

SCOPING OPINION

PROPOSED NUCLEAR POWER STATION AT WYLFA, ANGLESEY

April 2010



Independent, impartial, inclusive

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1.0 INTRODUCTION

Purpose

- 1.1 This is the Infrastructure Planning Commission's (the Commission's) Scoping Opinion (the opinion) in respect of the content of the environmental statement for a proposed nuclear power station at Wylfa, Anglesey by Horizon Nuclear Power – a joint venture by RWE AG (RWE) and E.ON AG (E.ON).

Background

- 1.2 On 23 November 2009, the Commission received a scoping report submitted by Horizon Nuclear Power under Regulation 8 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 (SI 2263) (the EIA Regs) in order to request a scoping opinion.
- 1.3 The EIA Regs enable an applicant, before making an application for an order granting development consent, to ask the Commission to state in writing its formal opinion on the information to be provided in an environmental statement.
- 1.4 Horizon Nuclear Power has notified the Commission under Regulation 6(1)(b) of the EIA Regs that it proposes to provide an environmental statement in respect of the proposed nuclear power station at Wylfa. Therefore, the proposed development is determined to be an EIA development in accordance with Regulation 4.
- 1.5 Before adopting an opinion the Commission (or the relevant authority) must take into account:
- 'the specific characteristics of the particular development;
 - the specific characteristics of the development of the type concerned;
 - the environmental features likely to be affected by the development'.

(EIA Regs 8 (9))

- 1.6 This opinion sets out what information the Commission considers should be included in the Environmental Statement (ES) for the proposed nuclear power station. The opinion has taken account of the EIA Regs; the nature and scale of the development; the nature of the receiving environment and current best practice in the preparation of environmental statements.
- 1.7 The Commission has also taken account of the responses received from the statutory consultees. It has carefully considered the matters

addressed by the applicant and has used professional judgement and experience in order to come to this opinion.

- 1.8 This opinion is made in response to the information in the scoping report submitted with Horizon Nuclear Power's request for a scoping opinion under Regulation 8 of the EIA Regs and should be read in conjunction with the scoping report. When considering any application for a development consent order the Commission will not be precluded from requiring additional information in connection with the ES submitted with that application. The Commission will take account of relevant legislation and guidelines when considering the ES.

Other Regulatory Regimes

- 1.9 The applicant should clearly state what regulatory areas are addressed in the ES. The applicant should ensure that all relevant authorisations, licences, permits and consents that are necessary are described in the ES and are obtained to enable operations to proceed. Also it should be clear that any likely significant effects of the proposed development which may be regulated by other statutory regimes have been properly taken into account in the environmental impact assessment (EIA).
- 1.10 It will not necessarily follow that the granting of consent under one regime will ensure consent under another regime. For those consents not capable of being included in an application for consent under the Planning Act 2008, the applicant should note that a level of assurance or comfort from the regulatory authorities, that the design or plan is acceptable and likely to be approved, will be required before making an application for development consent to the Commission.
- 1.11 Further recommendations as to how to address other regulatory regimes is provided in paragraph 2.16 of this opinion.

Consultation

- 1.12 The Commission has a duty under Regulations 2(1)(a) and 8(6) of the EIA Regs to consult widely before adopting an opinion. A full list of the consultation bodies is given at Appendix 1. The list of respondents, with copies of those comments is given at Appendix 2 to which reference should be made.
- 1.13 The responses received have been considered by the Commission and taken into account in preparing this opinion. The ES must demonstrate consideration of points raised by the consultees. It is recommended that a table is provided in the ES summarising the scoping responses from the statutory consultees and where they are considered in the ES.

- 1.14 Any subsequent responses will be copied and forwarded to the applicant and should be given due consideration by the applicant in carrying out the EIA.

Structure of the Opinion

- 1.15 The opinion is structured as follows:

Section 2 Information on the Proposed Development;

Section 3 General Content of the Environmental Statement;

Section 4 EIA Topics;

Section 5 Presentation of the Environmental Statement;

Section 6 Other Information; and

Appendices.

2.0 INFORMATION ON THE PROPOSED DEVELOPMENT

Background

- 2.1 The proposed development will need to be defined in sufficient detail in the ES to permit a robust assessment of the adverse and positive impacts to be undertaken. Any infrastructure required off-site should be assessed.
- 2.2 The descriptions in the ES should be accurate.
- 2.3 Regulation 8(3) of the EIA Regs states that a request for a scoping opinion must include:
 - i. a plan sufficient to identify the land;
 - ii. a brief description of the nature and purpose of the development and of its possible effects on the environment;
 - iii. such other information or representations as the person making the request may wish to provide or make.

Description of the Development

- 2.4 Figures 1 and 2 in the scoping report show the ownership boundary and site location, the permanent development boundary and nominated area. The nominated area corresponds with the area identified as one of the ten sites included in the draft National Policy Statement (NPS) EN-6 as potentially suitable for a new nuclear power station.
- 2.5 Section 1 of the applicant's scoping report provides a high level description of the development:
 - a power station incorporating nuclear reactors with a combined generating capacity of up to 5.3GW;
 - construction stage areas and facilities, including a marine off-loading facility (MOLF);
 - infrastructure and ancillary facilities associated with the operation of a nuclear power station site including cooling water infrastructure;
 - electricity transmission infrastructure;
 - interim waste storage facilities;
 - access roads;
 - landscape and biodiversity initiatives and mitigation measures associated with the construction and operation of a new power station.

2.6 Section 2 describes the development in terms of:

- reactor building;
- safeguard buildings;
- electrical and control buildings;
- turbine hall;
- cooling water pump-house, intake and outfall structures;
- station auxiliaries possibly including water treatment plant, sewage treatment plant, auxiliary boiler house, administration building, visitor/training centre, maintenance and stores building, standby diesel generators and ancillary development;
- grid substation;
- interim waste storage facilities;
- security fencing;
- construction areas and facilities;
- landscape and biodiversity areas.

- 2.7 It should be noted that if the development changes substantially during the EIA process the applicant should consider the need to request a new scoping opinion.
- 2.8 The main components of the power station are shown in the scoping report on two conceptual layouts, which illustrate two and three reactors, depending upon the choice of reactor. There are two reactor designs – the Westinghouse Electric Company's WEC AP 1000 and AREVA's UK EPR. The conceptual layouts show either three Westinghouse AP 1000 reactors (Figure 3) or two AREVA EPR reactors (Figure 4).
- 2.9 The text of the scoping report (paragraph 2.2) differs from the illustrations and describes the power output in terms of four Westinghouse AP 1000 reactors and three AREVA EPR reactors. These options would provide a combined generating capacity of up to 5.3 GW (as identified in paragraphs 1.3 and 2.2, as well as under the grid connection agreements (paragraph 2.4)).
- 2.10 It is not illustrated how the larger number of reactors would be accommodated on the nominated site.
- 2.11 Support and administration buildings for either choice of reactor are located along the proposed entrance road, although more and larger buildings are associated with the AP1000 units. Otherwise the options are broadly similar. The locations for both layouts lie to the south of the existing station.

Comment

- 2.12 The development being proposed is not clearly identified, ie. whether it is two, three or four reactors; or the type of reactor. No information is given in the scoping report as to the dimensions of the buildings, although Figure 6: Landscape and Visual Preliminary ZVI has assumed the Westinghouse reactors to be 73m high and the AREVA EPR as 62m high.
- 2.13 The dimensions and locations of the buildings and structures should be clearly described. Given the large scale of many of the proposed structures these alone will be important considerations for the EIA. It will be important to consider their colour and form in addition to other matters. Lighting proposals should also be described.
- 2.14 Two types of reactor technology have been identified for potential use, but neither has yet been finalised.
- 2.15 The Commission would need to be satisfied that the matters raised by the Health and Safety Executive, in response to the consultation on the scoping report, regarding processes and flood risk assessment have been clarified.
- 2.16 The applicant will need to satisfy the Commission that the development does not pose an unacceptable risk to humans or the environment during and after the development and following decommissioning of the site and this should be demonstrated in the ES. Whilst radioactive discharges will be a matter for other regulatory regimes, it is considered important to explain such matters in the ES and how these will be addressed.
- 2.17 It is recommended that design parameters should be sufficient to allow for minor variations in the scheme design, but not so great that any variations would effectively constitute a substantial departure from the scheme. The ES should make clear that any changes to the development within the proposed parameters would not result in significant effects that have not previously been identified. The EIA should be carried out on the basis of the most likely design and should identify the worst case in terms of environmental impacts.
- 2.18 Timescales for the development and the activities should be identified for all stages: these include construction; operation; and decommissioning.
- 2.19 The Commission would expect the ES to include a clear description of all the aspects of the development, at the construction, operation and decommissioning stages. These include:

- Land use requirements;
 - Site preparation;
 - Operational requirements including the main characteristics of the production process and the nature and quantity of materials used, as well as waste arisings;
 - Removal of stored radioactive wastes once a final disposal facility is available;
 - Emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc).
- 2.20 The Commission considers that the ES should contain information on the study of alternative schemes for the site. This includes the main reasons for the choice of the proposed number of reactors taking into account the environmental effects.

The Surrounding Environment

- 2.21 The existing environment as identified in the scoping report describes the tidal range and the geology and topography of the site, as well as the drainage regime.
- 2.22 Designated sites identified in the vicinity (paragraph 4.1.2) include:
- Cemlyn Bay SAC;
 - the Ynys Feurig, the Skerries and Cemlyn Bay SPA;
 - Henborth Local Nature Reserve;
 - Cae Gwyn and Tre'r Gof Fen SSSIs;
 - Cemlyn Bay SSSI (SAC and SPA);
 - Cae Gwyn and Llanbadrog – Dinas Gynfor SSSI and Henborth SSSI.
- 2.23 There is reference elsewhere in the scoping report to Menai Straits and Conwy Bay SAC, and Lleyn Peninsular and Sarnau SAC, as well as the North Anglesey Heritage Coast and Anglesey Area of Outstanding Natural Beauty (AONB). Cestyll Garden (Grade II on Cadw/ICOMOS Register of Parks and Gardens of Special Historic Interest in Wales) ‘borders the site of the proposed development’ (paragraph 4.4.2 of the scoping report).
- 2.24 It should be noted that the draft NPS EN-6 refers to Liverpool Bay SPA and Puffin Island SPA.
- 2.25 One known area of contamination is noted in the scoping report which states that further surveys are to be considered to address any other areas of contamination.

3.0 GENERAL CONTENT OF THE ENVIRONMENTAL STATEMENT

Regulatory Background and Good Practice Guidance

3.1 An environmental statement is a statement:

- '(a) that includes such of the information referred to in Part 1 of Schedule 4 as is reasonably required to assess the environmental effects of the development and of any associated development and which the applicant can, having regard in particular to current knowledge and methods of assessment, reasonably be required to compile; but
- (b) that includes at least the information required in Part 2 of Schedule 4'.

(EIA Regs regulation 2)

3.2 The EIA Regs Schedule 4 Parts 1 and 2 set out the information for inclusion in an ES. Part 2 sets out the minimum requirements and is included below for reference:

Schedule 4 Part 2

- a description of the development comprising information on the site, design and size of the development;
- a description of the measures envisaged in order to avoid, reduce and, if possible, remedy significant adverse effects;
- the data required to identify and assess the main effects which the development is likely to have on the environment;
- an outline of the main alternatives studies by the applicant and an indication of the main reasons for the applicant's choice, taking into account the environmental effects;
- a non-technical summary of the information provided [*under the four paragraphs above*].

3.3 Schedule 4 Part 1 sets out the aspects of the environment likely to be significantly affected by the development which should include 'in particular, population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape and the inter-relationship between the above factors' (paragraph 19).

3.4 Traffic and transport is not specified as a topic for assessment under Schedule 4. However, in line with good practice the Commission

considers it is an important consideration *per se*, as well as the source of further impacts in terms of air quality and noise and vibration.

- 3.5 Effects on people are proposed in the scoping report to be considered in terms of socio-economic effects and public access and recreation. The potential effects on human health and well being, as well as potential effects on local demographics, should also be considered.
- 3.6 The scoping report for Wylfa has considered the environment under the following topics:
 - Geology, hydrogeology and hydrology;
 - Flood risk;
 - The marine environment;
 - Landscape and visual effects;
 - Terrestrial ecology;
 - Archaeology and cultural heritage;
 - Traffic and transport;
 - Noise and vibration;
 - Air quality and dust;
 - Public access and recreation;
 - Socio-economic effects.
- 3.7 The Commission considers these topics encompass those matters identified in Schedule 4 Part 1 paragraph 19 of the EIA Regs although notes that greater emphasis should be placed in the ES on the inter-relationship between these factors.
- 3.8 The methodology to undertake the assessment should be based on up to date regulations and good practice and should be agreed with the relevant consultees. Again, where this is not possible, a reasoned justification should be given in the ES.

Physical Scope

- 3.9 Details of the scope are provided in respect of each of the EIA topic areas.
- 3.10 In general the EIA should consider:
 - the nature of the proposal being considered;
 - the relevance in terms of the specialist topic;
 - the breadth of the topic;
 - the physical extent of any surveys or the study area;
 - temporal scope (timescale); and
 - the potential significant impacts.

- 3.11 The study area should include at least the whole of the application site and for certain topics will need to be wider. The study area for each specialist topic should be clearly defined and determined by establishing the physical extent of the likely impacts in accordance with good practice.
- 3.12 The Commission recommends that the physical scope of the study areas should be identified under all the environmental topics and should be sufficiently robust in order to undertake the assessment.
- 3.13 The Commission considers that the study areas should be agreed, with the relevant statutory consultees and local authorities and where this is not possible this should be stated clearly in the ES and a reasoned justification given.

Trans-boundary Effects

- 3.14 The Commission recommends that consideration should be given in the ES to any likely significant effects on the environment of another Member State of the European Economic Area. In particular, the Commission recommends consideration should be given to discharges to the air and sea and to potential impacts on migratory species. This is particularly relevant in terms of the likely impacts on the Irish Sea.

Temporal Scope

- 3.15 The assessment should consider all phases of the use:
 - environmental impact during construction works;
 - environmental impacts on completion/operation of the development;
 - environmental impacts a suitable number of years after completion of the development in order to allow for traffic growth or maturing of any landscape proposals; and
 - decommissioning.
- 3.16 The suitable assessment years should be agreed with the relevant statutory consultees.

Baseline

- 3.17 The baseline should describe the position from which the impacts of the development are measured. The baseline should be chosen carefully and, where possible, be consistent between topics. Where a generic baseline date cannot be established, various points in time may be used – providing these are representative – with an explanation given as to how this affects the assessment. In all cases the baseline should be considered in terms of the sensitivity and capacity of the receiving environment.

- 3.18 Baseline topic and data source(s) should be set out together with any survey work undertaken with the dates.
- 3.19 Section 3.4 of the scoping report states that whilst survey work will be conducted during the period 2009-2011 the baseline will be 2013, as this is when the work is anticipated to commence. The scoping report assumes that the environmental conditions will be similar to when the baseline information was collected.
- 3.20 The Commission notes that conditions will be monitored and considers that particular care should be taken with this approach in the light of both the decommissioning works at the existing station and the need to take account of other likely changes. These changes may include traffic levels associated with the removal of wastes from the site once a long term repository becomes available.

Identification of Impacts and Method Statement

Legislation and Guidelines

- 3.19 Reference should be made to best practice and any standards, guidelines and legislation that have been used to inform the assessment. This should include guidelines prepared by relevant professional bodies.
- 3.20 The regulatory requirements that apply to the proposed development must be included where relevant to each topic – all relevant legislation, permit and licences required should be listed.
- 3.21 The ES should demonstrate consistency in terms of all relevant local, regional and national (and where appropriate international) planning and environmental policy.

Impact Significance

- 3.22 In considering the significance of impacts, the EIA Regs require the identification of the 'likely significant effects of the development on the environment' (Schedule 4 Part 1 paragraph 20). Therefore it is imperative to define the meaning of 'significance' and for significant impacts to be clearly identified.
- 3.23 Evidence to facilitate understanding of the methodology should be included in the ES. The methodology to be used should be set out fully. The ES must set out clearly the interpretation of 'significant' in terms of each of the EIA topics and in terms of cumulative impacts.

- 3.24 It is noted that paragraph 3.5 of the scoping report explains the levels of significance that would be used are: major; moderate; minor and negligible. Consideration should be given as to how helpful this number of categories would be both in terms of managing the assessment process and in terms of decision making. The Commission understands that it may not always be possible to state categorically that an impact is either ‘significant’ or ‘not significant’ (irrespective of whether this is positive or negative) as described under the EIA Regs Schedule 4 Part 1, but considers that for the ES to aid the decision making process, the terminology in the categories should be meaningful. In particular it is unclear what interpretation should be placed on an impact identified as both ‘negligible’ and ‘significant’.
- 3.25 It is essential that ‘not significant’ should be a category, and it is recommended that it may also be appropriate to include ‘neutral or no impact’.

Potential Environmental Impacts

- 3.26 The proposed EIA topics identify potential impacts and mitigation. Some topic areas in the scoping report are set out in greater detail than others. These are considered in this opinion under the section on EIA topics.

Inter-relation and Combined Impacts

- 3.27 Impacts on the same receptor should be taken into account. These occur where a number of separate impacts, eg. noise and air quality, affect a single receptor such as fauna.
- 3.28 Reference is made in the scoping report to ‘combined effects’ and the Commission considers that the combined effects of the development should not be overlooked. Whilst the scoping report refers to the individual EIA topic chapters (section 3.7), there is no reference as to how the inter-relation and combined impacts of these topics will be assessed, for example noise and dust and ecology. The ES should not be a disparate group of technical reports but rather a comprehensive report addressing the environmental impacts of a proposal as a whole.

Cumulative Impacts

- 3.29 The ES should describe the current situation and the proposed development within the context of the existing station and its decommissioning activities, as well any other proposals in the vicinity. In line with best practice the assessment should consider a ‘worst case’.
- 3.30 Section 3.6 of the scoping report considers cumulative assessment in terms of other developments in the area. The Commission agrees with

the proposal to identify other major development in the area through consultation with the local planning authorities.

Associated development

- 3.31 The ES should give equal prominence to any development which is associated with the proposed nuclear power station (such as off-site access works and any new overhead electricity lines or deviation of existing overhead lines) to ensure that all the impacts of the proposals are assessed.
- 3.32 Associated development in Wales does not fall within the legal definition of 'associated development' as set out in Section 115 of the Planning Act and will not fall to be determined by the Commission. Nonetheless, the applicant should note that associated development should be assessed as part of the ES.
- 3.33 The applicant should distinguish between development for which development consent will be sought and any other development. This distinction should be clear in the ES.

Alternatives

- 3.34 The ES should set out an outline of the main alternatives studied by the applicant and provide an indication of the main reasons for the applicant's choice, taking account of the environmental effect (Schedule 4 part 1 paragraph 18).
- 3.35 Alternative sites do not need to be assessed but other matters should be included, such as alternative design options, means of dealing with radioactive waste management and the secure interim storage and alternative mitigation measures. The justification for the final choice and evolution of the scheme development should be made clear.
- 3.36 The submitted scoping report identifies the development in terms of two to four reactors. The ES should provide information on the preferred choice and number(s) of reactors and justify the reasons for the choice in terms of potential impacts.

Mitigation Measures

- 3.37 Mitigation measures may be considered in terms of how they address adverse impacts: namely to avoid, reduce, and compensate for such impacts. There will also be the opportunity for enhancement measures. The role of the mitigation measures should be identified in the specialist sections (Schedule 4 part 1 paragraph 21). Mitigation measures should not be developed in isolation as they may benefit more than one topic area.

- 3.38 The effectiveness of mitigation should be apparent. Only mitigation measures which are a firm commitment should be taken into account as part of the assessment.
- 3.39 The Commission suggests that it would be appropriate to consider opportunities for combined mitigation measures with the works associated with the decommissioning of the existing adjacent power station.

Consultation

- 3.40 It is recommended that any changes to the scheme design in response to consultation should be addressed in the ES.
- 3.41 It is recommended that the applicant provides preliminary environmental information to the local authority when consulting on the draft Statement of Community Consultation (SoCC) for comment under s47 of the Planning Act 2008. Consultation with the local community will be carried out in accordance with the SoCC which will state how the applicant intends to consult on the preliminary environmental information (this term is defined in the EIA Regs under 'Interpretation'). This preliminary information could include results of detailed surveys and recommended mitigation actions. Where effective consultation is carried out in accordance with s47 of the Planning Act 2008, this could usefully assist the applicant in the EIA process – for example the local community may be able to identify possible mitigation measures to address the impacts identified in the preliminary environmental information.

Environmental Management

- 3.42 The ES should clearly state where environmental management plans (EMP) will be utilised (during construction and operation) to control the proposed development within the parameters of the ES. It is considered best practice to outline the structure of the EMP which should be adopted during construction and operation.
- 3.43 Details should be included in the EMP as to how waste will be managed on the site, especially during the construction phase, including methods to reduce the production of waste.

Information provided in the Scoping Report

- 3.44 The scoping report acknowledges the emphasis of the new regime (established as a result of the Planning Act 2008) on 'front loading', information collection and the importance of submitting a comprehensive application for a development consent order.

4.0 EIA TOPICS

General

- 4.1 The Commission considers that the topics identified in the scoping report encompass those matters identified in Schedule 4 Part 1 paragraph 19 of the EIA Regs.
- 4.2 Specific comments in addition to the matters set out in the scoping report are set out below under each of the topic headings. Consideration should also be given to the scoping responses provided in Appendix 2.
- 4.3 Matters are not scoped out unless specifically addressed and justified by the applicant and confirmed as being scoped out by the Commission.

Geology, Hydrogeology and Hydrology (Section 4.1 of the scoping report)

- 4.4 A series of potential impacts have been set out in the scoping report with the most significant relating to Tre'f Gof Fen SSSI which has been identified as the key water environmental receptor in relation to both groundwater and surface water.
- 4.5 It is understood that the methodology for this topic is still in development but it is stated it will be based on a 'source-pathway-receptor' framework and development of a site conceptual model.
- 4.6 This section of the scoping report deals with ground conditions, surface and groundwater, and soils. The scoping report states that the existing environment will be described. The scoping report does not detail the physical extent of the study area but clearly this must be drawn widely enough to enable a robust assessment.
- 4.7 Mention should be made of the Dinorwic fault line, which is part of the Menai Strait fault line. Although the Commission acknowledges that the seismic risk is more appropriately assessed as part of site licensing by the Nuclear Installations Inspectorate (NII).
- 4.8 Potential sources and pathways of contamination should be identified. Reference should also be made to the cumulative impacts associated with the decommissioning of the existing power station and how these could be managed.
- 4.9 Any potential impacts on the Ynys Mon Abstraction Management Strategy (CAMS) area should be addressed.

- 4.10 No mention is made of potable water supplies and possible licence abstraction limitations. This should be clarified. Increases in water demand during construction should be addressed as well as the potential increase in waste water production.
- 4.11 Information should be included regarding the Wylfa site water supply (raw/potable) and the supplier (DCWW/private); the potential impacts on the sewerage network, the Waste Water Treatment Works and potential to use a private treatment works; and information on Welsh Water assets that may be affected by the development. Details of how sewage will be treated should be included and the potential impact of any discharges on the environment.

Flood Risk (Section 4.2 of the scoping report)

- 4.12 The western tip of the site is potentially at risk from tidal/fluvial flooding. The majority of the site is classified as Zone A (based on the Environment Agency Flood Zones). A small area of the site which is not defined is classified as Zone B which is stated to relate to Tre'r Gof Fen SSSI.
- 4.13 The physical extent of the study area has not been defined, again this will need to be identified and should be sufficiently robust in order to undertake the assessment.
- 4.14 The potential impacts identified include the potential for flooding that will impede the operational and emergency access to the site on the A5025. The report does not mention potential impacts resulting from site decommissioning.
- 4.15 Reference is made in the scoping report to the possibility of seawall protection being built across the face of the site at Porth-y-Pistyll to the south of the site. However, there is no mention of assessing either this structure or the site's activities on the coast and coastal habitats (including a coastal processes assessment) in order to inform the flood risk assessment. It would be advisable to include a topic on coastal processes within the ES.
- 4.16 Reference is made to the need for the assessment to take into account the effect of climate change and coastal change over the planned lifetime of the power station through operation and decommissioning. It will need to be demonstrated that the site is safe in terms of flood risk and flood management over its lifetime including consideration of climate change.
- 4.17 The assessment should include the implications of implementing any new flood protection measures arising from the loss of floodplain in order to protect the access routes to the power station.

The Marine Environment (Section 4.3 of the scoping report)

- 4.18 The scoping report acknowledges that marine and terrestrial ecology are considered separately but are closely related, but does not explain how this relationship will be addressed in the ES. The Commission would expect the marine environment assessment to refer also to other topics undertaken as part of the assessment including air quality and dust; noise and vibration; lighting; hydrogeology and soils; and groundwater as well as to consider any potential existing or future contamination.
- 4.19 A species survey of marine ecology should be undertaken.
- 4.20 The Commission will need to be satisfied that the assessment has included a sufficiently wide area, in order to undertake the assessment. It should be noted that Welsh Ministers will be responsible for Marine Licensing when the relevant provision of the Marine and Coastal Access Act 2009 are brought into force.
- 4.21 In terms of both marine and terrestrial ecology, the ES should investigate the potential for introducing non-native organisms to the site, such as on machinery or soils and identify any appropriate mitigation measures as necessary.
- 4.22 Detailed information will be necessary to inform the choice of the location for the marine offloading facility and for the cold water (CW) intake and outfall. In particular information will be required relating to how the impacts at the CW intake and outfall will be monitored. The potential disturbance to reef communities and habitats should be addressed. The effects on coastal processes as a result of sediment transport should be considered. The impacts of the intake/outfall structures on sediment transport should be addressed.
- 4.23 The ES should assess the impact of impingement and entrainment on marine organisms. The potential harm to fish from cooling water abstraction should be addressed.
- 4.24 The Commission considers that any surveys should be undertaken in accordance with best practice e.g. optimal times and number of visits. Any sediment analysis should consider the potential for chemical and radionuclide contamination and the need for mitigation measures.
- 4.25 There is a potential impact on designated sites due to the proposed abstraction of seawater for cooling purposes and the subsequent discharge of cooling water as well as the location of the marine off-loading facility. Some of the impacts associated with both the direct and indirect effects of thermal discharge are identified. However, the report does not state what level of discharge is expected and how this relates to the existing discharge levels of Wylfa A power station, which would

be helpful. It is important to explain the impact of the proposals on the Irish Sea.

- 4.26 Light spill could include construction activities either at sea or on shore. The EIA will need to determine the impact of light pollution on biodiversity and, in particular, breeding birds. This issue needs to be fully addressed with the ES including appropriate mitigation measures.

Landscape and Visual Effects (Section 4.4 of the scoping report)

- 4.27 The EIA will need to be carried out in relation to the location, height design and numbers of reactors comprised within the development, as well as the details of other large buildings and structures.
- 4.28 The effects of lighting both on and off shore should be considered and the means of mitigating visual impacts on nearby properties, especially at Tregele and Cemaes.
- 4.29 The report acknowledges that there will be an overlap between the construction of the new power station and the decommissioning of the existing power station.
- 4.30 The report stresses that the significance of impacts will depend on the type of reactor selected which will affect the height, size and number of reactors.
- 4.31 The extent of the study area has not been specified. It proposes to focus on key viewpoints that will be agreed in consultation with statutory consultees. This should include any potential impacts on the Anglesey AONB and North Anglesey Heritage Coast, together with potential impacts on historic parks and gardens.
- 4.32 The significance of the impact is to be assessed during construction, at completion and at approximately 15 years after completion. The assessment should also consider the impacts during the decommissioning phase.
- 4.33 Cumulative and combined impacts should not be overlooked, in particular the need to consider the potential landscape and visual implications of transmission infrastructure, and the decommissioning works including transport movements at the existing nuclear power station.
- 4.34 Mitigation measures should not be considered in isolation. The Commission considers opportunities should be taken to develop measures in association with the existing station. The opportunity for ecological and landscape mitigation and enhancement should be addressed in parallel with the measures proposed for the decommissioning of the existing station.

Terrestrial Ecology (Section 4.5 of the scoping report)

- 4.32 A Phase 1 Habitats and Protect Species survey was undertaken in September 2009. Further species-specific surveys have been identified and should be undertaken at an appropriate time of year.
- 4.33 The physical extent of the study area has not been set out in the report. Consideration should be given to identifying a wide area, which is sufficiently robust.
- 4.34 Reference to other specialist topics should be made, eg landscape, noise and vibration; and air quality and dust.
- 4.35 There is a potential impact on designated sites due to potential changes to the hydrological regime with the key receptor identified as Tre'r Gof Fen SSSI. New drainage systems may result in a physical loss of habitats as well as the possibility of increased sediment loading in waterways.
- 4.36 The construction of the power station could cause disturbance to important ecological areas and to bird populations using the site and its surroundings, including the foreshore. Therefore the numbers and distribution of breeding, feeding and roosting birds in relation to the development site will need to be established.
- 4.37 The ES should consider the loss, damage or fragmentation of internationally designated sites and the loss of priority species using these habitats.
- 4.38 The ecological impact assessment is stated to assess impacts only during the construction and operational phases. It will also need to include the decommissioning phase.
- 4.39 The risk of accidental pollution of the local environment should be considered (for example spillage of oil or other fuels).
- 4.40 Measures to enhance the biodiversity should be considered and linked to any landscape mitigation.

Archaeology and Cultural Heritage (Section 4.6 of the scoping report)

- 4.41 The potential impacts relate to the impacts on buried archaeological remains that may be present. These should be considered both within the proposed site boundary and off shore. The report also makes mention of the buried or waterlogged archaeological remains that may be directly or indirectly affected by changes to the hydrogeology regime.

- 4.42 The setting of designated cultural heritage resources could be affected; this includes historic parks and gardens, historic buildings, historic landscapes and archaeological sites. There is no indication of level of significance.
- 4.43 No specific mitigation measures are suggested to preserve in situ archaeology or record and remove any identified archaeology during construction and these should be identified. Consideration should be given as to how any impacts will be monitored.

Traffic and Transport (Section 4.7 of the scoping report)

- 4.44 The assessment should consider road (including pedestrian, equestrian and cycle movements), rail and shipping. The impacts on water navigation and recreational boating should also be considered, including impacts during decommissioning.
- 4.45 Alternative transport options and abnormal loads should be addressed, particularly during the construction and decommissioning phases, as well as the impact of transporting radioactive waste.
- 4.46 The methodology for the assessment should be agreed with the Isle of Anglesey County Council and the Welsh Assembly Government. This should include the details of the relevant years for the assessment. The applicant may also wish to consider discussing abnormal loads and any transport management plan with the local police.
- 4.47 The impact on the Menai Suspension Bridge and the Britannia Bridge should be addressed, particularly in terms of congestion and loading and in view of the decommissioning works being undertaken at the existing station and possible effects of additional traffic on tourism.
- 4.48 The assessment should consider all phases of the use, including the decommissioning of the station.
- 4.49 Appropriate mitigation measures should be identified including an explanation of the alternatives considered and a justification of the chosen option.

Noise and Vibration (Section 4.8 of the scoping report)

- 4.50 It is noted that consultation will take place with the environmental health officer at the Isle of Anglesey County Council. The Commission considers it very important to establish an appropriate and agreed baseline, in view of the proposed decommissioning of the existing station and the implications of works taking place at both sites concurrently. The noise environment will be different when the existing station is operational, closed or undergoing decommissioning and should be taken into account when assessing noise levels.

- 4.51 Noise levels should be considered not only on site but also off site along access roads and local footpaths.
- 4.52 The assessment should take account of the traffic assessment and also provide information to inform the ecological assessments, both terrestrial and marine.
- 4.53 The scoping report refers to 'blasting' (section 4.8.2) and effects need to be considered, especially in relation to the existing power station and local residents. Consideration should be given to monitoring noise complaints.

Air quality and dust (Section 4.9 of the scoping report)

- 4.54 Potential short term increases in greenhouse gases during the construction phase should be addressed.
- 4.55 Air quality and dust levels should be considered not only on site but also off site along access roads and local footpaths.
- 4.56 The assessment should take account of the traffic assessment in terms of increased emissions and also provide information to inform the ecological assessments, both terrestrial and marine. There is the need to consider potential related effects on national and European-designated wildlife sites due to an increase in airborne pollution especially during construction.
- 4.57 Consideration should be given to monitoring dust complaints.

Public access and recreation (Section 4.10 of the scoping report)

- 4.58 The ES should take account of the location of public rights of way, including footpaths, bridleways and byways and should clearly set out impacts on them. It is important to minimise hindrance to them where possible. In the scoping report public footpaths are also considered as part of the traffic and transport assessment, which covers pedestrian infrastructure.
- 4.59 A clear indication should be given as to how the development will affect the existing recreational facilities and what mitigation would be appropriate in these circumstances.

Socio-economic Effects (Section 4.11 of the scoping report)

- 4.60 The assessment should consider impacts on the local labour market and the availability of an appropriately skilled workforce during the construction phase, especially in view of the demands for workers associated with the decommissioning of the existing power station.

The combined effects of both developments should be assessed in respect of the availability of construction workers and their accommodation.

- 4.61 Additional pressure on local services should be considered, including the demand for additional services such as health services and schools. Security should be addressed. This would include all phases of the development and should include potential disruption of the local population.
- 4.62 Impacts on the local community should be considered. This should include the impact on the housing market; the impact on the tourist market and the impact on local culture and the Welsh language, including the effects of longer term employment opportunities in the area.
- 4.63 The assessment should cover all stages including decommissioning of the new station.

5.0 PRESENTATION OF THE ENVIRONMENTAL STATEMENT

Introduction

- 5.1 The environmental statement (ES) should be an aid to decision making. It should be laid out clearly with a minimal use of technical terms. The ES should provide a clear objective and realistic description of the likely significant impacts of the scheme. The information should be presented so as to be comprehensible to the specialist and non-specialist alike.
- 5.2 It is recommended that the ES be concise with technical information placed in appendices.

Balance

- 5.3 The ES should be balanced, with matters which give rise to a greater number of, or more significant, impacts being given greater prominence. Where few or no impacts are identified, the technical section may be much shorter, with greater use of information in appendices as appropriate.

Presentation

- 5.4 All paragraphs in the ES must be numbered. This is for ease of reference. Appendices must be clearly referenced, again with all paragraphs numbered. All figures and drawings should be clearly referenced.

Cross References and Interactions

- 5.5 All the specialist reports in the ES should cross reference their text to other relevant disciplines. Interactions between the specialist reports is essential to the production of a robust assessment, as the ES should not be a collection of separate specialist reports, but rather a comprehensive assessment of the development.
- 5.6 As set out in EIA Regs Schedule 4 Part 1 paragraph 23, the ES should include an indication of any technical difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information.

Terminology and Glossary of Technical Terms

- 5.7 A common terminology should be adopted. This will help to ensure consistency and ease of understanding for the decision making process. For example, ‘the site’ should be defined and used only in terms of this definition so as to avoid confusion with, for example, the wider site area or the surrounding site.
- 5.8 A glossary of technical terms should be included in the ES.

Summary Tables

- 5.9 In order to assist the decision making process, the applicant may wish to consider the use of tables to identify and collate the residual impacts after mitigation. This would include the EIA topics, combined and cumulative impacts.
- 5.10 A table setting out the mitigation measures proposed would assist the reader and would also enable the applicant to cross refer mitigation to specific provisions proposed to be included within the draft Order.
- 5.11 The ES should also demonstrate how the assessment has taken account of this opinion and other responses to consultation. This may be most simply expressed in a table.

Bibliography

- 5.12 A bibliography should be included in the ES. The author, date and publication title should be included for all references.

Non Technical Summary

- 5.13 The EIA Regs require a Non Technical Summary (EIA Regs Schedule 4 Part 1 paragraph 22). This should be a summary of the assessment in simple language. It should be supported by appropriate figures, photographs and photomontages.

6.0 OTHER INFORMATION

Habitats – Appropriate Assessment

- 6.1 Potential impacts could affect four national and internationally protected nature conservation sites i.e. Cemlyn Bay SAC and SSSI; Ynys Feurig, The Skerries and Cemlyn Bay SPA.
- 6.2 On the basis of the information included in the scoping report, the Commission considers that it will be necessary to conduct an Appropriate Assessment to predict the impacts of a project on a European protected site. The applicant must provide the Commission with information in order to ascertain whether the proposal could adversely affect the integrity of a protected site.

APPENDIX 1

LIST OF CONSULTATION BODIES FORMALLY CONSULTED BY THE COMMISSION DURING A SCOPING EXERCISE FOR THE PROPOSED WYLFA NUCLEAR POWER STATION SITE

APPENDIX 1

LIST OF CONSULTATION BODIES FORMALLY CONSULTED BY THE COMMISSION DURING A SCOPING EXERCISE FOR THE PROPOSED WYLFA NUCLEAR POWER STATION SITE

Consultee	Organisation
The Welsh Ministers	The Welsh Ministers
The Scottish Executive	The Scottish Government
The relevant Northern Ireland Department	Northern Ireland Assembly
The relevant Regional Planning Authority	Welsh Assembly Government
The Health and Safety Executive	The Health and Safety Executive
The relevant Strategic Health Authority	Betsi Cadwaladr University Health Board
The relevant fire and rescue authority	North Wales Fire and Rescue Authority
The relevant police authority	North Wales Police Authority
The relevant parish council	Llanbadrig Community Council Cylch-y-Garn Community Council Mechell Community Council Tref Alaw Community Council Rhosybol Community Council Amlwch Community Council
The Environment Agency	The Environment Agency
The Equality and Human Rights Commission	The Equality and Human Rights Commission
The Commission for Sustainable	The Commission for Sustainable

Development	Development
Royal Commission on Ancient and Historical Monuments of Wales	The Royal Commission on Ancient and Historic Monuments of Wales
The Countryside Council for Wales	The Countryside Council for Wales
The Joint Nature Conservation Committee	The Joint Nature Conservation Committee
The Maritime and Coastguard Agency	The Maritime and Coastguard Agency
The Marine and Fisheries Agency	The Marine and Fisheries Agency
The Civil Aviation Authority	The Civil Aviation Authority
The relevant Highways Authority	Isle of Anglesey County Council (Cyngor Sir Ynys Mon)
The Rail Passengers Council	Passenger Focus
The Disabled Persons Transport Advisory Committee	The Disabled Persons Transport Advisory Committee
The Coal Authority	The Coal Authority
The Office of Rail Regulation and approved operators	The Office of Rail Regulation and approved operators: Amey LG Ltd Babcock Rail Ltd Balfour Beatty Rail Infrastructure Services Ltd Balfour Beatty Rail Plant Ltd Carillion Construction Ltd Colas Rail Ltd DB Schenker Rail (UK) Ltd EWS DB Schenker Direct Rail Services Ltd Fastline Ltd Freightliner Ltd

	GB Railfreight Ltd Great Central Railway Ltd (Nottingham) Network Rail (CTRL) Ltd Jarvis Rail Ltd Rail Express Systems Ltd Network Rail Infrastructure Ltd Wensleydale Railway PLC Stagecoach South Western Trains Ltd Serco Ltd
The Gas and Electricity Markets Authority	OfGEM
The Water Services Regulation Authority	OfWAT
The relevant waste regulation authority	Isle of Anglesey County Council
The relevant internal drainage board	Welsh Water Malltraeth Marsh Internal Drainage District
The British Waterways Board	The British Waterways Board
Trinity House	Trinity House
The Health Protection Agency	The Health Protection Agency
The relevant local resilience forum	North Wales LRF
Relevant Statutory Undertakers	Relevant Statutory Undertakers: Section 8 ALA 1981 Network Rail Infrastructure Ltd (see above) BRB Residuary Limited

	<p>Magnox Electric Plc</p> <p>Magnox North Limited</p> <p>Stena Line Ports (Holyhead Port)</p> <p>Isle of Anglesey County Council (Senior Maritime Officer)</p> <p>NATS En Route plc (NERL)</p> <p>Royal Mail</p>
	<p>Section 16 ALA 1981</p> <p>Betsi Cadwaladr University Health Board (see above)</p> <p>Welsh Ambulance Service NHS Trust</p> <p>Anglesey Public Health Team (from 1 October 2009 the responsibilities of Anglesey Public Health Team were assumed by the Betsi Cadwaladr University Local Health Board as part of the reform of the NHS in Wales (a copy of the letter sent to Betsi Cadwaladr was sent to Anglesey Public Health Team))</p> <p>North West Wales NHS Trust (from 1 October 2009 the responsibilities of North West Wales NHS Trust were assumed by the Betsi Cadwaladr University Local Health Board as part of the reform of the NHS in Wales (a copy of the letter sent to Betsi Cadwaladr was sent to North West Wales NHS trust))</p> <p>NHS Dental Services</p>
	<p>Deemed Statutory Undertakers</p> <p><u>Water and Sewage Undertaker</u> – Welsh Water</p>
	<p><u>Gas Transporters</u> –</p> <p>Wales and West Utilities Ltd</p> <p>British Gas Pipelines</p> <p>Energetics Electricity Limited</p> <p>Energetics Gas Limited</p>

	ES Pipelines Ltd ESP Connections Ltd ESP Networks Ltd ESP Pipelines Ltd Fulcrum Pipelines Limited GTC Pipelines Limited Independent Pipelines Limited Intoto Utilities Limited National Grid Gas Plc (NTS) National Grid Gas Plc (RDN) Northern Gas Networks Limited Quadrant Pipelines Limited Scotland Gas Networks Plc Southern Gas Networks Plc SP Gas Limited SSE Pipelines Ltd The Gas Transportation Company Limited Utility Grid Installations Limited
	<u>Electricity Transmitters with CPO Powers –</u> National Grid (Plant Protection) National Grid Electricity Transmission Plc
	<u>Electricity Generators with CPO Powers –</u> Magnox Electric PLC
	<u>Electricity Distributors with CPO Powers –</u> Energetics Electricity Limited ESP Electricity Limited

	Independent Power Networks Limited The Electricity Network Company Limited ECG (Distribution) Limited EDF Energy (IDNO) Limited SP Manweb The Environment Agency (see above)
The Crown Estate Commissioners	The Crown Estate Commissioners
The Forestry Commission	The Forestry Commission Wales
Local Authorities (s.43)	Isle of Anglesey County Council (Cyngor Sir Ynys Mon)
	Conwy County Council
	Snowdonia National Park Authority
	Gwynedd County Council

Non-Prescribed Consultee	Organisation
Welsh Language Board	Welsh Language Board
CADW	CADW
Joint Transport Authority	Taith

APPENDIX 2

LIST OF RESPONDENTS RECEIVED BY 23 APRIL 2010 AND COPIES OF REPLIES

APPENDIX 2

LIST OF RESPONDENTS

Betsi Cadwaladr University Local Health
Cadw
Civil Aviation Authority
Conwy County Council
Countryside Council for Wales
Environment Agency Wales
ESP Group
Fulcrum Pipelines Ltd
Gwynedd County Council
Health and Safety Executive
Isle of Anglesey County Council
Jarvis Rail Ltd
Joint Nature Conservation Committee
Magnox North Ltd
Marine and Fisheries Agency
Navigation Directorate
Network Rail
North Wales Fire and Rescue Authority
North Wales Police
Northern Ireland Planning Service
Southern Gas Networks plc
Snowdonia National Park Authority
Welsh Language Board
Welsh Water

APPENDIX 2 (continued)

COPIES OF REPLIES

Ian Collinson
Infrastructure Planning
Commission
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Ein cyf / Our ref:

Eich cyf / Your ref:

Telephone: 01745 534203

Gofynnwch am / Ask for: Neil Bradshaw

E-bost / Email: Neil.Bradshaw@wales.nhs.uk

Dyddiad / Date: 23rd December 2009

Dear Mr Collinson

**Environmental Impact Assessment Scoping Report
Proposed Nuclear Power Station, Wylfa, Anglesey, North Wales**

Betsi Cadwaladr University Health Board (BCUHB) welcomes the opportunity to comment on the Scoping Report for the Environmental Impact Assessment (EIA) in respect of a proposed new nuclear power station at Wylfa.

Within the Scoping Report there are several references to the Isle of Anglesey Local Health Board as the provider of information to contribute to the ongoing assessment. This should read Betsi Cadwaladr University Health Board which came into being on 1st October 2009. We would be grateful if this can be acknowledged in all future documents.

In formulating our response we have worked in partnership with the Public Health Wales Trust and the Health Protection Agency.

We recognise that the scoping report represents an early stage in this process and we look forward to participating fully as the consultation programme develops.

We have some specific comments to make in relation to the developer's Scoping Report, which are discussed below in detail. However, our principal observations at this early stage relate to our strong belief that a comprehensive Health Impact Assessment (HIA) is required, to complement the Environmental Impact Assessment (EIA).

We note that a number of key aspects which would need to feature within an HIA are well described within the EIA scoping document, including socioeconomic effects, and key environmental impacts such as air quality and dust, traffic and transport, and noise and vibration. However, there is a clear opportunity to capitalise on the rigour of the further assessments proposed by including them within a robust HIA framework. This would have the added value of increasing local ownership of the conclusions drawn from the different assessments.



Health Impact Assessment

Whilst we appreciate that HIA is not a statutory requirement for current energy applications, we would strongly advocate its use in relation to the proposed Wylfa development.

The recently published Welsh Public Health Strategic Framework, Our Healthy Future,¹ signals Welsh Assembly Governments intention to strengthen the use of HIA within the planning system across Wales.

There has been much public perception of risk associated with living adjacent to a nuclear power station including specific interest group and media interest in relation to the impact of radiation on the population in North Wales.

Such concerns have resulted in the Committee on Medical Affects of Radiation in the Environment (COMARE) issuing a variety of public statements in relation to the North Wales Coastal area:

<http://www.comare.org.uk/statements/NorthWales.htm>

<http://www.comare.org.uk/statements/Trawsfynydd.htm>

This further highlights the importance of ensuring that a full and open public engagement and consultation process is undertaken in relation to any proposals. This will enable public perception of risk and benefits to be openly and appropriately considered.

HIA aims to use a combination of approaches to judge the potential impact of any project in terms of its potential impact on the health of a population and, crucially, the distribution of those effects within the population. Key to its effectiveness is that it must be conducted openly and in partnership with those affected by, or with an interest in the project and its outcomes.

The Welsh Assembly Government has supported the development of the Welsh Health Impact Support Unit over the past 5 years, and the robust methodology developed and tested by the unit and implemented both locally and nationally, offers a sound basis on which to build. Further information is available from the WHIASU website.

<http://www.wales.nhs.uk/sites3/home.cfm?OrgID=522>.

Specific Comments

Our specific comments in relation to the EIA Scoping Report are as follows:

1. We are aware that specialist advice in respect of radiation dose and emissions has been sought from the Health Protection Agency. The possibility of cumulative radiation effects from nuclear plants is an important issue to consider and we note that key aspects of the future development, including the choice of specific type of nuclear

¹ Welsh Assembly Government Our Healthy Future December 2009

<http://wales.gov.uk/docs/phs/publications/healthyfuture/090331ourhealthyfutureen.pdf>



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CYMRU
NHS
WALES

Bwrdd Iechyd Prifysgol
Betsi Cadwaladr
University Health Board

reactor, are yet to be finalised, and thus insufficient supporting information is available for this to be fully assessed at the current time. However, when engaging with the population in relation to such issues as estimated dosage levels from all radiation sources within Wylfa, it will be important to ensure that exposure to vulnerable groups (notably children) is specifically addressed. Similarly it will be important for the local population to be provided with information on other exposure sources for comparison, notably radon.

2. We welcome the recognition in paragraph 4.11.2 of the need to undertake assessment of the potential impact of the development on local services including health care provision. The Board would be very happy to contribute to the undertaking of such assessments.
3. The Scoping Report notes the need to consider the assessment in relation to the new development alongside the ongoing decommissioning work at Wylfa A. We would strongly support the need to ensure that any HIA and EIA processes address the two phases together.
4. The scoping report makes reference to a possible influx of workers required for construction and operation. If approved this development would be a significant project and separate reference should be included in relation to the need for the promotion of opportunities for education, training and employment of the 'local' work force/population so as to maximise positive and sustainable benefits to the 'local' area.
5. Public access, particularly in relation to key walking routes is crucial, not only in terms of the sound health and well being benefits for individuals and communities, but specifically in terms of the Coastal Path in relation to the tourism benefits brought to the Island. The proposed further studies and assessment are welcome and need to consider these wider aspects, or could, again, be included within a detailed HIA.
6. Paragraph 4.11.3 references the proposed use of a variety of national (UK) sources of information to describe the demography and 'health needs' of the local population. This is welcome.

There are other additional sources of information relating to Wales that may be valuable and appropriate to include in describing the local Anglesey and surrounding population. These include

- national information sources on health status e.g. Welsh Health Survey; Health Maps Wales, Statistics Wales
- information from the Welsh Cancer Information and Surveillance Unit(WCISU) <http://www.wales.nhs.uk/sites3/home.cfm?OrgID=242> and Congenital Anomaly Register and Information Service (CARIS) <http://www.wales.nhs.uk/sites3/home.cfm?OrgID=416>



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University Health Board

- demography profiles available from Wales Centre for Health website <http://www.wales.nhs.uk/sites3/page.cfm?orgid=568&pid=37807>

Local information is also available – including the latest Anglesey Health Needs Assessment which has been prepared as part of the statutory Health Social Care and Wellbeing Strategy. <http://www.wales.nhs.uk/sites3/Documents/272/ACF1789.pdf>

The use of such information will facilitate engagement with local statutory organisations, partnerships and local communities.

7. Whilst detailed communication and engagement with the 'local' population on Anglesey is required, clear and open communication with the population of the whole of the North Wales is also recommended.

Yours sincerely

Mr Neil Bradshaw
Executive Director of Planning

Ian Collinson
Infrastructure Planning Commission
Temple Quay House
Temple Quay
Bristol
BS1 6PN

I P C

19 APR 2010

Eich cyfeirnod
Your reference EN010007/Preapp/COR618
Ein cyfeirnod
Our reference A-CAM011-09-qa827534
Dyddiad
Date 15 April 2010
Llinell unlongyrchol
Direct line 01443 336096
Ebost
Email: Suzanne.whiting@wales.gsi.gov.uk

REF:

Dear Mr Collinson

**PROPOSED NUCLEAR POWER STATION AT WYLFA, ANGLESEY
PROPOSAL BY HORIZON NUCLEAR POWER LTD
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS
2009 SI 2263**

Thank you for your letter of 26 March 2010 inviting Cadw to comment on the Infrastructure Planning Commission's Scoping Opinion in respect of the proposal described above.

Cadw would like to suggest the following amendments to the information to be provided in an environmental statement relating to the project:

p.9 The Surrounding Environment

Paragraph 2.22 - the designated historic garden of Cestyll should be included.

p.20 Landscape and Visual Effects

Paragraph 4.28 - this should include Cestyll and its Essential Setting

p.21 Archaeology and Cultural Heritage (section 4.6 of the scoping report)

Paragraph 4.42 - the list of types of sites here should include historic parks and gardens.

Paragraph 4.43 - mitigation measures to minimise the impact of the development on the registered historic garden of Cestyll, and its setting, should be specified.

Yours sincerely

Mrs Suzanne Whiting

Gweinyddu Henebion/Ancient Monuments Administration



Mr Iain Collinson
Case Leader
Infrastructure Planning Commission
Temple Quay House
Temple Quay
Bristol. BS1 6PN

I P C

27 NOV 2009

REF: COR034

25 November 2009

EN01007/Pre App/Segnit
Response

Dear Sir

**Land Adjacent to Wylfa Nuclear Power Station
Proposal by Horizon Nuclear Power
Infrastructure Planning (Environmental Impact Assessment) Regulations 2009
SI 2263 Regulations 8 and 9**

Thank you for inviting CAA to comment on the above proposal.

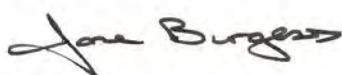
The CAA has no role in assessing environmental factors other than at an aerodrome designated under the Civil Aviation Act for that purpose.

The area in question does not contain any aerodrome so designated. We therefore make no comment on the environmental aspects of the work. We will nevertheless exercise our right under Section 16(5) of the Civil Aviation Act 1982 to draw your attention to the fact that if the site is within the safeguarding area for an airport or aviation technical site (as indicated in any maps issued to you for such purposes) the comment of the airport operations manager or site manager should be sought.

If any high structures are involved please bear in mind that any of 90 metres or more height should be discussed with the Directorate of Airspace Policy, Room K6 Gate 3, CAA House, 45-59 Kingsway, London WC2B 6TE.

For projects which bypass the normal process of application for planning permission, especially those involving trenching or tunneling, or substantial new structures, consult NATS as a matter of routine. The contact for the whole of the UK is Stephen Collett, Senior Systems Engineer, NATS plc, Mailbox 27, NATS Corporate & Technical Centre, 4000 Parkway, Whiteley, Fareham, Hants PO15 7FL.

Yours faithfully



P.P. K RIENSEMA
Head of Strategy & Standards
Aerodrome Standards



Gwasanaethau Rheoleiddio'r / Regulatory Services
Pennaeth Gwasanaeth / Head Of Service
Phillip A Rafferty

I P C

14 DEC 2009

REF:

Rheoli Datblygu / Development Control
Rheolwr Rheoli Datblygu / Development Control Manager - Phil Hardwick
Civic Offices, COLWYN BAY, LL29 8AR
Swyddfeydd Dinesig, BAE COLWYN, LL29 8AR

Infrastructure Planning Commission
FAO Mr I Collinson
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Gofynnwch am / Please ask Neil Walters
for:
 01492575708
 01492512637
 neil.walters@conwy.gov.uk
Ein Cyf / Our Ref: DNW/CLM/ENQ/17033 & CONS 44
Eich Cyf / Your Ref:
Dyddiad / Date: 11/12/2009

Site	Land Adj. Wylfa Nuclear Power Station, Anglesey	Proposal	Construction of Nuclear Power Station (Neighbouring Authority Consultation)
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Dear Sir

I refer to your letter dated 24th November 2009 and would inform you that the details of the scoping report were reported to the planning committee of the Council at its December meeting when it was resolved:

To inform the Infrastructure Planning commission that this Council does not wish to make any formal representation on the content or extent of the scoping exercise other than to place emphasis on the need to fully assess the risks of nuclear fallout at the plant and during transportation to and from the power station.

Yn Gywir / Yours Sincerely

P A Hardwick
Development Control Manager



Prif Swistwrdd / Main Switchboard: 01492 574000
www.conwy.gov.uk/planning www.conwy.gov.uk/cyflwyno
Ni ddyliod cyflwyno dogfennau llys drwy ffacs
Fax not to be used for serving proceedings





Cyngor Cefn Gwlad Cymru

Countryside Council for Wales

CADEIRYDD/CHAIRMAN: JOHN LLOYD JONES OBE PRIF WEITHREDWR/CHIEF EXECUTIVE: ROGER THOMAS

Anfonwch eich ateb at/Please reply to: Mannon Lewis
Ffôn/Tel: 01248 672500
Ffacs/Fax: 01248 679259
Ebost/Email: m.lewis@ccw.gov.uk

Rhanbarth y Gogledd/North Region
Llys y Bont
Parc Menai
BANGOR
Gwynedd
LL57 4BN

Ian Collinson
Infrastructure Planning Commission
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Eich cyf/Your ref: EN010007/Preapp
Ein cyf/Our ref: 1319006/ML/SH39

16.12.09

Dear Ian Collinson,

**LAND ADJACENT TO WYLFA POWER STATION
PROPOSAL BY HORIZON NUCLEAR POWER
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)
REGULATIONS 2009 SI 2263 Regulations 8 and 9
SCOPING RESPONSE**

Thank you for your consultation dated 24.11.09 regarding scoping opinion for land adjacent to Wylfa power station.

In discharging its functions under section 130 of the Environmental Protection Act 1990, the Countryside Council for Wales champions the environment and landscapes of Wales and its coastal waters as sources of natural and cultural riches, as a foundation for economic and social activity, and as a place for leisure and learning opportunities. We aim to make the environment a valued part of everyone's life in Wales.

Please note that our comments are without prejudice to any comments we may wish to make when consulted on any subsequent planning applications or on the submission of a more detailed scoping report or the full Environmental Statement. At the time of any planning application there may be new information available which we will need to take into account in making a formal response to the planning authority.

The scoping report has covered many of the issues of interest to CCW. Outlined below are further areas which need to be addressed as part of the EIA for the proposal.

National Grid connection and transmission infrastructure

We condone the approach of assessing the environmental impact of grid connection and transmission infrastructure. The effect of Grid Connection is a material consideration. The applicant should be able to demonstrate that they have given consideration as to how the power will be transported from Wylfa, its likely impact and whether that impact can be mitigated (e.g. where it is intended to connect to the grid,



Gofalu am natur Cymru - ar y tir ac yn y môr • Caring for our natural heritage - on land and in the sea

Prif Swyddfa/Headquarters

MAES-Y-FFYNNON, PENRHOSGARNEDD, BANGOR LL57 2DW FFÔN/TEL: 01248 385500 FFACS/FAX: 01248 355782

<http://www.ccw.gov.uk>

location of sub stations, the likely route corridor, whether it will cross sensitive areas such as AONB, National Parks, SSSIs, SACs, SPAs etc).

CCW would object to this proposal if the ES did not include an assessment of the environmental impact of the grid connection and the infrastructure associated with power export from the site.

Invasive non native species

The ES also needs to take into account invasive non native species (both terrestrial and marine). Invasive non-native plant and animal species are a threat to UK biodiversity. They can negatively impact on native species and cause damage to the environment. A biosecurity risk assessment is required for the site. This includes a survey to ascertain if alien species are on site and an investigation of the pathways that may carry non-native organisms on to the site (e.g. contaminated machinery, contaminated soil). If alien species are present then a detailed strategy for their control and eradication would be required. CCW would be happy to give further advice on non native species issues.

Abstraction and discharge of cooling water

We would expect the ES to assess the ecological significance of impingement and entrainment on marine organisms. It is unclear if this is the intent in the scoping report. We would welcome further discussion on this point.

Please do not hesitate to contact me should you wish to discuss any of the issues outlined in this letter.

Yours Sincerely



Casework Team Leader



Gofalu am natur Cymru - ar y tir ac yn y môr • Caring for our natural heritage - on land and in the sea

Prif Swyddfa/Headquarters

MAES-Y-FFYNNON, PENRHOSGARNEDD, BANGOR LL57 2DW FFÔN/TEL: 01248 385500 FFACS/FAX: 01248 355782

<http://www.ccw.gov.uk>

24 DEC 2009



Asiantaeth yr
Amgylchedd Cymru
Environment
Agency Wales

REF:

Mr Ian Collinson - Case Leader
Infrastructure Planning Commission
The Square Temple Quay
Bristol
Avon
BS1 6PN

Our ref: NT/2009/110139/01-L01
Your ref: EN010007/Preapp
Date: 22 December 2009

Dear Mr Collinson

**LAND ADJACENT TO WYLFA NUCLEAR POWER STATION PROPOSAL BY
HORIZON NUCLEAR POWER INFRASTRUCTURE PLANNING
(ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2009 SI2263
REGULATIONS 8 AND 9 WYLFA NUCLEAR POWER STATION.**

Thank you for the opportunity to make comment on the above scoping report received at our office on 4th December 2009.

Please note that our view expressed in this letter is in response to the Scoping Report only and does not represent our final view in relation to any future planning/ permit application made in relation to this site. We reserve the right to change our position should new information, or updates to guidance occur, in relation to any such application.

General Comments:

We recognise that this Scoping Report is high level as decisions have yet to be made on key aspects of the proposal, such as reactor type, flood protection measures and associated infrastructure arrangements. However, the following comments include information and advice on these aspects which should be considered when preparing the EIA.

We note that Horizon's consideration of radioactive discharges appears to be different in the scoping reports for Oldbury and Wylfa. We do not agree with the statement in section 3.7 that the effects of radioactive discharges do not need to be considered in the EIA. Whilst radioactive discharges will be assessed in detail for Environmental Permitting, the EIA should describe how the baselines will be measured and reference the relevant regulatory process. We recommend the EIA includes a radiological section.

Environment Agency
Ffordd Penlan Parc Menai, Bangor, Gwynedd, LL57 4DE.
Customer services line: 08708 506 506
Email: enquiries@environment-agency.gov.uk
www.environment-agency.gov.uk

Cont/d..



I have set out further detailed comments laid out in the order of the scoping report section.

Within the project outline it is highlighted that the nuclear development is expected to include a number of associated developments including access roads and highways improvements. The impacts of these associated developments will need to be addressed in the EIA. Due to the limited information included in the scoping report it is not possible to comment on their impacts.

Since this scoping report was produced, Central Government has released the draft National Policy Statements EN 6 (Nuclear power generation) and EN1(draft National Policy Statements for Energy Infrastructure). Developers need to be aware of the requirements within these documents and address them in the EIA process.

Table 1.2

It should be noted that the Article 37 process produces an opinion rather than an approval.

Flood Risk - 4.2

Consistent with TAN 15 the Environment Agency has strategic and specific flood risk management roles and we comment in that context. Further to this on nuclear sites the risks of flooding are regulated by the Health and Safety Executive as part of the site's safety case.

We endorse that a detailed Flood Consequence Assessment is required. The Flood Consequence Assessment will need to demonstrate that the site is safe over its lifetime and the consequences of flood risk and flood management to be tested against maximum credible climate change scenario.

Surveys and Investigations - Table 6.1

Terrestrial ecology has been considered however, the marine environment has not. A species survey including marine ecology, and potential impacts to cetaceans and seals should also be submitted as part of the EIA.

Habitat and wildlife mitigation should also be considered for integration into the plans.

The thermal impact on the Irish Sea as a result of the proposals will need to be studied in detail.

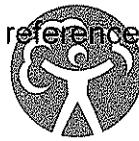
Foul Drainage and Waste

Details of how the sewage generated at the site during construction and the life of the site is to be treated should be included within the EIA along with an assessment of the potential impact of its discharges on the environment.

A full assessment of potential waste generation from the construction process should be submitted. The site waste management plan regulations are in force in England and are expected to be brought in Wales in the near future. Consideration should be given to following a similar plan for preventing the production of waste during the construction phase and to resolve any issues with disposal of waste prior to construction commencing.

In order to facilitate an early response, please quote our reference
Treu i'r gwell
correspondence regarding this matter.
creating a better place

Yours sincerely



Asiantaeth yr
on any future
Amgylchedd Cymru
Environment
Agency Wales

MISS RUTH PRICHARD
Planning Liaison Officer/Swyddog Cydlynus Cynllunio

Direct dial 01248 48 4067

Direct fax 01248 670561

Direct e-mail Ruth.Prichard@Environment-Agency.gov.uk

End

3



22 APR 2010



REF:

Mr Ian Collinson - Case Leader
Infrastructure Planning Commission
The Square Temple Quay
Bristol
Avon
BS1 6PN

Our ref: NT/2009/110139/02-L01
Your ref: EN010007/Preapp

Date: 21 April 2010

Dear Mr Collinson

**LAND ADJACENT TO WYLFA NUCLEAR POWER STATION PROPOSAL BY
HORIZON NUCLEAR POWER INFRASTRUCTURE PLANNING
(ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2009 SI2263
REGULATIONS 8 AND 9 WYLFA NUCLEAR POWER STATION.**

Thank you for referring the Scoping Opinion (December 2009) for the above proposal, which was received by the Environment Agency on the 26th March 2010.

The comments we submitted in response to the Scoping Report (November 2009) have not been included with the Scoping Opinion documentation and are enclosed for your information. However we are satisfied that the issues raised in our response, which were also highlighted by other statutory bodies, have been considered and included with the Scoping Opinion.

We look forward to receiving the Environmental Statement for consideration in due course.

Yours Sincerely,

MISS RUTH PRICHARD
Planning Liaison Officer/Swyddog Cydlynw Cynllunio

Direct dial 01248 48 4067
Direct fax 01248 670561
Direct e-mail Ruth.Prichard@Environment-Agency.gov.uk



Hannah Pratt

Subject: FW: Proposed Nuclear Power Station at Wylfa, Anglesey - EN010007/Preapp/COR617

From: Alan Slee [mailto:alans@espipelines.com]

Sent: Monday, March 29, 2010 1:02 PM

To: IPC Enquiries

Subject: Proposed Nuclear Power Station at Wylfa, Anglesey - EN010007/Preapp/COR617

Dear Sir or Madam,

EN010007/Preapp/COR617

**Environmental Impact Assessment, Proposed Nuclear Power Station at
WYLFA, ANGLESEY (LL67 0DH)**

Further to your communication to E S Pipelines Ltd, ESP Networks Ltd, ESP Electricity Ltd and ESP Connections Ltd dated 26 March 2010 I can confirm that our businesses have no comments at this stage.

Regards,

Alan Slee

Operations Manager

DD 01372 227567
Mobile 07766 802070
Fax 01372 386203



Hazeldean,
Station Road,
Leatherhead
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[MAP](#)

<http://www.espipelines.com>

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T 0845 641 3060
F 0845 641 1894
E enquiries@fulcrum.co.uk
I www.fulcrum.co.uk



Your Reference: EN010007/Preapp/COR617

Date: 30 March 2010

IPC

31 MAR 2010

REF:

Ian Collinson
Infrastructure Planning Commission
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Dear Mr Collinson

RE: Proposed Nuclear Power Station, Wylfa, Anglesey

Thank you for your request for information about Fulcrum Pipelines Limited's pipes and equipment.

We can confirm that Fulcrum Pipelines Limited do not currently have any existing pipes or equipment on or around the above site address.

Please note that other Gas Transporters may have plant in this locality which could be affected by your proposed works.

If you have any future requests for information about our plant, please email these to us at FPLplantprotection@fulcrum.co.uk.

If you have any queries regarding this letter please contact your Fulcrum Advisor, Rebecca Smith on 01709 845535, who will be happy to help.

Yours sincerely,

Ian Foster
Asset manager

COR659

**Adran Rheoleiddio / Regulatory Department
Gwasanaeth Amgylcheddol
Environmental Service
Rheolwr / Manager – Gareth Jones**

Gofynnwch am/Ask for: Dafydd Gareth Jones
Tel: (01286) 679 813
Fax: (01286) 673 324
Email: DafyddGarethJones@gwynedd.gov.uk

Ein Cyf / Our Ref: 6/RWY/WYL/2009/DGJ
Eich Cyf / Your Ref: EN010007/Preapp



Ian Collinson
Case Leader
Infrastructure Planning Commission
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Dear Mr Collinson,

**Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 SI 2263 Regulations 8 & 9
Land Adjacent to Wylfa Nuclear Power Station
Proposed Nuclear Power Station**

Thank you for consulting with Gwynedd Council on the initial stages of preparing an Environmental Statement for the above project.

The authority considers that the scoping report provides an adequate framework for environmental assessment and would further agree on the range of topics to be included.

I would be grateful if you could keep me informed of progress and further request that the authority be retained on your consultation list for future developments.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Dafydd Gareth Jones'.

Dafydd Gareth Jones
Uwch Swyddog Cynllunio (Mwynau a Gwastraff)
Senior Planning Officer (Minerals and Waste)

Council Offices
Shirehall Street
Caernarfon
Gwynedd. LL55 1SH
01766 771 000

COR084

Ian Collinson
Case Leader
Infrastructure Planning Commission
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Nuclear Directorate

Steve Gibson

HM Superintending Inspector
New Build Inspection Unit
Nuclear Installations Inspectorate
4S1 Redgrave Court
Merton Road
Bootle

Tel: 0151 951 4954

steve.nsd.gibson@hse.gsi.gov.uk

<http://www.hse.gov.uk/>

Date: 21st December 2009

Head of Division: Mr Colin Patchett

TRIM ref: 2009/501256

Dear Mr Collinson

**LAND ADJACENT TO WYLFA NUCLEAR POWER STATION PROPOSED BY HORIZON
NUCLEAR POWER**

**INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS
2009 Regulations 8 & 9**

Thank you for your letter of 24th November 2009 seeking views on the EIA Scoping Report submitted by Horizon Nuclear Power in respect of land adjacent to the Wylfa nuclear power station.

Environmental Impact Assessments are concerned with projects which are likely to have significant effects on the environment. HSE's principal concerns are the health and safety of people affected by work activities. In broad terms, therefore, HSE cannot usefully comment on the information provided in Environmental Statements, nor the content of EIA Scoping Reports.

However, such reports should not reference measures which would conflict with the requirements of the Health and Safety at Work etc Act 1974 and its relevant statutory provisions, nor should they misrepresent HSE's role in relation to the regulation of nuclear development projects. With regard to the latter, having reviewed the submitted report, we would like to point out two areas of inaccuracy.

Firstly, section 1.6.3, page 12, in describing the Generic Design Assessment (GDA) process says (para 3):

“.....A detailed assessment of the two designs is due to be completed at the end of 2009, and following a period of public consultation in 2010 it is expected that a decision as to

which designs will receive final approval will be made mid 2011. If the reactor designs are judged to be satisfactory, the regulators will issue the following:

- *Design Acceptance Confirmation (NII);*
- *Generic Conceptual Security Plan approval (OCNS);*
- *Statement of Generic Design Acceptability (EA)."*

This does not correctly describe the process that HSE's Nuclear Directorate (which encompasses the Nuclear Installations Inspectorate (NII) and the Office for Civil Nuclear Security (OCNS)) is undertaking and confuses our process with that of our GDA partner regulators, the Environment Agency. It is the Environment Agency which is proposing to consult in 2010 on its conclusions on the acceptability of the two designs which are being subjected to GDA. HSE's Nuclear Directorate will be continuing its assessment process throughout 2010 and will be looking to report on its GDA findings for each design in June 2011. Depending on those findings, for each design HSE may be able to issue a Design Acceptance Confirmation. The Environment Agency is proposing to issue its final view on the acceptability of each design at the same time.

Also, it is not correct to say that the designs will receive "final approval" in mid-2011. The GDA process does not 'approve' the designs for construction: that will be a matter for both regulators to consider in the event of site- and design-specific applications, although the results of GDA will be taken fully into account in coming to any subsequent regulatory decisions.

Secondly, section 4.2.2 (page 31) in relation to flood risk protection, says in para 2:

"....It is understood that when considering flood risk in relation to future nuclear facilities the Health & Safety Executive (HSE) may apply a safety factor of 1.4 to the 1 in 10,000 year flood level which is interpreted as being equivalent to a 1 in 14,000 year flood level"

This is not entirely correct. We expect the design basis for all external hazards to be based on an event with annual exceedence probability of 10^{-4} . This is also known commonly as the 1 in 10,000 year event. We also require a demonstration that there is no disproportionate increase in risk as a result of changes to the design basis (in effect: no "cliff-edge" effects). Some existing nuclear site licensees have often taken the view that in order to achieve this they should apply a 1.4 factor to the design basis event and develop what is often termed a 'margins event'. This has never been an NII requirement, and we have no intention of being so prescriptive.

Yours faithfully

Steve Gibson

Nuclear Directorate

JIM WOODCOCK
Pennaeth Gwasanaeth Cynllunio
Head of Planning Service
CYNGOR SIR YNYS MÔN
ISLE OF ANGLESEY COUNTY COUNCIL
Swyddfa'r Sir
LLANGEFNI
Ynys Môn / Anglesey
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Tel (01248) 752428 Fax (01248) 752412

Ian Collinson (Case Leader)
Infrastructure Planning
Commission
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Gofynnwch am/Ask for: **Mr Meirion Davies**
(01248) 752441 **GMDPL@anglesey.gov.uk**

Ein Cyf./Our Ref : **GMD/642.70a**
Eich Cyf./Your Ref : **EN010007/Preapp**

Dyddiad / Date : 21.12.2009

Dear Sir

**Re: LAND ADJACENT TO WYLFA NUCLEAR POWER STATION
PROPOSAL BY HORIZON NUCLEAR POWER
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)
REGULATIONS 2009 SI 2263 Regulations 8 and 9**

Your letter dated the 24th November 2009 refers.

The County Council recognises the national need for new electricity generating capacity to replace the obsolete power stations currently supplying the UK, and supports the inclusion of Wylfa as a suitable site for new nuclear build, as nominated through the Strategic Siting Assessment process for the draft National Policy Statement (NPS) on nuclear power, currently out for consultation.

Therefore, the opportunity to comment on the EIA scoping report prepared by Horizon Nuclear Power is welcomed. The scoping report document has been carefully examined, and specific issues have been discussed with representatives of Horizon Nuclear Power at a series of exhibitions held locally on Anglesey during November.

As expected, the coverage of environmental and associated topics in the scoping opinion report is very thorough and comprehensive. There is no need to comment on the majority of topics, but the Council has a particular interest in the well-being of local communities, and considers it appropriate to offer some comments on those issues likely to have the most impact locally. Principally, these will be the socio-economic and traffic and transport issues.

Due to their scale and nature, the potential new build proposals could have large-scale direct and indirect impacts upon the area's communities. While the County Council is eager to see that the beneficial socio-economic impacts can be

maximised for Anglesey, as well as the broader area of North West Wales, there is also a responsibility to ensure that potentially negative impacts can be mitigated to safeguard the well being of communities. In order to capitalise on the beneficial opportunities, while mitigating against any negative impacts, there will be a need for communication and collaboration between all parties during the whole timescale that leads up to the commissioning of a new station. The County Council has already embarked on an 'Energy Island' initiative, to grasp the economic opportunities offered by energy generating technologies, and is eager to formalise and resource joint working through that emerging framework, where Horizon Nuclear Power is recognised as a key partner.

It is agreed that the potential socio-economic impacts have been clearly identified, for both the construction and operational phases, but it is felt that detailed work needs to be undertaken to give particular attention to three key aspects of the socio-economic effects, which are :

- Impacts on the local labour market, and
- Impacts on the local housing market
- Impact on the Welsh Language in the communities

Assessment of impacts on the local labour market would need to examine carefully the potential to recruit and train a skilled local workforce, to maximise the economic benefit available to local communities in the North West Wales area. This analysis should be accompanied by an assessment of the magnitude of an in-migrating workforce, on a temporary basis for the construction phase and a more permanent basis for the operational phase, if sufficient skilled personnel are not available locally. This is particularly important, as it leads to an assessment of the accommodation needs of an in-migrating workforce, which can have significant impacts on the local housing market.

A detailed analysis will be required of the potential impacts an in-coming workforce can have on the local housing market. Particular attention should be given to the impacts of short-term accommodation requirements on the buy-to-let market, and on general supply and demand, and equilibrium price levels in the private rented and owner-occupied sectors. There is also the potential impact on the availability of tourist accommodation, which is seasonal but contributes significantly to local incomes.

An assessment of accommodation needs, particularly if there is likely to be displacement of local people, is very important for the planning and housing authority, as it will be necessary to develop a strategy to ease any pressures that might emerge in the local housing market.

A site hostel might mitigate the worst of any local housing pressures, but the Council is aware that economic benefits need to be spread amongst the surrounding communities, and a stimulus to the house building industry could

regenerate rural communities, and create a legacy of affordable housing and community facilities for the longer term.

The establishment of supply chains could also offer opportunities to establish business sites, at a suitable scale, in local communities, leaving a long term legacy of employment locations alongside the provision of affordable homes.

It must also be remembered that Anglesey is a bilingual area, where the impact of major developments on the use of the Welsh language within communities is a particularly sensitive matter. It is customary for major projects to undergo a Welsh Language Impact Assessment, as part of the socio-economic analysis, and this must not be overlooked.

It is acknowledged that these are complex matters, but it is felt that an attempt needs to be made to analyse the interaction between a major development project and the well being of local communities, in an attempt to strike a balance that will bring social and economic benefits to a dispersed local population while at the same time mitigating against any excessive pressures that could prove to be detrimental to those communities.

Another major issue with implications for the well being of communities are the traffic and transport impacts likely to arise from the project. If a major part of the workforce is to be recruited locally, and if a significant number of in-coming workers are to be accommodated off-site, then travel to the site will become a major consideration. Opportunities for travel by means other than the private car need to be fully explored and considered, and ideally a sustainable, low-carbon travel plan needs to be prepared. Alternatives to road transport for personnel and materials, at least for part of the journeys, need to be fully considered, and if any doubts arise about the capacity of local roads to accept additional flows of traffic, then points where improvements become necessary should be clearly identified. The potential to use rail, as referred to in the scoping report, needs to be fully explored.

The major development proposed would have major implications for Anglesey as a local planning authority, since there will be a need to plan ahead for any additional requirements to provide housing and employment sites, accompanied by adequate investment in infrastructure such as sewerage or highway improvements. A clear analysis of additional requirements will be urgently required as a sound evidence base for the authority's emerging Local Development Plan (LDP), which may need to be revised and updated if any significant additional sites need to be identified. To clarify the issues, collaboration between Horizon Nuclear Power and the County Council during the preparation of the EIA will be essential.

Currently, the County Council does not have the necessary resources to effectively deal with the direct and indirect changes that a development of this nature is likely to create, especially since local authority budgets are about to

enter a period of severe difficulty and uncertainty. Urgent discussions are, therefore, needed to consider the prospects for additional resources to be sourced to progress the 'Energy Island Framework', with the potential for entering into a Planning Performance Agreement (PPA) with developers. The County Council's Economic Development Unit is eager to participate fully, to inform and influence the socio-economic baseline study for the EIA, to ensure the proposed development is placed within the wider context of initiatives and programmes aimed at upgrading and regenerating the area's economy in a sustainable way for the long-term.

It is assumed that any environmental issues that might arise in association with the disposal of radioactive wastes will be thoroughly covered in the Environmental Statement, particularly if it emerges that local solutions might have to be sought for the disposal of some low-level radioactive wastes.

Overall, this detailed scoping report is seen as a positive step forward towards the submission of a planning application for a second nuclear power station at Wylfa, and I hope the comments made above will be viewed as a positive contribution towards that process.

Yours faithfully

Head of Planning Service



IPC

17 DEC 2009

REF:

FAO Ian Collinson
Case Leader on behalf of the IPC
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Jarvis Rail Ltd
Meridian House
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YO24 1AW

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www.jarvisplc.com

14 December 2009
Jr/sw/kq/ipc

Dear Mr Collinson

Land Adjacent to WYLFA Nuclear Power Station

I refer to your letter dated 24 November 2009.

I write to advise that Jarvis do not have any comments to make.

Yours sincerely

Karen Quill
Group Estates Administrator

Jarvis plc

Registered office:
Meridian House
The Crescent
York YO24 1AW

Registered in England
No. 2238084



Joint Nature Conservation Committee
Dunnet House, 7 Thistle Place
Aberdeen, AB10 1UZ, United Kingdom
Telephone: 01224 655707
Email: victoria.appleyard@jncc.gov.uk

Ian Collinson
Infrastructure Planning Commission
Temple Quay House
Temple Quay
Bristol
BS1 6PN

By e-mail to ipcenquiries@infrastructure.gsi.gov.uk

Your Ref: EN010007/Preapp

15th December 2009

Dear Ian,

**LAND ADJACENT TO WYLFA NUCLEAR POWER STATION
PROPOSAL BY HORIZON NUCLEAR POWER
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)
REGULATIONS 2009 SI 2263 Regulations 8 & 9**

We received your consultation in relation to the scoping opinion for the above development proposal on 25 November 2009.

JNCC has responsibility for the provision of nature conservation advice in the offshore area. 'Offshore' is defined as beyond 12 nautical miles (nm) from the coastline to the extent of the United Kingdom Continental Shelf (UKCS). Within territorial limits (<12 nm) nature conservation advice is the responsibility of the relevant country agencies these being: Natural England (NE), Countryside Council for Wales (CCW), Scottish Natural Heritage (SNH) and the Council for Nature Conservation and the Countryside (CNCCNI).

This development proposal is not located within the offshore area and does not have any potential offshore nature conservation issues therefore JNCC does not have any comments to make on the scoping report or any future environmental statement.

Yours sincerely,

A handwritten signature in black ink that reads "Victoria Appleyard". There is also a small, thin-lined signature underneath it.

Victoria Appleyard
Offshore Industries Advisor

Hannah Pratt

From: janet.milburn@magnoxnortsites.com
Sent: 11 January 2010 10:17
To: IPC Enquiries
Subject: Response to Scoping Report - Your Ref: ENO10007/Preapp

Attachments: Scoping_Report_Comments_Wylfa_Dec_2009.doc



Scoping_Report_Co
mments_Wylfa_...

Mr Collinson

We provide a response to the Horizon Nuclear Power Environmental Impact Assessment Scoping Report for the Proposed Nuclear Power Station at Wylfa, Anglesey, North Wales. Please accept our apologies for responding outside the 28 days stated in your letter ref: ENO/10007/Preapp, however, we hope you take account of the Christmas break and adverse weather we have all experienced over this timeframe.

I am pleased to provide comments set out in the document below on behalf of Mr Nick Gore, Site Director for Wylfa Power Station, Magnox North Ltd.

(See attached file: Scoping_Report_Comments_Wylfa_Dec_2009.doc)

Please contact me if you require further information.

Kind regards,

Jan

Jan Milburn

Decommissioning Strategy Manager
Wylfa Power Station
Cemaes
LL67 0DH

Tel: 01407 733668
Mobile: 075 289 75199
e:mail: janet.milburn@magnoxnortsites.com

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Views expressed in this email are not necessarily those of Magnox North Limited.

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Correspondents should note that all communications to Department for Communities and Local Government may be automatically logged, monitored and/or recorded for lawful purposes.

Wylfa Power Station Response to IPC / Horizon Nuclear Power Environmental Impact Assessment Scoping Report

Thank you for the invitation to comment on the Environmental Impact Assessment Scoping Report for the proposed nuclear power station at Wylfa, Anglesey, North Wales. Comments are provided as follows:

1. In light of Magnox North Ltd's decommissioning programme it is evident that any works associated with construction of a new nuclear power station adjacent to the current Wylfa site will overlap with decommissioning activities. I welcome the inclusion of an assessment of the cumulative impacts of construction and decommissioning activities in the environmental statement, as outlined in Section 3.6. Where possible this assessment should consider "worst case" scenarios, for example, significant demolition activities concurrent with significant construction activities. In addition, the assessment should consider the cumulative impacts of construction, operation and decommissioning of the new station adjacent to the existing station, throughout the whole of the Wylfa "A" lifecycle. Magnox North will continue to provide information relating to decommissioning plans and their environmental impacts to support this assessment.
2. I note the inclusion of the potential use of explosives as outlined in Section 4.8: Noise and Vibration assessments. If so, there is a need to ensure that effects on the existing Wylfa site are fully considered and appropriate regulatory approvals under the relevant Site Licence Conditions are sought prior to their use.
3. The Socio-Economic Assessment proposed in Section 4.11 should consider and encourage the capability of local training providers to ensure the right skilled resources are available at the right time throughout the power station lifecycle, to help mitigate short, medium and longer term socio-economic effects. It may also be appropriate to identify developing the local supply chain to again support enhancing the short, medium and longer term socio-economic effects. You may also wish to consider the positive effects on Welsh language and culture of longer term employment opportunities in the locality.
4. Page 40, Section 4.4.2 and Page 48, Section 4.6.1: There are several references to the historical Cestyll Gardens that currently lie within the existing power station's landholding. To avoid confusion and to provide clarity, it is suggested that you specifically state that the Gardens are outside the area of development.
5. Page 52, Section 4.7.3: I welcome the inclusion specifically of an assessment of the cumulative impacts on traffic and transport associated with the development of the new site and the decommissioning of the current Wylfa site.
6. It is noted on Page 25, Section 3.4 Baseline Assessment, that it is likely that main construction activities will commence over the period 2013 to 2014, this is likely to coincide with the current Wylfa site continuing to be in its operational phase (ie generating and/or defuelling), it is therefore requested that impacts on this phase are considered to safeguard nuclear, environmental and security compliance.

Hannah Pratt

Subject: FW: PDC 1386 - Land adjacent to Wylfa NPS - EIA Scoping report

From: Christie, Bernard (MFA) [mailto:Bernard.Christie@mfa.gsi.gov.uk]

Sent: Tuesday, December 15, 2009 8:19 AM

To: Ian Collinson

Subject: PDC 1386 - Land adjacent to Wylfa NPS - EIA Scoping report

Good morning Ian

Further to my email of 3/12/09 in which I advised that I was referring your report to colleagues at Cefas and local MFA, some early points raised are as follows:

An EIA will be required under the Marine Works (EIA) Regs 2007 for the building of a new nuclear power station on land adjacent to Wylfa Nuclear Power Station. Part 7 of the Marine Works (EIA) 2007 Regulations refer to projects listed in Annex 1 of the EIA Directive 1985 that require EIAs. Annex 1 projects include the building of new nuclear power stations. Furthermore the Infrastructure Planning (EIA) regulations 2009 also require that an EIA is produced for any National Significant Project. The development of a new nuclear power station is considered to be a Nationally Significant Project and will therefore require a Development Consent Order (DCO) from the Infrastructure Planning Commission (IPC). A formal EIA will be required as part of the request for a DCO.

Furthermore The Habitats Regulations 1994 require an Appropriate Assessment (AA) to be conducted by the 'Competent Authority' before a plan or project that is likely to have a significant effect on designated or candidate Special Protection Areas (SPA) or Special Areas of Conservation (SAC), can be given consent. The proposed new nuclear reactor site is located in the vicinity of several EU/UK environmentally designated areas:

- Cemlyn Bay SAC
- Cemlyn Bay SPA
- Ynys Feurig SPA
- The Skerries SPA
- Henborth SSSI
- Cemlyn Bay SSSI
- Cae Gwyn SSSI
- Tre'r Gof Fen SSSI
- Llanbadrog – Dinas Gyn For SSSI

If there is a likely significant effect on any of these features or a cumulative significant effect then an AA may be likely under the Habitats Regulation 1994. This will need to be assessed before any consent under FEPA 1985 or CPA 1949 is issued. The decommissioning of Wylfa Nuclear Power Station and the proposed new Liquid Natural Gas (LNG) terminal by Cantax at nearby Amlwch may combine to have a cumulative significant effect on nearby SACs and SPAs.

Any Environment Statement (ES) produced by the applicant should have detailed reference to the impact on fisheries and also potential impacts on protected species under Offshore Marine Regulations 2007.

The area in question is fished extensively by inshore fishermen from the nearby ports of Amlwch, Bull Bay, Cemlyn, Church Bay and Holyhead. The fleet is made up approximately 20 – 30 predominantly under 10m licensed and registered fishing vessels prosecuting shellfish fisheries. Lobster and crab are fished close in to the rocky shore in the spring summer and prawns in the autumn and winter. Whelks are fished all year round anywhere from the inshore area to several miles off shore. There are queen and king scallop beds in the vicinity. This area is well known for its prolific bass fishing around the warm water outlet of Wylfa Nuclear Power Station. This area could be considered for a bass nursery area designation, particularly if the new cooling outfall pipe adds to the already abundant bass fishery. Any ES will need to show the impact and mitigation of the new cooling system on the local environment. It also needs to be borne in mind that there are nearby nursery areas for demersal flat fish south of the proposed works.

The ES should cover any navigational issues or concerns the new power station may have for marine users. For example a new cooling pipeline to remove the warm water extending up to 3km from the site would in all likelihood cross fishing grounds. This may interfere with towed gear and cause a danger to fishing vessels.

As soon as I have any further comment to make, I will of course be in touch again.

Regards

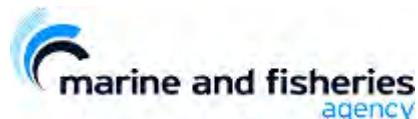
Bernie

Bernard Christie

Marine Consents Case Officer

Marine Environment Team

0191 202 3849



Citygate

Newcastle upon Tyne

NE1 4WH

The Marine and Fisheries Agency is going through considerable change over the next few months with the relocation of its headquarters to Newcastle. Our aim is that, regardless of change, it is 'business as usual'. Please continue to use this email address and telephone number. However if you do experience any problems in making contact please call our hotline, 020 7979 8519, available during business hours – Monday to Friday 9-5 pm.

Marine & Fisheries Agency

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FOOD AND ENVIRONMENT PROTECTION ACT 1985 (AS AMENDED) & COAST PROTECTION ACT 1949 (AS AMENDED)

FORMAL SCOPING REQUEST UNDER THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2007 FOR PROPOSED NUCLEAR POWER STATION AT WYLFA, ANGLESEY BY HORIZON NUCLEAR POWER

With reference to the request for scoping comments regarding the proposed Nuclear Power Station at Wylfa, Anglesey by Horizon Nuclear Power.

Document (s) reviewed

Environmental Impact Assessment Scoping Report – Proposed Nuclear Power Station at Wylfa, Anglesey, North Wales – November 2009

Description of the project

The proposed project is for the construction of a new Nuclear Power Station with a generating capacity of 5.3GW on land adjacent to the existing nuclear power station at Wylfa, Anglesey; the land proposed for the development covers an area of approximately 232ha. The construction and commissioning phases of the power station are expected to last around 9 years.

There are proposed construction operations that may fall within or impact the marine environment are;

- Construction of a temporary marine offloading facility to enable transportation of large plant modules (exact location not yet determined)
- Construction of seawall protection at Porth-y-Pistyll immediately south of existing station
- Construction of a new coolant water outtake and intake (exact locations not yet determined)
- Potential dredging activity at location of marine offloading facility, coolant water outtake and coolant water intake.

The operation of the power station may involve the preferred option of direct water cooling; pumping water from a suitable water body through the turbine condensers and returning the warmed water directly back to the water body with a typical temperature increase of 8°C to 14°C. It is expected that a new configuration of tunnels and pipe work associated with the cooling water system could extend from the shoreline to open sea for up to 3km.

It is expected that the new power station would be operational for 60 years and decommissioning of the power station is estimated to last for approximately 20 years. Decommissioning is the subject of a separate consent regime which also requires its own environmental impact assessment.

Review of the proposed Environmental Impact Assessment

Having reviewed the report I am content that it satisfactorily identifies the key issues related to the construction and operational impacts of the project. I have provided a number of minor comments and recommendations as below. As part of the review of this scoping report I have consulted internally with colleagues with specialist knowledge in coastal and physical processes, benthic ecology and fish ecology / resources.



I note that a number of aspects of the works have not yet been defined, such as the location of the outfall and marine offloading facility. Once determined these will need to be better defined within the EIA.

I would also note that as this project is situated next to an existing power station, it is important than any existing site-specific survey or monitoring data is utilised, such site-specific information will be a valuable resource for the impact assessment.

I would like to emphasise that we will be more than happy to provide more detailed comment/advice regarding any future proposed survey designs in support of the EIA.

Coastal Processes

The methodology used to assess the Coastal Processes appears to be robust with a preliminary ADCP survey being used to define the key locations for longer term fixed moorings. Also the duration (1 year) is to be applauded. As well as using the existing “Class A” tide gauge network a tide gauge should be established to establish any local variation with the long term record at Holyhead (nearest Class A site).

As Numerical models will be used to assess the size and concentration of the “footprint” of both the thermal plume and any “biocides plume” a robust calibration and validation procedure is required. This has been already mentioned (section 4.3.4) but needs to be emphasised.

The measurement, modeling and implications of non-tidal forcing (identified by this document) will be key in assessing the alteration of the “tidal thermal/biocide plume”.

The High resolution numerical models in Section 4.3.4 need to be of sufficiently high resolution in order to correctly resolve small scale eddies shed by headlands etc.

The Bathymetric and Benthic surveys need to be combined into a Habitat map of the area potentially impacted by the thermal/biocide plume and the “sensitive receptor” species identified.

Similarly, the Bathymetric, sidescan sonar, Particle size data and current meter data need to be combined into a sediment transport map showing patterns and pathways of sediment and any sources/sinks of sediment. This is required to assess the impacts of the intake/outfall structures on sediment transport.

Dredging and disposal

The potential for dredging works is identified within the scoping document. A sediment quality survey is suggested which will identify any contaminants of concern. It is important that any sediment analysis also considers the potential for dredging and therefore any consideration of contamination at depth, this should be considered in terms of both chemical and radionuclide contamination. The requirement for a suitable disposal site should also be considered, this will be dependent on the type and volume of material to be disposed. Existing sites are located in the region, consideration to be given as to whether a new site needs to be characterised. Cefas will be able to advise further on disposal sites once the dredging requirements have been identified in more detail.

Data sources

As part of the fisheries assessment, Cefas hold some publically available data which may be of use in any studies within the EIA, the following sources of information may therefore be of use:

- The Cefas publication 'The coastal fisheries of England and Wales, Part V: a review of their status 2005-6' provides information on the local coastal fishery activity, including vessels that operate from Holyhead. Noting that this 2005-6 is the most up to date version of the Cefas report, further information may be obtained from the local fisheries inspector (Welsh Assembly Fisheries) or the North Wales and North Western Sea Fisheries Committee.
 - <http://www.cefas.co.uk/publications/techrep/tech140.pdf>
- More generally in terms fisheries information there is information available on the Cefas website on surveys undertaken and specific species within the Irish Sea area:
 - <http://www.cefas.co.uk/data/fisheries-information/irish-sea-stocks.aspx>
- In relation, the Cefas publication 'Distribution and relative abundance of demersal fishes from beam trawl surveys in the Irish Sea (ICES division VIIa) 1993-2001' provides detailed fisheries data.
 - <http://www.cefas.co.uk/publications/techrep/tech120.pdf>
- Cefas undertake commercial fisheries surveys within the Irish sea.
 - [http://www.cefas.co.uk/data/fisheries-information/surveys/irish-sea-and-bristol-channel-survey-\(september---october\).aspx](http://www.cefas.co.uk/data/fisheries-information/surveys/irish-sea-and-bristol-channel-survey-(september---october).aspx)

Conclusion

I am generally content with the issues identified within the scoping report, a number of technical recommendations are made with regard to coastal processes and potential general data sources for fisheries information. I would emphasise the importance of using available site specific information, and Cefas would be happy to provide more detailed comment/advice regarding any future proposed survey designs in support of the EIA.

The items highlighted in this letter should be considered in the Environmental Impact Assessment process, and we would like to see the outcome of our suggestions in the subsequent Environmental Statement. However we would not see this letter as a definitive list of all Environmental Statement / Environmental Impact Assessment requirements and other subsequent work may prove necessary.

Hannah Pratt

From: Navigation Directorate [Navigation.Directorate@thls.org]
Sent: 04 December 2009 15:31
To: IPC Enquiries
Subject: ENVIRONMENTAL IMPACT ASSESSMENT - SCOPING OPINION. WYLFA NUCLEAR POWER STATION EN010007/PREAPP

Dear Mr. Collinson,

ENVIRONMENTAL IMPACT ASSESSMENT - SCOPING OPINION. WYLFA NUCLEAR POWER STATION EN010007/PREAPP

With reference to your letter dated 24th November, 2009, concerning the above, in the interests of the safety of navigation taking into account any environmental matters, Trinity House Lighthouse Service have no objections to the proposed application from Horizon Nuclear Power for the proposed development of a Nuclear Power Station at Wylfa as detailed.

If any structures are to be built in the sea (marine offloading facility, cooling water intakes / outakes are mentioned in the scoping report), an assessment would need to be made as to the marking in the interests of navigation during construction, operation, decommissioning / removal and thereafter if any obstruction to navigation remains or the effect any proposed works have on any existing aids to navigation.

Provision would need to be made in the permissions eventually given if this project goes ahead for construction / operation to include for marking to be provided as specified by Trinity House Lighthouse Service in conjunction with the Isle of Anglesey Borough Council as the Local Lighthouse Authority for the area.

Yours sincerely,

Martin Thomas - Navigation Support Officer
Trinity House London tel: 020 7481 6920
email: navigation.directorate@thls.org

Trinity House
Tower Hill
LONDON
EC3N 4DH

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From: Clarke Diane [mailto:Diane.CLARKE@networkrail.co.uk]
Sent: Wednesday, April 14, 2010 9:09 AM
To: IPC Scoping Opinion
Subject: Isle of Anglesey - IPC Scoping Opinion for Proposed Nuclear Power Plant Wylfa

FAO Ian Collinson, Case Leader

Isle of Anglesey – Scoping Opinion for Proposed Nuclear Power Plant Wylfa

Thank you for informing Network Rail of the above Scoping Opinion, Network Rail has the following comments to make:

➤ The presently disused Gaerwen-Amlwch line (Engineers Line Reference GLA), runs to within 4½ miles of the proposed site, with the closest location on the route being at the former Rhosgoch Siding site. There is currently a Feasibility Study under way with Network Rail, commissioned by the Welsh Assembly Government, to investigate the potential to reopen the Gaerwen-Llangefni portion of the route for Passenger Train operation. Consequently, when devising strategies for the proposed traffic flows connected with the decommissioning of the existing Wylfa Power Station and the construction and future operation of the New Replacement Wylfa Power Station consideration should be strongly given towards the Environmental and other wider Socio-Economic benefits of maximising the use of Rail Transport wherever possible in preference to Road, including the resumed Rail Freight use of a fully rehabilitated Gaerwen-Amlwch Railway Line to service the Power Station Decommissioning and Replacement activities, and the future New Power Station operation and maintenance, in association with the usage of the current but more distant sited Valley Nuclear Flask Siding facility on the Holyhead Mainline.

Regards

Diane Clarke

Town Planning Technician LNW

Network Rail

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Network Rail Infrastructure Limited registered in England and Wales No. 2904587, registered office Kings Place, 90 York Way London N1 9AG



I P C

24 DEC 2009

REF:

Fao: Mr Ian Collinson
Infrastructure Planning Commission
Temple Quay House
Bristol
BS1 6PN

Gwasanaeth Tân ac Achub
Fire and Rescue Service

Simon A Smith
Prif Swyddog Tân / Chief Fire Officer

Eich Cyf/Your Ref: EN010007/Preapp
Elin Cyf/Our Ref: MP/AC W07-Mis
Dyddiad/Date: 22nd December 2009
Gofynnwr Am/Ask for: Mike plant
Rhif Union/Direct Dial: 01248 750110

Dear Sir

Infrastructure Planning (Environmental Impact Assessment) Regulations 2009

**Location: Land Adjacent to Wyfia Nuclear Power Station
Proposal by Horizon Nuclear Power**

With reference to your notification dated 24th November 2009 and following an inspection of the above on 21st December 2009, I now confirm that the Fire Authority have no comment in respect of the above mentioned legislation.

If you should require any further information, please do not hesitate to contact the Inspecting Officer.

Yours faithfully

Mike Plant
Fire Safety Enforcement Officer

Hannah Pratt

From: Hatchett, Sacha (Supt) [Sacha.Hatchett@nthwales.pnn.police.uk]
Sent: 29 December 2009 00:15
To: IPC Enquiries
Cc: Hatchett, Sacha (Supt)
Subject: Land adjacent to Wylfa Nuclear Power Station
Follow Up Flag: Follow up
Flag Status: Red

Ref - EN010007/Preapp

Land Adjacent to Wylfa Power Station proposal by Horizon Nuclear Power Infrastructure Planning (Environmental Impact Assessment) Regulation 2009 SI 2263Regulation 8 and 9

With reference to the request for a scoping opinion on the above proposed project, North Wales Police would like to make the following comments:

There appears to be no reference to consultation with North Wales Police. Page 65 refers to consultation with other agencies but excludes North Wales Police.

Page 76 refers to obtaining comments from North Wales Police Authority, but doesn't include reference to the operational functions of North Wales Police.

Section 4.7 Traffic and Transport:

Section 4.73 pages 51-52 refer to an abnormal loads study and a transport management plan. I would suggest that North Wales Police are consulted during the drafting of these prior to the Environmental Impact Assessment being released for public consultation.

Section 5.2 Security pages 61-62

Again North Wales Police should be consulted earlier rather than later in the EIA process, specifically:

(i) There is currently no mention of security in relation to the impacts (both socially and environmentally) from the possibility of disruption during the construction phase of the new nuclear power station. Nuclear Power is a very emotive subject and there could be the possibility of disruption from demonstrators. It is unclear how this would be managed?

(ii) Any Security Proposals would have significant impacts on operational planning and as such early and clear consultation is required

Thankyou

Sacha Hatchett

Ni ddylid trin e-bost ar y rhyngrywyd fel dull diogel o gyfathrebu. Mae Heddlu Gogledd Cymru ond er sylw'r sawl y'i cyfeiriwyd hi ato/ati y bwriedir y neges hon. Os ydyc

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North Wales Police

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Your ref. EN010007/Preapp/COR617
Our Ref:



For the attention of Ian Collinson

Infrastructure Planning Commission
Temple Quay House
Temple Quay
BRISTOL
BS1 6PN

Chief Executive's Office

Millennium House
17 - 25 Great Victoria Street
Belfast
BT2 7BN

Direct Line 028 9025 6511
12 April 2010

By Email and Post

Dear Sirs

**INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)
REGULATIONS 2009 SI 2263
PROPOSED NUCLEAR POWER STATION AT WYLFA, ANGLESEY**

Thank you for your correspondence of 26 March 2010 regarding the scoping opinion relating to the ES for the proposed project.

I can confirm that the Northern Ireland Planning Service has no comment to make in relation to this exercise. I would point out that Planning Service is an agency within the Department of the Environment which is the Planning Authority for Northern Ireland and I am responding solely on behalf of the agency.

Please contact me at the above address or by email to simon.kirk@doeni.gov.uk if I can be of any further assistance.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Simon Kirk'.

Simon Kirk
Professional Services Manager
(Operations)

Cyswilt · Contact
Ffôn · Telephone
Ein cyf · Our ref
Eich cyf · Your ref
Dyddiad · Date
e-bost · e-mail

Mr Aled Lloyd
01766 772212
2/DC/028/ALL/RLR
EN010007/Preapp
8th December 2009
aled.lloyd@eryri-npa.gov.uk

IPC

10 DEC 2009

REF: COR059



PARC CENEDLAETHOL ERYRI
Ile i enaid gael llonydd
SNOWDONIA NATIONAL PARK
one of Britain's breathing spaces

Mr. Ian Collinson,
Case Leader on behalf of the IPC,
Temple Quay House,
Temple Quay,
Bristol. BS1 6PN

Dear Mr. Collinson,

**Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 SI 2263
Regulations 8 and 9
Proposal by Horizon Nuclear Power, Land adjacent to Wylfa Nuclear Power Station, Ynys Môn.**

I refer to your letter dated 24th November 2009 in relation to the above.

As the proposal may involve the construction of new overhead electricity lines or the deviation of existing overhead lines, then this Authority would expect to see this issue addressed in the Environmental Statement.

Yours sincerely,

Aled Lloyd

Aled Lloyd
Head of Development Control and Compliance

Our Ref: SC/15.04.10/AM549/201412
Your Ref: EN010007/PREAPP/COR617
Date: 15 April 2010
Email:



95 Kilbirnie Street
Glasgow
G5 8JD

Ian Collinson
Infrastructure Planning Commission
Temple Quay House
Temple Quay
Bristol, BS1 6PN.

Fax:

IPC

19 APR 2010

REF:

Dear Sir / Madam,

Re: Wylfa, Anglesey.

I write with reference to the above site, please note that Southern Gas Networks do not cover this area and your enquiry has been forwarded to:

Northern Gas Networks, 1 Emperor Way, Doxford International Business Park, Sunderland, SR3 3XR

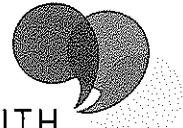
Wales West Utilities, Spooner Close, Celtic Springs, Newport, NP10 8FZ

National Grid, Plant Protection, Block1, Floor 2, Brick Kiln Street, Hinckley LE10 0NA

National Grid, Asset Protection Team, PO Box 3484, Warwick, CV34 6TG

Regards,
Alison Mair
Support Assistant
0141 418 4093

COR772



18/01/2010

IPC

19 JAN 2010

REF:

Ian Collinson
Infrastructure Planning Commission
Temple Quay House
2 The Square
Temple Quay
BRISTOL
BS1 6PN

Dear Mr Collinson

PROPOSED NUCLEAR POWER STATION AT WYLFA, ANGLESEY

It has recently come to our attention that the IPC has presented its Scoping Opinion in respect of the content of the environmental statement for the proposed nuclear power station at Wylfa, Anglesey by Horizon Nuclear Power.

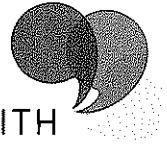
In setting out its Opinion, the IPC has taken account of the response received from organisations that were formally consulted. Although the Welsh Language Board is not included in the list of statutory consultees, the Welsh Language Act 1993 states that the Board shall have the function of promoting and facilitating the use of the Welsh language. We therefore request that we be included on all future consultations in relation to applications in Wales.

Our principal observation at this stage relate to our strong belief that a comprehensive and objective Linguistic Impact Assessment (LIA) is required, to complement the Environmental Impact Assessment. Whilst we appreciate that LIA is not a statutory requirement for planning applications, we would strongly advocate its use in relation to the proposed Wylfa development, being as it is situated in a county where 60.1% of the population are Welsh speakers (source: 2001 Census data).

Planning Policy Wales (PPW), the Welsh Assembly Government's land use planning policy states the need to ensure that the land use planning system should take into account the needs and interests of the Welsh language, and in so doing can contribute to its wellbeing. Technical Advice Note (Wales) 20, The Welsh Language – Unitary Development Plans and Planning Control acknowledges that large scale developments can introduce major change to communities and thus alter the linguistic balance, and that developments should take into account how communities can accommodate such developments without eroding the position of the Welsh language.



Col 249



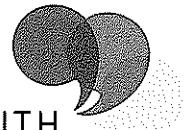
To facilitate the formulation of LIA as part of the planning process, a consortium of 16 local planning authorities, the Welsh Language Board and the Welsh Assembly Government developed a Linguistic Impact Methodology. The methodology comprises a checklist and qualitative guidance that enables the relevant planning authority to make assessments of the potential impact of a development proposal against five aspects of community life (population, quality of life, the economy, infrastructure and the social and cultural life of the community) and its impact on the Welsh language more specifically. Developers and planning authorities will need to search relevant statistics available locally and nationally to make clear assessments of the data sources for the five community aspects.

Enclosed are copies of the aforementioned Linguistic Impact Methodology. Please ensure that our response receives due consideration, and that it is forwarded to Horizon Nuclear Power. We are eager to discuss the matter further and to provide support where possible.

Yours sincerely

RHODRI ROBERTS
Government in Wales Unit





18/01/2010

Ian Collinson
Comisiwn Cynllunio Isadeiledd
Temple Quay House
2 The Square
Temple Quay
BRYSTE
BS1 6PN

Annwyl Mr Collinson

PWERDY NIWCLEAR ARFAETHEDIG YN YR WYLFA, YNYS MÔN

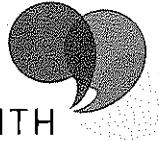
Daeth i'n sylw'n ddiweddar bod yr IPC wedi cyflwyno ei Farn Cwmpasu mewn perthynas â chynnwys y datganiad amgylcheddol ar gyfer yr orsaф niwclear arfaethedig yn yr Wylfa, Ynys Môn gan Horizon Nuclear Power.

Wrth osod ei Farn, mae'r IPC wedi rhoi ystyriaeth i'r ymatebion a dderbyniwyd oddi wrth y sefydliadau hynny yr ymgynghorwyd â nhw'n ffurfiol. Er nad yw Bwrdd yr Iaith Gymraeg yn cael ei gynnwys yn y rhestr o ymgynghoreion statudol, mae Deddf yr Iaith Gymraeg 1993 yn datgan mai swyddogaeth y Bwrdd fydd hyrwyddo a hwyluso defnyddio'r iaith Gymraeg. Gofynnwn felly eich bod yn ein cynnwys yn holl ymgynghoriadau'r dyfodol mewn perthynas â cheisiadau yng Nghymru.

Ein prif sylw ar hyn o bryd yw'n cred gref o'r angen sy'n bodoli i gynnal Asesiad Ardrawiad leithyddol (AAI) cynhwysfawr a gwrtihrychol i gyd-fynd â'r Asesiad Effaith Amgylcheddol. Er ein bod yn sylweddoli nad yw cynnal AAI yn ofyniad statudol ar gyfer ceisiadau cynllunio, argymhellwn yn gryf y'i cynhelir mewn perthynas â'r datblygiad arfaethedig hwn, wedi ei leoli fel y mae mewn sir lle mae 60.1% o'r boblogaeth yn siaradwyr Cymraeg (ffynhonnell: data Cyfrifiad 2001).

Mae Polisi Cynllunio Cymru (PCC), polisi defnydd tir Llywodraeth Cynulliad Cymru yn datgan yr angen i sicrhau y dylai'r system cynllunio defnydd tir roi ystyriaeth i anghenion a buddiannau'r iaith Gymraeg, ac wrth wneud hynny gyfrannu at ei lles. Cydnabyddir yn Nodyn Cyngor Technegol (Cymru) 20, Yr Iaith Gymraeg - Cynlluniau Datblygu Unedol a Rheoli Cynllunio y gall datblygiadau mawr gyflwyno newid sylweddol i gymunedau a chan hynny newid y cydbwysedd ieithyddol, ac y dylai datblygiadau ystyried sut y gall cymunedau ymdopi â datblygiadau o'r fath heb erydu sefyllfa'r iaith Gymraeg.





I hwyluso'r gwaith o lunio AAI fel rhan o'r broses gynllunio, datblygwyd Methodoleg Asesu Ardrawiad leithyddol gan gonsortiw o 16 o awdurdodau cynllunio lleol, Bwrdd yr iaith Gymraeg a Llywodraeth Cynulliad Cymru. Mae'n cynnwys rhestr wirio ac arweiniad ansoddol sy'n galluogi awdurdodau cynllunio lleol i wneud asesiadau o effaith bosibl y datblygiad arfaethedig yn erbyn pum agwedd ar fywyd cymunedol (y boblogaeth, ansawdd bywyd, yr economi, isadeiledd a bywyd cymdeithasol a diwylliannol y gymuned) a'i effaith ar yr iaith Gymraeg yn fwy penodol. Bydd angen i ddatblygwyr ar awdurdod cynllunio perthnasol ystyried ystadegau lleol a chenedlaethol perthnasol i wneud asesiadau clir o'r ffynonellau data ar gyfer y pum agwedd gymunedol.

Amgaeir copïau o'r Fethodoleg Asesu Ardrawiad leithyddol uchod gyda'r llythyr hwn. Gwerthfawrogor pe sicrhewch y rhoedd ystyriaeth deg i gynnwys y llythyr hwn, a gofynnwn i chi ei anfon ymlaen at Horizon Nuclear Power. Rydym yn awyddus i drafod y mater hwn â chi ymhellach ac i ddarparu cymorth lle bo hynny'n bosibl.

Yr eiddoch yn gywir

RHODRI ROBERTS
Uned Llywodraeth yng Nghymru



Planning and the Welsh Language the way ahead



December 2005

**PLANNING
AND THE
WELSH LANGUAGE :
THE WAY AHEAD**

December, 2005

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SUMMARY

1. Introduction

- 1.1 This is a summary of the work that has been done by a consortium of organisations made up of local authorities (LAs), Bwrdd yr Iaith (the Welsh Language Board (WLB)), the Home Builders Federation (HBF) and the Welsh Assembly Government (WAG). This paper represents the collective efforts of all partners with an interest in developing a better understanding of the relationship between land use planning and Welsh language in order to promote the wellbeing of the language and the cultural character of local communities. It does not represent the policy of any of the participating bodies. It will set out the:
- General background;
 - Context for the study;
 - Aims and objectives of the study;
 - Overview of the work done by the consultants;
 - Conclusions;
 - Recommendations.
- 1.2 This paper should be read alongside the main discussion note (Pages 9-14) and appendices.

2. General Background

- 2.1 In Wales the Welsh language is spoken by 582,400 people (2001 Census) representing almost 21 % of the total population. In the more rural communities in North West Wales – counties of Gwynedd and Anglesey and in West Wales – counties of Ceredigion and Carmarthen, the language is spoken by the majority of the population. The Welsh language is also in everyday use in a number of other communities within other counties in Wales.
- 2.2 Since the early 19th century the number and percentage of Welsh speakers in Wales has been in decline. Whereas nearly fifty per cent of the Welsh population were able to speak Welsh in 1901, this percentage had decreased to less than nineteen per cent in 1991 although it increased slightly to nearly 21% in 2001.

- 2.3 This decline in the number and percentages of Welsh speakers throughout the twentieth century has led to a fragmentation of the 'core' areas. In 1961 279 communities in Wales (out of a total of 993) recorded that at least 80% of their community could speak Welsh. By 2001, that percentage was exceeded in only 20 electoral divisions although a further 37 had more than 70% able to speak Welsh. In these core areas however the Welsh language is a vibrant and living language spoken in social, leisure and business activities and not confined to the home, chapel and school. In these areas, Welsh is a living, everyday language, spoken, heard and seen in the community; it is part of the fabric of the community.
- 2.4 WAG in 'Dyfodol Dwyieithog/A Bilingual Future' (2002) acknowledge that the reduction in the number of primarily Welsh-speaking communities is one of the most serious threats to the future of the Welsh language. In order to address this threat WAG advocate the creation of economically and socially sustainable communities and the encouragement of planning and housing policies and decisions which take account of the linguistic character of communities.
- 2.5 WAG in *Iaith Pawb: A National Action Plan for a Bilingual Wales* (2003) adopted the following targets to be achieved by 2011:
- The percentage of people in Wales able to speak Welsh has increased by five percentage points from the figure which emerges from the census of 2001 (21%)
 - The decline in the number of communities where Welsh is spoken by over 70% of the population is arrested
 - The percentage of children receiving Welsh medium pre-school education has increased
 - The percentage of families where Welsh is the principal language of conversation/communication between adults and children has increased
 - More services, by public, private and voluntary organisations should be delivered through the medium of Welsh.
- 2.6 Since 1988 (Circular 53/88) the Welsh Language has been a material planning consideration to be taken into account in formulating land use policies and in the determination of planning applications
- 2.7 WAG planning policy is contained in Planning Policy Wales (2002) and technical advice in Technical Advice Note (Wales) 20. PPW requires all local planning authorities to consider whether they have communities where the use of the Welsh language is part of the social fabric. Where the Welsh language is part of the social fabric it is appropriate that the language be

taken into account in the formulation of land use planning policies, including the capacity of different areas and communities to accommodate development without detriment to the position of the Welsh language. TAN 20 sets out how local planning authorities, when producing plans or making planning decisions, should take account of the needs and interests of the Welsh language and in so doing to contribute to its well being.

3. Context for the Study

- 3.1 Local Planning Authorities have had difficulty in applying the policy and guidance in PPW and TAN20 in the context of development plan policy and development control.
- 3.2 Denbighshire County Council's adopted (July 2002) Unitary Development Plan (UDP) takes a precautionary approach, requiring the developer, where significant harm is likely, to include adequate information and explanation of the likely effects of the proposal on the Welsh language and cultural character of the area. Policy GEN 7 states that the Council will prepare Supplementary Planning Guidance (SPG) providing guidance on measuring significant harm
- 3.3 In discussions with WLB during the preparation and adoption of the Denbighshire UDP it was recognised that the preparation of the SPG would be time intensive requiring detailed assessment and research. It was also considered that more detailed technical advice on how the effects of a development on language could be measured and assessed with a degree of confidence was required. Denbighshire County Council in 2002 invited all Welsh local planning authorities, the Welsh Language Board and the Welsh Assembly Government to make a financial contribution and to work together to undertake this research.
- 3.4 In response 16 local planning authorities, the Welsh Language Board and the Welsh Assembly Government offered their support and a total of £86,000 was raised to undertake the research. (Appendix H).
- 3.5 In 2003 a Steering Group, made up of representatives of the local planning authorities, WAG officials, HBF and WLB was established and a study brief agreed in consultation with funding partners. A notice inviting expressions of interest in undertaking the Linguistic Impact Study was advertised in the local and national press. The response from specialists (consultants and / or universities) was disappointing. Finally, only two tenders were regarded as being suitable for short listing. Following interview by the Steering Group, the study contract was awarded to the Bartlett School of Planning, University College London (UCL) led by Dr Mark Tewdwr-Jones.

4. Aims and Objectives of the Study

- 4.1 The aim of the research was as to produce a linguistic impact methodology which would enable LPAs to produce meaningful and practical policies to protect and promote the use of the Welsh language and to enable them to assess the implications of development plan policies and planning applications on the well being of the language and cultural character of communities.
- 4.2 The expected outputs of the research were set out in the Brief as follows:
- a) To produce a *practical* tool kit to help LPAs make judgements as to whether the use of the language forms part of the *social fabric* of the authority area as referred to in TAN 20. The tool kit should enable LPAs to update any findings as and when is necessary e.g. UDP Review.
 - b) To produce a *practical* tool kit to help LPAs measure the *interaction* between land use planning policies/proposals relating to the Welsh language and other land use planning policies e.g. scale, location, type, phasing of development etc. This tool kit should provide LPAs with *measurable* information on the impact that land use planning policies, proposals and decisions have on the Welsh language. It should enable LPAs to prepare a development strategy for a UDP that takes full account of the needs and interest of the Welsh language. This tool kit should also include the ability to measure the impact of completed developments upon the Welsh language i.e. monitoring of policies/decisions.
 - c) To produce a *Welsh Language Impact Assessment (WLIA) Methodology* including how to “*prove demonstrable harm*” in the determination of *planning applications* and appraising the impact of proposals in *development plan* preparation. The WLIA study should be robust enough to be sustainable at planning appeal.
 - d) To provide practical case examples of negative and positive impacts of development, utilising different examples of location, type, scale and phasing of development. This should include as broad a range of developments as possible e.g. small housing developments in small settlements, larger developments in larger settlements, lack of affordable housing provision, lack of provision of housing for local need, retail, employment, transport and leisure developments etc. These case examples should be backed up by quantifiable evidence. Case examples from other countries with minority languages may be used where they will contribute towards the objectives of the Study.
 - e) To create a database containing a reference to sources of information available on the Welsh language relevant to land use planning issues, including areas where there may be gaps in information. This should

include information on whether the information is published/unpublished; how to collect the information; and how to keep it up to date.

- f) To create practical ‘model’ UDP policies and their justification for local interpretation.
- g) To create a practical ‘model’ SPG on the impact upon the Welsh language, paying particular attention to the type of information that LPAs would require from developers, including any necessary mitigation measures.
- h) To create practical ‘model’ planning conditions / agreements to exercise future control over developments.

5. UCL Study Findings

5.1 The consultants produced:

- Volume 1: Critical Appraisal and Methodological Background
- Volume 2: Linguistic Impact Assessment

5.2 The research proved to be very difficult as it was investigating something where no models existed and primary research resources were limited.

5.3 UCL recommended a two part Welsh Language Impact Assessment process as an aid to strategic policy formulation and to establish the likely impacts of new development:

- a) Linguistic Profiling Tool Kit and
- b) Linguistic Impact Assessment Methodology.

5.4 The main findings/conclusions of the UCL study are as follows:

- there are no practical examples of Linguistic Impact Assessment (LIA) to be found in other countries
- local planning authorities should use a Linguistic Profiling Tool Kit in developing policies to assess whether the Welsh language forms part of the social fabric of communities in their area. The profiling kit includes several indices related to usage and support for the language, migration and trends in the number and proportion of Welsh speakers in a community. The profiling kit was intended for use in communities exceeding a certain percentage of Welsh Speakers, 30% being the proposed threshold.

- a Linguistic Impact Assessment Methodology (LIAM) should be used to allow local planning authorities to make an assessment of the likely impact of a development proposal against five components of community life. The five components of community life are: population; quality of life; the economy; infrastructure i.e. services; social and cultural life of the community. The LIAM includes an Overall Impact Assessment Index based on replies to questions within each of the five components of community life. The index produces a score of language impact.
- measuring impacts is very difficult because there are social as well as physical impacts and they vary in their scale, duration, intensity and their tendency to bring about cumulative social change.
- further work is required to test the methodology – including applying real life case studies; community profiling; and producing model policies, conditions and obligations.

6. Additional Research

- 6.1 Following consideration of the UCL findings the Steering Group considered that their work should be developed in consultation with users. A Planning Sub-Group was set up to develop the practical aspects of the UCL research and consider what further guidance could be produced based on the UCL work. The Sub-Group was led by Gwynedd Council's Planning Services and assisted by an independent advisor.
- Their key suggestions are produced in the form of a discussion note, (See paras. 9–14). In summary their suggestions are as follows:
 - LPAs should have regard to their community strategies and engage with their communities through the LDP Community Involvement Schemes in the preparation of linguistic land use policies
 - As a means of initial profiling, LPAs should start to define Language Sensitive Areas within their areas based on a threshold of whether 25% or more of their Community Council area speak Welsh. However, it will be a matter for the LPA to determine the extent of the defined Language Sensitive Areas (LSA) through the development plan process and could include individual settlements outside the area defined by the suggested threshold;
The proposed threshold of 25%, as opposed to the 30% threshold recommended by UCL (para 5.4), would ensure a contiguous LSA area in Wales. See Map 1.

- Once LSA's have been defined, it is suggested that local authorities identify when developers would be required to provide a Language Statement to accompany a proposal in an LSA.
- A set of criteria that developers should provide as a minimum to meet the requirements of Language Statement is suggested;
- It is suggested that in most cases a Language Statement would be sufficient for the LPA to judge impact. Exceptionally, following LPA evaluation of the Statement and an assessment that impact is substantially detrimental, the LPA could require a Language Impact Assessment (LIA). The LIA could be modelled on the Linguistic Impact Assessment Methodology produced by UCL.

7. Suggestions by the Steering Group to LPAs

- Consider the research information and Steering Group suggestions in this report and discussion note when developing policies and proposals which protect and promote the wellbeing of the Welsh language and culture;
- Those LPAs (especially those with areas that could qualify as LSAs as defined in the discussion note) should continue to work together with the WLB and share new information about policy development and appeal decisions as well as good practice
- In progressing the UDP and preparation of the LDP ensure proper engagement with the Community Strategy process and ensure that the LDP Community Involvement Scheme is structured to engage communities in debate about the well being of the Welsh language;
- Ensure that the impact of policies in development plans on the wellbeing of the Welsh language and culture are reviewed and monitored to ensure that those in UDPs not yet adopted and those drafted for LDPs are more effective.
- To note that the Language Impact Assessment (Appendix C) has not been thoroughly tested.

8. Recommendations by the Steering Group to WAG:

- To evaluate the ideas and suggestions in this report/discussion note and consider their implications for Welsh planning policy in Planning Policy Wales and TAN 20 and any other related legislation or guidance.
-

PLANNING AND THE WELSH LANGUAGE : THE WAY AHEAD

- To consider the need for any further research to support new policy, including a review in conjunction with the WLB of the usefulness of national data sources on the wellbeing of the Welsh language and culture for planning purposes
- To do the above in consultation with key stakeholders.
- To continue to engage with LPAs that are developing local policy in relation to planning and the Welsh language

WELSH LANGUAGE DISCUSSION NOTE

1. Purpose

- 1.1 The aim of this discussion note is to:
 - give informal guidance to LPA's on how they should take into account the Welsh Language whilst preparing and reviewing their development plans and in the determination of planning applications;
 - form a basis for reviewing WAG Technical Advice Note and Planning Policy Wales;
 - recommend that the issues raised in the paper are used to encourage wider debate, discussion and consultation.
- 1.2 This discussion note does not represent the views or policy of the partner organisations.
- 1.3 The discussion note suggests how LPAs could interpret existing national policy and advice and incorporate them into their development plans. It suggests how to measure whether the Welsh language forms part of the fabric of the community. It suggests how the Welsh language should be incorporated into the development plan preparation and review and how to attach weight to the Welsh language as a material planning consideration in the determination of planning and advertisement applications. The discussion note suggest how LPAs can consider the linguistic impact of a development within communities and whether a more rigorous Language Impact Assessment is required. For any given land use allocation or development it will be a matter for the LPA to balance the various socio-economic implications, only one of which will be the Welsh Language, and within the context of the relevant planning policies and other material planning considerations.

2. The Welsh Language and the Social Fabric of Communities

- 2.1 The Welsh Language is part of the social fabric and culture of Wales and is spoken by 20.8% of the population. There are also a substantial number of people who have some knowledge of the language. It is extensively taught at schools throughout Wales, and not just in those schools where Welsh is the main teaching medium.

- 2.2 The Welsh Language is inextricably linked to the Welsh cultural fabric of a community. It is axiomatic that the use of the Welsh language in the community is a robust indicator of the health and vitality of the Welsh language and culture.
- 2.3 In certain communities the proportion of Welsh speakers is as high as 88%, whilst in others it is as low as 6%. Around 89% of those who can speak Welsh were born in Wales. Many of those who have moved to Wales have respected and supported the language. Some have also learnt the language and in so doing have contributed to the continued success of the language in their respective communities.
- 2.4 In some areas both the number of Welsh speakers and use of the language has declined but in others it has increased. The future well-being of the language will depend on a variety of factors, such as education, its use in the business environment, demographic change and community activities as well as a sound economic basis for each community. Nevertheless, the land-use planning system can and should take account of the needs and interests of the Welsh Language and, in doing so, contribute to its well-being.

3. Communities where the Welsh Language is part of the Social Fabric

- 3.1 Planning Policy Wales states that all local planning authorities should consider whether they have communities where the use of the Welsh language is part of the social fabric and, where this is so, it is appropriate that this be taken into account in the formulation of land use policies.
- 3.2 The difficulty in the past has been in deciding how much emphasis to put on language issues within the land use planning framework and whether a greater emphasis should be placed in communities with the highest percentage of Welsh speakers. It is fair to say that within communities where the majority speak Welsh, the more it is part of everyday life and an integral part of the social fabric. There are ongoing language initiatives e.g. Menter Iaith and projects which play an important role in encouraging and promoting the Welsh language within communities in Wales.
- 3.3 The guidance in TAN 20 as far as materiality of the Welsh language is concerned requires amending if decisions are to be based safely on language impact. The question is when and where should a language impact assessment apply, for what development and how should it be prepared and analysed. This discussion note seeks to address some of these issues.

4 Consideration within Development Plans

- 4.1 In preparing Development Plans local planning authorities should have regard to the national policy including Iaith Pawb and the Wales Spatial Plan. Local Planning Authorities in their Community Strategies should consider the relationship between planning policies and social needs including their likely impact on different groups in the population. The preparation of the Local Development Plan (LDP) Community Involvement Scheme provides local planning authorities with the opportunity to engage communities in the debate about the Welsh language and culture. The Sustainability Appraisal processes for LDPs will make the trade offs between language impact and other social, economic and environmental considerations transparent.
- 4.2 All LPA's should consider whether they have communities where the use of the Welsh language is part of the social fabric. To assist in this analysis it is proposed that LPA should define Language Sensitive Areas within their areas based on whether 25% or more of their Community Council areas speak Welsh based on the 2001 Census. It is proposed that the threshold should be set at this level for the following reasons:-
 - The national average of Welsh speakers is 20.8%. The threshold should closely reflect the national average to ensure the majority of communities with a slightly higher percentage to the average are included.
 - In Iaith Pawb (Language for All) and Planning Policy Wales it states that every local planning authority should consider whether they have communities where the use of Welsh is part of the social fabric. It is reasonable to consider those communities which have a higher percentage of Welsh speakers than the national average.
 - The 25% and over threshold, as opposed to the 30% threshold recommended by UCL, forms a contiguous area within Wales. (See Map 1).
- 4.3 It will be a matter for the LPA to determine the extent of the Language Sensitive Area (LSA). These should be based on Community Council-Boundaries. LSA should relate to the strategy of their LDPs. LPAs will need to clearly define the rationale behind determining LSA Boundaries taking into account national strategies such as Iaith Pawb, the Wales Spatial Plan and local circumstances. Normally the threshold of 25% will be sufficient. However, there may be local circumstances where an LPA may wish to identify an area below the 25% threshold. This could be justified, for example, where local language revival initiatives exist which have the support of local communities and partners, or where there is a particular village or community within a larger community council area which requires special protection or

encouragement. Where this is the case the LPA should clearly state their justification for including community council areas below the threshold.

- 4.4 LPAs should describe the linguistic character of each LSA and the special qualities and problems of the area which require protection and enhancement.
- 4.5 In the main, it is policies and allocations relating to housing and employment that are most likely to have significant socio-economic impacts. The land use impacts of housing and employment proposals should be assessed in LSAs and their short and long term impacts on the Welsh language and the cultural character of the LSA. Large scale housing developments of a type and scale unrelated to the size and needs of the community are known to have harmful impacts on the language and cultural character of LSAs. The influx of a proportionally large number of non Welsh speaking residents to a LSA is likely to undermine predominantly smaller Welsh speaking communities making assimilation difficult. On the other hand, in smaller rural communities, some additional employment and housing of the right type and scale to meet local needs may be required to sustain existing communities. The likely growth should be proportional to the socio-economic needs of the LSA and its likely capacity for change over time without harming the language. In doing this Appendix B and C will assist LPA in considering all the pertinent factors relevant to a full appraisal.
- 4.6 LPAs should aim to provide for the broad distribution of housing required to meet their local housing targets. The targets should be set having regard to the potential overall impact on the Welsh Language. For example if an area is vulnerable to an increase in non Welsh speakers the overall scale of housing provision should be reviewed by the LPA and set at a level which accommodates the overall needs of individual communities. In some areas the LPA may wish to encourage new affordable housing in order to offer different housing types to stem out-migration.
- 4.7 Supporting sustainable communities requires a healthy economic base. LDPs should identify small scale opportunities for employment provision as part of its wider local economic strategy.
- 4.8 What is difficult is identifying the scale of development that meets local expectations and market considerations. In reaching a conclusion the long term sustainability of the development should be considered, not only in environmental and social terms but also linguistically. Determining the size and boundaries of LSA will be critical as the capacity of some areas to accommodate change will be greater than others.
- 4.9 By following this advice it should be possible for a LPA to clearly demonstrate in their Development Plans statements to indicate how they have taken the needs and interests of the Welsh language into account during plan preparation. The eventual aim is to create sustainable communities that support a range of

functions and services, appropriate to their scale. The services will be accessible to and affordable by those who make up the community.

5. Development Control

- 5.1 Normally the linguistic impact of land use allocations and designations will have been assessed in the development plan. However, within defined LSAs, authorities may need to assess a development which has not been addressed during plan preparation. This principle has been accepted by the Planning Inspectorate in its report on the Denbighshire Unitary Plan (2001). Policy GEN 7 in the adopted Denbighshire UDP requires the developer, where significant harm is likely, to include adequate information and explanation of the likely effects of the proposal on the Welsh language and cultural character of the area.
- 5.2 Where LPAs have an adopted policy on the Welsh language this may provide the policy basis to enable them to defining Language Sensitive Areas. Once the LSA's have been defined and published by the LPA it is proposed that the developer with a proposal within an LSA should be requested to provide a Language Statement to accompany the application if it falls within any one of the criteria set out in 'Appendix A'.
- 5.3 In all cases it will be a matter for the LPA to decide whether a statement is required depending on the nature and scale of development and its impact on the special linguistic character of the LSA. Once this has been established the developer will be required as a minimum to provide the statement based on the requirements of "Appendix B" and to submit the information as part of the application. Most of the information is publicly available however.
- 5.4 In the vast majority of cases a Language Statement should be sufficient. Exceptionally the LPA may consider, once a statement has been evaluated, that the development is likely to cause significant harm or it may be that the statement is not conclusive. In such cases a Language Impact Assessment (LIA) should be sought. If an LIA is sought the LPA should clearly state their reasons and what issues need to be included in a Language Impact Assessment. Appendix C provides guidelines which should be interpreted flexibly. The process of moving from a Language Statement to a Language Impact LIA can be likened to the screening and scoping process of preparing an Environmental Statement. It is likely that with larger proposals, an Environmental Statement will have been prepared. With the assistance of the LPA it should be possible to scope, based on 'Appendix C', areas where further information is required. Following the completion of a LIA if the LPA are minded to refuse planning permission on Language Impact alone, they should be clear on the long term consequences which cannot be mitigated against. Where it is possible to mitigate to lessen the Language Impact Section 106 Agreements, unilateral undertakings and planning conditions relevant to the development should be considered.

- 5.5 A list of possible mitigation measures is included in Appendix G. These are just some of the possible mitigation measures which could be used where there is evidence that the development would have an adverse effect on the Welsh Language. A number of the mitigation measures that could be sought will be governed by National Guidance on Planning Obligations, others may be more appropriate as conditions or unilateral undertakings.
- 5.6 At present any mitigation measures which require the use of a planning obligation will be guided by advice that their use should be necessary, relevant to planning, directly related to the proposed development, fairly and reasonably related in scale and kind to the proposed development and reasonable in all other respects. What is sought should have a direct relationship with the planning permission.
- 5.7 Any facilities or contributions sought will only be acceptable where such facilities are directly related to the development proposal, the need for them arises from its implementation and they are related in scale and kind. It will be important to ensure that what is being asked for is reasonable. Any requirement that involves a planning obligation will have to be negotiated with the developer and not required.

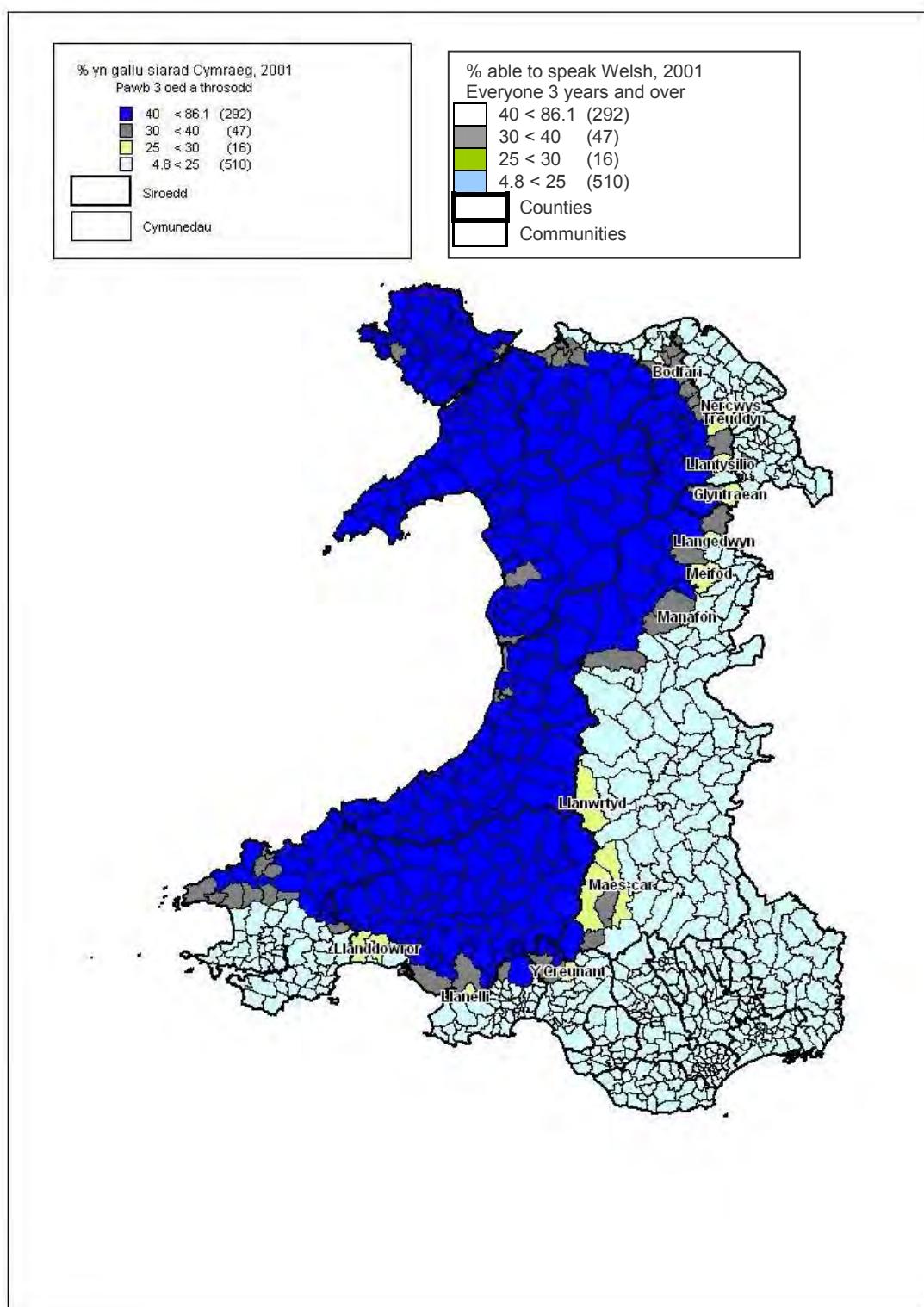
6. Signs and Advertisements

- 6.1 It is possible to promote the use of the Welsh Language thorough the planning process especially through express consents for signs and advertisements. Culture and language are components of amenity and advertisements contribute in a visual way to the physical and social character of an area. Through the planning process bilingual signs should be promoted and mono-lingual signs refused if they adversely affect the physical environment and have implications for the wider social character and amenity of an area. The promotion of bilingual signs can also be encouraged where advertisement consent is not required in order to change and safeguard linguistic character. Appropriate policies in the development plan will assist in this process, as will any local initiatives to support local business to provide bilingual signs (the above may involve the need to amend the current Advertisement Regulations 1992).
- 6.2 Within LSA LPAs should be allowed to adopt policies which positively encourage the display of bilingual signs. Advertisement regulations should be amended or the law clarified to enable 'amenity' to include the visual cultural characteristics of the area.

APPENDICES

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DISTRIBUTION OF WELSH SPEAKERS



LANGUAGE STATEMENT : SCREENING

CRITERIA TO CONSIDER IN DECIDING WHETHER A LANGUAGE STATEMENT IS REQUIRED WITH AN APPLICATION WITHIN AN LSA

1. Does the proposal comply with all policies in the adopted development plan (where an adopted plan has been adopted or reviewed in the past 5 years)?

If Yes, then a LS is not required.

2. Is the development likely to change the special linguistic character of the LSA by virtue of:

- a) its scale in relation to local needs;
- b) type of development
- c) speed of development

Such examples may include:-

- Scale and type of housing provision is likely to attract non Welsh speakers
- Employment development is likely to result in the in-migration of workers over the short and long term.
- Infrastructure development is likely to change travel patterns and increase accessibility to more vulnerable communities.

If the answer is Yes or the answer is not known then the LPA should adopt a precautionary approach and request a Language Statement from the developer

3. Is the development likely to result in out-migration of Welsh speakers?

If the answer is Yes, then a LS is required.

LANGUAGE STATEMENT :

EXAMPLES OF INFORMATION WHICH COULD BE REQUIRED IN A LANGUAGE STATEMENT

1. Employment (including retail)

- 1.1 Does the employment meet primarily local needs?
- 1.2 Does the proposal comply with local and national strategies?
- 1.3 How many jobs will be created and how many will be sourced locally?
- 1.4 Are the required labour skills available locally (within TTW area)?
- 1.5 For tourism developments, which is the expected catchment area ?
- 1.6 Are there other similar developments with planning permission in the area?.
- 1.7 Is the proposal likely to result in further investment of a similar kind?
- 1.8 What training is required to re-skill the local workforce and will this include Welsh Language Training by the developer?
- 1.9 How will new wage levels compare with the average wage levels in the area?.
- 1.10 Will the proposal compete or complement existing tourism attractions?

2. Housing

- 2.1 What is the expected market price for the houses and how does this compare with local household income?
- 2.2 Have there have been similar developments in scale completed in the past 5 years? If yes, have they met primarily local needs?
- 2.3 Does the development include for an appropriate element of affordable housing to meet local need?
- 2.4 How will the development be phased?
- 2.5 Does the proposal comply with the type and demand for housing forecasted in the development plan?

- 2.6 What has been the rate of residential growth in the community in the past 5 years?
- 2.7 What has been the percentage occupancy by local people of new dwellings completed in the past 5 years?

3. Education

- 3.1 Is the proposal likely to result in the need for additional school places?

If yes, is there sufficient capacity within local schools, and how is the proposal likely to affect the language patterns in local schools?

4. Infrastructure

- 4.1 Would the development significantly improve accessibility into the LSA and reduce travel times from larger surrounding conurbations?

5. General

- 5.1 Are there appropriate local services such as shops, residential/community facilities to serve the development?
- 5.2 Will the proposal create new opportunities to promote the language and local initiatives in the community?
- 5.3 How will the development promote the use of the language in the community?
- 5.4 What are the proposed mitigation measures?

Proposals which:

- a) provide for significantly more than local needs, on their own or cumulatively;
- b) are relatively large in comparison with local market demand;
- c) will attract a relatively significant influx of non Welsh speakers;
- d) provide for continuation of past trends which are known to detrimentally affect the well being of the language;

are likely to require a Language Impact Assessment.

LANGUAGE IMPACT ASSESSMENT

ASSESSING THE LIKELY IMPACTS OF A DEVELOPMENT ON COMMUNITY AND LANGUAGE

1. INTRODUCTION

- 1.1 Where the LPA considers that the Language Statement provides insufficient information to properly assess language impact or where significant harm is likely, the following more detailed methodology should be used in preparing a full Linguistic Impact Assessment within the defined Language Sensitive Area (LSI).

2. PURPOSE

- 2.1 The purpose of the **Linguistic Impact Assessment Methodology** is to enable local planning authorities to make assessments of the potential impacts of a development on a local community in general and on the Welsh language in particular. A linguistic impact assessment is essentially a process of assessing the probably future impacts of its various components and policies, and of the cumulative effects of the whole and elements of an application or policy, on a range of community attributes.
- 2.2 Having provided a Language Statement and demonstrated the importance of the Welsh language to communities, local planning authorities may require developers on individual planning applications to prepare Linguistic Impact Assessment. The assessment places the Welsh language within the context of the characteristics of places and the desire to create sustainable communities. They themselves can also use the methodology to develop policies and trust the implications of new land use allocations.
- 2.3 The Linguistic Impact Assessment Methodology comprises a checklist to allow the developer local planning authorities to make an assessment of the likely impact of a development proposal against five aspects of community life:
- a) Population (levels and the characteristics of that population)
 - b) Quality of life (therefore providing the impetus for people to remain, leave or move to the community)
 - c) The economy (affecting employment opportunities for different groups as well as the cost of living and, more specifically, the cost of housing)

- d) Infrastructure (needed to sustain the community, particularly schools, health care and essential services)
 - e) The social and cultural life of the community (expressed through the viability of cultural institutions, particularly those affecting younger people).
- 2.4 Population stability or moderate growth, combined with a high quality of life, a strong economy, high quality infrastructure and a vibrant social and cultural life are all central to community cohesion and sustainability. Where the Welsh language forms a part of the social fabric of a community, its fate and well-being is inexorably tied to the wider fortunes of that community. If a development is likely to be detrimental to any one of these aspects, it may also have an adverse impact on the Welsh language. However, if it is sensitive to the local context e.g. supporting the local economy, then the impact is far more likely to be positive.
- 2.5 The checklist provides guidance on assessing the likely impact of a development against the five aspects of community, with a view to establishing both its effects on the community in general and its impact on the Welsh language more specifically. It is a guide for those responsible for establishing likely impacts, designing policy and advising on development decisions.
- 2.6 Developers and Local planning authorities will need to search relevant statistics available locally and nationally to make a clear assessment of the data sources for the five community aspects. A list of the most pertinent data sources, and their access websites is included in Appendix D. Most of the data is readily accessible and free, and some types of data may be accessed for particular named communities via online search engines.

3. METHODOLOGY AND ASSESSMENT

- 3.1 The Linguistic Impact Assessment Methodology has been devised taking into account the form of impact assessment methodologies already applied to different aspects of planning and development. These methodologies normally comprise either a tick/cross scoring in answer to each question, or a numeric scoring.

Scoring the Checklist

- 3.2 The Linguistic Impact Assessment Methodology is a subjective process intended to establish the probable impacts stemming from a development proposal or policy. When officers use the checklist, each question should be answered with a positive, negative or neutral score reflecting the perceived impact of the development against the five sets of issues. Numerals need to be

inserted as the answer to each checklist question, with numeral +1 representing a perceived positive impact, numeral -1 a perceived negative impact, and numeral 0 for a perceived neutral impact.

- 3.3 Gradually, scores of +1, -1 and 0 will be inserted as the answers to each checklist question across the five sets of community life topics. The ability to compare options is important in undertaking an assessment, guiding the assessor to the 'best' overall choice. The impact assessment helps to inform decisions about which checklist topics perform better than others against the five community life issues by revealing the potential impacts. The ultimate choices have to be made by the assessor. An inability to answer any of the questions suggests that assessors will need to construct new data and evidence to search for an answer. In the assessment process, a lack of answer to a question (i.e. a blank return) will be deleted from the overall calculation. The final Overall Impact Index Assessment matrix (see below) will indicate which options have more harmful impacts or, conversely, beneficial contributions.
- 3.4 It is not suggested that the addition and comparison of these impacts will make the overall choice for the developer/local planning authority. However, a matrix that identifies those impacts that have a relatively high positive or negative impact, and is accompanied by a commentary, will help decision-makers to determine the most sustainable option. The importance or weight to be given to a checklist question will vary for different policies and development proposals, and that judgment is for those making the assessment. The developer and local planning authority will need to make a judgment on how much weight to give those checklist answers that are concerned with the shorter or longer term, for example.
- 3.5 There will be many cases when this categorization is not possible and these should be recorded as a 'don't know' or query. In addition there will be cases where the policy cannot be categorized because the way it is worded means that its likely outputs cannot be determined. This too should be treated as a query (see box below). Such policies should be reformulated so that they can be measured through a suitable target or indicator.
- 3.6 Much of the appraisal flowing out of the proposed methodology is at least partially qualitative and relies on the judgment of the appraisers. For this reason the approach promoted is one which makes use of text entries to the appraisal framework rather than relying solely on a system of symbols. Often the issues raised by the text will result from 'thought association' rather than directly from the appraisal framework. Such associations are frequently very valuable, making inter-connections between different areas of impact, which a symbols only appraisal would not bring out.

Calculating an Overall Impact Index

- 3.7 The final part of the assessment methodology is an Overall Impact Assessment Index. This comprises a measurable summary table that permits the assessor to develop a positive, negative or neutral score relating to the perceived impacts likely to occur. The score will then form a material consideration in the assessment of an application for planning permission within development control, or an indicator in the assessment of whether or not to adopt a policy or proposal.
- 3.8 Each of the questions within each of the five sets of community life components - population characteristics, quality of life, economic factors, infrastructure supply, social and cultural aspects - produces a range of scores known as the *base index*. These 18 scores may then be used to calculate an Overall Base Index Score, which is simply the average score across all the answers. An Overall Base Score of between 0.1 and 1.0 denotes a positive impact; a score of 0 denotes a neutral impact; a score between -1.0 and -0.1 denotes a negative impact, with actual figures representing the relative perceived severity.
- 3.9 The summary table automatically calculates a *dimensional index*, which is a mean score for each of the community life components - a mean for population; a mean for quality of life; a mean for economic factors; a mean for infrastructure; and a mean for social issues. This enables assessors to compare the mean score for each of the five components, recognizing the perceived greater impacts, and possible trade-offs, between one component over another.
- 3.10 Depending on the policy priorities of the local planning authority, the objectives of the development plan, and the socio-economic profile of the community where the development is proposed, the assessor may give greater weight to one or more of the five components at this stage of the assessment when the Overall Impact Index is utilized as a decision tool. The choice of which component to attach greater weight to is a matter for the local planning authority, justified on local circumstances and policy priorities. Alternatively, the assessor may regard each of the five components as being of equal significance and therefore of equal weight.
- 3.11 The Overall Base Index Score may then be used to calculate *Language Impact Scores*. These scores are divided into three variations - to represent the degree of importance of the language in that particular location: if the language is considered to have 'high' importance; if the language is considered to have 'middle' importance; and if the language is considered to have 'low' importance. These figures are calculated automatically.

The use of 'high', 'middle' and 'low' significance for language importance is a matter for the local planning authority, and is determined about where the development is intended to be located and the results of the Linguistic Profiling exercise.

4. USING THE LANGUAGE IMPACT SCORES IN PLANNING

- 4.1 When the methodology is applied to an application for planning permission in development control, the results of the assessment will be a material consideration in the determination of that application. When the methodology is applied to a policy or proposal intended to be included within a development plan or strategy, the results of the assessment will provide an indication of whether the local planning authority should decide to proceed with the, policy or not.
- 4.2 The Language Impact Score (and overall impact assessment) is partly a matter of judgment; the score provides a considered opinion on the part of the local developer/planning authority specifically to language and community well-being, and the developer/local planning authority would be expected to justify and give reasons for their utility of the assessment methodology in individual cases.
- 4.3 On occasions, it will be necessary to make decisions that protect the language against other social and economic interests. Where the local planning authority determines that the likely impact of a development proposal or policy is detrimental to the well-being of the community and pose as a possible threat to the language, the local planning authority should demonstrate through the assessment methodology's results why the Welsh language, as an interest of acknowledged importance, would be demonstrably harmed if the development proceeded.
- 4.4 The sophistication of the linguistic impact assessment methodology will ensure that a firm base based on evidence is provided to decision-makers when utilized in planning policy formulation and in development control. Initially, the Welsh Linguistic Impact Assessment will need to be recognized in national planning policy by the Welsh Assembly Government in order to provide security to local planning authorities and to enable the use of the methodology in practice.

Overview

- 4.5 Local authorities should use this note as a guide for their own assessments, in terms of the data used and the linkages identified between developments and their impacts. However, the assessment methodology will be considerably strengthened through the monitoring of local developments and gauging their impacts across the five aspects of community life. This will allow authorities to make more confident predictions of likely community and language impact.
- 4.6 The checklist set out here should be seen as a starting point and a guide for future impact assessment. It needs to be used in conjunction with a wide range of local and national data and local knowledge. The assessment

methodology should lead to more informed judgments over the community impacts of development, and therefore more appropriate policy and decision-making. However, it cannot provide a definitive or quantitative statement on the effects of development.

- 4.7 The choice of checklist questions and community life issues by which the linguistic impact assessment process is to be analyzed should be determined by, and linked to objectives that are specifically related to intent, rather than to description. The number of checklist and community topics should be limited for practical and financial reasons, avoiding the potential of information overload. They should be kept to a minimum, and an essential criterion is that data should be available to assist in making a reasoned judgment of each at a reasonable cost. It is essential that progress with implementing the linguistic impact assessment is monitored and its effectiveness reviewed in terms of the objectives for the Welsh language and sustainable communities.
- 4.8 A pre-requisite of linguistic impact assessment is clear: the checklist questions must be sufficiently specific in their intentions to enable them to be assessed. Providing that the scope and nature of linguistic impact assessment is consistent with the advice set out in Planning Policy Wales and relevant Technical Advice Notes, it should be capable of being implemented and utilized in policy formulation, policy appraisal and development control. Where the linguistic impact assessment methodology is unable to provide a clear indication of the potential impacts of a particular policy or proposal, this will be an indication that the policy or proposal is unclear and insufficiently specific and consequently will indicate a need to be revised.

Checklist Questions on Community and Language Impacts

Please complete the following questionnaire, providing as much detail as possible. After the main question, there is an opportunity to add further comments on key issues. Part (a) after each question is an opportunity to make an overall assessment; Part (b) is a statement of evidence, normally based on prior experience; Part (c) is your evidence based assessment of general community impact, and part (d) deals with possible mitigation measures. The numerical assessment provided in Part (c) of each question will need to be fed into the overall impact tool at the end of the questionnaire.

POPULATION CHARACTERISTICS

1. Is the policy / plan / programme / project likely to lead to a population increase / decrease that might:

Affect the balance of English / Welsh speaker (in a negative / positive way); or

Lead to an absolute or proportional decline in the number of Welsh speakers

a) Please DESCRIBE your overall assessment

b) Please STATE previous evidence (local / national case studies drawing on the UK Census for 1991 and 2001)

c) Please STATE whether you consider that the development will have a POSITIVE (1), NEUTRAL (0), or NEGATIVE (-1) impact on the COMMUNITY as a whole

d) How might any NEGATIVE impact be mitigated, or any POSITIVE impact enhanced?

2. Is the policy / plan / programme / project likely to lead to increased in-migration?

Might this result in a permanent increase in the proportion of non-Welsh speaking households?

Will the change be permanent or temporary?

a) Please DESCRIBE your overall assessment

b) Please STATE previous evidence (local / national case studies drawing on the UK Census for 1991 and 2001)

c) Please STATE whether you consider that the development will have a POSITIVE (1), NEUTRAL (0) or NEGATIVE (-1) impact on the COMMUNITY as a whole

d) How might any NEGATIVE impact be mitigated, or any POSITIVE impact enhanced?

3. Is the policy / plan / programme / project likely to lead to increased out-migration ?

Is the process of out-migration likely to result in a loss of Welsh speaking households?

Will the change be permanent or temporary?

a) Please DESCRIBE your overall assessment

b) Please STATE previous evidence (local / national case studies drawing on the UK Census for 1991 and 2001)

c) Please STATE whether you consider that the development will have a POSITIVE (1), NEUTRAL (0) or NEGATIVE (-1) impact on the COMMUNITY as a whole

d) How might any NEGATIVE impact be mitigated, or any POSITIVE impact enhanced?

4. Is the policy / plan / programme / project likely to lead to a changing age structure of the community? Might it:

Lead to young / middle-aged / older Welsh speaking people leaving / moving into the area, leading to:

Changes in traditional activity patterns, resulting in an increasing desire to move away?

Social tensions / break-up of traditional social networks

a) Please DESCRIBE your overall assessment

b) Please STATE previous evidence (local / national case studies drawing on the UK Census for 1991 and 2001)

c) Please STATE whether you consider that the development will have a POSITIVE (1), NEUTRAL (0) or NEGATIVE (-1) impact on the COMMUNITY as a whole

d) How might any NEGATIVE impact be mitigated, or any POSITIVE impact enhanced?

QUALITY OF LIFE**5. Is the policy / plan / programme / project likely to have an impact on the health of local people? Might it:**

Increase the risk of illness, therefore reducing the desirability to live in the community?

Potentially make life more expensive, therefore increasing the risk of financial problems / stress of the local Welsh speaking population

a) Please DESCRIBE your overall assessment

b) Please STATE previous evidence (local studies or Index Deprivation)

c) Please STATE whether you consider that the development will have a POSITIVE (1), NEUTRAL (0) or NEGATIVE (-1) impact on the COMMUNITY as a whole

d) How might any NEGATIVE impact be mitigated, or any POSITIVE impact enhanced?

6. Is the policy / plan / programme / project likely to have an impact on the amenity of the local area? Might it:

Deteriorate the environmental quality, therefore reducing the desirability to live in the community?

a) Please DESCRIBE your overall assessment

b) Please STATE previous evidence local environmental assessments or residents' surveys)

c) Please STATE whether you consider that the development will have a POSITIVE (1), NEUTRAL (0) or NEGATIVE (-1) impact on the COMMUNITY as a whole

d) How might any NEGATIVE impact be mitigated, or any POSITIVE impact enhanced?

7. Is the policy / plan / programme / project likely to lead to the threat of increased crime or violence in the community? Might it:

Increase the risk of crime or violence, therefore reducing the desirability to live in the community?

a) Please DESCRIBE your overall assessment

b) Please STATE previous evidence (local crime figures / police records from areas subject to similar developments)

c) Please STATE whether you consider that the development will have a POSITIVE (1), NEUTRAL (0) or NEGATIVE (-1) impact on the COMMUNITY as a whole

d) How might any NEGATIVE impact be mitigated, or any POSITIVE impact enhanced?

ECONOMIC FACTORS

8. Is the policy / plan / programme / project likely to have a detrimental impact on local businesses? Might it:

Potentially lead to local – Welsh speaking – businesses closing down, due to:

A decline in overall local population?

An increase of – non Welsh speaking – residents ?

An increase in harmful / helpful competition ?

a) Please DESCRIBE your overall assessment

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- b) Please STATE previous evidence (local business surveys or economic assessments)
- c) Please STATE whether you consider that the development will have a POSITIVE (1), NEUTRAL (0) or NEGATIVE (-1) impact on the COMMUNITY as a whole
- d) How might any NEGATIVE impact be mitigated, or any POSITIVE impact enhanced?

9. Is the policy / plan / programme / project likely to have a detrimental impact on local jobs? Might it:

- Create jobs for the local – Welsh speaking – population (perhaps by virtue of local Welsh speaking people having the rights skills)?
- Threaten jobs of the local – Welsh speaking – population (perhaps by causing the closure of local businesses)

- a) Please DESCRIBE your overall assessment
- b) Please STATE previous evidence (local studies)
- c) Please STATE whether you consider that the development will have a POSITIVE (1), NEUTRAL (0) or NEGATIVE (-1) impact on the COMMUNITY as a whole
- d) How might any NEGATIVE impact be mitigated, or any POSITIVE impact enhanced?

10. Is the policy / plan / programme / project likely to lead to greater economic diversity? Might it:

- Potentially lead to a greater number of different jobs for the local – Welsh speaking – population due to economic diversification?
- Lead to increased in-migration of non-Welsh speakers?

- a) Please DESCRIBE your overall assessment
- b) Please STATE previous evidence (local studies or UK Census)
- c) Please STATE whether you consider that the development will have a POSITIVE (1), NEUTRAL (0) or NEGATIVE (-1) impact on the COMMUNITY as a whole
- d) How might any NEGATIVE impact be mitigated, or any POSITIVE impact enhanced?

11. Is the policy / plan / programme / project likely to have an impact on local wage / salary levels? Might it:

- Potentially increase / decrease wage / salary levels due to increase work force / business competition ?

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- a) Please DESCRIBE your overall assessment

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- b) Please STATE previous evidence (local studies or Index of Income Deprivation)
- c) Please STATE whether you consider that the development will have a POSITIVE (1), NEUTRAL (0) or NEGATIVE (-1) impact on the COMMUNITY as a whole
- d) How might any NEGATIVE impact be mitigated, or any POSITIVE impact enhanced?

12. Is the policy / plan / programme / project likely to have an impact on the average cost of housing? Might it:

- Force local – Welsh speaking – people to leave the community?
- Potentially lead to an increase in homelessness / housing stress amongst local – Welsh speaking – households?
- Prevent local Welsh speaking people from returning to the area / community?

- a) Please DESCRIBE your overall assessment
- b) Please STATE previous evidence (local studies of estate agents or information gathered through HNAs)
- c) Please STATE whether you consider that the development will have a POSITIVE (1), NEUTRAL (0) or NEGATIVE (-1) impact on the COMMUNITY as a whole
- d) How might any NEGATIVE impact be mitigated, or any POSITIVE impact enhanced?

INFRASTRUCTURE SUPPLY

13. Is the policy / plan / programme / project likely to have an impact local schools? Might it:

- Threaten / secure local schools due to an increase / decrease of student rolls?
- Alter the balance between Welsh-speaking and non-Welsh speaking students?

- a) Please DESCRIBE your overall assessment
- b) Please STATE previous evidence (local studies and data from LEAs)
- c) Please STATE whether you consider that the development will have a POSITIVE (1), NEUTRAL (0) or NEGATIVE (-1) impact on the COMMUNITY as a whole
- d) How might any NEGATIVE impact be mitigated, or any POSITIVE impact enhanced?

14. Is the policy / plan / programme / project likely to have an impact on health care provision? Might it:

Threaten / secure local – Welsh medium – facilities / services?

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a) Please DESCRIBE your overall assessment

--

b) Please STATE previous evidence (local studies and information for Local Health Trusts)

--

c) Please STATE whether you consider that the development will have a POSITIVE (1), NEUTRAL (0) or NEGATIVE (-1) impact on the COMMUNITY as a whole

--

d) How might any NEGATIVE impact be mitigated, or any POSITIVE impact enhanced?

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15. Is the policy / plan / programme / project likely to have an impact on the provision of local services, such as shops / post offices / banks / pubs? Might it:

Threaten/secure local shops / post offices / banks / pubs in Welsh speaking communities, therefore forcing certain sections of the population out of the area / community e.g. the elderly or disabled, or the young?

--

a) Please DESCRIBE your overall assessment

--

b) Please STATE previous evidence (local studies commercial information available from business directories / VAT office, or business rating register)

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c) Please STATE whether you consider that the development will have a POSITIVE (1), NEUTRAL (0) or NEGATIVE (-1) impact on the COMMUNITY as a whole

--

d) How might any NEGATIVE impact be mitigated, or any POSITIVE impact enhanced?

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SOCIAL AND CULTURAL ASPECTS**16. Will the policy / plan / programme / project potentially lead to social tensions, conflict or serious divisions within the – Welsh speaking – community? Might it:**

Have a significant uneven effect on different parts of the local community, potentially advantaging some groups and disadvantaging others?

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Violate traditional values of certain parts of the community?

--

a) Please DESCRIBE your overall assessment

--

b) Please STATE previous evidence (local studies / assessments)

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c) Please STATE whether you consider that the development will have a POSITIVE (1), NEUTRAL (0) or NEGATIVE (-1) impact on the COMMUNITY as a whole

d) How might any NEGATIVE impact be mitigated, or any POSITIVE impact enhanced?

17. Will the policy / plan / programme / project potentially lead to changes in local – Welsh – traditions/culture? Might it:

Result in local – Welsh speaking – households moving away from the areas?

Lead to significant increase of non-local – non-Welsh speaking – households?

Lead to an erosion of family ties or other social networks?

Lead to significant changes to the economic or social context, threatening traditional lifestyles?

Impact on local – Welsh speaking – households by introducing / accelerating social change?

a) Please DESCRIBE your overall assessment

b) Please STATE previous evidence (local studies / assessments)

c) Please STATE whether you consider that the development will have a POSITIVE (1), NEUTRAL (0) or NEGATIVE (-1) impact on the COMMUNITY as a whole

d) How might any NEGATIVE impact be mitigated, or any POSITIVE impact enhanced?

18. Will the policy / plan / programme / project likely to have a potential impact on local voluntary / activity / youth groups? Might it:

Force local people active in local groups to move out of the community, due to:

Drive an increase in unemployment / economic stress?

Drive an increase in house prices / housing stress?

a) Please DESCRIBE your overall assessment

b) Please STATE previous evidence (local studies / assessments / Indexes of Deprivation)

c) Please STATE whether you consider that the development will have a POSITIVE (1), NEUTRAL (0) or NEGATIVE (-1) impact on the COMMUNITY as a whole

d) How might any NEGATIVE impact be mitigated, or any POSITIVE impact enhanced?

Notes

Question 1 considers the basic issue of population growth or decline resulting from a development. Most forms of development have a propensity to stabilise population or drive growth. But a basic question is whether the development will lead to endogenous growth (e.g. create local jobs and allow people who would otherwise have left the community to remain) or whether it will increase the likelihood of in-migration. Whilst in-migration is often a positive force in rural communities, substantial levels of growth are likely to impact on social balance (in terms of age and income structure, and socio-cultural background). Judgements must be made as to whether population change will positively or adversely affect the language's place as part of the social fabric of a community. Judgements are likely to draw on previous experience, with part assessments drawing on UK Census data.

Question 2 addresses the issue of in-migration more directly. Some developments are likely to cause social reconfigurations. For instance, a residential development for retirement purposes in a community with a young age structure is unlikely to serve a local need and will cause permanent social change. A holiday home development, however, is unlikely to cause any permanent shift in social structure, and may lead to economic benefits assessed in later questions. Again, judgements will be grounded in experience, with supporting data drawn from the Census.

Question 3 looks at out-migration. Most developments are not associated with out-migration, but with some notable exceptions. The conversion of essential services (for example, shops or schools) to residential use may discourage people from remaining in a community. Un-neighbourly land-uses (waste facilities or incinerators) or those perceived as generally inappropriate in remoter rural areas (including large-scale asylum centres) may have a similar effect. Once again, judgements will need to be based on the precedent of previous assessments.

Question 4 acknowledges that population movements or losses are rarely uniform across the age profile. Developments are likely to affect younger people, families, single people or older households in different ways. A development that promotes retirement may reduce housing opportunities for younger people. A development that does not create jobs or housing opportunities tailored to the needs of younger people may inadvertently remove such people from the local community. Developments that do not promote and help sustain social balance are likely to prove unsustainable in social and cultural terms.

Question 5 seeks a link between health and community. Health deprivation may increase if housing is unsuited to needs; if roads and infrastructure is poorly planned or if industrial development contributes to a poor quality living environment. Equally, a lack of integrated green space in development proposals may diminish the attractiveness of an area. Such processes may not differentially affect Welsh / non-Welsh residents. However, if a settlement is predominantly Welsh – or Welsh is shown to be part of the social fabric – then reductions in quality of life can impact on community stability; people who can afford to move away may do so, and such places may become socially polarised. The flip-side of course, is that non-Welsh speaking migrants are less likely to gravitate to unattractive places, unless their key concern is cost rather than quality of life and aesthetic appeal.

Question 6 tackles a related issue. Any deterioration in environmental quality will have a similar impact, reducing the attractiveness of particular towns, villages or neighbourhoods. A reduction in environmental/aesthetic quality, or in general amenity, may fuel out-migration

of households with greater spending power, and cause an influx of lower income households. This is likely to impact on the balance of Welsh / English speaking residents, as well as the balance of different income and social groups. Communities must offer a certain level of quality of life if they are to remain socially stable and cohesive.

Question 7 focuses on crime: crime – like health and amenity – will influence long term social stability and cohesion. A sustainable community is one in which crime is kept at a tolerable level. Again, increases in crime – or heightened fear of crime – may drive people away or discourage balanced population growth. It also results in personal stress that may accentuate health concerns. All these quality of life issues threaten social balance: people who can afford to will move away; communities may become dominated by those lower income groups who have least choice in where they live. These social imbalances are likely to work contrary to the interests of the Welsh language, which can only thrive in balanced, sustainable communities.

Question 8 turns to the economic dimension of community. New development may lead to the establishment or closure / downsizing of businesses within a locality, with a possible impact on provisions and the price of goods. This may lead to sections of the population being unable to access those goods or it may lead to residents being offered a greater choice. A key judgement to make is to what extent the range and choice of businesses are located within close proximity to each other and whether this benefits or dis-benefits communities.

Question 9 recognises that new developments can affect the number, type and quality of jobs available to the local labour market, dependent on the existence of a range of skills. A shortage in some skills may lead to a shift in the community profile as workers decided to move to locations where they can utilise their skills effectively.

Question 10 takes this a step further and acknowledges that new development may create new employment opportunities, with specific skills required: e.g. leisure / tourism development based on cultural industries may require greater utilisation of the language as a labour market skill. Assessments would have to be made in relation to the potential for economic diversification and the ability to accommodate new work forces.

Question 11 Competition within employment sectors may lead to labour market decisions on where they take up employment and the perceived quality of employment opportunities. In a competitive global economy, communities reliant on key employment may be vulnerable to adverse salary changes and business competition.

Question 12 Fluctuations in the demand for housing is likely to lead to either an increase or decrease in house prices and this is likely to affect different sections of the community disproportionately. House prices, when associated with other forms of housing pressure may affect the ability of some to access housing. This may also cause either in-migration or out-migration and cause a specific impact on the extent of language usage within a community. Housing development and fluctuating house prices may also lead to an increase in commuting. This may be a symptom of more general changes in the housing market.

Question 13 relates to the sustainability of local educational facilities. A development may lead to essential local services, such as schools, benefiting from an increase in younger population. A lack of development and, in turn, no change in the existing age profiles of

communities, could threaten the future viability of schools. A lack of housing choice and provision may also affect decisions on whether growing younger families would wish to remain within a particular locality. More families make explicit decisions these days relating to school placement selection and it can be a contributing, possibly determining, factor in house-moving.

Question 14 considers health care provision in the community. As the numbers of elderly people increase proportionately to the number of younger people, a key determining factor for people deciding whether to remain in an area or move to an area for the first time, is the availability of health facilities. Retention or establishment of health care facilities in a community could affect language viability, particularly where health centres have become social gathering places, supporting local Welsh-speaking networks. The lack of facilities may cause elderly people to move home, or lead to decisions where families take painful decisions to assist the move to elderly relations to other locations.

Question 15 relates to the provision of services. Different types of development may impact upon the availability and viability of existing community services, even if those new developments are located some distance away. Larger retail development, for example, may impact on local services and impact upon social networks within the community that may presently act as meeting places, supporting community interaction. Decisions taken by larger businesses to relocate or close premises may also affect different sections of the population disproportionately. This would be dependent on the provision of public transport and private vehicles and the ease of access to them. This may also lead to the need to move home causing an effect on the sustainability of a community long-term.

Question 16 turns to social and cultural concerns. Some forms of development have a readily identifiable propensity to fuel social tension – for example, developments that are obviously out of scale with communities, or uses that appear unsuited to the character / economy of a particular area. Large scale holiday village developments have in the past been met with vociferous protest, as have proposals for youth detention or asylum centres. But often the potential for conflict is less obvious and more subtle. Retirement developments that may serve an external demand can fuel local unrest; they may lead to the arrival of non-Welsh speaking households. Likewise, new shopping centres may threaten local stores, which have played an integral role in local communities for many years. All such developments may be met with resentment. Certainly, they can violate local values and lead people to believe that cultural concerns are not being taken seriously. Overall, they may have a demoralising effect in Welsh communities.

Traditions and culture are underpinned by kinship and social networks.

Question 17 recognises that many different forms of development may lead to the effective removal of Welsh speakers or the introduction of non-Welsh speakers. If this happens, then family ties may be severe; social networks may be broken; and social cohesion can be lost. Again, out of scale development may pose a cultural threat, diluting or breaking those networks on which traditions are built. The recognition of such potential impacts is very much in the hands of local authorities, who will need to consult with community representatives.

Building on Question 17, the next Question (18) acknowledges that this loss of social cohesion – combined with developments that disproportionately affect younger people – i.e. new employment uses that fail to address local needs, or housing that is unaffordable to first

time buyers – may have a catastrophic impact on community institutions. These can be central to the vitality of Welsh communities. Once gone, they are unlikely to return. Again, predicting such problems is a task for planning authorities in consultation with community groups. Authorities / local groups must draw on their knowledge of such institutions (Urdd involvement, the wellbeing of local eisteddfodau and so forth) of their current vitality, and the incremental impacts of developments that might disrupt social balance and local involvement over time.

Overall Impact Index Assessment

The Overall Impact Assessment Index builds upon the work undertaken in the Linguistic Impact Assessment previously undertaken. The answers to these questions provide numerical assessments of community impact (i.e. the positive, neutral, or negative scores for part c) of each question and these are aggregated to from (i) a base community impact index and (ii) indexes of impact across each of the five community dimensions. On the basis of language profiling (following the framework methodology set out in the main toolkit documentation), assessors will have determined whether the Welsh language has "high", "middle" or "low" importance in the community. Base index scores are converted into high, middle and low language impact scores (1 = high positive image, to -1 = high negative impact). It is a matter of local judgement as to which score is deemed appropriate.

Summary Impact Table	Population Characteristics				Quality of Life			Economic Factors				Infrastructure Supply			Social and Cultural Aspects		
	General Shift	In-Migration	Out-Migration	Age Structure	Health	Amenity	Crime	Business	Local Jobs	Useable Diversity	Income	Housing	Schools	Health Care	Services	Tensions / Conflict	Culture
Base Index	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Dimensional Index			0			0				0				0		0	0
Language 1 HIGH (1.0)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Language 2 MIDDLE (0.7)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Language 3 LOW (0.5)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Overall (Base) Index Score: Impact on the COMMUNITY in general terms: 0

Language Impact Scores: If Language considered to have HIGH importance: 0
If Language considered to have MIDDLE importance: 0
If Language considered to have LOW importance: 0

EXPLANATORY NOTES:

1. Calculation of Base Index Scores

Scores to be given "out of 18" (divisible by 18) to give base impact measure, or divisible by total number of questions that can be answered. hence: "0.1 to 1.0" denotes grades of positive impact, "0" denotes neutral, "-1.0 to -0.1" denotes grades of negative impact from "-1.0" acute negative to "-0.1" mild negative.

2. Conversion to Language Impact

Use of "high", "middle" and "low" significance is a local decision. For example, where the proportion of Welsh speakers is high (90%), significance of impact might be judged high: therefore language impact score will equal base score; where there are fewer Welsh speakers (e.g. 30%) then importance might be judged "middle" (language scores adjusted downward by factor of 0.5). But in some communities, the desire to promote the language may mean that it retains its high importance. Elsewhere, authorities may use a low significance factor.

3. Dimensional Impacts

The impact of a development / policy within each "dimension" of community can be judged separately. The summary impact table above gives individual scores for "population", "quality of life" and so forth.

KEY SOURCES OF CURRENT INFORMATION ON THE WELSH LANGUAGE

1. **Statistics regarding the number and percentages of Welsh speakers:**
(the information derives originally from the 2001 Census, table CAS 146)
 - a) The Welsh Language Board's analysis of the table:
according to Electoral Area and detailed age groups, including percentages:
<http://www.bwrdd-yr-iaith.org.uk/cy/cynnwys.php?cID=6&pID=109&nID=174>
according to Community and detailed age groups, including percentages:
<http://www.bwrdd-yr-iaith.org.uk/cy/cynnwys.php?cID=6&pID=109&nID=412>
 - b) the National Statistics Offices' interpretation of the table:
according to Electoral Area, or production area, and detailed age groups:
<http://www.nomisweb.co.uk/home/census2001.asp>
according to the Community and 3 age groups:
<http://www.statistics.gov.uk/StatBase/Product.asp?vlnk=11387>
2. **School Statistics:**
(all local education authorities have their own details which is based on the Pupil Level Annual School Census (PLASC)).

There is a summary of some of the education authority level statistics available at:
'Welsh in Schools". The latest edition:
<http://www.cymru.gov.uk/keypubstatisticsforwalesheadline/content/schools-teach/2004/hdw200402194-w.htm>

ADDITIONAL INFORMATION

1. **Circulation of Papurau Bro and National Welsh Newspapers –** Information about individual Papurau Bro can be obtained from the Welsh Language Board: www.bwrdd-yr-iaith.org.uk
In order to obtain circulation figures for publications such as Golwg and Y Cymro you will need to contact them directly.
2. **Local level projects or language schemes –** the Mentrau Iaith/Language Ventures are responsible for the majority of local activities, details of all the Mentrau can be obtained from:
http://www.mentrau-iaith.com/index.php?page_uid=7775b53d&lang=1
The Welsh Language Board also have a local action plan for promoting the Welsh Language in specific areas of Wales. A list of these areas can be obtained via operational officers by contacting the Board (see link 1. above).
3. **Number of non-Welsh speaking children who are registered at primary schools including information about historical trends –** The document “Welsh in Schools” (see part 2 on previous page) provides information on a county and national basis. The data for January 2003 is the most recent published information available on a county basis. Local Education Authorities will need to be approached in order to gain access to detailed local information, re. individual schools.
4. **Number of adult Welsh learners (or registrations by adults for Welsh courses) in a specific area and historical trends –** this information will be gathered and stored by Elwa and the source is LLWR, i.e. Lifelong Learning Wales Record/Cofnod Dysgu Gydol Oes Cymru. The contact details regarding this Welsh for Adults programme is available here:
http://www.elwa.org.uk./doc_bin/Business%20General/190505_all_you_need_to_know_about_speaking_welsh_w.pdfs.pdf
A list of local officers from CYD is available here:
<http://www.aber.ac.uk/cyd/swyddogion.html>
5. **Number of Welsh / bilingual nursery schools and the number of children attending these schools –**
Mudiad Ysgolion Meithrin’s pre-school provision includes Cylchoedd Ti a Fi for children from 6 months up to 2 and a half years of age and Cylchoedd Meithrin for children from 2 and a half years up to school age. Local Education Authorities, and other providers, also provide pre-school education for children between 3 yrs old and school age.

Information regarding Ti a Fi and Ysgolion Meithrin groups can be obtained by contacting the officers from the Mudiad Ysgolion Meithrin Organisation—http://www.mym.co.uk/structure/staffing_cym.html

Early Years Partnerships in each authority area can provide information about other provision by private sector providers and the local education authority

6. **Existence of Eisteddfodau Bro** – the Cymdeithas Eisteddfodau Cymru Society provides a list of all the Eisteddfodau bro that are a member.
7. **Existence of any other cultural/linguistic activities in the area**– there is no source of information available about this type of info. Initially you should contact the local Menter Iaith/Language Venture (see link in part 2 above) or the Urdd's regional officers, contact information is available here: www.urdd.org/index.html

DEVELOPMENT PLAN POLICIES ON THE WELSH LANGUAGE

Appendix E sets out the policies contained in Unitary Development Plans (UDPs) in Wales that relate to the Welsh language. This survey of LPAs was carried out during the summer of 2005. Of the 25 Local Planning Authorities in Wales producing UDPs (Pembrokeshire & Pembrokeshire Coast National Park are producing a joint plan), 11 have produced a specific policy relating to the Welsh language. These policies all have the same general aim to seek to ensure that developments do not cause demonstrable harm to the Welsh language in communities where the use of the language is strong. Most of these policies refer to the production of Supplementary Planning Guidance which will be used to support the implementation of the policy.

Local Authority	Plan (Status)	Policy/Amplification & Explanatory Notes/Author's Comment +
Blaenau Gwent County Borough Council	Modification Stage (March 2004)	<i>No Welsh language policies, although the Inspector recommended in his Report that a modification be made in Part 1 of the UDP to include a reference to the language. He also reported that the social mix within the Borough is such that it does not need to be taken specifically into account in the Plan's policies.</i>
Brecon Beacons National Park Authority	Pre-Inquiry Proposed Changes (March 2005)	<p>The Welsh Language</p> <p>5.120 Language plays a major role in the character and way of life of communities, and is a key part of Welsh culture. Government guidance requires that language issues be taken into account in land use planning policies, and the NPA wishes to facilitate the continued and growing use of the Welsh language.</p> <p>5.121 According to the 2001 Census, communities in the west of the Park speak more Welsh than those in the east. Welsh-speaking communities need to be protected from developments that would lead to dilution of the language and therefore the social and cultural characteristics of the community. Phasing may be required to allow for the gradual, natural absorption of new developments into an area. In addition, appropriate economic, residential and social developments that would strengthen Welsh culture should be encouraged.</p> <p>5.121a The policy will normally be applied in Community and Town Councils areas with over 30% Welsh speaking population, as identified in the Census. Where the community average does not reflect the existence of concentrations of Welsh speakers within villages in the community or Town Council areas, a more qualified and sensitive measurement will be required. To this end and subject to the outcome of National research, the NPA may conclude that it is necessary to prepare Supplementary Planning Guidance (SPG) to provide detailed guidance on making judgments as to whether the use of the language forms part of the social fabric of the Plan area; to measure impact of policies and proposals on the Welsh Language and to produce a Welsh Language Impact Assessment Methodology. In the interim a precautionary approach may be adopted where it is considered that a proposal would pose a significant threat to the language within a community.</p> <p>Policy ES34: The Welsh Language</p> <p>Proposals for development in areas where the Welsh language is an important part of the culture and social life of the community will be permitted where:</p> <ul style="list-style-type: none"> i) it can be demonstrated that the proposal would not have a detrimental impact on the social, linguistic and cultural characteristics of the community; and ii) phasing of development can take place if necessary to allow for the gradual absorption of new development
Bridgend County Borough Council	Adopted UDP (May 2005)	<i>No Welsh language policies however, reference is made in Part 2 of the UDP to the Welsh language: The Council has also taken into account the advice contained in Planning Policy Wales (2002) (para. 2.10) and PG(W)TAN20 – ‘The Welsh Language – Unitary Development Plans and Planning Control’. It does not consider that there are communities within the County Borough where the use of the Welsh Language is currently part of their social fabric for the purpose of either strategic or detailed planning policy generation. (para. 2.3.12)</i>

Caerphilly County Borough Council	Modification stage (Jan 2003) *	No Welsh language policies.
Cardiff Council	Deposit UDP (Oct 2003). *	<p><i>No Welsh language policies, although reference is made in Part 1 to the language: The Welsh Language</i></p> <p>1.2.13 Planning Policy Wales (2002)⁶ requires planning authorities to consider whether they have communities where the use of the Welsh language is part of the social fabric, which should be taken into account in the formulation of plan policies.</p> <p>1.2.14 According to the Council's Welsh Language Scheme, 6.6% of the population of Cardiff is Welsh speaking. This represents a larger number of people (20,800) than in many "Welsh-speaking areas". However, while there is some variation in the proportion of Welsh speakers within Cardiff, the language is not area specific and there are no localities where the proportion is considered to be high enough to have an impact on land use planning policy considerations.</p> <p>1.2.15 Notwithstanding this, it is the policy of the County Council to encourage use of the Welsh language in all spheres of life. Previous consultation documents have been published in English and Welsh, as is this deposit plan.</p>
Carmarthenshire County Council	Pre-Inquiry Proposed Changes (Nov 2003). Awaiting Inspector's Report.	<p><i>Part 1:</i> Welsh Language and Culture</p> <p>1.24 The 1991 Census states that Carmarthenshire has a Welsh-speaking population of 54.8%. This compares with a figure of 18.7% for Wales as a whole. The highest proportion of the County's Welsh speakers are within the 65 years and over age group, where 67% speak the language. A high proportion also exists within the 3 to 15 years age group, with 54.5% being able to speak Welsh. South and south-east Carmarthenshire have the highest proportion of Welsh speakers, although strongholds of the language are also found in certain rural areas.</p> <p>1.25 The above figures confirm that the Welsh language and its associated culture are an important and integral part of community life within Carmarthenshire. Accordingly, the protection of the Welsh language is considered to be an important policy issue for Carmarthenshire County Council.</p> <p>1.26 The Authority supports the use, and enhances the status of the Welsh language, through its many activities and operates a bilingual policy for its day-to-day administration. The Welsh language is a material consideration in the preparation of the UDP and the settlement policy as presented in the Sustainable Strategic Settlement Framework seeks to ensure the continued viability of identified communities throughout the county and particularly in rural locations.</p>

	<p>CUDP 5 - Welsh Language/Culture Policy It is the policy of Carmarthenshire County Council that all development will have full regard to safeguarding and making a positive contribution to the social, cultural and linguistic characteristics of the county.</p> <p><i>Part 2:</i> The Welsh Language & Culture</p> <p>12.9 The Welsh language has a central place in the social, cultural and economic life of the County and its protection and promotion is an important policy objective of the UDP. The Council has also developed a Welsh Language Strategy, the main aim of which is to secure a firm and vibrant future for the language in Carmarthenshire.</p> <p>12.10 Until recently the rural areas of Carmarthenshire were perceived to be the backbone of Welsh communities within the County. However, recent demographic changes have meant that this perception is increasingly misleading. There has been a constant in-migration to rural Carmarthenshire over the last 25 years and by 1991 only two rural communities had percentages of Welsh speakers above the threshold of 70% - Tre-lech and Aber-nant. However, excluding the traditionally English speaking communities of the extreme south west, all the other rural communities have managed to maintain their percentages of Welsh speakers above the 50% mark.</p> <p>12.11 The south east of the County on the other hand offers a completely different picture. It is now the case that it is here, in the Aman and Gwendraeth valleys in particular, that Welsh is at its strongest within the County. Indeed, it has been widely recognised that the high density of Welsh speakers in these western valleys are of national significance. According to the 1991 Census figures the communities of Cwarter Bach and Pontyberem have the highest percentages of Welsh speakers in Carmarthenshire:</p> <ul style="list-style-type: none">•Cwarter Bach (81%) and•Pontyberem (80%) <p>12.12 Of the 19 industrialised communities between the Tywi and Llwchwr rivers 9 have maintained a Welsh speaking percentage of over 70%. Welsh speakers are a minority in only three communities – Llanelli, Llanelli Rural and Cefn Sidan. The Llanelli community has the least Welsh speakers per head of population but even then it accounts for a third of the populace (33.3%) – 7,635 speakers, while Llanelli Rural has 8,550 Welsh speakers.</p> <p>12.13 Planning Policy Wales (March 2002) requires that where the use of the Welsh language is part of the social fabric of communities, then this should be taken into account in the formulation of land use policies. The Council recognises that the scale and type of housing and employment provision within particular communities will impact upon the well being of the language. However, there is also recognition that this provision is one of a number of elements which will impact upon the future vitality of the language, many of which are outside the scope of the planning system. For example, education and community activities.</p>
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		<p>12.14 The Sustainable Strategic Settlement Framework of the UDP seeks to provide a balanced growth within the Plan area's settlements ensuring that the provision of development opportunities are appropriate to their scale and need. The Plan will direct the majority of development to the County's main settlements, whilst also recognising the need to sustain rural communities and their associated social, cultural and linguistic characteristics.</p> <p>12.15 It is important to note that Planning Policy Wales 2002 stipulates that UDP policies should not seek to introduce any element of discrimination on linguistic grounds.</p> <p>C5 - Welsh Language and Culture</p> <p>It is the policy of Carmarthenshire County Council to resist development proposals which would have a detrimental impact on the long-term vitality and viability of the Welsh language and culture.</p> <ul style="list-style-type: none"> • To afford protection to and further the promotion of the Welsh language and culture • To resist development proposals of a scale and character which are likely to pose a threat to the needs and interests of the Welsh language. • The effect and impact of the UDP on the Welsh language will be monitored as part of the monitoring and review exercise (see "Monitoring and Review" section). <p>Note: Supplementary Planning Guidance will be prepared, which will provide guidance on the measurement of detrimental impact and the use of Linguistic Impact Assessments in determining planning applications</p>
Ceredigion County Council	Proposed Changes (Feb 2004)	<p>GEN3.1 Development and the Welsh Language</p> <p>Development will be subject to an assessment of the potential impact on the social, linguistic and cultural characteristics of the settlement, where the Welsh language is intrinsic to the social cohesion of that settlement. Phasing however may be required to allow for the gradual, natural absorption of new development in to the community. Where development would have an unacceptable adverse impact on the Welsh language proposals should be refused.</p> <p>Reasons for Policy GEN3.1</p> <p>The scale and rate of development may affect the characteristics of existing settlements in a number of ways. The Council is keen to ensure that development is appropriately located with least impact and within the capacity of each settlement to accommodate it. Both language and culture contribute to the quality of life and the characteristics of the County's settlements and the impact of development on these factors needs to be assessed when considering new development proposals. CER1.1 Community Impact Assessment provides the mechanism to consider impacts of new development and to consider where phasing maybe appropriate. Generally the Plan seeks to promote growth in the locations most capable of absorbing growth.</p>

		<p><i>Proposed Changes</i> <i>A number of additional references to the Welsh language have been inserted to various policies, in particular Housing policies. The following is to be inserted as supporting text to the housing chapter.</i></p> <p>PC 141 Development and the Welsh language The importance of protecting and sustaining the Welsh language is considered to be an integral part of the all communities within the County. The importance of protecting and sustaining the Welsh language is, therefore, an integral part of the UDP, its policies and proposals. The needs and interests of the Welsh language were taken into account, along with economic, environmental and other social concerns in determining the scale and location of provision for future housing throughout the County. Where it can be identified at the time of an application that a proposed development will have an unacceptable harm on the Welsh language, the Council may refuse the proposal in accordance with Objective GEN3 and policy GEN3.1, subject to other material considerations which may be applicable. The Council can also require that new development is phased according in an attempt to reduce the rate of impact on the Welsh language. Ensuring that development occurs at a gradual rate is also more likely to ensure that the new housing is used to accommodate needs from within the community. It is anticipated that more guidance will be made available, nationally and locally, during the plan period with regard to how the impact of development on the Welsh language can best be measured. Such guidance will aid in the implementation of the UDP policies to ensure that new residential development does not unacceptably harm the Welsh language.</p>
Conwy County Borough Council	Draft UDP (April 2001) *	<p>Part 1 Policy: Policy ST11 The Welsh language is an important element in the business, social and cultural life of the County Borough. Any development that undermines the position of the Welsh language in the community will be discouraged.</p> <p>3.25 It is the policy of the Government and the Council to encourage the dual use of Welsh and English. Government advice on this matter is contained in Planning Guidance (Wales), Technical Advice Note (Wales) 20: The Welsh Language – Unitary Development Plans and Planning Control, June 2000. It says that “The land use planning system should also take account of the needs and interests of the Welsh language and in so doing can contribute to its well being.” The main concerns are with the distribution of new housing and of economic growth, and their effect on the linguistic balance in different areas.</p> <p>3.26 According to the Census of Population, the number of Welsh speakers in the UDP area rose from 28,100 in 1981 to 28,800 in 1991. However, the proportion of Welsh speakers fell from 31.5% in 1981 to 29.2% in 1991, because of a much bigger increase in the overall population. But, the traditional impression of Welsh as a predominately rural language spoken by an increasingly ageing population is misleading. For example, more than half of Welsh speakers reside in the urban coastal belt. The 1991 Census also indicated that Welsh was increasingly the domain of the young, with 32.7% of Welsh speakers in the Plan area, in the 3-24 age group, similar to the all-Wales percentage. It is, however, true to say that the proportion of Welsh speakers in the population is lower in the urban coastal belt than in the rural communities.</p> <p>3.27 The Welsh language is widely used throughout the Plan area. It is the medium of education in most</p>

		<p>village schools, in at least one primary school in each of the main towns and in two of the seven state secondary schools in the County Borough. The language is used in many artistic, literary and musical competitions every year, and there are a number of local organisations for which knowledge of the language is a prerequisite of membership e.g. Merched Y Wawr and various male voice choirs. The National Eisteddfod of Wales was held at Abergel in 1995 and the Urdd National Eisteddfod in Penrhyn Bay in June 2000. The Welsh language is intrinsic to these events and both events attracted large numbers of residents and visitors, either as competitors or spectators. The Urdd National Eisteddfod is the largest annual youth festival in Europe and will be returning to Llandudno in 2002.</p> <p>3.28</p> <p>The policy is intended to be used in conjunction with other policies in the Plan to prevent development which (i) is likely to cause an imbalance in the linguistic structure of a settlement or community, or (ii) exacerbate an existing imbalance, to the detriment of the Welsh speaking population. The policy will apply to all forms of development which by reason of its scale and character is likely to have an adverse effect on a settlement or community. The Council has set a relatively modest housing requirement for the Plan area in the Plan period and this should help to support the position of the Welsh language in the community. The Plan also seeks to encourage the visible use of Welsh, in signs and advertisements, and this topic is dealt with in Chapter 6 – Built Environment.</p>
Denbighshire County Council	Adopted UDP (July 2002)	<p>Policy GEN 7 - Welsh Language & Culture</p> <p>In considering development proposals in areas with a strong social, cultural and linguistic identity, particularly based on the Welsh language, special account will be taken of that identity to ensure that no demonstrable harm is caused to the character of the local community.</p> <p>The Welsh Language is an important component of the social fabric of the County. The Welsh Language is spoken by about 26% of the population of the County. In many rural communities in the south and west the Welsh language forms an important part of the social fabric of the area. In 14 out of 39 community areas the proportion of people who speak Welsh exceeds 50%. The highest concentrations of Welsh speakers are in Gwyddelwern, Cynwyd, Llandrillo, Cyffylliog, Betws Gwerfil Goch and Llanrhaeadr yng Nghinmeirch.. In these communities the proportion of Welsh speakers exceeds 60%.</p> <p>The Council considers that policies and proposals in the Unitary Development Plan should have regard to Welsh Language and that it should be a material consideration in the determination of planning applications and appeals. The scale and type of housing and employment provision influences the well being of the Welsh Language. However, it is only one factor. Many other influences outside the control of the planning system impact on the Welsh language and culture. Previous levels of housing growth including large estates in rural villages are known to have had a harmful effect on the Welsh language. The Strategy and policies of the UDP seek to provide a balanced growth aimed at meeting local needs for housing and jobs with most development provided in the main centres. The Plan also seeks to reduce previous levels of housing growth. No large-scale developments are proposed in the smaller settlements. The employment policies will provide job opportunities in rural areas and promote sustainable communities.</p>

		<p>Policy GEN7 is concerned with development proposals of a scale and character likely to have an unacceptable effect on the wider community including the intention to erect signs. Development, which causes an imbalance in or have an adverse effect on the linguistic and social balance of a settlement, will be resisted.</p> <p>The Plan will adopt a precautionary approach which will require the developer, where significant harm is likely, to include adequate information and explanation of the likely effects of the proposal on the Welsh language and cultural character of the area.</p> <p>The Council will prepare Supplementary Planning Guidance providing detailed guidance outlining, in particular, the recommended approach to measuring 'significant harm'.</p> <p>Whether or not an applicant speaks Welsh is not a material planning consideration and does not mean that a proposal can be favoured at the expense of relevant planning policies.</p> <p>The impact the Plan and development decisions may have on the Welsh language and culture will be closely monitored. The details of this will be contained in a separate monitoring report.</p>
Flintshire County Council	Deposit Draft (Sept 2003)	<p><i>Part 1 policy:</i></p> <p>STR9 Welsh Language and Culture</p> <p>Development proposals should have regard to and where appropriate reinforce the Welsh language and cultural identity of the community and area.</p> <p><i>Part 2 policy:</i></p> <p>GEN7 Welsh Language and Culture</p> <p>Development proposals in areas which have a STRONG Welsh linguistic and cultural identity:</p> <ul style="list-style-type: none"> a. must not cause demonstrable harm to the character of that community; b. and, where appropriate, should seek to reinforce the linguistic and cultural identity of that community. <p>4.24 The Welsh language is part of the social and cultural fabric of Wales and is spoken by around 20% of the population. Whilst in Flintshire the average is nearer 13% (at the time of the 1991 Census), the language is more prevalent in certain parts of the County and the impact that development can potentially have on these communities must therefore be taken into account in the UDP.</p> <p>4.25 The Welsh language is more prevalent in Flintshire's rural communities with around a third of the population speaking Welsh in communities like Treuddyn, Trelawnyd and Gwaenysgor, and Ysceifiog. The variation is significant however, with only 6 or 7% of the population speaking Welsh in communities like Queensferry, Broughton and Sealand which are close to the border with England.</p> <p>4.26 The Plan's strategy recognises the need to support and protect local linguistic and cultural identity, and the aim of Policy GEN7 is to ensure that where significant harm may occur as the result of development proposals, the developer will be required to submit supporting information which assesses and explains</p>

		<p>4.27 the likely effects on the Welsh linguistic and cultural identify the proposal may have.</p> <p>The Council is awaiting the results of the 2001 Census and the outcome of a Welsh Language Planning Study commissioned by a significant number of Unitary Authorities and supported by the National Assembly. The Council will use this information to prepare Supplementary Planning Guidance which will provide guidance on amongst other things, the means of assessing and measuring impacts and 'demonstrable harm'.</p> <p>Whether or not an applicant speaks Welsh is not a material planning consideration, and will not affect the normal application of relevant planning policies.</p>
Gwynedd Council	Deposit Draft (June 2004)	<p>Policy A2 - Linguistic Impact Assessments</p> <p>Proposals that would, because of their size, scale or location have an unacceptable impact on the social, linguistic or cultural cohesion of communities will be refused.</p> <p>2.2.5 Explanation - The essential first step to ensure that any development will blend into the surrounding area is an understanding of the local area. In the past, any analysis of the area surrounding a proposed development tended to concentrate on issues such as landscape, townscape, building materials, etc. However, the aims of sustainable development mean that there is a need to take a wider perspective. Particularly, more emphasis needs to be placed on the links between developments and communities, for instance, the link between new housing and the language and culture.</p> <p>2.2.6 The language and culture both contribute to the character of villages in the Plan Area. One important aim in the Plan is to strengthen and protect the culture and character of the County's indigenous communities. The size and scale of developments can have an effect on areas' linguistic and cultural character. The interests of the Welsh language are a basic consideration in all Plan policies and proposals; the linguistic character of villages has already featured as an important consideration in deciding where to limit open market housing provision.</p> <p>2.2.7 In order to make an informed decision on planning applications, comprehensive information is required on the likely effect of developments. Therefore, if there is any uncertainty about the impact of a development, due to its size, scale or location, on a community's social cohesion, developers will be asked to prepare a Linguistic Statement.</p> <p>2.2.8 The Local Planning Authority will prepare Supplementary Planning Guidance providing detailed guidance on relevant issues, including the recommended approach to measuring 'impact' and how to prepare a Linguistic Statement.</p>
Isle of Anglesey	Inspectors Report published.	<p><i>Proposed Changes (Oct 2002):</i></p> <p>Part One Policy 3 - Language and Culture.</p> <p>PO3. The Welsh language and culture will be promoted and protected by permitting developments which help strengthen those communities where the Welsh language is part of the social fabric of the community.</p>

	<p>Chapter 10a - Planning and the Welsh Language Reasoned Justification relating to UDP Strategy, Vision, Aim and Objectives and Part One Policies 1,2,3, and 7</p> <p>a) Background</p> <p>10a.1 The Welsh language is in use across Anglesey, although the intensity of that use varies between communities. People of all linguistic backgrounds can offer support, and make a contribution, to the future well being of the language on the island. At the time of the 1991 census Welsh speakers made up some 62% of the island's population aged 3 and over. Some 40% of the island's communities fell within areas where 70% of the population were Welsh speakers (map below).</p> <p>10a.2 Those communities where Welsh speakers were in a majority, and the language is in common everyday usage, are generally described as falling within "Y Fro Cymraeg" (the Welsh heartland). The results of the 2001 census will give an indication of the changing patterns of Welsh language use over time.</p> <p>10a.3 The Council notes representations and objections received during the preparation of this UDP that the housing and settlement strategy of the plan should be constructed around the linguistic patterns to be found on the island, and to provide special protection for the traditionally Welsh speaking communities. The UDP strategy has not taken that approach. The strategy that has been chosen is to promote sustainable communities. The plan seeks to promote their social, economic and environmental well being of towns and villages, including the use of the Welsh language, rather than develop strategy around one specific characteristic of the communities concerned.</p> <p>10a.4 Whilst an increasing number of people have been educated through the medium of Welsh as part of a bilingual system of education, there are fears expressed for the future of the Welsh language as a community language. To what extent land use planning decisions alone are central to deciding the future health of the language, as opposed to other factors e.g. economic and education migration or the media, has not been clearly established.</p> <p>b) Planning Policy</p> <p>10a.5 Planning Policy for Wales (March 2002) states that "the land use planning system should also take account of the needs and interests of the Welsh language and in so doing contribute to its well being". Technical Advice Note (TAN) 20 provides more detail on this element of policy.</p> <p>10a.6 Planning Policy Wales (March 2002) makes specific mention of the "distribution and phasing of housing development taking into account the ability of different areas and communities to accommodate the development without eroding the position of the Welsh language".</p> <p>10a.7 The UDP therefore takes account of the Welsh language by using the language consideration as one influence upon the plan proposals for the settlement, housing and employment land policies across the island. The language was one of the factors used in the sustainability appraisal which supports the plan, although no precise technique was available to assess the impact of policies on the language factor.</p> <p>c) Plan Strategy</p> <p>10a.8 On Ynys Mon the position of the Welsh language is further complicated by the overall reduction in the size of the population and associated changes in the age profile. The process of population decline</p>
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		<p>affecting local communities is in itself a threat to the future well being of the Welsh language. The strategy chosen for this UDP (Part One) is to take proactive steps to stem and reverse this decline.</p> <p>10a.9 In particular the UDP strategy recognises that there is a need for a positive approach to sustainable economic development in order to create the conditions which will foster vibrant communities which are attractive to local people, reverse outward migration and encourage the retention and subsequent growth of the Welsh language within the area. People of all linguistic backgrounds can contribute to meeting this economic challenge and the Council will not discriminate on the linguistic ability of applicants for planning permission.</p> <p>10a.10 The key issues on the island in relation to planning and the language are therefore the location, scale and phasing of development. The housing and settlement strategy is generally based upon a principle of allowing a growth in housing numbers proportionate to the size of the settlement. This means no particular part of the island is planned to undergo rapid change and therefore keeping the impact on the linguistic patterns on the island to a minimum.</p> <p>10a.11 There are complex issues to be addressed in determining precisely how a single land use decision on a planning application will affect the position of the Welsh language, unless the development in question is of such a significant scale as to clearly have negative implications for the structure or use of the Welsh language. The County Council is working with other unitary authorities to see whether a methodology (or "tool kit") can be developed to address this point.</p> <p>ch) UDP Policies</p> <p>10a.12 The implementation of the Part One strategic policy 3 for the Language and Culture finds expression through a number of inter related policies and through its integration in the overall strategy of the plan. These can be described as follows :</p> <ul style="list-style-type: none"> 1) A positive approach to enabling sustainable economic development in communities across the island (Part One Policy 1 and chapter 11). 2) A settlement strategy and hierarchy which recognises that the majority of villages are allocated only a relatively small portion of development (sites for circa 5 dwellings), and in which the hamlets/clusters are regulated by only considering applications for single dwellings. The main and secondary centres are allocated a reasonable proportion of development to meet their role in the settlement hierarchy. (Part One Policy 2 and chapter 16). 3) Permitting social infrastructure projects which makes communities more attractive and therefore demographically sustainable. 4) Promoting a sustainable tourism industry (Part One Policy 7 and chapter 13). <p>The key interactions which the land use planning system can influence are those relating to :</p> <ul style="list-style-type: none"> 5) the overall scale of development taking place in communities (housing numbers and the volume/location of employment land) and, 6) the broad location of development, (settlement and employment strategy) and, 7) the delivery of affordable housing, addressing housing need in the plan area as shown by the housing needs survey and creating opportunities for young people to live locally, and
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		<p>8) maintaining an attractive physical and social fabric in local communities so the towns and villages are places where people choose to live.</p> <p><i>Further Proposed Changes (March 2003):</i> Part One Policy 3 - Language and Culture.</p> <p>PO3. The Welsh language and culture will be promoted and protected by permitting developments which help strengthen those communities where the Welsh language is part of the social fabric of the community and by refusing development that would be likely to be harmful to the Welsh Language situation in the community.</p> <p><i>Inspectors Report (August 2004)</i> <i>Numerous comments made by the Council & the Inspector, the following is an extract from the Inspectors Report:</i></p> <ul style="list-style-type: none"> 5.1 That Policy PO3 be modified by the deletion of the words 'and preventing inappropriate development' in accordance with PC20 but also with the addition of the following sentence: Development that would have a significantly harmful effect on the use of the Welsh language in a community will not be permitted. 5.2 That the deposited plan be modified by the inclusion of new Chapter 10a as set down in PC31 subject to the following amendments. 5.3 That paragraph 10a.4 in PC31 be amended by the deletion of the second sentence and the substitution of the following: Land-use planning decisions are not the only factors responsible for the health of the language in the future, as economic, educational and cultural factors also play their part. However, planning decisions can contribute beneficially to the language, and this is reflected in the plan's policies. 5.4 That paragraph 10a.6 in PC31 be deleted. 5.5 That a new paragraph be added to proposed Chapter 10a following paragraph 10a.11 as follows: In order to assess the likely impact of proposed development, other than householder or other minor proposals, on the Welsh language, applicants for planning permission will be requested to provide information on the impact of their proposal on the use of the language in the community affected. <p>4.1 That Policy PO3 of the deposited plan be modified by the deletion of the words 'and preventing inappropriate development' in response to this objection.</p>
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Merthyr Tydfil County Borough Council	Adopted Local Plan, no UDP *	<i>No Welsh language policies in Local Plan.</i>
Monmouthshire County Council	Pre-Inquiry Changes stage (Dec 2003)	<i>No Welsh language policies, however the following is contained in the introduction to the UDP:</i> The Welsh language is a component of the social fabric of communities in Wales. However, the Council does not consider that there are communities in Monmouthshire where the use of the Welsh language should be taken into account for planning purposes.

Neath Port Talbot County Council	Pre-Inquiry Changes stage (2005)	<p>Policy CS3 – Welsh Language</p> <p>Proposals which would be likely to have a significant impact on the linguistic character of a community in the Swansea, Amman and Twrch valleys will be expected to include a linguistic impact assessment and include any appropriate measures to mitigate any adverse effects.</p> <p>10.7.1 Within this area focusing on the Upper Swansea Valley the Welsh language is a significant feature of community life. When proposals might have a significant impact on the language in the community including the attraction of non-Welsh speakers through new housing, a linguistic impact assessment will be required. This should not focus exclusively on linguistic issues, but should set them in the context of other issues which the community is facing. Supplementary Planning Guidance will be prepared to assist developers.</p> <p>10.7.2 Such an assessment should identify:</p> <ul style="list-style-type: none"> • the extent that Welsh is a feature in the community; • the impacts on Welsh language schools and nursery schools and the likelihood of them being able to accommodate the impacts satisfactorily; • the likely impacts on the linguistic character of the community; • any appropriate mitigation measures; • issues in the community including whether the proposal would help sustain facilities and services which may be under threat.
Newport County Borough Council	Awaiting Inspector's Report	<i>No Welsh language policies.</i>
Pembrokeshire County Council & Pembrokeshire Coast National Park	Proposals for Change (2003 & 2004)	<p>7.6.5 Pembrokeshire is a bilingual county, with English and Welsh enjoying equal status according to government policy. According to the 2001 Census of Population, the number of Welsh speakers in Pembrokeshire as a whole was 26,367 which makes up 23.93% of the population. This figure shows a 5.6% increase in the number of Welsh speakers in the County since 1991. The incidence of Welsh speakers varies significantly from one area to another as shown in Figure 12. In the north of the County the proportion is as high as 75% in Cwm Gwaun, with Welsh being the natural medium of communication for all purposes. Communities in the south of the county, on the other hand, have quite different historical antecedents: here English is the first language for most people. For example the proportion of Welsh speakers able to speak Welsh in the Manorbier Community Council area is 4%.</p> <p>Policy 121 Welsh Language</p> <p>The Welsh language is an important component in the social, cultural and economic life of many communities within the county. Development of a nature, type or scale that is likely to prejudice the interests of the Welsh language within the community will not be permitted. Phasing may be required to allow for the gradual, natural absorption of new development in the community.</p> <p>7.6.5 Pembrokeshire is a bilingual county, with English and Welsh enjoying equal status according to</p>

		government policy. According to the 1991 Census of Population, the number of Welsh speakers in Pembrokeshire as a whole was 19,750 - 18.3% of the population as a whole. The incidence of Welsh speakers varies significantly from one area to another as shown in Figure 12. In the north of the County the proportion is as high as 75% in Cwm Gwaun, with Welsh being the natural medium of communication for all purposes. Communities in the south of the county, on the other hand, have quite different historical antecedents: here English is the first language for most people. For example the proportion of Welsh speakers able to speak Welsh in the Manorbier Community Council area is 4%. 7.6.6 Government advice on Welsh language issues is set out in Technical Advice Note 20, which states that 'the land use planning system should also take account of the needs and interests of the Welsh language and in so doing can contribute to its well-being. In a policy statement published in July 2002, the WAG advised that it is wholly committed to revitalising the Welsh Language and creating a bilingual Wales. In line with government guidance this policy seeks to recognise and protect the role of the Welsh language within those communities where the language is an important component of the social and cultural fabric. The policy will normally apply in Community and Town Council areas with over 50% Welsh speaking population, as identified in the Census. Where the Community average does not reflect the existence of concentrations of Welsh speakers within villages in the Community or Town Council areas, a more qualified and sensitive measurement will be required. The area of application, however may be subject to change, as informed by the development and publication of SPG. This policy should not be interpreted as justifying development that would not otherwise be acceptable solely on the grounds of contribution to safeguarding the Welsh language in the community. Where development can reasonably be shown, on planning grounds, (for example, the scale of development proposed) to pose a significant threat to the continued role and well being of the Welsh language within that community, the Local Planning Authority will use its powers to resist such development. The needs of communities in Pembrokeshire where the Welsh language is part of the social and cultural fabric have been considered during the formulation of the JUDP. Supplementary Planning Guidance (SPG) will be prepared, providing detailed guidance on making judgments as to whether the use of the language forms part of the social fabric of the Plan area; to measure impact of policies and proposals on the Welsh Language and to produce a Welsh Language Impact Assessment Methodology. In the interim a precautionary approach may be adopted where it is considered that a proposal would pose a significant threat to the language within a community. 7.6.7 In predominantly Welsh speaking communities significant housing land allocations have been phased to aid absorption into the community. To ensure there are employment opportunities available to sustain Welsh speaking communities specific allocations have been made in certain locations. In addition policies of the Plan provide opportunities for both new employment development in settlements more generally and in countryside locations through the reuse of buildings.
Powys County Council	Deposit Draft UDP (Oct 2004)	3.9.1 The Welsh language is an important component of the social fabric of the County. In 2001 the Welsh language was spoken by 20.8% of the population of the County. This compares with a figure of 20.5% for Wales as a whole. A high proportion of the County's Welsh speakers exists within the 3 to 15 years age

		<p>group, with 39.7% in Powys being able to speak Welsh. North and southwest Powys have the highest proportion of Welsh speakers, although strongholds of the language are also found in certain rural areas. The County Council is conscious that it has a role in sustaining and fostering the Welsh language heritage and has adopted a Welsh Language Scheme applicable to the delivery of all of its services. Accordingly, the promotion and protection of the Welsh language is considered to be an important policy issue for Powys County Council.</p> <p>3.9.2 From a land use planning perspective, it is important that future development is assessed to ensure the needs and interests of Welsh-speaking communities are sustained and not harmed, as recognised by the Welsh Assembly Government's TAN20 The Welsh Language (June 2000). Similarly, Planning Policy Wales, 2002 recognises that the Welsh language forms "part of the social and cultural fabric of Wales", and that land use planning can contribute towards its well being by developing land use strategies that take account of the impact new developments may have on the Welsh language. In developing such strategies, the Welsh Assembly Government indicates that: "...local planning authorities should consider whether they have communities where the use of the Welsh language is part of the social fabric, and where this is so it is appropriate that this be taken into account in the formulation of land use policies. (Planning Policy Wales, 2002, page 28, para 2.10.2)</p> <p>3.9.3 However, the document also highlights the importance of ensuring that policies should not seek to discriminate against individual needs on the basis of their linguistic ability and should not, for example, seek to control housing occupancy on linguistic grounds. To this end, the Council's Sustainable Strategic Settlement Hierarchy ensures that housing and other development is appropriate to the character, scale and location of the settlement. Similarly, Strategic Policy UDP SP1 Social, Community & Cultural Sustainability also recognises that development proposals need careful consideration, to ensure that new development positively contributes towards community life.</p> <p>3.9.4 Within Powys exist particular communities where the Welsh language is a significant social and community characteristic. Therefore, in keeping with Planning Policy Wales 2002, the Council has adopted a precautionary approach aimed to safeguard those communities where the Welsh language is considered to be central to the social and cultural characteristics of community life. To this end the following communities have been identified by the Council as forming part of the Welsh cultural heartland and the settlements that lie within them require special planning policy attention to safeguard their community characteristics that are founded on the Welsh language. The justification for this being that 30% or more of the resident population aged three and over speak Welsh (2001 Census).</p> <p>3.9.5 Consequently, where the Council has identified settlements where the Welsh language is judged to be an integral part of the cultural and social identity, the Council may seek legally binding arrangements to ensure that developments take account of the Welsh language and culture of these settlements. The Council considers that the key issues in relation to planning and the language are the location, scale and phasing of development. The UDP takes account of the Welsh language by using the language</p>
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Rhondda Cynon Taff County Borough Council	No published UDP *	
Snowdonia National Park	No published UDP, however, the Eryri Local Plan contains the following policy: *	<p>Safeguarding Local Identity</p> <p>2.21 Planning policies in Snowdonia must relate to the people living in the area and the ways of life of rural Welsh communities. As communities change however so do the relationships that exist within them. If the character of the area is to be safeguarded then the culture and traditions which bind them must be safeguarded and wherever possible strengthened when change occurs.</p> <p>2.22 The property boom of the late 1970's and 1980's has brought significant in-migration of a population whose ability, aptitude and desire to absorb local culture and develop a new sense of identity varies considerably. In some areas, the changing complexion of local communities has created considerable concern and tensions to the extent that further unrestricted development coupled with continued in-migration, is now seen as a threat to their traditional values and identity.</p> <p>2.23 Despite this, there is no doubt that in-migration has also brought significant benefits to the area. Increasing population numbers have helped protect and create a demand for local shops and services, retained village schools and even helped conserve redundant buildings and the built heritage of the area.</p> <p>2.24 Because of the strong local cultural and linguistic traditions prevailing in the National Park, the consequences of change and the impact on these values must be taken into account in assessing new development. Government Guidance states that the Welsh language is an important and material planning consideration in those areas of Wales where the use of the language is still widespread. Within Snowdonia, 65% of the resident population speak Welsh and the policies of this Plan must try to safeguard their local traditions and cultural values. This may mean in certain circumstances that developments will be resisted or permitted subject to certain conditions. However, the planning system is not normally concerned with ownership or who would occupy a proposed development or the language they speak. Neither Policy PC 6 nor any of the other policies in this Plan is therefore concerned with the language spoken either by applicants for planning permission, or by individual</p>

		<p>occupiers of new development. Nor will the language spoken by an applicant play any part in the decision on a planning application.</p> <p>PC 6</p> <p>In determining all planning applications the NPA will take the needs and interests of the Welsh language into account and will not permit development which, due to its scale or nature, would lead to disproportionate levels of in-migration where it can be demonstrated that this would be likely to harm the character and language balance of a predominantly Welsh speaking community.</p>
City & County of Swansea	UDP Consultation Draft (March 2003)	<i>No Welsh language policies in the consultation draft. In response to representations to date, they have agreed to a policy in the Deposit Plan.</i>
Torfaen County Borough Council	No UDP - issues paper published (2000). *	<i>No mention of the Welsh language.</i>
Vale of Glamorgan Council	Adopted UDP (2005)	<i>No Welsh language policies</i>

Wrexham County Borough Council	Adopted UDP (Feb 2005)	<p>Policy GDP1 All new development should:-</p> <ul style="list-style-type: none"> a) Ensure that built development in its scale, design and layout, and in its use of materials and landscaping, accords with the character of the site and makes a positive contribution to the appearance of the nearby locality. b) Take account of personal and community safety and security in the design and layout of development and public / private spaces. c) Make the best use of design techniques, siting and orientation in order to conserve energy and water resources. d) Ensure safe and convenient pedestrian and vehicular access to and from development sites, both on site and in the nearby locality. e) Ensure that built development is located where it has convenient access to public transport facilities, and is well related to pedestrian and cycle routes wherever possible. f) Ensure the safety and amenity of the public and safeguard the environment from the adverse effects of pollution of water, land or air, hazards from industry and quarrying, and associated noise, odour or vibration arising from development. g) Secure public services (e.g. gas, water, electricity) to development at minimum public cost. h) Safeguard sites and areas of nature conservation and wildlife interest, and to provide new habitats where there is an unavoidable loss of existing habitats and areas of wildlife interest. i) Ensure that development does not result in, or is subject to, flooding, soil erosion, landslides or contamination, either on or off the site. j) Have regard to the need to safeguard those areas that possess a strong Welsh cultural and/or linguistic identity from development that could harm this identity. k) Secure the development of sustainable communities, through the promotion of the economic, social and environmental well-being of the area. <p>4.3 The unique character of parts of the County Borough is derived from its Welsh culture and landscape. The Welsh language is an important part of the daily lives of many local inhabitants and a key determinant of the social fabric of the communities of, for example, the Ceiriog Valley, Rhos/Johnstown, Penycae, Coedpoeth and Minera. The safeguarding and nurturing of this cultural and linguistic identity cannot occur in isolation from the development of the local economy and conservation of the landscape.</p>
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* These Authorities have ceased preparation of their Unitary Development Plans.

+ Text in Italics are the Author's comments.

June 2005

PLANNING APPEAL CASE EXAMPLES

1. Very few appeals exist where the Welsh Language and culture is used as a reason for refusing planning permission. In 2004 a search of appeal cases revealed only 27 appeal decisions in the past 18 years where the Welsh language was a material consideration.

Successful Cases

2. One of the earliest examples dates back to 1986 when the former Glyndwr District Council refused planning permission for the development of 1.5 ha of land for residential development in the small village of Llanrhaeadr (North Wales). The reason for refusal referred to the detrimental effect on the character of the village (note: no specific mention of language). The inspector referred to the evidence represented regarding the "Welshness" of the village and concluded that it would not be justified in refusing the appeal solely on grounds that the dwellings would be occupied by non-Welsh speakers alone. He nevertheless gave this matter significant weight.

The appeal was dismissed.

3. In 1990 Ynys Môn (Isle of Anglesey) Borough Council refused planning permission for 59 dwellings on land in Llangoed because along with other reasons the development would harm the character of the dwelling (Note; again no reference to language). The developer appealed. The Council working in partnership with the Llangoed Protection Society presented evidence to support the case that the Welshness of the village was an essential component of its character. In 1991 the inspector following a public inquiry concluded:

"The Llangoed Protection Society produced evidence to show the growth in the village over recent years and the reducing proportion of Welsh speaking residents. In their view a new estate of 59 houses would be too rapid a development for the indigenous Welsh Community to hope to keep their way of life and language in a healthy state. Whilst I am satisfied that the physical services could accommodate development on this scale I share the concern of the local residents on the ability of the community to absorb continued increases of development on a relatively large scale".

The appeal was dismissed.

4. In 1990 Aberconwy Borough Council refused planning permission for residential development in the village of Eglwysbach. The developer appealed and the inspector concluded:

"Whether implementation of this proposal would also significantly harm the Welsh language and culture in the village is unclear but there is certainly a serious risk that it would. However active in local affairs residents in the appeal site houses might become, if they were to include, as in line with other recent development they probably would, a high percentage of non-Welsh speaking people from outside the area, the social, linguistic and cultural balance of the community would be adversely affected. The enlarged Eglwysbach of today whose original Welshness has been heavily diluted by recent increases in its non-indigenous population has in my opinion little if any residual capacity to absorb any further influx of such persons without disturbing and thereby damaging the balance".

The appeal was dismissed

Unsuccessful Cases

5. In 1990 Gwynedd County Council refused permission for residential development in the village of Bryncrug because along with other reasons the development would affect the character of the local community. The developer appealed. The Inspector accepted the evidence presented by the Council that in 1981 20% of the houses in the village were second homes and although 64% of the population spoke Welsh only 14 out of the 41 children in the local school were able to speak Welsh. The Council contended that granting the permission for new housing above that needed for local need would exacerbate the difficulty of perpetuating the use of the Welsh Language. The inspector however concluded:

"....decisions must be based on planning grounds and be reasonable. I do not regard 15 outstanding planning permissions in a village the size of Bryncrug to be overwhelming evidence that there is no local need orthat these houses would become second homes"

The appeal was allowed

6. In 1992 the Snowdonia National Park Authority refused planning permission for residential development in Bala because with other reasons the effect on the Welsh language and culture. The developer appealed. The inspector concluded:

"To me the important question is what effect your client's particular proposal would have on the manifestly Welsh character of Bala. The Authority argued

that the Welsh language would be harmed if the proposed dwellings were sold on the open market. It was their view that if the dwellings were reserved for local people, then their occupants would be more likely to speak Welsh. However, they were unable to produce evidence to support their contention and said that there is no means of knowing what the effect of selling the dwellings on the open market would be on the number of Welsh speakers in Bala. I am therefore not convinced that the proposed dwellings would be likely to be bought by people who do not speak Welsh rather than people who do nor that the proposal would damage the Welsh language or culture”

The appeal was allowed.

7. In 1996 the former Montgomeryshire District council refused planning permission for 6 new houses in the village of Meifod. The developer appealed. The Council had initially agreed to grant permission subject to the developer entering into a legal agreement (Section 106) to restrict occupation of 50% of the dwellings i.e. a) Welsh speakers, b) those who had a child who had attended a Welsh medium school for a period of the previous 12 months, or c) other first time buyers satisfying criteria to established local need. The Council sought to justify the decision by referring to emerging policy and that in 1991 41% of the population spoke Welsh. The inspector concluded:

“I accept that the needs and interests of the Welsh language are a material consideration in this case....Planning controls are concerned with the use of land rather than the identity of the user....the question of who is to occupy premises for which permission is to be granted will normally be irrelevant....The effect of Council policy to create a restricted market for the sale of a proportion of all new dwellings to a limited group of persons which could result in the properties changing hands at prices below those likely to be obtained in open competition...would be seen to be inequitable and could be socially divisive”

The appeal was allowed. Furthermore the inspector ordered the Council to pay the costs of the appellant because:

“The Council argued that it was impossible to say precisely what impact would result from the construction of 6 dwellings (and thus)..... they failed ...to identify, either statistically, or by way of reasoning, any risk to the Welsh language or culture which would result from allowing this appeal”

8. In 1995 Neath Borough Council failed to make a decision and an application for planning permission for residential development on land in Crynant. The Council had previously allocated the land for housing purposes and granted planning permission for residential development. The main issue in the

appeal was whether the conditions suggested by the Council were appropriate. Condition 12 sought to delay development from commencing or any dwelling from being occupied for a specified period in order to mitigate the social effect on the small community, in particular, to avoid small communities being overwhelmed by a too rapid expansion of their population with the risk of adverse effects on the proportion of Welsh speaking people. The Inspector commented:

"Although one of the head teachers consulted by the Council thought that Crynant would not be able to absorb the perceived 'influx of newcomers, neither the other head teacher who was consulted nor the County Director of Education foresaw any particular problems in these respects. I note that another development 'for 20 dwellings in the village has been approved and it has been indicated that the appeal site might accommodate some 30 or more dwellings. If such quantity of new housing were to be provided in a short time-scale, I feel that the impact upon a community of this size could create some social problems. However, the Council have only suggested that occupation of the appeal development should wait until two years from the date of any planning permission, which would now be the Autumn of 1997".

The appeal was allowed.

9. In 2005 Gwynedd Council refused advertisement consent for the display of four internally illuminated box signs. The Council's reasons for refusing consent were primarily that the signs' text, being mono-lingual, English only, was contrary to Strategic Policy 5 of the Gwynedd Structure Plan and contrary to advice in Planning Policy Wales and Technical Advice Note 20 and would therefore affect the amenity and cultural character of the area.

The Inspector concluded:

"..... in the case of Advertisement appeals, Section 54A of the Town and Country Planning Act 1990 does not apply I have carefully considered..... whether on this occasion the nature and monolingual text of the appeal signs would have a harmful effect on the linguistic and cultural characteristics of the area around the store including its wider amenity I noted..... that while some of the shop/office signage (in the locality) was in bilingual form, most was monolingual. English only. the existing cultural character of much of the centre of Bangor is mono-lingual, English only the erection of these four signs would not unduly harm the existing linguistic character of the area of the store site and its surroundings and would not therefore harm the wider amenity of the area."

The appeal by Marks & Spencer was allowed.

10. What conclusions can we draw from these appeal decisions?
 - a) the Welsh language is not used as a sole reason for refusal
 - b) all appeals, except for the advert appeal in Bangor in 2005, relate to the impact of new housing
 - c) language is often linked to impact on the character of the community
 - d) the magnitude of impact is important in relation to the size of the village/community
 - e) local planning authorities must present clear and compelling land use evidence to support their case
 - f) appeals can be successfully defended provided there is community backing and research is carried out into past patterns of change and occupation of new houses in the community

MITIGATION MEASURES

EXAMPLES OF POSSIBLE MITIGATION MEASURES

Housing

- Phasing the number of houses to be built
- Provision of affordable housing for local needs
- Agreements to provide for people on the local housing register

Employment (all types including retail)

- Local labour contracts
- Support for local skills training initiatives
- Provision of bilingual signs within and outside the establishment

Education

- Support and funding for language induction and staff language lessons e.g. language plans and immersion units
- Support and funding for cultural and language initiatives/projects to encourage the use of the language within communities.
- Support for the provision of school places in the local Welsh medium school
- Support and funding for language and cultural awareness initiatives

IMPORTANT NOTE

1. A number of the mitigation measures likely to be sought will be governed by Government Guidance on Planning Obligations, others may be more appropriate as conditions or unilateral undertakings. In view of the impending changes to guidance on Planning Obligations any work carried out at this stage would need to be revised in light of changes. It may well be that more possibilities will be created by the new guidance.
2. At present any mitigation measures which require the use of a planning obligation will be guided by advice that their use should be necessary, relevant to planning, directly related to the proposed development, fairly and reasonably related in scale and kind to the proposed development and reasonable in all other respects.
3. It will be imperative that what is sought has a direct relationship with the planning permission.

4. It will also be necessary for there to be evidence that the development would have an adverse effect on the Welsh Language.
5. Any facilities sought will only be acceptable where such facilities are directly related to the development proposal, the need for them arises from its implementation and they are related in scale and kind.
6. It will be important to ensure that what is being asked for is reasonable and doesn't make development unviable.
7. Above all any requirement that involves a planning obligation will have to be negotiated with the developer and not required.

PARTICIPATING ORGANISATIONS:

AWDURDOD / AUTHORITY

- Welsh Assembly Government / Llywodraeth Cynulliad Cymru
- Bwrdd Yr Iaith Gymraeg / Welsh Language Board
- Cyngor Sir Ddinbych / Denbighshire County Council
- Cyngor Sir Ynys Môn / Isle of Anglesey County Council
- Cyngor Sir Gwynedd / Gwynedd Council
- Cyngor Bwrdeistref Sirol Conwy / Conwy County Borough Council
- Cyngor Sir Y Fflint / Flintshire County Council
- Cyngor Bwrdeistref Sirol Wrecsam / Wrexham County Borough
- Cyngor Sir Ceredigion / Ceredigion County Council
- Cyngor Sir Powys / Powys County Council
- Cyngor Sir Caerfyrddin / Carmarthenshire County Council
- Cyngor Castell Nedd Port Talbot / Neath Port Talbot Council
- Cyngor Merthyr Tydfil / Merthyr Tydfil Council
- Parc Cenedlaethol Eryri / Snowdonia National Park
- Parc Cenedlaethol Arfordir Benfro / Pembrokeshire Coast National Park
- Cyngor Sir Fynwy / Monmouthshire County Council
- City and Council of Swansea / Dinas a Sir Abertawe
- Cyngor Bwrdeistref Sirol Rhondda Cynon Taf County Borough Council

STEERING GROUP MEMBERSHIP:

Aneurin Phillips, Chairman	Snowdonia National Park Authority
Jonathan Cawley, Secretary	Denbighshire County Council
Owain Lewis	Neath Port Talbot County Borough Council
Bethan Lovering	Carmarthenshire County Council
Siobhan Wiltshire / Lesley Punter	Welsh Assembly Government
Aled Davies / Cara Jones	Gwynedd Council
Lynda Healey	Home Builders Federation
Rhys Dafis until 2004 / Gwenith Price and Dyfan Sion 2004 onwards	Welsh Language Board

PLANNING SUB-GROUP MEMBERSHIP:

Iwan Evans, Chairman	Gwynedd Council
Rhys Davies	Independent Planning Consultant
Tim Ball	Ceredigion County Council
Martin Eaglestone	Isle of Anglesey County Council
Aled Davies	Gwynedd Council
Eifion Bowen	Carmarthenshire County Council



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14 DEC 2009

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BS1 6PN

Your ref: EN010007/Preapp
Our ref: NEO/2617/RP/Anglesey/20
Enquiries: Rebecca Parfitt
Direct Line: (01443) 331307

FAO: J I Williams

9th December 2009

Dear Sir

Re: Land adjacent to Wylfa Nuclear Power Station, Porposal by Horizon Nuclear Power Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 SI 2263 Regulations 8 & 9

We refer to your correspondence received at this office on 24th November 2009 regarding the above site.

We would like to thank you for giving us the opportunity to comment on the above proposed development and would welcome any further opportunities to comment.

In order to assess the situation in depth we would require further information during the EIA stage, this should include:

- Information regarding the original Wylfa site i.e. water supply (raw/potable), and the supplier (DCWW/private).
- Information regarding the potential impact of potable water supply and possible licence abstraction limitations.
- Information on the potential impact on sewerage network.
- Information on the potential impact on the Waste Water Treatment Works (WWTW), i.e. if the development requires a trade effluent consent, and/or possible pre-treatment requirements or whether the development is to utilise a private WWTW.
- Information on proposed asset protection (we have various assets that may be affected by the development).

Once this information is received we will be in a better position to comment further.

glas
Glas Cymru Cyfngedig

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Mae Dŵr Cymru yn eiddo i Glas Cymru - cwmni hlder elw

We welcome correspondence in Welsh and English
Rydym yn croesawu gohebiaeth yn y Gymraeg neu yn Saesneg

NDC working with Dŵr Cymru in providing the planning and development functions.

Dŵr Cymru Cyf, a limited company registered in Wales no. 2366777, Registered office: Pentwyn Road, Nelson, Treharris, Mid Glamorgan CF46 6LY

NDC yn cydweithio a Dŵr Cymru ar ran waith cynllunio a datblygu.

Dŵr Cymru Cyf, cwmni cyfngedig wedi gofrestu yng Nghymru rhif 2366777, Swyddfa gofrestredig: Heol Pentwyn, Nelson, Treharris, Morgannwg Caerdydd CF46 6LY

We hope the attached is satisfactory; however, should you require further assistance, please contact us.

Yours faithfully

A handwritten signature consisting of stylized initials 'R' and 'C' followed by a full name.

Rhidian Clement
Planning Team Leader