
Chapter F2 - Park and Ride - Alternatives and design evolution	APP-267
Chapter G2 - A5025 Off-line Highway Improvements - Alternatives and design evolution	APP-305
Chapter H2 - Logistics Centre - Alternatives and design evolution	APP-356
<b>Consultation Report</b>	
The Consultation Report sets out what happened during the statutory and non-statutory pre-application consultation processes. It seeks to "tell the story" of how the	

Document	Reference
Wylfa Newydd Project evolved through the consultation stages. It documents how feedback from consultees has influenced the options and choices that led to the submitted DCO application.	
Consultation Report	APP-037
<b>Design and Access Statement</b>	
Volume 1 sets the overarching context for the consultation and project review process, and an overview of the key strategic changes to the Wylfa Newydd DCO Project where they specifically relate to matters of design and access. Volumes 2 and 3 of the DAS provide a fuller review of consultation and design evolution for each element of the Wylfa Newydd DCO Project.	
Volume 1 – Project-wide	REP4-016
Volume 2 – Power Station Site	REP4-017
Volume 3 – Associated Developments and Off-site Power Station Facilities	Part 1: REP4-017 Part 2: REP4-017

## 1.4 Conclusion

1.4.1 As set out in the Statement of Reasons, the requirement of the Guidance set that all reasonable alternatives to compulsory acquisition (including modifications to the project) have been explored has been met by Horizon in respect of the Wylfa Newydd DCO Project.

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# Wylfa Newydd Project

## Appendix 1-6 Horizon's Response on the Amendments of Schedule 14

PINS Reference Number: EN010007

---

14 March 2019

Revision 1.0

Examination Deadline 7

Planning Act 2008

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

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# Contents

1	Introduction .....	1
1.1	Purpose of this post-hearing note .....	1
	<i>Schedule 14 of the draft Order</i> .....	1
	<i>Amendments made to Schedule 14 at Deadline 5</i> .....	1

## List of Tables

Table 1-1	Plots classified as Class 5 added to Schedule 14 at Deadline 5 .....	2
-----------	--	---

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## 1 Introduction

### 1.1 Purpose of this post-hearing note

1.1.1 This post-hearing note clarifies the amendments that Horizon made to Schedule 14 of the draft Development Consent Order [REP5-003] at Deadline 5 (12 February 2019), as shown in the draft Development Consent Order Revision 4.0 against Revision 3.0 [REP5-005].

#### ***Schedule 14 of the draft Order***

1.1.2 Schedule 14 of the draft Order identifies land that Horizon intends to temporarily possess for the purposes of constructing the authorised development pursuant to articles 35 and 36 of the draft Order and as shown on the Land Plans [REP6-021].

1.1.3 Schedule 14 also makes clear the purpose for which such temporary possession may be taken.

#### ***Amendments made to Schedule 14 at Deadline 5***

1.1.4 Initially, Schedule 14 included only that land that Horizon had classified as Class 3 in the Book of Reference [REP6-011, REP6-012 and REP6-013] and Land Plans, being land, except in relation to public highways, over which Horizon was seeking the power to enter on and take temporary possession of.

1.1.5 It has since been recognised that Schedule 14 should include all land including public highways, over which Horizon is seeking the power to enter on and take temporary possession of. This is land that Horizon has classified as either Class 3 or Class 5 in the Book of Reference and Land Plans.

1.1.6 The amendments made to Schedule 14 at Deadline 5 (12 February 2019) were to, therefore, add to Schedule 14 those plots of land being public highway that Horizon is seeking a Class 5 interest in respect of, as set out in the Book of Reference.

1.1.7 A complete list of the plots classified Class 5 that were added to Schedule 14 at Deadline 5 (12 February 2019) is provided at Table 1-1.

1.1.8 In light of the additions to Schedule 14, a decision was also taken to consolidate the schedule. Instead of listing each plot separately, the plots were grouped together according to the purpose for which temporary possession of that land was sought. This is the reason some of the amendments are showing as deletions. No plots were removed from Schedule 14.

1.1.9 Horizon continues to review the land related schedules of the draft Order to ensure they reflect the latest position regarding the compulsory acquisition of land as set out in the Book of Reference. As such, further amendments may still be required to Schedule 14; however, in accordance with the Examination timetable, a final Book of Reference and final draft Order will be submitted at Deadline 8 (25 March 2019).

**Table 1-1 Plots classified as Class 5 added to Schedule 14 at Deadline 5**

Relevant site	Plot reference (as shown on the Land Plans)
Wylfa Neywdd Development Area	52, 53, 54, 55, 56, 143, 148, 170, 171, 172, 173
Parc Cybi Logistics Centre	202, 206, 208, 214
Dalar Hir Park and Ride	300, 301, 302, 304, 305, 306, 307, 308, 309, 311, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 328
A5025 Off-Line Highway Improvements (Section 1 - Valley)	400, 401, 402, 403, 404, 413, 414, 415, 416, 417, 418, 437, 438, 439, 440, 441, 442, 443
A5025 Off-Line Highway Improvements (Section 3 - Llanfachraeth)	501, 502, 507, 508, 533, 534, 535, 536, 537, 538, 544, 545, 546, 547, 548, 549, 563, 564, 565, 570, 571, 572, 573
A5025 Off-Line Highway Improvements (Section 5 - Llanfaethlu)	604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 630, 631, 632, 633, 635, 636, 637, 653, 656, 657, 660, 661, 662, 663, 677, 678, 679, 680, 682
A5025 Off-Line Highway Improvements (Section 7 - Cefn Coch)	700, 711, 713, 725, 726, 728, 729, 740, 741

# **Wylfa Newydd Project**

## Appendix 1-7 Horizon's Response on s.106 Agreement Matters

PINS Reference Number: EN010007

---

14 March 2019

Revision 1.0

Examination Deadline 7

Planning Act 2008

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

[This page is intentionally blank]

# Contents

1	Horizon's Response on s.106 agreement matters .....	1
1.1	General Update .....	1
1.2	S.106 Agreement Schedule 4 - Jobs and Skills (Post 16) Contribution .....	1
1.3	S.106 Agreement Schedule 5 – Accommodation .....	2
	<i>Summary of position</i> .....	2
	<i>Quantum</i> .....	3
	<i>Allocation</i> .....	4
1.4	Response to NWWT .....	4
1.5	Response to NRW .....	4
1.6	Response to North Wales Fire and Rescue Service .....	5
	<i>Additional comment of NWFRS position and calculations</i> .....	6
	<i>Horizon proposed NWFRS contribution</i> .....	7
1.7	Response to North Wales Police .....	8
	<i>Scope of response</i> .....	8
	<i>Model and costing for police resource</i> .....	8
	<i>Explanation of the Current Position and differences</i> .....	9
	<i>Police Contribution Report / Deed of Covenant</i> .....	11
	<i>Ceasing construction</i> .....	11
	<i>Delay in construction programme</i> .....	12
	<i>Monitoring data</i> .....	12
	<i>Revised Impact Assessment</i> .....	12
	<i>Contingency Fund</i> .....	12
	<i>Role in approving plans</i> .....	13
	<i>Community Safety Management Scheme</i> .....	14
	<i>Emergency Services Engagement Group (ESEG) – other matters raised</i> .....	14
	<i>Temporary Police Facility</i> .....	14
1.8	Response to NACP: Copper Trail and public rights of way .....	15

# Appendices

Appendix 1-1 NWP approval of Plans

# List of Tables

Table 1-1 NWP involvement in review and approval of plans .....

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## **1 Horizon's Response on s.106 agreement matters**

### **1.1 General Update**

- 1.1.1 Significant progress has been made on drafting the s.106 agreement with extensive meeting and drafting sessions occurring between IACC, WG, Horizon and their advisors.
- 1.1.2 Further meetings have been held with IACC, Welsh Government and Gwynedd on 11 and 12 March.
- 1.1.3 By way of very brief overview on agreed matters:
  - The front end is largely agreed save as regards a matters in clause 7 on the deed of covenant to be entered into with third parties. Some definitions will also need finalising.
  - Security/financial standing matters will be dealt with proposed via the DCO instead of the s.106 agreement.
  - The quantum is agreed with IACC and there is agreement as to the principle of most matters, albeit there is drafting to be finalised in a number of the schedules.

### **1.2 S.106 Agreement Schedule 4 - Jobs and Skills (Post 16) Contribution**

- 1.2.1 It is noted that the proposed allocation of the (previously named) Jobs and Skills Contribution has moved already during negotiations from that recorded in the Deadline 6 (19 February 2019) submission of the s.106 agreement [REP6-004] so that the current allocation proposed by Horizon and agreed with IACC is:
  - a Jobs and Skills (Post-16 Training) Contribution of £7,000,000; and
  - a Jobs and Skills (Economic Inactivity) Contribution of £3,000,000.
- 1.2.2 In addition, a £2,000,000 contingency fund is provided. Should KPIs not be met, the Jobs and Skills Engagement Group will prepare a Jobs Action Plan which may authorise release of that contingency.
- 1.2.3 The Welsh Government has stated that its view is that the current £7,000,000 contribution allocated for post-16 training, towards achieving the 2000 home based workers target, is insufficient.
- 1.2.4 The Welsh Government's position assumes that all 2,000 home-based workers will leave behind vacancies that need training in order to be filled and that Horizon should pay for it. That is an incorrect premise, which if followed would create a disproportionate and unreasonable burden on Horizon.

- 1.2.5 Firstly, some workers will not need to change jobs – they will already be working for contractors who work on the project. There will therefore be no vacancy that needs backfilling.
- 1.2.6 Secondly, where vacancies do arise, there is no evidence that further training will be needed or that it is the responsibility of Horizon to pay for it. Horizon has already committed in the s106 agreement to separate additional funding for workforce planning in the social care sectors, and for the fire services.
- 1.2.7 Horizon has already set out the flaws in the Hardisty Jones report (see Appendix B to [REP2-367] in its Deadline 3 (18 December 2018) response to that document [REP3-034], most particularly that it uses the wrong measure of unemployment when assessing labour market capacity. The position in REP3-034 are not repeated in full here. However, Horizon understands that the majority of the Welsh Government's request is for Level 3 and 4 construction and engineering training at a cost of £16,000 per person and £16m in total.
- 1.2.8 Horizon believes that measures to expand the labour force and for upskilling should be the priority. Expanding the labour force by bringing economically inactive people back into it will also mean it is able to cope with the fact that although the assessment is of 2,000 home based workers at peak, there will be higher levels of churn. The £10 million overall Jobs and Skills contribution has been costed to deliver sufficient training and programmes to enable the 2000 home based worker target to be reached and has been benchmarked against government costings of schemes. Supplementing this to add resilience is a 20% contingency fund of £2 million. In addition Horizon notes that the s.106 agreement also contains further obligations on Horizon to target:
  - an average of 2.3% of the on-site construction Workforce (taken as proportion of both manual and non-manual workforce on-site) for the Wylfa Newydd DCO Project to be employed as apprentices on formal apprentice frameworks or standards
  - 20% of the site-based operational workforce being graduates from the apprenticeship scheme.
- 1.2.9 Overall, Horizon's position remains that the £12 million jobs and skills payments are robust contributions which are more than capable of ensuring that there will be 2000 home-based workers (at peak). Further, given that it is the policy of Welsh Government and IACC to create more jobs on Anglesey, there is no case for seeking to the planning system to impose an obligation on the applicant to fix wider labour market issues.

## 1.3 S.106 Agreement Schedule 5 – Accommodation

### *Summary of position*

1.3.2 The Welsh Government and Gwynedd Council each raised two points at the March Hearings as regards the accommodation mitigation funding in the s.106 agreement, on:

- the quantum of the Worker Accommodation Capacity Enhancement Contribution and the Accommodation Contingency Fund; and
- the allocation of the Worker Accommodation Capacity Enhancement Contribution as between IACC and Gwynedd Council.

1.3.3 It is noted that the Deadline 6 (19 February 2019) version of the s.106 Agreement provides for:

- A £13,500,000 Worker Accommodation Capacity Enhancement Contribution allocated:
  - 95% (£12,825,000) to IACC.
  - 4% (£540,000) to Gwynedd; and
  - 1% (£135,000) to Conwy.
- An Accommodation Contingency Fund which is released where either certain triggers are reached or on advisement of the WAMS oversight Board. It can be released to IACC, Gwynedd or Conwy.

1.3.4 Horizon's position is that it is agreed that the accommodation funding should be targeted:

- firstly in proactive rather than reactive manner (hence the reduction in the contingency fund and corresponding increase in the capacity enhancement fund); and
- secondly targeted primarily to Anglesey and specifically the north of Anglesey where there is the least existing available supply and therefore where accommodation pressure is likely to be the highest.

1.3.5 However it is agreed that further discussion is required with all parties to further discuss the allocation; a revised position of a 90%/10% split has already been proposed by IACC to Gwynedd and the Welsh Government. This is under active discussion.

### ***Quantum***

1.3.6 Horizon's position remains that the capacity enhancement contribution is robust and allows for the delivery of appropriate additional bed-spaces.

1.3.7 The Welsh Government stated that the Housing Fund needs to provide 1,875 bed spaces. That misunderstands the basis of the agreement which provides for an indicative expenditure of the capacity enhancement contribution, as agreed with IACC, on the indicative split between interventions and the unit cost of those interventions. Horizon believes that the cost of these interventions is reasonable and that the 1,875 could therefore be achieved. It therefore demonstrates one way it could be spent in order to deliver 1,875 bed spaces.

1.3.8 The agreement provides for development of a plan in order to guide specific expenditure and auditing of housing delivery which will be used to track housing delivering. If key KPIs are not being met, the contingency fund can be released in order to ensure numbers are met.

### ***Allocation***

1.3.9 The allocation needs to relate both to the level of demand and the level of supply. The Menai Mainland is expected to accommodate around 25% of workers. However, it has around 50% of the total accommodation in the Key Study Area (see Tables C1-11 and C1-12 of ES Vol. C1 [APP-088]). Impacts on accommodation are therefore less likely to occur than they are on Anglesey, where Horizon's ES has identified a shortfall of supply compared to estimated demand in North Anglesey.

1.3.10 While Horizon therefore agrees with targeting more of the capacity enhancement contribution to Anglesey to ensure that demand is planned for and delivered before issues arise, it is agreed that there will be further discussion between IACC, Welsh Government and Gwynedd on the exact split of the contribution.

## **1.4 Response to NWWT**

1.4.1 In response to NWWT's comments regarding the Tern Warden Payment, Horizon confirms that this payment will be indexed. The reference to indexing has been removed throughout the agreement and is dealt with in an upfront clause.

1.4.2 As regards the payment it is noted that it is made upfront to NWWT. Clearly it will be incumbent on NWWT to budget the use of the payment appropriately including in the early years and later years where there are significantly less workers and therefore for which there is no need for additional tern wardening.

## **1.5 Response to NRW**

1.5.1 Horizon confirms that inclusion of a AONB and Heritage Coast contribution has been agreed in principle. In addition, it is proposed to combine the two voluntary environmental funds into this wider ranging contribution which also has the effect of making these a committed element of the s.106.

1.5.2 Drafting on this is being developed and will be shared with NRW during the week commencing 11 March 2019.

1.5.3 NRW suggested that Horizon's submission of the Stage 3 (Assessment of Alternative Solutions) [REP5-044], Stage 4 (IROPI) [REP5-045] and the Compensation Report [REP5-046] indicated Horizon was reaching agreement that the tern compensation sites were needed.

1.5.4 That is not the case. Those reports were provided solely in response to the Examine Authority FWQ.2.5.11. Horizon does not agree that there will be adverse effects on the integrity of the Anglesey Terns SPA. The reports

submitted are themselves clear that they have been prepared on a precautionary basis.

- 1.5.5 If the Report on the Implications for European Sites (REIS) is due to be issued by the Examine Authority on 27 March 2019 does indicate that compensation sites are required, Horizon will provide a suitably worded requirement for inclusion in the DCO by Deadline 9 (10 April 2019). It is noted that there has been support from all landowners with whom Horizon has been in discussion with over potential tern compensation site and Horizon is confident that suitable sites can be secured.
- 1.5.6 A meeting will be held with NRW during the week commencing 11 March 2019.

## 1.6 Response to North Wales Fire and Rescue Service

- 1.6.1 NWFRS on 21 February provided Horizon with its "Wylfa Newydd Fire & Rescue Mitigation Business Case v1.0". This document has not been submitted into the examination; it seeks a £18.3 million request for funding.
- 1.6.2 From its end, since (and indeed prior to) the issue of the Deadline 3 (18 December 2018) version of the Draft s.106 agreement [REP3-042], Horizon has costed proposals and estimates and has committed to a contribution of £1,000,000.
- 1.6.3 The differences in the contribution appear to largely reflect that:
  - the NWFRS proposal takes no account of mitigation which Horizon is providing on site or the phasing of the Project (i.e. a build-up and then decline of workers). The scope of onsite fire services is appended to schedule 9 of the Deadline 6 (19 February 2019) version of the Draft DCO s.106 agreement [REP6-059]. Among other things the onsite service will include the following services which obviate the need for the level of resource sought by NWFRS:
    - **Construction site:** 24-hour coverage/ 7 days per week
      - Emergency vehicles for first response including all-terrain vehicle for remote areas of site
      - Ability to search smoke filled buildings for casualties using Breathing Apparatus
      - Pumps and hoses to control major fires and limit spread using site fire hydrants when available otherwise drawing water from ponds and/ or water bowsers/tankers (operated by others)
      - Specialist rescue services e.g. for work at height, confined spaces, machinery or vehicle events
      - Support to site medical team for casualty recovery, stabilisation and transport to site clinic
    - **Construction Temp workers camp** (24-hour coverage 7 days per week, Fire Watch may be based at the camp on call 11pm to 7am)
      - Emergency vehicles for first response

- Ability to search multi-storey accommodation buildings for casualties using Breathing Apparatus
- Pumps and hoses to control major fires and limit spread using site fire hydrants
- Support to site medical team for casualty recovery, stabilisation and transport to camp medical facility
- the NWFRS sums largely relate to the funding of a whole-time duty system capability to be located at an existing NWFRS station and associated funding for 28 staff. Horizon does not consider the funding sought is justified, evidenced not commensurate with how fire services are managed at other large sites .

### **Additional comment of NWFRS position and calculations**

1.6.4 The NWFRS has costed:

- Operational response (£11.7m)
- Business Fire Safety & Community Safety (£0.35m)
- Project Management (£1.0m)
- Capital requirement (facilities/vehicles/IT) (1.0m)
- Overheads (£4.1m)

1.6.5 The document provided by NWFRS provides no justification for this other than that it is based on 'professional judgement'. The overheads and facilities requested (at circa £4m and £400k) would largely be related to the cost of this 27/7 operational response at Amlwch.

1.6.6 Horizon would expect NWFRS to provide a response to incidents where necessary at the main site (after first response from the on site crew) and at the associated sites, but consider there is no justification for the 24/7 resource at Amlwch, given:

1.6.7 Horizon are providing on site fire and rescue capability. Horizon has shared and discussed the details of the Scope of Service with NWFRS during SoCG discussions;

1.6.8 This level of resource would not be consistent with the way NWFRS operate elsewhere. For example:

- There is no permanent (24/7) NWFRS fire station in Holyhead to support the 1500 workers at RAF Valley. This includes several hundred single person accommodation rooms in various blocks. RAF Valley has its own in house fire service to mitigate this risk and provides specialist aviation cover.
- Holyhead has a population of circa 14,000 people, the ferry runs every few hours 24/7 with several thousand movements of vehicles; however, NWFRS only have day cover and retained duty system at night;

- Bangor has only a Retained Duty System crew at night; despite the University having some 10,000 students. However, NWFRS does not have 24/7 coverage for a city with a population of circa 19,000. There are circa 3,000 student rooms in the campus accommodation blocks.

1.6.9 The Horizon offer to NWFRS (see below) recognises that it is appropriate to provide funding for Business Fire Safety and Community Safety as well as Workforce Planning and staff time during the construction period, and additional training and heavy lifting equipment.

### **Horizon proposed NWFRS contribution**

1.6.10 The Horizon offer to NWFRS in the s.106 agreement is £1,000,000, based on meetings with NWFRS, and is budgeted to cover:

- Business Fire Safety (including signing off accommodation fire safety certification).
- Community Safety (supporting the Wylfa Newydd DCO Project in the Fire Prevention and Education programme).
- Additional training and heavy lifting equipment for deployment at road traffic accidents;
- Workforce planning; and
- Staffing time and costs required to physically review the Site and liaise with the Developer in respect of the construction build for the duration of the Construction Period

1.6.11 While Horizon has not sought to restrict via the s.106 agreement exactly how monies could be spent, this was calculated at:

- A full time liaison officer at circa £400,000 over the construction period.
- An allowance for workforce planning at £50,000 (which is consistent with workforce planning contributions to other stakeholders).
- Training in the use of and hydraulic heavy lifting equipment of £200,000
- Contingency of £350,000 which could be used to fund additional officer time.

1.6.12 It was made clear that NWFRS do not think this is an appropriate allocation of expenditure. While Horizon has had a large number of meetings with NWFRS (see table 2-1 of the SOCG [REP6-034]), Horizon will to continue to work with NWFRS to define an appropriate sets of principles of expenditure of the proposed contribution. It is noted however that:

- those principles must actually be included within the s.106 agreement to provide clarity and assurance to Horizon, IACC, NWFRS and the Secretary of State as to how the contribution must be spent to provide mitigation. A contribution paid with no parameters would not be compliant with the CIL Regulations or EN-1.

- The contribution must otherwise meet the CIL Regulations/EN-1 tests in that it must be necessary, relevant to planning, relevant to the development to be consented, enforceable, precise, and reasonable in all other respects. In order to satisfy this, any contribution must take into account the scope of services provided by Horizon on site.

## 1.7 Response to North Wales Police

### ***Scope of response***

1.7.2 This response responds to both the matters raised in the 6 March 2019 issue specific hearing (the model and costing for police resource) and the matters set out in the materials provided by the North Wales Police (NWP) to the Examining Authority on Friday 1 March (the "NWP Paper").

1.7.3 Save in respect of the police contribution which is dealt with first below, the remainder of the response follows the unresolved matters set out in the table in the NWP Paper.

### ***Model and costing for police resource***

1.7.4 In summary, the position (and changes from the Deadline 6 position) is as follows:

- Deadline 6 (19 February 2019):
  - Horizon model and resourcing: £6,170,242 for policing services, and provision of space for the NWP within a Horizon building on the WNDA.
  - NWP model and resourcing: £29,298,000 for policing services and an additional £683,000 for a new temporary police facility
- Current position:
  - Horizon model and resourcing:
    - a modelled contribution of £8,447,044 for policing services, but where a mechanism is included for either increased or decreased amounts based on the actual numbers of the non-home based worker (where a base sum is always paid with a reconciliation the following year) and provision for extended payment for the duration of the Construction Period (whatever that may be) against based on the numbers of the non-home based workers.
    - provision of space for the NWP within a building on the WNDA.
  - NWP model and resourcing: £11,226,406 for policing services, and provision of space (at a minimum specification) for the NWP within a building on the WNDA.

1.7.5 As such the funding difference between Horizon and NWP has reduced from £23,810,758 to £2,779,362.

### ***Explanation of the Current Position and differences***

1.7.6 Following a meeting between North Wales Police (NWP) and Horizon it was agreed that the following resource model would be adopted to deal with the potential impact on NWP during the development of Wylfa Newydd.

1.7.7 The resource model would be based around the concept of a neighbourhood policing model, which is well established, and effective community based model. NWP have ten Safer Neighbourhoods teams dedicated to improving the quality of life within local communities by working with partners to tackle the issues that matter most to local team.

1.7.8 Horizon has agreed to fund a sergeant and between two and ten constables, depending upon the scale of the workforce, as a dedicated community team for the area. This preventative approach will provide the most effective policing for the local community and integrate into existing structures. The numbers of police resources to be funded by Horizon is agreed as set out below; however the costs of that resourcing are not agreed.

### **Resources**

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
Sergeant	1	1	1	1	1	1	1	1	1	1
Constables	2	4	7	9	10	10	7	4	2	2
PCSO	0	0	0	0	0	0	0	0	0	0
Operational Planning	1	1	1	1	1	1	1	1	1	1
Detective/Intelligence	1	1	2	2	2	2	2	2	2	1
Roads Policing	2	2	2	2	2	2	2	2	2	2
<b>Total</b>	<b>7</b>	<b>9</b>	<b>13</b>	<b>15</b>	<b>16</b>	<b>16</b>	<b>13</b>	<b>10</b>	<b>8</b>	<b>7</b>
Total Workers	500	500	2000	5000	6000	7500	9000	8500	6200	2500
									<b>10 yr total:</b>	<b>114</b>

### **Roads Policing Unit**

1.7.9 A total of two constables will be employed in the roads policing unit to deal with the additional demand placed upon the road network on the Isle of Anglesey, the surrounding areas of Gwynedd and the A55 corridor. This is a reduction in the number of posts originally proposed by NWP but this is because there is the opportunity for officers posted to the enhanced community team to provide support to the Roads Policing Teams.

### **Crime Services**

1.7.10 Additional detective posts will also be made available to deal with a potential increase in intelligence, investigation and safeguarding issues. This will vary between one and two posts.

## **Operational Planning**

1.7.11 A dedicated post has been made available to deal with the increased demand placed on NWP during the development.

## **Charging for Police Services**

1.7.12 Whilst Horizon and NWP are in agreement in relation to the proposed structure and posts, further discussions will be held as to the costing model proposed by NWP, which is not agreed as appropriate by Horizon.

1.7.13 The majority of police funding is provided centrally and through locally tax-funded services. There are some functions that police officers perform that are provided beyond their ordinary public duty. Where this takes place, in some cases, there is the opportunity for the Police & Crime Commissioner (PCC) to recover costs under legislation and the provisions of "Special Police Services". To provide consistency across police forces the National Police Chiefs Council provide guidelines on charges, although some variability may be justified.

1.7.14 Charges can be applied at different levels, which will vary according to the circumstances:

- Employable Cost: This represents the basic actual cost of the service providers, including on-costs but with no allowance for the recovery of overheads;
- Direct Cost: This is the cost of an officer including a standard overtime recovery element;
- Operational Resource Cost: This represents the cost of the resource employed in the provision of the service. Here, the direct costs and the direct overheads are included;
- Full Economic Cost: This calculation includes all properly attributable costs, including contributions to administrative and general overheads

1.7.15 As Horizon are providing a base for the local policing team and the general level of the charges suggested by NWP further discussion needs to take place. NWP wish to apply a full economic cost recovery model which incorporates an accommodation cost. This would mean that Horizon would be potentially be double charged and this cost needs to be isolated and removed from the costing model.

1.7.16 National Policing Guidelines on Charging for Police Services is usually only used for agreements that fall under:

- Sec 25 Police Act 1996 – Special Policing Services Act 1996
- Sec 26 Police Act 1996 - Provision of advice and assistance to international organisations
- Sec 92 Police Act 1996 – Grants by local authorities
- Sec 93 Police Act 1996 – Acceptance of gifts and loans

1.7.17 In this case the money will be transferred to NWP via s106 agreement (to IACC) then to NWP via Deed of Covenant and as such it falls outside of the guidance. Within the full economic cost recovery model there is a charge that is applied for police officers:

- Sergeant - £16,077 pa\*
- Constable £13,077 pa\*

(\*based upon the 2018 charging guidelines)

1.7.18 The NWP charging proposals include a significant overtime charge. When the overtime charge is applied under the guideline it makes assumption that the officer roles will also need to be back filled as they are being abstracted. This increases costs significantly.

1.7.19 Horizon's position is that NWP are significantly overestimating the overtime costs within the costings model they have suggested be adopted. The charging model NWP have used is not appropriate in this case as it makes an assumption that the police posts will be back filled as they are being abstracted, which adds a premium of 30% to the overtime cost. In this case NWP will be funded the actual post and there will never be a need for the post to be back filled, which means that no premium is necessary or appropriate. It is agreed that an overtime allowance should be allowed for each post but this should reflect a median payment for police officers, which would be approximately £3,000 instead of the proposed sums sought by NWP, being £13,006 for a PC and £16,077 for a PS. This will be further discussed with NWP.

### ***Police Contribution Report / Deed of Covenant***

1.7.20 Respecting IACC and the Welsh Government's views, Horizon has agreed that with revised wording in place in clause 7 (Deed of Covenant) of the s.106 agreement, it will not be a party to the deed of covenant. NWP advised the Examining Authority that it is meeting with IACC on the wording of the Deed of Covenant on 15 March.

1.7.21 Horizon will separately consider further reporting obligations to be specified in the s.106 agreement itself.

1.7.22 NWP has also verbally raised issues with clause 7.5. The purpose of clause 7.5 was to provide for alternative delivery of mitigation in the event that a third party has not signed a Deed of Covenant.

1.7.23 Horizon will continue to work with IACC and others to agree revised wording to reflect that the police services are not able to be delivered in an alternative manner in the same way as other mitigations.

### ***Ceasing construction***

1.7.24 Following discussion with IACC the parties to the s.106 agreement have agreed to include a new clause regarding ceasing construction.

### ***Delay in construction programme***

- 1.7.25 As set out in 3.2.1(c)(i), a delay/extension to the construction programme has been provided for in the revised s.106 agreement under discussion.
- 1.7.26 Horizon considers that the number of non homebased workers on the site is the correct and robust determiner for calculating the payment per annum for each construction year of delay.
- 1.7.27 An updated resource table reflecting the agreed model is appended to this note.

### ***Monitoring data***

- 1.7.28 Horizon has amended the s.106 agreement to provide the relevant WAMS data which gives the location of the workforces' accommodation to the Emergency Services Engagement Group.
- 1.7.29 Registration with the worker accommodation portal is not required, as while the Workforce is not required to select accommodation through the portal, the Workforce is required to register with the WAMS (Schedule 5, paragraph 1.2).
- 1.7.30 Horizon has agreed that it will release raw traffic data to the NWP, however it is proposed that the NWP identify (from time to time) what junctions it is interested in given the substantial quantum of data which will be generated.

### ***Revised Impact Assessment***

- 1.7.31 A reassessment provision in addition to the in-built mechanism referred to above is not required. The environmental statement (ES) has been undertaken on a worst case basis and mitigation developed for all topic areas – not just the police - respectively.
- 1.7.32 The impacts for the police are linked to worker numbers (which is the determiner of worker traffic) and HGV traffic movements – which are capped. Further there are extensive traffic controls and contingency measures in place for traffic which apply for the construction period.
- 1.7.33 Both traffic and worker numbers are the subject of many other controls and cannot be materially exceeded without a non material or material change to the DCO being sought (which would trigger consultation obligations). Horizon does not agree that there are any factors affecting the police circumstance that would occur such that a full reassessment is necessitated.

### ***Contingency Fund***

- 1.7.34 The police funding is robust without further contingency funding. Contingency funds have been provided for where the modelled numbers may be exceeded (for example the number of workforce dependents which affects the Welsh Language immersion funding and education funding) or the geographical location of the effects (for example where the workforce lives which affects the accommodation funding). Health contingency is provided where the number

of referrals cannot be fully predicted, and jobs and skills where upskilling KPIs are not being met.

- 1.7.35 Contingency in respect of the impacts for policing are now built in de facto through the revised formula referred to above which confirm that the police funding flexes where worker numbers are higher (or lower) and modelled or the duration of the construction period is longer.
- 1.7.36 In respect of contingency for protests and demonstrations, as Horizon has noted it will be contracting its own protest management contractors. It is not agreed that it should bear the costs of police resourcing for protest or demonstrations. It is already funding significant policing resource – it is simply not correct to characterise those funded resources (which are notionally allocated purely to manage the effects of the DCO project) as unable to deal with a protest without creating an unacceptable impact on police servicing elsewhere. Further it is noted that in the Hinkley Point C examination, the Examining Authority's report specifically stated that the applicant should not have to bear the costs of policing protests and demonstrations.
- 1.7.37 NWP has said that additional funding may be required for example for a collision by an HGV or AILS. This is not agreed as a matter for which it is appropriate that Horizon bears an additional cost. It is part of the core policing function which should not be recharged to horizon. By way of analogy, Stena Line or any other developers using the A55 are not charged if one of their HGVs is involved in a road traffic accident. Additionally Horizon is funding two FTE road policing resources.

### ***Role in approving plans***

- 1.7.38 The DCO requires NWP to be consulted in respect of the development of identified schemes, and where identified documents are changed or amended.
- 1.7.39 In addition, the DCO at Schedule 19, paragraph 1(3) provides wide ranging rights for the relevant discharging authority to consult any statutory consultee that it considers relevant and this could and would include NWP where appropriate.
- 1.7.40 The NWP have sought a further approval stage , which would occur prior to the consultation referred to in 3.19.1 above. That is proposed to require Horizon to spend 21 days seeking NWP's approval over 'principles' (yet to be identified by NWP) over certain plans (also yet to be identified by NWP). If no agreement was reached, Horizon would move to the consultation stage.
- 1.7.41 It is not agreed this further approval stage is required given the consultation required by schedule 21 of the DCO. This adds considerable additional time to the approval stage of each document which is not justified nor necessary given the other stages at which can NWP input into the plans and schemes.
- 1.7.42 Further Horizon emphasises that if NWP has comments on the principles of control documents or schemes such as the Community Safety Management Scheme, AIL Management Scheme or the Traffic Incident Management Scheme, those should be provided now as the principles of those schemes

are contained within the CoCP (Code of Construction Practise) and will not be renegotiated in the future.

1.7.43 Annex 1 below includes further specific comments on how NWP is currently involved in the plans over which it is seeking further control.

### ***Community Safety Management Scheme***

1.7.44 In respect of the NWP's comment that the NWFRS should be a party consulted with in the development of the Community Safety Management Scheme (CSMS), this is agreed by Horizon and DCO schedule 21 will be amended.

### ***Emergency Services Engagement Group (ESEG) – other matters raised***

1.7.45 NWP suggested that the ESEG should not include representatives of Horizon, IACC or the Welsh Government. Horizon disagrees and considers that all parties will play a valuable role in providing a holistic oversight of the development. Both Horizon and IACC have clear roles in delivering safeguarding outcomes including:

- As set out in the Wylfa Newydd CoCP para 3.4.9.
- The safeguarding role of the Council in terms of the interface of safeguarding with education, accommodation and the Community involvement officers.

1.7.46 Neither Horizon nor IACC have an issue with the Welsh Government also being represented on the ESEG.

1.7.47 In respect of the statement made by NWP that it must be consulted in respect of safeguarding matters, this is already provided for. As stated above the NWP are key consultees in developing the CSMS. The key role of the CSMS is set out in the Wylfa Newydd CoCP which was submitted into examination at Deadline 5 (12 February 2019); if the NWP want further matters to be considered for inclusion in the CSMS it is again requested that those are provided now – as the CSMS will be produced in accordance with the Wylfa Newydd COCP.

1.7.48 In respect of the suggestion that there should be an independent chair, this is not agreed as necessary. The predecessor Welsh Language and Culture Engagement Group has been operating for a number of years with an independent chair however that is not the case nor has been requested to be the case for any of the other engagement groups. It is not clear what role or function an independent chair would have. Unlike other groups, the ESEG does not allocate monies; its role is to shape key plans.

### ***Temporary Police Facility***

1.7.49 Horizon committed to provision of operating space within the WNDA alongside the site's security team.

1.7.50 NWP has requested that there needs to be a minimum specification and size associated with this. That can be further discussed, and NWP is requested to

provide the detail it would like to see. But at this stage Horizon is not aware of why this could not be achieved provided it remains with the parameters and allows Horizon's security team to operate effectively.

## **1.8 Response to NACP: Copper Trail and public rights of way**

- 1.8.1 A meeting is scheduled with Mr Griffiths to discuss matters he has raised on the Cooper Trail, and consider whether any amendments to the proposed route can be delivered.
- 1.8.2 In terms of mitigation quanta for public rights of way (PRoW), the core contributions in the s.106 agreement are in Schedule 3 and comprise:
  - £300,000 (indexed) for maintenance and capital costs to PRoW in the vicinity of the sites
  - £300,000 (indexed) for maintenance and capital costs for the Wales Coast Path
  - £75,000 (indexed) for Copper Trail contributions
- 1.8.3 In addition, there is:
  - An Annual Transport Contribution (£100,000 annually for the duration of the Construction Period and thus anticipated to be a total of £900,000). IACC may (but is not required to) use that contribution for matters including walking and cycling improvements to routes near or adjacent to the A5025. This is in addition to the funds available in Schedule 3.
  - Funding for a full time transport officer (£40,000 annually for the duration of the Construction Period and thus anticipated to be a total of £360,000).
  - A road safety campaign contribution of £50,000.
  - Additional mitigation funding for IACC and Welsh Government totalling £1,300,000 which may be spent on additional mitigation matters as recommended by the Transport engagement Group which could include walking and cycling improvements.
- 1.8.4 The above demonstrates that contributions of £3,285,000 are available focussed on PROW and other transport mitigations and improvements.
- 1.8.5 While it is not particularly helpful to compare PRoW and transport mitigations with other projects given the different circumstances in each case, it is noted that this is commensurate with the £3.2 million fund referenced by Mr Griffiths as funded in Hinkley Point C.

## Appendix 1-1 NWP approval of Plans

### 1-1.1 Comments on NWP role in respect of specific plans

1-1.1.1 In the Deadline 5 (12 February 2019) version of the DCO Horizon identified NWP as a consultee on a number of plans. However, even where NWP is not specifically identified, IACC has wide powers to consult with any party it considers appropriate in the discharge of the requirement.

1-1.1.2 In summary:

- Consultee rights have been given in respect of the TIMP, AIL, CSMS (under requirement) and WMS
- NWP has also been listed as a consultee where the WMS, CSMS, TIMP or AIL scheme is sought to be amended by Horizon through the tailpiece.

1-1.1.3 In respect of the plans noted by NWP, further responses (in addition to those already provided) are set out in table 1-1 below in italics.

**Table 1-1 NWP involvement in review and approval of plans**

Plan	Definition
CSMS	<p>NWP have been given consultation rights in respect of the final CSMS under the DCO (PW7) (as well as having a role in its approval as part of the CoCP). Further, the s.106 agreement provides ESEG input into the development of this plan</p> <p><i>Horizon does not consider that the additional approval rights in the form sought by NWP would, in practice, add anything to the development of this document.</i></p> <p><i>Horizon will add NWFRS to the DCO as a consultee as requested by NWP</i></p>
TIMP	<p>In the Deadline 5 (12 February 2019) DCO, Horizon included a new requirement to prepare a Traffic Incident Management Scheme (PW7) and submit to IACC for approval, in consultation with NWP and others. We note that this was not provided for in earlier drafts as NWP told HNP that it didn't need to produce one. Further, the s.106 agreement provides ESEG input into the development of this plan</p> <p><i>Horizon does not consider that the additional approval rights in the form sought by NWP would, in practice, add anything to the development of this document.</i></p>
WMS	<p>NWP need to provide comments on the WMS now – rather than seeking approval rights over the CoC (Code of Conduct). The WMS is the control over workers. The CoC will be a high-level document reflecting the WMS but is not for sign off.</p> <p>The draft DCO s.106 agreement at Deadline 5 (12 February 2019) [REP5-008] was amended to:</p>

Plan	Definition
	<ul style="list-style-type: none"> <li>• require Horizon to comply with the WMS in addition to providing CoCs in accordance with that document.</li> <li>• provide that if Horizon needs to change the WMS principles, it must seek approval of IACC who must consult with NWP</li> <li>• <b>See response to FWQ.2.4.17</b></li> </ul> <p><i>The Code of Conduct will not be a certified document. It will not be produced until prior to commencement and will simply reflect the WMS – it is not part of the WMS.</i></p> <p><i>- Horizon can provide NWP with any revised CoC</i></p>
CoCPs/sub-CoCPs	<p>As approved documents, these need to be commented on NOW. Horizon has worked hard with stakeholders to agree the detail and where detail has not been agreed, Horizon has offered schemes for approval (relevant to NWP are the TIMP, AIL and CSMS – which it has consultee rights (or in the case of CSMS approval and consultee rights)).</p> <p>If Horizon seeks to change these CoCPs through the tailpiece provisions, then it must seek approval from IACC and the changes cannot be outside the scope of the ES.</p> <p>IACC may consult anyone it chooses (this was made clear in Schedule 19 of the Deadline 5 (12 February 2019) DCO) and in any event they cannot approve material changes</p> <p><i>Horizon will consider any detailed points made by the NWP received in time to be considered in line with the timetable</i></p> <p><i>Horizon does not consider that the additional change of control rights in the form sought by NWP would, in practice, add anything to the development of this document.</i></p>
WAS	<p>This is not a control document. The obligations from the WAS have been translated into legal commitments in the s.106 agreement and are largely agreed with IACC.</p> <p><i>Reference to the WAS in schedule 5 of the s.106 agreement will be removed.</i></p>
Health Wellbeing Strategy and	<p>There is no Health and Wellbeing Strategy. The Health and Wellbeing controls are translated into legal commitments in the s.106 agreement and are agreed with BCUHB.</p> <p><i>Horizon has provided a revised financial contribution to fund an IACC safeguarding officer. A liaison role with the police for that officer could be agreed provided IACC are comfortable with that.</i></p>
Operational Travel Strategy	<p>Transport experts have advised that there is sufficient detail/controls within the CoOP (Code of Operational Practice) to deal with transport matters. For this reason a separate strategy/scheme is not being provided by Horizon as the CoOP will control traffic.</p> <p>NWP should comment on these controls now if it has comments. If Horizon sought to change the CoOP, then it would need to seek IACC's</p>

Plan	Definition
	<p>approval who could consult NWP if appropriate.</p> <p><i>NWP needs to provide specific feedback on what matters it considers need more detail. Horizon will consider any detailed points made by the NWP received in time to be considered in line with the timetable. The practical effect of this being in the COCP or in a separate document is not relevant and NWP is requested to focus on the substance rather than the form if it would like changes.</i></p>
MOLF operational strategy	<p>There is no “operational strategy” per se; MOLF security will be licensed through Department for Transport and linked to the Marine Safety Case. Further controls are managed through the bylaws and Horizon’s role as the Harbour Authority. A61 of the DCO provides the list of matters which the byelaws will cover (including loading and unloading of vessels, entering onto vessels, directing vessels within the harbour etc. In addition, Horizon has a requirement that it must put 60% of materials through the MOLF during construction (to ensure that deliveries by road are as limited as possible).</p> <p><i>As detailed to NWP in meetings there will be no MOLF operational strategy. This will be controlled in accordance with the regimes referred to above.</i></p>
AIL Management Plan	<p>In the Deadline 5 (12 February 2019) DCO, Horizon included a new requirement to prepare a AIL Management Scheme (PW7) and submit to IACC for approval, in consultation with NWP and others</p>
Protest Mgmt scheme	<p>In the Deadline 5 (12 February 2019) DCO, Horizon included a new requirement to prepare a Protest Management Scheme (WN1) and submit to IACC for approval, in consultation with NWP</p>

## Wylfa Newydd Project

### Appendix 1-8 Horizon's Response on Assistance in Understanding and Applying For The Local Noise Mitigation Strategy

PINS Reference Number: EN010007

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14 March 2019

Revision 1.0

Examination Deadline 7

Planning Act 2008

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

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# Contents

1	Question .....	1
2	Response.....	2
2.1	Notification .....	2
2.2	Assistance .....	2
2.3	No response .....	2
2.4	Dispute resolution.....	3

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## 1 Question

- 1.1.1 Horizon is committed to providing a Local Noise Mitigation Strategy (LNMS) which offers a noise insulation package of measures to eligible properties within LNMS boundary areas for the Wylfa Newydd Development Area (as shown in figure 8-1 of the Wylfa Newydd Code of Construction Practice [REP5-020]) and along certain road transport routes, including the parts of the A5025, as identified in figure 8-2 of the Wylfa Newydd Code of Construction Practice [REP5-020]. The noise insulation package contains measures to improve noise insulation in eligible rooms of eligible buildings. The aim of the strategy is to improve noise insulation for qualifying windows and doors whilst ensuring adequate ventilation. Enhanced measures may be offered on a case-by-case basis, where there is a need and scope to provide additional noise insulation for conservatories and/or gardens.
- 1.1.2 During the Issue Specific Hearing into the on proposed Off-site Power Station Facilities site and Associated Development Sites which took place on Thursday 7th March 2019, the Examining Authority asked Horizon's witness for noise and vibration (Mr Sam Williams) how Horizon will assist the community in understanding and applying for the LNMS?

## 2 Response

### 2.1 Notification

- 2.1.1 At paragraph 8.3.18 of the Wylfa Newydd Code of Construction Practice (WN CoCP) [REP5-020], Horizon has committed to notifying the owners or occupiers of potentially eligible buildings which meet the acoustic and building type criteria that they may be eligible to receive LNMS mitigation measures.
- 2.1.2 Initial notifications will be made in writing. As set out in paragraph 3.2.14 of the WN CoCP [REP5-020] all notifications will be bilingual in Welsh and English, and accompanied with a contact name, telephone number and address to which enquiries should be directed.
- 2.1.3 Horizon will raise awareness of the LNMS and the role of the notification letters. A first step in this process which has already been undertaken is the publication of the Local Noise Mitigation Strategy (Companion Guide) [REP3-051] which is an explanatory guide to the LNMS, and which sets out practical aspects of its implementation in non-technical language.
- 2.1.4 Horizon will also use the Community Liaison Groups (CLG) and Community Liaison Officers (CIO) to raise awareness of the LNMS. The CLGs will include local residents from the immediate local communities, who will raise awareness of the LNMS in the wider community. The CIOs will provide information packs to residents and together with the GLGs will provide a conduit for the dissemination of information to, and input from, local residents.

### 2.2 Assistance

- 2.2.1 In addition to the CLGs, in section 3.3 of the WN CoCP [REP5-020] Horizon has committed to establish a dedicated and free telephone hotline to be available for anyone with concerns about the construction programme or Wylfa Newydd DCO Project. It will deal with enquiries or complaints from the public, including questions about the LNMS.
- 2.2.2 The system will be staffed by bilingual personnel. The system will be widely advertised by appropriate means, particularly on construction site boundaries across the Wylfa Newydd DCO Project. The system will be held to set response times and key performance indicators to enable the efficiency or effectiveness of the helpline to be monitored or measured.

### 2.3 No response

- 2.3.1 In the case that no response is received from the owner or occupier of a potentially eligible dwelling, Horizon will apply all reasonable endeavours to contact the party, including a combination of CLG engagement, personal visits to the property by Horizon's Community Involvement Officers, and bilingual follow-up letters.

## **2.4 Dispute resolution**

2.4.1 Horizon and its contractors will engage positively with those affected by noise, to and resolve issues or questions about the LNMS. However, in the event of a dispute arising which cannot be easily resolved between Horizon and the affected owner or occupier, Horizon will consider the use of a suitably qualified and experienced independent third party to review the situation and recommend the course of action to be taken.

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