



## Wylfa Newydd Project

Statement of Common Ground between  
Horizon Nuclear Power Wylfa Limited and  
North Wales Police

PINS Reference Number: EN010007

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25 March 2019

Revision 3.0

Examination Deadline 8

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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 at Deadline 8 to reflect the position of Horizon and North Wales Police (NWP).
- 1.1.2 The document represents an accurate reflection of the matters discussed between the two parties, including further discussions with NWP on 4<sup>th</sup> March 2019 and at the Hearing on s106 agreement matters (6<sup>th</sup> March 2019). It is submitted as a mutually agreed working draft.
- 1.1.3 The purpose of this revision at Deadline 8 is primarily to reflect the significant progress made between the two parties in relation to the Emergency Services (Police) Contribution.
- 1.1.4 For the avoidance of doubt, this document supersedes the draft SoCG between Horizon and NWP submitted by Horizon at Deadline 6 [REP6-035] and the tracked changed version submitted by the NWP at Deadline 6 [REP6-058].

## 1.2 Purpose of this document

- 1.2.1 This SoCG has been prepared in accordance with the guidance published by the Department of Communities and Local Government (hereafter referred to as ‘DCLG Guidance’)<sup>1</sup> and example SoCG documents provided on the Planning Inspectorate’s website<sup>2</sup>.
- 1.2.2 Paragraph 58 of the DCLG Guidance states:

*“A statement of common ground is a written statement prepared jointly by the applicant and another party or parties, setting out any matters on which they agree. As well as identifying matters which are not in real dispute, it is also useful if a statement identifies those areas where agreement has not been reached. The statement should include references to show where those matters are dealt with in the written representations or other documentary evidence”*
- 1.2.3 The aim of this SoCG is to therefore provide a clear position of the state and extent of discussions and agreement between Horizon and NWP on matters relating to the Wylfa Newydd Project.
- 1.2.4 This SoCG has evolved through a series of iterative drafts. These drafts have been informed by on-going meetings between Horizon and NWP. The first draft of this SoCG was provided by Horizon in October 2017, for input and comment by NWP, and was discussed at subsequent meetings, as listed at

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<sup>1</sup> Planning Act 2008: Guidance for the examination of applications for development consent (March 2015) paragraphs 58 – 65  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/418015/examinations\\_guidance-final\\_for\\_publication.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/418015/examinations_guidance-final_for_publication.pdf)

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

Table 2-1 below. A revised draft (3<sup>rd</sup> draft) was issued to NWP on 17<sup>th</sup> July 2018 to which NWP provided detailed comments on 26<sup>th</sup> October 2018, prior to submission of the draft SoCG at Deadline 2.

- 1.2.5 More recently the SoCG was updated to reflect matters discussed between NWP and Horizon at a meeting on 24<sup>th</sup> January 2019 (at which an emerging draft of the revised s106 agreement was shared with NWP), and submitted by Horizon as a 'non agreed' draft at Deadline 6 [REP6-035]. NWP also submitted a tracked changed version of the SoCG at Deadline 6 [REP6-058]. Since then, significant progress has been made through more recent discussions with NWP (on the 4<sup>th</sup> March 2019 and subsequently through the 6<sup>th</sup> March 2019 Hearing) with regard to the Emergency Services (Police) Contribution.
- 1.2.6 This SoCG is being submitted to the Examining Authority in relation to the application by Horizon under section 37 of the Planning Act 2008 (the Act) for an order granting development consent for the construction of the Wylfa Newydd DCO Project.

## 1.3 Description of development

### *The Wylfa Newydd Project*

- 1.3.1 The Wylfa Newydd Project includes:

#### **The Enabling Works**

- 1.3.2 The Enabling Works comprise the Site Preparation and Clearance Proposals (SPC Proposals) and the A5025 On-line Highway Improvements.
- 1.3.3 Horizon 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 13<sup>th</sup> July 2018 (ref: 27C106E/FR/ECON).
- 1.3.4 The planning authority resolved to grant the SPC application subject to the signing of a legal agreement on the 5<sup>th</sup> 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**

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

## The Nationally Significant Infrastructure Project (NSIP)

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

## Associated Development

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

1.3.6 The Power Station will be operational for approximately 60 years after which it will be decommissioned. The buildings will be removed from the site and all

spent fuel and radioactive waste managed. The end state of the site will be agreed with the regulators.



## 2 Consultation with NWP

### 2.1 Consultation with NWP

2.1.1 The preparation of this SoCG has been informed by a programme of discussions between Horizon and NWP, including the provision of comments through formal and informal consultation, and feedback provided in meetings.

#### *Meeting schedule*

2.1.2 Horizon met with NWP to discuss and document common ground on the following dates:

**Table 2-1 Meetings between Horizon and NWP to discuss SoCG**

Meeting Date	Attendees	Purpose of Meeting
29 June 2017	Horizon / NWP	Project update
13 July 2017	Horizon / NWP	Project update
21 September 2017	Horizon / Quod / Atkins / Barton Wilmore / NWP	SoCG - update
4 October 2017	Horizon / Atkins / NWP	SoCG - update
23 October 2017	Horizon / Atkins / NWP / WAST	SoCG & EPCC Construction subgroup
13 November 2017	Horizon / Quod / Atkins / Jacobs / NWP / WAST / NWFRS	SoCG - Design meeting
13 November 2017	Horizon / Quod / Atkins / NWP	SoCG update
20 November 2017	Horizon / Quod / SDG / NWP / NWFRS / WAST	Highways meeting
3 December 2017	Steer / Quod / Vectos / Barton Wilmore	Highways meeting
19 December 2017	Horizon / Quod / Atkins / NWP	Security meeting
14 February 2018	Horizon / Atkins / NWP	Security meeting
27 February 2018	Horizon / Atkins / Quod / NWP / PHW / BCUHB / NWFRS / WAST / WG / IACC / BCA	Safeguarding
1 March 2018	Horizon / Quod / Atkins / BCA / NWP / NWFRS / WAST , BCUHB / PHW	Labour churn meeting
23 March 2018	Quod / Atkins / NWP / NWFRS	DCO application process

Meeting Date	Attendees	Purpose of Meeting
3 August 2018	Horizon / Quod / Atkins / NWP	SoCG Update meeting
15 November 2018	Horizon / Quod / NWP / Barton Wilmore / Clifford Chance / WBD	SoCG / service impact report meeting
23 January 2019	Vectos / Steer	T&T Traffic and Transport meeting
24 January 2019	Horizon / Quod / DWD / NWP / Barton Wilmore / Clifford Chance / WBD	SoCG / s106 / service impact report meeting
4 March 2019	Horizon / Gore / NWP	s106 / service impact report meeting

### ***Comments Provided by NWP***

- 2.1.3 Horizon shared with NWP (amongst other statutory consultees) the draft application documents to support the DCO application that they requested, in September and October 2017, and drafts of amended documents during the examination.
- 2.1.4 Comments on consultation documents and draft DCO documents were provided on the following dates:

**Table 2-2 Comments Provided by NWP**

Date	Consultation
24 October 2016	PAC 2 consultation
22 June 2017	PAC 3 consultation
11 December 2017	Comments on draft DCO documents
13 August 2018	Relevant Representation
26 October 2018	Comments on draft SoCG
28 November 2018	NWP Deadline 1 submission
7 December 2018	NWP Deadline 2 submission (including Written Representation)
19 December 2018	NWP Deadline 3 submission
22 January 2019	NWP Deadline 4 submission
13 February 2019	NWP Deadline 5 submission – cover letter
13 February 2019	NWP Deadline 5 submission – s106 Heads of Terms

Date	Consultation
13 February 2019	NWP Deadline 5 submission – letter to PINS
22 February 2019	NWP Deadline 6 submission
22 February 2019	NWP Deadline 6 submission – Draft SoCG Track Changed <sup>3</sup>
1 March 2019	Material provided by NWP to the ExA (the “NWP Paper”)
21 March 2019	NWP comments on revised SoCG (for submission at Deadline 8)

- 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 on-going discussions associated with, this SoCG. The PAC 2 and PAC 3 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 and comments from NWP.
- 2.1.6 Horizon shared the amended Deadline 5 version of the draft Workforce Management Strategy with NWP on 1 February 2019 and the draft Deadline 5 version of the Wylfa Newydd Code of Construction Practice with NWP on 5 February 2019 (prior to their submission at Deadline 5). A revised draft of the SoCG was issued to NWP on 30<sup>th</sup> January 2019 to reflect the matters discussed at the meeting on 24<sup>th</sup> January. NWP subsequently advised Horizon that NWP would not be in a position to provide further comments on the SoCG until it had received and reviewed Horizon’s response to the Police Impact Assessment (submitted by Horizon at Deadline 5).
- 2.1.7 Two versions of the SoCG were therefore submitted into the Examination at Deadline 6. The version submitted by Horizon [REP6-057] noted that this was not a draft agreed with NWP though accurately reflected the current position at that time. The version issued by NWP [REP6-058] provided track changes on the working draft of the document issued by Horizon on 30<sup>th</sup> January 2019.
- 2.1.8 This updated draft at Deadline 8 consolidates the document and reflects the further discussions and progress between the two parties.

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<sup>3</sup> Note that the track changed version of the SoCG issued by NWP was on an earlier working draft of the document provided by Horizon on 30<sup>th</sup> January.

## 3 Current Position

### 3.1 Position of Horizon Nuclear Power and NWP

- 3.1.1 The following Table (Table 3-1) seeks to set out the position of NWP alongside Horizon's position as of 21<sup>st</sup> March 2019.
- 3.1.2 The topics for inclusion in this table were based on the consultation responses provided by NWP at PAC 2, PAC 3, the initial SoCG meetings and the draft DCO documents submitted to NWP by Horizon.
- 3.1.3 The SoCG was subsequently restructured to a more focused list of issues for the submission at Deadline 2, based on an amended draft SoCG provided by NWP on 26 October 2018.
- 3.1.4 It sets out matters by topic area and an indication of whether the issue is agreed (green), not agreed (red) or ongoing (amber). For expediency, the schedule focusses on those areas upon which NWP have expressed interest or concern, which can be summarised under seven topic areas; these are:
- Demand on police services
  - Traffic and transport
  - Marine Off-Loading Facility ("MOLF")
  - Protest
  - Workforce implications
  - Documents, policies and strategies requiring NWP input
  - The draft DCO and draft DCO s106 agreement.
- 3.1.5 Matters that are "ongoing" or "not agreed" will continue to be the subject of on-going discussion wherever possible to resolve or refine the extent of disagreement between the parties throughout the DCO Examination process (and where appropriate the Examining Authority will be updated on any change in the status of issues). This draft SoCG reflects the most recent discussions of the 4<sup>th</sup> March 2019 and the s106 Hearing of the 6<sup>th</sup> March 2019 and is submitted as a mutually agreed working draft (as of 21<sup>st</sup> March 2019).

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**Table 3-1 Statement of Common Ground between NWP and Horizon**

Topic	Sub topic	Document Reference/ Signpost/ Routemap	SoCG ID	NWP position	Horizon position	RAG	Action required to inform further discussion on issue
Increase in demand on NWP services during construction	Potential to increase demand for NWP services	ES Volume C - Project-wide effects C1 - Socio-economics [APP-088]	NWP A.14	It is agreed that the construction period of the Project has the potential to increase the demand for NWP services in a number of areas arising from the workforce population and construction activities. It is further agreed that suitable mitigation is required to ensure that the impacts of the Project do not detract from the current level and quality of services and facilities made available to NWP's existing population and communities. However, the extent of mitigation required is not agreed at this stage (as set out in the table below).		Agreed	No further action
	Workforce assumptions	Workforce Accommodation Strategy [APP-412]	NWP A.2a	The DCO Application and its associated assessments are based on 9,000 construction workers being deployed in delivering the Project at the peak of activity at Q4 of 2023, with varying numbers of workers prior to and beyond this period. During peak construction, 2,000 workers are expected to be home based, leaving 7,000 non-home based. 4,000 of the non-home based workers will be accommodated in the Temporary Workers Accommodation on-site (i.e. the Site Campus) and 3,000 are expected to use bed-space accommodation across Anglesey and parts of the mainland. It is agreed that service impact will be assessed based on the expected accommodation split highlighted above.		Agreed	No further action

<sup>4</sup> Note that the table adopts the NWP SoCG ID numbering system

Topic	Sub topic	Document Reference/ Signpost/ Routemap	SoCG ID	NWP position	Horizon position	RAG	Action required to inform further discussion on issue
	Workforce assumptions – Monitoring (reporting)	Workforce Accommodation Strategy [APP-412] Draft s106 Agreement [REP6-004] <sup>5</sup>	NWP A2b(i)	NWP require an obligation placed directly on HNP to provide NWP with the accommodation monitoring data	<p>The DCO is assessed on the basis of the 4,000 Site Campus, 3,000 non-home based workers, 2,000 home based workers split.</p> <p>Horizon will monitor and manage the distribution of the workforce within this split, through the Workforce Accommodation Management Service (WAMS) which will be secured by the s.106 agreement.</p> <p>Horizon has amended the s.106 agreement to provide the relevant WAMS data which gives the location of the workforces' accommodation to the ESEG.</p>	On-going	Subject to ongoing s106 discussions

<sup>5</sup> A further revised draft s106 was shared with NWP on 18<sup>th</sup> March 2019 as part of on going dialogue.

Topic	Sub topic	Document Reference/ Signpost/ Routemap	SoCG ID	NWP position	Horizon position	RAG	Action required to inform further discussion on issue
	Workforce assumptions – Monitoring (link to Emergency Services (Police) Contribution)	Draft s106 Agreement [REP6-004]	NWP A2b(ii)	Any subsequent change [to the above workforce assumptions] may require further assessment. A suitable plan, monitor and manage regime therefore needs to be established to address the implications of any further variation in these circumstances.	<p>The use of contingency funds has been reduced across the s106 agreement and Horizon is not proposing a contingency fund for the emergency services. The police funding is robust without further contingency funding.</p> <p>Contingency in respect of the impacts for policing are now built in de facto through the revised formula in the s106 Agreement where police funding flexes where worker numbers are higher (or lower) and modelled for the duration if the construction period is longer (the potential for a delay in the construction programme has been provided for in the s106 agreement). See A.5.</p> <p>Contingency in relation to protest and traffic and transport are considered separately below.</p>	Ongoing	Subject to ongoing s106 discussions
	Level of impact	ES Volume C - Project-wide effects	NWP A.3	NWP does not agree to this statement (Horizon's position in the first paragraph in the	Based on the increase in population, Horizon's position is that the potential increase	Not agreed	No further action



Topic	Sub topic	Document Reference/ Signpost/ Routemap	SoCG ID	NWP position	Horizon position	RAG	Action required to inform further discussion on issue
		C1 - Socio-economics [APP-088]		column to the right i.e. that “based on the increase in population, Horizon’s position is that the potential increase in crime rate is a negligible impact of the Project with no significant effect”) and has produced a more detailed assessment explaining the impacts of the increase in population that will affect NWP. This assessment has been submitted to the Examination.	in crime rate is a negligible impact of the Project with no significant effect. Horizon does however recognise that the Wylfa Newydd Project is likely to create demand on the North Wales Police service (paragraphs 1.5.63 – 1.5.68 of Chapter C1 of the ES [APP-088].		The conclusions of Horizon’s Socio economic assessment (at Chapter C1 of the ES [APP-088] are not agreed, however, Horizon is committed to providing an appropriate contribution to NWP to mitigate the potential increase in demand on NWP services.  The quantum of contribution is considered separately below.
	Potential impacts of the project	Deadline 5 Submission - Wylfa Newydd Code of Construction Practice [REP5-021]  Draft Development	NWP A.4	NWP have identified that impacts of the Project that have the potential to increase demand for NWP services include, but are not necessarily limited to: <ul style="list-style-type: none"><li>- Incidents and crime on and off site (including Temporary Workers Accommodation);</li></ul>	Horizon does not necessarily disagree with this list of potential impacts, though propose that they should be agreed with NWP and established in the Community Safety Management Scheme (CSMS).  Both parties agree that it is appropriate for Horizon and	Ongoing	NWP to review Horizon Deadline 8 CoCP revisions.

Topic	Sub topic	Document Reference/ Signpost/ Routemap	SoCG ID	NWP position	Horizon position	RAG	Action required to inform further discussion on issue
		Consent Order Revision 4.0 [REP5-003]  Draft s106 Agreement [REP6-004]		<p>requiring police attention;</p> <ul style="list-style-type: none"> <li>- Increased night-time economy;</li> <li>- Increased incidents and crime off-site as a result of increased population;</li> <li>- Cyber-crime;</li> <li>- Hate crime;</li> <li>- Increased pressures on roads policing (see B);</li> <li>- Safeguarding; and</li> <li>- Intangible future impacts.</li> </ul> <p>NWP have reviewed the updated draft CoCP [REP5-020] and considers that a number of improvements have been made, though reserve further comment until revised CoCP's have been submitted by Horizon (as set out in NWP's DL7 response).</p>	<p>NWP to work together to agree a set of principles for the production of the CSMS which would be secured by a DCO requirement, and progressed in collaboration with an Emergency Services Engagement Group (ESEG)<sup>6</sup>. This would establish how the NWP and Horizon would work collectively in relation addressing these risks.</p> <p>The Deadline 5 submission version of the Wylfa Newydd CoCP [REP5-021] includes a list of principles that the CSMS will cover which is wide ranging to ensure that the matters identified by NWP as important are addressed in the detail of the CSMS.</p> <p>Further revised CoCPs will be issued by Horizon at Deadlie 8.</p>		

<sup>6</sup> The IACC could then additionally consult NWP in its role as discharging authority for the DCO requirement

Topic	Sub topic	Document Reference/ Signpost/ Routemap	SoCG ID	NWP position	Horizon position	RAG	Action required to inform further discussion on issue
	Financial contribution	Draft s106 Agreement [REP6-004]	NWP A.5	<p>NWP have provided detailed service planning following an assessment of the impact of the Project on NWP demand, that will form the basis of the criteria under which funds will be released.</p> <p>NWP have finalised an impact report that will inform ongoing discussions with Horizon on the matter of funding, which was submitted at Deadline 3[REP3-020 and REP3-062], and has been subject to subsequent discussion and negotiation.</p> <p>At Deadline 6, based on NWP model the summary of the requested contribution was £29,298,000 for policing services and an additional £683,000 for a new temporary police facility.</p> <p>The current position following the 6th March Hearing on s106 matters is a minimum of £11,226,406 (to be adjusted in line with NPCC Guidelines to reflect local circumstances) for policing services, and provision of space (at a minimum specification) for the</p>	<p>Horizon appointed Gore Associates to provide a review of NWP's impact reports.</p> <p>At Deadline 6, based on Horizon model the summary of Horizon's position was £6,170,242 for policing services, and provision of space for the NWP within a Horizon building on the WNDA.</p> <p>The current position following the 6th March Hearing on s106 matters was £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, and provision of space for the NWP within a building on the WNDA</p>	On-going	<p>Subject to ongoing s106 discussions</p> <p>Following the 6th March Hearing the funding difference between Horizon and NWP has reduced from £23,810,758 to £2,779,362. This represents the current position at the time of drafting this SoCG update (21<sup>st</sup> March), though both parties will continue to seek an agreed position on the financial contribution prior to the end of the examination.</p>

Topic	Sub topic	Document Reference/ Signpost/ Routemap	SoCG ID	NWP position	Horizon position	RAG	Action required to inform further discussion on issue
				NWP within a building on the WNDA.			
<b>Traffic and Transport related impacts during construction</b>	A5025 between Amlwch and Cemaes	ES Volume C - Road traffic-related effects (project-wide) App C2-4 - DCO Transport Assessment (APP-100) NWP Deadline 4 submission (REP4-043)	NWP B.1	<p>NWP does not agree with this conclusion [in Horizon's position in the column to the right i.e. that the highway alignment on the A5025 between Amlwch and Cemaes does not require improvement] and has produced further evidence to support its position that mitigation is required. NWP has also commissioned Vectos, a transport consultant, to review the adequacy of the transport assessment and whether this necessitates additional mitigation to be sought as a result.</p>	<p>Horizon considers that its mitigation is robust and appropriate for the impacts of the Project. The highway alignment on the A5025 between Amlwch and Cemaes does not require improvement having regard to the horizontal and vertical alignment of the highway, existing traffic flows and accident data, an assessment of capacity and the consideration that it will not be a main commuter or construction vehicle route to the site. The highest increase in traffic on this route owing to the Wylfa Newydd DCO Project is +4%, therefore it is not deemed necessary or appropriate for Horizon to propose mitigation in this area.</p> <p>However, a Transport (Additional Mitigation) Contribution Fund will be available through the draft DCO s.106 agreement should monitoring indicate</p>	-	Note – there were a number of matters relating to Traffic and transport discussed in detail between Steer and Vectos. Rather than record in full here it is more relevant to refer to NWP's Deadline 4 response and Horizon's response submitted at Deadline 5.

Topic	Sub topic	Document Reference/ Signpost/ Routemap	SoCG ID	NWP position	Horizon position	RAG	Action required to inform further discussion on issue
					that this is an issue and funds will be able to be drawn down if agreed by IAGG.		
	Key Strategic routes	ES Volume C - Road traffic-related effects (project-wide) App C2-4 - DCO Transport Assessment (APP-100)  Phasing Strategy (REP4-014)	NWP B.2	NWP does not agree that the embedded mitigation measures [referred to in Horizon's position] are necessarily sufficient to effectively manage congestion on key strategic routes. When having regard to the anticipated level of HGV and car trips to be generated at peak times during the construction period, the potential for significant effects on the A55 and Britannia Bridge, which already experience near capacity or at capacity conditions, it is an area of concern for NWP. As explained in B.1, NWP has commissioned Vectos, a transport consultant, to review the adequacy of the transport assessment and whether this necessitates additional mitigation to be sought as a result.	The Wylfa Newydd DCO Project includes a series of embedded mitigation measures to reduce and manage road based travel, including: <ul style="list-style-type: none"> <li>— the A5025 Off-line Highways Improvements;</li> <li>— the Logistics Centre;</li> <li>— the Park and Ride;</li> <li>— the Site Campus at the WNDA</li> <li>— the MOLF</li> </ul> all of which are to be secured through the Phasing Strategy. Before the A5025 Off-Line Highway Improvement Works are completed there are restrictions to delivery timings which removes the potential conflict of HGVs travelling on the A5025 and school start/finish times. There are also lower HGV caps now proposed in the	-	Note – there were a number of matters relating to Traffic and transport discussed in detail between Steer and Vectos. Rather than record in full here it is more relevant to refer to NWP's Deadline 4 response and Horizon's response submitted at Deadline 5.

Topic	Sub topic	Document Reference/ Signpost/ Routemap	SoCG ID	NWP position	Horizon position	RAG	Action required to inform further discussion on issue
					<p>early years (before the A5025 Off-Line Highway Improvement are completed) Both of these measures are secured in the CoCP.</p> <p>This embedded mitigation reduces the potential for road congestion that could affect emergency response times during construction.</p> <p>Regarding the Britannia Bridge, the Transport Assessment has assessed the worst case scenario in terms of traffic generation by assessing the peak hour traffic in the peak construction construction year and assuming only 60% of deliveries come via the MOLF (the aim is to deliver up to 80% via the MOLF). Furthermore, Appendix L of the Transport Assessment assesses the cumulative impact of the Wylfa Newydd Project along with the North Wales Connection project.</p> <p>In addition, sensitivity testing on the impact of traffic on the Britannia Bridge has been</p>		

Topic	Sub topic	Document Reference/ Signpost/ Routemap	SoCG ID	NWP position	Horizon position	RAG	Action required to inform further discussion on issue
					<p>undertaken at the request of the Welsh Government. The results of this sensitivity testing was provided to NWP in December 2018. This results show that even with a doubling of the proportion of construction workers living on the mainland, the impacts on Britannia Bridge are considered acceptable. This is owing to the fact that worker shift timings (which are controlled via the CoCP) are set to avoid travel during peak traffic times across the Britannia Bridge.</p> <p>Further changes which are included in the revised version of the Wylfa Newydd CoCP to be submitted at Deadline 5 include:</p> <ul style="list-style-type: none"> <li>• Mode share targets for worker travel for each year of the construction programme in line with assumptions made in the ES – these have already been shared with NWP.</li> </ul>		

Topic	Sub topic	Document Reference/ Signpost/ Routemap	SoCG ID	NWP position	Horizon position	RAG	Action required to inform further discussion on issue
					<ul style="list-style-type: none"> <li>More detail on how construction traffic will be managed, including AILs (through the preparation of an AIL Management Scheme to be approved by the Isle of Anglesey County Council in consultation with Gwynedd County Council, Welsh Government and North Wales Police).</li> <li>More detail on how traffic impacts will be monitored</li> <li>More detail on enforcement</li> </ul> <p>This will further control the traffic impacts of the Project.</p> <p>The conclusions of the Transport Assessment are that there is no additional mitigation proposed in addition to the embedded mitigation.</p>		
	Construction traffic management	Wylfa Newydd Code of Construction	NWP B.3	NWP have reviewed the updated draft CoCP (Ref: REP5-020) submitted by the applicant at Deadline 5. NWP	The measures set out in the Code of Construction Practice (CoCP), Workforce Management Strategy	On-going	NWP to review position following submission and



Topic	Sub topic	Document Reference/ Signpost/ Routemap	SoCG ID	NWP position	Horizon position	RAG	Action required to inform further discussion on issue
		Practice [REP5-020] Workforce Management Strategy [REP5-037]  Main Power Station Site sub CoCP [REP5-022] Marine Works sub-CoCP [REP5-024] Off-Site Power Station Facilities sub-CoCP [REP5-026] Park and Ride sub-CoCP [REP5-028] Logistics Centre sub-CoCP [REP5-030] A5025 Off-line Highway Improvement		considers that a number of improvements have been made to the CoCP on previous drafts. However, there remain concerns over the level of detail provided in certain sections and the way Light Goods Vehicles (LGVs) are treated in the logistics management strategy. These concerns are set out in NWP's Deadline 7 response.  NWP reserve further comment until revised CoCP's have been submitted by Horizon (as set out in NWP's DL7 response).	(WMS) and Wylfa Code of Conduct (CoC) will assist in mitigating the impact of traffic generated by the Project in relation to the matters of traffic management planning, incident management, accident analysis, fly parking, driver behaviour, road traffic accidents and abnormal loads.  In addition, the s.106 agreement includes provision for IACC to undertake traffic monitoring and promote a multi agency road safety campaign (funded by Horizon).  Horizon note that a number of DCO documents were updated and submitted at Deadlines 5 and 6, including: <ul style="list-style-type: none"> <li>Wylfa Newydd Code of Construction Practice</li> <li>Workforce Management Strategy</li> <li>Main Power Station Site sub CoCP</li> </ul>		review of modified documents submitted at Deadlines 5, 6 and 8.

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		s sub-CoCP [REP5-032]			<ul style="list-style-type: none"> <li>• Marine Works sub-CoCP</li> <li>• Off-Site Power Station Facilities sub-CoCP</li> <li>• Park and Ride sub-CoCP</li> <li>• Logistics Centre sub-CoCP</li> <li>• A5025 Off-line Highway Improvements sub-CoCP</li> <li>• Code of Operational Practice</li> </ul> <p>The changes were discussed with NWP at the meeting on 24 January 2019.</p> <p>Further updates are being made to the suite of CoCPs at Deadline 8, although these are not addressed in this SoCG. The most relevant changes to the NWP are simplification of the content of the Wylfa Newydd CoCP on the role of the Engagement Groups, to avoid duplication and confusion with the s106 agreement.</p>		

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	Impact on RPU	ES Volume C – Road traffic-related effects (project-wide) App C2-4 – DCO Transport Assessment (APP-100)	NWP B.4	The traffic and population generated by the Project will place significantly greater pressure on the resources of NWP's Roads Policing Unit (RPU). In order for NWP's RPU to continue to effectively police the road networks and communities of North Wales, mitigation will be required to resource the related front line and support services.	Horizon note NWP's position and that the detailed impact report provides specific analysis from the RPU.	-	No action (agreed that this line duplicates A.5)
<b>MOLF (construction and operation)</b>	Waterborne response	Wylfa Newydd Code of Construction Practice [REP5-020]  Marine Works sub-CoCP [REP5-024]	NWP C.1	NWP does not currently have the capability for waterborne response and the establishment of such capabilities would require significant resources and planning. The DCO Application does not contain sufficient information to enable NWP to understand how the MOLF will operate, particularly in relation to security.  Horizon has not provided details of the Port Management Plan to NWP and no mechanism has been proposed to deal with any uplift	A fully detailed plan for the operation and security of the MOLF will not be progressed further by Horizon at this stage. The operation of the MOLF will be subject to a full Port Management Safety Plan (outside the control of the DCO regime)  Horizon will provide NWP with sufficient information, at the appropriate time, in order to undertake an assessment of the potential impact of the construction and operation of	On-going	NWP to confirm recognition that operation of MOLF will be subject to separate plan outside the DCO regime.

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				in planning obligations that may result from the future assessment of the impact of the MOLF on NWP's operation.	the MOLF on the efficient running of their services.		
<b>Protest during construction and operation</b>	Site security	Design and Access Statement - Volume 3 - Associated Developments and Off-Site Power Station Facilities (Part 1 of 2) [REP4-018]  Wylfa Newydd Code of Construction Practice [REP5-020]	NWP D.1	It is agreed that Horizon has a statutory duty to prevent unauthorised access to the Project and will complete site-specific assessments of the security and trespass risk at each site and implement appropriate control measures. The site boundary will be secured and constructed such that it minimises opportunities for unauthorised entry and criminal offences by protestors.  Horizon will conduct regular security patrols of the site boundary on a 24 hours basis and this is secured by the Wylfa Newydd CoCP.		Agreed	No further action
	Waterborne protest	Wylfa Newydd Code of Construction	NWP D.2	Horizon has not provided details of its Protest Management Strategy to NWP and no contingency mechanism has been proposed to deal with any	It is agreed that the Project attracts a risk of protest. There will also be a Protest Management Scheme, aligned with the principles in the Wylfa Newydd CoCP	Ongoing	Subject to ongoing discussions

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		Practice [REP5-020]		uplift in planning obligations that may result from protest	<p>(section 4.7.4) and secured by the Requirements in Schedule 3 and Schedule 21 of the DCO (having regard to the Port Management Safety Plan delivered outside the DCO regime).</p> <p>Schedule 21 specifically identifies NWP as a consultee on the Protest Management Scheme to be submitted for IACC's approval.</p> <p>Horizon will also be contracting its own protest management contractors.</p> <p>It is not agreed that it should bear the costs of police resourcing for protest or demonstrations given that it is funding a dedicated policing team for the Project.</p>		
	Protest management	Wylfa Newydd Code of Construction Practice [REP5-020]	NWP D.3	The Wylfa Newydd Project could attract protest activity from both local and international groups prior to and during the construction phase. In such instances, facilitating the right to peaceful	Horizon recognises that there is potential for incidents that require a response and intends to develop and implement a protest management scheme in consultation with NWP and	Ongoing	Subject to ongoing s106 discussions

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				<p>protest, keeping roads and highways open, protecting the public and workers and preventing related crimes occurring are all the responsibility of NWP. Horizon has not provided details of its Protest Management Strategy to NWP and no contingency mechanism has been proposed to deal with any uplift in planning obligations that may result from protest.</p>	<p>other relevant stakeholders. This could involve the appointment of private expertise employed by Horizon.</p> <p>The principles of protest management are set out in the revised CoCP submitted at Deadline 5.</p> <p>Prior to commencement, Horizon will prepare and submit for approval a Protest Management Scheme in accordance with the Requirements in Schedule 3 and Schedule 21 of the Draft DCO, with NWP identified as a consultee. The approved Protest Management Scheme will be implemented for the duration of the construction period..</p>		
	Impact on NWP resourcing	Draft s106 Agreement [REP6-004]	NWP D.4	<p>The experience from other nationally significant energy and infrastructure projects has shown that should protests occur and become protracted the resulting impact on both the local police and border forces can be extremely detrimental to resourcing and finance. Continued protest will</p>	<p>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</p>	On-going	Subject to ongoing s106 discussions

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				have a materially detrimental impact on local communities. A mechanism for resourcing the recruitment and retention of additional specialist skilled officers therefore needs to be agreed between Horizon and NWP.	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 ExA's report specifically stated that the applicant should not have to bear the costs of policing protests and demonstrations.		
<b>Workforce Implications during construction</b>	Crime rates	ES Volume C - Project-wide effects C1 - Socio-economics [APP-088]	NWP E.1	The temporary increase in the population on the island of Anglesey and on the mainland, as a consequence of the Project, has the potential to correlate with an increase in crime rates and other instances that place a demand on NWP services. The extent to which NWP services will be affected as a result of the population increase is the subject of a detailed assessment, which has been submitted to Horizon. The	As set out in NWP A.3, Horizon consider that the findings of the Environmental Statement are robust, i.e. that based on the increase in population, Horizon's position is that the potential increase in crime rate is a negligible impact. However, as noted above, Horizon accepts that the Wylfa Newydd Project is likely to create additional demand on the North Wales Police service.	On-going	Action: As per A.5.

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				extent of this impact on demand is not agreed.	The extent of the impact is not agreed and subject to the actions set out at NWP A.5.		
	Workforce behaviour		NWP E2a	It is agreed that certain mitigation measures proposed by Horizon, relating to worker behaviour, provide the opportunity to decrease the potential for crime to occur and help to manage the impact of the Project on local communities.		Agreed	No further action
	Code of conduct	Workforce Management Strategy [REP5-037 ]	NWP E2b	The CoC will be in accordance with the principles set out in the WMS. These principles in the WMS are being updated by Horizon and will be shared with NWP prior to submission at Deadline 5. Horizon is also proposing an amendment to (PW8) Requirement PW8 to make it clearer that Horizon must ensure that construction is undertaken in accordance with the WMS. .		Agreed	No further action
<b>Documents, policies and strategies requiring NWP input</b>		Draft DCO [REP5-003]  See list at Annex 2 of NWP Deadline 4 and 5 submissions [REP4-043] [REP5-071-074]	NWP F.1	NWP's position on the level of involvement in the preparation, monitoring and review of the documents, policies and strategies was set out in detail in the Deadline 4 and 5 submission (REP4-043 and REP5-071 – REP5-074).	The DCO requires NWP to be consulted in respect of the development of identified schemes, and where identified documents are changed or amended.  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	On-going	NWP to provide specific comments on control documents



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					<p>could and would include NWP where appropriate.</p> <p>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.</p> <p>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.</p> <p>Further Horizon emphasises that if NWP has comments on the principles of control documents or schemes such as the Community Safety</p>		

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					Management Scheme, AIL Management Scheme or the Traffic Incident Management Scheme, those should be provided now.		
<b>Intangible impacts during construction</b>		Draft s106 Agreement [REP6-004]	NWP G.1	NWP has undertaken an assessment of the potential impacts of the development and this has been provided to Horizon for review. NWP has identified the impacts that will arise as the construction gets under way. These will need to be secured within the DCO or a section 106 obligation, with an appropriate mechanism and funding put in place to cater for them.	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.	Ongoing	Subejct to further s106 discussions

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<b>Development Consent Obligations / s.106 agreement</b>		Draft s106 Agreement [REP6-004]	NWP H.1	<p>Further to the assessment undertaken by NWP relating to the potential impacts of the development, a section 106 obligation is required to mitigate those impacts. This assessment has identified specific impacts on the workings and operation of NWP. Mitigation will be provided to NWP in relation to the following measures:</p> <ul style="list-style-type: none"> <li>a) Local Policing Services - Response, Neighbourhood Policing Team and Local CID</li> <li>b) Custody</li> <li>c) Operational and Emergency Planning</li> <li>d) Road Policing Unit - RPU and Commercial Vehicle Unit</li> <li>e) Force Control Centre</li> <li>f) Managed Response Unit</li> <li>g) Investigation Support Unit</li> <li>h) Crime Services - All functions</li> <li>i) Administration of Justice</li> <li>j) Programme Management and Support</li> </ul>	As set out at A.5, significant progress has been made with regard to the respective positions on the Police Services Contribution and whilst not yet fully agreed at the time of writing this SoCG Horizon will continue to work with NWP to seek agreement during the examination process.	On-going	Subject to further s106 discussions Revised s106 Schedule 9 issued to NWP on 18.3.19 for further comment by NWP and discussion

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