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Subject: Wylfa Newydd DCO Deadline 3 Submissions [NOT PROTECTIVELY MARKED]
Date: 17 December 2018 18:14:21
Attachments: [18 Horizon's Response to Written Representation - IACC .pdf](#)
[19 Horizon's Response to Written Representation - North Wales Police .pdf](#)
[20 Horizon's Response to Written Representation - North Wales Fire and Rescue Service .pdf](#)
[21 Horizon's Response to Written Representation - Welsh Ambulance Services Trust .pdf](#)
[22 Horizon's Response to Written Representation - People Against Wylfa B .pdf](#)
[23 Horizon's Response to Written Representation - J Chanay .pdf](#)
[24 Horizon's Response to Written Representation - National Grid .pdf](#)
[25 Horizon's Response to Written Representation - eNGO Biodiversity Cemlyn Nature Reserve .pdf](#)
[26 Horizon's Response to Written Representation - North Wales Wildlife Trust .pdf](#)
[27 Horizon's Response to Written Representation - National Trust .pdf](#)
[28 Horizon's Response to Written Representation - Public Health Wales .pdf](#)
[29 Horizon's Response to Written Representation - Holyhead Council .pdf](#)
[30 Horizon's Response to Written Representation - Network Rail Infrastructure Ltd .pdf](#)
[31 Horizon's Response to Written Representation - North Anglesey Councils Partnership .pdf](#)
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[16 Horizon's Response to Written Representation - Welsh Anti-Nuclear Alliance .pdf](#)
[17 Horizon's Response to Written Representation - Zencity Limited .pdf](#)

Good Evening

This is the second in a series of 8 e-mails for the Wylfa Newydd DCO Examination Deadline 3 deliverables.

The list below provides a complete list of all documents attached to this e-mail and we will also be delivering 2x USB pen drives containing all of our Deadline 3 submission to your offices at 10:00 tomorrow (Tuesday 18th December).

16 Horizon's Response to Written Representation - Welsh Anti-Nuclear Alliance .pdf
17 Horizon's Response to Written Representation - Zencity Limited .pdf
18 Horizon's Response to Written Representation - IACC .pdf
19 Horizon's Response to Written Representation - North Wales Police .pdf
20 Horizon's Response to Written Representation - North Wales Fire and Rescue Service .pdf
21 Horizon's Response to Written Representation - Welsh Ambulance Services Trust .pdf
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32 Horizon's Response to Written Representation - Nuclear Decommissioning Authority .pdf
33 Horizon's Response to Written Representation - Welsh Government .pdf

Kind Regards

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Wylfa Newydd Project

Horizon's Response to Written Representation – People Against Wylfa B

PINS Reference Number: EN010007

18 December 2018

Revision 1.0

Examination Deadline 3

Planning Act 2008

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

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1 Horizon's Response to People Against Wylfa B's Written Representation

1.1 Introduction

- 1.1.1 This report provides Horizon's response to the Written Representation submitted by People Against Wylfa B at Deadline 2 (4 December 2018). For ease, cross-references are provided (where appropriate and feasible) and the response generally follows the structure and sequence of the Written Representation received. Horizon has endeavoured to respond to the key matters raised in this Written Representation. Where Horizon has not responded to a particular point or issue raised by an Interested Party, this should not necessarily be taken as agreement with that point.

1.2 Issues regarding planning policy and Horizon's inability to meet 2025

- 1.2.1 This is in response to PAWB's comments on the issues raised regarding planning policy and Horizon's inability to meet 2025.

Government policy on the need for new nuclear power

- 1.2.2 The principle of the need for new nuclear power stations, and that this need is urgent, is firmly established in the Overarching National Policy Statement (NPS) for Energy (EN-1) and NPS for Nuclear Power Generation (EN-6) and is reaffirmed by the Ministerial Statement on Energy Infrastructure (December 2017) (the 'Ministerial Statement') and the Government Response: Consultation on the Siting Criteria and Process for a New National Policy Statement for Nuclear Power with Single Reactor Capacity Over 1 Gigawatt Beyond 2025 (July 2018) (Document 29) (the "Government Response to the Consultation on Siting and Process").
- 1.2.3 EN-1 sets out that the UK Government believes there is an urgent need for new electricity NSIPs to meet energy security and carbon reduction objectives, the need to replace closing electricity generating capacity, to support an increased supply from renewables and future increases in electricity demand.
- 1.2.4 EN-6, stresses the urgency of bringing forward new nuclear power projects as part of the drive to decarbonise the UK's electricity supply and to increase energy security. EN-6 included the Wylfa site as a potentially suitable site for the deployment of new nuclear before the end of 2025, subject to certain matters that require further consideration through the DCO application. The UK Government (in including the Wylfa site in the NPS EN-6) concluded that none of these factors were sufficient to prevent the site from being considered potentially suitable. In NPS EN-6 specifically states that there are no other known alternatives to the listed sites that are potentially suitable for the deployment of new nuclear power stations in England and Wales before the end of 2025.
- 1.2.5 The UK Government's continued support for new nuclear power generation is set out in the Ministerial Statement which states that "new nuclear power

stations have an important role to play", "nuclear is vital to our energy mix", and that the UK Government "believes that it is important that there is a strong pipeline of new nuclear power to contribute to the UK's future energy system". The UK Government also reaffirmed its commitment to nuclear power in the Government Response: Consultation on Siting and Process which provides that the "Government continues to believe that nuclear has an important role to play in the UK's energy future as we transition to the low-carbon economy".

- 1.2.6 The UK Government is currently bringing forward a new NPS applicable to nuclear power plants deployed after 2025 and capable of deployment by the end of 2035. The UK Government has previously consulted on the process and criteria for this. The Government Response to the Consultation on Siting and Process published in July 2018 states that the UK Government proposes to carry forward the sites listed in EN-6 (including Wylfa Newydd) into the new NPS, subject to them meeting the updated siting criteria and updates of their environmental assessments. Horizon has submitted a nomination for the Wylfa site, and the UK Government is assessing the nomination against the criteria and undertaking an Appraisal of Sustainability. The UK Government estimates that it will lay the final NPS before Parliament in spring 2020.

Applicability of NPS EN-1 and NPS EN-6

- 1.2.7 Although NPS EN-6 applies to projects that will deploy prior to 2025, the Ministerial Statement issued by the Department for Business, Energy and Industrial Strategy in December 2017 confirms that "the Government is confident that both EN-1 and EN-6...will continue to be important and relevant for projects that deploy after 2025... In respect of matters where there is no material change in circumstances it is likely that significant weight should be given to the policy in EN-1 and EN-6". The UK Government also reaffirmed its commitment to nuclear power in the Government Response to the Consultation on Siting and Process which provides that the "Government continues to believe that nuclear has an important role to play in the UK's energy future as we transition to the low-carbon economy".
- 1.2.8 The Ministerial Statement provides that, until a post-2025 nuclear NPS is adopted (expected to be in spring 2020), nuclear power station projects applying for development consent and due for deployment beyond 2025 should be considered under section 105 of the Planning Act 2008.
- 1.2.9 The Ministerial Statement is clear that EN-1 and EN-6 remain important and relevant matters which would carry significant weight in determining the application under section 105. The Ministerial Statement states:
- 1.2.10 "Government is confident that both EN-1 and EN-6 incorporate information, assessments and statements which will continue to be important and relevant for projects which will deploy after 2025, including statements concerning the need for nuclear power – as well as environmental and other assessments that continue to be relevant for those projects. As such, in deciding whether or not to grant development consent to such a project, the Secretary of State would be required, under section 105(2)(c) of the Act, to have regard to the content of EN-1 and EN-6, unless they have been suspended or revoked. In

respect of matters where there is no relevant change of circumstances it is likely that significant weight would be given to the policy in EN-1 and EN-6."

Additional support for new nuclear power

- 1.2.11 The need for new nuclear power is urgent, and further evidence for is set out in the report commissioned by Horizon and submitted alongside the DCO application (Appendix G to the Planning Statement [APP-406]) which examined the available evidence about the need for new nuclear power. The report presented evidence for the continued need for new nuclear power to deliver the UK's energy requirements to 2025 and beyond and concluded that the significant lead time for delivery of new nuclear capacity makes this need urgent. The report demonstrates that:
- Electricity demand is expected to increase substantially by 2035;
 - A significant proportion of existing electricity generating capacity is expected to close by 2035;
 - There is an apparent absence of proven, low-carbon technologies that could provide credible alternatives to new nuclear generation and be deployed at sufficient scale; and
 - The UK's obligations toward meeting emissions targets further accentuate the need for new nuclear power.
- 1.2.12 In addition to Horizon's own evidence submitted alongside the DCO application, several other independent, authoritative reports point clearly to the key role nuclear will have in a future low carbon energy mix:
- 1.2.13 National Grid's Future Energy Scenarios, on which Horizon's own evidence draws, shows that through to 2050 peak demand could rise by over 40% (60GW to 85GW) driven by a number of factors, including dramatic increases in electric vehicle take-up and electrification of heat. The Future Energy Scenarios are clear that "new nuclear is required in all scenarios" but also show that the two scenarios with the biggest increase in peak demand, driven by the biggest uptake of electric vehicles and electrification of heat, are also the two scenarios that involve the biggest role for nuclear – as demand increases and as the distinction between electricity and energy is increasingly blurred, so the need for new nuclear increases.
- 1.2.14 A comprehensive analysis from the Massachusetts Institute of Technology's Energy Initiative, "The Future of Nuclear Energy in a Carbon-Constrained World", showed the "essential" role that nuclear has in "achieving a deeply decarbonized energy future" and that without nuclear "the cost of achieving deep decarbonisation targets increases significantly."
- 1.2.15 The European Commission's strategy "A Clean Planet for All", which was underpinned by in-depth analysis, talked off nuclear – alongside renewables – as being "the backbone of a carbon-free European power system" and made clear that "nuclear energy (based on nuclear fission) is a well-established large-scale zero-carbon technology in power generation"

- 1.2.16 The Intergovernmental Panel on Climate Change's report on limiting global warming to 1.5 degrees above pre-industrial levels set out that in the majority of "pathways" compatible with 1.5 degrees there was a key role for nuclear.

1.3 Concern regarding the adequacy of Horizon's public consultations with specific reference to radioactive waste and energy security

Adequacy of Consultation

- 1.3.1 Please see the Consultation Report [APP-037] which details the approach undertaken by Horizon to both formal pre-application consultation and additional informal consultation with stakeholders and the community.
- 1.3.2 Horizon has undertaken a comprehensive consultation process through both statutory and non-statutory engagement with the local community and key stakeholders. Horizon has undertaken a multi-stage pre-application consultation process to ensure that consultees had the opportunity to provide feedback at appropriate points in the development of the proposals. The formal stages of the pre-application consultation process were:
- Stage One Pre-Application Consultation: September – December 2014;
 - Stage Two Pre-Application Consultation: August – October 2016;
 - Stage Three Pre-Application Consultation: May – June 2017; and
 - Consultation on Additional Land: January – February 2018
- 1.3.3 In addition to the formal consultation stages, other periods of informal consultation were also undertaken. This informal consultation included working groups, community liaison groups and update events.
- 1.3.4 The Consultation Report describes how Horizon has analysed, recorded and had regard to comments received at each stage of the consultation. The way in which the consultation process has informed the iterative design evolution of the Wylfa Newydd DCO Project is set out in the Design and Access Statements [APP-407 to APP-410].
- 1.3.5 The Planning Inspectorate (in their section 55 Acceptance of Applications Checklist) and IACC (in their adequacy of consultation response) concluded that Horizon's pre-application consultation was undertaken in accordance with requirements of the Planning Act 2008.
- 1.3.6 Following submission of the DCO application, Horizon has continued to develop SOCG with key stakeholders, and has held monthly Open Surgery events where members of the community can meet and put their questions to the Horizon team.

Radioactive waste and nuclear security

- 1.3.7 With regard to storage of radioactive waste and nuclear security: please refer to Horizon's Responses to **FWQ13.0.3** and **FWQ20.0.1** submitted at Deadline 2 (4 December 2018)

1.4 Concerns regarding the threats to local biodiversity

- 1.4.1 The potential impacts of the Project on ecological receptors has been assessed in both the Environmental Statements [APP-088 to APP-400] and the Shadow Habitats Regulations Assessment [APP-050 to APP-052] and [AS-010].
- 1.4.2 These assessments have been informed by (amongst other things) extensive modelling of the noise outputs of all the proposed construction works [APP-086 and APP-231], visual construction effects, construction phase water discharge, the air quality effects of construction plant, and marine traffic. The predicted results have been used in the assessment of ecological impacts. The assessments consider, in particular, effects on the Morwenoliaid Ynys Môn/Anglesey Terns SPA, the Bae Cemlyn/Cemlyn Bay SAC and the North Anglesey Marine/Gogledd Môn Forol SCI (in the process of being designated for Harbour porpoise) and have considered effects on prey stocks and availability as well as disturbance of marine birds and marine mammals.
- 1.4.3 These documents conclude that: for all these elements no significant residual impacts and no adverse effects on the integrity of any SPA or SAC designated features.
- 1.4.4 The assessment of impacts of the Wylfa Newydd DCO Project on Tre'r Gof SSSI is presented in chapter D9 [APP-128]. The assessment concludes that there will be minor adverse effects on Tre'r Gof SSSI as a result of air quality changes during construction and major adverse effects as a result of hydrological changes during construction and operation.
- 1.4.5 Horizon is proposing to take all reasonable steps to mitigate adverse effects on Tre'r Gof SSSI. With regard to hydrological impacts this would include the use of construction buffer zones and implementation of drainage and water treatment measures in an attempt to maintain the SSSI's baseline hydrological and hydrogeological regime. The predicted residual major adverse effect in spite of these proposed mitigation efforts is due to uncertainties inherent in predicting the response of such a complex and sensitive system and the associated good practice application of the precautionary principle.
- 1.4.6 As a result of being unable to rule out a major adverse effect on Tre'r Gof SSSI, Horizon is proposing to offset this potential effect via the creation of compensatory rich fen habitats similar to those which could be lost (see ES Chapter D Ecological Compensation Sites: Assessment of Environmental Effects [APP-137, APP-190, and APP-191]). The aim of Horizon's compensation proposals is to ensure no net loss of biodiversity in accordance with industry good practice.

1.5 Concerns regarding additional stresses on local public services

- 1.5.1 Please refer to Horizon's Responses to **FWQ10.1.3** submitted at deadline 2 (4 December 2018) which sets out Horizon's response with regard to the impacts on local public services.

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