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WYLFA NEWYDD

ENERGY WORKING FOR BRITAIN

Wylfa Newydd Project
Site Preparation and Clearance

Regulation 22 Request for Further Information – Statement in Response

ADDITIONAL INFORMATION May 2018

11. HNP SITE PREP & CLEAR APP (REG 22) A4 PORTRAIT + SPINE (ENG)_V1.indd 1 18/05/2018

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Appendix 1 Regulation 22 Request Letter from the Isle of Anglesey County Council dated 9th February 2018.

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1 Introduction

1.1 Background

1.1.1 A planning application (ref.38C310F/EIA/ECON) made by Horizon in respect of the Site Preparation and Clearance Proposals (SPC Proposals) on land adjacent to the Existing Power Station at Wylfa Head, west of Cemaes, Anglesey was submitted in November 2017 to the Isle of Anglesey County Council (IACC).

1.1.2 Following the submission of the application a consultation process was undertaken to garner the views of statutory and non-statutory consultees.

1.1.3 In accordance with the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (DMPO) the IACC undertook a formal consultation exercise for the planning application accompanied by the Environmental Statement. This required the planning authority to publicise the application by undertaking the following activities:

- the display of an appropriate Notice in at least one place on or near the land to which the application relates, for not less than 21 days; and
- the publication of the Notice in a newspaper circulating in the locality in which the land to which the application relates is situated.

1.1.4 The IACC undertook these requirements between 22 November 2017 and 2 January 2018.

1.1.5 The IACC also undertook formal consultation with prescribed consultees as identified in Schedule 4 of the DMPO.

1.1.6 As a result of that process, the IACC issued a Regulation 22 Request (dated 9th February 2018) for additional information in accordance with the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2016, which enable the planning authority to request additional information that is required in order for it to determine a planning application. The Regulation 22 Request is included as Appendix 1 to this document for reference purposes.

Work Undertaken

1.1.7 The information contained in this Statement and its appendices has been produced to respond specifically to the Regulation 22 request made by the IACC.

1.1.8 The structure of this Statement follows that of the IACC letter to provide a consistent approach to the presentation of information in response to the queries raised. Each section contains the specific IACC request followed by a Horizon response.

1.1.9 There are two substantive changes to the proposed development from that submitted with the application. These can be summarised as follows:

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- Precautionary restriction of the operation of plant and machinery on land to the west of the Afon Cafnan between March 7th and August 31st of each year that SPC works take place; and
- The removal of the diversion of the Nant Porth-y-Pistyll (Phase D) from the proposed development;

1.1.10 Of these changes the precautionary restriction of the operation of plant and machinery on land to the west of the Afon Cafnan is a direct result of issues raised in the Regulation 22 Request.

1.1.11 Further clarity has also been provided for a number of topic areas in response to the Regulation 22 Request and for the avoidance of doubt. Where consultees have raised similar or related concerns to those raised by IACC further additional information has been provided here as necessary, to ensure a comprehensive response. These changes are outlined in more detail in the respective chapters below.

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2 Environmental Impact Assessment (EIA)

2.1 Environmental Statement Addendum

IACC Request

2.1.2 *As has been previously advised, the Council, as Local Planning Authority, consider the Application to form a first phase of the overall Wylfa Newydd project. This is also the approach underpinning the justification made for the proposed works within the Application. The Planning Statement submitted as part of the application expressly states that "The SPC Proposals represent the initial development element of the Wylfa Newydd project" and are "preparatory activities and works to facilitate the construction of the power Station". In addition, given that Horizon are also including the site preparation and clearance works within the DCO application, these works form a part of the overall DCO project and must be considered and assessed within that context.*

2.1.3 *The Council, therefore, do not consider that the information set out by Horizon to date is sufficient and further environmental information is required to allow it properly to consider the planning application. In this regard, information is required on the intra-project effects, in particular those created by the SPC and main construction, and the intra-project effects together with the cumulative effects with other projects. At this time the information is inadequate and, in the case of total cumulative effects including intra-project effects, these cannot be located at all.*

2.1.4 *In addition to this, further information is sought across a number of topics. Please see the attached annex for a complete list of all of the additional further environmental information required.*

HNP Response

2.1.5 An Environmental Statement Addendum 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.

2.1.6 The structure of the Addendum follows that of the Environmental Statement to provide a consistent approach to the presentation of information. The Addendum is part of a suite of documents, outlined within the cover letter, submitted to the IACC to further supplement the SPC Works Application, and should be read in conjunction with this Statement.

2.1.7 Horizon has endeavoured, in both documents, to address the matters raised by the IACC, and other consultees, in relation to the EIA. Horizon's response is provided within the specific topic areas outlined below. With regard to the specific issues raised within the IACC's Regulation 22 letter Horizon's response is provided within the topic area chapters detailed below.

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3 Habitats Regulation Assessment (HRA) matters

3.1 Habitats Regulation Assessment (HRA)

IACC Request

3.1.2 *Consultees, including internal IACC consultees, have raised a number of points which are fundamental to whether a robust HRA decision can be taken now. Further information is accordingly sought on a number of points which are listed in the attached Annex.*

3.1.3 *In addition to the specific information requests, the Planning Authority requires further detail on the in-combination effects with the other Wylfa elements and other projects. Horizon have submitted that "given the extremely limited potential of the SPC Proposals to contribute to LSEs from effects acting alone, it is also considered that there is no potential for the effects to contribute to LSEs when acting in combination with any other plans or project"6. It is not considered appropriate to scope out all intra-project and cumulative assessment, particularly given the potential to contribute to the effects of the main consenting which will largely overlap spatially, extend the period of effects and potentially effect the same designated sites ' objectives as the Application works.*

3.1.4 *Until the information identified in the Annex is provided and is sufficient to address the points of doubt currently noted, or, where following provision of some information further information is considered by the IACC to be necessary, the Council will have no option but to proceed to undertake an Appropriate Assessment as, at this time, likely significant effects cannot reasonably be ruled out.*

HNP Response

3.1.5 Following receipt of the Regulation 22 request an *Addendum to the Report to Inform Habitats Regulations Assessment Screening for SPC* (RIHRA Addendum) has been produced to supplement the submitted *Report to Inform Habitats Regulations Assessment Screening for SPC* (November 2017) with relevant amendments identified, where applicable, in response to the Regulation 22 request and other comments made on the application.

3.1.6 The structure of the RIHRA Addendum follows that of the Habitats Regulation Assessment Screening report to provide a consistent approach to the presentation of information. The RIHRA Addendum is part of a suite of documents submitted to the IACC to further supplement the SPC Application.

3.1.7 Horizon maintains that there is no requirement for in-combination assessment. Project changes have been made to strengthen this argument (restriction of the operation of plant and machinery on land west of the Afon Cafnan during the tern nesting season) and additional information has been provided in the ES Addendum.

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3.1.8 Horizon has endeavoured to address the matters raised by the IACC and other consultees in relation to the HRA. With regard to the specific HRA issues raised within the IACC's Regulation 22 Request Horizon's response is provided within the topic area chapters detailed below.

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4 Intra-Project Information

4.1 IACC request

4.1.1 *The purpose of the Site Preparation and Clearance (SPC) proposals is to prepare the Wylfa Newydd Development Area to facilitate the construction activities authorised by the Development Consent Order (DCO). It is therefore the first phase of the overall Wylfa project. Information is therefore required on the intra-project effects (in particular those created by the SPC and main construction) and the intra-project effects together with the cumulative effects of other projects. As part of this, the following specific information has been identified as required:*

a) Air Quality information on predicted emissions for other relevant developments (including DCO proposals) to be provided to demonstrate whether the emissions from the SPC Works have the potential to have significant effects cumulatively or in-combination

b) Flood Risk information on the modelled outputs which consider pre- and post-development scenarios (shown as changes (increases / decreases) in flood depth) and details of any required floodplain storage.

c) In combination/cumulative impacts of SPC and DCO application effects on terns.

d) Additional information/assessment of the impact on terns including proposed mitigation measures to demonstrate no or imperceptible effects due to disturbance on the tern species of the SPA.

e) Set up specifications for species receptor sites.

f) A cumulative impact assessment for chough.

g) An assessment of functional linkage of breeding chough contribution to Holy Island Coast SPA breeding colony.

h) Information/assessment of the impacts on foraging black-headed gulls

i) Information/assessment on predator displacement.

4.2 HNP response

4.2.1 From the outset of the preparation of the SPC application it has always been Horizon's intention that the SPC Works would precede those of the Project proposed within the DCO submission in order to deliver the most efficient and effective construction programme. Notwithstanding this approach, the SPC Environmental Impact Assessment (EIA) considers a worst-case scenario where any effects with potential temporal and spatial overlap were considered fully. This accords with best practice in respect of EIA Regulations.

4.2.2 When considering the predicted effects of the SPC Works, and each of the other individual developments within the Project, it should be noted that upon submission of the SPC application a limited temporal overlap between the SPC

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Works and works associated with the Main Power Station Site and other elements of the wider Wylfa Newydd Project was reported within the ES. Specifically, it was determined that the only remaining SPC activities that may be undertaken alongside the DCO Works would be the re-alignment of the watercourse to the south of the SPC Application Site, and the demobilisation of the SPC contractor (removal of compounds etc). The assessment was undertaken and submitted on a worse-case scenario basis under the premise that the DCO application was submitted in August 2017 and that the 15-month SPC programme would not be completed in advance of the commencement of works of the wider DCO project.

4.2.3 Following design changes to the SPC Works the parameters under which the cumulative assessment was originally undertaken have changed and can be summarised as follows:

- The removal of the watercourse realignment from the SPC Works now reduces the overall programme from 15 to 13 months, as outlined in Chapter 3 of the ES Addendum;
- The DCO application has not been made at the time of the submission of this information; and
- The best-case programme for the submission, consideration of and determination of the DCO application followed by the discharge of any pre-commencement requirements would be a minimum of 22 months(taking into account the acceptance and pre-examination period; the statutory timeframes for examination and post-examination; the nature and complexity of the project; and any pre-commencement requirements).

4.2.4 Given the shorter SPC programme and the best-case DCO programme it is suggested that the SPC Works now achieve a temporal separation with works proposed under the DCO. This is the still the case even when considering a conservative six-month programme for the discharge of SPC Pre-commencement conditions. It is therefore reasonable to conclude that a temporal link between substantive SPC Works and the Wylfa Newydd Project would not exist.

4.2.5 As was outlined in Chapter 19 of the ES for cumulative effects to occur, there must be both temporal and spatial links with the effects of SPC. Therefore, the wider effects arising from Wylfa Newydd Project developments could now be excluded from the cumulative effects assessment because they no longer have such links. Such wider effects will all be reported in the Wylfa Newydd Project Environmental Statement, which will be submitted with the DCO application, and which includes the SPC Works as an integral part of the Project, to be implemented in the event that the SPC planning application fails

4.2.6 It is necessary to limit the assessment in this SPC Environmental Statement to the effects that are contributed to by the works for which planning permission is being sought. This is because the planning application requires the local

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planning authority to consider this application on its own merits, and to be able to impose planning conditions that can be implemented within the scope of the development. The Environmental Statement that will accompany the DCO application will include mitigation measures that can be enforced by the IACC as requirements of the DCO. The DCO Environmental Statement will include full consideration of all adverse and beneficial cumulative effects, including the economic opportunities that the Wylfa Newydd Project would bring to Anglesey.

4.2.7 Notwithstanding the above, in the unlikely event that there is some temporal overlap with the DCO Works, it is probable that this will only relate to the demobilisation of the SPC contractor. If, however, this does occur, as was highlighted within Chapter 19 of the original ES, the more significant contribution to the effect would come from the Power Station, other on-site development, Marine Works and the Site Campus within the Wylfa Newydd Development Area, and therefore it is appropriate for most of the mitigation for those effects to be set out in the Wylfa Newydd Project Environmental Statement and to be secured via requirements of the DCO. Conversely, it is suggested that it would therefore be inappropriate to attribute mitigation to the SPC Works where their contribution to any effect would not be considered significant or, when considered in terms of inter-project effects, not accountable for breaching any recognised thresholds when considered alongside all Reasonably Foreseeable Projects(RFPs).

4.2.8 Notwithstanding Horizon's position, outlined above, that there would be no intra-project effects with the DCO Project, the following additional information (i.e. air quality; flood risk; terns etc.) is provided to support this conclusion and to further assist IACC

Air Quality

a) Air Quality information on predicted emissions for other relevant developments (including DCO proposals) to be provided to demonstrate whether the emissions from the SPC Works have the potential to have significant effects cumulatively or in-combination.

4.2.9 A technical note has been produced to address this matter and can be found at Appendix 09-05 of the Environmental Statement Addendum. The technical note concludes that based on the information on the RFPs and data provided in tables 3-1 to 3-5 for the SPC Works and DCO proposals, it is concluded that the SPC Works would not lead to damage to the Cae Gwyn SSSI, Cemlyn Bay SAC/SSSI or Tre'r Gof SSSI. As set out in chapter 9 of the SPC Environmental Statement, the predicted increases due to the SPC Works are well within the assessment criteria that would indicate the potential for any damage or harm to occur to the ecological sites. The total concentrations of NO_x and SO_2 are either well below the relevant critical levels and any increases in nitrogen or acid deposition are well within 1% of the critical load and represent increases in existing deposition of less than 1%.

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4.2.10 The other external developments would not contribute sufficiently to alter this conclusion (even if they all occurred at the same time as the SPC Works, which is highly unlikely).

4.2.11 It should be noted that the air quality effects of the DCO Project is a distinct matter, to be appropriately considered during the DCO process. Given there are no intra-project air quality effects, it is not a relevant consideration for the purposes of determining the SPC Application.

Flood Risk

b) Flood Risk information on the modelled outputs which consider pre- and post-development scenarios (shown as changes (increases / decreases) in flood depth) and details of any required floodplain storage.

4.2.12 The assessment of fluvial and pluvial flood risk presented in the Flood Consequence Assessment (FCA) is based on publicly available information from NRW in the form of fluvial and surface water flood maps and detailed hydraulic modelling undertaken by Horizon of the baseline and proposed changes as a result of the development.

4.2.13 High-resolution topographical details such as the presence of boundary walls and cloddiau are not explicitly modelled. This is true of both the NRW flood mapping, the flood mapping produced by Horizon and most if not, all hydraulic models built for flood mapping purposes; typically, because at the scale of the modelling undertaken, there is insufficient data on every feature to provide certainty on the robustness of the feature or its permeability to flow and influence therefore on flood risk. It is likely, for example that, by their very nature, cloddiau will be permeable to overland flow with very little areas of ponding located behind as a result. The effect of this is that the modelled results, to a degree, already allow for the removal of these features.

4.2.14 The hydraulic modelling undertaken by Horizon is based on detailed 1m resolution LiDAR data supported by spot surveys and checks. This resolution of digital terrain model (DTM) is sufficiently detailed to ensure that topographical changes as a result of the proposed development are reflected in changes in flood extents, flood depths, and where output points have been located in the hydraulic model, in flood flows and velocities. For clarity, all changes to site topography are included within the 'with-scheme' hydraulic model, including the proposed drainage system. As such, the results provided in appendices to the FCA are representative of the effect on flood risk of all possible changes to topography/flow paths.

4.2.15 With respect to these output points, the hydraulic modelling undertaken for the SPC Proposals includes a large number of both output points and output lines, located within and across watercourses. Outputs lines are used to present data for a wider area than output points, which provide data for a single point only.

4.2.16 The data on flood depths, flows and velocities available at each of these output points and lines, and particularly comparison of baseline and 'with-scheme'

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results, provides detail on any changes in these parameters and, because data are available at 15-minute intervals, changes in the timing of the hydrological response as a result of the proposed development. Away from these output points, flood depths and extent are mapped for a range of return period events for both the baseline and with-scheme scenarios for a range of return periods, and again comparison of the two provides an indication of the change in flood risk as a result of the development.

4.2.17 In combination, the volume of data available to identify changes in flood risk within, and the catchments containing, the SPC Proposals, including at all potential receptors, is substantial. It has been provided with the documents submitted to the IACC as evidence of the change in risk as a result of the development. The volume of data is such that reference to only a relatively small number of outputs points is necessary to evidence the changes caused by the development within the FCA (Appendix 13-04) and these points are presented as evidence of those changes.

4.2.18 Appendices to the FCA present all model outputs as well as the assessment methodology, which describes the criteria used to define the risk of flooding, which is a combination of the hazard (depth, velocity, duration etc.), the vulnerability of the land use and the probability of occurrence (return period).

4.2.19 Wherever a risk is described in the document, reference is made to each of these elements and how they are classified, so that it is clear how the conclusion of a low risk has been reached. Summary tables are presented in Section 6 of the FCA that highlight each of these classifications and the corresponding risk category for each area of the development, including off-site receptors.

4.2.20 The layout of the SPC Application Site and the proposed flood risk management measures are presented for those areas within the site that are noted as having a risk of flooding, even where it is classified as low. Management measures include the proposed drainage system to manage runoff from within the site, and adoption of a flood risk management plan, including receipt of flood warnings and operational measures to avoid areas at risk. It is considered that the information presented within the Environmental Statement, via mapped outputs and tabulated datasets from model output points, is sufficiently detailed to develop these mitigation measures such that appropriate plans will be in place to ensure no significant risk to people, plant, property or the environment.

4.2.21 With regard to off-site receptors, the conclusions of the assessment are that the overall impact of the SPC Works is low, as the IACC notes. This is based on simulations indicating that under the majority of conditions there will be no change in flood levels or a slight reduction in flood levels off-site during the development period. The exception to this is the 0.1% AEP event in which there may be an increased flood level of 0.01m. Given the short duration of the construction works the likelihood that this would occur is considered very low. The data supporting this conclusion are presented in Section 6 of the FCA, covering both fluvial and pluvial sources, and is supported by model outputs presented in appendices to the FCA.

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4.2.22 It has been noted that NRW has requested information on the effect of the watercourse realignment in isolation from the rest of the proposed landform changes introduced by the SPC Proposals. The rationale for this request is that the watercourse realignment was proposed as an early activity that may have occurred before the granting of consent to the rest of the main site development. However, subsequent amendments to the proposed development have resulted in the removal of the watercourse realignment, hence, there is now no longer a requirement to provide the information requested by NRW. It will be noted that this now means that the FCA and its supporting evidence include an activity that is no longer included. The information presented in the FCA is considered to represent a worst-case scenario with the inclusion of this activity, which it will be noted from the FCA resulted in a mixture of small localised increases and decreases in flood depth within the boundaries of the SPC Application Site. Removal of this activity is expected to result in no local changes in flood levels, which under the FCA assessment methodology would result in a negligible impact on flood risk.

In combination/cumulative impacts

c) In combination/cumulative impacts of SPC and DCO application effects on terns.

4.2.23 Horizon has committed to additional mitigation regarding the potential for disturbance to terns in that between 7 March and 15 August (when terns and/or black-headed gulls may be nesting within the Cemlyn bay lagoon) there will be no operation of plant and machinery associated with the SPC Proposals on all land to the west of Afon Cafnan.

4.2.24 A technical report has been produced which modelled the noise levels predicted from the works during the tern breeding season, including an HRA worst-case model. The model shows a reduction of the noise levels experienced by the terns from those predicted in the original application. An addendum to the HRA has also been produced that shows that the new modelled noise levels would be below ambient levels during the tern breeding season. This demonstrates that no or imperceptible effects would occur. As no effect would occur, no in-combination assessment is required in the HRA. The modelling also demonstrates that no cumulative effects would occur.

Impact on terns

d) Additional information/assessment of the impact on terns including proposed mitigation measures to demonstrate no or imperceptible effects due to disturbance on the tern species of the SPA.

4.2.25 Horizon has committed to additional mitigation regarding the potential for disturbance to terns in that between 7 March and 15 August (when terns and/or black-headed gulls may be nesting within the Cemlyn Bay lagoon) there will be no operation of plant and machinery associated with the SPC Proposals on all land to the west of Afon Cafnan.

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4.2.26 A technical report has been produced which modelled the noise levels predicted from the works during the tern breeding season, including an HRA worst-case model. The model shows a reduction of the noise levels experienced by the terns from those predicted in the original application. An addendum to the HRA has also been produced that shows that the new modelled noise levels would be below ambient levels during the tern breeding season. This demonstrates that no or imperceptible effects would occur.

Species receptor sites

e) Set up specifications for species receptor sites.

4.2.27 The details of the specifications for the mitigation areas described above are provided in Figures 14-1 and 14-12, to provide additional details regarding how habitats have been created. Details of how these sites will be managed will be provided in habitat management plans, to be secured through an appropriate planning conditions.

4.2.28 Horizon is also preparing a Wylfa Head Management Plan detailing how the Arfordir Mynydd y Wylfa – Trwyn Penrhyn Wildlife Site will be managed for the habitats and species for which it is designated. This will be secured by means of a planning obligation.

Impacts on chough

f) A cumulative impact assessment for chough.

g) An assessment of functional linkage of breeding chough contribution to Holy Island Coast SPA breeding colony.

4.2.29 The 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 (and even then, only within the SPC Application Site - not at Wylfa Head).

4.2.30 Horizon's position is that, because chough would be negligibly affected by the SPC Works, effects resulting from construction and operation of the Site Campus will therefore be assessed in isolation as part of the application for development consent for the Wylfa Newydd Project. It therefore is also unnecessary to consider bringing forward the proposed mitigation for effects arising from construction and operation of the Site Campus, into the SPC phase of the Wylfa Newydd Project. Ultimately under either application, all possible future development scenarios would conclude with restoration of habitats and landscape features within the proposed Site Campus area, either through

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implementation of the SPC Restoration Plan or the implementation of the Wylfa Newydd Project.

4.2.31 Other comments received in relation to chough and the potential for effects on populations at Holy Island SPA are therefore also discounted as no effects are predicted on the Wylfa Head pairs during SPC Works.

Impacts on foraging black-headed gulls

h) Information/assessment of the impacts on foraging black-headed gulls.

4.2.32 The SPC Environmental Statement conclusion that "*…effects (on black-headed gulls]) are predicted to be negligible as the areas of habitat where black-headed gulls were most frequently record would be retained, and would not be subject to disturbance levels that are likely to affect them*" (paragraph 14.7.115 of the SPC Environmental Statement) is based on black-headed gull data from six winters (typically October to March 2009/10 to 2014/15) of wintering bird transect surveys and one winter of targeted black-headed gull transect survey (January to March 2017), as well as five years of breeding season bird transect surveys (2010 to 2014) and one breeding season of targeted black-headed gull survey in 2017. Surveys followed recognised good practice methodologies as described by Bibby et al. (2000) and Gilbert et al. (1998). Further details on the frequency and location of surveys are provided in appendices 14-12 and 15-03 of the SPC Environmental Statement and in the updated Seabirds Baseline Report included as Appendix 14-28 of Volume 2 of this Addendum. The result of these surveys is a substantial dataset with relevant spatial coverage and sufficient temporal frequency and range to provide a representative picture of black-headed gull usage of the SPC Application Site and its environs. It is therefore concluded that the baseline data are sufficient for a robust assessment of the effects of the SPC Works on black-headed gulls.

Predator displacement

i) Information/assessment on predator displacement.

4.2.33 Surveys and desk studies to inform the SPC Environmental Statement confirmed the presence of otter and polecat within the SPC Application Site (see chapter 14 Terrestrial and freshwater ecology). Surveys indicate that the maximum number of polecat individuals known from the SPC Application Site was four and that otter was present in low numbers only. The presence of other predators such as stoat, weasel and fox within the SPC Application Site can be assumed given the nature of the habitats present. Annual site reports from the North Wales Wildlife Trust (NWWT) also confirm the presence of these species at the nearby Cemlyn Bay reserve, including instances of tern predation by otter and potentially stoat and weasel (e.g. see NWWT reports from 2011 to 2017).

4.2.34 Mustelids and other potential mammalian predators (e.g. fox and rat) may be displaced from affected areas of the SPC Application Site due to the removal of stone walls, hedgerows, trees and scrub. Theoretically, displaced mammals may increase their use of retained habitats in and around the Cemlyn Bay reserve and

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so increase the risk of predation of breeding terns and black-headed gulls (adults, eggs and chicks). The effects of predation can be significant, as was observed in 2017 following the abandonment of the tern colony following predation by otters. As such, there is a theoretical impact pathway to the Anglesey Terns SPA due to increased predation caused by predator displacement from the SPC Application Site.

4.2.35 Small mammals, notably rabbits, comprise the majority of prey for stoats, weasels and polecat (Harris & Yalden, 2008). The proposed SPC Works do not involve topsoil stripping and so existing rabbit burrows/warrens would be retained. Although the proposed SPC Works would require the above ground removal of hedgerows and scrub, the stumps and roots would be retained (i.e. they would not be grubbed out) and so would continue to provide a habitat for small mammals (e.g. voles). Furthermore, the post-works grassland sward structure would largely be consistent with the existing short-grazed sward structure and so the overall quality of habitat for small mammals would be unchanged. As such, it is considered unlikely that the proposed SPC Works would significantly reduce the abundance of small mammals within the SPC Application site and so there would not be a large-scale displacement of mammalian predators as a result of reduced prey availability.

4.2.36 Stone walls have the potential to be used as denning sites by mustelids and so their removal may lead to the displacement of these animals into adjacent habitats. However, not all potential denning sites will be removed from the SPC Application site. For example, rabbit warrens will not be affected as topsoil stripping is not proposed; stoats, weasels and polecat all make use of warrens as denning sites, with 49 to 80% of polecat dens being in these structures (Birks & Kitchener, 1999). Furthermore, the polecat records for the SPC Application Site (appendix 14-16 of Volume 3D) show that Dame Sylvia Crowe's Mound and Wylfa Head are important sites for this species; neither of these areas would be directly affected by the SPC Works and so denning sites (and foraging resource) associated with these areas would be unaffected. As such, it is considered unlikely that the proposed SPC Works would significantly reduce the abundance of denning sites within the SPC Application site and so there would not be a large-scale displacement of mammalian predators into the Cemlyn Bay reserve as a consequence.

4.2.37 The SPC Application site covers a large area and so is abutted by extensive areas of retained habitat, the majority of which is a great distance from Cemlyn Bay. Retained habitats suitable for mammalian predators include those at Dame Sylvia Crowe's Mound, Wylfa Head, Trwyn Pencarreg, existing farmland, and the newly created Notable Wildlife Enhancement Site located to the west of the SPC Application Site. It is therefore expected that any displaced mammalian predators would move into these adjacent areas where they would distribute themselves depending on available territory niches. The total area covered by Dame Sylvia Crowe's Mound and Wylfa Head alone is 26ha and so these retained sites are likely to make a significant contribution to polecat foraging requirements whilst also acting as a refuge for other displaced predators such as stoat and weasel.

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As such, it is considered unlikely that Cemlyn Bay would be the focus of displaced mammalian predators due to the wide abundance of suitable alternative habitats.

4.2.38 The Notable Wildlife Enhancement Site is an off-site enhancement area that has been secured by Horizon for the next 15 years (see figure 14-12 of the ES and the ecology and landscape management strategy in the CoCP). It is approximately 15ha and is designed to provide refuge and foraging opportunities for a wide range of species that will potentially be displaced from the SPC Application Site, including polecat and other mammalian predators. The Notable Wildlife Enhancement Area is designed principally to provide a strong corridor (in terms of cover and foraging opportunity) through which any displaced animals can move from the Wylfa Newydd Development Area and into adjacent habitats and the wider landscape. Although the Notable Wildlife Enhancement Site is principally designed to mitigate the effects associated with the Wylda Newydd Development (i.e. extensive topsoil stripping), its presence would further reduce any possible reliance that mammalian predators displaced by the proposed SPC Works might have on Cemlyn Bay as a foraging resource.

4.2.39 The tern and gull colony at Cemlyn Bay is likely to be a high-value foraging resource for mammalian predators. Polecat, stoat and weasel all have large ranges and are highly mobile meaning that Cemlyn Bay is within the theoretical range of most individuals within the SPC Application Site. Hypothetically, these individuals could already make use of Cemlyn Bay as a foraging resource and so any displacement away from the SPC Application site would not automatically lead to a net-increase in predation. Until 2017, predation by mammals has not been reported by the Cemlyn Bay wardens as being a significant issue (e.g. see NWWT reports from 2011 to 2016), although increased monitoring of predators was recommended due to an increase in otter observations in 2016 (Holton & Wilde, 2016). During 2017, disturbance and predation of breeding terns and black-headed gull, predominantly by otters, caused total failure of the breeding colony with no chicks fledged (Wilde & Wright, 2017). Based on the information contained within the wardens' reports, it is considered that predation by otters is the principal issue affecting the tern and gull colony, with only limited records of predation by other mustelids. The proposed SPC Works is predicted to result in a negligible effect to otter (see chapter 14 Terrestrial and freshwater ecology) and so displacement of this species from the SPC Application Site is not anticipated.

4.2.40 Based on the above, likely significant effects to the Anglesey Terns SPA as a result of increased predation by displaced mammalian predators are not expected.

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5 Trading Standards

5.1 IACC Request

5.1.1 *Confirmation that, while there is reference to the local petrol filling station, a proposed fuel store is also being provided.*

5.2 HNP Response

5.2.1 A proposed fuel store is being provided within the Main Site Compound. This will further reduce traffic impacts on the surrounding road network.

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6 Archaeology and Historic Environment

6.1 IACC Request

6.1.1 *Additional information is required on the mitigation measures to be used, and residual effects on Cestyll Garden Grade II Registered Historic Park and Garden (this asset was specifically noted by CADW as requiring assessment for this application). From a review of the scoping report and the CADW response, the scope of the required assessment for this asset was to cover potential effects arising from:*

- *Visual change (setting affect);*
- *Noise change (setting affect);*
- *Vibration change (setting affect);*
- *Dust and air pollutant emissions (effect on garden planting); and*
- *Water quality/flows (effect on stream running through garden).*

6.1.2 *Cestyll garden is dealt with as a 'Historic landscape type' within Chapter 17 and is identified as being of high value, reflecting its designated status.*

6.1.3 *ES Chapter 17 correctly identifies the CADW guidance on assessing effects on the setting of historic assets (CADW 2017 Setting of Historic Assets in Wales). However, the baseline description for Cestyll Garden (pages 17-36, 17-37, with a similar level of detail in page 33 of Appendix 17-01 (Volume 3F)) is brief and should provide more information with reference to the aspects identified in the guidance for Stage 2 of the assessment process.*

6.1.4 *There is no mitigation identified with respect to this asset. There is no discussion of effects on this asset, and the assessment is provided only in tabular form.*

6.1.5 *Further information is required in order to confirm the validity of this assessment. Taking each aspect of the potential effects in turn:*

- *Visual change;*
  - *What will be the extent and nature of visual intrusion*
  - *What will be the duration of this*
- *Noise change;*
  - *What will be the extent and nature of noise intrusion (e.g. how would this be experienced)*
  - *What will be the duration of this*
- *Vibration change;*
  - *Not assessed – can it be confirmed that vibration would not be experienced*
- *Dust and air pollutant emissions*
  - *What is the evidence that there will be no effect from this*

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- *Are mitigation measures (e.g. dust suppression) to be used*
- *Water quality/flows (effect on stream running through garden)*
  - *What is the evidence that there will be no effect from this*
  - *Are mitigation measures (e.g. drainage/run-off management) to be used.*

6.2 HNP Response

Visual change

6.2.2 As a consequence of the watercourse realignment being removed from the scope of the SPC Works the construction programme will be reduced from 15 months to 13 months.

6.2.3 Potential effect on Cestyll Garden (HLT 2), including potential effects resulting from visual intrusion such as construction activities resulting from SPC Works are presented in paragraphs 17.7.11 and 17.9.5 and tables 17-15 and 17-19 of chapter 17 (Cultural heritage) of the Environmental Statement.

6.2.4 Due to the presence of the shelter belt around the valley garden (which is located outside the SPC Application Site and would be retained), the orientation of the garden with a Significant View to the north-northwest away from the SPC Application Site (please refer to figure 17-19 in the Environmental Statement) and local topography, views of construction activities to the east and south would be restricted to those which take place immediately adjacent to the valley garden. Due to the shelter belt, views of these activities would also be glimpsed. While construction activities would be visible in the views from the valley garden to the south-southwest, these would be distant and, due to topography, partially screened.

6.2.5 While the Significant View from the kitchen garden and site of Cestyll House (Asset 132) is to the north-northwest, away from the SPC Application Site (please refer to figure 17-19 in the Environmental Statement), due to the more open landscape and lack of intervening vegetation, views of construction activities would be possible from both here and the Essential Setting.

6.2.6 However, there would be no physical effect on Cestyll Garden, no activities would take place within the Essential Setting, activities would not be visible in Significant Views from the valley garden or the kitchen garden and the site of Cestyll House (please refer to figure 17-19) or affect the visual relationship between the valley garden, the kitchen garden and the former site of Cestyll House (Asset 132). Based on this, and the temporary nature of the activities, the effects on Cestyll Garden have been assessed to be of Minor significance.

6.2.7 Potential visual effects on Cestyll Garden were also assessed and are presented in chapter 16 (Landscape and Visual). As noted in paragraph 16.6.8, as the Significant Views (please also refer to figure 17-19) look outwards towards the sea, there would be no views of the SPC Proposals. Due to this, and the lack of

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public access, visual receptors using these gardens were therefore scoped out of the assessment of visual effects.

Noise change

6.2.8 Potential effect on Cestyll Garden (HLT 2), including potential effects resulting noise intrusion, from the SPC activities are presented in paragraphs 17.7.11 and 17.9.5 and tables 17-15 and 17-19 of chapter 17 (Cultural heritage) of the Environmental Statement. As stated in paragraph 17.1.3, the assessment presented in chapter 17 (Cultural heritage) took into account the results of the noise assessment presented in chapter 10 (Noise and vibration). Please note that, as there are no noise-generating works scheduled to take place over months 11 to 15, contours were not prepared for these months. As noted above the as a consequence of the watercourse realignment being removed from the scope of the SPC works this 15 month period will be reduced to 13 months. This however does not affect the results of the noise assessment presented in the Environmental Statement.

6.2.9 .

6.2.10 As identified on figures 10-2 to 10-12, while the eastern extent of the Essential Setting of Cestyll Garden would experience temporary noise levels of up to 65dB LAeq, the noise levels experienced by the majority of the Essential Setting and the valley garden (where the existing tranquil noise environment contributes most significantly to the value of the heritage asset), the kitchen garden and the site of Cestyll House (Asset 132) would generally be below 60 dB LAeq. The magnitude of this effect has been assessed to be small and the significance of effect minor adverse. This is supported by paragraph 43 of MPG11 which states that a noise level of 65dB(A) represents an appropriate limit for "*open spaces which the public uses for relaxation*".

Vibration

6.2.11 The assessment presented in chapter 17 (Cultural heritage) took into account the results of the assessment presented in chapter 10 (Noise and vibration). Please refer to chapter 10 (Noise and vibration) for more information on the vibration assessment method.

6.2.12 As it is primarily rural, the Essential Setting of Cestyll Garden was not assessed to contain any buildings or structures susceptible to vibration and therefore scoped out from any further assessment of vibration effects.

6.2.13 At its closet point, the Kitchen Garden and site of Cestyll House (Asset 132) are located approximately 315m from the nearest location where a vibratory roller would be used (please refer to table 10-15 in chapter 10 (Noise) and figure Appendix A-2 in volume 3A). As they are located more than 200m from the nearest location where a vibratory roller would be used, using the method presented in chapter 10 (Noise) (see paragraph 10.4.96), the kitchen garden and site of Cestyll House (Asset 132) were scoped out from any further assessment of vibration effects.

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6.2.14 At its closet point, the Valley Garden is located 190m from the nearest location where a vibratory roller would be used (please refer to table 10-15 in chapter 10 (Noise) and figure Appendix A-2 in volume 3A). Based on the method presented in chapter 10 (Noise) (please refer to table 10-22), the peak particle velocity mm/s is predicted to be <1.0mm/s. Based on this, the magnitude of impact has been assessed to be negligible and the significance of effect negligible.

Dust and air pollutant emissions

6.2.15 The predicted maximum oxides of nitrogen (NOx) and sulphur dioxide (SO2) concentrations at Cestyll Garden are shown in the table below.

Predicted maximum NOx and SO2 concentrations at Cestyll Garden

Pollutant	Averaging period	Critical level (CLE) (µg/m^3)	PC (µg/m^3)	PEC (µg/m^3)	PC/CLE (%)	PEC/CLE (%)	Further consideration required?
NOx	Annual mean	30	0.33	6.00	1%	20%	No
	Maximum 24-hour mean	200	8.39	19.71	4%	10%	No
SO_2	Annual mean	20	0.001	1.91	<0.01 %	10%	No

6.2.16 The predicted annual mean NOx and SO2 concentrations at Cestyll Garden are well below the relevant critical levels (please refer to table 9-14 in chapter 9 (Air quality) of the Environmental Statement). The predicted maximum 24-hour mean NOx concentrations were also considerably lower than the relevant critical level. The predicted concentrations are also below the criteria for identifying where further consideration would be required by ecology (see the criteria adopted for ancient woodland and Wildlife Sites in paragraph 9.4.66 in chapter 9 of the Environmental Statement).

6.2.17 The predicted nitrogen and acid deposition rates at Cestyll Garden are set out in the tables below.

Predicted maximum nutrient nitrogen deposition at Cestyll Garden

Vegetation type	Nutrient nitrogen deposition (kgN/ha/year) [1]

	Critical load (CLO)	Existing deposition	PC	PEC	PC/CLO (%)	PEC/CLO (%)
Short	**n/a**	**9.9**	**0.034**	**9.97**	**n/a**	
Tall		**16.0**	**0.067**	**16.03**		

Note 1: kgN/ha/year - Kilograms of nitrogen per hectare per year

Predicted maximum acid deposition at Cestyll Garden

Vegetation type	Acid deposition (keq/ha/year) [1]					
	CLO (CLMaxN)	Existing acid deposition (N + S)	PC	PEC	PC/ CLO (%)	PEC / CLO (%)
Short	**n/a**	**0.85**	**0.0025**	**0.85**	**n/a**	
Tall		**1.32**	**0.0050**	**1.32**		

Note 1: keq/ha/year - Kilo equivalents per hectare per year

Note 2: CLMaxN – maximum acid deposition critical load for nitrogen

6.2.18 There are no relevant nitrogen or acid critical loads available for vegetation within managed gardens such as Cestyll Garden. Therefore, it is not possible to assess the predicted increases in deposition against a critical load or the criteria set out in chapter 9 of the Environmental Statement. However, the predicted increases in acid and nitrogen deposition represent very small increases to the existing deposition rates, with the maximum increase equivalent to a 0.4% increase on existing deposition rates.

6.2.19 Due to construction lasting a relatively short period of time in the lifespan of woody species and the ability of the soil to buffer against acidification from increased nitrogen deposition, the effects of changes in air quality on woody species are likely to be limited. Such effects are most likely to manifest as enhanced growth.

6.2.20 Species such as rhododendrons and azaleas may benefit from an increase in nitrogen and acidity levels due to their preference for soils with a low pH, between 4.5 and 6.0, and these species can also survive healthily down to pH levels around 3.5 although growth rates would be likely to be slowed. The current soil pH ranges between 4.75 and 5.91 which indicates that even with the potential for soil acidification, the pH is likely to remain within a healthy range for these types of plants.

6.2.21 Due to the small increase in deposition predicted, the short duration of works and the acidic nature of the soil at Cestyll Garden, it is therefore considered highly unlikely that such small changes in nitrogen or acid deposition would affect the vegetation within the managed garden of Cestyll Garden.

6.2.22 With regard to dust emissions from the SPC Works and the application of mitigation measures, this was addressed in paragraph 4.1.15 of appendix 9-02 of the Environmental Statement which stated:

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"…Cestyll Garden (Registered Historic Park and Garden Grade II) is adjacent to the SPC Application Boundary and has been identified as having vegetation that may be sensitive to dust deposition. Although not assessed specifically in this dust assessment, as its designation relates to its cultural heritage value rather than its ecological value, the application of mitigation measures applied to reduce the risks of dust effects at the assessed ecological receptors within or adjacent to the SPC Application Site (i.e. the Tre'r Gof SSSI and Cae Gwyn SSSI) would also reduce the risk of dust effects at Cestyll Garden…"

6.2.23 The mitigation measures to prevent and control the emissions of dust with regard to the protection of vegetation at human and ecological receptors (including the vegetation within Cestyll Garden) are set out in the SPC CoCP.

Water quality/flows

6.2.24 The assessment presented in chapter 17 (Cultural heritage) took into account the results of the assessment presented in chapter 13 (Surface water and ground water).

6.2.25 As identified in paragraph 13.7.5 and 13.7.6 of chapter 13 (Surface water and ground water), the effects of changes in water quality on surface water receptors, including Afon Cafnan which runs through Cestyll Garden (HLT 2), have been assessed to be of negligible magnitude and negligible or minor significance. Based on this, no effect on Cestyll Garden is predicted from changes from water quality.

6.2.26 As identified in paragraph 13.7.7 of chapter 13 (Surface water and ground water), the significance of effect of changes in water availability on surface water receptors, including Afon Cafnan which runs through Cestyll Garden (HLT 2) has been assessed to be of negligible significance. Based on this no effect on Cestyll Garden is predicted from changes in flows.

6.2.27 As stated in 13.7.7 of chapter 13 (Surface water and ground water) as no significant effects were identified following the implementation of embedded and good practice mitigation measures (identified in paragraphs 13.4.20 and 13.4.21 of Chapter 13), and no additional mitigation measures were required.

6.3 IACC Request

6.3.1 *The impacts on Cestyll Registered Historic Park Garden (see the statutory register under the provisions of the Historic Environment Wales Act 2016) have not been properly assessed in this application. Though we note that an Assessment of the Significance has been completed (GAT report G2096 is referenced in appendix 17-01 of volume 3F of the Environmental Statement), the findings of this assessment are not presented here and the impacts of Site Preparation and Clearance (SPC) works, such as dust, noise and vehicle movements, need to be considered against this assessment.*

6.4 HNP Response

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Visual change

6.4.2 As a consequence of the watercourse realignment being removed from the scope of the SPC Works the construction programme will be reduced from 15 months to 13 months.

6.4.3 Potential effect on Cestyll Garden (HLT 2), including potential effects resulting from visual intrusion such as construction activities resulting from SPC Works are presented in paragraphs 17.7.11 and 17.9.5 and tables 17-15 and 17-19 of chapter 17 (Cultural heritage) of the Environmental Statement.

6.4.4 Due to the presence of the shelter belt around the valley garden (which is located outside the SPC Application Site and would be retained), the orientation of the garden with a Significant View to the north-northwest away from the SPC Application Site (please refer to figure 17-19 in the Environmental Statement) and local topography, views of construction activities to the east and south would be restricted to those which take place immediately adjacent to the valley garden. Due to the shelter belt, views of these activities would also be glimpsed. While construction activities would be visible in the views from the valley garden to the south-southwest, these would be distant and, due to topography, partially screened.

6.4.5 While the Significant View from the kitchen garden and site of Cestyll House (Asset 132) is to the north-northwest, away from the SPC Application Site (please refer to figure 17-19 in the Environmental Statement), due to the more open landscape and lack of intervening vegetation, views of construction activities would be possible from both here and the Essential Setting.

6.4.6 However, there would be no physical effect on Cestyll Garden, no activities would take place within the Essential Setting, activities would not be visible in Significant Views from the valley garden or the kitchen garden and the site of Cestyll House (please refer to figure 17-19) or affect the visual relationship between the valley garden, the kitchen garden and the former site of Cestyll House (Asset 132). Based on this, and the temporary nature of the activities, the effects on Cestyll Garden have been assessed to be of Minor significance.

6.4.7 Potential visual effects on Cestyll Garden were also assessed and are presented in chapter 16 (Landscape and Visual). As noted in paragraph 16.6.8, as the Significant Views (please also refer to figure 17-19) look outwards towards the sea, there would be no views of the SPC Proposals. Due to this, and the lack of public access, visual receptors using these gardens were therefore scoped out of the assessment of visual effects.

Noise change

6.4.8 Potential effect on Cestyll Garden (HLT 2), including potential effects resulting noise intrusion, from the SPC activities are presented in paragraphs 17.7.11 and 17.9.5 and tables 17-15 and 17-19 of chapter 17 (Cultural heritage) of the Environmental Statement. As stated in paragraph 17.1.3, the assessment presented in chapter 17 (Cultural heritage) took into account the results of the

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noise assessment presented in chapter 10 (Noise and vibration). This included the information presented on figures 10-2 to 10-12, which present predicted noise contours for each month of the SPC Works indicative programme. Please note that, as there are no noise-generating works were scheduled to take place over months 11 to 15, contours were not prepared for these months.

6.4.9 As identified on figures 10-2 to 10-12, while the eastern extent of the Essential Setting of Cestyll Garden would experience temporary noise levels of up to 65dB LAeq, the noise levels experienced by the majority of the Essential Setting and the valley garden (where the existing tranquil noise environment contributes most significantly to the value of the heritage asset), the kitchen garden and the site of Cestyll House (Asset 132) would generally be below 60 dB LAeq. The magnitude of this effect has been assessed to be small and the significance of effect minor adverse. This is supported by paragraph 43 of MPG11 which states that a noise level of 65dB(A) represents an appropriate limit for “open spaces which the public uses for relaxation”.

Vibration

6.4.10 The assessment presented in chapter 17 (Cultural heritage) took into account the results of the assessment presented in chapter 10 (Noise and vibration). Please refer to chapter 10 (Noise and vibration) for more information on the vibration assessment method.

6.4.11 As it is primarily rural, the Essential Setting of Cestyll Garden was not assessed to contain any buildings or structures susceptible to vibration and therefore scoped out from any further assessment of vibration effects.

6.4.12 At its closet point, the kitchen garden and site of Cestyll House (Asset 132) are located approximately 315m from the nearest location where a vibratory roller would be used (please refer to table 10-15 in chapter 10 (Noise) and figure Appendix A-2 in appendix 3A). As they are located more than 200m from the nearest location where a vibratory roller would be used, using the method presented in chapter 10 (Noise) (see paragraph 10.4.96), the kitchen garden and site of Cestyll House (Asset 132) were scoped out from any further assessment of vibration effects.

6.4.13 At its closet point, the valley garden is located 190m from the nearest location where a vibratory roller would be used (please refer to table 10-15 in chapter 10 (Noise) and figure Appendix A-2 in volume 3A of the Environmental Statement). Based on the method presented in chapter 10 (Noise) (please refer to table 10-22), the peak particle velocity mm/s is predicted to be <1.0mm/s. Based on this, the magnitude of impact has been assessed to be negligible and the significance of effect negligible.

Dust and air pollutant emissions

6.4.14 The predicted maximum oxides of nitrogen (NOx) and sulphur dioxide (SO_2) concentrations at Cestyll Garden are shown in the table below.

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Predicted maximum NO_x and SO_2 concentrations at Cestyll Garden

Pollutant	Averaging period	Critical level (CLE) (µg/m³)	PC (µg/m³)	PEC (µg/m³)	PC/CLE (%)	PEC/CLE (%)	Further consideration required?
NOx	Annual mean	30	0.33	6.00	1%	20%	No
	Maximum 24-hour mean	200	8.39	19.71	4%	10%	No
SO_2	Annual mean	20	0.001	1.91	<0.01 %	10%	No

6.4.15 The predicted annual mean NOx and SO_2 concentrations at Cestyll Garden are well below the relevant critical levels (please refer to table 9-14 in chapter 9 (Air quality) of the Environmental Statement). The predicted maximum 24-hour mean NOx concentrations were also considerably lower than the relevant critical level. The predicted concentrations are also below the criteria for identifying where further consideration would be required by ecology (see the criteria adopted for ancient woodland and Wildlife Sites in paragraph 9.4.66 in chapter 9 of the Environmental Statement).

6.4.16 The predicted nitrogen and acid deposition rates at Cestyll Garden are set out in the tables below.

Predicted maximum nutrient nitrogen deposition at Cestyll Garden

Vegetation type	Nutrient nitrogen deposition (kgN/ha/year) [1]					
	Critical load (CLO)	Existing deposition	PC	PEC	PC/CLO (%)	PEC/CLO (%)
Short	n/a	9.9	0.034	9.97	n/a	
Tall		16.0	0.067	16.03		

Note 1: kgN/ha/year - Kilograms of nitrogen per hectare per year

Predicted maximum acid deposition at Cestyll Garden

	Acid deposition (keq/ha/year) [1]

Vegetation type	CLO (CLMaxN)	Existing acid deposition (N + S)	PC	PEC	PC/ CLO (%)	PEC / CLO (%)
Short	**n/a**	**0.85**	**0.0025**	**0.85**	**n/a**	
Tall		**1.32**	**0.0050**	**1.32**		

Note 1: keq/ha/year - Kilo equivalents per hectare per year

Note 2: CLMaxN – maximum acid deposition critical load for nitrogen

6.4.17 There are no relevant nitrogen or acid critical loads available for vegetation within managed gardens such as Cestyll Garden. Therefore, it is not possible to assess the predicted increases in deposition against a critical load or the criteria set out in chapter 9 of the Environmental Statement. However, the predicted increases in acid and nitrogen deposition represent very small increases to the existing deposition rates, with the maximum increase equivalent to a 0.4% increase on existing deposition rates.

6.4.18 Due to construction lasting a relatively short period of time in the lifespan of woody species and the ability of the soil to buffer against acidification from increased nitrogen deposition, the effects of changes in air quality on woody species are likely to be limited. Such effects are most likely to manifest as enhanced growth.

6.4.19 Species such as rhododendrons and azaleas may benefit from an increase in nitrogen and acidity levels due to their preference for soils with a low pH, between 4.5 and 6.0, and these species can also survive healthily down to pH levels around 3.5 although growth rates would be likely to be slowed. The current soil pH ranges between 4.75 and 5.91 which indicates that even with the potential for soil acidification, the pH is likely to remain within a healthy range for these types of plants.

6.4.20 Due to the small increase in deposition predicted, the short duration of works and the acidic nature of the soil at Cestyll Garden, it is therefore considered highly unlikely that such small changes in nitrogen or acid deposition would affect the vegetation within the managed garden of Cestyll Garden.

6.4.21 With regard to dust emissions from the SPC Works and the application of mitigation measures, this was addressed in paragraph 4.1.15 of appendix 9-02 of the Environmental Statement which stated:

"…Cestyll Garden (Registered Historic Park and Garden Grade II) is adjacent to the SPC Application Boundary and has been identified as having vegetation that may be sensitive to dust deposition. Although not assessed specifically in this dust assessment, as its designation relates to its cultural heritage value rather than its ecological value, the application of mitigation measures applied to reduce the risks of dust effects at the assessed ecological receptors within or adjacent to the SPC Application Site (i.e. the Tre'r Gof SSSI and Cae Gwyn SSSI) would also reduce the risk of dust effects at Cestyll Garden…"

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6.4.22 The mitigation measures to prevent and control the emissions of dust with regard to the protection of vegetation at human and ecological receptors (including the vegetation within Cestyll Garden) are set out in the SPC CoCP.

Water quality/flows

6.4.23 The assessment presented in chapter 17 (Cultural heritage) took into account the results of the assessment presented in chapter 13 (Surface water and ground water).

6.4.24 As identified in paragraph 13.7.5 and 13.7.6 of chapter 13 (Surface water and ground water), the effects of changes in water quality on surface water receptors, including Afon Cafnan which runs through Cestyll Garden (HLT 2), have been assessed to be of negligible magnitude and negligible or minor significance. Based on this, no effect on Cestyll Garden is predicted from changes from water quality.

6.4.25 As identified in paragraph 13.7.7 of chapter 13 (Surface water and ground water), the significance of effect of changes in water availability on surface water receptors, including Afon Cafnan which runs through Cestyll Garden (HLT 2) has been assessed to be of negligible significance. Based on this no effect on Cestyll Garden is predicted from changes in flows.

6.4.26 As stated in 13.7.7 of chapter 13 (Surface water and ground water) as no significant effects were identified following the implementation of embedded and good practice mitigation measures (identified in paragraphs 13.4.20 and 13.4.21 of Chapter 13), and no additional mitigation measures were required.

6.5 IACC Request

6.5.1 *It is unclear whether the current programme of archaeological excavation will be affected by the proposed SPC Works as set out in application 38C310F/EIA/ECON and to what extent future proposed areas of archaeological interest will also be affected. This has the potential to have a significant effect since some of the areas of archaeological interest currently under investigation are potentially nationally important. Both the large Early-Medieval cemetery to the North East of the Fishermen's Carpark and the recently discovered settlement site at Caredegog Isaf could be considered of national importance.*

6.6 HNP Response

6.6.1 Horizon will continue to work with Gwynedd Archaeological Planning Service to integrate the mitigation works proposed in respect of the SPC Works with the ongoing archaeological investigations.

6.7 IACC Request

6.7.1 *In our response to the pre-application consultation on the SPC proposals, we stated that we would welcome assurance as to how the protection of historic features relating to the registered park and garden and its essential setting would*

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be achieved. Such features may include those relating to the walled garden, valley garden, house site, historic entrance drive, boundary walls and entrance gateposts. We could not see specific detail relating to this issue in the environmental statement. Drawing number 60PO078_SPC_ES_GEN_03_02 General Arrangement of the Site Preparation and Clearance Proposals depicts the proposed temporary fence line inside the site boundary and not appearing to impact on the essential setting or its boundary features, but clarification on this would be welcome.

6.8 HNP Response

6.8.1 As noted in paragraph 17.4.16 of chapter 17 (Cultural heritage), and as shown, for example, on figures 3.2, 17-18 and 17-19 of the Environmental Statement, Cestyll Garden is located outside the SPC Application Site. There would therefore be no physical effect on this heritage asset. It is through this heritage asset being located outside the SPC Application Site and the temporary fence that this heritage asset would be protected. To reduce the potential for accidental damage, a toolbox talk would be provided to those erecting the fence to provide them with an understanding of the sensitivity of Cestyll Garden. It can be confirmed that the proposed fence-line will not interfere with the essential setting or boundary features.

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7 Landscape and Visual Amenity

7.1 IACC Request

7.1.1 *Information/clarification is needed on the following:*

7.1.2 *a) Fencing details – Planning Application drawings nos 030, 032 and 033 – do not show foundation details. For 3m, 2m and 0.9m high fences, the posts will need to be concreted in. Have the materials arising from the excavations for the post holes and the importation of concrete for the fencing post foundations been allowed for in the materials calculations and the traffic movements?*

7.2 HNP Response

7.2.1 Planning Application drawings WN0903-JAC-OS-DRG-00030/A and WN0903-JAC-OS-DRG-00032/A have been updated to include foundation detailing. The fencing detailed on planning drawing WN0903-JAC-OS-DRG-00033 does not require a concrete foundation. Concrete will be brought onto site in 20kg bags and mixed on site. Any material remaining from the excavations will be redistributed around the posts to create a more natural ground profile. The submitted Transport Statement takes account of general construction related deliveries.

7.3 IACC Request

7.3.1 *b) Figures 16-4 and 16-5 – still refers to "Wylfa Head Candidate Wildlife Site" but should be labelled "Arfordir Mynydd y Wylfa – Trwyn Penrhyn Wildlife Site".*

7.4 HNP Response

7.4.1 Figure 16-4 has been amended to read "Arfordir Mynydd y Wylfa – Trwyn Penrhyn Wildlife Site". Figure 16-5 does not refer to the 'Wylfa Head Candidate Wildlife Site'.

7.5 IACC Request

7.5.1 *c) Arboricultural Survey – referred to on Figures 16-4 and 16-5 (ES Volume 2) as providing further information on vegetation and field boundaries. Is this the Tree Survey in Appendix 16-09? The accompanying figures referred to in Appendix 16-09 (dwg nos: 60PO8028-LSC-D-00014/15/17/18/19/20/22/23 Rev3) appear to be missing. Is this information provided on the planning application drawings: WN0903-JAC-OS-DRG-0036/00038/00039/00040/00041/00042/00043/00044? If so, it would be helpful if the trees, etc to be removed were in a different colour to those being retained as the difference between the solid and hatched lines makes this difference difficult to distinguish.*

7.6 HNP Response

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7.6.1 It is confirmed that the ‘’arboricultural survey’’ referred to on figures 16-4 and 16-5 is contained in appendix 16-09, titled the ‘’Tree Survey’’.

7.6.2 The accompanying figures referred to in appendix 16-09 ‘’Tree Survey’’ (dwg nos: 60PO8028-LSC-D-00014/15/17/18/19/20/22/23) comprise the ‘’Arboricultural Survey’’ drawings as titled.

7.6.3 Planning application drawings WN0903-JAC-OS-DRG-000036 Rev3, 00038 Rev 2, 00039 Rev2, 00040 Rev1, 00041 Rev1, 00042 Rev1, 00043 Rev2, 00044 Rev2, comprise the tree removal/retentions plans. The drawings have been amended to make the distinction between trees and hedgerows to be retained and those to be removed clearer.

7.7 IACC Request

7.7.1 *d) Figure 16-6 – still refers to Cestyll Gardens as a Registered Park and Garden but should be labelled as a “Registered Park and Garden of Special Historic Interest”.*

7.8 HNP Response

7.8.1 Figure 16-6 has been amended to read “Registered Park and Garden of Special Historic Interest”.

7.9 IACC Request

7.9.1 *e) Photography and visualisations for the representative and illustrative viewpoints in Appendices 16-03 to 16-05 have been presented at A3 and, as a consequence of the wide field of view illustrated, are reproduced at a very small scale which makes it difficult to see the detail, eg the fences added to the visualisations. On the basis of the 6” x 4” format specified on these figures, the viewing distance when printed at A3 is only 250mm. As recommended in guidance (LI Advice Note 01/11), photographs and visualisations should be presented at a consistent and realistic viewing distance which should be stated on each image (together with the size at which they should be printed). For hand held images, this viewing distance should be between 300mm and 500mm. For these figures, this could be achieved by printing these figures at A1 (rather than A3), which would provide a 500mm viewing distance.*

7.10 HNP Response

7.10.1 Appendix 16-05 provides the Illustrative visualisations showing how the SPC Application Site is likely to look on completion of the SPC Works. At a meeting with IACC on 26 February 2018, it was agreed that although these images are not intended as verified photomontage views, the figures comprising Appendix 16-05 would be provided at A1 size and can be found in Appendix 16-11.

7.11 IACC Request

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7.11.1 *f) Detailed survey of the existing landscape components of the site, along the lines of the Tree Survey in Appendix 16-09 but to also include all field and roadside boundaries, including stone walls, cloddiau, etc. and all footpath routes, surfacing and means of access, including gates, styles, etc. (see suggested Condition 1 below), with the losses of these and all trees, groups of trees, woodland, hedgerows, etc. quantified and assessed in the LVIA (see comments above and point 7 below).*

7.11.2 *g) Assessment of the effects on landscape components/elements taking into account the baseline condition, the natural heritage, landscape character and visual amenity value of these elements, the amount that will be lost and the ability of these features to re-generate or be restored if the DCO scheme does not go ahead.*

7.12 HNP Response

7.12.1 This information has been provided on Drawing 60PO8028_LSC_D_00025. The requested information on quantities has also made available noting that the Ecology chapter of the ES provides details of habitat losses, including lengths of hedgerow and areas of woodland. This information can be found at appendix 14-29 at volume 3 of this Addendum. However it is not necessary to refer to these quantities in the Landscape and visual chapter of the ES because landscape and visual impact assessment (LVIA) is a predominantly qualitative process.

7.12.2 The assessment of the effects on landscape components/elements has been incorporated into the assessment of the effects on landscape character, as set out in the Landscape and visual chapter of the ES and supporting Landscape effects schedules in appendix 16-07 of the SPC Environmental Statement.

7.12.3 The ability of soft landscape features to regenerate and for hard landscape features, such as dry-stone walls, to be reinstated is discussed in the Landscape and visual chapter of the ES, in section 16.10 Restoration.

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8 IACC – Housing/Accommodation

8.1 IACC Request

8.1.1 *No assessment/ information has been presented with regards to the impact on housing, it is stated that 'approximately 80 workers will be employed at peak, most of whom are expected to already reside within the DCCZ'. If this is not achieved workers would be expected to travel from outside the DCCZ and would require accommodation during the construction stage within the immediate area. No mitigation measures are proposed to deal with this risk.*

8.1.2 *The application should therefore make reference to Housing within its Environmental Statement and include measures for securing mitigation should local residents become displaced due to workers moving into the Private Rented Sector as a result of SPC Works.*

8.1.3 *Details on the justification and site selection for the Site Campus including consideration of alternatives.*

8.2 HNP Response

8.2.1 When considering the workforce used by Horizon's preferred contractor on the Early Works it is evident that 71% of workers are from the 'LL' postcode with a total of 86% of workers being from the North Wales area. It is anticipated that the workforce to undertake the SPC Works will have a similar make up in terms of workers from the local area.

8.2.2 Should Horizon's preferred contractor not be appointed it is anticipated that the Empty Homes Contribution could be utilised to provide assistance in line with the IACC's Empty Homes strategy in order to provide accommodation for workers who may not be able to commute from the home address to the SPC site.

8.2.3 It should be noted that the Site Campus does not form part of the SPC Application and as such discussion of its justification and site selection would be inappropriate in this instance

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9 Noise and Dust

9.1 IACC Request

9.1.1 *Specific noise and dust assessment for Felin Gafnan and Tyddyn Sidney residential properties rather than generic assessment.*

9.2 HNP Response

9.2.1 The assessment of dust emissions was undertaken using the methodology and approach agreed with the IACC during pre-application consultation and set out in a methodology report (previously supplied to the IACC) and developed through consultation with the IACC (and contained within appendix 09-05 of the ES Addendum document)

9.2.2 The assessment includes consideration of Felin Gafnan and Tyddyn Sidney residential properties and their distances to the SPC Application Boundary (at approximately 210m and 100m, respectively) in the determination of the risk of dust impacts and required mitigation measures. The risk levels and the subsequent determination of the level of mitigation to be applied for all SPC Works activities were primarily derived from residential properties which are closer to the SPC Application Site than Felin Gafnan and Tyddyn Sidney (see appendix 09-02 of the Environmental Statement). No significant noise effects are predicted at Felin Gafnan or Tyddyn Sidney as a result of the SPC Proposals. In addition, noise and vibration monitoring and control measures are set out in the noise and vibration management strategy of the CoCP, and are in-line with good practice.

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10 Policy and Strategy Officer (Welsh Language)

10.1 IACC Request

10.1.1 *The Welsh Language has consistently been considered as a golden thread through all project documentation. A statement is required outlining that Horizon and associated contractors will adhere to the IACC's Welsh Language Policy in all aspects of the project and in relation to communication with the public. A request is made that HNP liaise with IACC in preparing the final draft of Horizon's Welsh Language Policy.*

10.2 HNP Response

10.2.1 Both Horizon and its preferred contractor have adopted Welsh Language policies that adhere to the IACC's Welsh Language Policy.

10.2.2 Horizon remains committed to ensuring that it and its appointed contractors to the requirements of their respective Welsh language policies throughout all aspects of the SPC Works, in conjunction with the IACC. It is considered that this will maintain and enhance the golden thread of Welsh language though all activities.

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11 Hydrology

11.1 IACC Request

11.1.1 *There is insufficient detail provided to link the assessment undertaken to the result presented. More evidence is required, in particular with regard to impacts on hydrological functioning of SSSIs.*

11.2 HNP Response

11.2.1 The IACC concerns refer to effects on the SSSIs although most comments only focus on one SSSI, that at Tre'r Gof. However, the use of plural vocabulary, and one reference in the comments to Cae Gwyn (see below) indicates that there are concerns regarding potential effects of SPC Works on Cae Gwyn SSSI and so further information is provided below.

11.2.2 The Cae Gwyn SSSI is located outside of the Wylfa Newydd Development Area and is at the headwaters of the Nant Caerdegog Isaf. There are therefore no streams that flow into Cae Gwyn. Furthermore, there are no compounds proposed adjacent to the SSSI and the only activities would be removal of trees and hedges within the Wylfa Newydd Development Area. These represent a very small percentage of the land area as can clearly be seen on aerial photographs of the area. The majority of the vegetation is grassland that would not be changed. There is therefore no potential for any significant effects on the hydrology of Cae Gwyn SSSI, and there would be no change to the rate or timing of recharge to Cae Gwyn SSSI.

11.2.3 The hydrological functioning of Tre'r Gof and Cae Gwyn SSSIs has been assessed following monitoring and investigation at and around the features. The details of this have been compiled and draft reports provided to NRW and the IACC. Comments on the draft reports have been addressed and revised reports have been submitted within Appendices 13-05 and 13-06 of the Environmental Statement Addendum document. The draft reports were not submitted with the Site Preparation and Clearance Environmental Statement as the nature of the proposed works did not require a detailed assessment of the hydrology of the SSSIs due to the absence of any significant effects. However, the reports are available and provide details regarding the hydrological functioning of the SSSIs. The conclusions of the assessments support the evaluation of no significant effects from the SPC activities.

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12 Drainage

12.1 IACC Request

12.1.1 *The supporting documentation and reports state that the foul sewage generated by the proposed Welfare Facilities is to be removed off site for disposal and that there will be no discharges to controlled waters. While this suggests that a cesspool is to be provided to serve this part of the proposed development, the application form states that a septic tank is to be installed. The applicant should therefore clarify this apparent discrepancy and amend the submitted details accordingly.*

12.1.2 *Although the Environmental Statement and Flood Consequences Assessment recognise there are potential impacts as a consequence of the site clearance, temporary adjustments to site levels and the removal of informal flood management structures such as boundary walls and cloddiau; there is no supporting evidence to support the conclusion that the potential increase in flood risk is low. The applicant should provide greater detail of the assessment which has been undertaken and demonstrate that any possible amendments to the site topography/flow paths will not result in floodwater being directed to different catchments.*

12.1.3 *The applicant should provide design details for the surface water drainage system intended to serve the proposed Remediation Processing Compound.*

12.1.4 *A Management and Maintenance Plan detailing the intended regime for monitoring the operation of ordinary watercourses within the site should be included with the submission. The plan should provide a method statement to demonstrate how the watercourses are to be managed, so as to avoid siltation or obstructions which could result in increased flood risk elsewhere.*

12.1.5 *The intended diversion of the existing watercourse will apparently involve an extension to an existing land drainage system. It is suggested that the land drain is to be extended by installing a pipe within the bed of the abandoned section of watercourse; this proposal does not comply with the Authority's 'no culverting' policy and an open channel should therefore be provided. The applicant should therefore amend the submitted details accordingly to demonstrate compliance with the guidance.*

12.2 HNP Response

12.2.1 Cesspools and holding tanks, on mobile welfare units, will be utilised to manage the foul sewerage associated with the proposed welfare facilities. It is anticipated that final layout for both the Main Site Compound and the Remediation Compound will be secured through an appropriate planning condition.

12.2.2 The assessment of fluvial and pluvial flood risk presented in the Flood Consequence Assessment (FCA) is based on publicly available information from NRW in the form of fluvial and surface water flood maps and detailed hydraulic

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modelling undertaken by Horizon of the baseline and proposed changes as a result of the development.

12.2.3 High-resolution topographical details such as the presence of boundary walls and cloddiau are not explicitly modelled. This is true of both the NRW flood mapping, the flood mapping produced by Horizon and most if not, all hydraulic models built for flood mapping purposes, typically because at the scale of the modelling undertaken there is insufficient data on every feature to provide certainty on the robustness of the feature or its permeability to flow and influence therefore on flood risk. It is likely for example that, by their very nature, cloddiau will be permeable to overland flow with very little areas of ponding located behind as a result. The effect of this is that the modelled results, to a degree, already allow for the removal of these features.

12.2.4 The hydraulic modelling undertaken by Horizon is based on detailed 1m resolution LiDAR data supported by spot surveys and checks. This resolution of digital terrain model (DTM) is sufficiently detailed to ensure that topographical changes as a result of the proposed development are reflected in changes in flood extents, flood depths, and where output points have been located in the hydraulic model, in flood flows and velocities. For clarity, all changes to site topography are included within the 'with-scheme' hydraulic model, including the proposed drainage system. As such, the results provided in appendices to the FCA are representative of the effect on flood risk of all possible changes to topography/flow paths.

12.2.5 With respect to these output points, the hydraulic modelling undertaken for Site Preparation and Clearance include a large number of both output points and output lines, located within and across watercourses. Outputs lines are used to present data for a wider area than output points, which provide data for a single point only.

12.2.6 The data on flood depths, flows and velocities available at each of these output points and lines, and particularly comparison of baseline and 'with-scheme' results provides detail on any changes in these parameters and, because data are available at 15-minute intervals, changes in the timing of the hydrological response as a result of the proposed development. Away from these output points, flood depths and extent is mapped for a range of return period events for both the baseline and with-scheme scenarios for a range of return periods, and again comparison of the two provides an indication of the change in flood risk as a result of the development.

12.2.7 In combination, the volume of data available to identify changes in flood risk within, and the catchments containing, the SPC development, including at all potential receptors, is substantial. It has been provided with the documents submitted to the IACC as evidence of the change in risk as a result of the development. The volume of data is such that reference to only a relatively small number of outputs points is necessary to evidence the changes caused by the development within the FCA and these points are presented as evidence of those changes.

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12.2.8 Appendices to the FCA present all model outputs as well as the assessment methodology, which describes the criteria used to define the risk of flooding, which is a combination of the hazard (depth, velocity, duration etc.), the vulnerability of the land use and the probability of occurrence (return period).

12.2.9 Wherever a risk is described in the document, reference is made to each of these elements and how they are classified, so that it is clear how the conclusion of a low risk has been reached. Summary tables are presented in Section 6 of the FCA that highlight each of these classifications and the corresponding risk category for each area of the development, including off-site receptors.

12.2.10 The layout of the SPC Application Site and the proposed flood risk management measures are presented for those areas within the site that are noted as having a risk of flooding, even where it is classified as low. Management measures include the proposed drainage system to manage runoff from within the site, and adoption of a flood risk management plan, including receipt of flood warnings and operational measures to avoid areas at risk. It is considered that the information presented within the Environmental Statement, via mapped outputs and tabulated datasets from model output points, is sufficiently detailed to develop these mitigation measures such that appropriate plans will be in place to ensure no significant risk to people, plant, property or the environment.

12.2.11 With regard to off-site receptors, the conclusions of the assessment are that the overall impact of the Site Preparation and Clearance is low, as the IACC notes. This is based on simulations indicating that under the majority of conditions there will be no change in flood levels or a slight reduction in flood levels off-site during the development period. The exception to this is the 0.1% AEP event in which there may be an increased flood level of 0.01m. Given the short duration of the construction works the likelihood that this would occur is considered very low. The data supporting this conclusion are presented in Section 6 of the FCA, covering both fluvial and pluvial sources, and is supported by model outputs presented in appendices to the FCA.

12.2.12 It has been noted that NRW has requested information on the effect of the watercourse realignment in isolation from the rest of the proposed landform changes introduced by the SPC Proposals. The rationale for this request is that the watercourse realignment would have been an early activity that was expected to occur before the granting of consent to the rest of the main site developments. Subsequent amendments to the proposed development have resulted in the removal of the watercourse realignment, hence, there is now no longer a requirement to provide the information requested by NRW. It will be noted that this now means that the FCA and its supporting evidence include a feature that is no longer included. The information presented in the FCA is considered to represent a worst-case scenario with the inclusion of this feature, which it will be noted from the FCA resulted in a mixture of small localised increases and decreases in flood depth within the boundaries of the Site Preparation and Clearance site. Removal of this feature is expected to result in no local changes in flood levels, which under the FCA assessment methodology would result in a negligible impact on flood risk.

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12.2.13 In relation to a Management and Maintenance Plan detailing the intended regime for monitoring the operation of ordinary watercourses within the site is anticipated to be secured through a planning condition.

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13 Highways and Transport

13.1 IACC Request

13.1.1 *Further detail is required as to the proposed hauls roads to/from Satellite Compounds 9 and 10 from the A5025. Horizon to demonstrate sufficient visibility at the A5025/haul road junction to confirm suitability to accommodate additional HGV/traffic movements.*

13.2 HNP Response

13.2.1 The haul roads serving Satellite Compounds 9 and 10 utilise existing access tracks. Given that Horizon will ensure that marshals will be in place for any vehicle crossings at the A5025 junction, and that the existing visibility splays will be maintained as a minimum, it is considered that sufficient visibility will be achieved.

13.3 IACC Request

13.3.1 *Confirmation of the exact numbers of parking spaces that will be provided for the estimated 65 vehicles arriving and departing per weekday.*

13.3.2 *Confirmation that the improvements to the Nanner Road/A5025 junction will be carried out prior to any closure of Cemlyn Road.*

13.3.3 *Confirmation that the visibility splays have been achieved at the improved accesses on Cemlyn Road, as well as the proposed vehicular crossing point on the Existing Power Station access road.*

13.3.4 *Further detail as to the proposed temporary measures to deter vehicles from turning off the existing power station access road. This temporary measure may pose a hazard to existing road users.*

13.4 HNP Response

13.4.1 The Transport Statement predicts a worse-case position of 55 cars arriving and departing the SPC Application Site on a daily basis. In accordance with the submitted planning drawings 48 parking spaces, plus two disabled parking spaces, will be provided. As stated in the submitted CoCP, Horizon will introduce reasonable measures to promote an incentivise vehicle sharing, cycling and walking to work. In combination these measures and the proposed parking spaces are considered appropriate to accommodate the anticipated number of cars attending the site.

13.4.2 Horizon can confirm that the improvements to the Nanner Road/A5025 improvements have been completed. A Completion Certificate was issued by the IACC on 28th March 2017.

13.4.3 The haul roads accessed from Cemlyn Road and the Existing Power Station access road utilise existing access tracks. Given that Horizon will ensure that marshals will be in place for any vehicle crossings at these junctions, and that

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the existing visibility splays will be maintained as a minimum, it is considered that sufficient visibility will be achieved.

13.4.4 The temporary traffic measures will consist of waterfilled traffic barriers to deter vehicles turning off the existing power station access road. These barriers will be a type and nature that is in common use with their location such that highway safety will not be compromised.

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14 Police Issues

14.1 IACC Request

14.1.1 *Damage only and injury collisions could have an impact on the flow of traffic to and from the project site, as well as upon NWP police resources. Inclusion of damage only data is therefore required.*

14.2 HNP Response

14.2.1 The Transport Statement has been produced in accordance with the Welsh Transport Planning and Appraisal Guidance 2008 which specifies the use of personal injury accident data only.

14.2.2 The reporting of damage only accidents is not mandatory; as a consequence, reporting is unreliable and conclusions using the data could not be considered wholly robust.

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15 Magnox and NDA

15.1 IACC Request

15.1.1 *Assurance requested that the extension of the main site compound will result in reduced delays to vehicular traffic entering the compound and a consequential and significant reduction in traffic build up on the existing facility approach road and hence a reduction in the hazard to pedestrian and disruption to traffic wishing to continue to the existing facility. Of particular concern is the disruption to the movement of the flask transporter.*

15.1.2 *Assurance that arrangements for granting access to Magnox plant will be considered and agreed upfront with any Principal Contractor for the construction site.*

15.1.3 *Magnox require full visibility of the appointed contractor's Method Statements and Risk Assessments for all works near to Magnox services to ensure that adequate mitigation measures are to be deployed.*

15.2 HNP Response

15.2.1 HNP has continued to engage with Magnox and the NDA on all relevant matters. It is concluded that the proposed arrangements to be implemented on site between Magnox, the NDA, HNP and the contractors will be effectively implemented and managed to ensure that Magnox operations continue to be run effectively. It should be noted that these arrangements are not a material planning consideration and as such remain a private matter between the interested parties.

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16 Ecological and Environmental

16.1 IACC Request

16.1.1 *Further information is required in order to be able to evaluate impacts on ecology. This request is relevant to JLDP Strategic Policy PS19 and Policy AMG 5; also TAN 5 (6.2, 6.3, 6.4, 6.5 etc.), various protected species legislation, and the Environment Wales Act 2016 duty for the Council to seek to conserve and enhance biodiversity whilst carrying out its functions.*

16.1.2 *a) Tables and maps are required to illustrate how habitats and species are projected to be affected over the timeframe of the proposal. These should cover all relevant phases of the proposed works at appropriate time intervals, for the whole site, including ecological mitigation areas. These should be presented such as to allow users to follow, for example, how the total areas of scrub will lessen on the clearance areas in relation to their creation at the mitigation areas (in both tables and maps, with ha figures). For the tables and maps, it should be clear what areas of habitat will be available for relevant species groups at key stages of the proposals. Tables should cover timings of translocation in relation to areas of habitat which will be available, and also shown on maps (for example, area x in ha to be cleared of reptiles in year 1 and translocated to area y, in ha). We are seeking to understand what degree of continuity there will be in terms of available habitat areas on the site, in order to be better able to assess the projected impacts. This request is mainly relevant to Terrestrial Ecology, but should also be considered where relevant for impacts on Marine Ecology. (We note that maps of projected noise levels over the site have been provided, and our request includes maps which will show how habitats over the sites will change also.)*

16.2 HNP Response

16.2.1 a)

16.2.2 Horizon has collated information on the areas of different habitat within the SPC boundary, and detailed the loss of each habitat within each of the proposed work areas. Section 7 habitats have also been identified. All this information is included in appendix 14-29 of this ES Addendum.

16.2.3 It is anticipated that a works schedule will be secured by an appropriate planning condition, this information should enable IACC to assess the type, extent and location of habitats being cleared as the work progresses.

16.2.4 This assessment is based on Tthe habitat compensation areas having already been created and allowed to mature and provide suitable habitats for their intended receptors. This is summarised in the table below.

Site	Area	Habitat creation	Duration between time habitat were	Duration between time habitat were

		works completed	created and start of SPC Works (based on start date of clearance works in September 2018)	created and the end of SPC Works (based on end date of clearance works in October 2019)
Reptile receptor site	**5ha**	**January 2018**	**Eight months**	**21 months**
Notable wildlife enhancement site	**15ha**	**January 2018**	**Eight months**	**21 months**

16.2.5 The table shows that Horizon has already committed to the creation of habitats for specific receptors as mitigation. By creating these habitats ahead of permission for the TCPA, Horizon has maximised the potential for these habitats to be successful and to achieve the reductions in significance of effects presented in the environmental statement.

16.2.6 Horizon has created all the proposed compensatory habitats in one go (with the exception of great crested newts – see below). It is therefore not possible for users to follow how much of each habitat type created within the compensation sites will be available, compared to what is lost from within the SPC Application Site. The only measure that could be provided is the age and therefore maturity of each compensation habitat type against losses from within the SPC Application Site. However, for the reasons described below this is not considered to provide particularly valuable information. This is because all it will demonstrate is that the compensation site habitat maturation and quality will increase as the percentage habitat loss increases from within the SPC Application site.

16.2.7 For reptiles, this also means that there is no value in presenting timings in relation to the translocation of animals as all habitats within the reptile receptor area would be available. Similarly, and also described in greater detail below, this is because it is not possible to quantify in terms beyond general trends, that habitat clearance; numbers of animals translocated; and receptor site habitat maturity, will all increase gradually as the SPC Works progress. This therefore would not aid understanding of the impact of phasing of habitat loss.

16.2.8 In the first stages of clearance works, the provision of habitats that can be ready to support translocated or displaced species is vital to the success of the mitigation. It is considered that this will have been achieved by allowing sufficient time for maturation ahead of clearance works. Furthermore, because numbers of translocated or displaced species would rise gradually from zero or very low numbers, in the event that habitats are not yet fully mature when works start, the quantity of sub-optimal habitats provided would still be able to support the number of animals translocated or displaced.

16.2.9 It is acknowledged that there would be periods of higher and lower clearance rates of vegetation during the SPC Works and that this would have an impact on

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rates of species translocation and displacement. However, it considered that there are too many potentially competing variables to make it possible to determine in any meaningful way what effect this may have on the success of the compensation habitats, including:

- localised habitat quality in the SPC Application Site;
- populations sizes of species likely to be translocated or displaced in the SPC Application Site;
- the distribution of species likely to be translocated or displaced from within the SPC Application Site;
- the maturation rate of the compensation habitats;
- colonisation of the compensatory habitats by species from outside the SPC Application Site before clearance works; and
- stochastic events e.g. flooding.

16.2.10 In addition, there is also the potential for species to be displaced, but to remain in different areas yet to be cleared within the SPC Application Site as the clearance progresses. Due to the directional nature of working (east to west), hypothetically this may have the effect of displacement being concentrated towards the end of the SPC Works, when habitats within the compensation sites are most mature, making it more likely that sites would be colonised successfully.

16.2.11 In summary, it is considered that the compensatory habitats will achieve their goals outlined in the SPC Environmental Statement, and that providing additional information regarding the rate of habitat clearance will not enhance the understanding of the assessment of effects. This is due to: the maturation time allowed between creating compensatory habitats and start of clearance works; the size of the compensatory habitats; and the two-year continuum of habitat maturation running in parallel with the gradual (but unquantifiable) increase in translocated or displaced animals over a 13-month program (from September 2018 to October 2019).

16.2.12 For great crested newt, the requirements of the receptor site in terms of carrying capacity is defined by the number of animals likely to be translocated. Based on the findings of the surveys, and as presented in the European Protected Species Licence documents (appendix 14-19 and appendix 14-20), the population is low and affected habitats in which the species may be found are all over 200m from breeding ponds. Taken together, and based on the habitats within the great created newt receptors site, it is also considered that the phasing of habitat clearance would not influence the success of their colonisation of the receptor site.

16.2.13 There is not considered to be any potential for effects on marine based receptors to be influenced by the creation and development of terrestrial compensatory habitats.

16.3 IACC Request

16.3.1 *b) Acknowledgement of existence, and due consideration of local Wildlife Sites G13 Arfordir Mynydd y Wylfa – Trwyn Penrhyn and G12 Trwyn Pencarreg*

16.4 HNP Response

16.4.1 b) With the opportunity presented by this consultation, Horizon has produced an update based on the adopted JLDP with the inclusion of an assessment of potential effects on the G13 Arfordir Mynydd y Wylfa – Trwyn Penrhyn Wildlife Site. This is contained within the SPC ES Addendum (Chapter 14), and summarised below. It is not considered necessary to alter the assessment of effects on the G12 Trwyn Pencarreg Wildlife Site, as its adoption from a Candidate Wildlife Site does not alter its important features.

16.4.2 The assessment of effects on the G13 Arfordir Mynydd y Wylfa – Trwyn Penrhyn Site presented in the SPC ES Addendum is based on the site supporting four notable features: coastal grassland and heath; chough; a gull colony; and harbour porpoise. Based on the assessment in chapter 14 finding negligible effects on chough (chapter 14); sea birds (chapter 15) and harbour porpoise (chapter 15) it is not considered that additional assessment is required to determine effects on these receptors as notable features of the wildlife site. However, the potential for changes in air quality to cause significant impacts on the habitats within the wildlife site was identified, and is presented below.

16.4.3 The G13 Arfordir Mynydd y Wylfa – Trwyn Penrhyn Wildlife Site is adjacent to the SPC Application Site boundary and is, therefore, within the 50m study area for the assessment of dust emissions generated by the SPC Works. It comprises a mixture of coastal grassland with some areas of heather (Calluna vulgaris). The Wildlife Site has been classed as a Low sensitivity receptor in accordance with the Institute of Air Quality Management (IAQM) guidance used for the assessment of dust emissions.

16.4.4 The site clearance activities, including vegetation clearance and demolition of walls and fences, would be undertaken in close proximity to the southern boundary of the Wildlife Site. The sensitivity of the area with regard to G13 Arfordir Mynydd y Wylfa – Trwyn Penrhyn Wildlife Site is classed as Low for the demolition, earthworks and constriction activities and not applicable for trackout due to the large distance to local road network.

16.4.5 The dust risks for the G13 Arfordir Mynydd y Wylfa – Trwyn Penrhyn Wildlife Site is classed as a Low risk for the demolition and earthworks and negligible risk for construction and trackout activities. However, as set out in table 5-5 of appendix 09-02 of the Environmental Statement, the overall risk to ecological sites was based on the highest risk identified for any of the ecological receptors (i.e. the more sensitive sites of Tre'r Gof SSSI and Cae Gwyn SSSI). This resulted in Medium risk for demolition and earthworks activities and Low for construction activities, with negligible for trackout. These higher risk levels were taken forward to inform the level of good practice mitigation required to be adopted during the SPC Works to protect ecological receptors and reduce the potential for dust

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emissions to potentially lead to significant dust effects. The mitigation measures are set out in the SPC CoCP.

16.4.6 The potential dust effects at all ecological receptors, including the G13 Arfordir Mynydd y Wylfa – Trwyn Penrhyn Wildlife Site, are not significant with these good practice mitigation measures in place.

Emissions of pollutants

16.4.7 This section presents an assessment of emissions of pollutants from construction plant and machinery which supplements the assessment undertaken and reported in chapter 9 of the Environmental Statement.

16.4.8 The predicted maximum NOx and SO2 concentrations at the G13 Arfordir Mynydd y Wylfa – Trwyn Penrhyn Wildlife Site are shown in the table below.

Predicted maximum NOx and SO2 concentrations at G13 Arfordir Mynydd y Wylfa – Trwyn Penrhyn Wildlife Site.

Pollutant	Averaging period	Critical level (CLE) (µg/m^3)	PC (µg/m^3)	PEC (µg/m^3)	PC/CLE (%)	PEC/CLE (%)	Further consideration required?
NOx	Annual mean	30	0.29	9.16	1%	31%	No
	Maximum 24-hour mean	200	2.62	20.35	1%	10%	No
SO_2	Annual mean	20	0.001	3.34	<0.01%	17%	No

16.4.9 The predicted annual mean NOx and SO2 concentrations at G13 Arfordir Mynydd y Wylfa – Trwyn Penrhyn Wildlife Site are well below the relevant critical levels. The predicted maximum 24-hour mean NOx concentrations were also considerably lower than the relevant critical level. The predicted concentrations are also below the criteria for identifying where further consideration would be required by an ecologist (see the criteria adopted for Wildlife Sites in paragraph 9.4.66 of chapter 9 of the Environmental Statement).

16.4.10 The predicted nitrogen and acid deposition rates at G13 Arfordir Mynydd y Wylfa – Trwyn Penrhyn Wildlife Site are set out in the tables below.

Predicted maximum nutrient nitrogen deposition at G13 Arfordir Mynydd y Wylfa – Trwyn Penrhyn Wildlife Site

Vegetation type	Nutrient nitrogen deposition (kgN/ha/year) [1]						Further consideration required?
	Critical load (CLO)	Existing deposition	PC	PEC	PC/CLO (%)	PEC/CLO (%)	
Short	10	13.0	0.030	13.05	0.3%	130%	No

Note 1: kgN/ha/year - Kilograms of nitrogen per hectare per year

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Predicted maximum acid deposition at G13 Arfordir Mynydd y Wylfa – Trwyn Penrhyn Wildlife Site

Vegetation type	Acid deposition (keq/ha/year) [1]						Further consideration required?
	CLO (CLMaxN)	Existing acid deposition (N + S)	PC	PEC	PC/ CLO (%)	PEC / CLO (%)	
Short	**1.02**	**1.1**	**0.002**	**1.10**	**0.2%**	**108%**	**No**

Note 1: keq/ha/year - Kilo equivalents per hectare per year

Note 2: CLMaxN – maximum acid deposition critical load for nitrogen

16.4.11 The results show that at G13 Arfordir Mynydd y Wylfa – Trwyn Penrhyn Wildlife Site the PC for nitrogen and acid deposition rates are less than 100% of the relevant critical loads. Therefore, the deposition rates are below the relevant criteria (see paragraph 9.4.66 of chapter 9 of the Environmental Statement) for identifying a potentially significant effect at these sites which requires further consideration by an ecologist.

16.4.12 On this basis, the nitrogen and acid deposition due to emissions from the plant and machinery is categorised as a not significant effect at G13 Arfordir Mynydd y Wylfa – Trwyn Penrhyn Wildlife Site.

16.5 IACC Request

16.5.1 *c) This request is relevant to JLDP Strategic Policy PS19 and Policy AMG 6; also TAN 5 (5.5), and the Environment Wales Act 2016 duty for the Council to seek to conserve and enhance biodiversity whilst carrying out its functions. (Background: Candidate Wildlife Sites were included in the JLDP (constraints map). The designation is not allocated through the JLDP process itself as such, but their inclusion is both informative and, upon adoption of the JLDP by full Council, those sites which have been surveyed deemed to be formalised, and thereafter no longer 'candidate' sites. Wildlife Sites are protected by Policy AMG 6. Whilst Horizon had objected to the inclusion of Wylfa Head, the site (G13), as well as G12 are thus now Wildlife Sites. (On the existence of some candidate sites after the JLDP process, a footnote on p176 of the JLDP explains that sites which have not been surveyed will remain candidate until surveyed. G12 and G13 have been surveyed, and are listed on p282 Appendix 7 of the final JLDP as 'Wildlife Sites'.) The application documents refer to local Wildlife Sites, mainly denying G13 but acknowledging G12 as 'candidate', although there is inconsistency in the approach:*

16.5.2 *d) ES, chapter 14, Table 14-5 states '…Wylfa Head is not a statutory or non-statutory site for nature conservation…'; Tables 14-13 and 14-18 do not include the site, neither has it been considered in relation to Section 14.11.3 (last sentence). The site does however appear on Figure 16-4 as 'Wylfa Head Candidate Wildlife Site'; Trwyn Pencarreg is acknowledged for example in Tables*

14-13 and 14-18, and Figure 14-3 (but as Trwyn Pencarreg Candidate Wildlife Site).

16.5.3 *e) Both sites (and any others that may be relevant) need to be acknowledged as Wildlife Sites (and not 'candidate'), and considered for impacts accordingly in the application. It appears for example that the proposed security fencing will come to the very edge of (or possibly within) G13. This situation should be assessed and clarified. It may be acceptable for a supplementary document to be produced in relation to Wildlife Sites, with updated versions of all relevant maps on which Wildlife Sites should appear.*

16.6 HNP Response

16.6.1 c), d) and e) Horizon has produced an update to the assessment of effects based on the changes in designation to the G13 Arfordir Mynydd y Wylfa and Trwyn Penrhyn Wildlife Sites following adoption of the finalised JLDP. This is contained within the SPC ES Addendum (Chapter 14). Within this addendum, an assessment of effects on the G13 Arfordir Mynydd y Wylfa is provided in full. However, it is not considered necessary to alter the assessment of effects on the G12 Trwyn Pencarreg Wildlife Site, as its adoption from a Candidate Wildlife Site does not alter its important features. These changes have also been reflected in amendments to all relevant ES Figures and planning drawings. Horizon has considered and confirmed there are no other sites of relevance, beyond what has been assessed.

16.7 IACC Request

16.7.1 *f) Ecological Surveys are required as follows:*

16.7.2 *(i) 14-01 Phase 1 Habitat Survey: Executive Summary (no page number) has recommendations for further study of meadows, heathland, saltmarsh and shingle beach, field boundaries. Question: Was there any specific follow-up for the issues raised?*

16.7.3 *(ii) 14-08 NPS Site Great Crested Newt Baseline Surveys 2014. Executive Summary: Surveys recommended for 2017 season. Question: Where are the results and report from these 2017 surveys to inform the case? Question: This Report does not include Conclusions or Recommendations sections – are such sections available?*

16.8 HNP Response

16.8.1 f) (i) The NVC surveys described in appendix 14-02 were completed in areas determined following the Phase 1 habitat surveys, including in all areas supporting the habitat types listed in the consultation response. The conclusions from these surveys informed the valuation of these habitats, assessment of effects and mitigation in the normal course of using the ES methodology.

16.8.2 f) (ii) The 2017 great crested newt survey results were not available at the time of publishing the SPC ES. They are now available and are provided in Appendix

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14-27 to the SPC Environmental Statement Addendum, where they are also fully described. In summary the results do not alter the assessment in the ES, or the draft European Protected Species Mitigation Licence (appendix 14-20 of the ES). The purpose of the NPS Site Great Crested Newt Baseline Surveys 2014 (Appendix 14-08) was to present the baseline conditions on which the assessment in the SPC Environmental Statement was made and therefore its scope was not to provide conclusions or recommendations.

16.8.3 The Workers Accommodation Campus does not form part of the SPC proposals. However, as with all SPC Works the application is seeking planning permission for preparatory works in advance of the DCO which will include the Workers Accommodation Campus. Should the DCO not be granted or the development not proceed the site of the proposed Workers Accommodation Campus would also be subject to a restoration strategy to be agreed with the IACC.

16.9 IACC Request

16.9.1 *Results of grassland fungi survey – autumn 2017 is required.*

16.9.2 *Set-up specifications for species receptor areas (Notable Wildlife Enhancement Area & Mynydd Ithel) are required.*

16.10 HNP Response

16.10.1 Further fungi survey work was undertaken 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 Environmental Statement Addendum document. The 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.

16.10.2 Prior to enhancement works taking place at the reptile receptor site the area was predominantly close-grazed horse pasture and was therefore considered only likely to support small numbers of reptiles (if any) in peripheral areas. Following the completion of works 5ha of high quality reptile habitat will establish (see ES Figure 14-01) and will continue to be managed for the remainder of the 15-year lease.

16.10.3 Prior to enhancement works taking place at the Notable Wildlife receptor site the area was predominantly improved grassland. The proposals illustrated on ES Figure 14-12 is designed to provide refuge and foraging opportunities for a wide range of species that will potentially be displaced from the SPC Application Site, including polecat and other mammalian predators. The Notable Wildlife Enhancement Area is designed principally to provide a strong corridor (in terms of cover and foraging opportunity) through which any displaced animals can move from the Wylfa Newydd Development Area and into adjacent habitats and the wider landscape. Following the completion of works 15ha of high quality habitat will establish and will continue to be managed for the remainder of the 15-year lease.

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17 Conclusion

17.1.1 The above information considers the Regulation 22 request prepared by the IACC.

17.1.2 In respect of EIA matters, all relevant consultation responses are addressed within the ES Addendum and associated Appendices. Similarly, all relevant consultation responses relating to the Habitats Regulations Assessment are considered in the RIHRA Addendum.

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Eich Cyf / Your Ref:

Dyddiad / Date: 09/02/2018

Mr. Kieran Somers
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Annwyl / Dear Kieran

REQUEST FOR ADDITIONAL INFORMATION AND MATERIAL
PLANNING APPLICATION REFERENCE 38C310F/EIA/ECON; SITE PREPARATION AND CLEARANCE WORKS AT WYLFA NEWYDD ("THE APPLICATION")

Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2016 (the "EIA Regulations");[1]
The Conservation of Habitats and Species Regulations 2017 (the "HRA Regulations"); Regulation 70

This letter, together with the attached annex, are a formal request for further environmental information made by the Planning Authority under Regulation 22 of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2016.

Following initial consideration of the Application and review of consultation responses received, the Planning Authority writes to advise that it does not consider that it has enough information to determine the Application at this time and that further information is required.

[1] Per 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.

Environmental Impact Assessment (EIA)

As has been previously advised, the Council, as Local Planning Authority, consider the Application to form a first phase of the overall Wylfa Newydd project. This is also the approach underpinning the justification made for the proposed works within the Application. The Planning Statement submitted as part of the application expressly states that "The SPC Proposals represent the initial development element of the Wylfa Newydd project"[2] and are "preparatory activities and works to facilitate the construction of the power Station"[3]. In addition, given that Horizon are also including the site preparation and clearance works within the DCO application[4], these works form a part of the overall DCO project and must be considered and assessed within that context.

The Council, therefore, do not consider that the information set out by Horizon to date is sufficient and further environmental information is required to allow it properly to consider the planning application. In this regard, information is required on the intra-project effects, in particular those created by the SPC and main construction, and the intra-project effects together with the cumulative effects with other projects. At this time the information is inadequate and, in the case of total cumulative effects including intra-project effects, these cannot be located at all[5].

In addition to this, further information is sought across a number of topics. Please see the attached annex for a complete list of all of the additional further environmental information required.

Habitats Regulation Assessment (HRA)

Consultees, including internal IACC consultees, have raised a number of points which are fundamental to whether a robust HRA decision can be taken now. Further information is accordingly sought on a number of points which are listed in the attached Annex.

In addition to the specific information requests, the Planning Authority requires further detail on the in-combination effects with the other Wylfa elements and other projects. Horizon have submitted that "given the extremely limited potential of the SPC Proposals to contribute to LSEs from effects acting alone, it is also considered that there is no potential for the effects to contribute to LSEs when acting in combination with any other plans or project"[6]. It is not considered appropriate to scope out all intra-project and cumulative assessment, particularly given the potential to contribute to the effects of the main consenting which will largely overlap spatially, extend the period of effects and potentially effect the same designated sites ' objectives as the Application works.

Until the information identified in the Annex is provided and is sufficient to address the points of doubt currently noted, or, where following provision of some

[2] Planning Statement paragraph 1.1.2

[3] Ibid paragraph 1.4.2

[4] As stated in the application documents, for example see ES Volume 1, paragraph 1.1.4

[5] This omission has already been raised with Horizon.

[6] Report to Inform Habitats Regulations Assessment and Screening, paragraph 5.1.20

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information further information is considered by the IACC to be necessary, the Council will have no option but to proceed to undertake an Appropriate Assessment as, at this time, likely significant effects cannot reasonably be ruled out.

The attached Annex sets out in detail the further information requested. Once this information has been received, the Council will be required to advertise it in accordance with the provisions of the 2016 Regulations. The Planning Authority will also write to all statutory consultees informing them of the receipt of the information. Where the information provided is not deemed by the Planning Authority to be adequate, the Planning Authority reserves the right to make further information requests if required.

We note at this time that given the advertisement requirements it will not be possible to meet the latest anticipated date for determination of the Application (08 March 2018) and a formal request for extension will follow this letter, once the further environmental information is received and the dates of the advertisement period are known.

Yours Sincerely

DYLAN J. WILLIAMS
Pennaeth Gwasanaeth – Rheoleiddio a Datblygu Economaidd
Head of Service - Regulation and Economic Development

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APPENDIX A: SITE PREP & CLEARANCE SUMMARY OF INFORMATION REQUIRED

INTRA-PROJECT INFORMATION
1. The purpose of the Site Preparation and Clearance (SPC) proposals is to prepare the Wylfa Newydd Development Area to facilitate the construction activities authorised by the Development Consent Order (DCO). It is therefore the first phase of the overall Wylfa project. Information is therefore required on the intra-project effects (in particular those created by the SPC and main construction) and the intra-project effects together with the cumulative effects of other projects. As part of this, the following specific information has been identified as required: a) Air Quality information on predicted emissions for other relevant developments (including DCO proposals) to be provided to demonstrate whether the emissions from the SPC works have the potential to have significant effects cumulatively or in-combination b) Flood Risk information on the modelled outputs which consider pre- and post-development scenarios (shown as changes (increases / decreases) in flood depth) and details of any required floodplain storage. c) In combination/cumulative impacts of SPC and DCO application effects on terns. d) Additional information/assessment of the impact on terns including proposed mitigation measures to demonstrate no or imperceptible effects due to disturbance on the tern species of the SPA. e) Set up specifications for species receptor sites. f) A cumulative impact assessment for chough. g) An assessment of functional linkage of breeding chough contribution to Holy Island Coast SPA breeding colony. h) Information/assessment of the impacts on foraging black-headed gulls i) Information/assessment on predator displacement.
TRADING STANDARDS
2. Confirmation that, while there is reference to the local petrol filling station, a proposed fuel store is also being provided.
ARCHEOLOGY AND HISTORIC ENVIRONMENT
3. Additional information is required on the mitigation measures to be used, and residual effects on Cestyll Garden Grade II Registered Historic Park and Garden (this asset was specifically noted by CADW as requiring assessment for this application). From a review of the scoping report and the CADW response, the scope of the required assessment for this asset was to cover potential effects arising from: • Visual change (setting affect); • Noise change (setting affect); • Vibration change (setting affect); • Dust and air pollutant emissions (effect on garden planting); and • Water quality/flows (effect on stream running through garden).

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Cestyll garden is dealt with as a 'Historic landscape type' within Chapter 17 and is identified as being of high value, reflecting its designated status.
ES Chapter 17 correctly identifies the CADW guidance on assessing effects on the setting of historic assets (CADW 2017 Setting of Historic Assets in Wales). However, the baseline description for Cestyll Garden (pages 17-36, 17-37, with a similar level of detail in page 33 of Appendix 17-01 (Volume 3F)) is brief and should provide more information with reference to the aspects identified in the guidance for Stage 2 of the assessment process.
There is no mitigation identified with respect to this asset. There is no discussion of effects on this asset, and the assessment is provided only in tabular form.

Further information is required in order to confirm the validity of this assessment. Taking each aspect of the potential effects in turn:

- Visual change;
    - What will be the extent and nature of visual intrusion
    - What will be the duration of this
- Noise change;
    - What will be the extent and nature of noise intrusion (e.g. how would this be experienced)
    - What will be the duration of this
- Vibration change;
    - Not assessed – can it be confirmed that vibration would not be experienced
- Dust and air pollutant emissions
    - What is the evidence that there will be no effect from this
    - Are mitigation measures (e.g. dust suppression) to be used
- Water quality/flows (effect on stream running through garden)
    - What is the evidence that there will be no effect from this
    - Are mitigation measures (e.g. drainage/run-off management) to be used.

The impacts on Cestyll Registered Historic Park Garden (see the statutory register under the provisions of the Historic Environment Wales Act 2016) have not been properly assessed in this application. Though we note that an Assessment of the Significance has been completed (GAT report G2096 is referenced in Appendix volume 3F), the findings of this assessment are not presented here and the impacts of Site Preparation and Clearance (SPC) works, such as dust, noise and vehicle movements, need to be considered against this assessment.

It is unclear whether the current programme of archaeological excavation will be affected by the proposed SPC works as set out in application 38C310F/EIA/ECON and to what extent future proposed areas of archaeological interest will also be affected. This has the potential to have a significant effect since some of the areas of archaeological interest currently under investigation are potentially nationally important. Both the large Early-Medieval cemetery to the North East of the Fishermen's Carpark and the recently discovered settlement site at Caredegog Isaf could be considered of national importance.

In our response to the pre-application consultation on the SPC proposals, we stated that we would welcome assurance as to how the protection of historic features relating to the registered park and garden and its essential setting would be achieved. Such features may include those relating to the walled garden, valley garden, house site, historic entrance drive, boundary walls and entrance gateposts. We could not see specific detail relating to this issue in the environmental statement. Drawing number

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60PO078_SPC_ES_GEN_03_02 General Arrangement of the Site Preparation and
Clearance Proposals depicts the proposed temporary fence line inside the site boundary and not appearing to impact on the essential setting or its boundary features, but clarification on this would be welcome.

LANDSCAPE AND VISUAL AMENITY

4. Information/clarification is needed on the following:

a) Fencing details – Planning Application drawings nos 030, 032 and 033 – do not show foundation details. For 3m, 2m and 0.9m high fences, the posts will need to be concreted in. Have the materials arising from the excavations for the post holes and the importation of concrete for the fencing post foundations been allowed for in the materials calculations and the traffic movements?
b) Figures 16-4 and 16-5 – still refers to "Wylfa Head Candidate Wildlife Site" but should be labelled "Arfordir Mynydd y Wylfa – Trwyn Penrhyn Wildlife Site".
c) Arboricultural Survey – referred to on Figures 16-4 and 16-5 (ES Volume 2) as providing further information on vegetation and field boundaries. Is this the Tree Survey in Appendix 16-09? The accompanying figures referred to in Appendix 16-09 (dwg nos: 60PO8028-LSC-D-00014/15/17/18/19/20/22/23 Rev3) appear to be missing. Is this information provided on the planning application drawings: WN0903-JAC-OS-DRG-000036/00038/00039/00040/00041/00042/00043/00044? If so, it would be helpful if the trees, etc to be removed were in a different colour to those being retained as the difference between the solid and hatched lines makes this difference difficult to distinguish.
d) Figure 16-6 – still refers to Cestyll Gardens as a Registered Park and Garden but should be labelled as a "*Registered Park and Garden of Special Historic Interest*".
e) Photography and visualisations for the representative and illustrative viewpoints in Appendices 16-03 to 16-05 have been presented at A3 and, as a consequence of the wide field of view illustrated, are reproduced at a very small scale which makes it difficult to see the detail, eg the fences added to the visualisations. On the basis of the 6" x 4" format specified on these figures, the viewing distance when printed at A3 is only 250mm. As recommended in guidance (LI Advice Note 01/11), photographs and visualisations should be presented at a consistent and realistic viewing distance which should be stated on each image (together with the size at which they should be printed). For hand held images, this viewing distance should be between 300mm and 500mm. For these figures, this could be achieved by printing these figures at A1 (rather than A3), which would provide a 500mm viewing distance.
f) Detailed survey of the existing landscape components of the site, along the lines of the Tree Survey in Appendix 16-09 but to also include all field and roadside boundaries, including stone walls, cloddiau, etc and all footpath routes, surfacing and means of access, including gates, styles, etc (see suggested Condition 1 below), with the losses of these and all trees, groups of trees, woodland, hedgerows, etc quantified and assessed in the LVIA (see comments above and point 7 below).
g) Assessment of the effects on landscape components/elements taking into account the baseline condition, the natural heritage, landscape character and visual amenity value of these elements, the amount that will be lost and the ability of these features to re-generate or be restored if the DCO scheme does not go ahead.

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IACC – HOUSING/ACCOMMODATION

1. No assessment/ information has been presented with regards to the impact on housing, it is stated that 'approximately 80 workers will be employed at peak, most of whom are expected to already reside within the DCCZ'. If this is not achieved workers would be expected to travel from outside the DCCZ and would require accommodation during the construction stage within the immediate area. No mitigation measures are proposed to deal with this risk.

   The application should therefore make reference to Housing within its Environmental Statement and include measures for securing mitigation should local residents become displaced due to workers moving into the Private Rented Sector as a result of SPC Works.

2. Details on the justification and site selection for the Site Campus including consideration of alternatives.

NOISE AND DUST

3. Specific noise and dust assessment for Felin Gafnan and Tyddyn Sidney residential properties rather than generic assessment.

POLICY & STRATEGY OFFICER (WELSH LANGUAGE)

4. The Welsh Language has consistently been considered as a golden thread through all project documentation. A statement is required outlining that Horizon and associated contractors will adhere to the IACC's Welsh Language Policy in all aspects of the project and in relation to communication with the public. A request is made that HNP liaise with IACC in preparing the final draft of Horizon's Welsh Language Policy.

HYDROLOGY

5. There is insufficient detail provided to link the assessment undertaken to the result presented. More evidence is required, in particular with regard to impacts on hydrological functioning of SSSIs.

DRAINAGE

6. The supporting documentation and reports state that the foul sewage generated by the proposed Welfare Facilities is to be removed off site for disposal and that there will be no discharges to controlled waters. While this suggests that a cesspool is to be provided to serve this part of the proposed development, the application form states that a septic tank is to be installed. The applicant should therefore clarify this apparent discrepancy and amend the submitted details accordingly.

7. Although the Environmental Statement and Flood Consequences Assessment recognise there are potential impacts as a consequence of the site clearance, temporary adjustments to site levels and the removal of informal flood management structures such as boundary walls and cloddiau; there is no supporting evidence to support the conclusion that the potential increase in flood risk is low. The applicant should provide greater

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detail of the assessment which has been undertaken and demonstrate that any possible amendments to the site topography/flow paths will not result in floodwater being directed to different catchments.

8. The applicant should provide design details for the surface water drainage system intended to serve the proposed Remediation Processing Compound.

9. A Management and Maintenance Plan detailing the intended regime for monitoring the operation of ordinary watercourses within the site should be included with the submission. The plan should provide a method statement to demonstrate how the watercourses are to be managed, so as to avoid siltation or obstructions which could result in increased flood risk elsewhere.

10. The intended diversion of the existing watercourse will apparently involve an extension to an existing land drainage system. It is suggested that the land drain is to be extended by installing a pipe within the bed of the abandoned section of watercourse; this proposal does not comply with the Authority's 'no culverting' policy and an open channel should therefore be provided. The applicant should therefore amend the submitted details accordingly to demonstrate compliance with the guidance.

11. Further detail is required as to the proposed hauls roads to/from Satellite Compounds 9 and 10 from the A5025. Horizon to demonstrate sufficient visibility at the A5025/haul road junction to confirm suitability to accommodate additional HGV/traffic movements.

HIGHWAYS AND TRANSPORT

12. Confirmation of the exact numbers of parking spaces that will be provided for the estimated 65 vehicles arriving and departing per weekday.

13. Confirmation that the improvements to the Nanner Road/A5025 junction will be carried out prior to any closure of Cemlyn Road.

14. Confirmation that the visibility splays have been achieved at the improved accesses on Cemlyn Road, as well as the proposed vehicular crossing point on the Existing Power Station access road.

15. Further detail as to the proposed temporary measures to deter vehicles from turning off the existing power station access road. This temporary measure may pose a hazard to existing road users.

POLICE ISSUES

16. Damage only and injury collisions could have an impact on the flow of traffic to and from the project site, as well as upon NWP police resources. Inclusion of damage only data is therefore required.

MAGNOX & NDA

17. Assurance requested that the extension of the main site compound will result in reduced delays to vehicular traffic entering the compound and a consequential and significant reduction in traffic build up on the existing facility approach road and hence a reduction in the hazard to pedestrian and

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disruption to traffic wishing to continue to the existing facility. Of particular concern is the disruption to the movement of the flask transporter.

18. Assurance that arrangements for granting access to Magnox plant will be considered and agreed upfront with any Principal Contractor for the construction site.

19. Magnox require full visibility of the appointed contractor's Method Statements and Risk Assessments for all works near to Magnox services to ensure that adequate mitigation measures are to be deployed.

ECOLOGICAL AND ENVIRONMENTAL

20. Further information is required in order to be able to evaluate impacts on ecology. This request is relevant to JLDP Strategic Policy PS19 and Policy AMG 5; also TAN 5 (6.2, 6.3, 6.4, 6.5 etc.), various protected species legislation, and the Environment Wales Act 2016 duty for the Council to seek to conserve and enhance biodiversity whilst carrying out its functions.

a) Tables and maps are required to illustrate how habitats and species are projected to be affected over the timeframe of the proposal. These should cover all relevant phases of the proposed works at appropriate time intervals, for the whole site, including ecological mitigation areas. These should be presented such as to allow users to follow, for example, how the total areas of scrub will lessen on the clearance areas in relation to their creation at the mitigation areas (in both tables and maps, with ha figures). For the tables and maps, it should be clear what areas of habitat will be available for relevant species groups at key stages of the proposals. Tables should cover timings of translocation in relation to areas of habitat which will be available, and also shown on maps (for example, area x in ha to be cleared of reptiles in year 1 and translocated to area y, in ha). We are seeking to understand what degree of continuity there will be in terms of available habitat areas on the site, in order to be better able to assess the projected impacts. This request is mainly relevant to Terrestrial Ecology, but should also be considered where relevant for impacts on Marine Ecology. (We note that maps of projected noise levels over the site have been provided, and our request includes maps which will show how habitats over the sites will change also.)

b) Acknowledgement of existence, and due consideration of local Wildlife Sites G13 Arfordir Mynydd y Wylfa – Trwyn Penrhyn and G12 Trwyn Pencarreg

c) This request is relevant to JLDP Strategic Policy PS19 and Policy AMG 6; also TAN 5 (5.5), and the Environment Wales Act 2016 duty for the Council to seek to conserve and enhance biodiversity whilst carrying out its functions. (Background: Candidate Wildlife Sites were included in the JLDP (constraints map). The designation is not allocated through the JLDP process itself as such, but their inclusion is both informative and, upon adoption of the JLDP by full Council, those sites which have been surveyed deemed to be formalised, and thereafter no longer 'candidate' sites. Wildlife Sites are protected by Policy AMG 6. Whilst Horizon had objected to the inclusion of Wylfa Head, the site (G13), as well as G12 are thus now Wildlife Sites. (On the existence of some candidate sites after the JLDP process, a footnote on p176 of the JLDP explains that sites which have not been surveyed will remain candidate until surveyed. G12 and G13 have been surveyed, and are listed on

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p282 Appendix 7 of the final JLDP as 'Wildlife Sites'.) The application documents refer to local Wildlife Sites, mainly denying G13 but acknowledging G12 as 'candidate', although there is inconsistency in the approach:

d) ES, chapter 14, Table 14-5 states '…Wylfa Head is not a statutory or non-statutory site for nature conservation…'; Tables 14-13 and 14-18 do not include the site, neither has it been considered in relation to Section 14.11.3 (last sentence). The site does however appear on Figure 16-4 as 'Wylfa Head Candidate Wildlife Site'; Trwyn Pencarreg is acknowledged for example in Tables 14-13 and 14-18, and Figure 14-3 (but as Trwyn Pencarreg Candidate Wildlife Site).

e) Both sites (and any others that may be relevant) need to be acknowledged as Wildlife Sites (and not 'candidate'), and considered for impacts accordingly in the application. It appears for example that the proposed security fencing will come to the very edge of (or possibly within) G13. This situation should be assessed and clarified. It may be acceptable for a supplementary document to be produced in relation to Wildlife Sites, with updated versions of all relevant maps on which Wildlife Sites should appear.

f) Ecological Surveys are required as follows:

(i) 14-01 Phase 1 Habitat Survey: Executive Summary (no page number) has recommendations for further study of meadows, heathland, saltmarsh and shingle beach, field boundaries. Question: Was there any specific follow-up for the issues raised?

(ii) 14-08 NPS Site Great Crested Newt Baseline Surveys 2014. Executive Summary: Surveys recommended for 2017 season. Question: Where are the results and report from these 2017 surveys to inform the case? Question: This Report does not include Conclusions or Recommendations sections – are such sections available?

21. Results of grassland fungi survey – autumn 2017 is required.

22. Set-up specifications for species receptor areas (Notable Wildlife Enhancement Area & Mynydd Ithel) are required.

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CONTACT US:
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