



Wylfa Newydd Project

8.13 Wylfa Newydd Code of Operational Practice

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Executive Summary

This CoOP covers the operational phase of the permanent elements of the Wylfa Newydd Project, i.e. the elements that will remain after the construction of the Power Station is complete.

The CoOP sets out Horizon's commitments to mitigating the environmental effects upon people, businesses and the natural and historical environment of the Wylfa Newydd Project during its operational phase. The document covers:

the Power Station, including the permanent Power Station main plant, common plant, and supporting facilities, buildings, structures and features, Grid Connection, together with its permanent landscape setting, car parks and access routes within the Wylfa Newydd Development Area;

- the Marine Works, comprising the Cooling Water System, intake and outfall, breakwaters and the Marine Off-Loading Facility (MOLF), within the Wylfa Newydd Development Area;
- the Off-Site Power Station Facilities, which comprise the Alternative Emergency Control Centre (AECC), Mobile Emergency Equipment Garage (MEEG) and Environmental Survey Laboratory (ESL).

Although this CoOP covers the environmental management requirements for the operational phase, it does not replicate the separate requirements of the Nuclear Site Licence or the site's Environmental Permit(s).

1 Introduction

1.1 General

- 1.1.1 This Wylfa Newydd Code of Operational Practice (CoOP) forms part of the application for a Development Consent Order (DCO) for the Wylfa Newydd Project. It sets out general and topic-specific environmental controls that will be adhered to during the operation of the Wylfa Newydd Power Station, in accordance with the mitigation described in the Environmental Statement and other application documents, to demonstrate the effective planning, management and control of the Power Station.
- 1.1.2 It is intended that this CoOP will be the subject matter of DCO Requirements and will become a 'certified' document.
- 1.1.3 This CoOP supports the planning and delivery of the Wylfa Newydd Project in a sustainable, efficient and cost-effective a manner as possible. It describes Horizon Nuclear Power Wylfa Ltd. (hereby known as Horizon) commitments to mitigating the environmental effects upon people, businesses and the natural and historical environment of the Wylfa Newydd Project during its operational phase.
- 1.1.4 This CoOP covers the operational phase of the permanent elements of the Wylfa Newydd Project, i.e. the elements that will remain after the construction of the Power Station is complete. These are:
- the Power Station, including the permanent Power Station main plant, common plant, and supporting facilities, buildings, structures and features, Grid Connection, together with its permanent landscape setting, car parks and access routes within the Wylfa Newydd Development Area;
 - the Marine Works, comprising the Cooling Water System, intake and outfall, breakwaters and the Marine Off-Loading Facility (MOLF), within the Wylfa Newydd Development Area;
 - the Off-Site Power Station Facilities, which comprise the Alternative Emergency Control Centre (AECC), Mobile Emergency Equipment Garage (MEEG) and Environmental Survey Laboratory (ESL); and
- 1.1.5 Although this CoOP covers the environmental management requirements for the operational phase, it does not replicate the separate requirements of the Nuclear Site Licence or the site's Environmental Permit(s) (see section 2).
- 1.1.6 This CoOP does not cover the following.
- The Park and Ride facility at Dalar Hir, which will be decommissioned after construction of the Power Station. The site will be restored and maintained by Horizon for a defined period until responsibility of managing the area is taken over by the land-owner in accordance with a Handover Environmental Management Plan agreed with the Isle of Anglesey County Council (IACC). The operational environmental

management arrangements for the Park and Ride facility are within the scope of the Park & Ride sub-CoCP.

- The Logistics Centre at Parc Cybi, which will be partly decommissioned after construction of the Power Station, suitable for some future use of the site. The operational environmental management arrangements for the Logistics Centre are within the scope of the Logistics Centre sub-CoCP.
- The A5025 Off-line Highway Improvements, which will be in place before the Power Station is operational. Site landscape maintenance associated with the A5025 Highway Improvements will be subject to a Handover Environmental Management Plan, to be agreed with the IACC. The IACC will act as the Local Highway Authority responsible for the management of the road after its construction.
- The decommissioning of the Power Station, which will be subject to separate requirements.

1.1.7 This CoOP sets out the project-wide and site-specific controls to be complied with, covering the following aspects of the Wylfa Newydd Project during operation of the Power Station:

- communications and community and stakeholder liaison;
- general site operations;
- traffic and transport;
- public access management;
- air quality management;
- noise and vibration management;
- geological conservation;
- surface water and groundwater management;
- terrestrial and freshwater ecology;
- landscape and visual;
- cultural heritage;
- coastal processes and marine environment; and
- waste management.

1.2 Responsibilities

1.2.1 Horizon is the responsible party for the delivery of the Wylfa Newydd Project, in whom the powers of the DCO would be vested. Horizon is responsible for all operational aspects, which include overseeing and assuring the activities carried out by their contractors, and the coordination between contractors.

2 Approach to environmental management

2.1 Introduction

- 2.1.1 Figure 2-1 outlines the overall approach to environmental management across the Wylfa Newydd Project. The following sections provide further detail to the various elements of the approach.

2.2 Environmental Impact Assessment

- 2.2.1 In preparation for the DCO application, an Environmental Impact Assessment (EIA) was undertaken for the Wylfa Newydd Project and an Environmental Statement prepared in accordance with the *Infrastructure Planning (Environmental Impact Assessment) Regulations 2009* and the *Marine Works (Environmental Impact Assessment) Regulations 2007*.
- 2.2.2 Other 'stand-alone' assessments (such as a Welsh Language Impact Assessment (Application Reference Number: 8.21), Health Impact Assessment (Application Reference Number: 8.19), Shadow Habitats Regulations Assessment Report (Application Reference Number: 5.2), Water Framework Directive Compliance Assessment (Application Reference Number 8.26) and Equality Impact Assessment (Application Reference Number 8.22)) were also carried out as part of the planning of the Wylfa Newydd Project.
- 2.2.3 The Environmental Statement and stand-alone assessments have informed relevant sections of this CoOP where appropriate. Through the above assessments, mitigation which was identified with respect to operational environmental effects has been integral to developing this CoOP.

Mitigation

- 2.2.4 The term 'mitigation' describes committed measures used to prevent or reduce the potential adverse effects of a development project on the environment. Three types of mitigation were considered for the Wylfa Newydd Project, as described below.
- 'Embedded mitigation' includes all those measures to avoid or reduce environmental effects that are directly incorporated into the design of the development.
 - 'Good practice mitigation' contains 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.
- 2.2.5 This approach takes on board Institute of Environmental Management and Assessment guidance [RD1], which describes 'primary' (embedded)

mitigation, 'secondary' (additional) mitigation and 'tertiary' (good practice) mitigation.

- 2.2.6 Embedded mitigation integral to the Wylfa Newydd Project is secured through the design principles set out in the Design and Access Statements, Volume 1, 2 and 3 (Application Reference Numbers: 8.2.1, 8.2.2, 8.2.3 respectively) and the landscape and habitat principles set out in the Landscape and Habitat Management Strategy (LHMS) (Application Reference Number 8.16), in respect of the Wylfa Newydd Development Area.
- 2.2.7 Good practice and additional mitigation relevant to the operational phase is contained within the management strategies of this CoOP.
- 2.2.8 During the Operating phase arrangements will be documented in the operating model which will ensure compliance with site license conditions, permits, and nuclear standards (e.g. SQEP). Behaviours of personnel will also be contained in these arrangements when developed closer to the operating phase.
- 2.2.9 Commitments from other assessments (such as the Health Impact Assessment (Application Reference Number: 8.19)), and strategies that are not 'control' documents (such as the Jobs and Skills Strategy (Application Reference Number: 8.3) provide information for the DCO application. However, these are secured through planning obligations.
- 2.2.10 Due to the need for further operational arrangements to be made before the commencement of operation, in line with the requirements of the Nuclear Site Licence and Environmental Permit(s) (see below), relevant Operational Environmental Management Schemes for the management of specific issues will be further developed (see figure 2-1) in accordance with the principles set out in this CoOP. Such schemes will be submitted to and approved by an appointed consenting authority in advance of the commencement of operation.
- 2.2.11 All mitigation measures across the Wylfa Newydd Project are described within a Mitigation Route Map (Application Reference Number: 8.14) accompanying the application for development consent, including their source reference and how delivery will be secured.
- 2.2.12 Where relevant, this CoOP refers out to other certified application documents and management strategies as referred to above and in figure 2-1 for the relevant mitigation controls.

2.3 Code of Operational Practice

- 2.3.1 As this CoOP is based upon the Environmental Statement and other assessments, the content of this CoOP has been prepared with cognisance of Pre-Application Consultations with stakeholders and the local community, as well as ongoing focus groups with key stakeholders such as the IACC and Natural Resources Wales (NRW) during the development of the DCO application.

- 2.3.2 This CoOP contains sufficient detail to demonstrate that the mitigation described in the Environmental Statement and other assessments can be secured.
- 2.3.3 Horizon is open to further refinement of this CoOP and other management strategies through the examination process, in response to comments from the Examining Authority and other parties. At the close of the DCO examination period, this CoOP will be secured as approved documents as described in Figure 2-1.

2.4 Nuclear Site Licence

- 2.4.1 A Nuclear Site Licence will be required under the Nuclear Installations Act 1965 to install and operate the Power Station.
- 2.4.2 The Nuclear Site Licence will place Horizon under the auspices of the Office for Nuclear Regulation where it will oversee Horizon's control of the safety of the Power Station. This includes operational management, including the storage of radioactive waste and emergency management.
- 2.4.3 This CoOP does not replicate the likely requirements of the Nuclear Site Licence. Horizon will operate the Power Station in full compliance with the requirements of the Nuclear Site Licence.

2.5 Environmental Permits

- 2.5.1 The Environmental Permitting (England and Wales) Regulations 2016 require Environmental Permits to be obtained for the operation of the Power Station.
- 2.5.2 The Environmental Permit(s), issued by NRW, will set limits for and control the main emissions and discharges from the Power Station. This is a separate consenting process to the DCO.
- 2.5.3 This CoOP does not replicate the likely requirements of the Environmental Permit(s). Horizon will operate the Power Station in full compliance with the requirements of the Environmental Permit(s).

2.6 Environmental management system

- 2.6.1 Horizon will operate the Wylfa Newydd Project under management systems accredited to British Standard (BS) EN ISO 14001: 2015 [RD2].
- 2.6.2 Horizon will be compliant with and maintain ISO 14001 accreditation throughout the operation of the Wylfa Newydd Project. Accreditation will be periodically audited by accredited external bodies in line with ISO 14001 procedures.

2.7 Enforcement

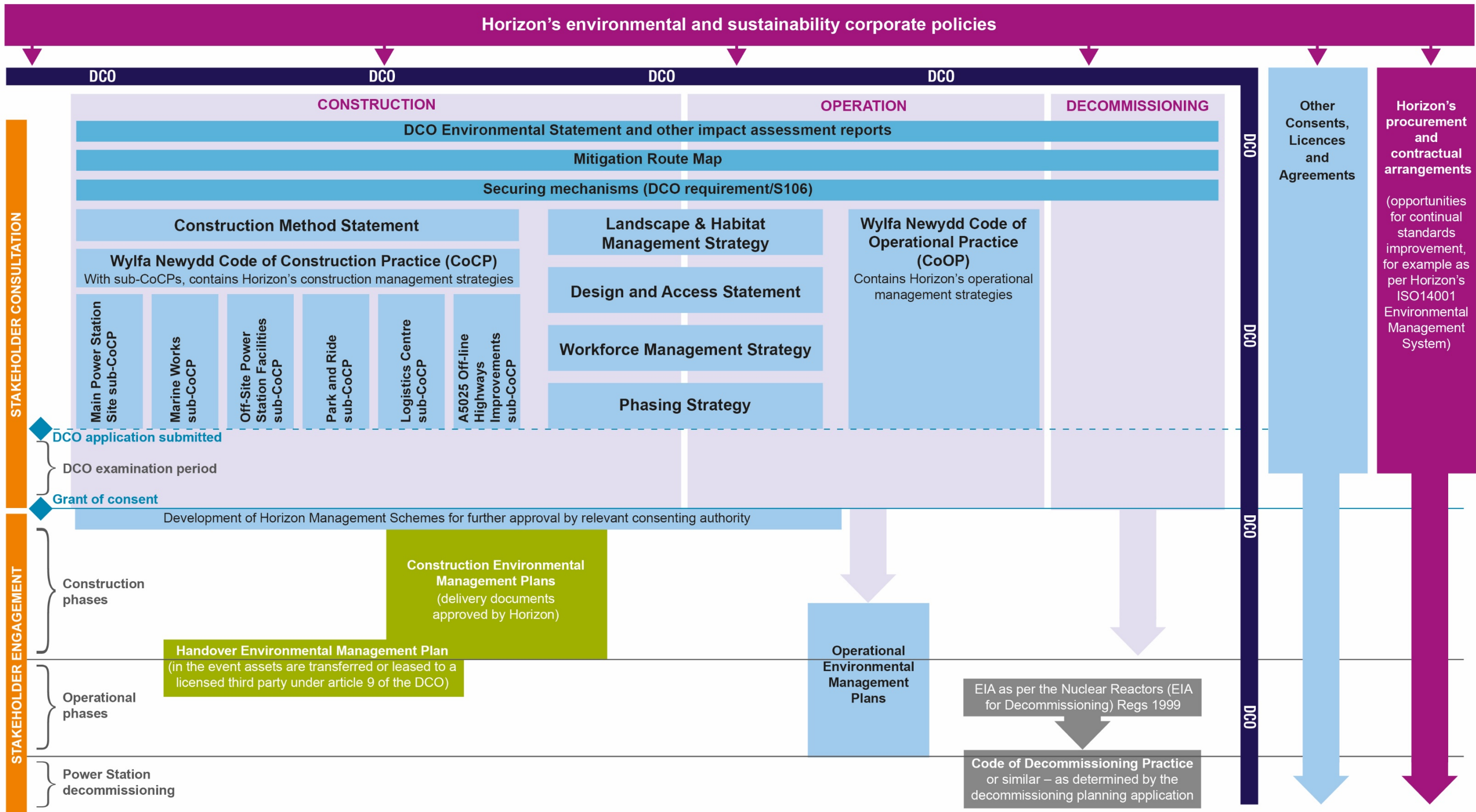
- 2.7.1 This Wylfa Newydd CoOP is a certified document and approved as part of the draft DCO. Under the requirements in Schedule 3 of the Draft DCO, the operation of the Wylfa Newydd Project (as described in Schedule 1 of the Draft DCO) must be carried out in accordance with the Wylfa Newydd CoOP, unless otherwise agreed by the IACC. As noted above, the inclusion of "unless

otherwise agreed by the IACC” enables revisions to this document, provided the proposed revision(s) are unlikely to give rise to any materially new or different environmental effects from those assessed in the Environmental Statement.

- 2.7.2 Breach of terms of a DCO is an offence under the Act and therefore, non-compliance with any of the Requirements in Schedule 3, including the requirement to comply with the Wylfa Newydd CoOP, will expose Horizon to potential enforcement action under the Act.

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Figure 2-1 Approach to environmental management on the Wylfa Newydd Project



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3 Communications and community/stakeholder liaison

3.1 Community and stakeholder liaison

Community Involvement Officers

- 3.1.1 Horizon will have a bilingual Community Involvement Officer role within the Wylfa Newydd Communications Team. During operation of the Power Station, the responsibilities will include:
- being a key interface between the local community, key stakeholders and Horizon management;
 - promoting local employment, and local education, upskilling and training opportunities;
 - being an interface for support to local young people from disadvantaged backgrounds, particularly those with an interest in science, technology, engineering and mathematics (STEM) subjects;
 - promoting health and well-being in the local community; and
 - disseminating information about operational safety.
- 3.1.2 Horizon will coordinate a series of regular communication meetings with key stakeholders including local communities.
- 3.1.3 The purpose is to exchange information and dialogue between Horizon and the local community during operation:
- continuing and enhancing local community relationships between Horizon, key stakeholders and the wider community;
 - providing a conduit for the dissemination of information to, and input from, community members and other key stakeholders;
 - identifying and commenting on concerns raised by the community, with suggested action that could be undertaken to alleviate these concerns; and
 - discussion of operational issues and providing suggestions for mitigating the local effects.
- 3.1.4 Horizon will identify and further consult with groups who represent people with characteristics protected under the Equality Act 2010 in order to determine whether there are any additional issues which may require reasonable adjustments to be made.

3.2 Welsh language and culture

- 3.2.1 Horizon will consider the Welsh language requirements for each job at the Wylfa Newydd Power Station, and what Welsh language skills are required as part of the recruitment process. Horizon will advertise posts through recruitment channels that target a Welsh-speaking audience specifically as part of broader recruitment strategies. This will include a Wylfa Newydd Employment & Skills Service as well other partners that engage with a Welsh-speaking audience.
- 3.2.2 Horizon will distribute information on the Welsh language and culture as part of recruitment materials. This will include a general statement on the value Horizon places on Welsh language skills, the level of skills required for a post as well as background information on the Welsh language. Permanent and temporary public signs relating to the project will be bilingual.
- 3.2.3 Horizon will provide language awareness training to all operational staff to demonstrate linguistic courtesy and awareness of Horizon's Welsh language policy. Horizon will also develop a programme of Welsh language training at different levels for Horizon Wylfa Newydd staff where this is a relevant requirement within a post. Horizon will establish a Welsh language mentoring scheme for learners. Horizon will maintain the Welsh speaker 'badge' scheme.
- 3.2.4 Horizon will develop and circulate welcome packs to all families of Wylfa Newydd workers who move to the area. These will draw on information in the Welsh Government's planned Welcome Packs. The welcome packs are likely to include information on local services, schools, welsh language and culture amongst other relevant information.
- 3.2.5 Horizon will set up a management group to have oversight of/be accountable for the delivery of Welsh language and culture mitigation strategies contained within this CoOP. Furthermore, Horizon will establish and chair an external stakeholder group (Welsh Language and Culture Coordinator) to monitor the implementation of these strategies and provide advice on Welsh language and culture mitigation delivery.

3.3 Enquiries and complaints

- 3.3.1 Horizon will maintain a system for dealing with enquiries or complaints across the Wylfa Newydd Project, staffed by bilingual Welsh-and English-speaking personnel.
- 3.3.2 A complaints register will be maintained by Horizon. All calls will be logged and mapped, together with a record of the responses and action taken. The system will ensure that appropriate action is taken and within a reasonable timescale.

4 General site operations

4.1 Introduction

4.1.1 The following infrastructure is covered by this CoOP:

- Power Station: the proposed new nuclear Power Station, including two UK Advanced Boiling Water Reactors to be supplied by Hitachi-GE Nuclear Energy Ltd., supporting facilities, buildings, plant and structures.
- Other on-site development, including landscape works and planting, drainage, surface water management systems, public access works including permanent closures and diversions of Public Rights of Way (PRoWs), the new Power Station Access Road and internal site roads, car parking.
- Marine Works, comprising a Cooling Water System intake and outfall, MOLF and breakwater structures.
- Off-Site Power Station Facilities, comprising the AECC, ESL and MEEG.

4.2 Environmental emergency management

4.2.1 Horizon will identify potential environmental emergencies throughout the operational phase of the Power Station. Horizon will put in place a procedure for managing and responding to those identified potential emergencies. Horizon will periodically test the emergency management and response procedures to ensure they are effective and that any learning can be identified to continually improve the procedures.

4.3 Lighting

4.3.1 Lighting will be provided on the Wylfa Newydd Development Area primarily to ensure safe working conditions and to maintain security during operation. Lighting control measures will be incorporated into the lighting design and operation. This will limit visual intrusiveness to occupied residential properties, limit light spill to surrounding areas (including the Isle of Anglesey Area of Outstanding Natural Beauty and Heritage Coast) and sensitive wildlife, and recognises Anglesey's aim of achieving international Dark Skies status, while maintaining safe and secure light levels on the Wylfa Newydd Development Area.

4.3.2 Appropriate good practice lighting control measures will be identified, giving consideration to BS EN 12464-2:2014 Light and lighting – Lighting of work places. Part 2: Outdoor work places [RD3] and the Institute of Lighting Engineers' Guidance Notes for the Reduction of Obtrusive Light GN01:2011 [RD4].

4.4 Operational training exercises and drills at the Off-Site Power Station Facilities

- 4.4.1 Prior to operation of the Off-Site Power Station Facilities, Horizon will notify occupiers of nearby properties and Llanfaethlu Primary School in relation to the safe nature of regulated activities at these facilities and regulatory requirements Horizon must follow in operating the facilities. Community information sheets will be circulated at least two weeks before operation of the facility commences. Information should also be disseminated to people in Llanfaethlu to provide reassurance in relation to the nature of regulated testing activities at these facilities and the safety of such activities in relation to adjacent dwellings and the new primary school.
- 4.4.2 Horizon will, where feasible, schedule training exercises / drills at the Off-Site Power Station Facilities to avoid peak drop-off and pick-up times at Llanfaethlu Primary School. This will reduce the potential for any reduction in road safety at time when young people are most active on the road network.
- 4.4.3 Prior to training exercises / drills at the Off-Site Power Station Facilities, Horizon will notify occupiers of nearby properties and Llanfaethlu Primary School in advance. The nature and timing of training exercises / drills at the Off-Site Power Station Facilities could be widely publicised (particularly in Llanfaethlu and at the new primary school) to avoid adverse effects on community well-being from uncertainty about whether the increase in activity at the site is training or emergency-related.

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5 Traffic and transport strategies

5.1 General

- 5.1.1 The EIA process has identified that, during the operation of the Wylfa Newydd Project, the potential effects on traffic and transport can be managed through the application of operational strategies for delivery and servicing, and for staff travel.
- 5.1.2 During the operational phase of the Wylfa Newydd Project, the A5025 Off-line Highway Improvements would be in place.
- 5.1.3 The operational strategy for delivery and servicing is set out in section 5.2 below. The Operational Travel Strategy for staff travel to site is set out in section 5.3.

5.2 Operational delivery and servicing and maintenance strategy

- 5.2.1 This section sets out the delivery and servicing and maintenance strategy for the operation of the Wylfa Newydd Project, which Horizon will operate, with the aim of ensuring that servicing and delivery practices work efficiently and disruption to the local highway network and site operations are reduced. It does not consider the transport of nuclear material/waste and any outage requirements. In accordance with the Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009, Horizon will use robust transport containers to transport radioactive materials and waste associated with its operations.

Road freight

- 5.2.2 The majority of deliveries to the Wylfa Newydd Power Station by heavy goods vehicles are expected between 07:00 and 19:00 during weekdays only. The majority of operational deliveries are likely to be made by smaller rigid type vehicles, i.e. medium and light goods vehicles.
- 5.2.3 In line with the measures set out in the Operational Travel Strategy set out in section 5.3, Heavy Goods Vehicles travelling to and from the site will be required to travel via the A5025 to the south (i.e. via Valley), as per the construction stage, and use the A5025 Off-line Highway Improvements, unless a particular supplier is located to the east along the A5025 (between the Power Station Site and A5025 at A55 Junction 8) or other extenuating circumstances prevail.
- 5.2.4 Heavy goods vehicles will prioritise the A5025 to the south (i.e. via Valley), avoiding minor roads unless extenuating circumstances arise.

Sea freight

- 5.2.5 The MOLF employed during the construction stage of the development will be made available to be used for the transportation of bulk components if required during the operational stage.

Delivery management

- 5.2.6 In order to ensure that deliveries are managed according to the capacity of the loading facilities available at the Power Station, a delivery booking system will be implemented.

Monitoring and review

- 5.2.7 Servicing and maintenance activities will be regularly reviewed by Horizon with a view to continually improve efficiency, and as a result reducing the impact of servicing and maintenance activities on the transport network.

5.3 Operational Travel Strategy

- 5.3.1 This section sets out Horizon's Operational Travel Strategy for the Wylfa Newydd Project, which aims to encourage operational staff and visitors to travel to the site by sustainable modes, in order to mitigate the anticipated increase in motor traffic created by the development on the local road network.
- 5.3.2 Sustainable modes of travel are defined as:
- walking;
 - cycling;
 - public transport; and
 - car sharing.
- 5.3.3 The Operational Travel Strategy will reduce the environmental effects of operational traffic by encouraging and promoting car sharing, bus services, cycle parking and key walking routes, including through the measures outlined below.

Travel Plan Coordinator

- 5.3.4 All measures to encourage sustainable travel will be promoted by a Travel Plan Coordinator (TPC) for the Power Station during the operational phase. The TPC will be suitably trained and qualified for the role.
- 5.3.5 The TPC is key to the success of the Operational Travel Strategy and will represent the main driving force behind the travel plan. The key responsibilities of the TPC will be as follows:
- lead, actively promote and publicise the Operational Travel Strategy;
 - ensure that information on sustainable travel opportunities is provided (and regularly updated);
 - ensure information on the Operational Travel Strategy is easily available (by a variety of platforms);
 - ensure the Operational Travel Strategy becomes part of the site management policy and its aims and information is broadcast via other associated literature;
 - be a point of contact for information and resolve any transport-related problems;

- develop new initiatives, implement and manage the Operational Travel Strategy and disseminate information to staff at regular intervals;
- develop and launch a staff travel survey to inform future Operational Travel Strategy development; and
- ensure that the objectives and targets under the strategy are set up and being met.

Marketing and communication

- 5.3.6 Sustainable travel information outlining the travel options to the site, links to the car share database and other websites displaying key information, will be part of the induction materials provided to staff.

Parking management

- 5.3.7 All members of staff will be required to pre-register any vehicle parking on-site, and no unauthorised vehicles will be allowed to park on-site.
- 5.3.8 Electric vehicle charging points will be provided in the main staff car park, compatible with others across Anglesey and north Wales. The number and type of charging points will be determined prior to the site becoming operational in line with prevailing technology and uptake at the time.

Smarter choices

- 5.3.9 'Smarter choices' measures consider ways of mitigating the effects of travel associated with the Power Station site or, in some cases, removing the need to travel. The 'smarter choices' measures identified for the operational site are identified below.
- 5.3.10 Staff will be encouraged to use Traveline Cymru to plan their most efficient travel route(s). If this service is not available, the TPC will look at alternative systems. New members of staff joining the Power Station workforce post-opening will be similarly encouraged to use these systems.
- 5.3.11 Canteen facilities will be provided on-site to reduce the need for trips during working hours.
- 5.3.12 Methods and facilities (such as video conferencing) will be provided and promoted as a method of holding meetings rather than travelling.
- 5.3.13 Where appropriate, staff will be provided with suitable equipment to enable flexible working, for example working from home and away from the office.

Car sharing

- 5.3.14 Parking spaces on-site for car sharers will be prioritised, and a suitable number of car share spaces will be available.
- 5.3.15 Horizon will promote car sharing and lift sharing between employees using internal media, for example, the intranet or a mobile app. Car sharing will also be promoted using other appropriate methods, which if required, could include a suitable car share website or a web-based platform which may use

information from the Construction Workers' Accommodation Management Portal.

- 5.3.16 This will allow potential car sharers to be matched so that workers travelling from a similar area by car can share their journey. The car sharing strategy will be promoted, monitored and managed and enforced by Horizon through its supply chain. Workers will be recommended via appropriate channels, to car share with others to reduce the number of journeys being made, in particular across the Britannia Bridge.

Public transport

- 5.3.17 Horizon will promote and encourage the use of public transport by staff.
- 5.3.18 Horizon will work with the IACC and local public transport operators to provide adequate local bus services to and from the Power Station in response to demand at the time.

Cycling and walking

- 5.3.19 Horizon will promote and encourage cycling and walking to work. Relevant information will be provided to staff as part of induction materials provided upon the commencement of employment.
- 5.3.20 On-site cycle facilities will be provided and maintained for members of staff and visitors including cycle parking, changing facilities with showers and lockers, and areas where wet clothes can be dried.
- 5.3.21 If still available when the site becomes operational, Horizon will sign up to the UK Government's Cycle to Work scheme, which enables employees to purchase a bicycle and ancillary equipment through their employer, providing tax benefits. If the Cycle to Work scheme has been discontinued, the TPC will look at alternative options available.
- 5.3.22 Safe walking routes to the site connected to the local network will be maintained throughout operation of the Power Station.

Professional visitors

- 5.3.23 The operational Power Station will have a variety of visitors, including professionals (e.g. attending meetings or assisting with the operation of the site).
- 5.3.24 Horizon will make available, e.g. via its website, information on how to travel to and from the Power Station to assist professional visitors to plan their travel routes including by use of public transport.

Monitoring and review

- 5.3.25 A review of the Operational Travel Strategy will be undertaken with the IACC and Welsh Government on a regular basis by the Travel Plan Coordinator. Appropriate monitoring will be discussed and agreed.

6 Public access management strategy

6.1 General

6.1.1 During the operational phase of the Power Station, Horizon will regularly inspect and maintain the public access infrastructure on land under its control, in order to allow and ensure the safe and convenient passage of members of the public through and within the Wylfa Newydd Development Area, including the following facilities:

- A car park at a similar location as the current Ty Croes (Fisherman's car park) a picnic area with bilingual interpretation boards above Porth yr Ogof, which will be accessible by wheelchair from a car park at a similar location to the existing Fisherman's car park.
- New Public Rights of Ways (PRoWs) created on re-profiled land outside of the Power Station Site, linking to the Wales Coast Path, existing PRoW network and Cemaes.
- The Wales Coast Path diverted via a shorter route than used during construction, including a new nature trail with information boards and interest points suitable for all ages, with digital and paper-based maps of the trail made available in Welsh and English.
- A new wildlife watching shelter and information boards provided at the location of the former coastguard lookout on Wylfa Head.
- Interpretation boards provided at Porth Wnal, which will reference the GeoMôn Geopark and the specific geology of this area, in Welsh and English.

6.1.2 For the Off-Site Power Station Facilities, the southern portion of the site surrounding the overflow parking area and adjacent to PRoW 29/008/1 will be soft-landscaped in order to protect the recreational amenity of footpath users during use of the overflow car park. This woodland will be maintained during the operational phase.

6.2 Ecological Compensation Sites

Cors Gwawr and Ty Du

6.2.2 PRoW 23/001/2 and PRoW 23/001/3 will be reinstated following construction works to the Cors Gwawr site.

6.2.3 Where the PRoWs are routed across land within the Order Limits, they will be maintained.

7 Air quality strategy

7.1 General

- 7.1.1 The Operational Travel Strategy (see section 5.3) will reduce the effects of operational road traffic on the environment, including the effects on air quality.
- 7.1.2 Emissions to atmosphere from the Power Station will be regulated by the Environmental Permits issued by NRW. Horizon will comply with all relevant limits and conditions of the Environmental Permits for the site.
- 7.1.3 The testing of the emergency mobile plant stored in the MEEG/AECC building at the Off-Site Power Station Facilities will take place at the main Power Station Site.

7.2 Ultra-low sulphur fuel

- 7.2.1 All combustion plant (including the standby generator) will operate on ultra-low sulphur diesel, which has a sulphur content of 10 parts per million or less (i.e. 0.001% sulphur content), where this does not compromise safety and operational requirements. This will reduce emissions of sulphur dioxide from the generator exhaust by a factor of 100 compared to standard gas oil with a sulphur content of 0.1%.

7.3 Generator testing

- 7.3.1 The selection and procurement of the standby generator will ensure selected equipment has good combustion controls and complies with the relevant European or international emissions standards for emergency generating sets
- 7.3.2 The standby generators and boilers will always be operated in line with the selected equipment manufacturer's operating procedures, and in many cases these will be superseded by Horizon's operating procedures as a nuclear operating facility. Horizon will undertake appropriate routine maintenance and testing of all proposed combustion plant to optimise combustion parameters and avoid abnormal or elevated emissions.
- 7.3.3 For planned testing (post commissioning), only one generator will ever be tested at any one time. In addition, no planned tests on other standby generators will be undertaken within the same day, to eliminate the potential for any combined short-term effects. Additional testing would need be undertaken in line with commissioning and operating procedures, which may include same day testing during commissioning and other infrequent occurrences (e.g. in the unlikely event of a generator breakdown or failures to start).

8 Noise and vibration strategy

8.1 General

- 8.1.1 The Operational Travel Strategy (see section 5.3) will minimise project-wide effects from operational traffic and transport, including in relation to noise and vibration.
- 8.1.2 In relation to the Power Station and Off-Site Power Station Facilities, noise emissions will be associated with:
- the normal operation of power generation;
 - the testing of the emergency mobile plant stored in the MEEG/AECC building at the Off-Site Power Station Facilities will take place at the main Power Station Site;
 - Scheduled Outages; and
 - the testing of emergency alarms, as well as any emergency responses.

8.2 Operational noise management

- 8.2.1 The combined noise level from transformers at the Power Station, including auxiliary transformers and associated cooling systems (hereafter referred to as ‘transformer noise’) has the potential to cause disturbance at local receptors. Therefore, transformer noise shall be subject to appropriate near field limits, selected to achieve a free-field transformer noise level of 25dB $L_{Aeq,T}$ or below at the closest residential receptors. Near field limits will also be selected such that the unweighted transformer noise level does not exceed a level of 38dB within the 125Hz octave band at the same locations.
- 8.2.2 The levels above do not include the contributions of any sources outside the Power Station. Transformer noise will represent a component part of the overall noise from the Power Station at the closest residential receptors.
- 8.2.3 Operational noise and vibration effects will be managed through the application of embedded mitigation in design, as well as the use of the following good practice measures, including:
- selection of low-noise generating equipment where appropriate;
 - regular inspection and maintenance of equipment;
 - ensuring doors and windows of enclosed areas are closed;
 - ensuring all equipment is operated by trained and experienced staff;
 - avoiding noisy activities at night which affect local receptors;
 - implementing measures to control noise during maintenance activities;
 - locating the majority of proposed noise sources (e.g. turbines, back-up generators) within buildings;
 - locating the majority of main power generation equipment in buildings;

- including acoustic attenuators in the combustion air intake and exhaust systems for all combustion units;
- fitting air handling systems with acoustic attenuators, where appropriate; and
- ensuring detailed design of the buildings minimise the potential for noise leakage through openings and penetrations in the building envelopes.

8.2.4 As set out in the application for the Environmental Permit for the combustion plant, operational noise associated with the combustion plant is not expected to cause a disturbance or nuisance. Monitoring will be undertaken on a limited spot check basis at locations agreed with NRW, to ensure that operational noise remains within permitted limits under the Environmental Permit. However, in the event that environmental noise complaints are received or monitoring identifies a breach of permitted operational limits, found to be caused by operational sources at the Power Station, then Horizon will seek to reduce noise levels within permissible limits, as soon as reasonably practicable. In the event of a serious breach, or a continuing breach, Horizon will undertake appropriate actions, in consultation with NRW, to address the problem, including:

- Developing and implementing on site:
 - a programme protocol for conducting routine noise monitoring;
 - a noise reducing programme, identifying noise reducing techniques and equipment;
 - a protocol for responding to noise incidents through containing appropriate actions, channels and timelines; and
 - a review of historic noise incidents, corrective actions and dissemination of noise incident knowledge to the affected parties.
- Reviewing of historic noise incidents, corrective actions taken and disseminating information of noise incident knowledge to the affected parties.

8.3 Noise monitoring

8.3.1 Details of operational monitoring will be established as part of the final specification of the equipment and operations at the Off-site Power Station Facilities. It is anticipated that the eventual monitoring will most likely involve off-site spot check noise surveys at receptors, and some onsite monitoring near particular noise sources at long-term intervals, to be agreed with IACC. Initial monitoring would be carried out quarterly, with results reviewed to determine if the frequency of monitoring should be adjusted. The following measures will be implemented during operation:

- the combined noise rating level from all fixed plant will be designed to be as quiet as reasonably practicable and no greater than background level (LA90) +5dB at nearest residential receptors;

- testing of backup generator to be carried out during daytime periods only; and
- the use of the fuel pump will be restricted to use during daytime period except during an incident or emergency.

8.4 Traffic noise

- 8.4.1 Horizon is committed to a voluntary Local Noise Mitigation Strategy which will offer secondary glazing to residential properties that experience significant noise effects associated with the Wylfa Newydd Project, including changes in traffic, within defined areas near the Power Station Site and A5025 Highway Improvements. A small number of properties may qualify for inclusion in the Local Noise Mitigation Strategy during operation of the Wylfa Newydd Project, however, these are likely to have already qualified during the construction phase.

9 Geological conservation strategy

9.1 Porth Wnal geological site

- 9.1.1 Horizon will continue to allow access, via a formal request to Horizon, to the Porth Wnal Dolerite Regionally Important Geodiversity Site (RIGS) for geologists for geological study of exposed cliff faces at Port Wnal (subject to works and safety requirements) as exposure of new rock during excavations may provide new insight into the geological setting.
- 9.1.2 Horizon will maintain the presence of bilingual information board(s) at Wylfa Head on the GeoMon geological trail in Cemaes to complement that installation and highlight the importance of the geology of the area (the Gwna Melange in this area is the 'world type site' i.e. the benchmark for everywhere else).

10 Surface water and groundwater strategy

10.1 General

10.1.1 Horizon will put in place procedures to protect water resources from any works that may be required during operation, in general accordance with relevant measures used during construction, in relation to:

- protection of watercourses;
- site drainage;
- control of pollution;
- flooding; and
- monitoring.

10.2 Pollution prevention

10.2.1 The overarching pollution management principles to be applied throughout the operation of the Power Station are as follows.

10.2.2 All fuel and chemical storage at the Power Station and Off-Site Power Station Facilities will be within engineered containment facilities, including (where appropriate) suitably bunded tanks, and will comply with the requirements of the Project's Environmental Permit(s). The below-ground fuel storage tanks will comply with the Association for Petroleum and Explosives Administration's guidance including their 'Blue Book' [RD5] and will meet the requirements of The Environment Agency's approach to groundwater protection (which has been adopted by NRW) [RD6]. Above-ground fuel storage of over 200 litres will comply with the Water Resources (Control of Pollution) (Oil Storage) (Wales) Regulations 2016.

10.2.3 At all sites, storage areas for fuel and chemicals will be located more than 15m away from watercourses, and protected to avoid damage by plant and vehicles. Operational pollution prevention controls will be defined at all sites and will include measures relating to:

- the designation of refuelling areas and areas handling liquid chemicals;
- operational controls around access to and use of refuelling and chemical storage facilities;
- regular inspection and maintenance of fuel and chemical storage facilities and associated equipment, including oil interceptors;
- spill response and clean-up procedures;
- inspection and regular maintenance of any on-site sewage pipes, and any on-site treatment systems or related sewage infrastructure;
- cleaning out of any sediment traps on the drainage system; and
- regular inspection of the parking areas for fuel and oils.
-

10.3 Flooding

- 10.3.1 A documented flood mitigation action plan will be developed to ensure that in the event of flooding occurring on site appropriate plans are in place to manage the risks and ensure that there is no increased risk to human health and that risks to property are managed appropriately. The plan would, as a minimum, include details of the requirements for monitoring regulatory flood warning alerts, identification of safe meeting areas, access and egress routes, activities required to secure plant and equipment in the event of a flood being forecast, checking of drainage systems, roles and responsibilities and checking procedures.

10.4 Drainage management

Power Station

- 10.4.1 Foul water discharge will be to the Dŵr Cymru Welsh Water Sewage Treatment Works. Foul water will not be discharged to the surface water environment.
- 10.4.2 Horizon will develop a passive engineered drainage system by completion of construction as set out in the LHMS (Application Reference Number: 8.16). Such drainage system, will be managed in relation to sensitive ecological receptors and incorporate appropriate attenuation to prevent any increase to flood risk offsite and reduce significant effects on water availability.

Off-Site Power Station Facilities

- 10.4.3 Horizon will maintain the swale between the main part of the Off-Site Power Station Facilities site and the area of additional car parking. Maintenance will include regular inspection and if necessary clearing out to ensure that the swale does not become overgrown or blocked such that it would limit water movement.

10.5 Maintenance

- 10.5.1 Inspection and maintenance (where inspection has identified this requirement) of the drainage system will be undertaken, particularly oil water separators, attenuation facilities, and culverts and below-ground pipes, to ensure they are operating effectively and to prevent pollution and flooding.

10.6 Monitoring

- 10.6.1 A monitoring regime will be developed for the surface water and groundwater environment at and around the Power Station as appropriate, and to be agreed with the regulator. This will include appropriate monitoring of water quality and quantity (groundwater levels and surface water flows) at and around Tre'r Gof Site of Special Scientific Interest (SSSI), and Cae Gwyn SSSI to identify any changes to baseline conditions, for a period of at least five years following completion of the landform, which may require management.

11 Terrestrial and freshwater ecology strategy

11.1 Landscape and Habitat Management

11.1.1 The LHMS (Application Reference Number: 8.16), a certified document, secures the creation and management of a range of key landscape elements and wildlife habitats within the Wylfa Newydd Development Area and the following areas. During the construction and operation stage of the Power Station. The LHMS applies to a range of habitats including but not restricted to:

- Tre'r Gof SSSI, including botanical monitoring to identify any hydrological impacts;
- Notable Wildlife Enhancement Site;
- the Reptile Receptor Site;
- the Ancient Woodland Receptor Site;
- maintenance of artificial red squirrel nest boxes in the Dame Sylvia Crowe wooded mounds; and
- habitat management for chough at Wylfa Head.

11.2 Licence requirements

11.2.1 European Protected Species Mitigation Licences will be required to be obtained for the Wylfa Newydd Project from NRW in relation to great crested newt and bats. A Conservation Licence will also be required to be obtained from NRW in relation to water voles. Horizon will comply with the terms of the above licences, which will be determined by NRW, including any operational management requirements arising.

12 Landscape and visual strategy

12.1 General

- 12.1.1 Horizon will implement and maintain a long-term landscape management scheme, to ensure successful establishment of proposed landscaping and long-term viability of planting. The landscape management scheme will be in general accordance with the landscape principles set out in the LHMS (Application Reference Number: 8.16) and Design Access Statements, volume 1, 2 and 3 (Application Reference Numbers: 8.2.1, 8.2.2, 8.2.3 respectively) for the Wylfa Newydd Development Area and the Off-Site Power Station Facilities.

12.2 Spent Fuel Storage Facilities site

- 12.2.1 The area reserved for the proposed Spent Fuel Storage facility will be temporarily seeded and managed as grassland, until the area is required for development.

12.3 Off-site Power Station Facility

- 12.3.1 Horizon will continue the landscape site inspections commenced under the Off-site Power Station Facility Sub CoCP for the remaining duration of the original period (total 10 years). In the event that these inspections identify that planting has not established, replacement planting on a like for like basis will be undertaken at the first available planting season.

13 Cultural heritage strategy

13.1 General

- 13.1.1 Should any earthworks be required during operation, works will proceed in accordance with measures set out in section 12 of the Wylfa Newydd CoCP (Application Reference Number: 8.6) and relevant sections of any relevant sub-CoCP.
- 13.1.2 This means that, if significant archaeological remains are discovered and construction works will affect those remains, works in that area will cease immediately so that appropriate mitigation measures could be developed in consultation with Horizon and Gwynedd Archaeological Planning Service. Works would continue in the vicinity of the remains upon implementation of the approved mitigation.

14 Coastal processes and marine environment strategy

14.1 General

- 14.1.1 Horizon will put in place mitigation to reduce as far as practicable adverse effects on the surrounding environment, including those relating to coastal processes and coastal geomorphology, and the marine environment, during the operation of the Wylfa Newydd Project, including through the application of appropriate strategies, as set out below.

14.2 Cooling Water System

- 14.2.1 Horizon will implement a monitoring programme for entrapment (impingement and entrainment) associated with the cooling water intake system. This will assess the effectiveness of fish protection measures embedded in the system during the operation of the Power Station, through a programme agreed with NRW, and enable any improvements to mitigation measures to be made where necessary.
- 14.2.2 To control biofouling, treatment of the (Cooling Water System) CWS is required. Sodium hypochlorite or appropriate alternatives would be used for this purpose. Management of the biocide dosing regime, while preventing harm to fish impinged on screens, will be in line with best practice. Continuous dosing will be applied during a higher fouling risk period. The biocide dosing regime would be designed to reduce biofouling risk, normally between April and December, when sea temperatures are above 10°C. Typically, biocide dosing would be applied to all areas of the CWS except around the fine mesh screens to prevent harm to fish impinged upon them.

14.3 Invasive Non-Native Species

- 14.3.1 A monitoring programme for Invasive Non-Native Species will have commenced once construction of the breakwaters and MOLF is completed, including observational surveys on structures that may provide suitable substrate for Invasive Non-Native Species. The ongoing requirement for monitoring during the operational phase will be regularly reviewed and agreed with NRW.

14.4 Marine monitoring programme

- 14.4.1 Horizon will implement a monitoring programme for the marine ecological enhancement measures and permanent structures, developed in consultation with NRW. The aim will be to determine the success of habitat enhancement by monitoring the colonisation of new structures, allowing adaptive management. The monitoring data will be used to inform the decision to implement further ecological enhancement if necessary.

15 Waste management strategy

15.1 General

- 15.1.1 Horizon will manage all waste generated during the operation of the Power Station in accordance with their Waste Hierarchy and the proximity principle.

15.2 Radioactive waste management

- 15.2.1 As stated in section 2.4, the Office for Nuclear Regulation will oversee Horizon's control of the safety of the Power Station, including the accumulation, storage and management of radioactive waste, in accordance with the requirements of the nuclear site licence.
- 15.2.2 Section 2.5 references the Radioactive Substances Regulation Environmental Permit (Environmental Permitting (England and Wales) Regulations 2016), which permits the discharge and disposal of radioactive wastes. Horizon will be required to comply with the limits and conditions associated with the environmental permit (regulated by NRW).

15.3 Integrated waste management

- 15.3.1 The basis of the approach to waste management across the Wylfa Newydd Project is Horizon's Waste Hierarchy (figure 15-1). It aims to encourage the management of waste pro-actively in order to minimise the amount that is discarded and to recover the maximum value from the wastes that are produced, with disposal as a final option.

Figure 15-1 The Horizon Waste Hierarchy



- 15.3.2 Horizon will review all waste management licenses, Environmental Permits or exemptions of services Horizon procure to ensure all waste carries, brokers

and holders are licensed and permitted to handle the specific types of wastes in transit, from transfer from sites or offices to the final point of disposal.

15.3.3 Horizon will comply with all relevant waste legislation.

15.4 Waste controls on all sites

15.4.1 Horizon will implement waste controls to manage conventional operational waste including, for example:

- optimising opportunities for reuse, recycling and recovery of wastes through segregation;
- take a proportionate and scalable approach to managing office waste; and
- identifying the most appropriate management route of a particular waste, depending on its characteristics and classification as non-hazardous or hazardous waste.

15.5 Waste Duty of Care

15.5.1 Horizon will categorise waste according to the European Waste Catalogue (EWC), and classify materials as hazardous, non-hazardous or inert according to their physical, chemical and biological properties.

15.5.2 Horizon will comply with, and ensure that others under Horizon's control comply with, their statutory obligations with respect to waste including the 'duty of care' requirements which will apply under section 34 of the Environmental Protection Act 1990, and the requirement to arrange legal and compliant waste management services, including review of the transfer note (non-hazardous) or consignment note (hazardous) as part of Horizon's compliance with its statutory obligations.

15.6 Waste handling and treatment facility

15.6.1 All conventional wastes generated at the Power Station Site will be handled at a waste handling and treatment facility (Conventional and Hazardous Waste Building and Conventional Waste Storage Compound) which will be located on the Power Station Site. This will be a fenced facility managing waste in accordance with the following:

- waste will be received within a reception area;
- waste will be dismantled into individual waste types;
- hazardous and non-hazardous wastes will be segregated and stored in designated storage areas;
- recyclables (such as plastics, cardboard and/or paper) will be segregated and stored in a separate area; and
- large containers and portable compactors will be stored in an external yard.

- 15.6.2 Horizon will retain conventional waste until it is removed from site by a licensed waste management contractor.
- 15.6.3 The waste handling and treatment facility will enable the safe segregation and storage of wastes in compliance with legislation prior to transferring the wastes to a suitable treatment route, in line with Horizon's Waste Hierarchy which aligns with the Waste Framework Directive. As with the approach followed during construction, Horizon will fulfil the requirements of the Waste (England and Wales) Regulations 2011 (amended 2014) and the Environment (Wales) Act 2016 in applying the Waste Hierarchy (see figure 15-1), wherever practicable, and ensuring that pre-treatment of waste is undertaken prior to disposal to landfill.

16 References

Table 16-1 Schedule of references

ID	Reference
RD1	Institute of Environmental Management and Assessment. 2015. <i>Delivering Quality Development</i> . Lincoln: IEMA.
RD2	British Standards Institution. 2015. <i>BS EN ISO 14001:2015 Environmental management systems. Requirements with guidance for use</i> . London: British Standards Institution.
RD3	British Standards Institution. 2015. <i>BS EN 12464-2:2014 Light and lighting – Lighting of work places. Part 2: Outdoor work places</i> . London: British Standards Institution.
RD4	Institute of Lighting Engineers. 2011. <i>Guidance Notes for the Reduction of Obtrusive Light GN01:2011</i> . Rugby: Institution of Lighting Engineers.
RD5	Association for Petroleum and Explosives Administration. 2011. <i>Guidance for Design, Construction, Modification, Maintenance and Decommissioning of Filling Stations</i> .
RD6	Environment Agency. 2017. <i>The Environment Agency's approach to groundwater protection. Version 1.0</i> . Bristol: Environment Agency.