

HORIZON

NUCLEAR POWER



Wylfa Newydd Project

Statement of Common Ground between Horizon Nuclear Power Wylfa Limited and Public Health Wales

PINS Reference Number: EN010007

19 February 2019

Revision 2.0

Examination Deadline 6

Regulation Number: 5(2)(q)

Planning Act 2008

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

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1 Introduction

1.1 Status of this SoCG

- 1.1.1 This Statement of Common Ground (hereafter referred to as the ‘SoCG’ is being submitted to the Examining Authority as an agreed final version at Deadline 6, in accordance with the examination timetable.
- 1.1.2 This is a signed and jointly agreed statement between Horizon and PHW. It is an accurate reflection of agreed, disagreed and ongoing matters at Deadline 6.
- 1.1.3 It is noted that, due to the programme for drafting, other documents submitted at Deadlines 5 and 6 are not fully reflected in this final SoCG. Where documents have been updated for these deadlines (for example the Wylfa Newydd CoCP) this does not change the status of the matters subject to this SoCG.

1.2 Purpose of this document

- 1.2.1 This SoCG is a final agreed document that has been prepared by Horizon and PHW. It has been prepared in accordance with the guidance published by the Department of Communities and Local Government (hereafter referred to as ‘DCLG Guidance’)¹ and example SoCG documents provided on the Planning Inspectorate’s website².
- 1.2.2 The purpose of this SoCG is to set out agreed factual information about the application for development consent to be made by Horizon for the construction and operation of a new nuclear power station at the Wylfa Newydd Development Area (hereafter referred to as ‘WNDA’) together with on and off-site associated development (hereafter referred to as ‘the Wylfa Newydd DCO Project’).
- 1.2.3 Paragraph 58 of the DCLG Guidance states:

“A statement of common ground is a written statement prepared jointly by the applicant and another party or parties, setting out any matters on which they agree. As well as identifying matters which are not in real dispute, it is also useful if a statement identifies those areas where agreement has not been reached. The statement should include references to show where those matters are dealt with in the written representations or other documentary evidence”

¹ Planning Act 2008: Guidance for the examination of applications for development consent (March 2015) paragraphs 58 – 65
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/418015/examinations_guidance-final_for_publication.pdf

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

- 1.2.4 The aim of this SoCG is to therefore provide a clear position of the state and extent of discussions and agreement between Horizon and PHW, at Deadline 6, on matters relating to the Wylfa Newydd Project.
- 1.2.5 This SoCG has evolved through a series of iterative drafts. These drafts have been informed by ongoing meetings between Horizon and PHW (further details are provided in section 4.1 of this SoCG). The first draft of this SoCG was provided by Horizon on 1 November 2017, for input and comment by PHW. The document has subsequently been updated as further information became available and as a result of ongoing discussions between Horizon and PHW.
- 1.2.6 This SoCG is submitted to the Examining Authority in relation to the application by Horizon under section 37 of the Planning Act 2008 (the Act) for an order granting development consent for the construction of the Wylfa Newydd DCO Project.

1.3 Description of Development

The Wylfa Newydd Project

- 1.3.1 The Wylfa Newydd Project includes:

The Enabling Works

- 1.3.2 The Enabling Works comprise the Site Preparation and Clearance Proposals (SPC Proposals) and the A5025 On-line Highway Improvements.
- 1.3.3 Horizon has submitted applications for planning permission for the Enabling Works under the Town and Country Planning Act 1990 to the Isle of Anglesey County Council (IACC) as local planning authority. The On-line Highway Improvements were granted planning permission on 13th July 2018 (ref: 27C106E/FR/ECON). The planning authority resolved to grant the SPC application subject to the signing of a legal agreement on the 5th September 2018. The Welsh Government wrote to the IACC on 13 December 2018 directing that the SPC application should be determined by the Welsh Ministers (referred to as a call-in). Horizon has now written to IACC and Welsh Government to confirm that it is withdrawing the SPC application and that all works included within the SPC application have also been applied for as part of the DCO application.

The Wylfa Newydd DCO Project

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

The Nationally Significant Infrastructure Project (NSIP)

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

Associated Development

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

- Cors Gwawr;
- Cae Canol-dydd

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

Licensable Marine Activities

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

2 Consultation with Public Health Wales

2.1.1 Horizon has engaged with PHW throughout the pre-application period and following the submission of the DCO application.

2.1.2 The preparation of this SoCG has been informed by a programme of discussions between Horizon and PHW, including the provision of comments through formal and informal consultation, and feedback provided in meetings (see Table 2-1 below).

Engagement between Horizon and PHW

2.1.3 Table 2-1 below sets out the engagement between PHW and Horizon in full, including on the following matters:

- HIA and other issues: longstanding series of discussions between Horizon and PHW relating to the scoping and the preparation of the Health Impact Assessment (APP-429);
- SoCG: discuss and document common ground.

2.1.4 PHW provided comment on the various consultation documents issued by Horizon, including at the Stage Two and Stage Three consultations.

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

Table 2-1 Public Health Wales engagement schedule: SoCG

Meeting Title / milestone	Meeting Date	Attendees	Purpose of Meeting
HIA and other issues	8 no. meetings between April 2011 – October 2015	HIA Steering Group	Regular meetings to guide the HIA as it progresses.
HIA and other issues	August 2011	Sub group of the HIA Steering Group	Application of the IACC screening tool to the Project as part of the scoping process.
HIA and other issues	September 2015	PHW	Expectations and concerns regarding the Project with regard to the public health agenda and PHW priorities.

Meeting Title / milestone	Meeting Date	Attendees	Purpose of Meeting
HIA and other issues	February 2016	HIA Steering Group	Various matters relating to HIA.
HIA and other issues	June 2016	HIA Steering Group	Various matters relating to HIA.
PHW comment	27 October 2016	n/a	PAC 2 consultation
HIA and other issues	December 2016	PHW	Liaison between HIA team and PHW and the HIA Steering Group.
HIA and other issues	January 2017	PHW	Update of Project and next steps; Terms of Reference for Steering Group; action since previous Steering Group; next Steering Group meeting.
HIA and other issues	January to May 2017	IACC; WG; BCUHB; PHW; WAS; NWP; NWFRS	Identification of issues arising from PAC2 and Level 4 meetings and progress towards Statements of Common Ground.
PHW comment	23 June 2017	n/a	PAC 3 consultation
SoCG meeting	3 rd July 2017	Horizon BCUHB / PHW	HIA Steering Group and approach to SoCG
SoCG meeting	22 December 2017	PHW	SoCG update
PHW comment	7 January 2018	n/a	PHW comments on 1 st draft SoCG
PHW comment	12 February 2018	n/a	PHW comments on draft SoCG
SoCG meeting	27 February 2018	Horizon / Atkins / Quod / NWP / PHW / BCUHB / NWFRS /	Safeguarding

Meeting Title / milestone	Meeting Date	Attendees	Purpose of Meeting
		WAST / WG / IACC / BCA	
SoCG meeting	1 March 2018	Horizon / Quod / Atkins / BCA / NWP / NWFRS / WAST, BCUHB / PHW	Labour churn meeting
SoCG meeting	2 July 2018	Horizon / PHW	Strategic relations between Horizon and PHW
PHW comment	7 August 2018	n/a	Relevant representations
SoCG meeting	21 August 2018	Horizon / BCA / PHW / BCUHB / Quod	SoCG update / health service proposals
SoCG meeting	20 November 2018	PHW / Bechtel / BCA / Quod	SoCG review
PHW comment	20 November 2018	n/a	PHW comments on draft SoCG
SoCG meeting	7 December 2018	PHW / Bechtel / BCA / Quod	SoCG review
SoCG meeting	14 December 2018	PHW / Bechtel / BCA / Quod	SoCG review
PHW comment	18 December 2018	n/a	Written representations
SoCG meeting	22 January 2019	PHW / Bechtel / BCA / Quod	SoCG review
PHW comment	12 and 13 February 2019	n/a	Written comment on SoCG

3 Final Position

3.1 Position of Horizon Nuclear Power and PHW

- 3.1.1 Horizon has engaged proactively with PHW to develop this final SoCG. Details of this engagement are set out in Table 2-1.
- 3.1.2 This SoCG was developed as an iterative draft by Horizon to reflect its understanding of PHW's position expressed verbally at meetings, in writing (most recently on the 22 January 2019), or through correspondence (including PAC2, PAC 3, Relevant Representations and Written Representations).
- 3.1.3 This final version of the SoCG is submitted to the Examining Authority in relation to the application by Horizon under section 37 of the Planning Act 2008 (the Act) for an order granting development consent for the construction of the Wylfa Newydd DCO Project.
- 3.1.4 The following schedule at table 3-1 sets out matters by topic area and an indication of whether the issue is agreed (green) or not agreed (red). This SoCG is a final version and there are no ongoing issues.
- 3.1.5 PHW does not wish to raise objections in relation to any other areas of the Project save in respect of any areas of the Project which could not be foreseen by Horizon and/or PHW at the current time as a result of changes to the Project or otherwise.

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

Health Impact Assessment Process and Methodology

Topic	Sub-issue	SoCG reference number	Document Reference/Signpost/Routemap	PHW Position	Horizon Position	RAG	Action
HIA Steering group participation		PHW 001	Health Impact Assessment Report (APP-429). Paragraphs: A.1.22 - 1.25, A5.6, - 5.7, J1.3, Appendices L , N and O.	An independently chaired HIA Steering Group, convened in 2011, has helped Horizon develop the methodology used to complete the HIA Report. The HIA Steering Group, comprised of BCUHB, PHW, Welsh Government, Wales Health Impact Assessment Support Unit (WHIASU), IAAC, Project Liaison Group and Horizon, has given advice on the assessment methodology and provided feedback on drafts of the reports. It is agreed between both parties that the level of participation by the HIA Steering Group in the development of the HIA has been satisfactory. PHW would wish to record that the HIA Steering Group was not given the opportunity to comment on the final HIA before its publication.		Agreed	No further action
HIA scoping		PHW 002	Health Impact Assessment Report (APP-429) (Chapter A.5)	PHW's position is that the scope of the HIA does not fully reflect the change in workforce accommodation strategy since PAC2 (i.e. to include the Site Campus).	The HIA Report covers everything in the HIA Scoping Report, which represents an appropriate and comprehensive scope covering the entire Wylfa Newydd DCO Project. Horizon's position is that the scope of the HIA, was subsequently updated, and the HIA assesses the final Workforce Accommodation Strategy and specifically the inclusion of the Site Campus.	Not agreed	This matter is not agreed. However, both parties are in agreement that there is a need to focus on mitigation going forward (as reflected in line below)
		PHW 002a	Health Impact Assessment Report (APP-429) (Chapter A.5)	It is agreed that constructive discussion regarding mitigation to ensure that there are no adverse impacts from the Site Campus has taken place and is reflected in this SoCG. Discussion will continue post-DCO grant and includes the health services that will be provided to the construction workforce and it includes broader issues around the wider determinants of health.		Agreed	No further action
HIA methodology		PHW 003	Health Impact Assessment Report (APP-429) (Appendix L)	It is agreed between both parties that the necessary HIA components are contained within the main HIA report and the methodology followed, as described at Appendix L, is robust.		Agreed	No further action
WHIASU		PHW 004	N/a	It is agreed that this SoCG with PHW includes the views of WHIASU (Wales Health Impact Assessment Support Unit).		Agreed	No further action

Demand for Health Protection and Screening services during construction

Topic	Sub-issue	SoCG Reference number	Document Reference/Signpost/Routemap	Agreed PHW and Horizon position	RAG	Action
Population change during construction	Worker numbers	PHW 005	Workforce Accommodation Strategy (WAS) (APP-412). Chapter 3. Health Impact Assessment Report (APP-429) (Paragraphs A3.44-3.45)	<p>The worker accommodation strategy is based on 9,000 construction workers at peak (incorporating an element of contingency to Horizon's central estimate of 8,500). The proposals to house these workers comprise:</p> <ul style="list-style-type: none"> • Provision of up to 4,000 bed spaces on the Site Campus (purpose built Temporary Workers Accommodation on-site); • A central case that relies on use of 3,000 bed spaces in existing accommodation across Anglesey and parts of the mainland • 2,000 workers recruited from existing residents recruited locally who will not therefore need temporary accommodation. <p>It is agreed that it is appropriate that the HIA is based on the peak of 9,000 workers and that the total of the non-home based workforce i.e. the 7,000 workers, is an appropriate figure on which to plan for health services.</p>	Agreed	No further action

Topic	Sub-issue	SoCG Reference number	Document Reference/Signpost/Routemap	Agreed PHW and Horizon position	RAG	Action
	Construction Programme and worker profile	PHW 006	Health Impact Assessment Report (APP-429) (Paragraphs A3.46-3.51) Workforce Accommodation Strategy (APP-412). Chapter 5, 6 and 9. Environmental Statement (APP-096). Appendix C1.2 (Technical appendix - Socioeconomics of the Environmental Statement).	A gravity model has been used to provide a means of predicting the likely spatial distribution of employees during the construction stage. Detail on the Gravity Model is set out in Appendix C1.2 to the Environmental Statement (APP-096). The Workforce Accommodation Management Service (WAMS), which forms part WAS, will match workers with accommodation that best meets their needs and avoids impacts on local communities. All workers will be registered on a database for site security purposes and this will provide a source of data to determine where workers will be living as well as their daily shift patterns. This database will be managed by Horizon and its supply chain, and it will be updated as worker numbers and locations change over the course of the construction period. This will monitor the precise location of the workforce accommodation during the construction period. PHW note the assumptions with regard to construction worker profile and both parties agree that they represent an appropriate baseline for assessment purposes. Both parties agree that the WAMS will represent an appropriate tool for monitoring and managing workforce profiles.	Agreed	No further action
	Assumptions on nationality, gender and age	PHW 007	Health Impact Assessment Report (APP-429). (Section A.3.55) Community Cohesion Report (Environmental Statement appendix C1-3) (APP-097) Chapter 4.	It is agreed that assumptions on the nationality, gender and age profile of the workforce are set out in the HIA (section A3) (APP-429). Table A-2 of the HIA also summarises the assumed origin of the international workforce. A description of these assumptions and the approach is provided in the Community Cohesion Report (Environmental Statement appendix C1-3) (APP-097). These are agreed to be appropriate assumptions for the HIA.	Agreed	No further action
	Indirect workforce	PHW 009	Environmental Statement chapter C1 (socio-economics) (APP-088). Paragraph 1.5.9.	Applying a construction sector employment multiplier of 1.9 (Scottish Government, 2016) to calculate indirect and induced employment, it is estimated that a further 1,800 jobs, in addition to the 2,000 home based mentioned above would be created as a result of the direct employment opportunities. These would all be additional home based positions, i.e. would not result in any need for temporary accommodation. Both parties agree that these assumptions on indirect workforce are appropriate.	Agreed	No further action
Workforce demands for healthcare provision and screening services	Microbiology and Laboratory services	PHW 011b	PHW D2 Written Rep, s6.2 (REP2-291) Health Impact Assessment Report (APP-429) (Paragraphs A3.46-3.51) Environmental Statement (APP-096). Appendix C1.2 (Technical appendix - Socioeconomics of the Environmental Statement).	Based on the estimates of 9,000 at peak (and a 7,000 strong non home based workforce), this represents an increase of just over 1% against the current BCUHB population (circa 700,000). Given that relative number and that the workforce is likely to be younger / fitter, the demand is not seen to require a significant uplift in PHW's laboratory infrastructure. Additional services provided by PHW microbiology will be through specific enhancements to the existing Service Level Agreement (SLA) between PHW and BCUHB. Horizon's working assumption is that laboratory services will be outsourced to a private provider. It is agreed that any outsourcing of laboratory services would meet appropriate accreditation expectations. PHW has indicated that PHW laboratories have UKAS accreditation (Medical Laboratory accreditation (ISO 15189)) and that the laboratories in Rhyl have spare capacity. Horizon proposes to include these laboratories in any commercial tendering process for laboratory services. Horizon will discuss laboratory services for pathology with BCUHB.	Agreed	No further action
Health Protection and linked healthcare provision	Medical and healthcare facilities for the workforce	PHW 013	Health Impact Assessment Report (APP-429). (Section C-6). Paragraphs C.6.41-C.6.48 / Table C-6. 'Health Services for the Construction Workforce: Discussion Document' (20.8.18) (not a DCO document, though relevant extracts to be appended to draft s106 schedule 8)	PHW have indicated that the provision of the Site Campus introduces potential challenges with regard to communicable disease. Horizon would put arrangements in place to ensure there is timely reporting of notifiable infections in line with legislation. Horizon will follow processes required by current law regarding the transfer of surveillance information into PHW's surveillance and case management systems. The Site Campus as a concentration of people has the potential to facilitate transmission of communicable infections (e.g. influenza or norovirus). The Site Campus will enable Horizon to accommodate workers in fewer places and help with the management of worker behaviour and impacts on local communities. It is agreed that the surveillance systems that will be set up as part of occupational health will help in early identification of communicable disease outbreaks and therefore reduce the potential impact. The residual significance of potential health and well-being effects is considered to be negligible for the general population (the majority of people) of Anglesey and north	Agreed	No further action

Topic	Sub-issue	SoCG Reference number	Document Reference/Signpost/Routemap	Agreed PHW and Horizon position	RAG	Action
			<p>Code of Construction Practice (REP2-031) (was updated at Deadline 5)</p> <p>Draft DCO s106 Agreement (REP3-042) (note s106 being updated for Deadline 6)</p>	<p>Wales. For particularly sensitive groups within the affected population, the residual effect would be expected to range from negligible to minor adverse (APP-429).</p> <p>Health surveillance would be conducted across the workforce. This would include employees who are identified as requiring regular health checks as well as workers who are, or may be, exposed to hazardous substances or activities that may cause them harm. This would enable Horizon to check for early signs of work-related ill-health. Records would be maintained so as to enable statistical information to be supplied from the surveillance. It is noted that all record keeping will be subject to Data Protection laws. As noted in section C.6 of the HIA Report (APP-429) the health service provider that is appointed by Horizon would collect data on the incidence of communicable disease among the workforce and links with established reporting systems would enable the identification and management of changes in prevalence. The 'Health Services for the Construction Workforce: Discussion Document' (now formalized through a scope of services in the draft DCO s.106 agreement) notes that no fees have currently been identified for these services as they will form part of the Occupational Health services.</p> <p>Adaptive monitoring: Horizon will establish an external stakeholder group (hereafter Health and Well-being Engagement Group) (secured through the Wylfa Code of Construction Practice (REP2-031) – which has been updated for Deadline 5. If appropriate the Group will discuss the need for additional mitigation or follow-up investigation. To facilitate this process, a set of key topics and indicators will be agreed. The topics will be expected to include 'access to community healthcare services'.</p> <p>Post-DCO grant Horizon will agree with PHW and Local Authorities contingency plans should there be an outbreak of infectious disease on site. PHW to provide details of the steps and processes required in the event of an outbreak of communicable diseases among the construction workforce. This will be in accordance with the Communicable Disease Outbreak Control Plan for Wales.</p>		
	Screening services	PHW 015a	<p>Health Impact Assessment Report (APP-429) . Paragraph A3.55</p> <p>Draft DCO s106 Agreement (REP3-042) (note s106 being updated for Deadline 6)</p>	<p>Horizon and BCUHB are discussing primary care services for the construction workforce prior to the opening of the Site Campus Medical Centre. Preliminary discussions were held with the GP practice at Amlwch on 4 January 2019.</p> <p>It is agreed that when the Site Campus Medical Centre is up and running that primary care services will be delivered on a walk-in centre model. This will ensure that all workers will remain registered with their GP at their place of residence. Workers will return home regularly and will be able to attend screening at their place of residence. The non-home based workforce (i.e. workers moving to Anglesey) would be predominantly male and would be between 35 and 49 years old.</p> <p>PHW notes that there would be negligible demand on screening programmes as the male construction workforce would be outside the age range for population screening.</p> <p>Partners and dependants would not have access to onsite services but would be expected to register with the NHS and would be eligible for screening.</p> <p>Access to screening for foreign nationals and non home based female members of construction workforce will be considered as operational details of the service are agreed with BCUHB/PHW (post-DCO). There will be a contractual requirement on overseas workers to have health insurance.</p> <p>As the planning matures, PHW expects HNP to engage with PHW's screening division (post- DCO grant) to ensure that the operational detail of access to screening services is covered, including financial considerations for costs of screening and that the population that come to Anglesey because of Wylfa Newydd are not disadvantaged in their offer of screening that they are eligible for.</p>	Agreed	No further action
	Families and dependants	PHW 015b	<p>Health Impact Assessment Report (APP-429) . Paragraphs C.6.14 - C.6.15.</p> <p>'Health Services for the Construction Workforce: Discussion Document' (20.8.18) (not a DCO document, though relevant extracts to be appended to draft s106 schedule 8)</p>	<p>Family members and dependants would be expected to register with local NHS services. They would not have access to on-site healthcare.</p> <p>Funding for incoming partners and dependants of workers is provided for pursuant to the draft DCO s106 agreement between Horizon and IACC.</p>	Agreed	No further action – matter addressed in BCUHB and WAST SoCG

Topic	Sub-issue	SoCG Reference number	Document Reference/Signpost/Routemap	Agreed PHW and Horizon position	RAG	Action
			Draft DCO s106 Agreement (REP3-042) (note s106 being updated for Deadline 6)			

Monitoring

Topic	Sub-issue	SoCG Reference number	Document Reference/Signpost/Routemap	Agreed PHW and Horizon position	RAG	Action
Health and Wellbeing Monitoring Group		PHW 017	Health Impact Assessment Report (APP-429) . Table C.1 Code of Construction Practice (REP2-031) (was updated at Deadline 5) Planning Statement (APP-406) - Section 7.4	<p>It is agreed that Horizon will agree the relevant health datasets for monitoring purposes with the Health and Well-being Engagement Group (secured through the DCO s106 agreement).</p> <p>It is agreed that environmental factors are important determinants of population health. PHW states that it will be necessary to discuss and agree ToR and (independent) chair for the group (November 2017 response).</p> <p>Horizon will establish an external stakeholder group (hereafter Health and Wellbeing Engagement Group) that will include members of the health and emergency services to monitor the implementation of the HIA mitigation strategy and provide advice on its delivery. When appropriate Horizon would facilitate bespoke analysis of routinely collected public health data (existing indicators), relevant to the Wylfa Newydd Project. The information would inform discussion by the Health and Well-being Monitoring Group. If appropriate the Group will discuss the need for additional mitigation or follow-up investigation. To facilitate this process, a set of key topics and indicators will be agreed. The topics will be expected to include the following:</p> <ol style="list-style-type: none"> 1. Access to NHS services; 2. Respiratory health; 3. Accident hotspots; 4. Sleep disturbance; 5. Housing market pressures; 6. Recruitment rates from local communities; 7. Safeguarding (with regard to vulnerable adults and children); and 8. Community lifestyles, behaviour, including community cohesion, and physical activity levels 	Agreed	No further action

Environmental effects

Topic	Sub-issue	SoCG Reference number	Document Reference/Signpost/Routemap	Agreed PHW and Horizon position	RAG	Action
Radiation		PHW 021	Health Impact Assessment Report (APP-429) Paragraphs A5.10-A5.19 Environmental Statement chapter D14 (APP-133). Code of Construction Practice (REP2-031) (was updated at Deadline 5)	<p>Quantitative analysis of radiological risks is presented in the radiological effects chapter of the Environmental Statement chapter D14 (APP-133), the Environmental Permitting (Radioactive Substances Regulation) (EP-RSR) application and the Article 37 submissions.</p> <p>It is agreed that it is appropriate to scope out radiation as a topic within the HIA Report (APP-429) (although the HIA does consider effects of health and well-being from public understanding of risk, which includes radiological risks).</p> <p>It is agreed that PHW will continue to be advised by experts at Public Health England when assessing radiation risks from the development e.g. in subsequent environmental permit-related consultations.</p> <p>It is agreed that Horizon would respond to any public concerns /perceptions in relation to risks arising from radiation (both ionising and non-ionising) and that this would form part of the Wylfa Newydd Engagement Framework, secured through section 3.2 of the CoCP.</p>	Agreed	No further action

Lifestyle and behaviour

Topic	Sub-issue	SoCG Reference number	Document Reference/Signpost/Routemap	PHW Position	Horizon Position	RAG	Action
Safeguarding		PHW 022	<p>Health Impact Assessment Report (APP-429)</p> <p>Workforce Management Strategy (APP-413)</p> <p>Mitigation Route Map (APP-422). Item 0111.</p> <p>Code of Construction Practice (REP2-031) (was updated at Deadline 5)</p>	<p>PHW, similar to other health organisations such as WAST and BCUHB, would like to see the production of a detailed Community Safety Management Strategy (CSMS) and for it to be considered by the relevant partners to assess whether it fully mitigates the risks identified</p>	<p>It is agreed that safeguarding is an important issue and, without appropriate action there may be risks associated with a large, predominantly male workforce.</p> <p>Horizon will implement measures that are of direct relevance to safeguarding.</p> <p>Section 3.4 of the Code of Construction Practice (submitted at Deadline 5) states that prior to the commencement of the authorised development, Horizon will prepare and submit for approval a Community Safety Management Scheme (CSMS) in accordance with the Requirements in Schedule 3 and Schedule [21]³ of the DCO. The approved CSMS (or any approved variations) will be implemented for the duration of the construction of the Wylfa Newydd DCO Project and Horizon, as set out in the DCO section 106 agreement, will continue to collaborate with emergency services for the duration of the construction period. Horizon will establish a joint working group to work collaboratively on development of the CSMS.</p> <p>As a responsible employer Horizon will (where there is the potential for likely significant effects due to the Wylfa Newydd DCO Project) work with safeguarding partners to enable them to fulfil their statutory duties with regard to safeguarding. This would be delivered through the CSMS, the detail of which is secured by requirement.</p> <p>Horizon will take such actions as it can to guide the behaviour of its construction workforce, both on-site and off-site, through the implementation of the Workforce Management Strategy (WMS) (APP-413) and the principles which it outlines in respect to the development of a Code of Conduct. The principles relate to compliance with a Code of Conduct, compliance with relevant behavioural standards, procedures and legislation, training provision and completion, as well as enforcing the use of certain Project facilities and services.</p> <p>All personnel working with, or for, Horizon at site and who will access offices where Sensitive Nuclear Material (SNI) is held, or who require access to SNI, Nuclear Material, Other Radioactive Material or access the Site Licence Site will require a minimum of Baseline Personnel Security Standard (BPSS) pre-employment check. This is in accordance with regulations under ONR and as written in the Management requirements for the contractor. Separate to BPSS checks,</p>	On-going	No Further Action

³ Please note that Schedule 21 is intended to be renumbered as Schedule 24 in the final DCO.

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					<p>Horizon staff who will work with children, such as STEM ambassadors, or with vulnerable adults will receive an enhanced DBS check. This will be co-ordinated through Human Resources.</p> <p>Horizon policies: Horizon's Modern Slavery Act Statement (2018) (available at https://www.horizonnuclearpower.com/files/downloads/our-policies/Modern-Slavery-Act-Transparency-Statement%20(2018).pdf). This sets out a robust response to the risk of modern slavery and maintains a clear focus on developing policies, process and internal capability to understand and manage future risks. This includes existing policies, principles and standards including whistleblowing procedure and a supply chain charter; proactive approach to risk; a robust due diligence approach and training and awareness raising.</p> <p>Liaison with external stakeholders: prior to, and throughout, the construction appropriate dialogue will be maintained between Horizon, the contractor and local safeguarding agencies, including North Wales Police. Discussions will include any individual or coordinated measures appropriate to avoiding risks to vulnerable groups, for example in relation to human trafficking and direct or indirect sex work. Safeguarding protocols will be prepared by Horizon in consultation with North Wales Police and IACC and reviewed annually. An appropriate number of Horizon and supply chain staff will be trained in safeguarding issues so that, for example, security staff who conduct site and/or vehicle inspections will be aware of signs of illegal activity such as human trafficking.</p> <p>Adaptive monitoring: Horizon will establish an external stakeholder group (hereafter Health and Well-being Engagement Group) (secured through the DCO s106). (Note that the s106 will be updated for Deadline 6). If appropriate the Engagement Group will discuss the need for additional mitigation or follow-up investigation. To facilitate this process, a set of key topics and indicators will be agreed. The topics will be expected to include safeguarding (with regard to vulnerable adults and children).</p> <p>Table 3 in the <i>Deadline 3 Submission - Horizon's Response to Isle of Anglesey County Council's Local Impact Report (REP3-004)</i> sets out proposed measures to reduce the potential for adverse effects on community cohesion updated with draft S106 content. These will indirectly contribute to safeguarding by improving relations with the local community and reducing the potential for adverse effects on community cohesion: Welsh language; access to services;</p>		

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					employment opportunities for local residents; business opportunities for local enterprises and community issues. Community Involvement Officers appointed by Horizon will be a key interface between the local community, key stakeholders and Horizon management.		
Safeguarding, Sexual Health and Substance Misuse		PHW 022a	WN Code of Construction Practice (REP2-031) (was updated at Deadline 5)	<p>PHW, similar to other health organisations such as WAST and BCUHB, would like to see the production of a detailed Community Safety Management Strategy (CSMS) and for it to be considered by the relevant partners to assess whether it fully mitigates the risks identified</p> <p>PHW, similar to other public sector bodies, has a role to ensure appropriate risk mitigation measures are in place to protect the health of the construction workers as well as that of the local communities in respect of these topics. Horizon has considered safeguarding of vulnerable groups in paragraphs C.7.5 – C.7.9 and the impact of substance misuse in paragraphs C.7.10 – C.7.17 of the HIA (document reference 8.19). PHW would like safeguarding, sexual health and substance misuse to be a focus of further discussion (post-DCO grant) with Horizon to understand the detailed plans that Horizon propose to put in place to mitigate the impacts.</p>	<p>Horizon agrees with PHW that discussion will take place post-DCO grant. One of the duties of the Health and Wellbeing Engagement Group would be to monitor health and wellbeing against indicators, including safeguarding vulnerable adults and children.</p> <p>The WN CoCP (as updated for Deadline 5) also establishes a series of principles for a Community Safety Management Scheme (CSMS), which will include monitoring against community safety indicators, including data on anti-social behaviour and crime and which may propose changes to practical ways of working. The content of the CSMS will be agreed with the Emergency Services Engagement Group (secured through the s106 agreement) and Schedule 19 of the updated DCO (Revision 4.0) has been updated at Deadline 5 to clearly state that the discharging authority has the right to consult any statutory body it considers relevant in the discharge of any approval under the DCO.</p>	On-going	No Further Action

Overall HIA conclusions

Topic	Sub-issue	SoCG reference number	Document Reference/Signpost/Routemap	Agreed PHW and Horizon position	RAG	Action
HIA conclusions		PHW 023	Health Impact Assessment Report (APP-429)	The overall effect for population health, taking account of differing effects across vulnerable groups and geographic levels, of the Wylfa Newydd DCO Project is considered to be beneficial. This is dependent, however, on the mitigating actions identified being implemented in practice and PHW expects to see these actions carried out	Agreed	No further action

Matters over which PHW maintains a watching brief

Topic	Sub-issue	SoCG reference number	Document Reference/Signpost/Routemap	Agreed PHW and Horizon position	RAG	Action
Population change during construction	Workforce dependents	PHW 008	<p>Health Impact Assessment Report (APP-429) (Table A.1)</p> <p>Environmental Statement chapter B2 (socio-economics) (APP-067). Paragraphs 2.4.31-2.4.32.</p> <p>Draft DCO s106 Agreement (REP3-042) (note s106 being updated for Deadline 6)</p>	<p>PHW note that colleagues in BCUHB have commented that they wish to understand the basis of the calculation of the number of dependents as they consider it to be too low. PHW reserve their judgement on this matter until BCUHB have provided comment.</p> <p>Horizon notes PHW's comment. Horizon notes that BCUHB has provided modelling on this issue (REP2-279).</p>	Agreed	No further action between PHW and Horizon

Topic	Sub-issue	SoCG reference number	Document Reference/Signpost/Routemap	Agreed PHW and Horizon position	RAG	Action
Home based workforce		PHW 010	<p>Health Impact Assessment Report (APP-429). Section C6. .</p> <p>'Health Services for the Construction Workforce: Discussion Document' (20.8.18) (not a DCO document, though relevant extracts to be appended to draft s106 schedule 8)</p> <p>WN Code of Construction Practice (REP2-031) (was updated at Deadline 5)</p> <p>Draft DCO s106 Agreement (REP3-042) (note s106 being updated for Deadline 6)</p>	<p>It is agreed that, as existing residents, the home-based workforce, would create no additional demand on local health services. They are, however, taken into account with regard to ambulance service planning needs for the Project. Serious injuries would receive initial trauma care on-site followed by ambulance or helicopter transfer to hospital. Horizon is committed to providing appropriate provision of emergency services and an appropriate financial contribution would be considered for the emergency services, for the needs of the construction workforce.</p> <p>The discussion document, Health Services for the Construction Workforce, states that the annual rate of injury and incident on-site is estimated at</p> <ul style="list-style-type: none"> • 1: major trauma requiring in-patient care. • 7: A&E attendance and treatment but no in-patient care. • 100 minor injuries. <p>This is agreed to be an appropriate figure for emergency planning purposes.</p> <p>Horizon will seek to address minor injuries on-site and will thus minimize ambulance call-out for the minor injuries. The minor incidents (estimated number per year: 100) will not require WAST attendance as they will be treated on site or transferred to A&E by non-emergency site transport for further treatment, eg x-ray, if required.</p> <p>Monitoring will be conducted through the Health and Well-being Engagement Group (secured through the draft DCO s106 agreement).</p> <p>This issue is under discussion, and separate SoCGs are being prepared, with BCUHB and WAST with regard to the provision of on site care and ambulance service provision.</p> <p>PHW confirms that, for the purposes of the PHW SoCG, this matter can be agreed and further detail regarding on site injuries and incidents is subject to separate discussions with BCUHB and WAST.</p>	Agreed	No further action between PHW and Horizon
Workforce demands for healthcare provision and screening services	Non home based workforce, families and dependants	PHW 011	<p>Health Impact Assessment Report (APP-429). Section C.6.</p> <p>'Health Services for the Construction Workforce: Discussion Document' (20.8.18) (not a DCO document, though relevant extracts to be appended to draft s106 schedule 8)</p>	<p>It is agreed that the specification for the services that will be provided on the site (which includes Site Campus Medical Centre including the Occupational Health and Occupational Hygiene services) is considered through the SoCG with BCUHB. This SoCG includes a work programme to give confidence that appropriate steps will be taken to establish the operational arrangements to deliver healthcare for the construction workforce across the whole Project and to give both parties assurance that arrangements for health services are robust; meet required professional, clinical and statutory requirements; and minimise unintended consequences for local NHS services through unanticipated demand.</p> <p>PHW confirms that, for the purposes of the PHW SoCG, this matter can be agreed and further detail regarding Occupational Health and Occupational Hygiene services will be subject to separate discussions with BCUHB (post DCO).</p>	Agreed	No further action between PHW and Horizon
Community need for health services		PHW 012	<p>Health Impact Assessment Report (APP-429). Paragraphs B.6.7 and B.6.8.</p>	<p>The HIA Report (APP-429 at B.6.7 and B.6.8) sets out the measures arising from the Wylfa Newydd Project that would complement BCUHB and PHW initiatives that promote health and well being (including provision of outdoor social areas and sports facilities, no smoking policies, sexual health awareness and education and employment initiatives).</p> <p>The HIA Report (APP-429) concludes that the Wylfa Newydd Project is likely to have a net beneficial influence on public health as a result. An increase in need for health services across north Wales is not therefore considered likely. There is however a need for local service planning to be cognizant of small area effects for particularly vulnerable sub-populations.</p> <p>This issue is considered by the SoCGs being prepared with BCUHB and WAST with regard to the provision of on site care and ambulance service provision.</p> <p>PHW confirms that, for the purposes of the PHW SoCG, this matter can be agreed and further detail re health services across North Wales is subject to separate discussions with BCUHB.</p>	Agreed	No further action between PHW and Horizon
Health Protection and linked		PHW 014	<p>Health Impact Assessment Report (APP-429). (Section C-6). Paragraphs C.6.41-C.6.48 / Table C-6.</p>	<p>In its PAC3 response and its November 2017 comments PHW noted that the proposed on site occupational health and GP service is welcomed but needs further detail, including with regards to the following matters.</p>	Agreed	No further action between PHW and Horizon

Topic	Sub-issue	SoCG reference number	Document Reference/Signpost/Routemap	Agreed PHW and Horizon position		RAG	Action
healthcare provision			Draft DCO s106 Agreement (REP3-042) (note s106 being updated for Deadline 6) Code of Construction Practice (REP2-031) (was updated at Deadline 5) 'Health Services for the Construction Workforce: Discussion Document' (20.8.18) (not a DCO document, though relevant extracts to be appended to draft s106 schedule 8)	PHW PAC3 response/question	Agreed position	Agreed	
				Service provision for a shift-based workforce and out-of-hours and weekend provision.	On-site occupational health and GP services are considered in the SoCG with BCUHB.		
				How staff for the service will be identified given the already stretched primary care services in the area.	See PHW 018		
				What (if any) on-site sexual health services will be provided.	The on-site health promotion campaigns will provide consistent messages concerning sexual health. Workers will be able to access advice and treatment at the on-site facility, although they may prefer the anonymity of clinics outside the work setting. Contingency funds to be identified if monitoring identifies an increase in the use of off-site sexual health services. Monitoring would cover use of sexual health services (need to respect confidentiality but would be possible to identify if there is an uptake in service use).		
				How the occupational health service strategy will mitigate against communicable disease risks (e.g. pre-employment screening, vaccination of staff).	See PHW 013		
<p>Adaptive monitoring: Horizon will establish an external stakeholder group (the Health and Well-being Engagement Group) (secured through the draft DCO s106 agreement). If appropriate the Group will discuss the need for additional mitigation or follow-up investigation. To facilitate this process, a set of key topics and indicators will be agreed. The topics will be expected to include 'access to community healthcare services'.</p> <p>PHW confirms that, for the purposes of the PHW SoCG, this matter can be agreed and further detail re health services across North Wales is subject to separate discussions with BCUHB.</p>							
Provision of occupational health and hygiene services	Health care provision for the non home based construction workforce	PHW 016	Health Impact Assessment Report (APP-429) . Table C.6 Draft DCO s106 Agreement (REP3-042) (note s106 being updated for Deadline 6) Schedule 8 (health) 'Health Services for the Construction Workforce: Discussion Document' (20.8.18) (not a DCO document, though relevant extracts to be appended to draft s106 schedule 8)	Horizon is committed to providing appropriate Occupational Health and Hygiene services for the construction and operational workforce. The central feature of Horizon's health and welfare Programme would be the provision of an on-site Site Campus Medical Centre. This would ensure that local community health and welfare services and resources used by local residents are not adversely affected by the Project. It is agreed between both parties that the provision of occupational health facilities is beyond the population health remit of PHW and will be a matter for discussion between Horizon and BCUHB.		Agreed	No further action between PHW and Horizon
Potential migration of skilled medical staff	Displacement	PHW 018	Environmental Statement, chapter C1 (APP-088)Horizon's Jobs and Skills Strategy (APP-411); Health Impact Assessment Report, Section C.9 (employment, income and economic development) (APP-429)	In its PAC3 response and its November 2017 comments PHW noted that the proposed on site occupational health and GP service is welcomed but needs further detail, including with regards to the displacement of staff. Horizon has set out the assessment it has undertaken and the steps (set out in the Jobs and Skill Strategy (APP-411)) to guarantee the availability of a skilled and competent workforce into the future. These steps have been developed taking cognizance also of the effects of skills displacement within the wider community and sensitive to community issues such as use of the Welsh Language. Horizon has undertaken three stages of Pre-Application Consultation over the last three years. Feedback from these has highlighted concerns about existing employers losing staff to the project. The business survey		Agreed	No further action between PHW and Horizon

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			Draft DCO s106 Agreement (REP3-042) (note s106 being updated for Deadline 6)	<p>undertaken by Horizon also identified a limited number of businesses concerned about losing staff. However, it is clear there is a possibility that some staff will change jobs and that this may leave behind vacancies that cannot be filled internally.</p> <p>Horizon recognises that the job opportunities on the Isle of Anglesey can pose challenges for the public sector. Horizon recognises also that IACC, BCUHB, WAS, NWP and NWFRS have the detailed knowledge and professional skills to forecast and prepare Workforce Strategies for each of their organisations respectively.</p> <p>To that end a commitment has been recorded in the Mitigation Route Map (Item 0098, APP-422) for support through sharing of workforce information, assisting in carrying out any required monitoring and the provision of an appropriate financial contribution and/or support to the IACC and BCUHB for officer time within those organisations. A payment will enable IACC and BCUHB to develop their workforce strategies (secured through the s106 agreement).</p>			
Potential migration of skilled medical staff	Displacement	PHW 018a	<p>Environmental Statement, chapter C1 (APP-088) Horizon's Jobs and Skills Strategy (APP-411);</p> <p>Health Impact Assessment Report, Section C.9 (employment, income and economic development) (APP-429)</p> <p>Draft DCO s106 Agreement (REP3-042) (note s106 being updated for Deadline 6)</p>	<p>PHW understands that Horizon, in the draft DCO s106 agreement, indicated "for onward payment to Public Health Wales a payment of £50,000 for staffing and workforce planning to minimise the impacts of labour churn on its staff, payable by the Developer prior to Implementation".</p> <p>PHW have been led to believe by Horizon that the payment of £ 50,000 for staffing and workforce planning to minimise the impacts of labour churn on its staff and this payment would be confirmed in the s106 agreement. However Horizon have retracted this commitment on the grounds that the commitment in the draft s106 agreement was a drafting error and the position remains unresolved.</p> <p>The provision to make a payment of £50,000 to PHW , as outlined in the draft DCO s106, was not made know to PHW until 12 February 2019. This matter was brought to the attention of PHW by Welsh Government. Hence PHW took legal advice on this matter and as per that advice suggested the amendment noted by Horizon.</p> <p>Notwithstanding the fact that PHW had not previously directly raised the issue of displacement, it is properly a matter of concern and PHW believes that a legitimate case can and should be made for a financial contribution to mitigate the potential impact of labour displacement</p>	<p>The reference to the £50,000 contribution appears in the draft DCO s106 issued to Welsh Government on 23rd January.. This was pointed out by PHW on 12th February 2019. Horizon explained that this is a drafting error. PHW is, however, reluctant to remove this text.</p> <p>PHW 018 relates to displacement and PHW has not questioned this in any of the meetings prior to 12th February 2019. The draft of this SoCG prior to the 12th February included as agreed text that it was "agreed that PHW does not have a direct concern with regard to the potential issue of displacement though would have a continued interest in the discussions with BCUHB on this matter". PHW requested that this was removed on 13th February</p> <p>A case has not been made for a payment from Horizon to PHW for displacement.</p> <p>Horizon also note that if PHW did experience any loss of employees to the Wylfa Newydd DCO Project they would be able to benefit from the measures in place through the WNESS.</p>	On-going	To be decided in s.106 negotiation
Air pollution		PHW 019	Health Impact Assessment Report (APP-429) Sections C2 and D2	<p>It is agreed that the HIA Report (APP-429) addresses air quality impacts in terms of emissions from vehicles on the local network, emissions from the WND A and dust generation.</p> <p>PHW notes that the UK Air Quality Objectives set ambient air quality standards intended to protect human health from air pollution; also, more stringent WHO guidelines exist.</p> <p>As air quality locally is generally good, and currently within WHO guideline values, PHW does not want to see any significant deteriorations in local air quality linked to the development. Horizon is committed to keeping impacts from the Wylfa Newydd development As Low As Reasonably Practicable (ALARP). PHW supports this and notes that its position is that there should be as little adverse change in local air quality as practicable.</p>	Agreed	No further action between PHW and Horizon	

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				PHW understands that the IACC SoCG has agreed an enhanced local air quality monitoring regime, including triggers to act to mitigate air pollution. PHW is not sighted to the detail of this monitoring regime and as such, reserves the right to comment on any proposals once received.		
Noise		PHW 020	Health Impact Assessment Report (APP-429) Sections C3 and D3	The HIA Report addresses noise impacts from both traffic generation and construction. PHW understands that the IACC SoCG has agreed a noise monitoring regime, including triggers to act to mitigate noise pollution. PHW is not sighted to the detail of this monitoring regime and as such, reserves the right to comment on any proposals once received.	Agreed	No further action between PHW and Horizon
Contingency planning for emergency preparedness, resilience and response		PHW 024		Under the Civil Contingencies Act, 2004, PHW is a category 1 responder and is expected to play a full part in the planning for and responding to public health emergencies. PHW is a full member of the North Wales Local Resilience Forum (NWLRF). PHW would like to see this project's implications being considered in all of the LRF planning assumptions and appropriate mitigations put in place. PHW will continue to work with partners in the LRF to provide input into the planning and response arrangements.	Agreed	No further action between PHW and Horizon

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