



Wylfa Newydd Project

6.10.1 ES Volume J - Environmental commitments and summary of residual effects J1 - Environmental commitments

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Planning Act 2008

Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

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1 Environmental commitments

1.1 Introduction

- 1.1.1 This chapter summarises Horizon's commitments to provide the mitigation for potential environmental effects identified in all volumes and topic-specific chapters within this Environmental Statement.
- 1.1.2 Appendix J1-1 (schedule of environment commitments) (Application Reference Number: 6.10.3) to this chapter contains a schedule of environmental commitments, providing a line-by-line account of all mitigation relied upon in this Environmental Statement.
- 1.1.3 As set out in chapter B1 (introduction to the assessment process) (Application Reference Number: 6.2.1), the term 'mitigation' describes measures used to prevent or reduce adverse environmental effects. The three types of mitigation considered in the Wylfa Newydd Project Environmental Impact Assessment (EIA) are described below.
- 'Embedded mitigation' measures are measures that avoid or reduce environmental effects that are directly incorporated into the design of the development.
 - 'Good practice mitigation' measures are measures that would occur with or without input from EIA feeding into the design process (for example, mitigation that represents established industry practice or would be undertaken to meet existing legal compliance).
 - 'Additional mitigation' measures are measures that have been identified through the EIA or other assessment processes to further reduce environmental effects.
- 1.1.4 This approach accords with the Institute of Environmental Management and Assessment guidance [RD1], which describes 'primary' (embedded) mitigation, 'secondary' (additional) mitigation and 'tertiary' (good practice) mitigation.
- 1.1.5 Appendix J1-1 (Application Reference Number: 6.10.3) sets out how the mitigation reported in this Environmental Statement would be secured as commitments during the consenting process and delivery of the Wylfa Newydd Project.

1.2 Mitigation framework

- 1.2.1 The delivery of Horizon's mitigation will be controlled through 'Development Consent Order (DCO) requirements' which:
- identify various parameters within which certain works can be located and constructed (e.g. maximum and minimum building dimensions, locational zones, or platform levels);
 - require construction and operation to be undertaken in accordance with 'control documents'; and

- control identified issues or works (e.g. time limits around commencement of the Wylfa Newydd Project).
- 1.2.2 A DCO would authorise the Wylfa Newydd Project to be constructed with reference to a series of work packages contained within Schedule 1 of the Draft Development Consent Order (Application Reference Number: 3.1). The work packages describe the Wylfa Newydd Project along with plans contained within Schedule 2 of the Draft Development Consent Order (Application Reference Number: 3.1). The work packages and plans illustrate the scope of Horizon's powers and rights under the DCO.
- 1.2.3 Requirements listed in Schedule 3 of the Draft Development Consent Order (Application Reference Number: 3.1) also relate to control documents which provide securing mechanisms to ensure the mitigation commitments are delivered.
- 1.2.4 Control documents supporting the Draft Development Consent Order (Application Reference Number: 3.1) are detailed below.
- The Construction Method Statement (CMS) (Application Reference Number: 6.4.17) sets out the construction methodologies, works, and machinery required for construction works across the Wylfa Newydd Development Area. The methodologies identified in the CMS (Application Reference Number: 6.4.17) have been used for the basis of assessment reported in the Environmental Statement. The construction works across the Wylfa Newydd Development Area would be undertaken in general accordance with the CMS (Application Reference Number: 6.4.17).
 - The Phasing Strategy (Application Reference Number: 8.29) identifies when key mitigation (such as the Site Campus and Park and Ride facility) would be constructed. Construction of the Wylfa Newydd Project would be in accordance with the Phasing Strategy (Application Reference Number: 8.29).
 - The Wylfa Newydd Code of Construction Practice (CoCP) (Application Reference Number: 8.6) and the related site specific sub-CoCPs (Application Reference Number: 8.7 to 8.12) set out general and topic-specific requirements, standards and measures in accordance with mitigation described in this Environmental Statement. Site specific sub-CoCPs are:
 - Main Power Station Site sub-CoCP (Application Reference Number: 8.7);
 - Marine Works sub-CoCP (Application Reference Number: 8.8);
 - Off-Site Power Station Facilities sub-CoCP (Application Reference Number: 8.9);
 - Park and Ride sub-CoCP (Application Reference Number: 8.10);
 - Logistics Centre sub-CoCP (Application Reference Number: 8.11);
 - and

- A5025 Off-line Highway Improvements sub-CoCP (Application Reference Number: 8.12).

These sub-CoCPs set out specific controls relevant to elements of the Wylfa Newydd Project not covered in detail by the project-wide controls contained in the Wylfa Newydd CoCP (Application Reference Number: 8.6). The CoCPs are divided into management strategies, each of which contains specific mitigation measures to control environmental effects relating to a particular topic area (e.g. dust and air quality management, noise and vibration). The CoCP and sub-CoCPs would be certified documents, the compliance of which would be secured through DCO requirements.

- The Wylfa Newydd Code of Operational Practice (CoOP) (Application Reference Number: 8.13) sets out controls that would apply during the operation of the permanent elements of the Wylfa Newydd Project. The CoOP (Application Reference Number: 8.13) would be a certified document, the compliance of which would be secured through DCO requirements.
- The Landscape and Habitat Management Strategy (LHMS) (Application reference Number: 8.16) sets out how key landscape elements and habitats within the Wylfa Newydd Development Area would be created and managed in order to mitigate mainly landscape and ecological effects identified in the Environmental Statement.
- The Design and Access Statement (DAS) (Application Reference Number: 8.2.1, 8.2.2 and 8.2.3) sets out the design principles that would guide how Horizon constructs the authorised development, and illustrative design concepts which demonstrate how the Wylfa Newydd Project could be brought forward in accordance with those principles. The DAS is divided into three volumes:
 - Design and Access Statement - Volume 1 - Project-wide (Application Reference Number: 8.2.1);
 - Design and Access Statement - Volume 2 - Power Station Site (Application Reference Number: 8.2.2); and
 - Design and Access Statement - Volume 3 - Associated Developments and Off-Site Power Station Facilities (Application Reference Number: 8.2.3).

For the Power Station Site, the DAS (Application Reference Number: 8.2.1, 8.2.2 and 8.2.3) sets out the building design, and landscape principles that inform the LHMS (Application Reference Number: 8.16). For all other works, the relevant DAS volume (Application Reference Number: 8.2.1, 8.2.2 and 8.2.3) contains landscape and building design principles. The DAS (Application Reference Number: 8.2.1, 8.2.2 and 8.2.3) would be certified and secured through a DCO requirement.

- The Workforce Management Strategy (WMS) (Application Reference Number: 8.5) sets out the principles that Horizon and its appointed

representatives and contractors would follow to manage and control the construction workforce. Horizon would be required to develop a Code of Conduct in accordance with the principles set out in the WMS (Application Reference Number: 8.5) for the management of workforce conduct, as well as specific protocols for those residing at the Site Campus. Workers would then be required to comply with the resulting Code of Conduct through their labour agreements. The WMS (Application Reference Number: 8.5) will be a certified document and will be secured through a DCO requirement.

- 1.2.5 Along with the work packages and plans, control documents set the framework within which the Wylfa Newydd Project would be implemented. Commitments would also be delivered by obligations set by Section 106 agreements submitted as the Draft Heads of Terms for Planning Obligations (Application Reference Number: 3.4), and non-statutory community benefit agreements.
- 1.2.6 Figure J1-1 illustrates the framework of controls and the delivery of mitigation across the Wylfa Newydd Project.

1.3 Delivery documents

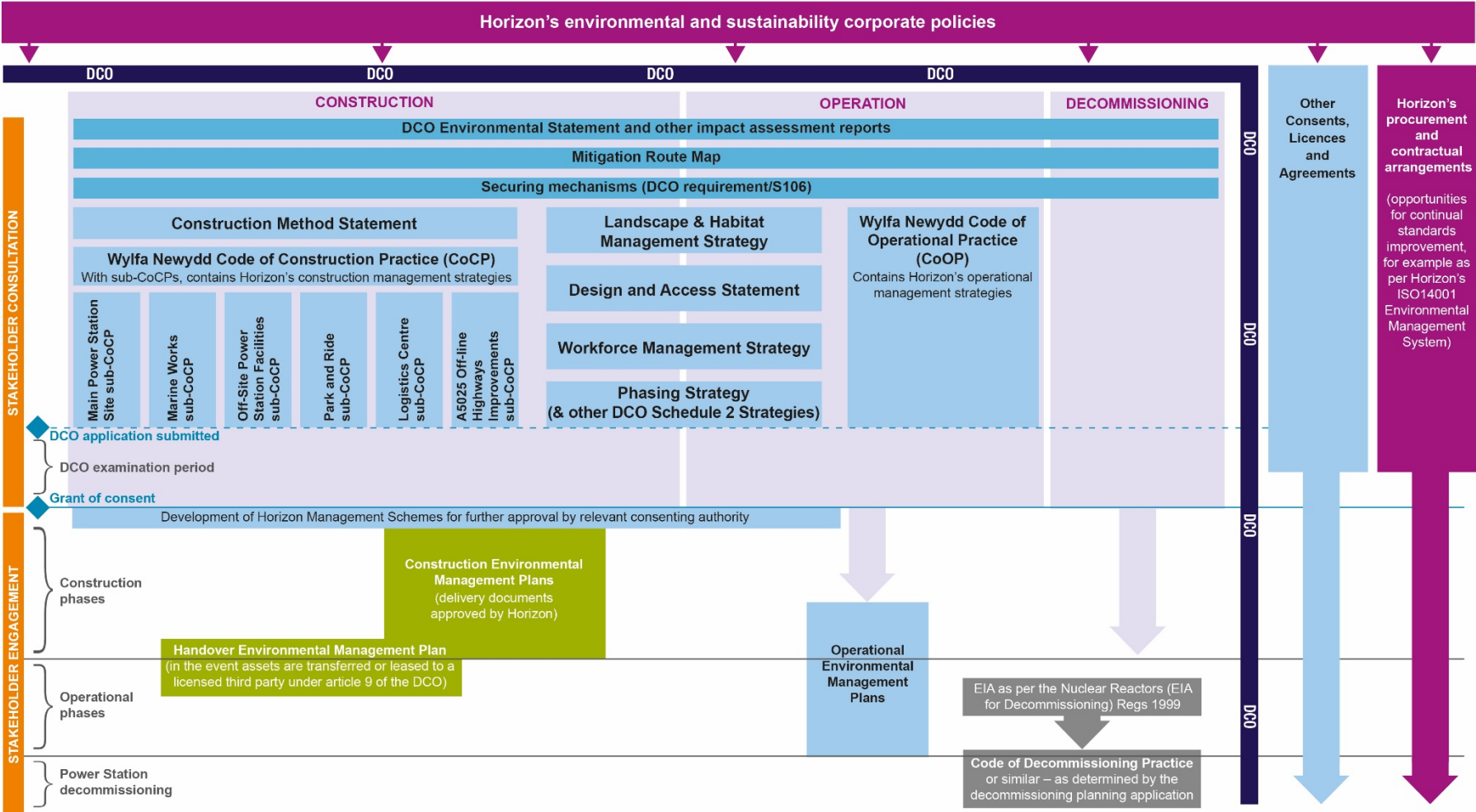
- 1.3.1 In addition to the control documents setting out the framework of commitments at the grant of consent, Horizon will employ a series of delivery documents during the life of the Wylfa Newydd Project. These delivery documents do not form part of the Draft Development Consent Order (Application Reference Number: 3.1). Key delivery documents for environmental mitigation include.
 - Construction Environmental Management Plan. The Construction Environmental Management Plan is a delivery document that would detail how the practical execution of the construction works would be planned, managed and controlled to meet the requirements of the Wylfa Newydd CoCP (Application Reference Number: 8.6) and relevant sub-CoCPs (Application Reference Number: 8.7 to 8.12), as well as Order requirements and protective provisions, Section 106 obligations, other necessary consents, legislation and common good practices.
 - Handover Environmental Management Plan. A Handover Environmental Management Plan would be developed during the construction phase in the event that an asset might be transferred to a third party. The Handover Environmental Management Plan would provide relevant information to the third party receiving an asset on existing and future environmental commitments and objectives to be honoured, and ongoing actions and risks to be managed.
 - Operational Environmental Management Plan. The Operational Environmental Management Plan would detail how the operation of the Power Station would be planned, managed and controlled to meet the requirements of the Wylfa Newydd CoOP (Application Reference Number: 8.13).

- A Code of Decommissioning Practice, or similar, would be subject to a further EIA and planning approval as per the Nuclear Reactors (EIA for Decommissioning) Regulations 1999, and is represented as such on figure J1-1.

1.4 Mitigation Route Map

- 1.4.1 Appendix J1-1 (Application Reference Number: 6.10.3) to this chapter contains a schedule of environmental commitments. Mitigation has been identified within the chapters of this Environmental Statement as embedded, good practice or additional so as to help describe the EIA process and how residual effects have been identified. Beyond this Environmental Statement, mitigation requirements simply become commitments and would no longer be labelled as embedded, good practice or additional mitigation.
- 1.4.2 The schedule of environmental commitments will feed into the Wylfa Newydd Mitigation Route Map (Application Reference Number: 8.14). The Mitigation Route Map (Application Reference Number: 8.14) will also summarise how mitigation reported across the other impact assessments (e.g. the Shadow Habitats Regulations Assessment Report, Application Reference Number: 5.2; Health Impact Assessment Report, Application Reference Number: 8.19; and Welsh Language Impact Assessment, Application reference Number: 8.21) would also be delivered.
- 1.4.3 The Mitigation Route Map (Application Reference Number: 8.14) is not intended to be a control document in Horizon's application for development consent. It is intended to be a navigational tool to help readers understand the mitigation relied on across the application for development consent, and how it would be secured. It provides an audit trail of the key measures which the Environmental Statement and other assessment documents rely on to avoid, reduce and offset significant adverse effects of the Wylfa Newydd Project.
- 1.4.4 It is expected that the Mitigation Route Map (Application Reference Number: 8.14) would become a live document to be updated throughout the DCO examination process. However, the schedule of environmental commitments appended to this Environmental Statement is not intended to change, and will remain fixed as a record of the state of the EIA at the time of application for development consent.

Figure J1-1 Approach to environmental management on the Wylfa Newydd Project



1.5 References

Table J1-1 Schedule of references

ID	Reference
RD1	Institute of Environmental Management and Assessment. 2015. <i>IEMA Environmental Impact Assessment Guide To: Shaping Quality Development</i> . [Online]. [Accessed: 3 August 2017]. Available from: http://www.iema.net/assets/uploads/iema_guidance_documents_eia_guide_to_shaping_quality_development_v7.pdf

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