

LATE SCOPING CONSULTATION RESPONSES

Consultation bodies have 28 days to respond with any comments, stating either the information that they consider should be included in the ES or that they do not have any comments.

Any responses received after the deadline will not be considered within the scoping opinion but are forwarded to the applicant for consideration in accordance with the policy set out in Advice Note 7: Environmental Impact Assessment, Screening and Scoping.

The following EIA scoping consultation responses were received after the consultation deadline specified under legislation and therefore did not form part of the Secretary of State's scoping opinion.



Bwrdd Iechyd Prifysgol
Betsi Cadwaladr
University Health Board

Carlton Court,
St Asaph, LL17 0JD

Carlton Court,
Llanelwy LL17 0JD

PINS RECEIVED

25 APR 2016

F.A.O Hannah Pratt
Senior EIA and Land Rights Advisor
The Planning Inspectorate
3/18 Eagle Wing
Temple Quay House
2 The Square
Bristol
BS1 6PN

Ein cyf / Our ref: AJ/SI/APR
Eich cyf / Your ref: 160321 EN010007
3756884

Ffôn: 01745 586399

Ffacs / Fax:

Dyddiad / Date: 20th April 2016

Dear Hannah

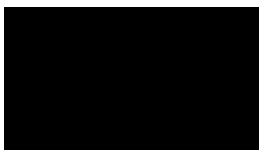
Re: Scoping Consultation
Application for an Order Granting Development Consent for the Wylfa Newydd Project

The above development is located within the Betsi Cadwalader University Health Board (BCUHB) area.

We are aware that you have consulted with Public Health England (PHE) as we are advised by them on these matters in conjunction with Public Health Wales. We have reviewed the response issued by PHE and concur with their observations.

In order to ensure you receive a consistent public health response moving forward with this application, please regard BCUHB as an interested party and register for us to receive relevant consultations in the future.

Yours sincerely



Andrew Jones
Cyfarwyddwr Gweithredol Iechyd Cyhoeddus / Executive Director of Public Health

Cyfeiriad Gohebiaeth ar gyfer y Cadeirydd a'r Prif Weithredwr / Correspondence address for Chairman and Chief Executive:
Swyddfa'r Gweithredwyr / Executives' Office,

Ysbyty Gwynedd, Penrhosgarnedd
Bangor, Gwynedd LL57 2PW

Gwefan: www.pbc.cymru.nhs.uk / **Web:** www.bcu.wales.nhs.uk

From: Steve.Newman@onr.gsi.gov.uk [mailto:Steve.Newman@onr.gsi.gov.uk]
Sent: 28 April 2016 10:55
To: Environmental Services
Cc: ONR.Land.Use.Planning@onr.gsi.gov.uk
Subject: FW: EN010007 - Wylfa Newydd Nuclear Power Station - EIA Scoping Notification and Consultation

FAO Hannah Pratt

Dear Hannah,

Please accept my apologies for the delay in responding to your email.

ONR does not advise against this development.

Please note my address below for all requests relating to nuclear sites regulated by ONR. Please use the ONR.Land.Use.Planning@onr.gsi.gov.uk account for all emails.

Kind regards

Steve



**Office for
Nuclear Regulation**

**Steve Newman LLM, BSc (Hons)
Para-Technical Officer – Emergency Preparedness & Response**

**T: 0151 951 4282 | E: steve.newman@onr.gsi.gov.uk
4N.G, Desk 22 – Redgrave Court, Merton Road, Bootle, L20 7HS**

From: Dave MHPD Adams [mailto:Dave.MHPD.Adams@hse.gsi.gov.uk] **On Behalf Of** NSIP Applications
Sent: 22 March 2016 08:50
To: Environmental Services; ONR Land Use Planning
Cc: Steve Newman
Subject: RE: EN010007 - Wylfa Newydd Nuclear Power Station - EIA Scoping Notification and Consultation

Dear PINs,

HSE does not deal with Nuclear Sites, as these are dealt with by ONR (Office for Nuclear Regulation).

Kind regards,

Dave Adams

Dave.MHPD.Adams

**Land Use Planning Policy, Major Hazards Policy Division, Hazardous Installations Directorate,
Health and Safety Executive.**

Desk 76, 2.2, Redgrave Court, Merton Road, Bootle, Merseyside L20 7HS

0151 951 3408 dave.mhpd.adams@hse.gsi.gov.uk



[2]

HSE is engaging with stakeholders to shape a new strategy for occupational safety and health in Great Britain [Find out more](#)^[3] and join the conversation #HelpGBWorkWell

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

From: Environmental Services [<mailto:environmentalservices@pins.gsi.gov.uk>]

Sent: 21 March 2016 16:24

To: NSIP Applications

Subject: EN010007 - Wylfa Newydd Nuclear Power Station - EIA Scoping Notification and Consultation

Dear Sir/Madam

Please see the following hyperlink to correspondence on the proposed Wylfa Newydd Nuclear Power Station Project.

http://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2016/03/160321_EN010007_Letter-to-stat-cons_Scoping-AND-Reg-9-Notification_English-AND-Welsh.pdf

Please note the deadline for consultation responses is 18 April 2016, and is a statutory requirement that cannot be extended.

Kind regards,

Hannah Pratt
Senior EIA and Lands Rights Advisor

Major Applications and Plans, The Planning Inspectorate, Temple Quay House,
Temple Quay, Bristol, BS1 6PN

Direct Line: 0303 444 5001

Twitter: [@PINSgov](https://twitter.com/PINSgov)

Helpline: 0303 444 5000

Email: EnvironmentalServices@pins.gsi.gov.uk

Web: <http://infrastructure.planninginspectorate.gov.uk> (National Infrastructure
Planning website)

This communication does not constitute legal advice.

Please view our [Information Charter](#) before sending information to the Planning
Inspectorate.



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ISLE OF ANGLESEY COUNTY COUNCIL
Swyddfa'r Sir
LLANGEFNI
Ynys Môn - Anglesey
LL77 7TW

Gofynnwch am - Please ask for:
E Gwyndaf Jones

☎ (01248) 752403 📠 (01248) 752430

E-Bost-E-mail: EGwyndaf.Jones@ynysmon.gov.uk

Ein Cyf - Our Ref. 38C310B/SCO/CONS
Eich Cyf - Your Ref.

6th May 2016

Dear Horizon Nuclear Power Wylfa Limited,

Application by Horizon Nuclear Power for an order granting Development Consent for the Wylfa Newydd Generating Station.

Addendum to IACC Response to Scoping Request

The County Council welcomed the opportunity, as a relevant authority, to respond to the information contained within Horizon Nuclear Power's (the applicant's) scoping report. The County Council submitted the formal response to the Secretary of State via e-mail on Monday 18th April 2016.

Under the topic heading 'Surface Water and Groundwater' it was noted that the County Council had a number of detailed comments on the profile of the existing environment and that these comments may be provided under a separate cover.

For your information please find attached further detailed comments as outlined in section 8.7.1.2 Surface Water and Groundwater – Existing Environment. These comments have also been sent direct to the Secretary of State.

Yours sincerely

E Gwyndaf Jones
Prif Swyddog Cynllunio / Chief Planning Officer



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Additional comments to IACC's Response to Scoping Request: Horizon Nuclear Power Wylfa Newydd

April 2016



ioacc



@angleseycouncil



www.ynysmon.gov.uk
www.anglesey.gov.uk

Document Version

No.	Details	Date
1	Draft report	18 April 2016
2	Final report	20 April 2016

Further comments:

Section 7.3 – Approach to EIA:

- Water Framework Directive assessment should feature here. The WFD is multi-disciplinary and as such does not fit into one EIA chapter. The applicant provides no indication of the plan for assessment of WFD.

-

General points that apply throughout Chapter 14:

- The lack of reference/signposting to chapter figures.
- Lack of receptor identification. The chapter figure titles indicate that various receptors are shown, but there is no description of how these have been identified. Further, the chapter does not give any indication of receptor value/sensitivity criteria nor magnitude of change criteria. The council considers these to be fundamental requirements of an EIA scoping report for a DCO development.
- There is no reference to consultation. The council should have the ability to shape the approach to EIA, WFD assessment and FCA, in conjunction with NRW. The Flood and Water Management Act 2010 identified Isle of Anglesey County Council as the Lead Local Flood Authority for the district. IoACC are responsible for taking the lead in managing flood risk from local sources. This includes surface water, groundwater and ordinary watercourses and also where there is an interaction between these sources and main rivers or the sea. The council is also the regulatory body for Land Drainage Consents (under the Land Drainage Act (1991)) that will be required as part of the project.

14 Surface Water and Groundwater Chapter

14.2.2:

- EA and NRW have been separate bodies since April 2013, so the reference to the EA WiYBY data and descriptions is inappropriate. The applicant needs to engage with NRW for the most up to date baseline data.
- The applicant needs to refer to the overall status of WFD water bodies, not just the individual elements
- The applicant should use the updated 2015 Wester Wales River Basin Management Plan. Draft Cycle 2 RBMP data have been available for since 2014, so the 2009 RBMP data are out of date.
- The council notes that ‘water body unit’ is incorrect terminology. What is being referred to here is a WFD water body.
- More information is required on the issue of past mining on Anglesey, and the implications for groundwater water quality. The applicant should be more specific as this forms an important consideration for the EIA water environment baseline.
- The Study Area is referenced in this section, but without reference/signposting to a section that describes how it has been identified.
- The applicant should be more precise with regard to baseline water quality. What standards are being referred to?

14.2.3:

- The council considers that the applicant's reference to small coastal catchments is insufficient. The applicant should be more specific. Where exactly are they? What is their importance?
- Table 14.1 shows water bodies that are not consistent with the 2015 RBMP baseline. However, the source of the information is not referenced.
- The applicant must use up to date RBMP data at PEI stage, and reference the up to date RBMP and the NRW water watch facility for collation of data.
- Table 14.1 attempts to describe WFD status. However, status is more than just ecological status/potential. The applicant should give, at least, the accompanying WFD chemical status and the overall resulting WFD status.
- The applicant refers to water quality information collected to date, but there is no indication as to what this refers to.
- EQS is referred to in the text but is not explained. The applicant should assess how all references to the EQS Directive have changed as a result of the 2015 WFD Directions.
- The reference to the CAMS is confusing. The council considers that if referring to Welsh names (e.g. Ynys Mon CAMS), it should also give the English translation, as the CAMS in question is listed as the Anglesey CAMS on NRW's website.
- The applicant's reference to the CAMS should note that the area around the proposed development has not actually been assessed. There is, therefore, no CAMS for the area which drains to the proposed development.
- Given that the reference to water quality is likely to be from the 2009 RBMP (although this is not confirmed), it is likely that the description provided by the applicant is out of date and is not a reflection of the actual baseline.

14.2.4:

- The applicant refers to river channel adjustments, but should be more specific so that the reader can understand what type of adjustments are being referred to.
- The applicant should note that increased levels of river energy do not necessarily lead to lateral channel adjustment.
- Receptor sensitivity seems to be referred to as receptor 'value'. If this is adopted throughout the Scoping report then this is fine, but it would benefit from signposting to the earlier report sections that explain the rationale for this terminology.
- The applicant refers to a 1km radius study area, but it is not clear why this distance has been chosen. As such the council cannot provide a view on the appropriateness of the study area.
- Water body GB110102059150 is incorrectly named. It is actually an unnamed water body. At EIA stage, the applicant will need to use correct and consistent terms in respect of WFD and the RBMP. The water body in question is not classified under the 2015 Cycle 2 RBMP.

14.2.5:

- The statement that the area surrounding the proposed development is considered to be at little-no risk of flooding is incorrect. There are areas of Development Zone C2 all around the project area. The applicant should give a clearer description; a quick look at the TAN 15 map contradicts the statement in the scoping report.
- The council believes that the applicant should include a figure to show the flood zones within and adjacent to the proposed development.

Figure 14.2:

- The figure does not show WFD water bodies (or even the 'blue line'). Rather it appears to show the detailed river network. WFD catchment boundaries should be given, and a clearer description in the text that all watercourses within these catchments are part of the WFD water body. However, the council notes that the up to date RBMP now does not include many of the water bodies around the proposed development, as these are now 'non-reportable water bodies'.

14.2.6:

- The applicant should at least refer to whether areas of flood risk are hydrologically connected to the proposed development.
- As a general flood risk point, it would be appropriate to refer to NRW Flood Zones 2 and 3, not just TAN15. This would give the reader a better context for the flood risk associated with the project.
- Is the list of flood risk areas in any ranking / order? Without reference to figures this passage of text is confusing. There is also no level of risk associated with each of these areas – something that reference to NRW flood zones 2 and 3 would have allowed.
- Details are not provided to support the climate change scenarios applied in the applicants modelling of flood risk. For example, 13.3m elevation (AOD?) of maximum flood extent is only 70cm from the general infrastructure level of 14m (AOD?) cited in the report. The council wishes to be satisfied that appropriate climate change scenarios have been applied before providing comment.

14.3:

- The applicants list of potential effects is difficult to follow, and would benefit from being broken down by construction, operation and decommissioning phases. If the effects are the same regardless of the project phase, or some are more heavily weighted to one phase (e.g. construction), then the applicant should describe this.
- The council assumes that the potential effects listed are 'worst case'. However, the applicant goes on to describe the mitigation and good practice measures that would be implemented to reduce any potential effects. This commentary on mitigation should come first, then a list of the resultant potential effects should be given, assuming the required level of mitigation is provided.
- Is the list of potential effects exhaustive or a professional judgement of likely effects given the type of project? The applicant should provide this description.
- The council assumes that the reference to 'mounds' is in respect of stockpiled material e.g. from earthworks.
- 'Derogation' of water quality is technically incorrect. The council assumes that the applicant is referring to a deterioration in water quality.
- The lowering of groundwater level should be listed as a separate potential effect.
- The applicant's reference to best practice working methods could benefit from more precision. It is also unclear whether these will be part of the Environment Management Plan.
- The list of potential effects would be much clearer if it could be broken down into different receptor categories.
- The applicant refers to the fact that there will be no significant decline in WFD status. The council considers that such a statement cannot be made without some form of WFD strategy to provide details of how WFD will be approached. This level of information should be

outlined at EIA Scoping. At EIA stage, the applicant will need to outline their approach to WFD and only when the assessment has been undertaken can such a conclusion be provided.

14.4:

- Many of the requirements of NPS-EN1 and –EN6 provided in this section by the applicant have very little linkage to this chapter.

14.4.1:

- The council would expect to be able to comment on the applicant's methodology for identification of the surface water study area
- The catchment adjacent to (east of) Cameas is very close to the development area (less than 250m). The council considers that the identification of the applicants study area should employ some kind of buffer to account for changes in location/design as the EIA progresses. Therefore, the council questions whether this catchment should not be included in the surface water study area, even if just as a precaution.
- The applicant has provided no indication of methodology for defining surface water catchments.
- The council would ask the applicant how confident they are that there is no hydrological pathway to other adjacent catchments. Again, further justification on surface water study area is needed.
- Are there no resources receptors in the surface water study area e.g. surface water abstractions?
- Areas within the surface water study area on Figure 14.1 should not be unshaded. All areas should be named for cross-referencing in the text.
- The council cannot agree to the surface water study area until further description of the methodology used to identify it is provided.
- The council believes that the groundwater study area appears to be logical. However, the method of identification is opaque. It should refer to groundwater flow patterns for example, and then justify why the study area is appropriate based on the evidence available.
- There are no private water supplies shown on Figure 14.3. Is this an omission?

14.4.2:

- The council believes that the text on significance of effects is not appropriate. Significance of effects is based on value (of a receptor) and the magnitude of the impact/change on the receptor.
- Significance of effects should include criteria for value or magnitude.
- It is unclear why the groundwater assessment doesn't consider groundwater water quality.
- In respect of the fluvial geomorphology assessment, it is unclear why the bed and banks of the river systems are the only features being assessed. The council believes that the assessment should include impacts on their floodplains.
- There appears to be no attempt to indicate that the designated site receptors (although they are not actually identified as receptors) should only form part of the assessment if they are dependent on freshwater from surface or groundwater flows. Furthermore, there is no signposting to other chapters within the Scoping report (e.g. ecology, marine), that would presumably assess impacts on the conservation objectives of these sites.

14.4.3:

- There is no table/matrix provided to demonstrate how significant effects will be evaluated. If the intention is to follow Figure 7.2 on p63 then this should be signposted.
- The indication is that Negligible is the only effect that will require no mitigation.
- Are all Minor effects significant?
- Flood risk effects of Low are referred to in the penultimate chapter paragraph. However, according to the description given on p142 there is no category for a Low potential effect.



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