

From: [REDACTED]
To: [Wylfa Newydd](#)
Subject: Written Representation
Date: 06 December 2018 00:29:12

I apologise for my late submission and hope it can be considered. I would like to make an oral presentation if this is possible

Below I have repeated my RR and expanded for my WR

Relevant Representation

I have concerns about the proposed development for the following reasons:

- 1 - cumulative impact of power station and pylon line on the environment
- 2 - grid connection not acceptable to the people of Anglesey
- 3 - the power station and grid connection should be a single programme not two projects
- 4 - no "cumulative consultation" for the power station and grid connection
- 5 - impact of cooling water outflow on the marine environment
- 6 - construction and operation of the MOF rather than using Holyhead harbour
- 7 - the CHP feasibility study has not fully explored new agricultural developments and has minimal audit trail
- 8 - NPS EN-6 assumes private finance and implementation by 2025
- 9 - NPS EN-6 did not consider the grid connection
- 10 - it's in the wrong place!

Written Representation

Impact of the overall project (power station and grid connection)

The Planning Act (2008) encourages developers to "bundle" all aspects of a programme of work into a single application. Horizon have done this to great effect, incorporating the power station, workers' accommodation, road infrastructure, cooling water supply, boiler feed-water supply etc into one application. With one exception – the export connection.

Within the whole programme, the connection costs less than 5% of total costs, even for an underground solution, and while the Act requires cumulative impact to be considered, cumulative cost is not.

EN-1 s4.9 considers the grid connection and s4.9.2 states "The Government therefore envisages that wherever possible, applications for new generating stations and related infrastructure should be contained in a single application to the IPC or in separate applications submitted in tandem which have been prepared in an integrated way"

The proposed grid development is not included in the application for the new generating station and there is no evidence that the two applications have been prepared in an integrated way. There has not been a combined impact assessment or a combined consultation, and while the two DCOs have been submitted by two separate legal entities, there is no reason why the two could not have been combined into a single DCO. Horizon and NGET have followed quite different consultation strategies so it is hard to envisage the two organisations working "in an integrated way"

EN-6 s3.14.1 states "Issues surrounding electricity transmission were not considered in the SSA [strategic site assessment] because not enough information was available to make an assessment at the strategic level and different applicants may come forward with different proposals without affecting the strategic suitability of the site for the purposes of the SSA"

This implies that the developer of the power station can come forward with proposals either for, or which can influence, the proposals for the grid connection, something that Horizon has failed (and in a private email, available if required, refused) to do. It is no secret that the people of Anglesey strongly oppose NGET's current "double pylon" proposal. Horizon have been very vocal rejecting the "best" option (subsea) and while being favourable towards a (compromise) buried connection refuse to engage with NGET to make this happen

I urge you to make these two organisations follow Government policy and work together such that the overall project (power station and connection) is acceptable

Location, MOLF and transmission corridor

Other potential locations are available on Anglesey for the power station that would result in less intrusive grid connections. If the power station were sited on the former Anglesey Aluminium site, there would be a natural transmission corridor following the A55 which could use various transmission technologies, as well as having a "ready built" harbour facility (MOLF), a conveyor system to the harbour and close proximity to all transport modes and worker accommodation locations. It would also make good use of a brown field site and avoid the planned green field decimation

Cooling water and CHP

It is well known that the discharge of cooling water at a raised temperature and containing chlorine are harmful to marine organisms in the immediate vicinity of the discharge point. It can only be assumed that at three times the generating capacity, the new station will have a far greater impact. Early proposals talked of a 3 km discharge pipe, but this has now been dropped

The waste heat in the cooling water will be exactly that - wasted - and there has been no consideration of making better use of this wasted, low carbon energy. The CHP study quickly ruled out the "typical" option of using waste heat for residential space heating, but there has been no evaluation of the feasibility of aquaculture, which in a coastal region would seem pretty obvious and would leave an embedded legacy

Waste heat may also be recovered from buried transmission cables but the opportunity is hampered by the industry structure. NGET have the cables and technology to recover the heat, but do not have a license to sell energy. Horizon could do this, if they were to work in an integrated manner with NGET to make it happen

I urge you to make Horizon consider these opportunities

EN-6

Throughout EN-6, it is clear that the Government's intent is that the development should be completely privately funded, with the development complete by 2025.

Should Wylfa Newydd require an element of State funding, then surely this falls outside the remit of EN-6, in which case under what policy is the development being pursued?

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Dr Jonathan F Dean



<https://you.38degrees.org.uk/petitions/anglesey-says-no-to-pylons>

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