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To: Wylfa@pins.gsi.gov.uk

Subject: Deadline 2 Submission Wylfa Site Assessment

Deadline 2 submission - Response to Examining Authority's Written Questions
registration identification number 20011136.

1) I question how Appendix 16a can be unquestionably accepted by the Inspectors, when evidence is unverified and unverifiable.

What criteria is to be used and where is it documented, to assess Appendix 16a when

a) there is no current NPS up to 2025? How can Horizon claim it can meet the new NPS when the consultation for criteria is not complete?

b) the government has not yet completed the DCO assessment on the nominated sites? On what basis can Inspectors accept Appendix 16a as relevant to the application?

2) I would submit that as a highly protected internationally designated site of ecological importance, where Horizon admits that

“At the strategic stage, it is sufficient to draw the same conclusion as the

original siting assessment, that long lasting adverse effects on the AONB are likely given the scale of the project.” (3.11.12, Appendix 16a)
the designations are sufficient to dismiss Horizon’s case.

Habitat Regulations Site Report for Wylfa -Summary Overview of Key Stages
Stage 4: Assessment where no Alternative Solutions Exist

“ If no alternative solutions exist, consideration should be given to whether the sites host priority habitats/species....

If IROPI are determined, then compensatory measures must be designed, assessed and put in place...”

As already stated, longlasting adverse effects on the AONB are likely, deeming compensatory measures inadequate.

Furthermore, since the withdrawal of both Toshiba from the Moorside project and the suspension of development by Hitachi at Oldbury, it is no longer the case that the government has no alternatives in relation to its choice of sites.

The IROPI for Wylfa no longer has the same status.

Appendix 16a states:

As in 2009, Exclusionary criteria are those that if breached would categorically exclude a site from further consideration

C7 - Internationally designated sites of ecological importance

Paragraph I.65 of Annex I notes that it would be preferable for sites to be nominated in areas unlikely to cause an adverse effect on the integrity of any internationally designated sites of ecological importance.

For these reasons I do not agree with Horizon's explanation of why it is reasonable to conclude that the site can be licensed, constructed and deployed by 2035, as set out in Appendix 16a

Linda Rogers



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