



Meeting note

File reference	EN010007
Status	Final
Author	Karl-Jonas Johansson
Date	3 May 2017
Meeting with	Horizon Nuclear Power
Venue	Temple Quay House
Attendees	The Planning Inspectorate Chris White (Infrastructure Planning Lead) Kay Sully (Case Manager) Karl-Jonas Johansson (Case Officer) Hannah Pratt (Senior EIA and Land Rights Advisor) Richard Kent (Senior EIA and Land Rights Advisor) Horizon Nuclear Power David Palmer (Horizon DCO Manager) Maria Kolodnytska (Horizon Engineering Project Manager) Andrew Prior (Horizon Legal Lead) Shirley Henderson (Horizon EIA Lead) Nigel Howorth (Partner at Clifford Chance)
Meeting objectives	To discuss the Wylfa Newydd Nuclear Power Station projects approach to the Rochdale envelope.
Circulation	All attendees

Summary of key points discussed and advice given:

Introduction

The Applicant and the Planning Inspectorate (the Inspectorate) case team introduced themselves and their respective roles. The Inspectorate continued by outlining its openness policy and ensured those present understood that any issues discussed and advice given would be recorded and placed on the Inspectorate's website under s51 of the Planning Act 2008 (PA2008). Further to this, it was made clear that any advice given did not constitute legal advice upon which the Applicant (or others) can rely.

Commercial need for flexibility

The Applicant set out its reasoning for why it needed flexibility in the draft Development Consent Order (DCO) which included reducing the potential need for non-material change applications post-consent for minor amendments brought on by design changes post-consent. The Inspectorate advised that the need for flexibility in the DCO must be justified in the application.

Approach to flexibility

The Applicant explained that to achieve the level of flexibility it needed to accommodate potential changes in technology and construction methods, and to be able to demonstrate “as low as reasonably practicable” (ALARP) and “Best Available Technology” (BAT) design principles, the Applicant intends to divide the order land into different zones. The zones would either be categorized as red, which are zones with lower flexibility or green which will have a higher level of flexibility. The Applicant further clarified that no building would be allowed to be located outside its designated zone. This approach to flexibility has previously been used for the consented Meaford Energy Centre project. The Applicant explained that the design of the flexible elements would be controlled by a series of design principles to be contained within the Design and Access Statement(s) (DAS).

The Inspectorate advised the Applicant that it will be crucial to explain within the application documents why the detail necessary for ALAP and BAT will not be available at the time the application is made.

The Inspectorate queried why the roads within the redline boundary had been assigned as needing a high level of flexibility. The Applicant clarified that it was due to the possible ‘knock-on’ effect from a building moving within its designated zone having an impact on the location of the road. It was further clarified by the Applicant that localised ground conditions could affect road alignment. The Applicant was advised to justify in the application why the roads within the redline boundary needed this degree of flexibility.

The approach to temporary laydown areas would use the same principles as the ones used for the Hinkley Point C DCO. The Applicant clarified that the Marine Elements would be zoned such as to allow a limited amount of flexibility. The landscaping of the site would be controlled by limits of deviations set out in the landscaping masterplan.

The Applicant informed the Inspectorate that it intends to do a similar zoning exercise for the off-site works.

The Applicant advised that the landscaping / bunding would not require the same level of flexibility as the main part of the site and had therefore not been assigned to a zone. There would however be some necessary flexibility with regards to the gradient and maximum heights due to the compaction of soils.

The Applicant informed the Inspectorate that the construction traffic would be assessed in the Environmental Statement and that the zoning approach was accounted for and generally considered unlikely to affect levels of construction traffic.

The Applicant explained that the DCO would list the works according to which zones the works would be allocated to. The Inspectorate iterated its advice regarding the need to justify this approach to flexibility in the application. The Applicant was advised to review the North Killingholme Power Project and the Meaford Energy Centre Orders when drafting the DCO. The Inspectorate recommended the Applicant to submit the DAS as a free standing document to allow it to be updated during the examination if required.

The Applicant explained that the limits of deviation for the two zones had been calculated from the average maximum of each building within each zone.

The Inspectorate advised that the Applicant should explain what platform level is presented on figures i.e. before or after site preparation.

In drafting any DCO conditions relating to design, the Inspectorate advised that consideration is given to the timescales for the local planning authority to sign off and discharge the conditions and the implications this may have on their construction programme.

Generic Design Assessment (GDA)

The Applicant informed the Inspectorate that it is working with the Office for Nuclear Regulation (ONR) on its approach to design within the DCO.

Decommissioning

The Applicant explained that the area and buildings needed for decommissioning of the power station would only be described by the maximum dimensions and what type of zone it would be located in. The Applicant further clarified that, due to possible changes in legislation during the lifespan of the plant, it could not specify in the application under which regime it would apply for permission needed to decommission the plant.

Approach to EIA

The Inspectorate advised that the EIA should assess the worst case scenario that could be consented. The Applicant stated that the layout of the site presented at the meeting is what it regards as the reasonable worst case scenario and that that sensitivity testing has been undertaken to determine this scenario. The Inspectorate noted the importance of explaining and justifying this approach within their Environmental Statement to give confidence that the worst case has been assessed.

The Applicant will consult on this approach in its statutory stage three formal consultation (PAC3). The Applicant clarified that the consultation material, including photomontages, would only include most likely worst case scenario and will include an explanation that there is potential for buildings to move within their zones.

Scoping

The Applicant informed the Inspectorate that it would submit its scoping request to the Inspectorate on Wednesday 3 May 2017. The Inspectorate repeated concerns expressed at previous meetings regarding scoping occurring in parallel with PAC3 consultation and highlighted the risk that it could have an impact on the responses received.

Consultation

It was confirmed that the Applicant's PAC3 consultation will go ahead as scheduled in May 2017.

Any Other Business

The Applicant informed the Inspectorate that its environmental team and DCO team are working closely together to ensure that, for example, the environmental permit application is informed by the approach to flexibility in the DCO. The Applicant was advised to include Natural Resources Wales views on flexibility when justifying its approach to the design of the plant, particularly in terms of any Best Available Technology (BAT) considerations.

The Inspectorate highlighted that it had received a letter from Isle of Anglesey County Council (IACC) raising concerns regarding the potential overlap between the Wylfa Newydd and the North Wales Connection project NSIP applications. The Applicant was advised to work closely with both the statutory consultees and with National Grid to minimise the impact of the Wylfa Newydd Nuclear Power Station and the North Wales Connection applications having similar timescales. The Applicant further advised they intended to share early drafts with IACC to minimise the impact on IACC's resources.

The Applicant confirmed that it will produce bilingual summary documents and that IACC had also requested some bilingual documents.

Specific decisions / follow up required?

- Applicant to update the Inspectorate on the submission date by the end of May.