

From: [Marlborough, Neil](#)
To: [Wylfa Newydd](#)
Cc: [Harding, Helen](#); swyddfa@cyngortrefamlwch.co.uk
Subject: Wylfa Newydd Examination Deadline 2: NACP responses
Date: 04 December 2018 20:15:38
Attachments: [image001.png](#)
[NACP Construction working hours.pdf](#)
[NACP Local Opportunities.pdf](#)
[NACP Residential Amenity.pdf](#)
[NACP Suggested site visit locations .pdf](#)
[NACP Temporary workers accommodation.pdf](#)
[NACP Tourism and recreation.pdf](#)
[NACP Traffic and Transport A5025 Treglele.pdf](#)
[NACP Traffic and Transport crosscountry routes.pdf](#)
[NACP Traffic and Transport other matters.pdf](#)

On behalf of the North Anglesey Councils Partnership (NACP), please find within this email and attached their responses to the Deadline 2 requests of the Wylfa Newydd examination.

The responses include the following:

- Written Representations on:
 - Temporary Workers Accommodation
 - Tourism and Recreation
 - Local Opportunities
 - Construction working hours
 - Residential Amenity
 - Traffic and Transport: A5025 Treglele
 - Traffic and Transport: Cross country routes
 - Traffic: other matters
- Recommendations on locations for site visits

In response to the Written Questions posed, two questions were specifically posed to the NACP (referred to as NAP in the WQs):

Q7.0.5: The NACP are surprised that no photomontages have been produced to show the Construction Phase activities at WNDA and request that photomontages are provided from this phase of works. Not showing the predicted impacts from such a major construction exercise, lasting for 9 years, is considered to be a significant omission which risks underplaying the landscape and visual effects from these works in the examination.

Q14.0.10: The NACP have concerns around the focus of temporary worker accommodation on a single campus in the WNDA. Whilst this primarily is due to reasons of worker numbers on one site, and the loss of legacy benefits from using other site(s), the concentration of development in this environmentally sensitive area is also a concern. A smaller scale of development would be less intrusive from an environmental perspective and a better option. Due to the lower numbers of temporary workers which would be able to be accommodated on the WNDA site because of this approach, additional development will be needed elsewhere and can be provided on other site(s) such as Rhosgoch.

Regards

Neil Marlborough
Technical Director, Planning and EIA

Wood Environmental & Infrastructure Solutions UK
Direct: +44 (0)191 2726334
Mobile: +44 (0)7971 337725
www.woodplc.com



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Wylfa Newydd Nuclear Power Station:

NACP Written Representation: Residential Amenity

1. Introduction

- 1.1.1 The NACP area has hosted a Nuclear Power Station for over 60 years. In that time Wylfa A has been a good neighbour, the NACP support in principle the Wylfa Newydd project and recognise that the development of this project will require a large-scale construction project which will have impacts on the local communities. The NACP have concerns over the nature of some of these impacts and their proximity to individual properties and settlements.
- 1.1.2 This Written Representation will provide information to answer Written Question **Q14.0.10** presented to NACP, and it will help with consideration of those questions grouped under **Parts 1 7 and 9** and **Q4.0.6** of the Written Questions.

1.2 Context

- 1.2.1 The DCO application contains differing details of the area of the WNDA ranging from 407ha to 463ha of land (APP-406, Document 8.1 Planning Statement). Despite this large area, construction activities including temporary and permanent landform creations and laydown areas for plant and materials would take place on land close to the two largest settlements neighbouring the WDNA: Cemaes and Tregle. In some cases, within 30m of properties.
- 1.2.2 The ES states that 1,171 residential properties would experience residual significant effects during the construction phase due to noise, along with 5 hotels, 1 school, 1 place of worship and 6 commercial/office properties. This is in addition to effects from vibration (APP-125, Document 6.4.6 and PD-009, Q9.0.11). It also states that there would no significant effects from air quality or dust on residents and that a number of communities would receive significant effects from visual impacts and lighting.

2. Noise

- 2.1.1 The NACP consider that the ES is very difficult to navigate and understand in relation to a number of topics, but specifically in relation to noise. Chapter D-6 (APP-125, Document 6.4.6), for the WNDA assessment, indicates that 1,203 residential properties were assessed for noise impacts and 1,178 (although Horizon state 1,177) would receive significant effects in the construction phase, prior to mitigation (Table D6-18). Table 6-35 then shows that 1,171 properties would have significant residual effects during the construction phase following mitigation. This shows that only 7 properties will benefit from additional mitigation. The ES does not explain in detail which properties are significantly affected as the properties are assessed by groups, but across these groups there are a range of noise levels shown on the accompanying plans and the scale and level of detail make it almost impossible to discern which properties falls within which category. Local residents are therefore very concerned over whether their properties will be significantly affected and to what degree. From the figures it appears the greatest number of affected properties would

be in Cemaes and Tregle (groups B and F in Horizon's assessment groups). Document J-2 (APP-399, Document 6.10.2), which summarises all residual effects, does not use the same groupings and it is not clear whether it includes all 1,171 properties identified in Chapter D-6. It does not, for example, include any mention of residential properties within Cemaes and there is concern that Horizon are underplaying the significant noise effects with this disjointed approach.

- 2.1.2 The information in tables D6-18 and D6-35 shows that 42 residential properties will see the effects reduced from major adverse, so the mitigation measures proposed will have the effect of reducing significant effects from major adverse to moderate adverse. However, there are only 7 properties (although Horizon state 6) that will apparently drop from moderate to minor and become not-significant. Therefore, the proposed mitigation measures are only successful in removing significant effects from 7 residential properties out of 1,178. The measures proposed also seem only to relate to trying to mitigate the effects as they relate internally at properties. There will also be effects on people using external private space (gardens) and on people using public open spaces.
- 2.1.3 The NACP believe this shows that the mitigation proposed is unacceptable and if nothing further can be done to reduce noise levels during the construction phase it must call into serious question the acceptability of the construction scheme as proposed.

3. Air quality and dust

- 3.1.1 The ES concludes (APP-124, Document 6.4.5) that there would be no significant effects arising on air quality, from either emissions from plant and vehicles, or from dust raised by working activities due to a combination of factors including:
- the prevailing wind direction,
 - the use of new and efficient plant, machinery and vehicles,
 - the use of good working practices (which are standard in the UK),
 - and the distances between source points and many receptors.
- 3.1.2 For the operational phase, the NACP are content that the key concerns regarding air quality would be around the emissions from plant at the power station, but that these can all be appropriately controlled by the environmental permitting procedures. During construction, the NACP are surprised at the findings of no significant effects on any residential receptors, due to the proximity of some residential properties to the site, and particularly to earthwork operations. However, the mitigation measures described for dealing with soil handling, storage and use of materials and the management of haul roads and vehicle cleaning all appear to be robust and in line with best practice for these types of operations.
- 3.1.3 The approach will however rely heavily on the mitigation measures being implemented properly and it is therefore important that IACC are confident that they have the resources and capabilities to suitably monitor the construction works to check all of the recommended mitigation is being followed. The NACP are pleased to therefore see a contribution in the Section 106 agreement (REP1-010) to cover the costs of monitoring for IACC, and assuming that IACC are agreeable; to the details of this contribution the NACP have no objections in relation to air quality and dust.

4. Visual impact and lighting

- 4.1.1 The NACP acknowledge that the ES identifies significant effects on a range of receptors, including the communities of Cemeas, Tregele, Llanfairynghornwy and Llanfechell, but also users of the highway and PRow networks during the construction phase from the WDNA proposals (APP_129, Document 6.4.10). The ES also identifies some significant effects on these receptors during the operational phase and the NACP acknowledges that a large-scale development such as this will inevitably leave permanent effects of this nature. However, the ES does not seem to include photomontages of the construction phase activities, only showing years 1 and 15 of the operational phase (APP-199, Document 6.4.65). The NACP are concerned with regard to the large number of significant effects identified during the construction phase, and the large number of residents in the local communities that will experience these effects. The lack of photomontages for the construction phase is worrying however as it is not possible for local residents to see the full extent of visual effects during this stage nor to get an idea of potential effects from lighting. Significant earthworks are required to create some of the landscape mounds close to Cemeas and Tregele which will themselves create significant visual effects, but the ES also identifies that construction activities, including the use of large cranes and some building structures, will be visible above these mounds. It therefore feels like the 9-year period of construction, with associated significant effects, is being underplayed.

5. Conclusion

- 5.1.1 The submitted ES identifies a substantial amount of local properties and communities which will be adversely affected by the working arrangement during the construction phase in particular. The NACP would like to see a whole-scale review of the working practices proposed, and the mitigation being offered to reduce the significant effects identified. For any significant effects which do remain, the NACP would like to see further detail provided so that local residents have clarity over which specific properties are affected.

Issued by**Neil Marlborough****Approved by****Sue Birnie****Copyright and non-disclosure notice**

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