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Summary of Written Representations
Landscape and Visual Issues

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In respect of DCO Application
Wylfa Newydd
Nuclear Power Station
by Horizon Nuclear Power

On behalf of
National Trust Wales

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Summary of Landscape and Visual Representations

Introduction

1. This summary representation has been prepared with regards to the landscape and visual aspects of the Development Consent Order (DCO) application for the Wylva Newydd Nuclear Power Station. (WNNPS) It has been prepared on behalf of the National Trust (NT) in response to the Examining Authority's (ExA) request for Deadline 2 (4th December 2018) and its focus is on the NT's interests in the area surrounding the Wylva Newydd Development Area (WNTDA). It is based on assessment of the relevant documentation submitted by Horizon Nuclear Power in support of the Wylfa Newydd DCO application and on field surveys undertaken since 2015.

Key Issues

2. The key landscape and visual issues that have been identified concern the lack of information that has been provided with regard to both construction and operational impacts on land in which the NT has an interest. This includes the land that lies between the WNTDA and the coast which contains a residential property owned by the NT, three listed buildings associated with that property and a Registered Park and Garden (not owned by the NT). Due to the lack of information provided and the large scale at which the drawings have been prepared, it is not possible to be sure that adequate mitigation measures have been secured that will minimise the landscape and visual impact of the WNNPS in this area. It is also not possible to understand the interaction between the WNTDA and the immediately adjacent land to the north and north west either during the construction period or during operation.

Impact on Isle of Anglesey's Area of Outstanding Natural Beauty (Anglesey AONB)

3. It is considered that the assessment of the impact on the Isle of Anglesey AONB (Anglesey AONB) has been underestimated and consequently that the effects on the AONB and on the setting of the AONB have not been minimised. The PSS includes land within the AONB, the western portion of the WNDA is located within AONB and the WNDA is surrounded by the AONB to the north and north west. The first overarching principle in the Landscape and Habitat Management Strategy (LHMS) needs to be changed as it refers only to minimising impacts on the setting of the AONB whereas it should refer to minimising impacts on the AONB itself.
4. The proposals for Mound E within the LHMS are a clear example of:
 - The lack of information and conflicting information that has been provided;
 - The degree of flexibility that has been built into the draft DCO which means there is a lack of certainty about the final landform and the impact of it on the adjacent AONB land /NT land;
 - The failure to minimise impacts to the AONB.
5. The impact of the remodelling of Mound E at the end of the construction period will noticeably extend the period for which there will be significant adverse impacts on the AONB, the access to Cemlyn Lagoon and visitors to the Cemlyn Lagoon and the AONB. There is no evidence to show that alternatives have been considered that would enable Mound E to be completed, planted and restored early in the construction process, in order to minimise the impact on the AONB and to improve ecological connectivity early in the construction period.

6. Within the LHMS only Section 4 (Landscape and Habitat Design Principles) and Section 7 (Implementation and Long-Term Management) are secured by the DCO requirement. These sections are mostly concerned with general principles and lack the details required for certainty that the positive outcomes described in the LHMS can be secured. For example, there are only three secured principles with regard to earthworks. It is considered that the reworking of Mound E is in conflict with the second of these principles which states that *'Earthworks will provide temporary storage solutions using stockpiles where this does not conflict with other principles in the LHMS'*¹. The use of Mound E for temporary storage is contrary to the first overarching principle of minimising harm to the AONB and to the setting of the AONB.
7. The requirement for seeding and planting for an early establishment of outer slopes, which is required in Earthworks principle 3 for slopes facing Tregele and Cemaes, should be extended to include at least the western and north western slopes of Mound E.

6.4.10 ES Volume D D10 - Landscape and visual (ES LVIA)

8. The photomontages submitted with the ES LVIA (6.4.65 ES Volume D D10-8 - Photomontage views do not provide sufficient detail as to the interface between the WNDA and the land the north and north west and do not show the interface between Mound E and the adjacent landscape.
9. No Residential Visual Amenity Assessment has been undertaken for residential receptors at Felin Gafnan. As there is no detail of the impacts there are no proposals for their mitigation.
10. The palette of natural colours is given as a key visual mitigation measure, but no detailed information has been provided.

¹ 8.16 Landscape and Habitat Management Strategy Page 61

11. The LHMS acknowledges that the WNDA is dominated by its proximity to the coast and its seascape setting.² However, the LHMS provides no information on how impacts on the seascape will be minimised. There is no mention of seascape in the Design Principles in Section 4 (one of the two secured sections of the LHMS), no mention of the design of the marine structures and no information on how areas of shoreline will be restored.
12. 6.4.10 ES Volume D D10 - Landscape and visual (ES LVIA) has underestimated the effects on the AONB by assessing the effects of the development against '*the AONB as a whole*'. Such an assessment is meaningless as it will always result in the conclusion that the effect is 'not significant' (minor in the case of operational effects, negligible with regard to site preparation and clearance)³. It is hard to envisage a larger development than the WNNPS, located partly within and adjacent to the AONB. The only purpose of the assessment appears to be to downplay the overall effect on the AONB.
13. The ES LVIA has also failed to properly reflect the sensitivity of landscape and visual receptors in its conclusions on the significance of effects. This is due to the way it has applied a scale with only four terms major, moderate, minor and negligible. This has resulted in a coarse-grained assessment where for almost all⁴ high sensitivity receptors subject to a medium magnitude of change the significance of the effect has been judged to be moderate. The result is a very large number of 'moderate effects' that does not provide appropriate differentiation between high and medium sensitive receptors and does not properly reflect the sensitivity of highly sensitive landscape and visual receptors.
14. The assessment of effects, particularly visual effects at 15 years has not considered the future baseline, principally how the Existing Power Station will appear in 15 years when it will be some way into its decommissioning, nor whether the associated Overhead lines and pylons would change over the next 15 years if Wylva Newydd was not built.

² 8.16 LHMS Page 19 Figure 2-3 a.

³ 6.4.63 ES Volume D D10-6 - Landscape effects schedule Table 1.1 Pages 1-5)

⁴ All landscape receptors, all but two visual receptors.

Conclusion

15. In summary, the key landscape and visual concerns with regard to the DCO application for WNNPS are:
- Remodelling of Mound E which will noticeably extend the period for which there will be significant adverse impacts on the AONB, the access to Cemlyn Lagoon and visitors to the Cemlyn Lagoon and the AONB;
 - Insufficient attention has been given to minimising the impact of the development on the AONB and the setting of the AONB;
 - There is a lack of detailed information for the area north and north west of the WNDA where the NT has a significant interest;
 - There is a lack of certainty over the final landform and the interface between the WNDA and the surrounding land to the north and north west;
 - There is no mitigation strategy to address the impacts on the visual amenity of residents at Felin Gafnan; and
 - There are no detailed proposals to mitigate the significant adverse impacts identified on the group of listed buildings at Felin Gafnan.
 - The application of the methodology has resulted in conclusions on the significance of effects that do not properly reflect the sensitivity of highly sensitive landscape and visual receptors.



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