

From: [Pearson, John](#)
To: [Wylfa Newydd](#)
Subject: Wylfa Newydd Deadline 7 EN010007: Response from National Trust (20010995)
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Attachments: [image001.png](#)
[NT Wylfa Deadline 7 Response 2 pdf.pdf](#)
[Cemlyn Vision National Trust Addendum Deadline 7 Wylfa DCO.pdf](#)

Please find attached the response from National Trust (20010995) to deadline 7 of the Wylfa Newydd DCO Examination, together with the Addendum Cemlyn Vision. Thank you.

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Our Vision for the Cemlyn Estate

January 2017

Consultation document prepared in consultation with North Wales Wildlife Trust by John Pearson, Andy Godber, Bryn Jones, Gethin Evans, Kathy Laws, Helen Buckingham, Rachel Dolan and Richard Neale

Introduction

This document has been prepared following four years of analysis and planning, starting with our Anglesey Let Estate Review and Land Condition Assessment in 2013. It has also been informed by informal discussions with our tenants and conservation bodies, in particular the North Wales Wildlife Trust, Natural Resources Wales and RSPB.



Its purpose is to gain a shared vision with our tenants, neighbours and relevant bodies for the future of the Cemlyn estate.

The vision builds on the National Trust's Land Outdoors & Nature Programme (LON), with its vision... "for land and landscape that is: healthy, beautiful, rich in culture and nature, enjoyable - and productive as a result". The Cemlyn vision has been built around the segments of the LON circle shown here.

The need for this vision is clear. Of all our diverse properties all over Wales, Cemlyn poses some of the most complex environmental challenges. And yet, it is severely under-resourced and consequently both the land and buildings are in urgent need of improvements if they are to complement the quality of the natural environment. The management of soil, carbon, water, visitor enjoyment and historic fabric all require improvement, and the farming tenants struggle to achieve acceptable standards of husbandry.

Coupled with this challenge are those posed by climate change and sea-level rise. Tides already regularly cover the public car park and some of the farmland; when the expected 50- 100cm rise by 2100 is added, then not all the holdings may be commercially viable. These changes are already affecting the shingle ridge and lagoon (which is artificially maintained by a concrete weir); changes which will eventually threaten the ecology of the lagoon, including the internationally important tern colony.

Finally, and perhaps most challenging of all, is the fact that the Wylfa Newydd nuclear power station is being planned on adjacent land, raising many questions about the likely impacts of this decade-long construction project on the environmental, historic and scenic fabric of Cemlyn. Despite this, we are confident that once the aims set out in this vision are realised, the Cemlyn Estate will thrive, providing rich wildlife habitats, spiritual refreshment and economic benefits for many generations to come.

Description

The Cemlyn Estate was bought by the National Trust in February 1968 with Enterprise Neptune funds and with help from Anglesey County Council. It extends to 134.45ha (332.23acres) of agricultural land, including about two miles of coastline. The estate was pieced together in the 1930s by wealthy aviator, collector and naturalist Captain Vivian Hewitt with the intention of carrying out a large-scale 'rewilding' project. The plan started with the creation of the lagoon, but most of his ideas were never realised, due to the intervention of the Second World War.

The estate is made up of two farms, Ty'n Llan and Plas Cemlyn, both on old Agricultural Holdings Act tenancies, and two smallholdings on more recent Farm Business Tenancies, Tyddyn Sydney and Felin Gafnan.

The whole property is of high environmental and cultural value. It includes an internationally important tern breeding colony, established mainly due to the efforts of the North Wales Wildlife Trust who took on a lease of the lagoon in 1971. By now there are breeding populations of common, Arctic and sandwich terns (the latter being 20% of the UK population in 2015). The historic mill of Felin Gafnan, still includes most of its machinery in situ and significant sites of historic importance are adjacent or enclaved within the property. These include the delightful Cestyll Garden, Llanrhwydrus medieval church and graveyard, Bryn Aber, Captain Hewitt's home, and a monument to Anglesey's first lifeboat, which was stationed here.

An important aspect of the property is that it is highly vulnerable to the effects of sea-level rise and global warming. The worst-case 2 metre sea-level rise scenario is shown on the map below. The Shoreline Management Plan (November 2011) states that "*Under a 2m sea level rise scenario there is a significant increase in the area potentially affected by normal tidal flooding, including risk to various farms around the back of the lagoon and to the access roads.*" It sets the policy for this stretch of coast as *No Active Intervention*, and concludes "*The SMP2....strongly recommends as an action the need for the development of an appropriate integrated management plan...*"

Figure 1. (Over)

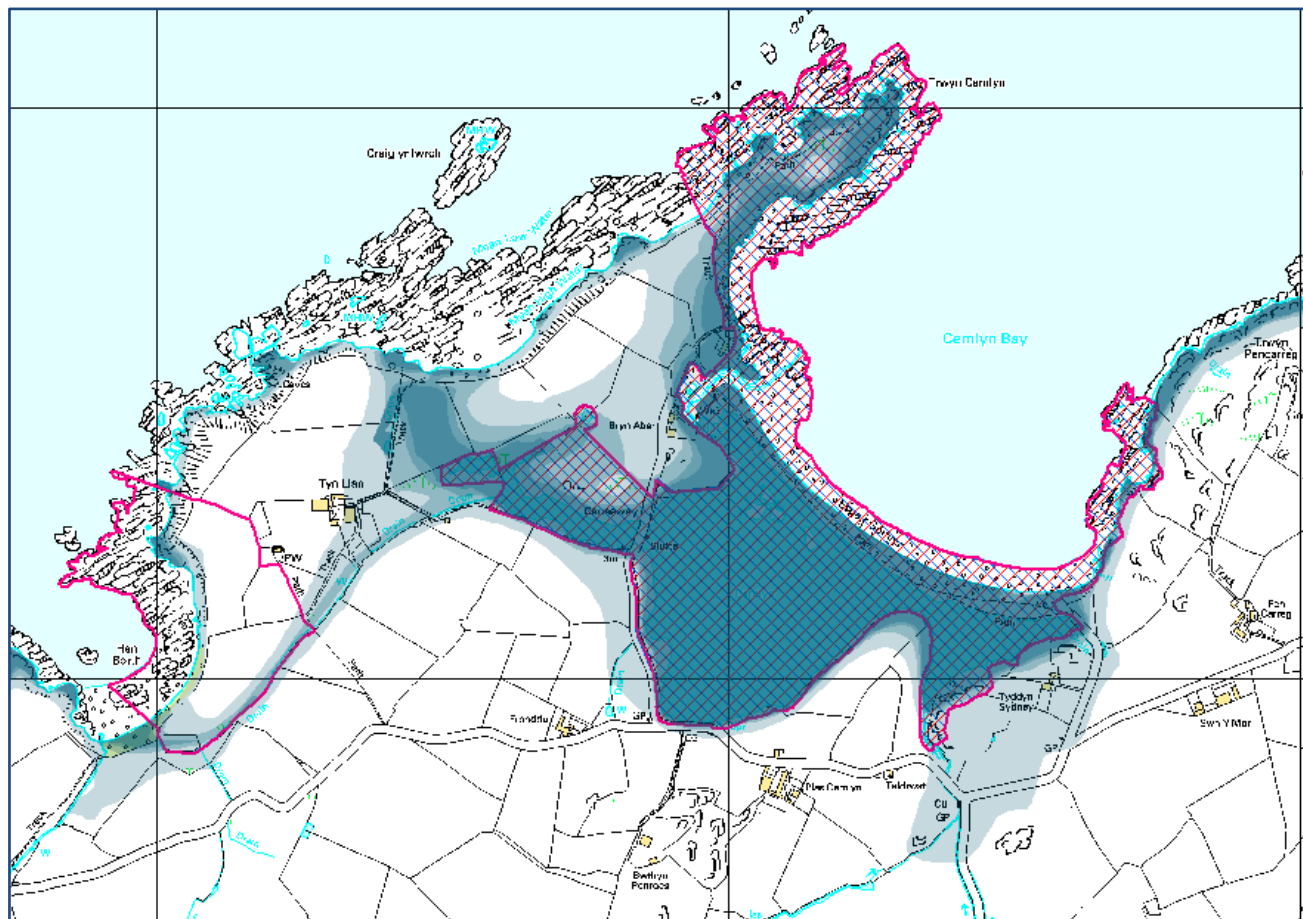


Figure 1. Cemlyn, with 2m sea-level marked in blue

The Context: The National Trust on Ynys Môn.

(Extract from the Ynys Môn Statement of Significance)

National Trust countryside properties on Anglesey are predominantly coastal and the majority are located along the wild and rugged North Coast; a remote and isolated part of Anglesey underlain by ancient rocks of pre-Cambrian age. Other important landmarks of the North Coast include Carmel Head, Mynydd y Garn, Ynys y Fydlyn, Dinas Gynfor (the Trust's first acquisition on Anglesey and the third overall, in 1913). All of the National Trust properties lie within the Anglesey Area of Outstanding Natural Beauty.

The island is still a stronghold of Welsh culture and agriculture and this aspect of our heritage is reflected in a number of the Trust properties, for example the important vernacular buildings and features of importance at Swtan, Felin Gafnan and Plas Cemlyn. There are still large areas of semi-natural habitats on National Trust managed land, in particular significant area of lowland heath which is a nationally rare and threatened habitat. In addition to the land on the North Coast there are important areas of heath under National Trust ownership at Fedw Fawr and Bryn Offa on the South East corner of the island. Nationally rare species include the spotted rock rose (at Clegir Mawr) and golden samphire (at Porth Dafarch). The drumlin features along the coast between Mynachdy and Cemlyn are nationally recognised features. There are scheduled ancient monuments at Porth Dafarch, Bryn Llywelyn and Dinas Gynfor.

Our Overarching Vision for Cemlyn

- The Cemlyn estate is a diverse and healthy ecosystem, where wildlife conservation is integral to public enjoyment and supports economically-viable and diversified agricultural tenancies.
- Cemlyn is an attraction for walkers and nature-lovers to explore the spectacular landscape and wildlife, providing a significant source of income to north Anglesey.
- Cemlyn's landscape, wildlife and way of life are shaped by the forces of nature. Coastal change is embraced and has guided our management decisions, such as the location of visitor facilities and farming practices.
- We have used our experiences of coastal adaptation and are working with conservation and academic partners to monitor change and provide inspiring educational experiences.
- We work in partnership with the North Wales Wildlife Trust and our farming tenants to achieve the vision for Cemlyn.

Our Vision for the CEMLYN

Ein Gweledigaeth ar gyfer CEMLYN

Cipolwg...

At a glance...



Ein Gweledigaeth ar gyfer CEMLYN

Bydd tirwedd, bywyd gwyllt a ffordd o fyw Cemlyn yn cael ei ffurfio gan y grymoedd naturiol.

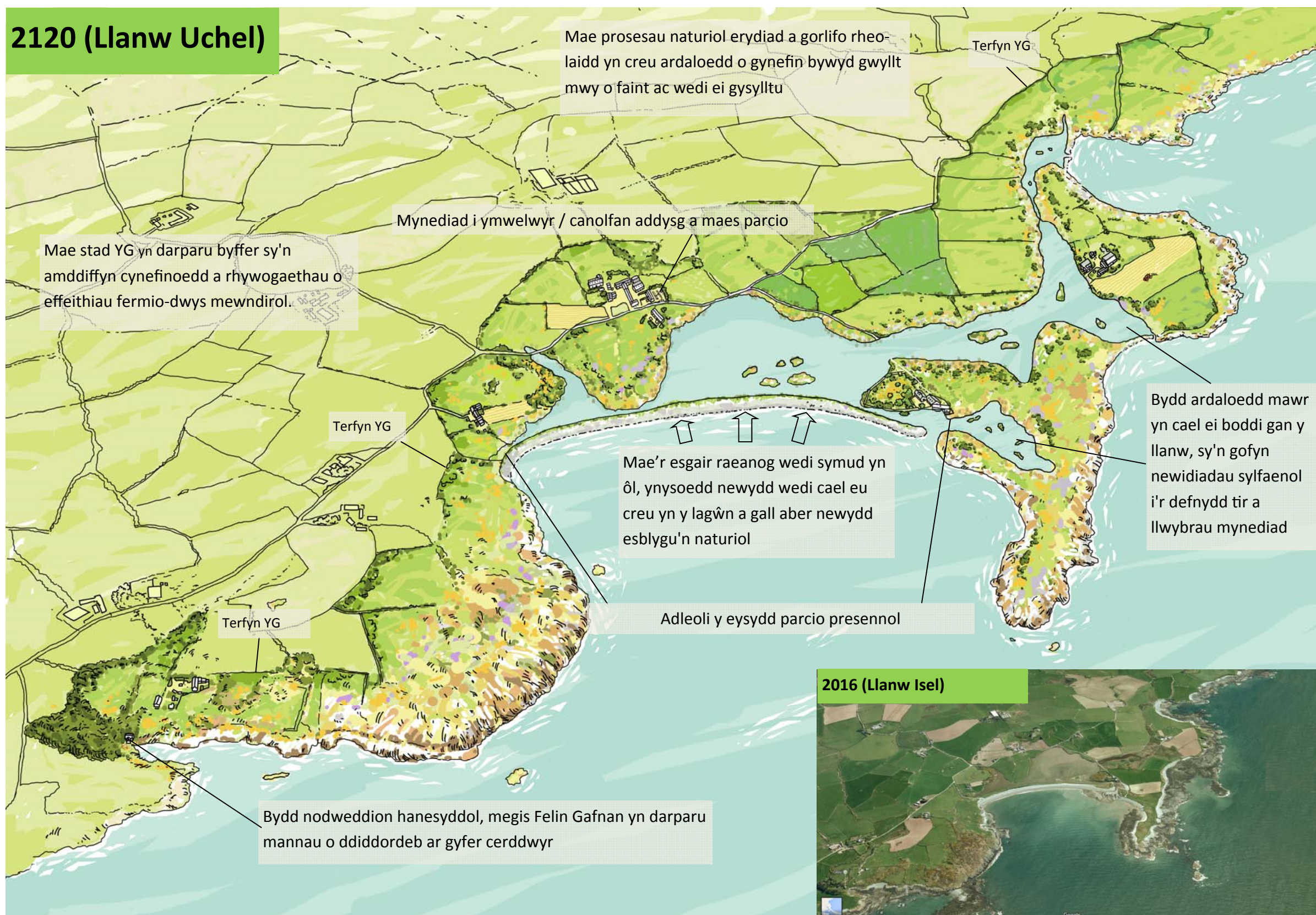
Bydd Cemlyn yn ardal eithriadol o gyfoethog i fywyd gwyllt. Bydd yn denu naturiaethwyr o bob cwr o'r byd ac yn dal i gael i gynnig bywoliaeth i deuluoedd ffermio.

Bydd llanw uchel yn gorlifo'r tir yn rheolaidd, gan ffurfio dwy ynys mawr, a llawer o rhai llai. Ar lanw isel, bydd ardaloedd o ddŵr agored yn parhau, ond bydd llawer o'r tir yn morfa heli, yn fyw gyda seiniau o adar môr ac adar hirgoes.

Bydd y morfa heli yn cael ei amgylchynu gan ardaloedd helaeth o wely cyrs, prysgwydd a thir pori garw. Bydd llethrau nesaf at yr arfordir ac y lagŵn yn gymysgedd o rostir, prysgwydd eithin a thir pori garw.

Bydd Esgair Gemlyn wedi symud yn ôl tua 12 metr ac yn achlysurol yn cael eu gorlifo gan stormydd. Bydd y lagŵn heb ei lygru gan maetholion o'r ffermydd cyfagos a bydd o mewn cyflwr gorau posibl ar gyfer amrywiaeth o fywyd gwyllt dyfrol a daearol, ac yn cynnwys ynysoedd newydd a ddefnyddir fel nythfa i môr-wenoliaid.

Bydd teuluoedd ffermio yn gwneud bywoliaeth drwy reoli cynefinoedd, cynnig gwasanaethau ymwelwyr, ynghyd â magu da byw a ffermio tir â sy'n fuddiol i adar tir fferm, peillwyr a mamaliaid gwyllt.



Nodyn: Mae'r argraff-arlunydd hwn yn awgrym o sut y bydd y dirwedd yn edrych dan llanw mawr gwanwyn (1m uwchben presennol), heb unrhyw gyfyngiadau naturiol neu o waith dyn ac nid yw'n cynnwys adeileddau sy'n gysylltiedig â Wylfa Newydd

Our Vision for CEMLYN

Cemlyn's landscape, wildlife and way of life will be shaped by the forces of nature.

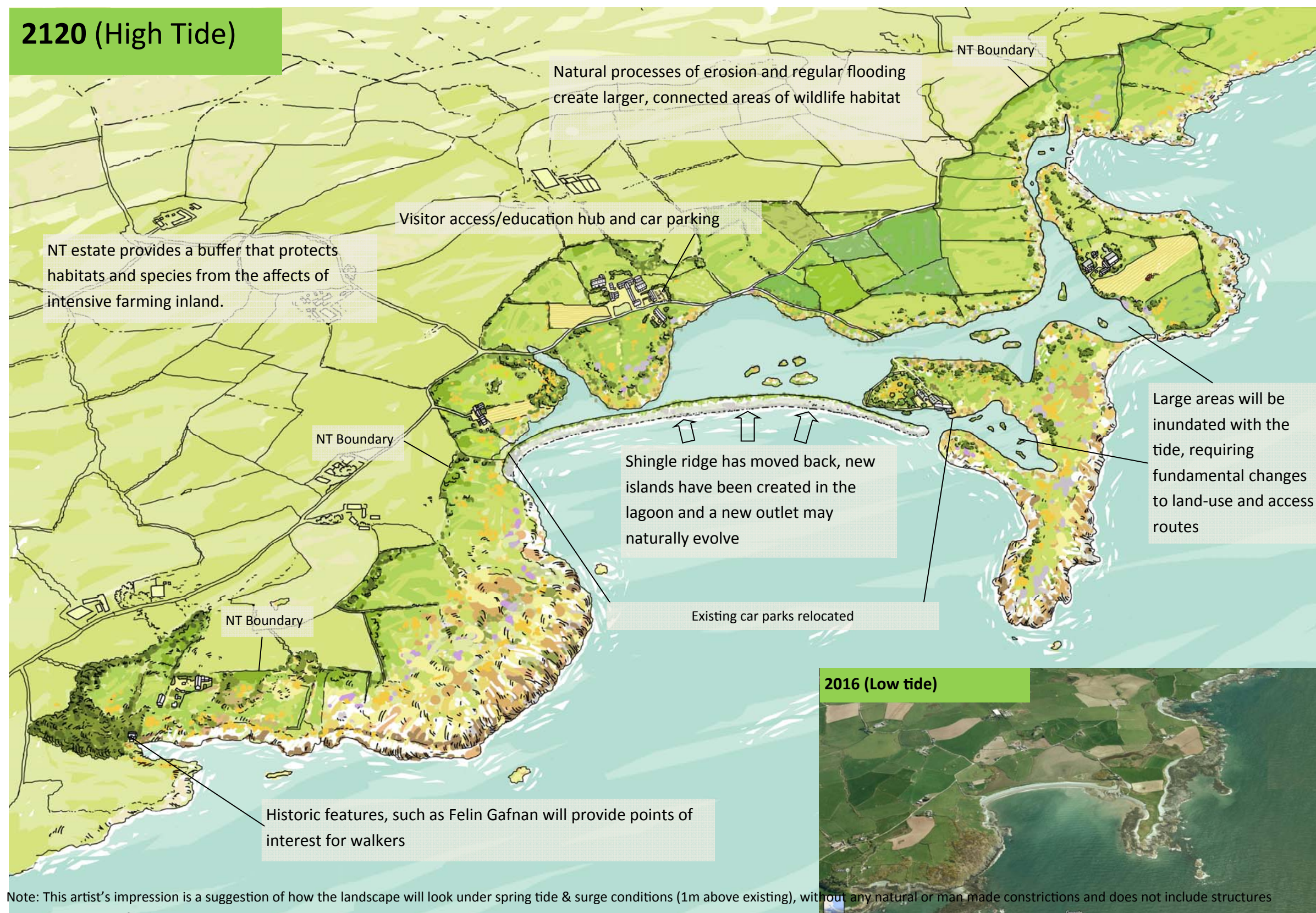
Cemlyn will be an exceptionally wildlife-rich area. It will attract wildlife enthusiasts from all over the world and will still provide a living for farming families.

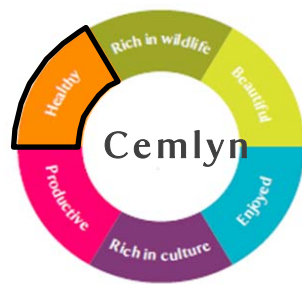
High tides will regularly flood inland, effectively forming two large tidal islands and many smaller ones. At low tide, areas of open water will remain, but much of the land will be salt marsh, alive with the sounds of seabirds and waders.

The tidal salt marsh will be surrounded by large areas of reed bed, scrub and rough pasture. Slopes next to the coast and lagoon will be a mixture of heath, gorse scrub and rough pasture.

The shingle ridge will have moved back around 12 metres and will occasionally be overtopped by storm surges. The lagoon will be unpolluted by nutrients from the neighbouring farms and will be in optimum condition for a diversity of aquatic and terrestrial wildlife, including newly created islands used by nesting terns.

Farming families will make a living from habitat management, visitor services, combined with livestock and arable farming that benefits farmland birds, pollinators and wild mammals.





Healthy

The Cemlyn Estate has many challenges to overcome before we can achieve our vision for a healthy, robust and ecologically-functioning environment. The condition of the soil and vegetative carbon generally needs improving; water is vulnerable to threats that could compromise its ability to support wildlife and many farm buildings are not fit for purpose. The dynamics of the natural shingle ridge are compromised by car park infrastructure and the farm businesses are not yet resilient to climate change and sea-level rise.

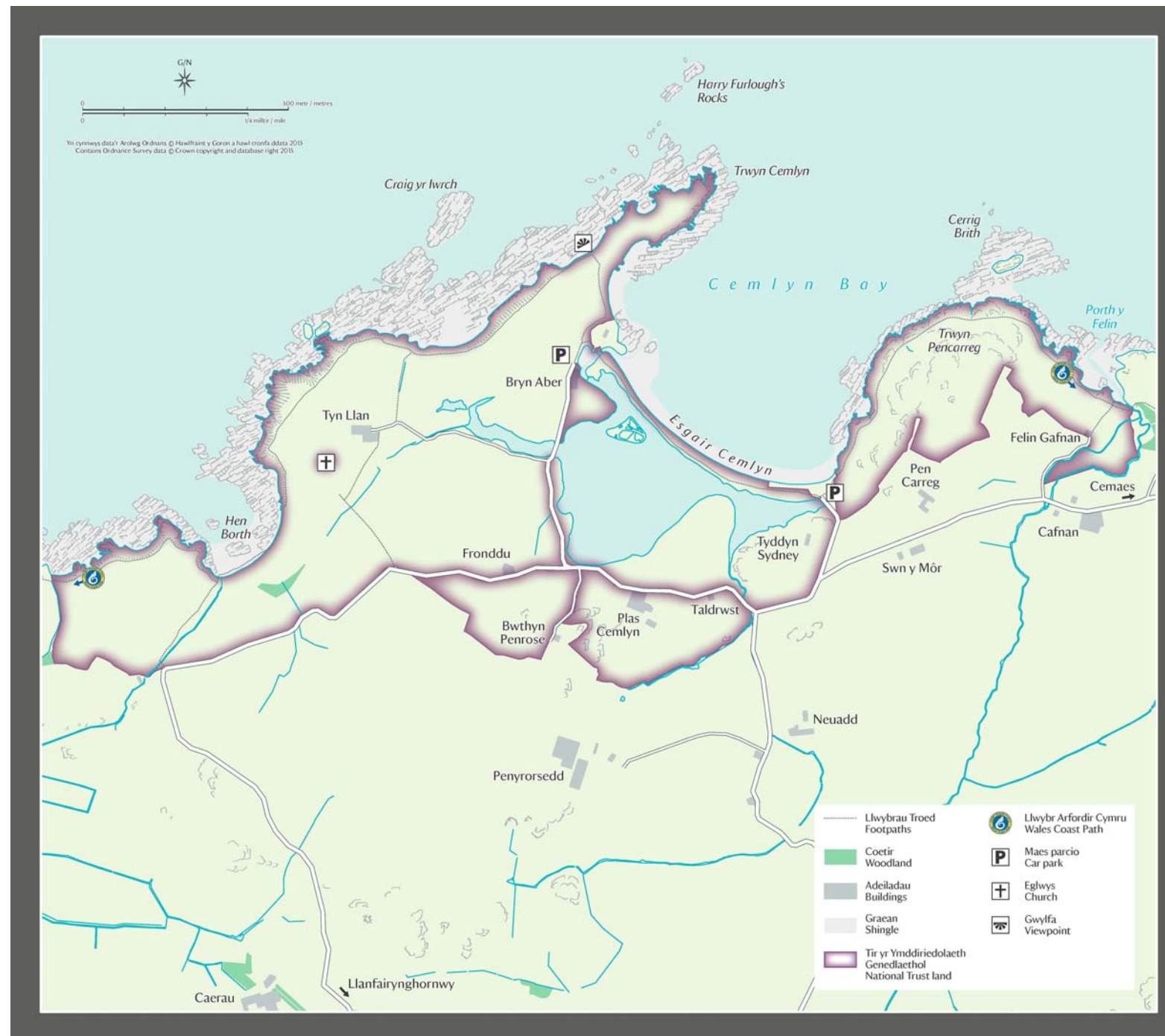


Features of importance:

1. Dynamic features including the shingle ridge, lagoon, soft cliffs, watercourses, ponds and areas of semi-natural vegetation.
2. Exceptional wealth of biodiversity, in particular bird life.
3. Mixed farming systems with sheep, beef cattle, hay meadows, permanent pasture and spring- and winter-sown cereals.

Potential threats:

1. Climate change, sea-level rise and storm surges is impacting on infrastructure and will eventually compromise the viability of Ty'n Llan as a conventional farming unit.
2. Water quality threats through livestock access to water courses and external storage of manure at Ty'n Llan, Plas Cemlyn and Tyddyn Sydney.
3. Lack of livestock housing/inappropriate use of housing resulting in out-wintering livestock at Plas Cemlyn
4. Nutrient rich run-off from yards at Plas Cemlyn
5. Buffers such as stone walls and hedges being lost resulting in increased risk of soil and water run-off.



Main Actions:

- A. Deliver a Coastal Adaptation Strategy with our tenants and partners to guide our responses to sea-level rise and climate change
- B. Develop and deliver a comprehensive Land Choices Assessment, leading to:
 - All farmed land being under agri-environment schemes, and ending the out-wintering of large numbers of cattle
 - Improved protection of soil and water through Manure Management and Nutrient Management plans
 - No-input buffer-zones around arable crops adjacent to watercourses, banks and other environmental features



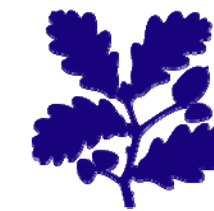
Our Vision for a Healthy Cemlyn

The Cemlyn estate is resilient to climate change and adapted to accommodate sea level rises and storm surges. Good farming practices and appropriate land-use ensures soils with a stable structure, good organic matter content and no erosion or compaction. The water in all the watercourses, ponds and lagoon is clean and supports thriving wildlife. Farm infrastructure is appropriate for the farming needs and is compliant with regulations.



Rich in Wildlife

Cemlyn has a rich mix of habitats sustaining a variety of important species. Thanks to four decades of conservation work by the North Wales Wildlife Trust, the lagoon and shingle ridge are of international importance for the tern colony, ridge vegetation and brackish water invertebrates. Other areas of open freshwater, reed bed and farmland marsh are valuable for wetland birds. The shallow soils of Trwyn Cemlyn and Trwyn Pencarreg support a mosaic of coastal heath and grassland, and two small flower-rich hay meadows have survived at Felin Gafnan. The low input arable fields at Ty'n Llan provide important forage ground for farmland and over wintering birds.

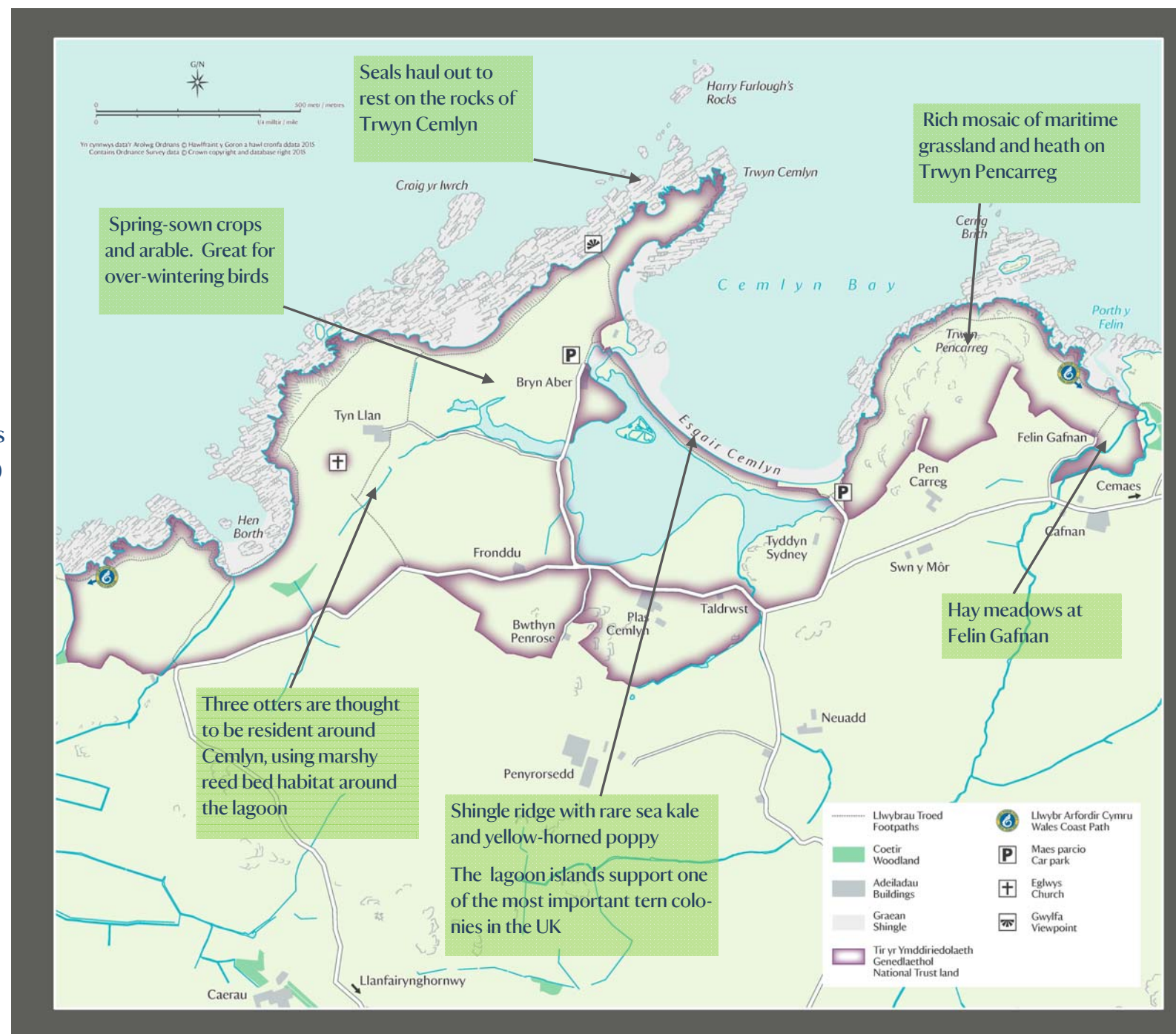


Features of importance:

1. Cemlyn Lagoon - SSSI, SAC, SPA & NWT Reserve
1. Henborth Geological SSSI—drumlins
2. Shingle ridge with sea kale
3. Breeding tern colony
4. Maritime grassland, and heath
5. Cliff and crevice communities
6. Foraging habitat for chough
7. Flower rich hay meadows
8. Fresh water marsh and streams
9. Spring sown cereals with arable flora and foraging for farmland and over wintering birds
10. 50 years of wildlife observations (NWT etc.)

Potential threats/issues

1. Poor water quality - nutrient enrichment of freshwater streams and marsh and potential impacts on lagoon biodiversity. Limited buffer areas. Point-source and diffuse pollution, possibly including pesticide residues.
2. Disturbance, predators and changes to lagoon islands threaten tern colony
3. Fragmentation of habitats—marsh, heaths and grasslands
4. Lack of grazing of coastal areas and impacts on vegetation and chough feeding ground
5. Loss of low-input spring-sown cereals
6. Loss of hay meadow management in preference for intensive silage production.
7. Trampling & foraging of sea kale of the shingle ridge
8. Potential construction impacts from Wylfa



Main Actions:

The impacts of coastal change on key species will be evaluated, and where loss is envisaged, we will work with our partners to deliver mitigation measures which ensure the overall survival of these species.

BETTER:

- A. Review and implement a transition to 'high nature value' farming on the holdings, so improving diversity of the grassland mosaic and establishing hay meadows and small scale arable farming.
- B. Address water quality issues with the establishment of effective buffers and restoration of riparian habitats which support otter and water vole.
- C. Establish mixed grazing on coastal habitats for better management and species composition.

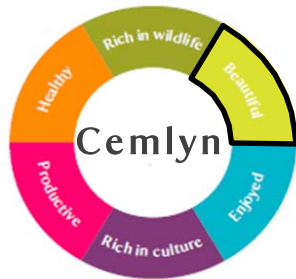
BIGGER & MORE JOINED UP

- A. Implement management and habitat creation projects to maximise the potential for wildlife, with a key focus on the development of a transformed landscape of transitional habitats from saline intertidal saltmarsh, through reedbeds to wooded valleys.
- B. Farmland and coastal habitats to be an integral part of the ecosystem, supporting strong and resilient numbers of key species, such as chough, tern and water vole
- C. The site will be managed in partnership with the NWT to ensure a healthy tern population, with additional nesting sites and wetlands created which mitigate impacts of coastal change on the lagoon and shingle ridge.



Our Vision for a Cemlyn Rich in Wildlife

There is a rich mosaic of habitats, heaths, grassland and marsh shaped by the natural processes of erosion and seasonal flooding. These building-blocks are intricately connected by swathes of rich semi-natural vegetation, alive with insects, birds, mammals and amphibians. The treasures of this wonderful coastal landscape: the hay meadows, maritime grasslands, heaths and intertidal habitats such as saltmarsh, are in good ecological condition managed through a strong partnership with the Wildlife Trust that enables the habitats to function naturally and key species to flourish. We recognise that climate change may have negative impacts on habitats and species, so we aim to secure the best outcome for intermediate stages that might persist for long periods.



Beautiful

Cemlyn lies within the Anglesey Area of Outstanding Natural Beauty and the North Anglesey Heritage Coast. Its beauty is largely a product of natural processes, enhanced by farming and visible features of cultural significance from the medieval period to the present day.



Features of landscape importance:

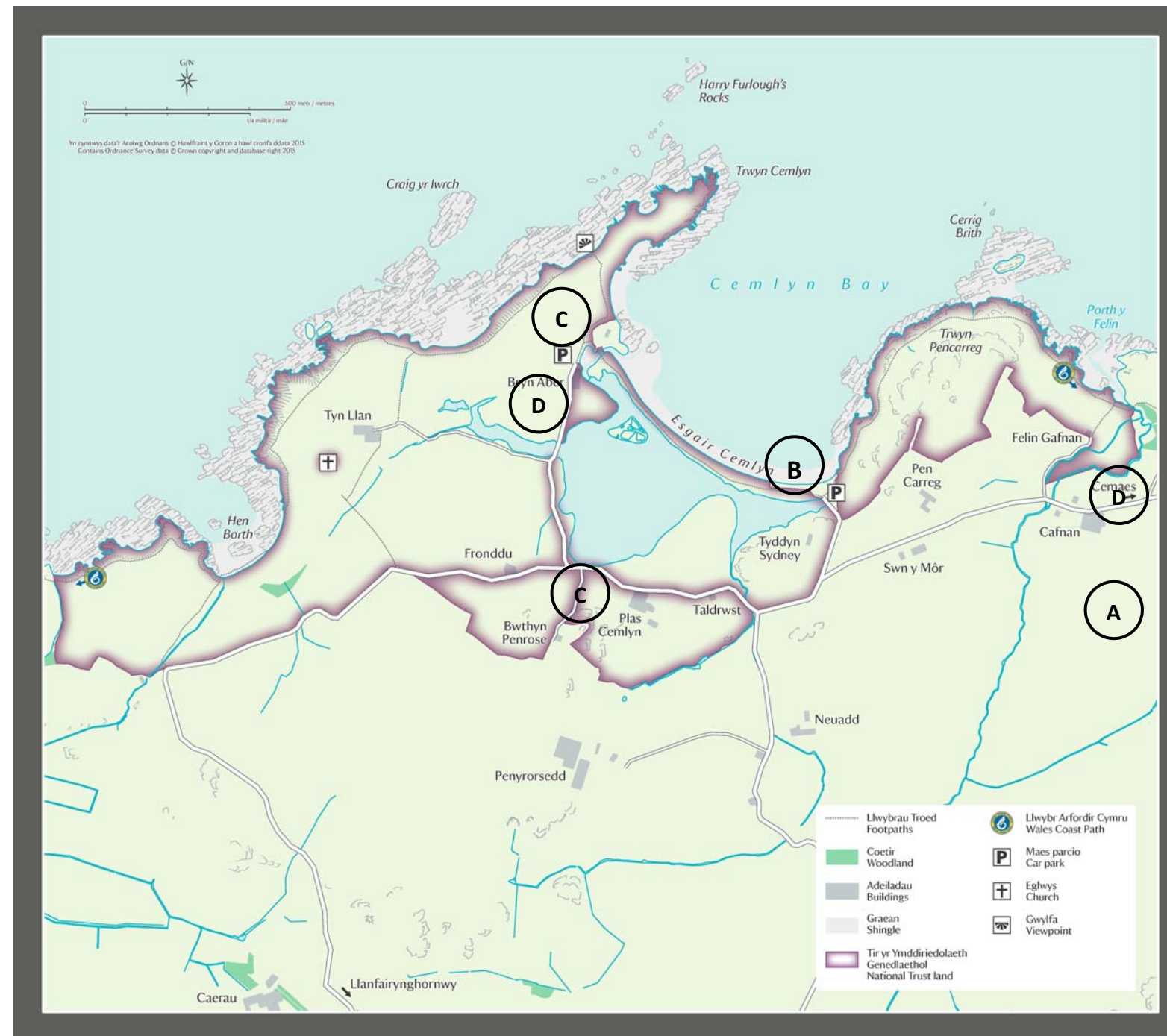
1. Esgair Gemlyn shingle ridge and lagoon
2. Varied stretch of rugged 'natural' coastline
3. Traditional field patterns and boundaries
4. Cestyll Garden (Non-NT)
5. Historic, largely vernacular, buildings, including: Bryn Aber & Outbuildings (Non-NT), Felin Gafnan, Tyddyn Sydney, Plas Cemlyn, Ty'n Llan.
6. Observable wildlife, such as the tern colonies and wild flowers.

Intrusive features that compromise the beauty of Cemlyn include:

1. Views to the east are dominated by the nuclear power station and associated developments
2. Farming activities are generally complementary to the landscape, however a number of eyesores and examples of poor husbandry can mar an otherwise harmonious landscape.
3. Many of the buildings are in poor condition and/or derelict, and these detract from the landscape quality.
4. The current location of the two car parks can diminish the landscape quality, especially on busy days.

Potential threats to the landscape quality:

1. Insensitive development of Bryn Aber and associated buildings, and Cestyll Garden
2. Developments associated with construction of Wylfa Newydd.
3. Continued poor maintenance of farm buildings and unsightly farming practices.



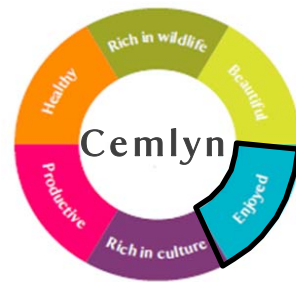
Main Actions:

- A. Work with Horizon / Wylfa Newydd to ensure that the construction impacts are minimised and that the final landscaping complements the landscape value of Cemlyn.
- B. Close the east car park, remove infrastructure from the shingle ridge and return to 'natural' state.
- C. Relocate the west car park to a screened location at Plas Cemlyn and re-landscape the old car park for pedestrian use.
- D. Maintain contact with owners of Bryn Aber and Cestyll Garden and influence future development.



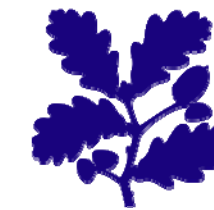
Our Vision for a Beautiful Cemlyn

Cemlyn is the foremost location to experience the rugged scenery of the North Anglesey coast. It's extraordinary beauty is largely the result of natural, dynamic processes. As the climate changes, storms, floods and tidal inundations have created large areas of rough grazing which add colour, texture and wildlife to the agricultural landscape. Buildings are well maintained and add historic interest to the landscape, and farm husbandry enhances the natural beauty. Visitor facilities such as car parking and welcome signage are confined to one well-screened location at Plas Cemlyn. Despite its proximity, the new nuclear power station is barely noticeable to anyone at Plas Cemlyn, the shingle ridge and Cestyll Garden, proving that with sensitive planning, industry and beauty can coexist in harmony.



Enjoyed

The Cemlyn Estate's has given pleasure to generations of nature-lovers and walkers, drawn by its exceptional wildlife, culture and outstanding landscape. It is estimated that about 30,000 visitors visit the site each year, which is traversed by one of the most popular sections of the Wales Coast Path. The North Wales Wildlife Trust employs a seasonal warden to meet visitors. There are two car parks (one NT) both of which are in problematic locations, being inundated by the tides. Circular walks take in the lagoon, Trwyn Cemlyn, Llanrhwydrys church, Felin Gafnan and views of Cestyll Garden and a joint NT-NWWT visitor welcome panel has been fitted in one of the car parks.

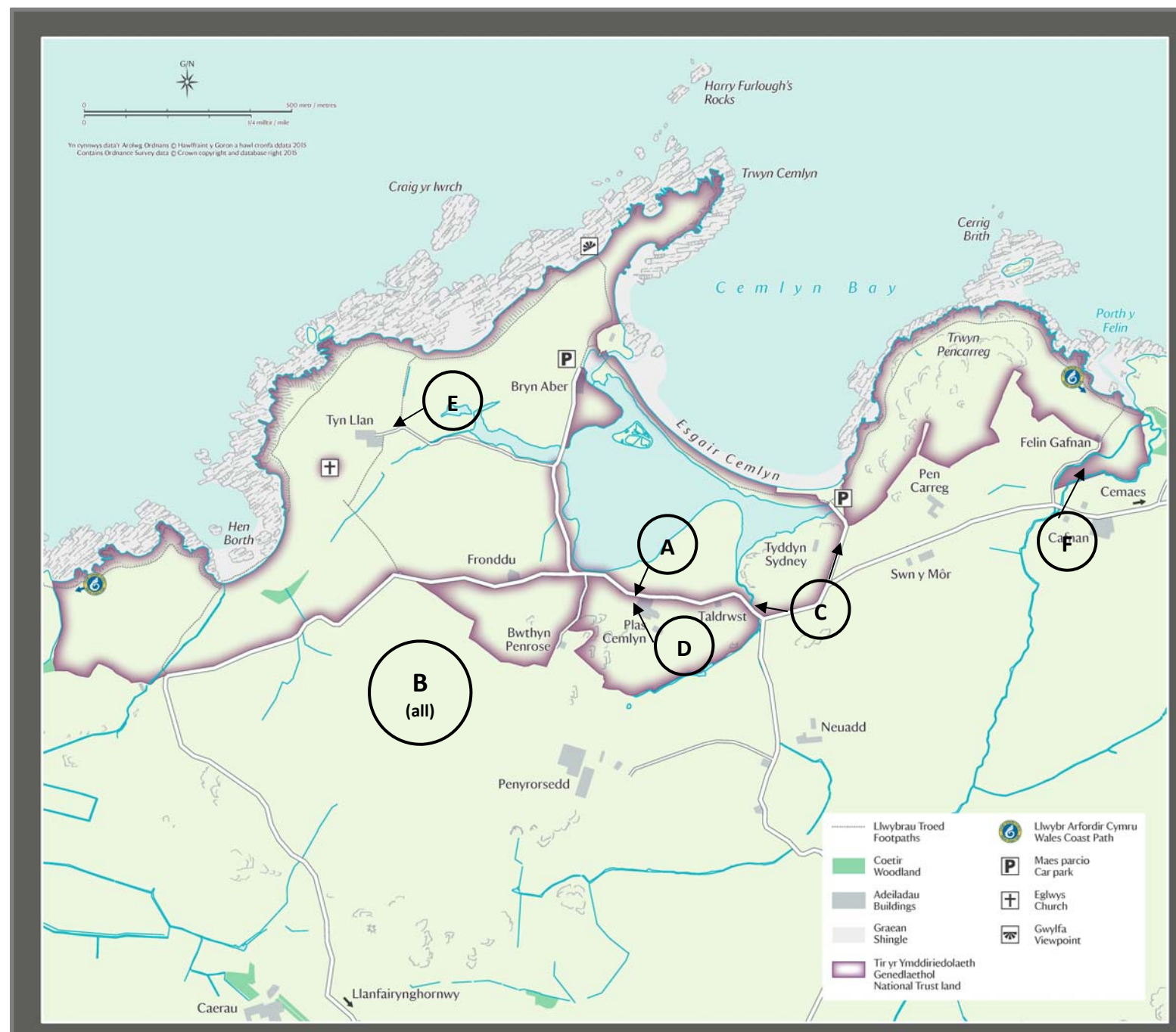


Features of importance:

1. North Wales Wildlife Trust seasonal wardens are on site in summer.
2. The Wales Coast Path runs through the site.
3. The nesting tern colony is a key draw to Cemlyn and the site is also famous for its geology, glacial features, shingle ridge and lagoon.
4. The site is enjoyed by sea kayakers circumnavigating Anglesey or for setting out to the Skerries.
5. Cemlyn is currently on the National Cycle Route 5.
6. Two car parks—free of charge.
7. Historic interest—the Church, Felin Gafnan and Cestyll Garden being of particular interest.

Potential threats:

1. Coastal erosion and inundation will impact on the line of the Wales Coast Path and shingle ridge.
2. Existing inland paths will become increasingly muddy and will need to be diverted from wet and ecologically sensitive areas.
3. Coastal erosion and higher tides already affect both car parks
4. The construction of the nuclear power station will cause the closure of footpaths adjacent to NT land.
5. Disturbance of birds and mammals and vegetation through increased numbers of visitors, including dog walkers and adventure sports enthusiasts.



Main Actions:

- A. Develop new visitor/education hub at Plas Cemlyn including the relocation of car parking, visitor welcome and associated facilities from the two existing locations.
- B. Improve network of paths, forming easily accessible circular routes.
- C. Divert the coastal path around the southern flank of the lagoon to avoid erosion and wildlife disturbance and consider erecting bird hides with information and seating.
- D. Support new educational programmes with material to aid the study of coastal adaptation, climate change and geology (with NWWT & Geo-Môn).
- E. Investigate camping and/or bunkhouse facilities at Ty'n Llan with tenant.
- F. Liaise with Horizon on the future of the Cestyll Garden and develop as visitor attraction if possible.



Our Vision for a Cemlyn Enjoyed by the local community and visitors

Cemlyn is a popular year-round visitor hub for the enjoyment of nature and culture. It's excellent network of easily accessible walks leads walkers to a choice of nature-watching vantage points and historic points of interest. Visitors are inspired to explore the ecology, geomorphology and history through an informed welcome and stimulating interpretation, at the new hub at Plas Cemlyn and local schools and colleges are frequent visitors. Low-key farm-based accommodation with locally-distinct catering enables visitors to engage more deeply with the landscape and the local way of life.



Rich in Culture

The Cemlyn Estate has its origins in the medieval period. Felin Gafnan is mentioned in the Extent of Anglesey of 1352. St Rhwydrys Church (not NT) is first mentioned in the Norwich Taxation of 1254. However, nearby discoveries of Prehistoric and Roman sites point to much earlier occupation with the potential for buried archaeology across the estate being high. Continued farming activities across the estate have retained traditional farm boundaries crucial to its historic landscape character. Vernacular buildings, including farm buildings, dwellings and the corn mill, are also significant to its historic landscape character.

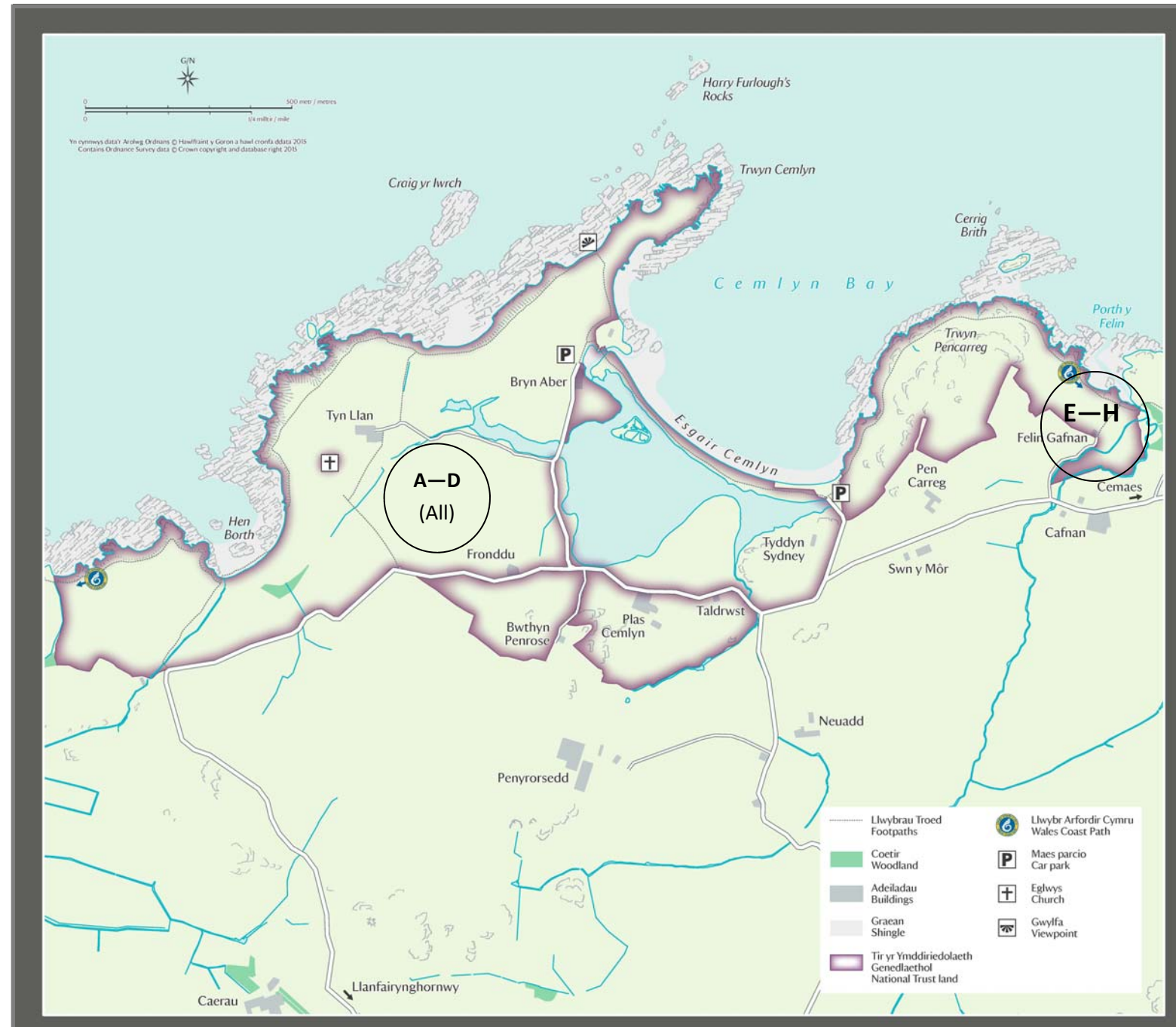


Features of importance:

1. The historic character of the traditional field boundaries, both clawdd banks and dry stone walls.
2. Felin Gafnan, (Grade II* listed) and associated features, farm house, corn dryer and landing places at Porth Gafnan.
3. St Rhwydrys medieval church, Grade II* listed (not NT).
4. Vernacular buildings at Plas Cemlyn, all Grade II listed.
5. High potential for buried archaeology of different periods.
6. Cestyll Garden, Grade II Registered Garden (not NT).

Potential threats:

1. Coastal erosion and inundation of buildings and other features.
2. Developments associated with Wylfa Newydd. Affecting particularly Felin Gafnan and associated features.
3. Continued poor maintenance of vernacular buildings and traditional field boundaries.
4. Inappropriate farming activities.
5. Access infrastructure (e.g. new car park)



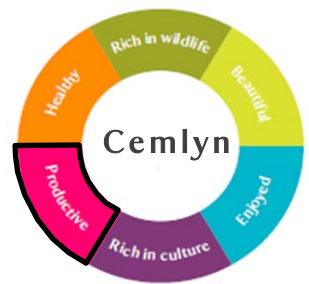
Main Actions:

- A. Undertake a traditional boundary restoration scheme across the estate. And develop a management regime which provides for the longer term maintenance.
- B. Understand what will be lost through sea level rise and undertake archaeological recording.
- C. Develop a plan for investigation of potential below-ground archaeological features.
- D. Undertake a full structural survey and evaluation of risks associated with Wylfa development and sea level rise on Felin Gafnan.
- E. Develop a plan for the long term stability of Felin Gafnan.
- F. Assess potential areas for infrastructure re-location for cultural significance.
- G. Explore the possibilities for the acquisition of Cestyll Garden.



Our Vision for a Cemlyn Rich in Culture

It is possible to visit Cemlyn and understand and appreciate the historic landscape and how it has developed over time. Archaeological and historic sites, traditional farm boundaries and vernacular buildings are retained and well managed and we fully understand the potential for as-yet undiscovered sites. Key areas of interest such as Felin Gafnan and Plas Cemlyn attain their full potential both in terms of conservation and interpretation of historic features and of adaptive re-use.



Productive

The Cemlyn estate comprises two farms and two small-holdings producing beef, lamb, poultry, honey, eggs and arable crops. They currently face a number of threats in the form of declining farm incomes, erosion, flooding and impacts associated with the construction of the adjacent Wylfa Newydd nuclear power-station. The condition of the buildings and much of the land is poor and requires significant investment.

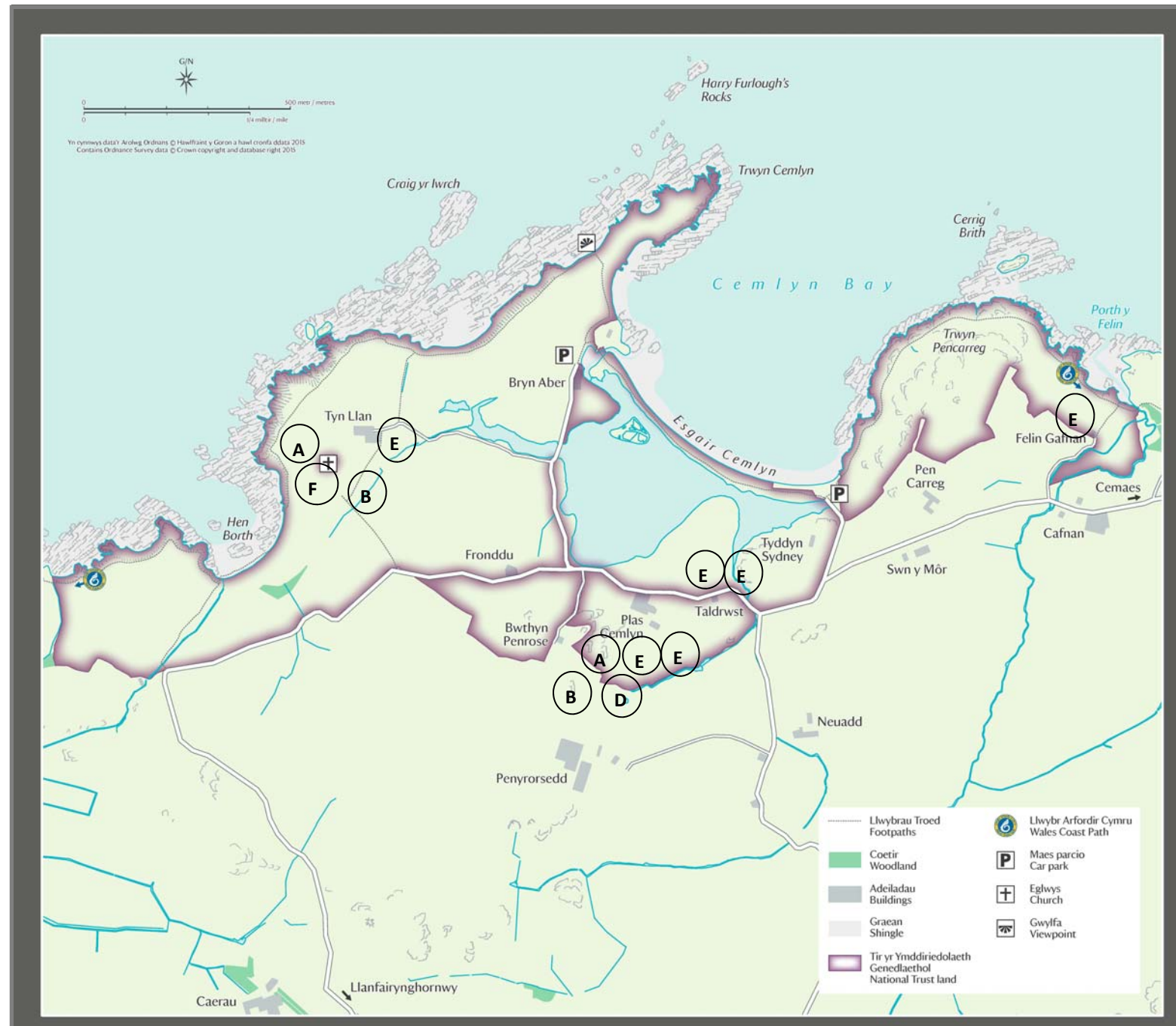


Features of importance:

1. Mixed farming practices of livestock and arable crops.
2. Farm livestock comprising sheep and beef enterprises and smallholding products of beef, poultry, eggs and honey.
3. Hay meadows and permanent pasture
4. Traditional stone and hedge boundaries.
5. Potential for diversification through tourism, additional agri-environment

Potential threats & barriers:

1. Sea level rise affecting ability to sustain crops and livestock at Ty'n Llan.
2. Lack of investment in farming infrastructure, especially manure storage and livestock housing.
3. Vernacular buildings in poor condition, requiring a significant investment to make safe and ensure no further degradation.
4. Increased pressure on farming businesses due to reduction in income from livestock, crops and subsidy.



Main Actions:

- A. Improvements to farm buildings to enable improved agricultural management and diversification.
- B. Investigate options for renewable energy
- C. Enable uptake of agri-environment schemes
- D. Take management of vernacular buildings in-hand at Plas Cemlyn.
- E. Investigate options for diversification to maintain economically-sustainable holdings.
- F. Support businesses by planning for the challenges of sea-level rise and climate change.



Our Vision for a Productive Cemlyn

Cemlyn supports thriving rural businesses which benefit from the wildlife, beauty and culture of the area.

As well as benefiting from agri-environmental conservation farming, the businesses also supply quality food products and tourism accommodation. The businesses are exemplars of resilience to climate change, having progressively adapted their systems and products over time.

EN010007

RESPONSE BY NATIONAL TRUST (20010995)

ISSUE: Deadline 7 Response

1. INTRODUCTION

1.1 This response is provided by National Trust (NT) to issues raised at the Issue Specific Hearings on Monday 4th March 2019; Wednesday 6th March 2019 and Friday 8th March 2019. The totality of the response is fully endorsed by North Wales Wildlife Trust. A coordinated response has been provided in response to issues by the Environmental Non-Governmental Organisations (eNGO's). A separate and detailed response from eNGO's has been provided in relation to Anglesey terns SPA under separate cover.

2. ISSUE SPECIFIC HEARING MONDAY 4TH MARCH 2019

2.1 LANDSCAPE AND VISUAL

2.1.1 Construction Photomontages

2.1.1.1 The preparation of the construction photomontages is welcomed. It is unfortunate that Horizon have chosen to leave it to the last stage of Examination in order to provide this detail. This information was requested by NT at pre application, and considered unnecessary by Horizon. We welcome in particular, the construction photomontage from Viewpoint (Vp) 27 the view east from Wales Coast Path near Cerrig Brith. As well as being on the Wales Coast Path (WCP) this viewpoint is from the AONB and from NT land. This viewpoint, which looks across Porth-y- Pistyll, encompasses the group of heritage assets, Felin Gafnan Farm House, the Corn Mill and Cestyll Gardens, and enables an appreciation of their relationship to each other.

2.1.1.2 The photographs from Vp 27 included all these assets in [APP-195] ES 6.4.61 ES Volume D - WNDA Development App D10-4 - Representative viewpoints and were shown over two pages. However, the operational photomontage in [APP-199] 6.4.65 ES Volume D - WNDA Development App D10-8 - Photomontage views only included a single page, choosing the centre of the two pages previously shown and omitting the heritage assets on the right hand side of the view and the full extent of the MOLF on the left hand side.

2.1.1.3 It is only with the latest construction photomontages, requested by the ExA that we can see the full extent of the changes in this area. In [REP6-019] Deadline 6 Submission - Illustrative Construction Visualisations it has been necessary to use 3 pages in order to encompass the full extent of the construction works from this viewpoint. The photomontage labelled 27.1 shows

the full extent of the MOLF although it does not include the temporary causeway which would be located in the foreground of this view.

2.1.1.4 In the photomontage labelled 27-2 we see the right hand side of the original representative viewpoint 27 with Felin Gafnan, the Mill and Cestyll Gardens. This is the only viewpoint provided from which the relative scale of these existing features compared to the scale of the development, particularly the two buildings closest to the heritage assets would be appreciated. We still do not have an operational photomontage to illustrate the development in relation to the heritage assets when viewed from this location.

2.1.2 Residential Amenity

2.1.2.1 As well revealing the relationship between the Heritage Assets, the construction works and some of the operational buildings, Vp 27 in [REP6-019] Deadline 6 Submission - Illustrative Construction Visualisations enables an appreciation of the relationship between the residential property of Felin Gafnan, the construction works and some aspects of the operation.

2.1.2.2 We welcome the ExA's request for photomontages from Vp 38 which would represent the view from the front of Felin Gafnan and the view that will be available to the residents of Felin Gafnan. We have been requesting photomontages from this location for two years. We have requested them as part of a residential visual amenity assessment (RVAA) in Section 5.2 of [Rep2-317] Written Representations Landscape and Visual Issues on behalf of the National Trust.

2.1.2.3 We do not accept the position put forward by HNP at the ISH on 4/03/19 that an assessment of residential visual amenity is not required because 'there is no right to a view'. Appendix 2 of [Rep2-317] Written Representations Landscape and Visual Issues on behalf of the National Trust contains a Background Document from the Landscape Institute (Appendix 1 to Draft Guidance of Residential Visual Amenity Assessment). This Appendix sets out how potential adverse effects on the visual residential amenity of occupiers of residential properties located close to proposed large scale development have been a consideration in the determination of major planning applications. This has been in relation to a wide range of developments including major road and rail infrastructure as well as energy developments.

2.1.3 Wales Coast Path

2.1.3.1 At the ISH on 4/03/19 the rerouting of the WCP was raised and the failure of Horizon's Rights of Way (RoW) Plans to show how the rerouted WCP was linking up to the WCP outside the WNDA. The ExA said that Horizon had been requested to add Rights of Way outside the WNDA to their RoW Plans but the document was not accessible during the Hearing.

2.1.3.2 The latest version of the RoW plans [REP5-012] 2.4 Rights of Way Plans – All DCO Sites Rev 3 shows the RoWs adjacent to the North West corner of the WNDA on the Drawing of Existing RoWs (WN0902-HZDCO-ROW-DRG-00002 Rev 1). These include the RoW from Cemlyn Road to the Corn Mill which passes Felin Gafnan Farmhouse (18/001/2), as well as the permissive route across NT land around Trwyn Pencarreg and Cerrig Brith which forms part of the WCP. RoW 38/034/1 which is within the WNDA currently forms a continuation of the RoW 38/034/1 via a NT permissive path across the clapperboard bridge below the Corn Mill.

2.1.3.3 However, these RoW are not all shown on the subsequent drawings. The RoW outside the WNDA is not shown on the Rights of Way during Construction Drwg for this area (WN0902-HZDCO-ROW-DRG-00019 Rev 2) or the Rights of Way during Operation Drwg for this area (WN0902-HZDCO-ROW-DRG-00024 Rev 2 or WN0902-HZDCO-ROW-DRG-00026 Rev 2).

2.1.3.4 WN0902-HZDCO-ROW-DRG-00026 Rev 2 shows the proposed route for the WCP adjacent to this area but it does not show how it connects to the existing WCP. Details regarding how the proposed RoWs will connect to the existing RoW are still missing.

2.1.3.5 The area in which this information is missing is the same area in which the heritage assets are located. The ExA have asked for more details as to how the very sensitive nature of the AONB landscape and the heritage assets will be protected and enhanced. It is anticipated that more detailed proposals in this area will also address connections between the PRow within and outside the WNDA, including proposals for how the end of RoW 18/001/2 will be treated once the current continuation along PRow 38/034/1 is stopped up.

2.1.4 AONB

2.1.4.1 The NT raised concerns that the latest revision to Section 4 of 8.16 Landscape and Habitat Management Strategy, one of only two controlled sections in the LHMS, weakens the protection of the AONB.

2.1.4.2 The original version [APP-424] Section 4 Page 60 Overarching Principles: Landscape Design said:

‘A new landscape setting will be created that reflects the existing open, rolling, drumlin landscape character and sense of place, minimizing harm to the setting of the Anglesey Area of Outstanding Natural Beauty (AONB) and North Anglesey Heritage Coast.’

2.1.4.3 Revision 3 of the LHMS [REP5-036] Section 4 Page 60 Overarching Principles: Landscape Design says:

A new landscape setting will be created that reflects the existing open,

rolling, drumlin landscape character and sense of place typical of the Anglesey Area of Outstanding Natural Beauty (AONB) and its setting and that has regard to the seascape character of the North Anglesey Heritage Coast.

2.1.4.4 It is to be welcomed that the LHMS should make reference to the AONB itself as well as its setting but the proposed change in wording would mean that minimising harm to the AONB and its setting was no longer one of the overarching principles secured by the DCO.

2.1.4.5 In the introduction to Section 4 it explains that the overarching principles ‘underpin the design and apply to both construction and operational phases’ [REP5-036] Section 4 Page 60 Overview Para 4.1.1). The revised wording focuses this overarching principle on the operational phase of the development only, whereas the original wording was equally applicable to the construction and operational phases.

2.1.4.6 The NT recommends that this overarching principle should read: ‘A new landscape setting will be created that reflects the existing open, rolling, drumlin landscape character and sense of place, that minimizes harm to the Anglesey Area of Outstanding Natural Beauty (AONB) and its setting, and that has regard to the seascape character North Anglesey Heritage Coast.’

2.1.5 Mound E

2.1.5.1 The Written Representations Landscape and Visual Issues on behalf of the National Trust Section 3.2 [Rep2-317] set out the adverse landscape and visual implications on the AONB and visitors to Cemlyn Lagoon of reworking Mound E at the end of the construction period. The latest Phasing Strategy [Rep5-040] increases the flexibility sought by HNP with the addition of the qualification that ‘Landscape Mounds will continue to change through construction as material is added and taken away as required’ (Footnote 3 on page 7). The NT opposes this relaxation.

2.1.5.2 The NT welcomes HNP’s suggested change at the ISH on 4/03/19 that as a minimum the northern and western faces of Mound E are not reworked once initially constructed. This approach will have landscape and visual benefits in this very sensitive location as well as ecological connectivity benefits as set out by Dr David Parker for the NT (see below for further details).

2.1.5.3 The NT also welcomes the request by the ExA that HNP prepares a Method Statement for Mound E which would allow at least parts of it to be planted and habitats established prior to the end of the construction phase. We welcome this inclusion, and await sight of this document as part of the Examination.

2.1.5.4 The NT would recommend the addition of a principle to LHMS Section 4 under the Earthworks Section similar to that for Mound B. For example:
The northern and western faces of Mound E will have regard to the landscape and ecological sensitivity of the adjacent AONB. They will be established in their final form early in the construction period and will not be reworked. Early seeding and planting should be delivered with the aim of establishing proposed habitats before the end of the construction period.

2.1.6 Off-site planting

2.1.6.1 The NT supports the inclusion of a mechanism to bring forward off site planting through a Section 106 Agreement. We await further clarification of the detail on how this aspect would be secured, what it seeks to achieve and the engagement of third parties in implementation. It is unfortunate that Horizon have left it until this late stage of consideration to accept the need for off-site mitigation. NT has been advocating the need for a Section 106 agreement to bring forward considerable off site landscaping since pre application, considered up to this point not necessary by Horizon. NT consider the scale of indicative off site mitigation (£100,000) at the ISH as being insufficient given the likely zone of visual influence of construction and operation.

2.1.7 Independent Design Review

2.1.7.1 The NT welcomes the discussion at the ISH in relation to design. We welcome recognition of the current uncertainty of the submission in the issue of design, and how to move from “could” to “will”. The NT has raised design issues from pre application through to Examination, and that a considerably better submission could have been achieved through greater external scrutiny during pre-application. The NT considers it unfortunate that Horizon chose not to continue with engagement of the Design Commission for Wales. We welcome the ExA’s scrutiny in this area in terms of: material choice; sustainability; external independent review. We hope that this external scrutiny can be brought to development within the WNDA, and other unresolved and associated development including the visitor centre building and spent fuel buildings.

2.1.8 Master Planning

2.1.8.1 The NT remains fundamentally concerned about the lack of strategic masterplanning at the site. This is evident in the approach and responses provided by Horizon to issues relating to the siting of the spent fuel buildings. Horizon could not deliver a satisfactory answer to the question of the envisaged landscape of the area post decommissioning. This is a very important residual question to NT. We retain land ownership adjoining this site, and will retain ownership in perpetuity. We have a vested interest to ensure that any structure in this landscape has been adequately considered, justified and the long term siting in the landscape has been designed. The submission and responses at

the ISH demonstrate the lack of masterplanning, the lack of any long term vision and thus fundamental questions remain outstanding in this matter. It is not surprising that this issue has emerged. National Trust has developed a 100 year plus approach to its land management at Cemlyn (the Cemlyn Vision); a copy of this is provided as an Addendum to this submission. A public engagement exercise was undertaken by NT to help formulate The Vision and a series of events held to input to this long term strategy. Horizon chose not to engage or contribute to the Cemlyn Vision. The ExA during the ISH asked Horizon how the spent fuel store buildings will sit in the landscape post decommissioning; a visualization to help demonstrate how masterplanning has brought forward the preferred siting and solution would be a very useful outcome. The NT questions how this can remain as a post Examination issue; it remains fundamental to the principle of achieving an acceptable solution at the site.

2.2 THE HISTORIC ENVIRONMENT

2.2.1 The NT is deeply concerned and surprised about the approach taken by Horizon to the historic environment. We hope for a very early resolution of the matters outlined at the ISH in relation to post excavation funding, storage, management and analysis of archaeological finds. We trust that this will be resolved outside the timelines of the Examination and DCO. We would note that Horizon indicated they would be receiving offers this week, and we would hope that a satisfactory solution will be funded by Horizon. It would be helpful if Horizon could provide an update of this issue to wider Interested Parties as part of the remaining DCO timelines.

2.2.2 The NT waits with interest the summary heritage reports, and trusts these will be available at Deadline 7. We await the consideration of Welsh Government and CADW in relation to the summary reports and note the Welsh Government commentary at the ISH that the assets are not designated but designatable. The NT has a fundamental interest in this issue in relation to its land ownership history and in particular the interrelationship with other notable features in the area such as Cemlyn Fort.

2.2.3 The NT awaits clarification of matters relating to Felin Gafnan. The NT supports the inclusion of listed buildings at the western end of the site within a future Conservation Management Plan (CMP). We await clarification of the Section 106 matters in this context in terms of funding for the preparation and implementation of a CMP. We note the lack of ambition advocated by Horizon in relation to Felin Gafnan, and remain ambivalent about the proposed approach to mitigation. The NT restates that it considers inadequate mitigation has been brought forward for the three listed buildings at Felin Gafnan (NT Horizon Statement of Common Ground).

2.2.4 The NT welcomes the clarification of reinstatement of the Valley Kitchen Garden, but waits how this matter will be secured. We also await clarification of

matters relating to the siting/design/detail of the temporary sewage treatment facility adjoining Cestyll Gardens. We refer to outstanding matters provided above by NT in relation to Felin Gafnan and Rights of Way (paras 2.1.3.2) and residential amenity assessment (para 2.1.2.2). The NT considers these are Examination matters and remain fundamental to understanding residual harm.

2.2.5 The NT remains concerned about the unresolved matters associated with the impact of Mound E drainage water (and other inputs) on the fabric of the water features in the Valley Garden area of Cestyll Garden due to additional flows leading to erosion. This matter may not be accounted for in the additional material on flood risk. We note this issue remains an unclarified residual harm associated with the Registered Park and Garden.

2.3 LHMS AND MOUND E

2.3.1 This issue is a cross-cutting matter and the following discussion should be read in conjunction with section 2.1.5 above, which considers the landscape issues. The NT has a major concern about the reworking of Mound E during construction (year 2-9) and the inability to achieve any permanent habitat creation until year 7 at the earliest. (Phasing Strategy at REP5-039). We now have “Construction Mounds” and “Operational Mounds”. Reworking Mound E has issues concerning slope stability (risk of landslip too) and run-off of sediment threatening Cemlyn Lagoon SAC despite assurances from Horizon and NRW that design and procedures will work.

2.3.2 The NT would wish to re-emphasize that any requirement for pumping water from Mound E to the Afon Cafnan it will be necessary to cross a +6m head which requires a “push” pumping system [REP6-010, Appendix 1-6, section 4]. This will require the silt buster(s) to be located to the west of Mound E, at discharge E1 and it will not be possible to relocate the silt buster to a less visually intrusive position. This remains an unresolved issue for NT, and the prospect of multiple silt buster units and other construction infrastructure remaining on site for lengthy periods at prominent locations within the AONB, and at the key visitor entrance point to Cemlyn Bay.

2.3.3 The NT remains concerned about any reworking from October-March when it will be impossible to establish stabilising vegetation (grasses) even with geotextiles. Can reworking activity be confined to the growing seasons (April-September)?

2.3.4 The NT requests that the western side of Mound E is stabilised and vegetated from the outset, preferably with the final LHMS [REP5-036] habitats and landscape features. Reference is made to 2.1.5.2-4 of this submission in relation to landscape commentary.

2.3.5 The NT remains concerned about phasing and the ability to achieve any

habitat restoration and creation during the construction period extend to the whole site.

2.3.6 The on-site management of soils and their use in site restoration through the creation of habitats remains of concern. There is a section on soil management in the Wylfa Newydd CoCP [APP-414] but no detail on how the soil profiles and correct hydrological conditions will be created in order to achieve the desired habitats as set out in Table 4.1 (page 61 of the LHMS [REP5-036]).

2.3.7 NT welcomes ambitious proposals to create habitats of high biodiversity value and having nature conservation and not agricultural production as the primary focus of site restoration. We welcome further engagement in this matter which has potential benefits in bringing forward synergy with the Cemlyn Vision (para 2.1.8.1 above).

2.3.8 The proposal to create 120ha of “Coarse-sward / species-rich grassland” (57% of the 210ha total habitat creation area) misses the opportunity to create grasslands of likely greater value, such as coastal heath/grassland mosaic (currently 15ha/7%), close sward species-rich grassland (25ha/12%) and marshy grassland (15ha/7%). We propose change to the LHMS to incorporate this matter.

2.3.9 The proposal for 120ha of coarse-sward / species-rich grassland (paragraph 6.5.8, page 110 of the LHMS) is suggesting a sward with primarily National Vegetation Classification) MG5 (lowland meadow grassland) species. The northern coastal environment of Anglesey suggests that an approach which creates a variety of soils and hydrological conditions, together with a range of management approaches (such as hay-meadows, permanent grasslands, etc.), would be a better alternative to one which is attempting to create a particular NVC grassland type. We propose changes to the LHMS to incorporate this matter.

2.3.10 The indicative completed habitat plan (LHMS reference point 5, page 144, which needs to be corrected as an earlier version plan has been inserted at D5 and the key colour coding of habitats is wrong) does not seek to connect the Wnda habitats with those adjoining the site. This misses an opportunity to maximise the value of the new habitats at a landscape scale. We propose change to the LHMS to incorporate this matter.

2.3.11 In the Horizon – NT Statement of Common Ground [REP6-049], at page 20, issue: Integration of the site into the surrounding landscape, the Horizon response on the ecological issue refers to design principles for habitats that require connections and linkages with key adjacent habitats. These are shown in the indicative drawings in LHMS within the Wnda, but not to adjacent habitats and the wider landscape. This is also the case with Trywyn Pencarreg in the next item in the Statement of Common Ground (page 21, REP6-049).

2.3.12 NT requests that the habitat creation proposals are reconsidered, with a principle to prioritise grasslands and habitats of the highest biodiversity value, but also to create habitat mosaics and habitats that are designed to complement and connect with habitats adjoining the WNDA.

2.3.13 NT welcomes future engagement by IACC on matters relating to discharge of LHMS, and welcome pre application discussion on such matters by Horizon, or any future developer. We await details on the governance of engagement post DCO consent which we understand is currently being considered by IACC.

2.3.14 The D5 LHMS (at section 7.2, page 128-129) has improved proposals for monitoring both habitats and species that confirm monitoring will be against objectives in the Management Schemes which will be developed. It is also now confirmed that monitoring and required actions will be undertaken for the lifetime of the Power Station. Flood management will be set out in the Landscape and Habitat Management Schemes.

2.3.15 The suggested revisions to Table 4-1 on page 61 of the LHMS are shown in red below. NT received confirmation by email (5th March 2019 from James Cook stating “I am pleased to be able to confirm that the requested revisions to Table 4.1 will be included in the next revision of the LHMS”. NT await consideration of this document:

Woodland and scrub	25ha (12.5%)	remain at 25ha (12.5%)
Planted hedgerows and cloddiau	10km	remain at 10km
Coarse sward / species-rich grassland	120ha (60%)	decrease to 75ha (37.5%)
Close sward species-rich grassland	25ha (12.5%)	increase to 40ha (20%)
Coastal heath / grassland mosaic	15ha (7.5%)	increase to 30ha (15%)
Marshy grassland	15ha (7.5%)	increase to 30ha (15%)
Ponds (additional to sediment ponds)	9 No.	remain at 9 No.

2.4 CONSTRUCTION TOURISM AND VISITOR MANAGEMENT

2.4.1 In the Horizon – NT Statement of Common Ground [REP6-049], at page 21, issue: Construction Tourism, the Horizon response does not address the NT key issue concerning the impact of construction tourists on the sensitive habitats on NT land at Trwyn Pencarreg Wildlife Site and the shoreline path (Wales Coast Path) to Felin Gafnan.

2.4.2 NT requests that this issue is addressed by Horizon. The new proposal s.106 [REP6-005] Schedule 3 for the Visitor Centre leaves a minimum of a 2 ½ year interim period from start of construction when there will be no additional

provision for managing visitors (construction or otherwise). Also explained in [REP5-053 Appendix 1-4].

2.5 PROTECTION OF THE NATIONAL TRUST SHORELINE BETWEEN FELIN GAFNAN AND TRWYN PENCARREG

2.5.1 The protection of the NT shoreline during construction and operation remains a major outstanding issue between NT and Horizon and this position set out in the D6 Statement of Common Ground [REP6-049]:

2.5.2 The NT position is restated that concerns remain on impacts from the construction and operation of the marine works on the adjoining coastal land owned by the National Trust. The whole of the National Trust shoreline could be affected by the proposed construction and discharge including mobilised sediments from the removal of the temporary causeway. Concerns remain on the landscape and visual impact from land in National Trust ownership, and the lack of detail on the reinstatement of the coastline following the removal of the temporary causeway.

2.5.3 The Horizon position covers issues to do with surface water drainage and controlling the discharges at the mouth of Afon Cafnan (which is not contested), but fails to address the NT's concerns about impacts on the length of its shoreline (not small) resulting from all marine and coastal construction including the removal and restoration of the temporary causeway. These concerns were set out in NT's response to ExA's Q2.14.10 at D5 [REP5-076].

2.5.4 The NT is looking to Horizon to provide a secure legal mechanism to ensure the protection of its shoreline during the construction and operation of the Wylfa Newydd project through measures outline below:

2.5.4.1 The Ecological Clerk of Works being able to work outside the WNDA and set up a monitoring programme along the NT shoreline, concentrating on the section between Felin Gafnan and Trwyn Pencarreg, but extending westwards to Esgair Gemlyn. This can be set out through a revision of the Shoreline Protection and Restoration Method Statement and secured through additions to the Marine Works sub-CoCP [REP5-025];

2.5.4.2 The programme to include physical, chemical and biological monitoring of the NT shoreline in order to detect environmental change caused by, for example, pollution incidents/impacts, sediment deposition and marine litter.

2.5.4.3 The ability of the Ecological Clerk of Works to respond to pollution and littering detected by the monitoring through clean-up and/or adaptive management.

2.5.5 The NT would conclude that the Ecological Clerk of Works has to work

outside the WNDA through implementing the proposals for coastal processes monitoring and mitigation (section 11.5, page 52 of the Marine Works sub-CoCP [REP5-025]). This principle for the Ecological Clerk of Works operating outside the WNDA could be extended to the NT shoreline, the intertidal section of which is also within the boundary of the Harbour Authority. The ability and responsibility for the Ecological Clerk of Works in this regard could be secured through additions to the Marine Works sub-CoCP [REP5-025] at:

-Section 11, 11.1 General, paragraph 11.1.4 (page 43): A suitably qualified and experienced person will be employed during the construction phase to monitor environmental aspects of the Wylfa Newydd DCO Project, as set out in section 11 of the Wylfa Newydd CoCP [REP2-031]. For example, where activities necessitate, an Ecological Clerk of Works will be present to ensure the works proceed in accordance with good practice guidance and adhere to mitigation measures. The Ecological Clerk of Works will operate both within and outside the WNDA in order to deliver this.

-Section 11, 11.2 (page 44) Shoreline protection and restoration. Insert an additional paragraph after 11.2.5: Monitoring of shorelines adjacent to the WNDA will be carried out to include physical, chemical and biological monitoring in order to detect environmental change caused by, for example, pollution incidents/impacts, sediment deposition and marine litter. Clean-up and/or adaptive management will be implemented as required in order to restore the shoreline to normal conditions.

2.5.6 The NT provided Horizon with a proposed modified wording (by email dated 5th March 2019) that might bring forward acceptable change to consider adjoining land. We await any consideration of the above, and acceptability of proposed wording. NT note that following an initial discussion (11th March 2019), Horizon have accepted the need for modification of wording in relation to marine litter (email from Robert Bromley dated 12th March 2019). We welcome the additional wording concerning the scope of the Ecological Clerk of Works and issue of construction litter on the National Trust's shoreline. Whereas we accept that pollution matters will be covered in the development of the Marine Licence, we still have concerns about sediment deposition, both from terrestrial and marine (eg. temporary causeway removal) sources. We believe further change is needed to the submitted documentation to reflect these outstanding concerns. NT may also need to respond to your waste hierarchy proposals after publication at D8.

3. ISSUE SPECIFIC HEARING WEDNESDAY 6TH MARCH

3.1 SECTION 106 AGREEMENT

3.1.1 The NT made detailed comments to IACC in relation to the proposed Deed of Covenant for the Section 106 Agreement (by email dated 21st Feb 2019), and

welcomed sight of a modified draft prior to finalization. No further communication on this has been made.

3.1.2 The NT awaits sight of a final Section 106 Agreement prior to further comment. We note the concluding comments from IACC that there are no substantive disagreements and that there is no prejudice to public interest or the environment in the current wording. NT await the finalized matters in relation to the Conservation Management Plan for Cestyll Garden; AONB off site mitigation; tourism contingency funding; treatment of archaeological interests; Cemlyn lagoon resilience matters. We await consideration of engagement issues for environmental protection and monitoring; and await the publication of the RIES on 27th March 2019. We also await the consideration of the letter from Welsh Government (uploaded on 8th March 2019) in relation to additional time for scrutiny of proposals. Interested Parties may wish to have sufficient time to consider matters further, and associated Governance timelines.

3.1.3 The NT note the late submission by Horizon in relation to Article 83 and 84. NT would note uncertainty in relation to the exclusion of Cestyll Garden from Work Area 12, and await clarification of this matter.

3.1.4 The National Trust have considered Horizon's note *Proposed New Articles and Consequential Amendments Relating to Security* dated 5 March 2019. In respect of sub-paragraph (2)(a) of proposed new article 84, we note that Work No. 12 must not be commenced unless and until "the undertaker has provided a guarantee or an alternative form of security ... in respect of liabilities under the restoration scheme approved under Schedule 3 requirement SPC13" [emphasis added].

3.1.5 It is not clear to us which "liabilities" are being referred to here, not least since requirement SPC13 does not refer to "liabilities". We would therefore request that Horizon clarify the drafting of this provision.

3.1.6 We await consideration of this overarching matter by the ExA.

4.ISSUE SPECIFIC HEARING FRIDAY 8TH MARCH 2019

4.1 HRA

4.1.1 The NT note the degree of concern expressed by NRW at the ISH, the rejection of statutory advice, and the risks brought forward by Horizon in relation to HRA. NT notes the risks that Horizon is taking with the environment of North Anglesey, and to land in National Trust ownership.

4.1.2 The NT remains supportive to the position of NRW, as outlined within the Statement of Common Ground between NT and Horizon. NT awaits the

publication of the REIS on 27th March 2019. The eNGOs have submitted a joint statement on the Anglesey Terns SPA under separate cover.

4.2 THE MARINE ENVIRONMENT

4.2.1 In response to issues raised during the Issue Specific Hearings on 10-11 January 2019, and subsequent discussion with NRW on 4 February 2019, Horizon have provided at Deadline 6 a note entitled 'Coastal processes monitoring an mitigation strategy' (CPMMS). This is stated (e-mail from Daniel Parsons to Teresa Hughes dated 26 February 2019) to represent Horizon's final mitigation offering on coastal processes, and that these measures will be transferred into the Marine Works sub-Code of Practice at Deadline 8. The proposals will therefore be secured with a controlled document.

4.2.2 It is, however, disappointing that, despite requests made at the January ISH, Horizon have chosen not to engage with the National Trust and eNGOs relating to the development of this strategy. Horizon's proposals are set out in Appendix 1-5 to the response to the Response to questions arising at Deadline 5, submitted at Examination Deadline 6.

4.2.3 Horizon has agreed to undertake a monitoring programme of Esgair Gemlyn commencing in year 1 of construction and to adopt an adaptive management approach to mitigation. The key objectives for the monitoring programme as proposed are stated to be (page 2 of Appendix 1-5):

- to generate a suitable baseline (without and with the Wylfa Newydd DCO project);
- to understand the effect of natural variability (e.g. storm events) on Esgair Gemlyn; and
- to generate a baseline data set to determine a set of trigger levels for adaptive management mitigation

4.2.4 These objectives as stated are narrowly focused on the creation of a suitable Baseline, rather than on the outcomes of future monitoring per se, but by inference from statements made elsewhere in the document, Horizon considers that the purpose of the monitoring is essentially to validate the conclusion of no significant impact on integrity on Esgair Gemlyn and related features reached in the Environmental Statement.

4.2.5 The NT wishes to raise the following matters:

4.2.6 Step 1: Coastal processes monitoring

4.2.6.1 Horizon does not proposed to undertake any further work to improve the

Baseline information but instead wishes to rely on existing information, much of it contained in reports prepared on behalf of the National Trust (references RD1 and RD2 at the end of Appendix 1-5). However, none of the recommendations made in these reports about expanding the range of baseline information have been taken up (for example, extending the topographic profiles so far monitored into the subtidal zone, and the undertaking of a nearshore sediment survey). No monitoring of coastal processes is proposed; the focus is entirely on coastal morphological change, and specifically of Esgair Gemlyn.

4.2.6.2 The National Trust welcomes the proposal to continue with annual topographic monitoring along cross-sectional profiles at 13 profiles, shown in Figure 1 of Appendix 5-1. Nine annual surveys are proposed, one prior to construction of the breakwater and eight post-construction. The need for continuance of monitoring beyond year 9 will be reviewed as part of the adaptive management strategy.

4.2.6.3 The National Trust also welcomes the proposal to undertake airborne LiDAR surveys at years 1, 4 and 8 of the construction phase to examine sediment volume, and to review the need for further LIDAR surveys (from year 9) as part of the adaptive management approach.

4.2.6.4 Horizon proposes that the monitoring data will be reported in an annual report, building on successive datasets to examine temporal trends in ridge profile, storm response and broader scale sediment changes/ trends against a set of objectives and principles. The proposals do not indicate which organization would undertake the data assessment and reporting. From a National Trust point of view, it is essential that all monitoring data, in addition to the summary report, are made available for scrutiny by all interested parties.

4.2.6.5 The National Trust and eNGO perspective, governance of the monitoring programme is of key importance. It is recommended that a multi-organization steering committee is established to oversee the planning and reporting of not only coastal morphological change, but all environmental monitoring which has a bearing on interest features of Esgair Gemlyn, Cemlyn Lagoon and Cemlyn Bay. We await consideration of this matter by NRW, IACC and Horizon. NT considers this matter as an Examination issue, and awaits clarification of engagement in environmental monitoring and reporting. Such matters are currently unresolved. The direction proposed by eNGO's can be resolved quickly.

4.2.7 Step 2: Adaptive management mitigation

4.2.7.1 The key objective of adaptive management mitigation is stated to be (page 3 of Appendix 1-5) "to demonstrate commitment to remedial action, in good time, through adaptive management mitigation if trigger levels (i.e. changes outside of natural variation or storm events) are breached".

4.2.7.2 The National Trust would agree with this as a general principle, the key issue lies in the detail of how appropriate trigger levels are defined and acted upon. The inference drawn from paragraphs 1.3.3 and 1.3.4 of Appendix 1-5 is that Horizon is proposing to define the trigger levels and then to agree mitigation with NRW and National Trust. However, the National Trust, as landowner, and the North Wales Wildlife Trust, as tenant, would wish to have wider input into the specification of monitoring data acquisition and trigger level definition, in addition to proposals for remedial action. NT would wish to support greater engagement and collaboration as this aspect of the project moves forward, and welcomes further discussion on what might constitute appropriate input.

4.2.7.3 At paragraph 1.3.8 Horizon proposes to use gravel size material from quarried river gravel sources, 'marine won' sources, or inland quarries to increase the volume of sections of the shingle ridge, should monitoring indicate this to be necessary. The specification of physically and compositionally suitable material, and the location, timing and method of placement, are matters of critical importance on which the National Trust would wish to have direct and meaningful influence.

4.2.7.4 It is a matter of disappointment that no reference is made in Appendix 1-5 to the possibility of using marine washed shingle which could be recovered from locations within the footprint of the MOLF and adjoining areas during construction. The National Trust and eNGOs have raised the issue of beneficial use of this material on several occasions but the suggestions have not been taken up by Horizon.

4.2.7.5 The Horizon proposals, as currently framed, so not contain any guarantee of a financial contribution to the costs of remedial measures which might be considered necessary following major breach of the ridge, or other significant event which is not included in the monitoring programme or assessed in the Environmental Statement (e.g. blockage of the Cemlyn Lagoon weir by shingle). The National Trust and North Wales Wildlife Trust would wish to see some form of secured financial contribution to such works.

4.2.7.5 The NT welcome the direction by the ExA of engagement by Horizon with the eNGO's in this matter. The NT provided by email (dated 5/3/19 to Robert Bromley) to Horizon suggested amendments to text which would bring forward the required change of approach. We hope progress can be made and from our perspective will be open for further discussion and resolution. At the current time, Deadline 7, the matters remain unresolved.

4.3 CLIMATE CHANGE

4.3.1 National Trust note with concern the response provided by Horizon at the ISH in relation to climate change and the nature of future proofing that is brought forward with the submitted scheme. The NT remains concerned about the

implications of UK Climate Projections 2018 (UKCP18) and fast moving science in relation to climate change and how any future project (suspension of the current project will extend timelines for any implementation) will ensure scenarios remain accurate and appropriate, especially to the protection of the Cemlyn Lagoon SAC. The NT is specifically concerned in relation to the implications of climate change for: the site drainage strategy and in particular the construction management and run off from Mound E; siting of the spent fuel stores; MOLF construction and breakwater construction and operation; HRA conclusions and marine modelling.

Thank you for your considerations.

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