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Isle of Anglesey County Council
Council Offices
Llangefni
Anglesey
LL77 7TW

18 May 2018

DCRM Ref. No: HNP-HZCON-PAC-LET-00033_English

Dear Mr Williams

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)

PLANNING APPLICATION REFERENCE 38C310F/EIA/ECON: SITE PREPARATION AND CLEARANCE PROPOSALS AT LAND EAST, SOUTH AND SOUTH-WEST OF EXISTING MAGNOX POWER STATION, NORTH-WEST AND SOUTH-WEST OF TREGELE AND WEST OF CEMAES INCLUDING CEMLYN ROAD, THE EXISTING MAGNOX POWER STATION ACCESS ROAD AND TY CROES (FISHERMAN'S CAR PARK) ACCESS ROAD, ISLE OF ANGLESEY. (EASTING: 234981, NORTHING: 393137)

Submission of additional information

Pursuant to the above planning application (Application), this letter and the enclosed documents provide the following information:

- Horizon Nuclear Power Wylfa Limited's (Horizon) response to the Isle of Anglesey County Council (IACC) letter (dated 9th February) (and associated appendix) that represents a formal request for additional information in accordance with Regulation 22 of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2016 (EIA Regulations)¹ (the Reg 22 Letter).
- Horizon's response to consultation responses received from other stakeholders on the planning application.

¹ The Reg 22 Letter confirms that the IACC request has been made pursuant to the 2016 Regulations, as, in accordance with the transitional provisions of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 the 2016 regulations continue to apply to this application as the Scoping opinion was issued prior to the 2017 Regulations coming into force.

- Updates to the Application made as result of consultation responses, and clarifications to information already submitted for the Application. Horizon notes that much of this submission represents the clarification of the content of the submitted Application as opposed to new or revised information.

The enclosed information comprises the following principal documents:

- This letter, which summarises the amendments to the application, the benefits of the proposed development, how the consultation process has been considered and the proposed mitigation;
- A Regulation 22 Report which responds directly to the matters raised in the 9th February IACC letter;
- An Environmental Statement Addendum (ES Addendum) which has been produced to supplement the submitted Environmental Statement (November 2017) with relevant amendments identified where applicable in response to the Regulation 22 request and other comments made on the application;
- Addendum to the Report to Inform Habitats Regulations Assessment Screening for SPC (RIHRA Addendum) which reports on updates to the Screening Report submitted with the application;
- An updated Community Impact Report which summarises the potential impacts of the scheme on Cemaes and Tregele and also sets out proposed mitigation measures in respect of those settlements.

A schedule of the full suite of Application documents (including revised plans, etc) is set out at Appendix 1 to this letter.

Amendments to the Application

The amendments to the Application comprise:

- The removal of the diversion of a section of the Nant Porth-y-Pistyll (Phase D works) from the Application. This is the only material amendment sought, and it reduces the scope of the Application. This change requires associated amendments to the Description of Development (Section 3 of the planning application form), and the revised description of development is included in Appendix 2 to this letter;
- Proposed additional precautionary mitigation, where operations involving plant and machinery will be suspended on land to the west of Afon Cafnan during the tern nesting season. This is considered in the RIHRA Addendum;

- A minor reduction to the red line planning application boundary to remove of an area of approximately 30m by 5m in the north-western part of the site on land adjacent to Cemlyn Road. This amendment has been made to the site location plan (now Drawing WN0903-JAC-OS-DRG-00001 Rev1), as being representative of all other application drawings. It is not proposed to amend the red line boundary on the figures submitted as Volume 2 of the Environmental Statement: the amendment is so minimal as to not be demonstrably illustrated on these figures.

These amendments are assessed in the Environmental Statement Addendum and the RIHRA Addendum, and are referred to as appropriate in the Regulation 22 Report.

Horizon acknowledge that there has been uncertainty regarding the designation of the Arfordir Mynydd y Wylfa - Trwyn Penrhyn (Wylfa Head) Wildlife Site but for the purposes of the ES assessment Horizon is treating this as a Wildlife Site. This does not constitute a material change to the SPC Proposals.

The Benefits of the Application

The relationship between the SPC Application and the proposed Development Consent Order (DCO) for the Wylfa Newydd Project (the Project) remains unchanged from the submission of the Application. The basis for and benefits of carrying out the works sought under the Application (the SPC Proposals) ahead of the DCO application were set out in the cover letter to the November submission of the Application. Briefly this includes:

- allowing the earliest possible start to the Project, which is in line with government energy policies; while
- recognising and securing the first phase of economic opportunities related to the wider Project for Anglesey.

As well as further enhancing the good working relationships that have been established between stakeholders, local communities and Horizon, benefits of undertaking the SPC Proposals in advance of the Project include:

1. Enabling a reduction in the overall timescale of the delivery of the Project.
2. The opportunity to establish working groups and pilot services for management of effects in advance of the DCO which will enable those working groups and schemes to continue to work efficiently from the very start of the DCO period. This approach is endorsed by the *Wylfa Newydd Supplementary Planning Guidance* (SPG) (adopted May 2018). More information on these schemes, which would be secured by the s106 agreement, is set out in Appendix 4 below. In brief, they are anticipated to comprise:
 - Introducing an Employment and Skills Service and a Supply Chain Service Working Group. These schemes represent a significant commitment by Horizon and will be implemented in conjunction with the IACC and other stakeholders as appropriate to provide a wide range of opportunities to implement initiatives that will have short-term

and longer-term benefits to the communities of north Anglesey and the rest of the island;

- Implementation of a Welsh language scheme will be an integral part of the works to be undertaken. Horizon has a long-standing and robust commitment to the Welsh Language, and this will be supplemented by its adherence to the IACC Welsh Language policy and by commitments to the Welsh Government's and other stakeholders approach to Welsh language and culture. Horizon will also work closely with the preferred contractor for the SPC Proposals to deliver this;
 - Opening up the Local Noise Mitigation Scheme to enable surveys of properties which would potentially be affected by noise from the DCO works to be undertaken during the SPC works period. This will enable an efficient response to carrying out works on those properties in the event that the DCO is granted.
3. Remediation of significant areas of land that have been historically contaminated by asbestos fibres (approx. 6,250m³ of land), hydrocarbons (approx. 25m³ of land), and trichloroethene (approx. 125m³ of land). This contamination represents a long-term liability to the area. As part of the SPC Proposals, Horizon would remediate all historic contamination on the site and remove all invasive non-native species irrespective of the grant of the DCO.

Mitigating adverse effects

In addition to the benefits of the Application identified above, Horizon is committed to ensuring that the SPC Proposals will not result in unacceptable effects on the amenity of local communities.

The extensive work in the Environmental Statement demonstrates the Application will not result in significant adverse effects on residential receptors. This is further confirmed by the Rapid Health Impact Assessment Screening Statement, which also forms part of the Application.

A number of measures to avoid or reduce adverse effects have been embedded within the Application. This includes for example the design of the operations, the manner in which these will take place and the proposed management techniques.

Conditions to the Application will secure mitigation including delivery and adherence to the proposed SPC Code of Construction Practice (CoCP), as well as monitoring of the site. The CoCP and the conditions would also enable the IACC to have a clear and direct set of criteria with which Horizon must comply, and in the usual way, breaches of these conditions would be enforceable by the Council.

Other key mitigation includes measures such as the provision and on-going management of ecological mitigation sites in respect of reptiles and "Section 7 species". In addition, and as a result of feedback from stakeholders, the proposed s106 Agreement will also include a scheme

to secure the management of Arfordir Mynydd y Wylfa – Trwyn Penrhyn (Wylfa Head) Wildlife Site to ensure the effective ecological management of this area of approximately 25 ha. The combined provision of these ecological management measures, amounting to in excess of 60 ha, represents a significant financial investment over the period of the respective management periods and confirms Horizon's long-term commitment to protecting and enhancing the ecology of the site and the surrounding area.

Management of Post-Application Consultation from stakeholders

Consultation responses from key stakeholders

In addition, to the Regulation 22 Report (being Horizon's response to IACC's Reg 22 Letter), Horizon has also reviewed all other consultation responses received from key stakeholders² to ensure that all requests for additional information in respect of the ES are addressed.

Accordingly, an ES Addendum has been prepared, and a Consultation Response Table (included at Appendix 05-04 of the ES Addendum) addresses each of the representations made by these stakeholders and provides: a note of clarification; a sign-post to where existing information has already been provided; or additional information where required.

Response regarding health and safety matters

In addition to the matters addressed in the Consultation Response Table, the North Anglesey Partnership (a consortium of six Community Councils from the north of Anglesey) and Mechell Community Council have raised concerns about the hours of working of the SPC workforce and the health and safety implications of what they consider to be long hours of working. This matter is addressed in Appendix 3 to this letter, as it is not strictly a matter for the ES Addendum.

Public representations received on the Application

Horizon received 62 letters of representation from members of the general public following consultation on the Application. Horizon's responses to matters raised in these representations are set out in Appendix 3 to this letter.

² Principally: IACC, NRW, Gwynedd Archaeological Planning Service, North Wales Wildlife Trust, National Trust, Magnox, Welsh Government, RSPB, Office for Nuclear Regulation, North Wales Police, North Wales Fire & Rescue Service, Wales & West Utilities, Dwr Cymru Welsh Water, North Anglesey Partnership, Llanbadrig Community Council, Mechell Community Council, and Cylch Y Garn Community Council

Content of the Submission

The information submitted with this letter should be read in conjunction with the November 2017 planning application and is generally supplementary to that previously submitted. The exceptions are in the case of several of the planning application drawings, several of the ES figures (originally included in Volume 2 of the ES) and the Community Impact Report. A comprehensive schedule of submitted documents (including those that have been deleted) is included at Appendix 1.

Copies of the following have been submitted:

- This covering letter (in Welsh and English);
- Response to Regulation 22 Request;
- Revised Planning Application Form (in Welsh and English);
- Revised planning application drawings;
- ES Addendum;
- Environmental Statement Volume 2 Replacement Figures;
- Environmental Statement Volume 3 Additional Appendices;
- RIHRA Addendum; and
- Revised Community Impact Report (in Welsh and English).

All of the documents submitted can be accessed on Horizon's website at <http://www.horizonnuclearpower.com/>. Additional copies of the application documents are available to members of the public (and other stakeholders) upon request at cost price incurred for printing. Digital copies of the full application (on CD or USB) are available without charge. All requests should be made using the contact details on this letter or via email on wylfaenquiries@horizonnuclearpower.com.

Conclusion

Horizon has considered the additional information sought by IACC in the Reg 22 Letter, and all other comments made by statutory and non-statutory consultees on the Application.

The additional suite of information now provided supplements the previously submitted Application. Together this constitutes a detailed and thorough planning application that establishes the extent of the SPC Proposals. In the event that planning permission is granted, the information included within the documents will be complemented by appropriate planning conditions and planning obligations.

This combination of the proposed effective management of the site and the delivery of important "pilot" schemes that will act as the precursor to a comprehensive package of mitigation for the DCO consent will ensure that the implementation of the SPC Proposals is recognised as the

commencement of the development of the Wylfa Newydd Project. The significance of this approach is reflected in the submitted documents and the conclusion that is drawn from those is that planning permission should be granted.

Yours sincerely



Kieran Somers

Head of Planning

Horizon Nuclear Power

Appendix 1: Revised Description of Development

Application ref: 38C310F/EIA/ECON

“Site preparation and clearance works for development of the Wylfa Newydd power station comprising the following activities: site clearance (including vegetation clearance and management, removal of fencing, walls, gates, field boundaries, existing structures (including buildings), scrub, trees, and other above ground features); site establishment works (including installation of a new crossing of the existing Magnox power station access road, formalisation of existing vehicular crossing points across Cemlyn Road, formalisation of vehicular routing, installation of construction fencing around the perimeter of the site, establishment of laydown areas, material storage compounds, construction compounds and associated temporary office/welfare buildings, car parks, associated footpath link from between main site compound to the former Wylfa Sports and Social Club car park, fuel store, security fencing, drainage and security features); ground improvement works (including establishment of a remediation processing compound and associated fencing, storage of treated/processed material, establishment of associated access tracks, drainage, excavation and treatment of soils likely to be contaminated, and treatment and removal of invasive non-native species); temporary diversion and/or closure of Cemlyn Road with controlled access to Ty Croes (Fisherman’s Car Park); other associated works; and a scheme of restoration to return the site to an acceptable condition in the event the Wylfa Newydd power station development does not proceed”.

Appendix 2: Schedule of Submitted Documents

Application ref: 38C310F/EIA/ECON

November 2017 submission:

- Covering letter dated 9th November 2017 (in Welsh and English);
- Planning Application Form (in Welsh and English);
- Landowner/Agricultural Tenant Notices;
- Planning application drawings (see schedule below);
- Planning Statement;
- Pre-application Consultation Report (in Welsh and English);
- Design & Access Statement (in Welsh and English);
- Environmental Statement Non-Technical Summary (in Welsh and English);
- Environmental Statement Volume 1;
- Environmental Statement Volume 2 (Figures);
- Environmental Statement Volume 3 (Appendices);
- Rapid Health Impact Assessment Screening Statement;
- Transport Statement;
- Welsh Language Impact Assessment (in Welsh and English);
- Report to Inform Habitat Regulations Assessment Screening;
- Code of Construction Practice; and
- Glossary and Abbreviations.

May 2018 Submission:

- This covering letter (in Welsh and English) including amended Description of Development;
- Response to Regulation 22 Request;
- Planning application drawings (see schedule below)
- Environmental Statement Addendum;
- Environmental Statement Addendum Volume 2: Replacement Figures (see contents page for details);
- Environmental Statement Addendum Volume 3: Additional Appendices (see contents page for details);
- Addendum Report to Inform Habitat Regulations Assessment Screening for SPC; and
- Revised Community Impact Report (in Welsh and English).

Schedule of Submitted Drawings:

Drawing No.	Title	Date	Scale	Paper size
WN0903-JAC-OS-DRG-00001 Rev1	Site Location Plan	May 2018	1:5000	A0
WN0903-JAC-OS-DRG-00002	Existing Site Plan	Nov 2017	1:5000	A0
WN0903-JAC-OS-DRG-00003	Existing Public Rights of Way	Nov 2017	1:5000	A0
WN0903-JAC-OS-DRG-00004 Rev1	Proposed Site Plan (Following Completion of SPC Works)	April 2018	1:5000	A0
There is no Drawing WN0903-JAC-OS-DRG-00005				
WN0903-JAC-OS-DRG-00006	Existing Cemlyn Road Crossing Layout	Nov 2017	As shown	A1
There is no Drawing WN0903-JAC-OS-DRG-00007				
WN0903-JAC-OS-DRG-00008	Proposed Main Site Compound Layout (Phase A)	Nov 2017	1:500	A1
WN0903-JAC-OS-DRG-00009	Proposed Site Plan: Phase F	Nov 2017	1:5000	A0
WN0903-JAC-OS-DRG-00010	Proposed Existing Power Station Road Crossing (Phase F)	Nov 2017	1:200	A1
WN0903-JAC-OS-DRG-00011	Proposed Cemlyn Road Crossing (Phase F)	Nov 2017	1:500	A1
WN0903-JAC-OS-DRG-00012	Proposed Site Plan: Phase G	Nov 2017	1:5000	A0
WN0903-JAC-OS-DRG-00013	Proposed Remediation Processing Compound Layout (Phase G)	Nov 2017	1:500	A1
WN0903-JAC-OS-DRG-00014 Rev1	Proposed Site Plan Layout: Phase E	April 2018	1:5000	A0
WN0903-JAC-OS-DRG-00015 Rev1	Proposed Satellite Compound 1 Layout (Phase E)	April 2018	1:200	A1
WN0903-JAC-OS-DRG-00016	Proposed Satellite Compound 2 Layout (Phase E)	Nov 2017	1:200	A1
WN0903-JAC-OS-DRG-00017	Proposed Satellite Compound 3 Layout (Phase E)	Nov 2017	1:200	A1
WN0903-JAC-OS-DRG-00018	Proposed Compound 4 Layout (Phase E)	Nov 2017	1:200	A1
WN0903-JAC-OS-DRG-00019	Proposed Compound 5 Layout (Phase E)	Nov 2017	1:200	A1
WN0903-JAC-OS-DRG-00020	Proposed Compound 6 Layout (Phase E)	Nov 2017	1:200	A1
WN0903-JAC-OS-DRG-00021	Proposed Compound 7 Layout (Phase E)	Nov 2017	1:200	A1
WN0903-JAC-OS-DRG-00022	Proposed Compound 8 Layout (Phase E)	Nov 2017	1:200	A1
WN0903-JAC-OS-DRG-00023	Proposed Compound 9 Layout (Phase E)	Nov 2017	1:200	A1
WN0903-JAC-OS-DRG-00024	Proposed Compound 10 Layout (Phase E)	Nov 2017	1:200	A1
WN0903-JAC-OS-DRG-00025 Rev1	Proposed Site Plan: Phase B	April 2018	1:5000	A0
WN0903-JAC-OS-DRG-00026	Proposed Site Plan: Phase D	Nov 2017	1:5000	A0
WN0903-JAC-OS-DRG-00027	Proposed Afon Cafnan Tributary Diversion Plan and Section (Phase D)		As shown	A1
There is no Drawing WN0903-JAC-OS-DRG-00028				

WN0903-JAC-OS-DRG-00029 Rev2	Proposed Site Plan: Phase C	April 2018	1:5000	A0
WN0903-JAC-OS-DRG-00030 Rev1	Proposed Temporary Construction Fencing	April 2018	As shown	A3
There is no Drawing WN0903-JAC-OS-DRG-00031				
WN0903-JAC-OS-DRG-00032 Rev1	Proposed CPNI Fencing	April 2018	As shown	A3
WN0903-JAC-OS-DRG-00033	Proposed 0.9m High Temporary Internal Boundary Fencing Elevation and Section	Nov 2017	As shown	A3
WN0903-JAC-OS-DRG-00034 Rev2	Landscape Restoration Principles	April 2018	1:5000	A0
There is no Drawing WN0903-JAC-OS-DRG-00035				
WN0903-JAC-OS-DRG-00036 Rev3	Tree Removals / Retentions Plan Inset 1	April 2018	1:2500	A1
There is no Drawing WN0903-JAC-OS-DRG-00037				
WN0903-JAC-OS-DRG-00038 Rev2	Tree Removals / Retentions Plan Inset 2	April 2018	1:2500	A1
WN0903-JAC-OS-DRG-00039 Rev2	Tree Removals / Retentions Plan / Horizon Owned / Leased Land Key Plan	April 2018	1:5000	A0
WN0903-JAC-OS-DRG-00040 Rev1	Tree Removals / Retentions Plan / Horizon Option Land Key Plan	April 2018	1:5000	A1
WN0903-JAC-OS-DRG-00041 Rev1	Tree Removals / Retentions Plan / Horizon Option Land Inset 1	April 2018	1:5000	A1
WN0903-JAC-OS-DRG-00042 Rev1	Tree Removals / Retentions Plan / Horizon Option Land Inset 2	April 2018	1:5000	A1
WN0903-JAC-OS-DRG-00043 Rev2	Tree Removals / Retentions Plan Inset 3	April 2018	1:2500	A1
WN0903-JAC-OS-DRG-00044 Rev2	Tree Removals / Retentions Plan Inset 4	April 2018	1:2500	A1
WN0903-JAC-OS-DRG-00045	Topography Drawing		1:5000	A0
60PO8028_LSC_D-00025	Arboricultural Survey	April 2018	1:5000	A0

Appendix 3: Responses regarding health and safety and to public representations

1. Response regarding health and safety matters

The North Anglesey Partnership (a consortium of six Community Councils from the north of Anglesey) and Mechell Community Council have raised concerns about the hours of working of the SPC workforce and the health and safety implications of what they consider to be long hours of working.

Safety is a fundamental guiding principle of Horizon and central to everything that it does. It prioritises the safety, security and well-being of the public, employees, the environment and stakeholders, including those acting on its behalf to implement projects.

The hours of site operation are set out in the Application, and no adverse comments have been received in respect of those. Should permission be granted, these hours will be established by an appropriately worded planning condition. It is noted that the proposed hours are similar to those conditioned extensively within the planning system, and to those applied within the construction industry.

Horizon will work with the contractors (once appointed) for the SPC Proposals to ensure that, where practicable, that the number of vehicle journeys is minimised to reduce traffic and potential for fatigue. Horizon and its contractors work to robust systems that manage performance including relevant considerations for the health and wellbeing of its workers.

All work will be conducted in line with the requirements of the Working Time Regulations 1998 which place a restriction on the average hours worked over a stated period.

2. Public representations received on the Application

Horizon received 62 letters of representation from members of the general public following consultation on the Application. Horizon's responses to matters raised in these representations are set out below

Timing of the Application

Objection is raised to the pre-emptive nature of the Application given the uncertainties of the project and the resulting irreparable damage to the landscape in advance of any consent for the proposed power station. The Application is also considered to be premature as the final design of the Power Station could lead to a reduced area of land to be cleared being required.

Associated issues raised included prematurity in advance of confirmation of how the generated power will be transmitted across Anglesey, whether funding for the construction capital from public and private sector investors is in place, as well as the outcome of negotiations on the level of the strike price have been secured. Concern has also been raised about the delivery of other power stations within the UK.

Horizon's response to these matters is that the Application has been prepared and submitted in general accordance with prevailing UK, Welsh and local policy in respect of applications of this nature. The Application has been designed in order to ensure that appropriate site preparation works can be undertaken in order to reduce the overall construction timescale of the Project. The SPC Proposals set out are proportionate to the intended outcomes of ensuring that sufficient works are undertaken to secure this aim and a similarly proportionate restoration scheme can be implemented in the event that the Project does not proceed.

Technology Alternatives

A number of concerns have been raised in respect of the principle of nuclear energy and the technology proposed. Significant support is raised for renewable energies such as wind, wave or tidal power.

The principle of (and urgent need for) nuclear energy is established in UK Government policy. The Application has been submitted to enable the first phase of the Project to commence at Wylfa Newydd. The issues raised are not directly relevant to the planning application under consideration.

Welsh Language and Culture

It is considered that the SPC Proposals would have a detrimental impact on the linguistic, cultural, social qualities of the Isle of Anglesey. There are concerns over the number of workers needed to relocate to the area to undertake the works and the impact this would have on Welsh language and culture.

Horizon has maintained a longstanding commitment to the Welsh language both internally within the Company and in its dealings with stakeholders, communities and contractors. In respect of the Application, the preferred contractors are based in north Wales, and implement their own Welsh language policy, and are committed to working with Horizon to ensure that the Welsh language permeates all of its dealings on the SPC site.

Recent work undertaken by the preferred contractor for Horizon has demonstrated that some three-quarters of its work force live within the "LL" postcode and that 70% are Welsh speakers. These proportions are expected to remain broadly similar for the SPC Proposals.

Notwithstanding this, Horizon has also undertaken to secure, through the s106 Agreement to implement a Welsh Language Scheme that will include establishment of monitoring protocols to measure the effectiveness of the proposed planning obligations.

Scale and Impact

Objection has been raised to the planning application due to the size of the site, its impact on ecologically sensitive sites, and on Public Rights of Way.

Horizon has worked extensively to ensure that the SPC Proposals have been carefully designed to ensure that the measures proposed are kept to a minimum at this stage in the Project. The extent of the site is determined by the area of the proposed Power Station and its ancillary elements.

The design has also sought to ensure that the more significant ecological features, such as the Tre'r Gof Site of Special Scientific Interest and the ancient woodland on site are not compromised as part of the SPC Proposals. A similar approach is taken to Cestyll Gardens for the purposes of the Application. The clearance of the site and disturbance to protected species is an inevitability of the proposed development, and the mitigation measures proposed on land to the west of the site, and at Wylfa Head, will ensure that appropriate mitigation measures can be prepared and implemented in advance of the more intrusive DCO Project in the event that it is undertaken.

With regards to Public Rights of Way the SPC Proposals do not involve the closure or diversion of rights of way, except for short periods of time during the demolition of properties.

Landscape

There are concerns that the historic landscape that supports biodiversity, including protected species, would be lost and that no form of restoration would be able to replace it as it would be superficial in nature. The potential for the proposed restoration scheme to restore the site is challenged given the scale and nature of the proposed works.

Horizon is committed to ensuring that the effects on the landscape and the historic landscape are minimised as a result of the SPC Proposals. The design of the development, the proposed management regime and the retention of Cestyll Gardens and the ancient woodland on site at this stage are measures intended to minimise the impacts on the site. This approach ensures that in the event that the DCO Project does not proceed, the key features of the historic landscape will be retained and will form an integral part of the proposed restoration scheme, which will be secured by means of the s106 Agreement.

Ecology

Specific ecological concerns have been raised over the adequacy of the fungal surveys submitted with the Application as well as the impact of the SPC Proposals on the local chough population. It is emphasised that it must be ensured that the sensitivity of the ecological sites impacted upon by the development are fully protected during both the construction and operational phases of the development.

Horizon commissioned further fungi survey work in autumn 2017 and the data were assessed alongside previous survey data from 2012, 2013 and 2016. This is now available in Appendix 14-26 to the ES Addendum document. The updated survey report identifies three areas considered to be nationally important (Areas 1-3) and three areas considered to be regionally important (Areas 4-6) with regard to their waxcap (*Hygrocybe* spp.) conservation value. It was concluded that fungi should be scoped in as a receptor for the SPC Proposals.

Of these six important fungi areas, Area 5 is the only one that would be affected by the SPC Proposals, as it is the only area that overlaps with the proposed contaminated land remediation works area and therefore habitat loss could occur. However, it is considered the fungi population should be valued as high, based on the areas of national and regional importance in the study area as a whole. The loss of Area 5 (2.5ha), would represent 10.7% of the total area of nationally and regionally important areas in the study area. This is predicted to be a small magnitude of change. A minor adverse effect is therefore predicted which would not be significant and would not require mitigation.

The November 2017 SPC Environmental Statement concluded that impacts on chough would be negligible based on the following conclusions:

- nesting site and core foraging habitat at Wylfa Head is outside the SPC Application Site;
- chough foraging habitats within the SPC Application Site would not be lost; and
- SPC activities are assessed as having no greater potential to disturb chough than typical agricultural activities.

The conclusion has been reached in the ES and the ES Addendum that the measures of design, mitigation and operational control associated with the SPC Proposals are such that sensitive ecological sites within the application area will not be adversely compromised. Furthermore, the

proposed management plan for Arfordir Mynydd y Wylfa – Trwyn Penrhyn includes, within its objectives, the maintenance of habitat suitable for choughs.

Hydrology

There are concerns that the proposed works may adversely impact groundwater and surface water drainage in the surrounding area.

The Application includes assessments that conclude that there will be no adverse impact on groundwater and surface water drainage within the Application site or in the surrounding area. The effective management of features such as the Main Site Compound and the Remediation Compound will ensure that there will be no adverse effects from these elements of the SPC Proposals. The magnitude of the remainder of the proposed works and their non-intrusive nature is such that there will be no adverse effects on the water environment.

Health and Wellbeing

It is considered that the proposed works would disturb the health and wellbeing of people and wildlife in the vicinity as a result of noise, dust and other intrusions. There are concerns that the wider project would result in a legacy of radioactive wastes for future generations, posing environmental and health risks. Specifically, it is felt that the proposals would have a detrimental impact on those who already suffer from mobility issues and ill health due to the increased traffic and noise and there are concerns over the safety and health implications of nuclear power technology and its impacts on Anglesey's inhabitants.

Horizon has considered the health and wellbeing aspects of this Application in accordance with existing and emerging Welsh and local policies, and with reference to accepted best practice in the construction industry. The conclusion has been reached that in respect of the SPC Proposals, and the requirement to establish clear and enforceable management and monitoring measures, there will be no adverse impacts on people or wildlife as a result of noise or dust. This Application is not sought for matters associated with nuclear technology and the longer-term use of the site.

The Transport Statement has established that the number of vehicles associated with the SPC Proposals is such that the existing road network will not be adversely impacted.

Planning Process

Several objectors have requested that the decision on the Application is deferred to an independent Planning Inspector and that a planning inquiry should be held. There are also requests for the Welsh Government to call in the application.

Horizon considers that the decision on the Application should be taken locally. The Application accords with the principles of UK, Welsh and local policies and does not raise issues of more than local concern. In this respect, the local communities in the north of Anglesey have sought to be reassured that the SPC Proposals can be undertaken in an appropriate manner and be managed effectively by IACC and other relevant stakeholders. The imposition and enforcement of appropriate planning conditions by IACC in conjunction with Horizon and the appointed contractor represents an important element of the SPC Proposals.

In addition, the "pilot" services intended to be set out in the accompanying planning obligation will ensure that local initiatives can begin to be implemented that will have short-term and longer-term benefits. Horizon believes that local control over the terms of this agreement is paramount towards serving the communities of Anglesey, and those in the north in particular.

Appendix 4 - Planning Obligations

1. Draft Planning Obligations

Horizon is continuing negotiations with the IACC about the content of a s106 planning obligation agreement in the event that planning permission is granted. This is likely to include both planning and non-planning obligations, the latter being matters that will not be taken into account in making a decision on the application.

The terms of this agreement are still to be finalised, but are anticipated to include (but are not necessarily limited to) the following matters.

- i. Local Facilities Contribution – a financial contribution to facilitate development and provision of meeting facilities in the local community.
- ii. Tourism Development Contribution – a financial contribution to develop a programme for marketing of events which promote the marketing of Anglesey as a holiday and tourism destination, focusing on events in the vicinity of the site.
- iii. Welsh Language and Culture – the provision of Welsh Language materials to the workforce and establishment of a Welsh Language Scheme.
- iv. SPC Employment and Skills Service – a commitment to maintain involvement in the Wylfa Newydd Employment and Skills Service for the duration of the development and to provide resource plans for the development.
- v. SPC Supply Chain Service Working Group – the establishment of a Working Group in order to maximise opportunities and associated services in north Wales during the Development, to provide a central information and coordination point; commitment to strengthening and improving the resilience of the Supply Chain and to share information on best practice and lessons learned.
- vi. Empty Houses Contribution – a financial contribution towards the IACC scheme for the redevelopment/sale of empty properties in need of renovation.
- vii. Community Resilience Contribution – a financial contribution towards precautionary and necessary mitigation to address unforeseen adverse effects and/or to enhance or capture the potential benefits arising from the development including in the following areas: Welsh language, highways safety/traffic management (potential road upgrades, traffic calming, signage, etc), community groups, emergency services and tourism;
- viii. Landscape Restoration - the provision of security in respect of the restoration works for the site in the event that the Wylfa Newydd DCO Project does not proceed.
- ix. Wylfa Head Management Plan – the provision and implementation of a management plan for Wylfa Head which will cover: opportunities to maximise foraging opportunities for breeding chough; support for the existing populations of adder and common lizard; the retention and enhancement of botanical and fungal diversity; and the need to avoid the spread of injurious weeds and invasive non-native species, for the duration of the Development.
- x. SPC Noise Survey Scheme – the opening up of a noise survey scheme to enable early assessments and offers of works for certain properties located in areas which may be affected by works undertaken under the DCO.

- xi. Public Rights of Way Contribution – a financial contribution towards providing and maintaining measures to enhance the experience related to use of public rights of way and local beaches in the vicinity of the Development.

The terms of the planning obligation will continue to be developed prior to the determination of the Application.