



## Wylfa Newydd Project

8.7 Main Power Station Site sub-CoCP  
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## Executive Summary

This document forms the Main Power Station Site sub-Code of Construction Practice (sub-CoCP) for the Wylfa Newydd DCO Project. It covers construction of those parts of the Wylfa Newydd DCO Project within the Wylfa Newydd Development Area (WNDA), including the Site Campus, but excluding the Marine Works, which are is addressed by the Marine Works sub-CoCP.

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# 1 Introduction

## 1.1 General

- 1.1.1 The Wylfa Newydd DCO Project covers a number of discrete locations. As such, the overarching Wylfa Newydd Code of Construction Practice (CoCP) covers project-wide aspects of the Wylfa Newydd DCO Project at all sites located within the Order Limits. Sub-CoCPs are provided for each location and underpin the Wylfa Newydd CoCP. Sub-CoCPs provide only the controls relevant to that particular location.
- 1.1.2 This document forms the Main Power Station Site sub-CoCP within the Wylfa Newydd DCO Project. It covers construction of those parts of the Wylfa Newydd DCO Project within the WNDA including the Site Campus, but excluding construction of the Marine Works which is addressed by the Marine Works sub-CoCP and construction of the Power Station Access Road which is covered by the A5025 Off-Line Highway Improvements sub-CoCP. This sub-CoCP also covers the establishment of the three Sites of Special Scientific Interest (SSSIs) compensation areas (Ecological Compensation Sites), comprising the areas Cae Canol-dydd, Cors Gwawr and Ty du.
- 1.1.3 Figures 1-1 and 1-2 show the areas covered by this sub-CoCP.
- 1.1.4 The delineation between the two areas covered by this sub-CoCP and the Marine Works sub-CoCP has been defined as the mean high water mark (at the time the works are undertaken). Where Marine Works span this line (such as blasting of the rock outcrop that will take place as part of the Marine Works), then the Marine Works sub-CoCP will apply.
- 1.1.5 The Power Station Access Road area is excluded from this sub-CoCP and incorporated under the A5025 Off-Line Highway Improvements sub-CoCP due to the nature of these works (Works No. 1J in the Order).
- 1.1.6 The principal works associated with this sub-CoCP are as follows:
- development of site compounds;
  - construction of perimeter construction fencing and permanent fencing, and diversion of Public Rights of Way (PRoWs);
  - species translocation and site clearance;
  - watercourse realignment;
  - construction of road crossings and haul roads;
  - land remediation and operation of a remediation processing compound;
  - construction and decommissioning of Site Campus and other temporary buildings;
  - installation of plant and equipment to support construction (including cranes and site power);
  - soil stripping, storage and re-use;
  - bulk earthworks;

- deep excavation (of Unit 1 and Unit 2);
  - excavation of other features such as culverts and building foundations;
  - progressive mound creation;
  - construction, commissioning and operation of concrete batching plant;
  - construction of onshore elements of the Cooling Water System;
  - dewatering;
  - drainage works; and
  - construction of the Power Station.
- 1.1.7 This document also covers the construction of the Spent Fuel Storage Facility and Intermediate Level Waste Storage Facility, which are to be built some years after the other construction works within the WNDA have ceased.
- 1.1.8 Site-specific measures to mitigate the effects of the construction works are detailed within this sub-CoCP. Where the requirements of construction practice are covered adequately by the Wylfa Newydd CoCP, those controls are not repeated in this sub-CoCP. Therefore, where no site-specific controls are specified here, reference should be made to the Wylfa Newydd CoCP. If there is a conflict between the requirements of the Wylfa Newydd CoCP and this sub-CoCP, then those detailed in this sub-CoCP will prevail.
- 1.1.9 This sub-CoCP sets out the site-specific controls to be complied with, covering the following aspects of the Wylfa Newydd DCO Project construction:
- communications and community and stakeholder liaison;
  - general site management;
  - traffic and transport;
  - public access management;
  - air quality;
  - noise and vibration;
  - waste and materials management (including soils and land contamination);
  - water management;
  - ecology and landscape management; and
  - cultural heritage.
- 1.1.10 Both this Main Power Station Site sub-CoCP and the Marine Works sub-CoCP should be read together along with the Wylfa Newydd CoCP to understand the full suite of controls for the entirety of the WNDA.
- 1.1.11 For the purposes of this sub-CoCP, the term 'Horizon' refers to Horizon Nuclear Power Wylfa Ltd (or any other undertaker to whom the benefit of the Wylfa Newydd (Nuclear Generating Station) Order (Order) is transferred to under Article 9 of the Order), its appointed representatives and the appointed construction contractors.

1.1.12 Where this sub-~~CoCPs refer~~CoCP refers to Horizon application documents, the Examination Library reference has been provided. External documentation available in the public domain is referenced in ~~Section 13~~section 14 of this sub-CoCP. Those documents that are 'certified documents' pursuant to Article 76 of the Order and listed in Schedule 18 of the Order are not provided a reference for the purposes of this sub-~~CoCPs~~CoCP.

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Figure 1-1 Area covered by the Main Power Station Site sub-CoCP

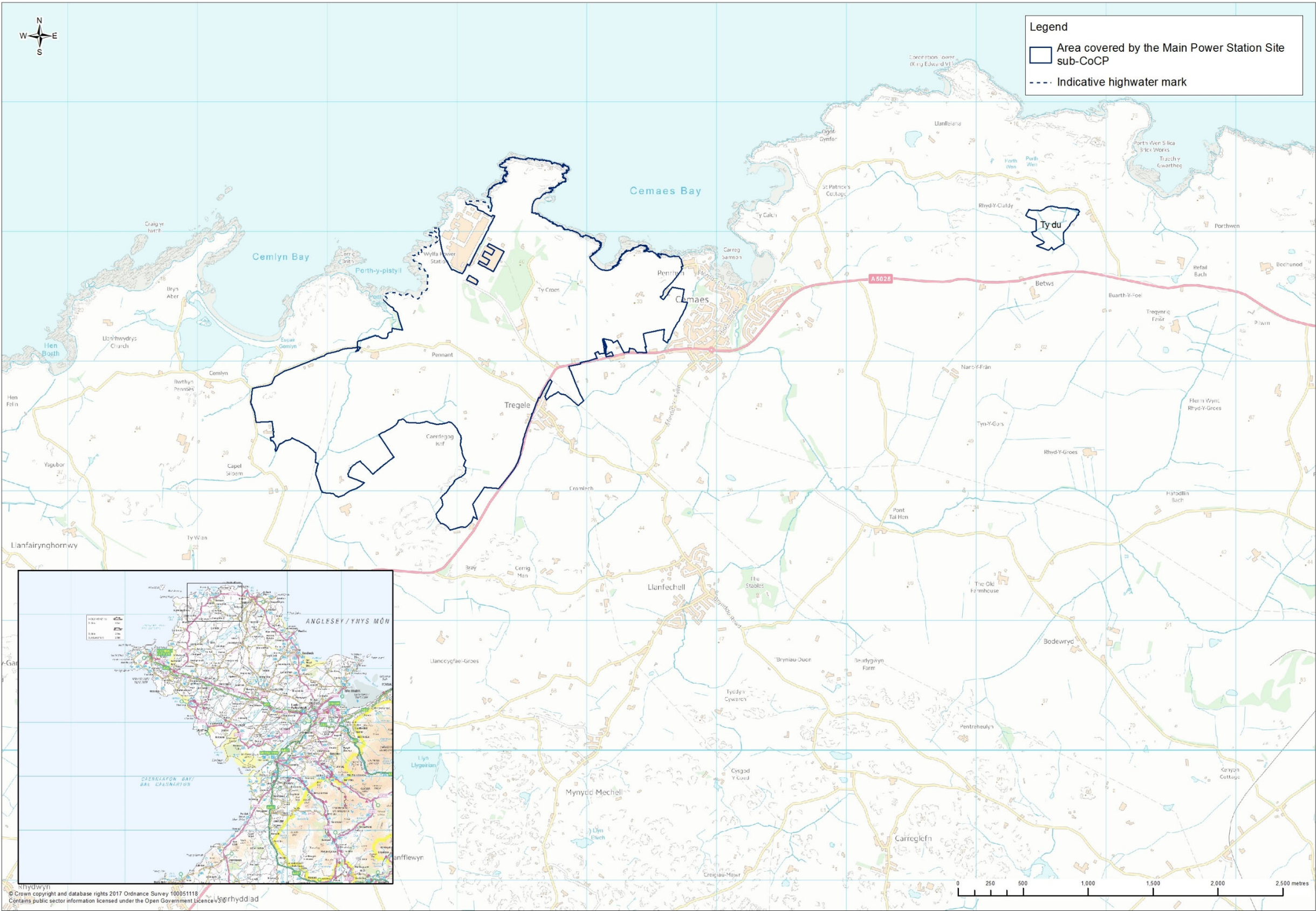
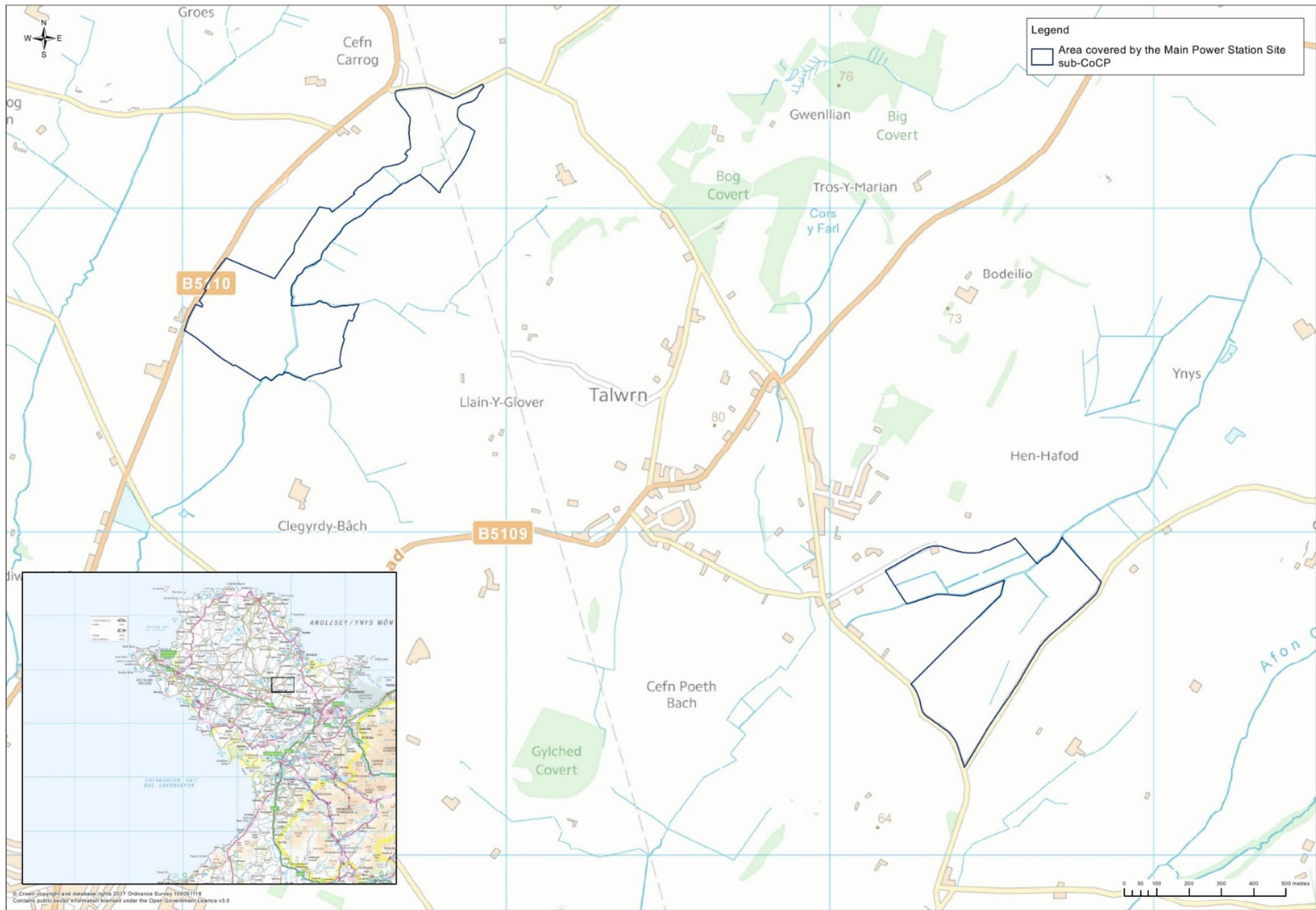




Figure 1-2 Further areas covered by the Main Power Station Site sub-CoCP5



## **2 Approach to environmental management**

### **2.1 General**

- 2.1.1 This section is included here to maintain the structure of this sub-CoCP in accordance with the Wylfa Newydd CoCP, in order to enable easier cross-referencing between the two documents and other sub-CoCPs. Refer to section 2 of the Wylfa Newydd CoCP for full information on Horizon's approach to environmental management which is consistent across the Wylfa Newydd DCO Project.

### **3 Communications and community/stakeholder liaison management strategy**

#### **3.1 General**

- 3.1.1 Horizon's communications and community/stakeholder liaison management strategy is based on the controls set out in the Wylfa Newydd CoCP and any further controls set out in this sub-CoCP.
- 3.1.2 The general mitigation controls to be implemented for communications and community/stakeholder liaison are described in section 3 of the Wylfa Newydd CoCP and DCO s.106 agreement.
- 3.1.3 There are no further site-specific requirements in relation to communications and community/stakeholder liaison for this sub-CoCP.

## **4 General site management strategy**

### **4.1 General**

- 4.1.1 Horizon's general site management strategy is based on the controls set out in the Wylfa Newydd CoCP and any further controls set out in this sub-CoCP.
- 4.1.2 The general mitigation controls to be implemented for site management are described in section 4 of the Wylfa Newydd CoCP.
- 4.1.3 In addition, the measures below outline specific requirements to be implemented during the Main Construction works. For the purposes of this sub-CoCP, Main Construction works is referring to those construction activities within the Wylfa Newydd Development Area that would result in the completion of the Power Station foundations, civil construction activities, commissioning of both Units and site finishing.

### **4.2 Site-specific requirements**

- 4.2.1 Horizon will operate two on-site healthcare facilities:
  - a Construction Site Clinic (a mobile facility within the construction security fence on the Power Station Site); and
  - a Site Campus medical facility (to be provided in accordance with the Phasing Strategy and the DCO s.106 agreement).
- 4.2.2 At the start of the construction period, the Construction Site Clinic will be staffed initially by a nurse, with resources progressively increasing as worker activities increase (e.g. to include paramedics, occupational health nurses, occupational health physicians).
- 4.2.3 The Construction Site Clinic will be operational for the duration of the full construction period of the authorised development. Staffing will scale up and down in proportion to the number of workers on site and demand.

### **4.3 Working hours**

- 4.3.1 For the Main Construction works, multiple shift working will be required, with 24-hour, seven-days-per-week working, in order to deliver a viable construction schedule.
- 4.3.2 Table 4-1 sets out the working hours expected for each of the construction activities during Main Construction within the WNDA. Figure 4-1 shows the construction zones within the WNDA.

**Table 4-1 WNDA construction working hours<sup>1</sup>**

Construction activities	Working hours
Site preparation and clearance (Work No. 12)	Monday to Friday between 07:00 and 19:00 hours Saturday between 08:00 and 13:00 hours
Earthworks (digging, hauling, dumping, back-filling, stockpiling), except in relation to the construction site grading of Mound E and Mound B which shall be as follows.	Between 07:00 and 19:00 hours
Earthworks – site grading in construction zones 6, 7, 8 and 9 and the transportation of resultant material on haul <del>routes</del> <a href="#">HR routes HR-011, HR-B1 and HR-B2</a> for the construction of Mounds E and B.	All plant between 07:00 and 22:00 hours
Temporary and permanent road construction	Between 07:00 and 19:00 hours
Preparation for blasting including rock drilling and packing for blasting Construction operations for deep excavations	24 hours a day, seven days per week,
Blasting (refer to section 8.2 of this sub-CoCP for full detail on blasting controls)	Monday to Friday between 09:00 and 19:00 hours Saturday between 08:00 and 13:00 hours
Marine piling (percussion and sheet) NB. percussion piling will only be in the dry behind the cofferdam	Percussion piling between 07:00 and 19:00 hours Sheet piling 24 hours a day, seven days per week
Drilling and rock anchoring in excavations including application of shotcrete to stabilise open faces	24 hours a day, seven days per week
Moving/repositioning won rock in the excavations both from the marine area (zone 10) and from unit 1 (zone 4) and unit 2 (zone 8). This material will move to areas around the deep	All plant identified in the schedule will operate between 07:00 to 19:00 hours; Half of the plant identified in the schedule will then operate between 19:00 and 07:00 hours.

<sup>1</sup> Unless specified otherwise, construction activities are assumed to be seven days a week.

excavation and for the construction of the Marine Off-Loading Facility.	Note - Material in zone 10 will be placed only as far as the breakwater (24 hours a day)
Tunnelling	24 hours a day, seven days per week
Support operations which covers a range of activities required to support the early works and Main Construction (e.g. equipment/road maintenance, fuelling, dewatering movement of equipment and materials, cleaning)	All plant 24-hour operation
Marine dredging	24 hours a day, seven days a week
Marine Off-Loading Facility construction	All plant, 24 hours a day
Site establishment (facilities/utilities set-up)	Between 07:00 and 19:00 hours
Batch plant set-up	24 hours a day, seven days per week
Miscellaneous construction operations (training, canteens, facilities management, etc.)	24 hours, seven days per week.
Commissioning	24-hour a day, seven days per week

- 4.3.3 Table 4-2 sets out the working hours for all construction activities at the Ecological Compensation Sites.

**Table 4-2 Ecological Compensation Sites working hours**

Days of the week	Working hours
Monday to Friday	Between 07:00 and 19:00 hours
Saturday	Between 08:00 and 13:00 hours
Sunday, Bank Holiday and Public Holiday (which consist of New Year's Day, Good Friday, Easter Monday, Christmas Day and Boxing Day)	No construction work

- 4.3.4 Horizon will seek to minimise overnight working, such as potentially disruptive works, close to the village of Tregele, wherever reasonably practicable.
- 4.3.5 If Horizon identifies that construction works are or are likely to be required outside of the working hours specified in tables 4-1 and 4-2, Horizon will apply to the Isle of Anglesey County Council (IACC) for consent under Section 61 of the Control of Pollution Act 1974 to undertake those construction works. No such construction works may be undertaken prior to Section 61 consent being granted by IACC.



- 4.3.6 During Main Construction, there will be a fortnightly shift pattern – 11 days on, three days off. The three days off would be at the weekend with 50% of workers taking their leave each week.
- 4.3.7 Shift start times are phased in order to reduce traffic numbers. Typical shift times are in table 4-3 below.

**Table 4-3 Primary shift patterns**

Shift	Primary shift start and end times	
	Years 0-2	Years 5 onwards
Day	07:00 – 17:30	07:00 – 17:30
	07:30 – 18:00	07:30 – 18:00
		08:00 – 18:30
Night	19:30 – 06:00	19:30 – 05:00
		20:00 – 06:00

- 4.3.8 The day/night shift pattern during peak construction is likely to be a split of 70% day and 30% night, which would be representative of normal working practice.
- 4.3.9 As operations on site will continue around the primary shift patterns, a minority of staff will not follow the primary shift pattern. Examples include catering, security, cleaning and some specialist construction operational staff.

## 4.4 Site lighting

- 4.4.1 Construction lighting will be designed to reduce sky glow, glare and light spill onto sensitive receptors (for example, bats, breeding and wintering birds, otter, water vole, notable mammals, red squirrel and chough), as well as night-time human viewers, for example, local communities or those enjoying views of dark skies, to below thresholds where significant effects are predicted, where practicable. Measures could include directional lighting.
- 4.4.2 Construction lighting at Mound E will be designed to achieve a light level of no more than 0.1 lux at Cemlyn Bay lagoon.
- 4.4.3 Lighting along the haul road crossing the Afon Cafnan, from columns within 40m either side of the watercourse, will be dimmed 50% outside of construction earthworks working hours to reduce light trespass around the Afon Cafnan. In the event of a security alert or for safety considerations, this lighting will be reset to 100% for the duration of the alert but will resume its regular dimming profile once the security or safety incident has been resolved.
- 4.4.4 The laydown area, behind Mound B, will allow for remote switching of zones within the laydown area when access is required to a specific zone during darkness (excluding security lighting).

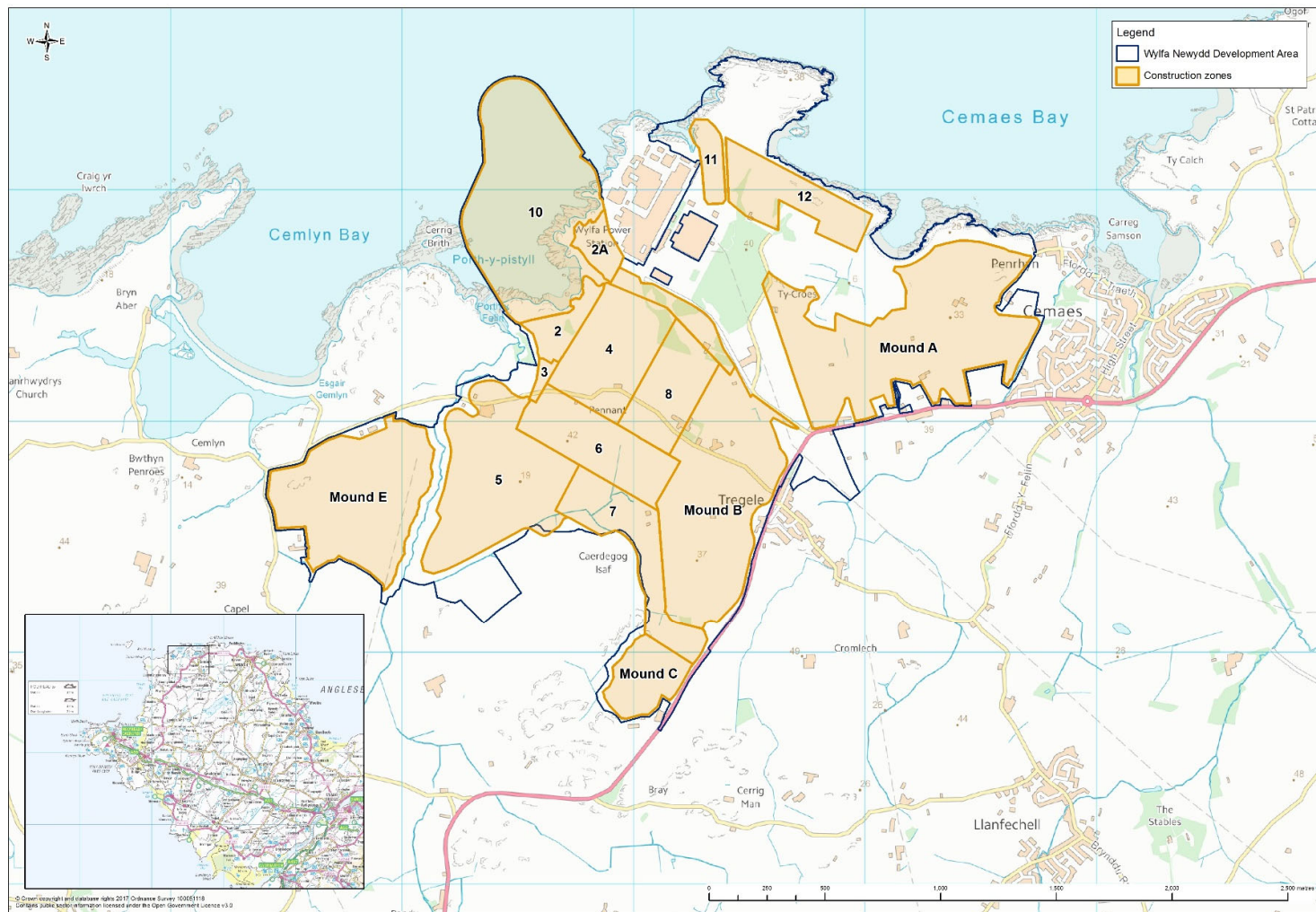


- 4.4.5 Variable lighting levels for the WNDA car park (during construction) will be applied. Variable lighting levels will be based on predicted staff movements and risk assessment.

### ***Overarching Construction Lighting Scheme***

- 4.4.6 Prior to commencement of the authorised development, except for Work No. 12, Horizon will prepare and submit for approval an Overarching Construction Lighting Scheme for the WNDA in accordance with the Requirements in Schedule 3 and Schedule ~~{24}~~<sup>14</sup> of the Order. The Overarching Construction Lighting Scheme will be prepared in accordance with the principles set out in section 4.4 of the Wylfa Newydd CoCP, section 4.4 of this Main Power Station Site sub-CoCP, section 4.3 of the Marine Works sub-CoCP, design principles for the Site Campus in volume 3 of the Design and Access Statement, and the lighting parameters set out in Appendix D10-10 of the Environmental Statement. The approved Overarching Construction Lighting Scheme (or any approved variations) will be implemented for the duration of the construction period.
- 4.4.7 Prior to the commencement of each phase of construction on the WNDA, Horizon will prepare a separate Construction Lighting Plan for that phase in accordance with the approved Overarching Construction Lighting Scheme. These phased plans will be implemented for the duration of the construction of that specific phase.

**Figure 4-1 Construction zones within the WNDA**



## **5 Traffic and transport management strategy**

### **5.1 General**

- 5.1.1 Horizon's traffic and transport management strategy is based on the controls set out in the Wylfa Newydd CoCP and any further controls set out in this sub-CoCP.
- 5.1.2 The general mitigation controls to be implemented for traffic and transport are described in section 5 of the Wylfa Newydd CoCP.
- 5.1.3 In addition, the measures below outline specific controls to be implemented during the Main Construction works.

### **5.2 Site-specific requirements**

- 5.2.1 Electric vehicle charging points will be provided in the main staff car park to incentivise the use of sustainable transport, compatible with others across Anglesey and north Wales.
- 5.2.2 Where possible, use of the vehicle crossing points on the Existing Power Station access road will avoid 07:30 to 08:00 hours and 16:30 to 17:00 hours to limit the potential for effects on those working at the Existing Power Station facility.
- 5.2.3 Staggered shift times (see section 4.3) will be implemented to reduce peak hourly flows associated with private vehicle and bus movements.
- 5.2.4 Construction vehicles will be controlled when departing the WNDA site so that no more than one heavy goods vehicle is released every 90 seconds to avoid convoys on the A5025.
- 5.2.5 Horizon will ensure that heavy goods vehicles do not queue back onto the public highway.
- 5.2.6 There are no further site-specific mitigation measures relating to traffic and transportation, other than those contained in other sections of this document relating to specific aspects of traffic and transportation (such as air quality).

## **6 Public access management strategy**

### **6.1 General**

- 6.1.1 Horizon's public access management strategy is based on the controls set out in the Wylfa Newydd CoCP and any further controls set out in this sub-CoCP.
- 6.1.2 The general mitigation controls to be implemented for public access are described in section 6 of the Wylfa Newydd CoCP.
- 6.1.3 In addition, the measures below outline specific requirements to be implemented during the Main Construction works.

### **6.2 Site-specific requirements**

- 6.2.1 Access to Wylfa Head will be retained throughout construction by retaining PRowS 20/056/1, 20/056/2, 20/002/2, 20/002/5, 20/002/3 and 20/002/4 along the north coast between Cemaes and Wylfa Head as a linear route, though a localised diversion of PRow 20/056/1 may be required.
- 6.2.2 The footpath (20/004/2) from Cemaes to Tre'r Gof will be stopped up during construction with a temporary diversion implemented around the perimeter of the work site as soon as practicable. The temporary diversion will be removed on completion of the new final footpath, which will be implemented with the final landscape scheme on an alignment similar to the existing route.
- 6.2.3 Access to Porth Wylfa and Porth yr Ogof from the Wales Coast Path (WCP) will be retained throughout construction.
- 6.2.4 A diversion of the WCP will be provided as a continuous route throughout construction, around the construction fence between Cemlyn Bay and Cemaes. This route will be unsurfaced. Suitable structures across watercourses will be provided – these could take the form of a simple wooden bridge (they are only for walkers). Footpaths already cross these watercourses, and Horizon will be looking at structures of a similar scale.
- 6.2.5 The existing permissive path at Wylfa Head will be maintained throughout construction outside of the security fencing and will involve the creation of a permissive path route to provide a circular route around Wylfa Head.
- 6.2.6 Signage informing users of the diverted route of the Copper Trail will be in place prior to the diversion of the Copper Trail.
- 6.2.7 To mitigate the effects of the diversion of the WCP during construction, information boards and interpretation boards will be erected at intervals along the route explaining what is happening, as part of a wider trail to encourage continued use of the WCP. The information boards will comprise a map and short interpretation about what is happening and what people can see from the board. The information on the boards will be updated three times during the construction programme as key phases are completed.

- 6.2.8 These information boards will be erected at three locations:
- i. as the WCP leaves Porth y Felin;
  - ii. as the WCP leaves the site of the proposed Visitor Centre, once constructed; and
  - iii. at the link of the diverted WCP as it links to Penrhyn/remaining existing alignment along to Wylfa Head.

## 7 Air quality management strategy

### 7.1 General

- 7.1.1 Horizon's air quality management strategy is based on the controls set out in the Wylfa Newydd CoCP and any further controls set out in this sub-CoCP.
- 7.1.2 The general mitigation controls to be implemented for air quality are described in section 7 of the Wylfa Newydd CoCP.
- 7.1.3 In addition, the measures below outline specific requirements to be implemented during the Main Construction works.

### 7.2 Dust emissions

- 7.2.1 In addition to the measures set out in section 7.3 of the Wylfa Newydd CoCP, the following site-specific measures will also be implemented.
  - On-site haul routes will be inspected for integrity, and any necessary repairs to the surface will be instigated as soon as reasonably practicable.
  - Hard surfaced haul routes will be installed, where practicable.
  - Hard surfaced haul routes will be damped down with fixed or mobile sprinkler systems, or mobile water bowsers, and cleaned regularly.
  - A maximum speed limit will be set for vehicles on surfaced and unsurfaced roads to ensure the health and safety of workers and keep airborne dusts within acceptable limits for sensitive receptors.
  - Haul roads will be capped with suitable materials and techniques, which will have a lower potential for emitting dust than unsurfaced haul roads.
  - Buildings will be soft stripped before demolition, retaining walls and windows in the rest of the building where possible, to provide a screen against dust.
  - On-site crushing equipment required during demolition activities will be designed and operated in accordance with the most recent version of the Process Guidance Note 3/16 for mobile crushing and screening [RD1], where relevant.
  - Earthworks and exposed areas/soil stockpiles will be re-vegetated to stabilise surfaces as soon as practicable.
  - Where soils will be stored for longer than 60 days, stockpiles and temporary landscape mounding will be seeded with an appropriate low-maintenance seed mix.
  - Where it is not possible to re-vegetate or cover with topsoil, as soon as practicable, alternative methods of dust suppression will be used.
  - Where practicable, the vegetation, topsoil or alternative covers will only be removed in small areas during work on exposed areas/stockpiles, and not all at once.

- Bulk cement and other fine powder materials will be delivered in enclosed tankers and stored in silos with suitable emission control systems to prevent escape of material and overfilling during delivery.
- For smaller supplies of fine powder materials, containers will be sealed after use and stored to prevent dust generation.
- An adequate area of hard surfaced road will be constructed between the wheel wash facility and the site exit, wherever site size and layout permits, acting as a final opportunity to remove remaining dirt and water from the vehicle wheels.
- Dust deposition on the Site Campus will be controlled by appropriate cleaning and maintenance, as required.

## **7.3 Design and operation of concrete batching plant**

7.3.1 The design of the concrete batching plant will include embedded mitigation measures to prevent or reduce emissions of dust as part of the design. These will include enclosing the various parts of the plant, silos and cement powder delivery systems and fitting them with suitable dust mitigation systems, where necessary depending on plant type/design. The bays where aggregates will be stored will be enclosed and covered to prevent dust emissions during storage and loading/unloading from the bays.

7.3.2 The following good practice mitigation will be implemented during the operation of the concrete batching plant to prevent or reduce emissions of dust:

- preventing spillages and cleaning any spillages as soon as reasonably practicable;
- carrying out visual inspections to identify any issues which are causing dust emissions;
- cleaning of surfaces to prevent dust being blown out of the batching plant area, especially when it is windy;
- locating stockpiles or dusty activities as far as practicable from nearby sensitive receptors;
- use of water suppression during the loading and unloading of dry material and aggregates (where this would not affect concrete quality and the loading activities are not in fully enclosed bays or controlled by other dust mitigation measures);
- use of water suppression to dampen stockpiles of aggregate (where this would not affect concrete quality and the stockpiles are not located in fully enclosed bays);
- use of wheel wash facilities, if applicable, at the entrance/exit to the concrete batching plant working area;
- aggregate bays stocked to suitable heights beneath the bay wall tops to shield stockpiles from wind;

- bulk storage tanks and silos containing dry materials will be equipped with audible and/or visual high level alarms to warn of overfilling;
- displaced air from silos will be vented to a suitable designed dust arrestment plant; and
- reducing drop heights by using variable height covered conveyors and enclosed chutes as part of the loading and unloading processes.

7.3.3 For use of the concrete batching plant during construction activities, all concrete batching equipment will be designed and operated in accordance with the most recent version of the Process Guidance Note 3/01 [RD2], where relevant.

## 7.4 Odour emissions

7.4.1 The removal of the contents of the trichloroethane sump will be pumped straight into a tanker, as far as practicable. All materials will be removed off-site and sent to an appropriate disposal facility, or treated in a treatment system on-site to reduce the risk of exposure to the atmosphere and potential release of odour. Material visually/olfactorily impacted by hydrocarbons will also be removed from site following excavation, reducing the likelihood of odours from this source.

7.4.2 The package sewage treatment plant for Main Construction will be a modularised system that will be a predominately enclosed. The processes with the highest potential to emit odours, such as the preliminary treatment (screens), balance tanks, primary treatment, sludge storage and sludge treatment, will be covered with active extraction to maintain a slight negative pressure within the process units. The extracted air will be treated to reduce the odour concentrations in line with standard performance levels for odour control units on package sewage treatment plants. Horizon will carry out routine odour walkover surveys, along with other good practice measures, to assess the effectiveness of the odour control system.

7.4.3 The maintenance of package sewage plant will be carried out in line with the manufacturers' specifications and standard good practice measures.

7.4.4 Although the normal operation of package sewage plant is not expected to generate excessive odours, the general mitigation measures to be implemented are:

- regular odour walkovers;
- development of odour complaint response protocols if high levels of odour are detected;
- a suitably qualified and experienced operator to carry out the de-sludging process;
- use of appropriate measures such as a fine spray of clean water or an odour-neutralising agent if odours are generated;
- use of spill kits to manage minor spillages or leaks of effluent;



- development of appropriate procedures to rapidly deal with process upsets, equipment malfunction and breakdown to reduce the risk of generating excessive odours. Alarms are built into plant control systems that will alert operators to malfunctions; and
- appropriate replacement of the skip at the inlet to reduce the accumulation of material and reduce the risk of emissions.

## **7.5 Emissions from plant and machinery**

7.5.1 Site power to support construction is scheduled to be available nine months after commencement of construction works authorised by the [DCO Order](#). The installation of the site power will reduce the need to use diesel generators to power the site compounds, Site Campus and the main concrete batching plant.

7.5.2 Oxides of nitrogen/nitrogen dioxide (NO<sub>x</sub>/NO<sub>2</sub>) emissions management, monitoring and reporting will be implemented during construction. This includes a number of measures (in addition to those set out in the Wylfa Newydd CoCP) to achieve compliance with the appropriate environmental standards set out in table 7-4. The measures are as follows.

- A Non-Road Mobile Machinery (NRMM) fleet mix that will include newer plant complying with the EU Stage IV emissions standards for NRMM (EC Directive 97/68/EC) (i.e. plant generally manufactured after 2014), which emit 80% less NO<sub>x</sub> than Stage IIIB plant. Horizon will implement a minimum of 90% of NRMM to meet the EU Stage IV emission standards.
- Relevant marine vessels undertaking the Marine Works will comply with the International Maritime Organisation MARPOL Annex VI Tier III NO<sub>x</sub> emission limits.
- The use of continuous NO<sub>x</sub> and NO<sub>2</sub> monitoring to track compliance against the Air Quality Objectives (AQOs) and critical levels. Monitoring will include appropriate feedback mechanisms (i.e. monitoring thresholds to act as trigger levels and subsequent responses to trigger exceedances) to ensure the construction activities and site operations can be adapted to respond to measured exceedances or elevated concentrations. The continuous NO<sub>x</sub> and NO<sub>2</sub> monitoring, access to monitoring data, monitoring thresholds and responses to trigger exceedances are described in detail in section 7.6 of this sub-CoCP.
- The continuous monitoring will be supplemented with passive NO<sub>2</sub> diffusion tube monitoring at a number of locations to track the changes in annual mean NO<sub>2</sub> concentrations – the locations of which are to be agreed with the IACC.

7.5.3 With regard to ecological receptors, the aim of the NO<sub>x</sub>/NO<sub>2</sub> emissions management, monitoring and reporting is to reduce the potential for NO<sub>x</sub> emissions (and associated deposition of nitrogen and acid) to cause adverse effects at Tre'r Gof SSSI and Cae Gwyn SSSI (and other relevant ecological receptors). This is primarily driven by the reduction of NO<sub>x</sub>

emissions at source as described in paragraph 7.5.2. For Tre'r Gof SSSI and Cae Gwyn SSSI, potential adverse effects will be managed through the proposed air quality monitoring, combined with habitat management/botanical monitoring and direct mitigation measures set out in this sub-CoCP.

- 7.5.4 With regard to human receptors, the main achievement criteria for the NO<sub>x</sub>/NO<sub>2</sub> emissions management, monitoring and reporting will be to prevent an exceedance of the NO<sub>2</sub> AQOs (further details of the compliance targets and reporting is provided in section 7.6 of this document).
- 7.5.5 The NO<sub>x</sub>/NO<sub>2</sub> emissions management, monitoring and reporting set out here is the same as that described in the Marine Works sub-CoCP.

## **7.6 Dust and air quality monitoring**

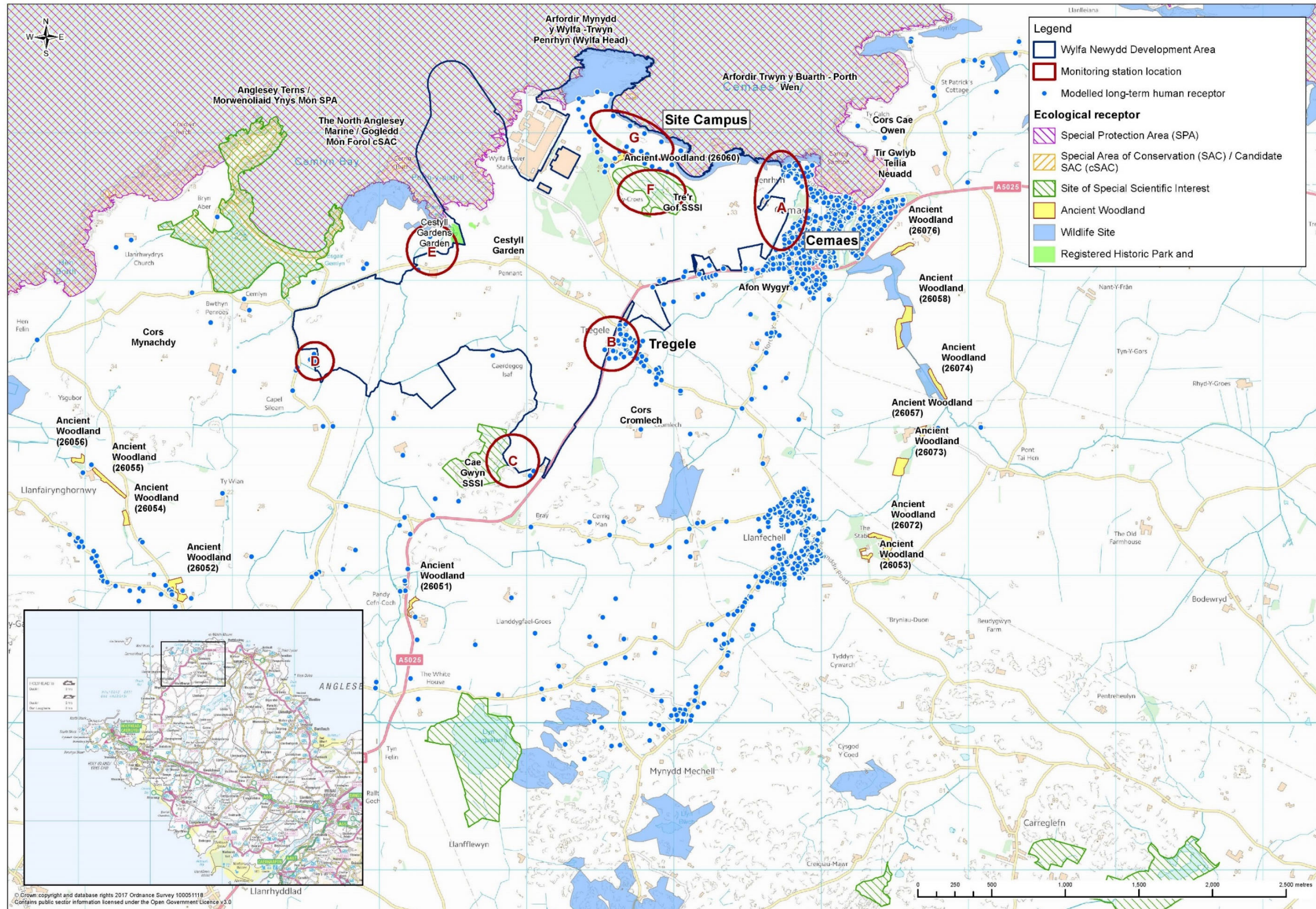
- 7.6.1 The dust and air quality monitoring set out here is the same as that described in the Marine Works sub-CoCP.

### ***Number, location and type of monitoring stations***

- 7.6.2 Horizon will undertake monitoring at seven locations on or close to the boundary of the WNDAs. These are shown on figure 7-1 and are located at:
- Cemaes (A);
  - Tregele (B);
  - adjacent to Cae Gwyn SSSI (C);
  - western boundary (south of Cemlyn Bay) (D);
  - near or at Felin Cafnan (E);
  - Tre'r Gof SSSI (F); and
  - Site Campus (G).
- 7.6.3 The monitoring is proposed to be at locations close to the site boundary that are close to key human or ecological receptor locations. Off-site locations (e.g. locating a monitoring station within the garden of a residential property or on a public footpath) are not considered to be required as the boundary locations are close to the nearest human or ecological receptors and are considered representative of relevant exposure locations. This also avoids or reduces issues with security, access, risk of tampering or damage and other localised sources affecting the monitoring should it be located in the middle of a residential area (e.g. emissions from barbecues or bonfires). Some exceptions may be possible, such as the Felin Cafnan location, where there is a lower risk of the above issues and where monitoring has been undertaken previously by the IACC.



### Figure 7-1 Dust and air quality monitoring locations





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- 7.6.4 As Horizon will use seven locations distributed around the site boundary (see figure 7-1), an off-site control location is not considered to be necessary as there would always be monitoring locations upwind of the WNDA during any one hour (i.e. to assist with the interpretation of data and identification of site sources should a trigger threshold be exceeded).
- 7.6.5 To reduce the risk of inconsistencies in the monitoring data between the monitoring locations, it is proposed to install identical monitoring stations at each of the seven locations. These would contain monitoring equipment to record the following:
- total particulates, PM<sub>10</sub> and PM<sub>2.5</sub> – continuous analyser (Osiris) recording concentrations continuously;
  - dust deposition – dust deposition gauge (Frisbee-type dust deposition gauge, monthly sample); and
  - NOx/NO<sub>2</sub> – continuous analyser (chemiluminescent analyser recording concentrations continuously).

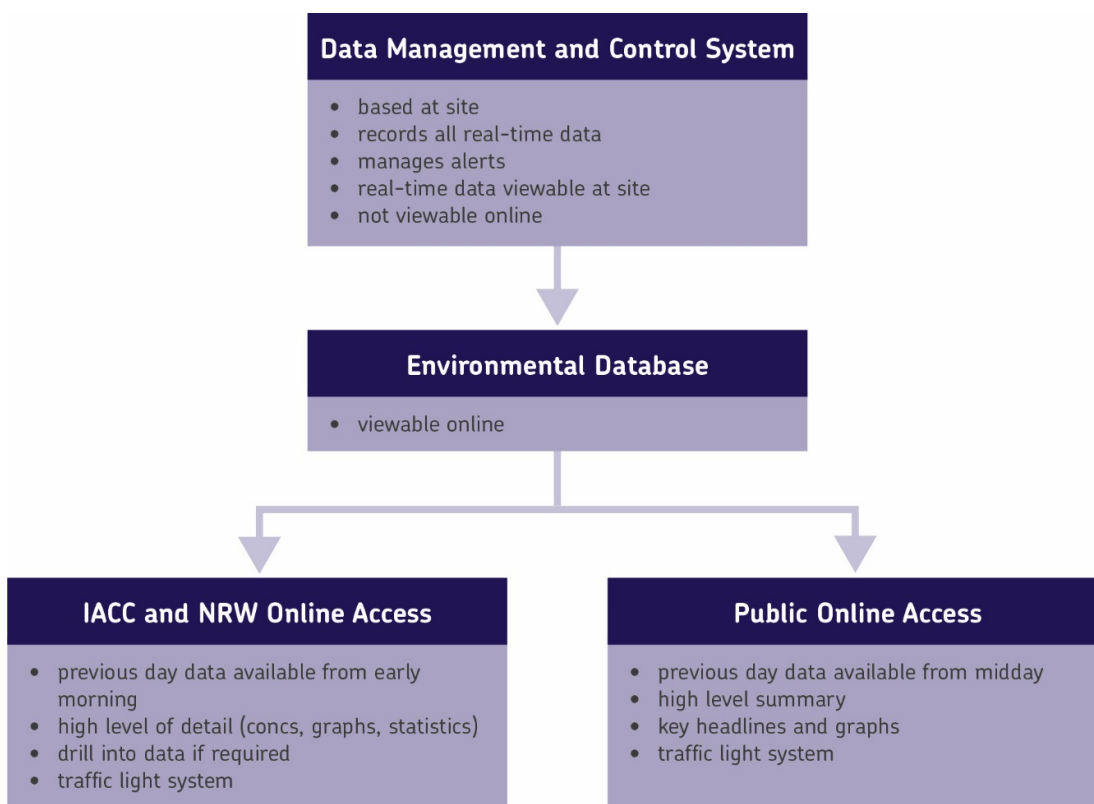
### ***Monitoring data management system and web access to data***

- 7.6.6 Due to the very large scale of the construction site and the number of varied parameters which require to be monitored, recorded and processed, all environmental monitoring data (e.g. air quality, noise, water) will be managed by one central data management and control system.
- 7.6.7 Horizon will obtain the data from the continuous air quality analysers via a site wide data link or data cable around the site boundary. The data will be processed by the central data management and control system and subsequently outputted to a separate environmental database. External parties such as the IACC, Natural Resources Wales (NRW) or members of the public will have online access to the environmental database to view the data.
- 7.6.8 The extent and type of data available to the different external parties will vary depending on the following hierarchy.
- Regulators (IACC and NRW):
    - Previous day data will be accessible the following morning (e.g. from 08:00) showing a relatively high level of detail (e.g. key statistics and graphs of each monitoring station, plus traffic light system of status (i.e. green, amber, red and black – see details below regarding monitoring thresholds to act as trigger levels). Regulators will also have the ability to drill into the detailed data for each monitoring station.
  - Other parties and members of the public:
    - Previous day data will be accessible the following afternoon (e.g. from 12:00) showing a high-level summary (e.g. key headline statistics, key data graphs and traffic light system of status).

7.6.9 Real-time data will be available to be viewed by the IACC and NRW at the WND A on the central data management and control system or could be discussed remotely with Horizon (e.g. via telephone call or webex/video call communication).

7.6.10 A flow chart is provided in figure 7-2 showing the arrangement discussed above.

**Figure 7-2 Flow chart showing management of continuous monitoring data and proposed access arrangements to the online system**



***Monitoring thresholds to act as trigger levels and responses to trigger exceedances***

**Total particulates, PM<sub>10</sub> and PM<sub>2.5</sub> (continuous real-time monitoring)**

***Human receptors***

7.6.11 Table 7-1 sets out the proposed real-time triggers for PM<sub>10</sub> concentrations which will be used by Horizon to undertake redress measures. These will be used to control long-term increases in particulate concentrations as far as reasonably practicable and prevent exceedances of the relevant AQOs.

**Table 7-1 Real time triggers for dust control based on PM<sub>10</sub> concentrations**

Averaging period	Real-time PM <sub>10</sub> trigger concentration (µg/m <sup>3</sup> )			Notes
	Amber	Red	Black	
One-hour average	100	200	N/A	Used to identify large short-term spikes in particulate concentrations from potential dust emission sources or events on site so that these can be controlled as soon as possible.
24-hour average	30	45	50 (AQO)	Used to track and manage compliance with the 24-hour mean AQO and aid in the identification of ongoing but lower level dust emissions not identified using the one-hour average trigger. Based on the calculation of the average concentration commencing at midnight each night and requiring a minimum of six hours (i.e. if the average concentration by 6am or any time after that exceeds 30µg/m <sup>3</sup> then an amber alert would be triggered). The calculation of the average concentration would reset at midnight each night (in accordance with the measurement of 24-hour means for compliance with the AQO). Black is used to identify if there has been a measured exceedance of the AQO (i.e. the average concentration calculated for the full 24-hour period starting and ending at midnight was greater than 50µg/m <sup>3</sup> ).

7.6.12 The system will be set up to issue alerts to key staff members should one of the real-time amber or red trigger concentrations be exceeded. An agreed communication protocol will be setup whereby Horizon contacts the IACC once initial investigations have been undertaken to identify if the trigger was exceeded due to site activities or a wider regional issue or other local source.

7.6.13 Should an amber or red PM<sub>10</sub> real-time trigger level be exceeded, the following initial actions will be implemented by the Site Director following advice of the Environmental Management Team.

- The concentrations from the monitoring station (and other operating parameters) will be initially reviewed to check that the monitoring station was not malfunctioning and the recorded concentration was valid. If valid, the investigation will continue as below.
- The concentrations at the other monitoring stations at the WNDA will be compared to determine if the exceedance was caused by a regional increase in PM<sub>10</sub> concentrations. The data for other monitoring stations on Anglesey and in north Wales would also be reviewed on the Air Quality in Wales website (<https://airquality.gov.wales/>).

- The meteorological conditions for the preceding hours (e.g. wind speed and direction) will be reviewed to determine if the wind direction is blowing from the WNDAs towards the monitoring station or if the wind is blowing from an off-site direction (number of preceding hours reviewed will be dependent on the averaging period of the trigger that has been exceeded).
- Record the outcome of the above reviews and initiate the next steps based on the following outcomes:
  - site activities or sources are the likely cause of the elevated PM<sub>10</sub> concentrations; or
  - it is a wider regional increase in PM<sub>10</sub> concentrations or another localised source causing the trigger exceedance.

7.6.14 If site activities are identified as the cause of the exceedance of the trigger levels, the following actions will be undertaken.

- The IACC will be informed that a trigger has been exceeded due to site activities and investigative works/corrective actions are underway.
- Wind direction will be reviewed in more detail to identify the likely on-site sources or specific work areas.
- The relevant site team(s) working in the likely work area(s) will be informed and a visual inspection of the activities will be carried out to identify or confirm the source(s) of dust emissions.
- The specific site works and current mitigation measures will be reviewed and further action taken. Depending on the source(s), this would involve:
  - applying additional dust suppression, for example, increasing the frequency of water application to the haul roads to damp these down, continuous spraying of water at working areas, aggregate stockpiles or on mounds, using coagulant to bind particles on dirt tracks/roads, setting up additional fixed or mobile water sprays; and
  - altering working methods such as reducing the number of plant or dump trucks working in the area, reducing the speed of vehicles on haul roads or travelling in working areas, temporarily moving working areas to alternative locations, e.g. working on a different face of a landscape mound. Implementing lower speed limits for road traffic and wetting of site access roads would also be undertaken where site access roads are identified sources.
- Visual inspection will be undertaken by the site team(s) and the monitoring data will continue to be reviewed to check the effectiveness of the actions.
- Should the concentrations continue to increase and approach the red trigger, or the red trigger is exceeded, more stringent measures will be considered, including temporary suspension of the specific activity or activities identified as causing the dust emissions.



- The IACC will be kept informed of progress at appropriate intervals as necessary, and dependent on the scale of the trigger exceedance or amber/red status.
- 7.6.15 The measures set out above would continue until the measured one-hour average concentrations drop to below the one-hour average amber trigger level for two consecutive periods, at which point the issue is considered to be resolved. On resolution of the issue, a short update can be provided to the IACC in an agreed format summarising the responses and outcome (e.g. in a short email or text message format). For the 24-hour average trigger, the aim of the measures will be to prevent the average concentration continuing to increase towards the AQO value of  $50\mu\text{g}/\text{m}^3$ . Once a trigger has been exceeded due to site activities and measures have been implemented, the 24-hour average concentrations will be tracked on an hourly basis to determine the effectiveness of the measures.
- 7.6.16 The amber and red trigger levels for  $\text{PM}_{10}$  may be adjusted during the construction works in agreement with the IACC following review of the effectiveness of the thresholds to indicate the potential for adverse effects at off-site locations or if there is a high level of alerts being caused by external sources. The subsequent initial actions, investigative or corrective actions and communication protocols may also be adjusted based on operating experience and effectiveness (in agreement with the IACC).
- 7.6.17 The alert system and subsequent actions will be held to set response times and key performance indicators to enable the efficiency or effectiveness of responses to be monitored or measured. The response times will be dictated by the specific alert and averaging period of the AQO (e.g. a rapid response will be required for a red alert for  $\text{PM}_{10}$  24-hour average concentrations where there are only a few hours of the 24-hour period left). A less rapid response may be required for an amber alert where there is over 12 hours of the 24-hour period left. Performance indicators will be linked to compliance against the relevant air quality standards and other relevant outcomes assessing the effectiveness of the actions.
- 7.6.18 All exceedances of the  $\text{PM}_{10}$  trigger levels, responses and outcomes will be recorded.

### **NO<sub>x</sub> and NO<sub>2</sub> (continuous real-time monitoring)**

#### ***Human receptors***

- 7.6.19 In order to prevent exceedances of the one-hour mean AQO value of  $200\mu\text{g}/\text{m}^3$ , real-time amber and red triggers for  $\text{NO}_2$  concentrations are also proposed as set out in table 7-2.

**Table 7-2 Real time triggers for control of NO<sub>x</sub> emissions based on NO<sub>2</sub> concentrations (human receptors)**

Averaging period	Real-time PM <sub>10</sub> trigger concentration (µg/m <sup>3</sup> )			Notes
	Amber	Red	Black	
One-hour average	100	180	200 (AQO)	Used to identify large short-term spikes in NO <sub>2</sub> concentrations from potential emission sources such as plant and machinery so that these can be controlled as soon as possible. The aim is to prevent exceedance of the one-hour mean AQO which permits 18 exceedances of 200µg/m <sup>3</sup> per calendar year

7.6.20 The system will be set up to issue alerts to key staff members should one of the real-time trigger concentrations be exceeded. An agreed communication protocol will be setup whereby Horizon contacts the IACC once initial investigations have been undertaken to identify if the trigger was exceeded due to site activities or a wider regional issue or other local source.

7.6.21 Should an amber or red NO<sub>2</sub> real-time trigger level be exceeded, the same initial actions for exceeding the PM<sub>10</sub> real-time trigger levels would be implemented by the person or team responsible for the environmental monitoring who receive the alert.

7.6.22 If site activities are identified as the cause of the exceedance of the trigger levels, the following actions will be undertaken.

- The IACC would be informed so that it is aware a trigger has been exceeded and investigative works/corrective actions are underway.
- Wind direction would be reviewed in detail to identify the likely on-site sources or specific work areas.
- The relevant site team(s) working in the likely work area(s) would be informed.
- A visual inspection would be carried out to identify or confirm the likely sources of NO<sub>x</sub> emissions.
- The specific site works and current mitigation measures shall be reviewed and further action taken. Depending on the source(s), this would involve:
  - altering working methods such as reducing the number of plant or dump trucks working in the area(s) likely to be contributing to the elevated concentrations, including shutting down plant, starting with non-critical plant or those with the highest emissions first;
  - reducing the frequency of dump truck or other vehicle trips on the relevant haul roads; and
  - temporarily switching plant to alternative work areas or locations, e.g. working on a different face of a landscape mound.

- The monitoring data would continue to be reviewed to check the effectiveness of the actions.
  - Should the concentrations continue to increase and approach the red trigger, or the red trigger is exceeded, more stringent measures would be implemented (i.e. those measures which could have a significant effect on the programme and costs of the construction of the Power Station), including temporary suspension of works in the area(s) identified as causing the elevated NO<sub>x</sub> emissions. Longer-term solutions would be considered as necessary at a strategic level in consultation with the IACC, including converting plant to be fuelled by liquid petroleum gas (LPG) or converting to electric/battery powered plant.
  - The IACC would be kept informed of progress at appropriate intervals as necessary.
- 7.6.23 The measures set out above would continue until the measured concentrations drop to below the amber trigger level for two consecutive periods, at which point the issue is considered to be resolved. A short update can be provided to the IACC in an agreed format summarising the responses and outcome (e.g. in a short email or text format).
- 7.6.24 The amber and red trigger levels for NO<sub>2</sub> may be adjusted during the construction works in agreement with the IACC following review of the effectiveness of the thresholds to indicate the potential for adverse effects at off-site locations or if there is a high level of alerts being caused by external sources. The subsequent initial actions, investigative or corrective actions and communication protocols may also be adjusted based on operating experience and effectiveness (in agreement with the IACC).
- 7.6.25 The alert system and subsequent actions will be held to set response times and key performance indicators to enable the efficiency or effectiveness of responses to be monitored or measured. The response times will be dictated by the specific alert and averaging period of the AQO. Performance indicators will be linked to compliance against the relevant air quality standards and other relevant outcomes assessing the effectiveness of the actions.
- 7.6.26 All exceedances of the NO<sub>2</sub> triggers levels, responses and outcomes will be recorded.

### ***Ecological receptors***

- 7.6.27 The measurements of NO<sub>x</sub> recorded at Tre'r Gof SSSI will be used to inform management strategies for Tre'r Gof SSSI. The NO<sub>x</sub> monitoring will also be used to determine the potential for adverse effects to occur at Cae Gwyn SSSI and inform the need for further investigation in conjunction with NRW, and subsequent mitigation, if required.
- 7.6.28 Data for the 24-hour mean concentrations of NO<sub>x</sub> at the monitoring locations at or close to Tre'r Gof SSSI and Cae Gwyn SSSI will be provided to the Ecological Clerk of Works (ECoW). This will be used to inform the management of the ecological receptors, including appropriate feedback

from the ECoW to the environmental monitoring and site operations teams where NO<sub>x</sub> has been identified as a potential cause of adverse effects through the botanical monitoring proposed in the Wylfa Newydd CoCP or via surveys undertaken by NRW.

- 7.6.29 The measured average concentration will also be recorded and tracked against the statutory annual mean critical level of 30µg/m<sup>3</sup> as each calendar year progresses. (This will be indicative in the first few months of each calendar year until there is sufficient data to calculate an annual mean equivalent using seasonal adjustment to predict an annual mean.) The ECoW will be kept informed of the measured average/annual mean NO<sub>x</sub> concentrations to inform the need for further investigation.

### **Dust deposition (monthly samples, non-real-time monitoring)**

#### ***Human receptors***

- 7.6.30 Being retrospective, the dust deposition monitoring will form a secondary control mechanism to the primary monitoring control mechanisms (i.e. regular on-site and off-site inspection, continuous real-time monitoring of PM<sub>10</sub> and associated amber and red triggers, recording of dust complaints and the subsequent responses to any issues identified by these processes) and will be used to:
- provide a quantification of the dust deposition to support the primary monitoring controls and good practice dust mitigation and control measures;
  - assist in identifying specific work areas or processes where refinements are required to the working practices and dust controls;
  - corroborate dust complaints which occurred during the sampling period; and
  - understand if there are smaller or more gradual longer-term increases in dust deposition which may lead to loss of amenity and result in complaints.
- 7.6.31 The following checks and reviews will be implemented by the Site Director following advice of the Environmental Management Team once the dust deposition data have been received from the laboratory, collated and an exceedance of the amber or red trigger identified:
- check the observations in the laboratory test report for anything unusual about the sample which indicates it may not be valid;
  - review the on-site and off-site visual inspection records to check if these identified any visible dust emissions from site activities or any noticeable dust deposition at off-site locations, and correlate these to the monitoring location(s) with the dust deposition trigger exceedance(s);
  - review the log to check if there were any PM<sub>10</sub> alerts during the sampling period.

- if there were PM<sub>10</sub> alerts, note at which monitoring stations and if they are the same as the monitoring location(s) with the dust deposition trigger exceedance(s);
- review the complaints log to check if there were complaints of dust during the sampling period and if these are in areas represented by the monitoring location(s) (or downwind of these areas) with the dust deposition trigger exceedance(s);
- review the actions undertaken in response to the visual inspections, PM<sub>10</sub> alerts and dust complaints and the specific outcomes of those actions;
- if needed, review the meteorological conditions for the sampling period (e.g. wind speed and direction, rainfall and general observations) and if there were weather conditions which could potentially increase dust emissions from the site (e.g. very dry conditions with high wind speeds); and
- record the outcome of the above review, for example using the following options (other outcomes are possible):
  - another localised or regional source was the likely cause of the elevated dust deposition measurements – no further action;
  - site activities or sources were the likely cause of the elevated dust deposition measurements;
  - the measured elevated dust deposition rates(s) were likely due to specific site activities or sources which were identified via the primary monitoring control mechanisms (i.e. visual inspections, PM<sub>10</sub> alerts or dust complaints) and was addressed at the time of occurrence;
  - there were no obvious or discernible site activities or sources which were identified via the primary monitoring control mechanisms (i.e. there were no visual inspections, PM<sub>10</sub> alerts or dust complaints which highlighted the potential for elevated dust deposition rates at or close to the monitoring locations which recorded the elevated dust deposition rates).

7.6.32 The IACC will be informed of the outcome of any review undertaken in accordance with paragraph 7.6.31. If required, further discussions would be arranged with the IACC to review existing and future site operations and agree the extent of further review or actions. This would be informed by consideration of key statistics such as the trend in the measured dust deposition rates, the trend or pattern of complaints in relation to site operations (if any) or other related metrics or information which could inform the review process (e.g. the proposed schedule of works and activity levels in the areas closest to the measured elevated dust deposition rates, the trend in long-term particulate concentrations).

### ***Ecological receptors***

7.6.33 Ecological inspections will be undertaken at Tre'r Gof SSSI against which any adverse effects resulting from dust deposition during Main Construction

can be identified. This will be used to identify if further action is required to prevent further dust deposition or damage to the vegetation. This will be achieved via additional mitigation, management or alteration of the dust-causing activities, and through appropriate direct management practices within Tre'r Gof SSSI. These inspections could be extended to the other ecological sites of lower sensitivity as required.

- 7.6.34 The amber and red trigger levels for dust deposition at ecological receptors are set out in table 7-3. The dust deposition data received from the laboratory will be collated and reviewed and the ECoW informed if there are any valid exceedances of the amber or red trigger values at monitoring locations representative of ecological receptors (i.e. the monitoring locations at Tre'r Gof SSSI and close to Cae Gwyn SSSI).
- 7.6.35 The measurements of dust deposition will be used to inform management strategies. The dust deposition data will also be used to determine the potential for adverse effects to occur at Cae Gwyn SSSI and inform the need for further investigation in conjunction with NRW, and subsequent mitigation, if required.
- 7.6.36 The ECoW will provide feedback to the environmental monitoring and site operations teams where dust deposition has been identified as a potential cause of adverse effects through the botanical surveys or related investigations.

**Table 7-3 Non-real-time triggers for dust control based on monthly dust deposition rates (human receptors)**

Averaging period	Dust deposition rate non-real-time trigger (mg/m <sup>2</sup> /day)			Notes
	Amber	Red	Black	
Approximately one month	150	200	N/A	There is no statutory limit for dust deposition at ecological receptors.

### ***Air quality reporting and compliance***

- 7.6.37 Horizon will provide monthly air quality monitoring reports to the IACC and NRW. These reports will contain a summary of the monitoring results and key statistics for the monitoring period, and include a summary of the amber, red or black trigger exceedances during the monitoring period, number and type of complaints received and a summary of actions taken to resolve any issues. The report will also be made available online to be viewed by other parties and members of the public in line with the Wylfa Newydd engagement framework – see the Wylfa Newydd CoCP.
- 7.6.38 The frequency of the reporting required under paragraph 7.6.37 will be kept under review with the IACC and NRW and may reduce in frequency based on the potential for adverse air quality effects at later stages of the construction, or if the monitoring data support this. For example, once the bulk earthworks are complete and First Nuclear Concrete is poured when the potential for adverse air quality effects is reduced.

- 7.6.39 Horizon will adopt the longer-term compliance targets for comparison of the air quality monitoring data. These are separate to the short-term real-time amber and red triggers used to identify site sources, activities or processes and implement further mitigation or measures to reduce emissions. These are based on compliance with the AQOs and are set out in table 7-4.

**Table 7-4 Compliance targets**

Pollutant	Averaging period	Compliance target	Notes
PM <sub>10</sub>	Annual mean	40 (AQO)	
PM <sub>2.5</sub>		25 (AQO)	
NO <sub>2</sub>		40 (AQO)	
NO <sub>x</sub>		30 (AQO)	For the protection of vegetation and ecosystems
PM <sub>10</sub>	24-hour mean	50 (AQO)	The AQO permits 35 exceedances of the 24-hour mean concentration of 50µg/m <sup>3</sup> per calendar year
NO <sub>2</sub>	One-hour mean	200 (AQO)	The AQO permits 18 exceedances of the one-hour mean concentration of 200µg/m <sup>3</sup> per calendar year

- 7.6.40 The measured average concentration will be recorded and tracked against the compliance targets as each calendar year progresses (for the annual mean targets, the calculation of the annual mean would only be valid once sufficient data have been recorded). It is proposed that annualising of the data will be carried out once three months of data have been recorded in each calendar year (i.e. data from 01 January to 31 March) and updated on a monthly basis for the remainder of the year. Annualising of the data to predict the annual mean concentration at each monitoring station will follow the suggested approach set out in relevant guidance [RD3]. Tracking of the annual mean concentrations against the compliance targets will commence from 01 April in each calendar year.
- 7.6.41 The projected or measured annual mean concentrations and number of exceedances of the 24-hour mean and one-hour mean PM<sub>10</sub> and NO<sub>2</sub> AQO values, respectively, will be included in the regular air quality monitoring reports provided to the IACC and NRW in accordance with paragraph 7.6.37.
- 7.6.42 Horizon will use the World Health Organisation annual mean air quality guideline for PM<sub>2.5</sub> of 10µg/m<sup>3</sup> to trigger a joint review with the IACC to determine if Horizon has caused exceedance of the trigger value. This trigger will be based on the measured annual mean concentration at the end of each calendar year (annualised if less than 12 months of data are captured in the first year, although a minimum of six months data would be required).

- 7.6.43 This will include determination of the baseline concentration to understand the potential contribution from site activities. This is a relatively complex issue as it is not possible to record a baseline measurement at the site once construction commences. Therefore, this will rely on measurements undertaken by the IACC prior to construction works commencing, and annualised and scaled to the current year using a comparison of national network monitoring data for rural locations.
- 7.6.44 If the exceedance of the trigger level is clearly attributed to site activities (i.e. the annual mean concentration is 30% or more of the estimated baseline concentration), an action plan will be drawn up to set out reasonable actions that can be implemented by Horizon to reduce PM<sub>2.5</sub> emissions. Reasonable actions would be determined from an initial investigation undertaken in response to the trigger level exceedance, and such an investigation could consider:
- reviewing monitoring data to identify patterns/areas of the site that could be key sources of emissions;
  - reviewing any recurring issues from the real-time PM<sub>10</sub> monitoring, dust deposition monitoring or responses to trigger exceedances and related visual inspections; and
  - seeking input from the Health and Wellbeing Engagement Group where relevant.
- 7.6.45 Drawing on the investigation, as well as operational experience, Horizon would draft up an action plan and implement modifications to site activities or dust control measures as appropriate. For example, these could include:
- increasing dust suppression application to working areas, aggregate stock piles or mounds, including at areas not previously considered to represent significant sources of dust/PM<sub>2.5</sub> emissions; or
  - application of dust suppression during weather conditions not previously considered to lead to dust/PM<sub>2.5</sub> emissions such as lower wind speeds.
- 7.6.46 All actions in the action plan would be those considered to be reasonably practicable and would not include suspension/cessation or reduction of works/activities.
- 7.6.47 Any action plan drawn up in accordance with paragraph 7.6.45 will be reviewed on a once-per-annum basis if PM<sub>2.5</sub> concentrations remain above 10µg/m<sup>3</sup> as a result of a clear increase on baseline concentrations from site activities. All actions in the action plan remain as reasonably practicable unless the measured annual mean concentration approaches the AQO of 25µg/m<sup>3</sup>.



## 8 Noise and vibration management strategy

### 8.1 General

- 8.1.1 Horizon's noise and vibration management strategy is based on the controls set out in the Wylfa Newydd CoCP and any further controls set out in this sub-CoCP.
- 8.1.2 The general mitigation controls to be implemented for noise and vibration are described in section 8 of the Wylfa Newydd CoCP.
- 8.1.3 In addition, the measures below outline specific requirements to be implemented during the Main Construction works.

### 8.2 Blasting mitigation

- 8.2.1 The blasting process would be designed to ensure that relevant vibration thresholds are complied with. The assessment of vibration from blasting is therefore based on compliance with the following guidelines:
  - BS 6472-2 [RD4] set of satisfactory vibration magnitudes for residential receptors, offices and workshops; and
  - BS 5228-2 [RD5] for buildings (including those of historic value that are considered structurally sound).
- 8.2.2 All blasting methods will be designed to comply with the vibration threshold values set out below.
  - 1. To prevent undue disturbance at residential dwellings, education facilities, bat roosts and barn owl roosts, the following vibration levels set out in BS 6472-2 [RD4], as measured outside the building, will apply:
    - i) the vibration level shall not exceed:
      - a. 6mm/s Peak Particle Velocity (PPV) for 95% of blasting events in any six-month period (between 09:00 and 18:00 hours Monday to Friday and between 08:00 and 13:00 hours Saturday);
      - b. 4.5mm/s PPV for 95% of blasting events in any six-month period (between 18:00 and 19:00 hours Monday to Friday); or
      - c. any higher limits agreed with the IACC on a case-by-case basis; and
    - ii) the vibration level from any single event shall not exceed 10mm/s PPV.
  - 2. To prevent undue disturbance at offices and workshops, the following vibration levels set out in BS 6472-2 [RD4], as measured outside the building, will apply:
    - i) the vibration level shall not exceed 14mm/s PPV for 90% of blasting events in any three-month period; and

- ii) the vibration level from any single blasting event shall not exceed 21mm/s PPV.
3. To prevent the onset of minor cosmetic damage to buildings (including those of historic value that are considered structurally sound), the following peak component particle velocities in the frequency range of the predominant pulse and measured on a structural element at the base of the building will apply (source: table B.2 of BS 5228-2 [RD5]):
- i) at residential or light commercial buildings, 15mm/s at a frequency of 4Hz increasing linearly to 50mm/s at a frequency of 40Hz;
  - ii) at industrial and heavy commercial buildings, 50mm/s at frequencies of 4Hz and above; and
  - iii) important buildings which are difficult to repair, or those thought to be structurally unsound, shall require special consideration on a case-by-case basis.
- 8.2.3 The above limits are based on up to three blasting events per day. If it is necessary to conduct more than three blasts per day, then the permitted vibration level of each blast will be reduced in accordance with the formula set out in section 6.2 of BS 6472-2 [RD4]. Blasts for the Main Construction works will be scheduled Monday to Friday between 09:00 and 19:00 hours, and Saturday between 08:00 and 13:00 hours (with no blasting after dusk between March and September). In practice, because of the change in length of day and the change to British Summer Time, dusk falls after 19:00 from April until September. There will be no blasting after 13:00 on Saturdays or at any time ~~on~~ on Sundays, Bank Holidays and Public Holidays (which consist of New Year's Day, Good Friday, Easter Monday, Christmas Day and Boxing Day).
- 8.2.4 Horizon will provide advanced notification to residents of the anticipated times of blasting via the mechanisms set out in section 3.2 of the Wylfa Newydd CoCP. Blasting will be scheduled on the hour (plus or minus 10 minutes). However, if the blasting slot is missed or if unforeseen circumstances arise, the blast will be undertaken at half past the hour precisely, following prior notification to residents by Horizon.
- 8.2.5 Additionally, suitable vibration threshold limits have been derived previously for the above Site Sensitive Receptors as part of conducting vibration trials during on-site rock fracturing activities. The selected thresholds vary from 5mm/s for National Grid installations up to 50mm/s for buried water utility structures.
- 8.2.6 Horizon confirm that mitigation measures will be employed as necessary to ensure that the blasting process complies with the relevant thresholds at 8.2.2.
- 8.2.7 Horizon will employ a specialist blasting contractor with a proven record of blasting work of this scale. Using their experience, they will manage the work safely and control each blast, limiting vibrations, airblast and associated noise. The specialist blasting contractor shall have a registered shotfirer and specialist explosive supervisor to direct these works.

- 8.2.8 Mitigation measures depend on a variety of factors but could typically include:
- face and borehole mapping to establish geological variations;
  - accurate survey of boreholes (Light Detection and Ranging (LiDAR)) and measurements of burden;
  - optimising placement and suitability review of explosive used;
  - effective stemming placement; and
  - suitability review of explosives and frequent reassessment of blast pattern design.
- 8.2.9 The exact mitigation measures to be employed will be determined by the specialist blasting contractor, subject to proximity to sensitive structures, the vibration limits, the size of the bench and charge weight planned and the review of monitoring data from previous blasts.

### **8.3 Noise and vibration control measures**

- 8.3.1 Horizon will undertake a vibration risk assessment as part of the Section 61 application for any construction activity involving vibratory or impact equipment to be used on the Power Station Site. This assessment will establish safe working distances for receptors in relation to construction vibration. This will ensure that any equipment that is identified as having potentially adverse vibration effects can be located sufficiently away from any sensitive receptors, so that any effects on such receptors can be reduced to negligible. Where works are required within the safe working distances, alternative equipment or working methods will be used to reduce vibration levels on sensitive receptors to the greatest extent practicable. Appropriate vibration monitoring will be carried out at the closest receptors to determine the success of these controls.
- 8.3.2 To improve efficiencies, some works will be carried out during the more sensitive evening, night-time and weekend periods. However, key potentially noisy activities will be restricted during these periods. For example, earthworks near receptor locations will not be carried out at night. Blasting events will also not be planned for these more sensitive periods. As part of the Section 61 process, blasting times will be communicated to the local community in advance. See table 4-1 of this sub-CoCP which details the permitted hours for different construction activities within the WNDAs.
- 8.3.3 The following mitigation will also be applied on-site with regards to noise.
- A screening bund along the east boundary of construction Zone 9 (Mound B, adjacent to the A5025) will be delivered in accordance with the Phasing Strategy in such a way that none of the dwellings in Tregele are regularly subject to noise levels (due to construction noise effects from the haul route to Mound C and earthworks in Zone 9) over 62dB L<sub>Aeq, 1-hour</sub> for more than eight weeks. Appropriate and regular noise monitoring

will be carried out at the dwellings closest to the bund, to ensure compliance with this threshold.

- The strategic placement of material when building Mounds A and C will create noise barriers that construction plant will work behind. This will require that the mounds to be built sequentially in layers, with the perimeter of the mounds nearest to properties being built first, which will then provide attenuation whilst the remainder of that layer is completed behind.
- The distance to noise-sensitive receptors (e.g. bat barns, chough nesting sites) will be taken into account in choosing the location of construction compounds, so that standoff distances between noise sources and receptors are increased as far as reasonably practicable.
- Haul roads will be capped with suitable materials and techniques, which will have a lower potential for emitting noise and vibration than unsurfaced haul roads.

## **8.4 Noise and vibration monitoring**

- 8.4.1 Horizon will install continuous noise and vibration monitoring to be deployed throughout the construction works at the WNDA. The IACC will have shared access to the monitoring data, with the opportunity for public access to relevant information, such as average noise levels.

### ***Number, location and type of monitoring stations***

- 8.4.2 Prior to commencement of Main Construction, Horizon will install noise monitoring equipment at seven locations representative of the closest residential receptors to the WNDA. Vibration monitoring will be installed at three locations. A combination of off-site and on-site locations are proposed. In some cases, the locations selected for noise monitoring and for vibration monitoring will coincide. Where on-site locations are proposed, the positions are close to human receptor locations, and measured levels would be very similar to those experienced by the local residential population. Security and access considerations would not significantly constrain the siting of the equipment on-site. Where off-site locations are proposed, the positions will be selected to ensure that the attenuation effects of landscaped mounds are considered, enabling a representative measurement of noise levels affecting local residents in these areas.

- 8.4.3 The general locations are shown in figure 8-1 and are as follows:

- off-site locations at the receptor (noise and vibration monitoring):
  - Cemaes (location 1);
  - Tregele (location 2); and
  - at, or in the vicinity of, Felin Cafnan (location 3);
- off-site locations at the receptor (vibration monitoring only):
  - at the Grade II Listed Corn Mill near Felin Cafnan (location 3);

- on-site locations (noise monitoring only):
  - adjacent to Cae Gwyn SSSI/new site entrance (location 4);
  - the western boundary (south of Cemlyn Bay) (location 5);
  - the site boundary between Tregele and Cemaes (location 6); and
- on-site location (noise and vibration monitoring):
  - in the vicinity of the Site Campus (location 7).

8.4.4 Precise locations will be confirmed by the first Section 61 application, once initial site suitability visits have been undertaken. Provision of the noise and vibration monitoring at the off-site locations identified above is subject to agreeing permission to install and maintain the equipment and suitable access arrangements with land owners/occupiers. If permission or suitable access arrangements cannot be agreed, then alternative monitoring locations shall be proposed to the IACC. If equipment is damaged or tampered with then Horizon reserves the right to remove it and propose and arrange for it to be installed in another location following discussions with the IACC.

8.4.5 These continuous monitoring stations will be maintained for the duration of the Main Construction programme.

8.4.6 The noise monitoring equipment will meet the following requirements:

- Remote (3G mobile network and/or WiFi) control and data transfer capabilities.
- Daily equipment verification (e.g. microphone charge injection calibration/electrical verification of the complete measurement chain).
- Annual calibration at a competent calibration laboratory that can demonstrate that its measurements are traceable to national standards such as BS 7580-1:1997 *Specification for the verification of sound level meters. Comprehensive procedure* [RD6] or BS EN 61672-3:2006 *Electroacoustics. Sound level meters. Periodic tests* [RD7] (or subsequent revisions).
- Sound level meters shall comply with the requirements of:
  - Type 1 of IEC 60804:1985 *Specification for integrating-averaging sound level meters* [RD8] (or subsequent revisions); and
  - Class 1 of IEC 61672-1:2003 *Electroacoustics – Sound level meters – Part 1: Specifications* [RD9] (or subsequent revisions).
- Equipment shall be the integrating-averaging type, capable of the simultaneous measurement and logging of all required measurement parameters. The noise monitoring equipment shall be set to log the following A-weighted broadband statistical noise descriptors at each measurement location:
  - $L_{Aeq, 1-hour}$  (ambient noise level);
  - $L_{A90, 1-hour}$  (background noise level); and

- L<sub>A01, 5-minutes</sub> (commonly used to quantify impulsive noise such as from piling).
- 8.4.7 Horizon will purchase two additional noise monitors which can be put in place while equipment is undergoing calibration or maintenance to provide continuity of measurements.
- 8.4.8 The vibration monitoring equipment will meet the following requirements:
  - remote (3G mobile network and/or WiFi) control and data transfer capabilities;
  - capable of tri-axial measurements;
  - will conform to the requirements of Class 1 accuracy defined in DIN 45669-1 [RD10];
  - PPV range of 1 to 100mm/s; and
  - frequency range of at least 1 to 200Hz.
- 8.4.9 Additional short-term noise or vibration measurements at key locations (ranging from hours to weeks) will be identified in each Section 61 application, as required, and will take into account the characteristics of the works described by the specific Section 61 application.

#### ***Monitoring data management system and web access to data***

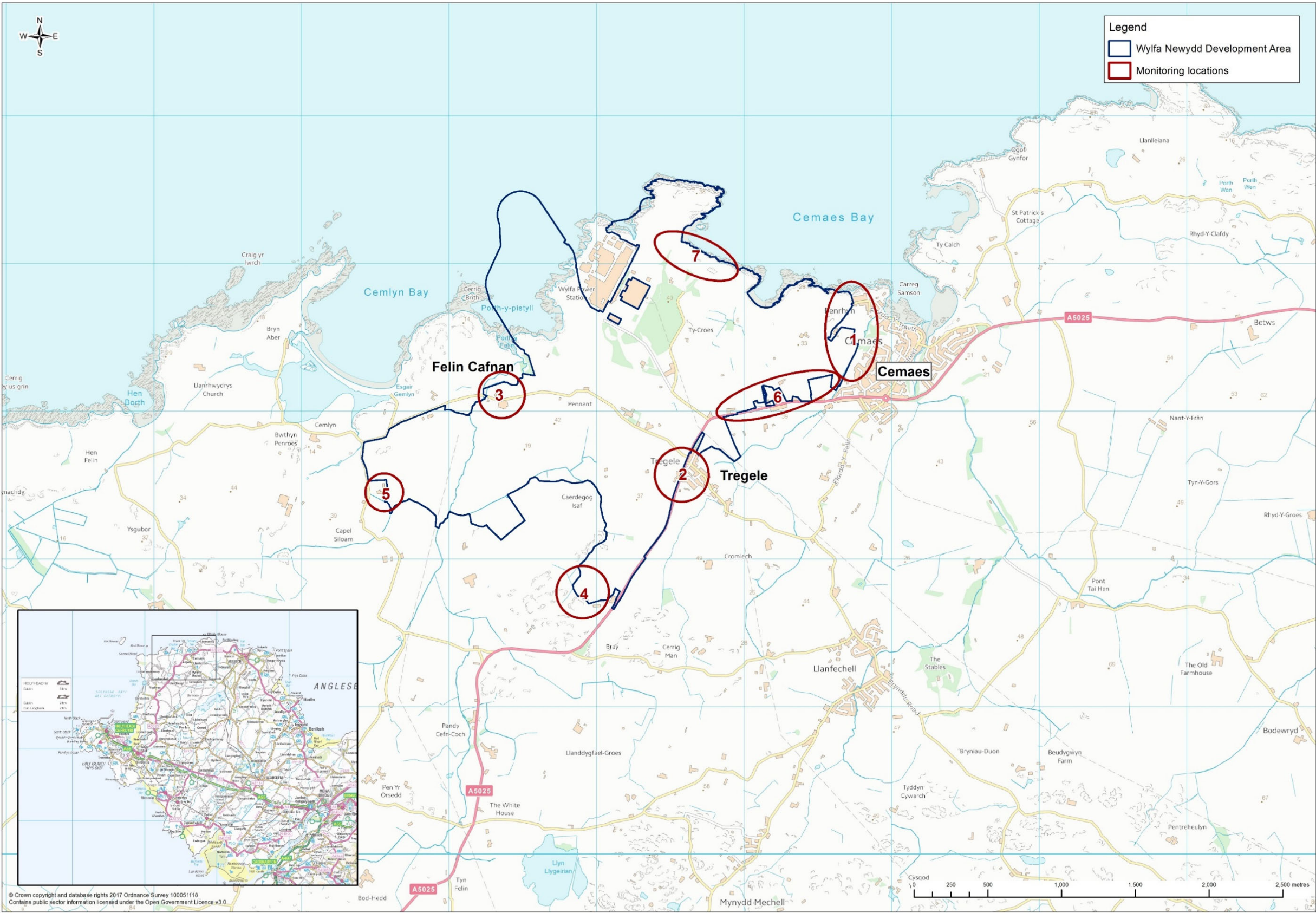
- 8.4.10 Due to the large scale of the construction site and the number of varied parameters which require to be monitored, recorded and processed, all environmental monitoring data (including noise and vibration) will be managed by one central data management and control system.
- 8.4.11 Horizon will obtain the data from the continuous noise and vibration monitoring equipment via a site wide data link, data cable around the site boundary or 3G signal as appropriate. The data will be processed by the central data management and control system and subsequently outputted to a separate environmental database. External parties such as the IACC, NRW and members of the public will have online access to the environmental database to view the data.
- 8.4.12 Real-time data will be available to be viewed by the IACC or NRW at the WNDA on the central data management and control system or could be discussed remotely with Horizon (e.g. via telephone call or WebEx/video call communication).

#### ***Noise and vibration reporting***

- 8.4.13 Summary reports of noise monitoring and vibration monitoring will be submitted to the IACC monthly until First Nuclear Concrete is poured.
- 8.4.14 After First Nuclear Concrete, reports will be submitted every three months (or as otherwise agreed with the IACC).



Figure 8-1 Noise and vibration monitoring locations



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## **9 Waste and materials management strategy, including soils and land contamination**

### **9.1 General**

- 9.1.1 Horizon's waste and materials management strategy is based on the controls set out in the Wylfa Newydd CoCP and any further controls set out in this sub-CoCP.
- 9.1.2 The general mitigation controls to be implemented for waste and materials (including soil management) are described in section 9 of the Wylfa Newydd CoCP.
- 9.1.3 In addition, the measures below outline specific requirements to be implemented during the Main Construction works.

### **9.2 Land contamination**

- 9.2.1 A contamination watching brief will be carried out by suitably qualified and experienced personnel when excavating areas of made ground.
- 9.2.2 Horizon will ensure that, during the remediation works for asbestos-containing materials, continuous air monitoring and testing will be undertaken by a certified P403 (Asbestos Fibre Counting) and P404 (Air Sampling and Clearance Testing for Asbestos) analyst who will be on-site to carry out the fibre monitoring.
- 9.2.3 If asbestos-containing materials are discovered in buildings, further intrusive surveys will be necessary in some buildings when vacated. Horizon will carry out further surveys and arrange for the removal and disposal of asbestos-containing materials as necessary.

### **9.3 Remediation activities**

- 9.3.1 Areas of known land contamination set out within this section 9.3 relates to figure 9-1.
- 9.3.2 Horizon will prepare Land Contamination Remediation Management Plans for these areas of the WNDA in consultation with the IACC, as set out in section 9.4 of the Wylfa Newydd CoCP.
- 9.3.3 Following remediation, Horizon will prepare verification reports in consultation with the IACC, as set out in section 9.4 of the Wylfa Newydd CoCP.

#### ***Soils and groundwater within APC7 – sump/valve chamber area***

- 9.3.4 All sump and valve chamber infrastructure as identified (as 'TCE sump and valve chamber' on figure 9-1) and surrounding soils/made ground/superficial geology identified as being contaminated and within a 5m radius and 1m depth greater than the base of the infrastructure (or to bedrock) will be excavated. Prior to excavation, remnant water/silt within

the sump structure will be pumped out and removed from site for suitable disposal. Any groundwater ingress during the excavation works will be pumped and treated/disposed of off-site as appropriate.

- 9.3.5 Excavated material not removed from site will be appropriately managed between excavation and placement within the landscape mounds. The material will be stored separately from natural soils to reduce the potential for cross-contamination. The sump and valve chamber infrastructure, and any impacted materials surrounding the structure, will be appropriately disposed of off-site. Any adjoining pipework (leading to the Existing Power Station) will be removed within the extents of the WNDA and stopped off as agreed with the operators of the Existing Power Station.
- 9.3.6 Soils, made ground and superficial geology excavated from the area immediately around the sump will be reused within the landscaped mounds, provided it is determined to be 'suitable for use' in accordance with the CL:AIRE Code of Practice [RD11]. However, as a precaution, this material will be placed at a depth greater than 1m below finished ground levels.

### ***Soils and groundwater within APC7 – OT613***

- 9.3.7 Any material visually impacted by hydrocarbons will be segregated and disposed of off-site. According to available laboratory analysis, material excavated from the area that is not visually impacted by hydrocarbons is potentially suitable for reuse within the landscaped mounds.
- 9.3.8 Excavation will be undertaken within a 5m radius around the area where hydrocarbons have been identified (the south-western part of the OT613 trench – refer to figure 9-1) and extended to bedrock, with all overlying made ground/soil/superficial geology removed for either disposal or reuse as appropriate.
- 9.3.9 If visual or olfactory evidence of hydrocarbon contamination is encountered during remediation works, unexpected contamination procedures will be implemented.
- 9.3.10 Appropriate protocols will ensure that the excavated material is appropriately managed between excavation and disposal or placement within the landscape mounds. The material will be stored separately from natural soils to reduce the potential for cross-contamination. If groundwater ingress occurs during the excavation works, the water will be observed for visual and olfactory indicators of contamination. If hydrocarbon contamination is recorded, the groundwater will be pumped and treated to achieve discharge criteria or otherwise disposed of off-site.

### ***Soils and groundwater within APC7 – area of waste material and other areas of identified ACM-contaminated made ground***

- 9.3.11 Known asbestos hotspots that will be subject to construction activities will be excavated under the direct supervision of an Asbestos Specialist. Excavations will continue until all visible asbestos is removed, and appropriate verification testing will be undertaken to confirm remediation

has been successful. The excavated material will be transported to a remediation compound established on-site where the material will be handpicked for visible asbestos fragments. Once processed, the material will be tested to confirm that it is below the 0.1% hazardous waste threshold on a weight for weight (w/w). Once confirmed, the material will be removed to a stockpile (located within the remediation compound) where it will be placed on a geomembrane, capped with a membrane and covered with inert material, where it will be stored prior to reuse within the core of the landscaped mounds.

- 9.3.12 Refer to figure 9-1 for known asbestos hotspots that would be subject to the above remediation.
- 9.3.13 Shallow groundwater is not anticipated within the asbestos remediation areas. However, if groundwater ingress occurs during the excavation works, the water will be observed for visual and olfactory indicators of contamination. If contamination is observed, the groundwater will be pumped and treated to achieve discharge criteria or otherwise disposed of off-site.

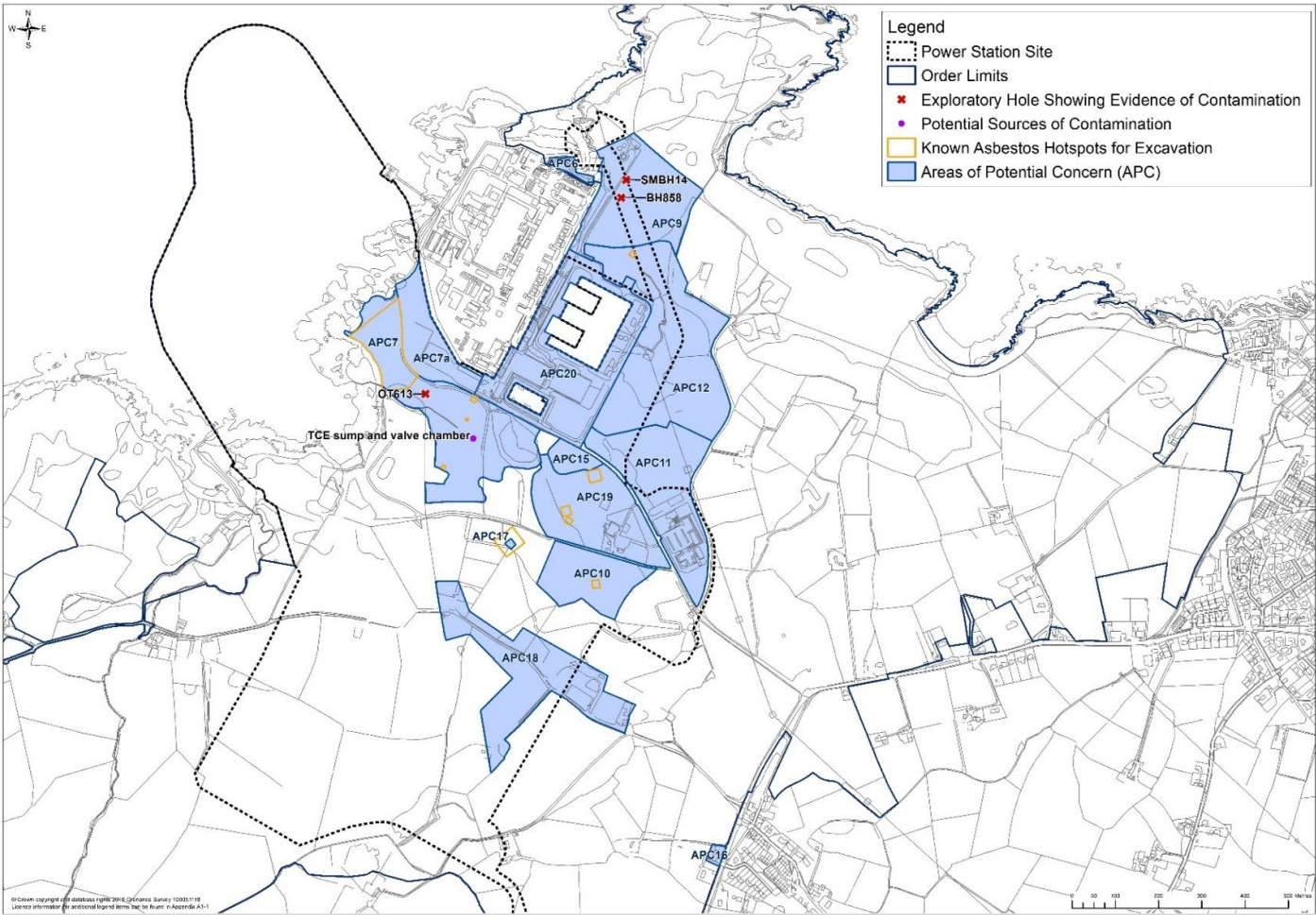
#### ***Groundwater within APC9 – SMBH14 and BH858 area***

- 9.3.14 Due to an intermittent presence of free phase hydrocarbons and hydrocarbon exceedances in this area, Horizon will undertake appropriate baseline and construction phase monitoring to provide confirmation that contamination concentrations remain stable or are reducing.

#### ***APC6, APC7a and APC20***

- 9.3.15 Prior to any activities which would cause significant ground disturbance taking place, a suitable ground investigation will be undertaken to provide information on the nature and extent of any contamination present so that appropriate risk assessments can be undertaken and remediation actions (where required) identified. If a suitable ground investigation has already been undertaken, regard must be had to the results prior to any further activities which would cause significant ground disturbance.

Figure 9-1 Remediation areas across the WNDA



## 9.4 Waste and materials management

- 9.4.1 All waste arising from the construction works will be managed in a responsible manner with the clear intention of applying Horizon's waste hierarchy and in line with all relevant waste legislation and regulations.
- 9.4.2 Horizon will implement its waste management arrangements before the construction works begin in accordance with the controls set out in the Wylfa Newydd CoCP.
- 9.4.3 The activities related to waste management that are relevant to the construction works include, but are not be restricted to:
- disposal of asbestos fragments from the processing activities of the remediation processing compound;
  - disposal of organic matter associated with invasive non-native species from the processing activities of the remediation processing compound;
  - disposal of sump, pipework and soils that are contaminated with trichloroethane;
  - disposal of soils and made ground contaminated with hydrocarbons;
  - disposal of contaminated silts that are not suitable for use;
  - disposal of blasting packaging materials;
  - disposal of contaminated sediments from any dewatering activities;
  - disposal of tyres, vehicles, plant, equipment, electrics, electronics and lighting in accordance with the suite of end of life regulations;
  - disposal of temporary structures and equipment associated with the Site Campus;
  - disposal of temporary structures and equipment associated with the compounds, manufacturing and fabrication areas;
  - disposal of temporary structures and equipment associated with the waste management and facilities management infrastructure;
  - disposal of operational wastes from the Site Campus; and
  - disposal of temporary fencing, lighting and associated cables.

## 9.5 Soil management

- 9.5.1 Topsoil from the Ecological Compensation Sites Cae Canol-dydd and Cors Gwawr will be stripped as per good practice construction and soil management techniques. The soils will be stored on-site for a maximum of three years under an Environmental Permit, prior to sustainable reuse. No soils would be stripped from Ty du.

9.5.2 Soil stockpiles at Cae Canol-dydd and Cors Gwawr will not exceed two metres in height in accordance with recommendations in BS 3882:2015 Specification for Topsoil [RD12].



## 9.6 Sites of geological importance

- 9.6.1 To mitigate potential effects resulting from excavations partially within the Porth Wnal Regionally Important Geological Site, Horizon will:
- install bilingual information boards at Wylfa Head on the GeoMôn geological trail in Cemaes to complement that installation and highlight the importance of the geology of the area (the Gwna Mélange in this area is the 'world type site', i.e. the benchmark for everywhere else);
  - facilitate access, via formal request to Horizon, to the site for geologists for geological study of exposed cliff faces at Porth Wnal (subject to works and safety requirements) as exposure of new rock during excavations may provide new insight into the geological setting; and
  - facilitate a Light Detection and Ranging (LiDAR) survey in the vicinity that will be undertaken of existing cliffs within the Porth Wnal Dolerite Regionally Important Geological Site prior to their destruction and access being restricted – this will enable future study/understanding of the setting of the site, including the part that will be lost.
- 9.6.2 To mitigate the potential effects of excavations in the Cemaes Bay Regionally Important Geological Site, a proposed new surface water drainage discharge point will utilise the concrete channel of an existing discharge pipe as far as practicable. This will limit any excavations to the local geology.

## 9.7 Control of radioactive sources

- 9.7.1 Control of radioactive sources is achieved through a combination of stringent management arrangements and supervision of the use of the sources to ensure all the requirements of the Ionising Radiation Regulations [1999/2017](#) are met. Horizon will ensure it understands at all times what sources are on the Power Station Site and where they are being used. When sources are not in use, they will be kept in secure source stores to prevent loss or damage.
- 9.7.2 Contingency plans for foreseeable incidents will be in place and the response to these plans will be rehearsed. It should be noted that radiography sources are commonly and safely used at major construction sites, and Horizon will adopt good practice with regard to managing these sources of radioactivity. Radiological conditions will remain under constant assessment by Horizon's Radiation Protection Advisors (appointed in compliance with the Ionising Radiation Regulations [1999/2017](#)) to ensure control at all times.

## 10 Water management strategy

### 10.1 General

- 10.1.1 Horizon's water management strategy is based on the controls set out in the Wylfa Newydd CoCP and any further controls set out in this sub-CoCP.
- 10.1.2 The general mitigation controls to be implemented for water management are described in section 10 of the Wylfa Newydd CoCP.
- 10.1.3 In addition, the measures below outline specific requirements to be implemented during the Main Construction works.

### 10.2 Surface water

#### *Buffer zones*

- 10.2.1 To protect surface waters, suitably demarcated buffer zones will be established adjacent to the following watercourses that have been identified as potentially most affected:
  - a 15m buffer zone along the Nant Cemlyn and Nant Cemaes where the watercourses cross the WNDA;
  - a 15m buffer around watercourses draining into Tre'r Gof SSSI; and
  - a 15m buffer zone along the Afon Cafnan and its main tributary (Nant Caerdegog Isaf).
- 10.2.2 Any temporary storage of waste vegetation rising from clearance on-site will not be located within 100m of Tre'r Gof or any other protected sites, to prevent surface water runoff of nutrients into Tre'r Gof.
- 10.2.3 For the watercourse realignment works on the Nant Caerdegog Isaf, a risk assessment method statement approach will be undertaken with relevant approval and consents for works from NRW.
- 10.2.4 Where unavoidable small-scale works are identified as being required within these buffer zones, detailed methodologies and risk assessments will be developed by Horizon that ensure those works can be undertaken without adversely affecting the designated areas or their special interest features. Examples of small scale works that may be required include installing appropriate types of fencing, vegetation management, appropriate drainage works and undertaking monitoring surveys within the buffer zones.

#### *Management of runoff and discharges into watercourses*

- 10.2.5 Appropriate drainage will be installed prior to Main Construction. This will include settlement ponds and appropriate treatment to manage flows and meet agreed water quality thresholds (Environmental Quality Standards). An application will be made for an Environmental Permit which will set limits on the concentration of substances which could be discharged to protect the receiving surface water.



- 10.2.6 Surface water runoff from exposed topsoil during construction and later from the newly formed landscape mounds will be managed by a treatment train of sustainable drainage system features. Sediment settlement ponds will be used in conjunction with other measures including silt traps, silt curtains, silt fences and vegetated channels. Ditches will be constructed around the base of the landscape mounds to allow flows to be captured and discharged to the drainage system. The discharge limit for suspended solids for each discharge point will be set in the construction Environmental Permit, with the limit set based on baseline conditions so that there would be no significant effect on the receiving water. The design has been prepared to meet a minimum treatment standard of between 40mg/l and 70mg/l total suspended solids (depending upon the background concentration in the receiving watercourse) during normal rainfall conditions. Chemical dosing may be required during the construction stage if there is insufficient settlement of solids in the settlement ponds (e.g. due to high flow rates).
- 10.2.7 There will be engineered containment for any fuel storage on-site during construction and operation, with the engineered facilities following good practice. Storage areas will be more than 15m away from watercourses and areas susceptible to flooding, and these storage areas would be suitably protected to avoid damage by plant and vehicles.
- 10.2.8 Foul water discharge will be to an existing Dŵr Cymru Welsh Water sewage treatment works and to the on-site package treatment plants. Foul water will not be discharged to the surface water environment.
- 10.2.9 Water will be pumped from the car park runoff system to a recharge trench along the boundary with Cae Gwyn SSSI. There will be no discharge of drainage from the construction areas to the Cae Gwyn SSSI.
- 10.2.10 Appropriate monitoring will be undertaken to determine if there is an effect on Tre'r Gof SSSI from dewatering and mounding activities. The monitoring will include continuous water level monitoring at selected groundwater monitoring boreholes with monthly or quarterly water level dips at others and quarterly water quality monitoring. Where practicable, existing boreholes will be used, although it is recognised that many of these will be lost during the construction works and some replacements may be required. The monitoring would include continuous monitoring of existing piezometers in Tre'r Gof and will build upon the existing baseline dating from June 2011.
- 10.2.11 If groundwater monitoring identifies an effect on the qualifying groundwater dependent terrestrial ecosystems at Tre'r Gof, additional mitigation options could include:
- controlling water loss from the site via the underground culvert at VN5 during critical periods to avoid the drying and oxidation of the peat body;
  - construction methodologies to reduce groundwater ingress to the Cooling water tunnels, e.g. by grouting major inflow fractures; and
  - recharging groundwater, particularly in areas potentially affected by dewatering during the construction period.

10.2.12 The monitoring and mitigation will be integrated with the wider adaptive water management mitigation within the Tre'r Gof catchment.

10.2.13 The mitigation measures proposed for the drainage on and from Mound E during the Earthworks phase are as follows.

- From the point of commencement of earthworks on the western side of Mound E, no water will be discharged into Nant Cemlyn (draining into the Cemlyn Lagoon) via discharge E1 until vegetation has re-established and the risk of sediment runoff is agreed (in writing) with NRW to be low.
- During the periods where there are no discharges to Nant Cemlyn, all water collected in the drainage network on the west side of Mound E will be diverted and discharged to Afon Cafnan via discharge E2.
- To inform understanding of the background variability in suspended sediment concentrations, baseline water quality monitoring in Nant Cemlyn will be agreed with NRW in writing prior to this monitoring being initiated. This will inform agreement on the water quality it will be appropriate to discharge into Nant Cemlyn from the western face of Mound E (i.e. on sediment runoff). The monitoring will commence and be undertaken for at least 12 months prior to the works commencing. Discharge will only be returned to the Nant Cemlyn when an agreed water quality threshold (or range) has been met.
- After the establishment of vegetation, if there are any additional bulk earthworks on the west of Mound E resulting in a risk of sediment runoff, overpumping will resume, along with monitoring of the Mound E discharges, and no water will be discharged into Nant Cemlyn until vegetation re-establishment has occurred and the proposal to discharge has been agreed in writing with NRW.
- When discharges are made to Nant Cemlyn, no polyelectrolyte dosing will be employed.

10.2.14 Horizon will produce a baseline water quality data set that is representative of the flow regime for both Nant Cemlyn and (in due course) Mound E before and during the Earthworks to help define the point in time or threshold at which it is appropriate to return water to the Nant Cemlyn.

10.2.15 The water quality monitoring proposals for Nant Cemlyn will include the following.

- Continuous flow discharge and turbidity monitoring (to allow sediment load and instantaneous concentration to be calculated) with additional storm event triggered auto-samplers.
- Monthly spot sampling of suspended sediment, turbidity and a range of chemical determinants (principally nutrients and metals). This is likely to include temperature, electrical conductivity, redox, dissolved oxygen, pH, alkalinity, ammoniacal nitrogen, calcium, chloride, dissolved solids, ionic balance, iron, magnesium, nitrate, nitrogen, orthophosphate, phosphorus, potassium, sodium and sulphate.

- Monthly spot flow monitoring and targeted river walkover (e.g. to determine whether and how field and road drains are discharging and consider sediment inputs).
- Event based sampling, prior to the Construction phase, to better characterise the sediment and hydrological regime (flow discharge and turbidity).

10.2.16 A monthly report will include information on antecedent weather conditions, a review of the performance of the monitoring network and data quality. The final report will include the hydrological and water quality data obtained (and a rainfall record), annotated plans, a performance review, a conceptual understanding of each site and any recommendations for continued monitoring.

10.2.17 Once overpumping is initiated, the drainage discharge from Mound E will be monitored between the outfall of the Mound E settlement pond and the point where it is mixed with the Afon Cefnallt water (i.e. either immediately before the pump(s), in the pipe or at the overpumping discharge point). The Mound E discharge monitoring will be designed to provide data that can be directly compared with data for the Nant Cemlyn. That is, the same determinants will be monitored as for the Nant Cemlyn, as well as the volume and timing of pumping. The monitoring will cover the quality and quantities of the discharge, and the characteristics of any dosing (e.g. frequency, timing, duration of dosing, plus the quantity used) in water overpumped only. It will occur for the duration of the overpumping (i.e. for at least a year during the Earthworks phase), and the full monitoring programme will continue until the point that it is agreed that it is acceptable to return the flow to the Nant Cemlyn (and the overpumping ceases), i.e. when the agreed threshold (water quality range) is met.

10.2.18 After this point, online turbidity monitoring (and bi-monthly manual sampling of TSS as a check on optical turbidity measures), supported by a protocol for surveillance and sampling should activities occur that could be a cause for concern or if the turbidity monitoring picks up a potential issue (to be agreed with NRW in advance), will continue, but the rest of the Mound E drainage monitoring programme will cease.

10.2.19 If possible, the water quality range within which water can be returned to Nant Cemlyn will be agreed with NRW before the start of the earthworks on Mound E. The following will be considered in determining this.

- The suspended sediment load of the discharge should demonstrate that the risk of sediment runoff from Mound E is low.
- The return threshold should match, or better, the range of ambient levels of suspended sediment in the Nant Cemlyn.
- When comparing data collected for Mound E and Nant Cemlyn, the relative performance of the two systems will need to be compared for both specific events and across the wider flow regime. Events which lead to high TSS spikes unrelated to ambient conditions (e.g. ploughed fields, cattle crossing, road runoff) will be discounted, unless it is determined

that they make an important contribution to the conditions of the lagoon that support its interest features.

- Ultimately, a qualitative assessment may need to be made, taking into account both the water quality data and the extent and development of re-established vegetation on the Mound.

10.2.20 The monitoring and mitigation process will be overseen by Hydrological and Ecological Clerks of Works employed throughout the construction process.

10.2.21 Prior to commencement of the authorised development, grazing would be excluded from the Cemaes catchment area (found within the WNDA) for four weeks, which would allow sufficient time for animal faeces to biodegrade naturally and reduce the risk of runoff containing E. coli and intestinal enterococci.

### ***Overarching Construction Drainage Scheme***

10.2.22 Prior to the commencement of the Power Station Works or Site Campus (except for Work No.12), Horizon will prepare and submit for approval an Overarching Construction Drainage Scheme for the WNDA in accordance with the Requirements in Schedule 3 and Schedule 244 of the Order. The Overarching Construction Drainage Scheme will be prepared in accordance with the drainage principles in sections 10 of this Wylfa Newydd CoCP and the sub-CoCP, as well as the drainage principles set out in section 4 of the LHMS. The scheme will also be in general accordance with construction landform drainage design drawings presented in Wylfa Newydd Development Area - Power Station Site Plans (Part 1 of 2) in Schedule 2 (Approved plans) and the general principles set out in Appendix D8-A of the Environmental Statement Addendum. The approved Overarching Construction Drainage Scheme (or any approved variations) will be implemented for the duration of the construction period.

10.2.23 Prior to the commencement of each phase of construction on the WNDA, Horizon will prepare a separate Construction Drainage Scheme for that phase in accordance with the approved Overarching Construction Drainage Scheme. These phased schemes will be implemented for the duration of the construction of that phase.

10.2.24 The Overarching Construction Drainage Scheme will not exacerbate any existing flood risk at Cemaes.

### ***Concrete batching plant specific requirements***

10.2.25 Water used in the concrete batching plant for plant wash-down, cleaning and other similar activities will be recycled where possible (estimated to be 90% of the water used). Any excess water will be tankered off-site for treatment and disposal at a permitted waste facility.

### ***Watercourse realignment works***

10.2.26 For the watercourse realignment works on the Nant Caerdegog Isaf, a risk assessment will be undertaken, with relevant detailed design approval and consents for works from NRW.

10.2.27 The watercourse realignment will be constructed using techniques to control sediment release. These may include:

- leaving a minimum 2m “plug” of uncut channel at either end of the new channel until all work is completed and the realigned section is ready to be connected to the existing stream;
- completing all works along the bank of the new channel prior to connecting to the existing channel;
- using plant with a low ground bearing capacity to avoid damage to newly dug banks;
- completing any revegetation as early as practicable to reduce the potential for sediment from bare areas moving into the completed channel;
- compacting the stream bed sufficiently to reduce the risk of substantial loose sediment to be entrained;
- removing the 2m plug from the downstream end prior to the upstream end;
- if flows are high, consider delaying connection; and
- pump water from upstream of the connection to downstream prior to breaking through, with gradual cessation in pumping once the connection is made.

10.2.28 The realignment works will be programmed approximately 12 months in advance of any backfilling, to ensure that vegetation along the realigned route would be established, with interim control of flows, prior to full connection of diverted flows to the new route. Backfilling of the old watercourse route will not commence until the diverted route has been sufficiently established as determined by the detailed design referred to in 10.2.26.

### **10.3 Monitoring, surveys and mitigation**

10.3.1 Pre-construction building surveys and monitoring during construction will be carried out to determine the need for further mitigation in relation to any reduction in groundwater levels due to dewatering bringing about the potential for building subsidence to the Existing Power Station buildings. Options for further mitigation, as appropriate, will be discussed and agreed with Magnox.

10.3.2 Monitoring of the water environment will continue across the WNDA up to the start of construction in order to improve the robustness of the baseline data. These monitoring data will then be used during detailed design to refine the drainage system to reduce potential effects on watercourse catchments in the WNDA. Active management of the drainage system will include monitoring of every discharge point (a mixture of *in situ* sampling and laboratory analysis) and monitoring upstream and downstream of all outfall points to surface watercourses.

- 10.3.3 Frequency of monitoring will be a mix of continuous (using turbidity meters), daily, weekly or monthly and dependent on the nature of the works and the weather (e.g. mounding would increase demands) but will continue into operation. Depending on the findings, additional mitigation may be required as agreed with the regulator. Options could include:
1. implementing dosing using polyelectrolytes;
  2. installation of additional treatment capacity;
  3. greater manual intervention/management of the system;
  4. new drainage channels;
  5. new pumping systems; and
  6. automated treatment and/or pumping systems.
- 10.3.4 The drainage system will be designed to be as flexible as possible within the constraints of the current and future topography. This would allow changes to be made relatively easily and increase the potential for baseline conditions to be matched.
- 10.3.5 Appropriate monitoring will be undertaken to determine if there is an effect on private water supplies from dewatering activities. The monitoring will include continuous water level monitoring at selected groundwater monitoring boreholes with monthly or quarterly water level dips at others. Where practicable, existing boreholes will be used, although it is recognised that many of these will be lost during the construction works and some replacements may be required. Monitoring of the private water supplies will take place where necessary. Depending upon the findings of the monitoring, additional mitigation may be required. Options for additional mitigation could include:
1. providing the property with water from a tanker during construction;
  2. drilling the water supply well deeper/drilling a new supply well; and
  3. providing the property with mains supply.
- 10.3.6 Appropriate monitoring will be undertaken to determine if there is an effect on Cae Gwyn SSSI. The monitoring will include continuous water level monitoring at selected groundwater monitoring boreholes with monthly or quarterly water level dips at others. Where practicable, existing boreholes will be used, although it is recognised that many of these will be lost during the construction works and some replacements may be required. The monitoring would include continuous monitoring of existing piezometers in Cae Gwyn if land access is granted. If the monitoring identifies an effect, additional mitigation options could include:
1. grouting major inflow fractures; and
  2. artificial recharge.

### ***Cae Gwyn SSSI Hydro-ecological Monitoring Scheme***

- 10.3.7 Prior to the commencement of the Power Station Works or Site Campus (except for Work No.12), Horizon will prepare and submit for approval a Cae Gwyn SSSI Hydro-ecological Monitoring Scheme in accordance with the

Requirements in Schedule 3 and Schedule ~~[24]~~4 of the Order. The Cae Gwyn SSSI Hydro-ecological Monitoring Scheme will be prepared in accordance with the principles set out in sections 10 and 11 of this Main Power Station Site sub-CoCP. The approved Cae Gwyn SSSI Hydro-ecological Monitoring Scheme (or any approved variations) will be implemented for the duration of the construction period.

10.3.8 Appropriate monitoring will be undertaken to determine if there is an effect on ~~Tre'r Gof~~Cae Gwyn SSSI. The monitoring will include continuous water level monitoring at selected groundwater monitoring boreholes with monthly or quarterly water level dips at others. Where practicable, existing boreholes will be used, although it is recognised that many of these will be lost during the construction works and some replacements may be required. The monitoring will include continuous monitoring of existing piezometers in ~~Tre'r Gof~~Cae Gwyn SSSI. If the monitoring identifies an effect, additional mitigation options could include:

1. controlling water loss via the underground culvert at VN5 during critical periods;
2. employing alternative construction methodologies to reduce groundwater ingress to the cooling water tunnels and other excavation; and
3. recharging groundwater.

### ***Tre'r Gof SSSI Hydro-ecological Monitoring and Mitigation Scheme***

10.3.9 Prior to the commencement of the Power Station Works or Site Campus (except for Work No.12), Horizon will prepare and submit for approval a Tre'r Gof SSSI Hydro-ecological Monitoring and Mitigation Scheme in accordance with the Requirements in Schedule 3 and Schedule ~~[24]~~4 of the Order. The Tre'r Gof SSSI Hydro-ecological Monitoring and Mitigation Scheme will be prepared in accordance with the principles set out in sections 10 and 11 of this Main Power Station Site sub-CoCP. The approved Tre'r Gof SSSI Hydro-ecological Monitoring and Mitigation Scheme (or any approved variations) will be implemented for the duration of the construction period.

10.3.10 Appropriate monitoring will be undertaken to determine if there is significant saline intrusion into the aquifer. The monitoring will include continuous water level monitoring at selected groundwater monitoring boreholes with monthly or quarterly water level dips at other locations and quarterly water quality sampling (for major ions) at selected locations. Monitoring of sump water quality (for major ions) would also be undertaken on a monthly or quarterly basis. Where practicable, existing boreholes will be used, although it is recognised that many of these will be lost during the construction works and some replacements may be required. If a significant effect is identified, additional mitigation may be required. Options could include:

1. grouting major inflow fractures; and
2. altering pumping regime.



10.3.11 Appropriate monitoring will be undertaken to determine if there is a significant departure from baseline conditions regarding rainfall/runoff response in watercourses. The monitoring will include continuous flow monitoring at existing surface water monitoring locations with weekly, monthly or quarterly spot flow measurements at other locations. If a significant effect is identified, then additional mitigation may be required. Options could include:

1. artificial recharge;
2. direct recharge to watercourses;
3. changes to drainage system; and
4. sealing of fractures in excavations.

10.3.12 Appropriate monitoring will be undertaken to determine if there is a significant departure from baseline conditions with regards the flow regime in watercourses affecting fluvial geomorphology. The monitoring will include continuous flow monitoring at existing surface monitoring points with weekly, monthly or quarterly spot gauging at other locations. Where monitoring identifies a significant effect, additional mitigation may be required. Options could include:

1. changes to drainage system including outfalls; and
2. channel and/or stream bank modification.

10.3.13 Quarterly monitoring will be undertaken prior to and during the installation of the cooling water tunnels in the area to the north-east of the Existing Power Station where hydrocarbons have previously been detected in groundwater. Where practicable, existing boreholes will be used. If the monitoring identifies that the proposed installation of the cooling water tunnels will lead to a statistically significant increase in contaminant levels compared to baseline, additional mitigation would be required and agreed with the regulator. Options could include:

1. detailed quantitative risk assessment to provide further information on the risk posed by the changes in concentration; and
2. remediation of groundwater using an appropriate technique to reduce contaminant concentrations.

## 11 Ecology and landscape management strategies

### 11.1 General

- 11.1.1 Key landscape elements and habitats within the WND A will be managed according to principles set out in the Landscape and Habitat Management Strategy and Design and Access Statement Volume 1 – Project-wide and Volume 2 – Power Station Site.
- 11.1.2 Other general mitigation controls to be implemented for ecology and landscape are described in section 11 of the Wylfa Newydd CoCP, with further site-specific measures that are not included in the Landscape and Habitat Management Strategy and Design and Access Statement Volume 1 – Project-wide and Volume 2 – Power Station Site set out within this sub-CoCP.

### 11.2 Site management

- 11.2.1 Enabling Works (such as vegetation clearance and dry stone wall removal) will be carried out in a directional manner as far as reasonably practicable to encourage movement of mobile ecological receptors towards the Notable Wildlife Enhancement Site and the Reptile Receptor Site, located to the west of the of the WND A, and discourage their movement towards features such as the A5025 road or residential areas of Cemaes.
- 11.2.2 Vegetation clearance will involve the management of other vegetation to ensure that it is no higher than 50mm above ground level.
- 11.2.3 In addition to the general duties set out in section 11.2 of the Wylfa Newydd CoCP, the duties of the ECoW team will include protecting the retained ecological receptors within the WND A, including 'Wardening' of Wylfa Head to ensure that habitats in that area are not damaged by any leisure activities.

### 11.3 Boundary fencing

- 11.3.1 To facilitate the safe passage of animals away from the WND A and to reduce the effects of habitat severance, boundary fencing will be permeable to small-mammal movement.
- 11.3.2 Weekly inspections will be undertaken of ecological fences close to watercourses. Any flood debris identified during inspections will be removed when safe to do so.

### 11.4 Mitigation of effects on terns

#### *General*

- 11.4.1 Horizon will monitor the Cemlyn Lagoon tern colony from early March during each year of the Wylfa Newydd DCO Project Main Construction phase in order to record the arrival of black-headed gulls and terns to establish a breeding colony.

## **Definitions**

- 11.4.2 The 'tern breeding period' is the period from the date on which the first terns begin to establish nests at the Cemlyn Lagoon tern colony (the start date) until the point where late or second nesting tern chicks fledge and terns begin to leave the colony. These dates are anticipated to be 15 April to 15 August but will vary on an annual basis to take account of early or late arrivals and departures. Such variations are to be agreed with the NWWT site managers and NRW. Nest establishment will be defined as activities that constitute the establishment of nesting territories by any tern species that is a qualifying feature of the Morwenoliaid Ynys Môn/Anglesey Terns Special Protection Area, these being aerial display flights over the nesting islands and/or courtship behaviour on the ground by scrape making.
- 11.4.3 The 'establishment period' is the period from the start of substantive colony wide breeding activity until the earlier of:
- i) four weeks from the start of the period; or
  - ii) the date on which more than fifty percent (>50%) of the Sandwich terns expected to be present in the colony are considered to have begun egg-laying and be sitting on nests.
- 11.4.4 Due to the importance of black-headed gulls in establishing the Cemlyn Bay tern colony, ~~from early March,~~ if the Cemlyn Lagoon colony observers determine that their nesting behaviour appears to be affected by construction noise (if there is a lack or low numbers (based on black-headed gull status and trends) of recorded black-headed gull nesting attempts), ~~the 'tern breeding period' mitigation measures will be implemented earlier than~~ the start date shall be deemed to be the date such determination by the Cemlyn Lagoon colony observers is notified to and confirmed by the ECoW.

## **Noise controls throughout the Main Construction phase**

- 11.4.5 In the breeding seasons that occur during Main Construction, the following noise levels will apply.
- 11.4.6 During the tern breeding period:
- Blasting on the site will only be undertaken when, accounting for wind factors, noise shielding and other mitigation, the predicted blast noise at the colony will be less than 60dB or daily ambient noise at the colony (whichever is higher). This may require blast sizes to be reduced in certain weather conditions.
  - Day-time construction noise at the Cemlyn Lagoon tern colony will not exceed 59dB  $L_{Aeq, 1\text{-hour}}$ .
  - Night-time (to be defined in line with working hours) construction noise at the Cemlyn Lagoon tern colony will not exceed 43dB  $L_{Aeq, 1\text{-hour}}$ .
- 11.4.7 During the establishment period:
- Blasting on the site will only be undertaken when, accounting for wind factors, noise shielding and other mitigation, the predicted blast noise at

the Cemlyn Lagoon tern colony will be less than 55dB  $L_{AF,max}$  or the ambient noise at the colony (whichever is higher).

- Day-time construction noise at the Cemlyn Lagoon tern colony will not exceed 55dB  $L_{Aeq, 1-hour}$  or the daily ambient noise at the colony (whichever is higher).

### ***Meeting committed noise levels***

11.4.8 During the tern breeding period, noise levels will be monitored at the Cemlyn Lagoon tern colony through direct monitoring on the islands or extrapolated calculations based on monitoring at nearby locations.

11.4.9 These noise levels will be monitored against action thresholds (amber and red), which are to be defined according to the noise thresholds set out below (with amber being a noise level sufficiently below the agreed red threshold to enable mitigation action to be taken before an exceedance occurs). Where noise levels (based on hourly averages) reach the amber action threshold, the following steps will be taken.

- Review of the real-time monitoring data will be undertaken straight away by the ECoW responsible for this monitoring (who will be in contact with the colony observers) to confirm that the monitored levels are not being impacted by other noise or vibration sources not connected to the Wylfa Newydd DCO Project.
- Once confirmed, the assigned site manager will be immediately notified that an action level has or is about to be exceeded. An action plan will be agreed with the onsite management team (to include the Site Director and ECoW).
- The assigned site manager who will be appointed by the Site Director, will review the works and working strategy in the areas determined to be contributing to the amber level exceedance and consider possible mitigation actions, should these be determined to be necessary.
- Mitigation measures to keep the noise within the acceptable specified level at the receptors will be identified and the action plan initiated within 40 minutes of the amber threshold being exceeded. This may include:
  - maintaining the status quo and not allowing any additional activities to take place;
  - plant/equipment substitution;
  - adjusting the scheduling of the works;
  - adjusting the intensity of the works;
  - adopting alternative construction methodologies; and
  - temporary relocation of certain activities.
- The decision-making process on the mitigation measures to be applied will be guided by safety considerations, amongst others, as well as the

availability of equipment and potential impacts on other environmental receptors, and the overall construction programme.

- The appropriate site managers will ensure that the selected mitigation measures are implemented, noting that, for any construction activity to be halted, an assessment first needs to be undertaken regarding whether the works are stable, and it is safe to do so (i.e. some works may need to be completed before they can be stopped); in some cases this will affect the time taken to alter working practices.
- Monitoring will continue to verify that the control measures have reduced the noise levels to an acceptable level at the relevant receptors.

11.4.10 Any breach of the committed noise levels (the red action thresholds set out above) will be reported by the responsible ECoW to the Site Director and, once a month, a 'breach report' will be provided to Horizon's senior management team and to NRW along with commentary on the action taken to remedy the breach and the observed response (if any) of the terns.

### ***Reactive monitoring***

11.4.11 In addition to the measures set out above, during the tern breeding period the colony will be continuously observed by trained observers, who will be professional, independent ornithologists with a detailed knowledge of terns, during daytime working hours. If the observers determine that 'fly up' responses appear to be associated with Wylfa Newydd DCO Project activities, the following actions (as per the mitigation procedures set out above) will be taken.

- The Wylfa Newydd DCO Project activities responsible for the tern 'fly-ups' will be identified (based on matching acoustic signatures with site activities).
- Site activities will be reviewed to identify what alterations can be made (e.g. change in work intensity, schedules or methods, or additional noise abatement).
- Alternatives will be adopted where they are assessed as being safe and practicable.
- Monitoring will continue in an effort to better understand and control the causes of previous Wylfa Newydd DCO Project related tern 'fly-ups'.

11.4.12 The above protocol will be implemented by the site management team, who will have full knowledge of the construction activities being undertaken and the authority to instigate the control measures deemed to be necessary.

### ***Disturbance at the breeding tern colony from visual stimuli***

11.4.13 During the establishment period, there will be no construction works undertaken within 500m of the nesting islands and the areas on the shingle ridge that are known to be used occasionally by nesting terns. This period encompasses the main pre-laying and nest establishment period for all three tern species at Cemlyn Bay. Thereafter, there will be no bulk

earthworks undertaken within 500m of any known active tern nests within the Morwenoliaid Ynys Môn/Anglesey Terns Special Protection Area.

11.4.14 During the establishment period, Horizon will only undertake works on the far side of Mound E that are not visible from the Cemlyn [Lagoon](#) tern colony and minimise reworking of material placed in this area.

## 11.5 Reptiles

11.5.1 Pre-construction surveys will be carried out under the supervision of an ECoW. Dependent on the results of those surveys, one or more of the following three approaches will be employed which are in line with relevant good practice guidance [[RD42RD13](#)]:

- active trapping and translocation of individuals (likely to be employed in areas of high quality reptile habitat, and known hotspots for reptiles);
- destructive search of habitats by an ECoW (likely to occur in complex habitats such as drystone walls and cloddiau, and in high quality reptile habitat); or
- supervision of habitat clearance by an ECoW.

11.5.2 Following relocation/displacement, capture-mark-recapture techniques will be employed:

- biennially at and near the receptor site and displacement areas for the duration of the construction period; and
- biennially at the above areas and at restored habitats/key corridors for the post-construction monitoring period (10 years minimum).

11.5.3 The standard presence/absence surveys will also be employed every other year at the above locations.

## 11.6 Specific receptors

11.6.1 Notable mammals predominantly give birth in the period between March and August and so will be protected by the good practice mitigation designed to protect breeding birds. However, brown hare can give birth as early as February, and hedgehog can have a late birthing peak in September. An ECoW will supervise the clearance of any habitats with high potential to support juvenile or pregnant brown hare and hedgehog in February and September (respectively).

11.6.2 Fish rescue will be carried out during the removal of freshwater habitat, such as the realignment of Nant Caerdegog Isaf. Fish will be returned to suitable habitat in the same waterbody unaffected by the works. No fish will be moved between waterbodies. The achievement criteria will be a fish rescue with zero incidents of injury or mortality. Fish rescue will be undertaken by accredited and suitably qualified fisheries scientists.

## 11.7 Ecological Compensation Sites

- 11.7.1 Horizon is committed to delivering a compensation package, in order to offset a potential adverse effect on Tre'r Gof SSSI, which will create new areas of rich-fen habitat and enhance areas of existing rich-fen habitat at three sites on Anglesey.

### *Landscape and Habitat Management Schemes*

- 11.7.2 Horizon will prepare and submit for approval Landscape and Habitat Management Schemes for each site in accordance with the Requirements in Schedule 3 of the Order. The content of these schemes will be developed in line with the principles set out in the Landscape and Habitat Management Strategy.
- 11.7.3 In order to manage environmental risks during construction, works will adopt an 'adaptive management' approach, including but not limited to the following:
- phasing of works, with incremental changes to topsoil stripping, drainage and other works, over two seasons;
  - monitoring on and off-site before, during and following works;
  - adaptive management of water flows; and
  - enhanced revegetation, for example by planting or using nursery crops.
- 11.7.4 The above approach will allow for any issues to be identified and resolved as and when they arise. In addition to mitigating potential impacts, an adaptive approach will enable a responsive approach to habitat creation and enhancement, ensuring greater success of the compensation proposal. The adaptive management design, including triggers for instigating measures and assessing their performance, will be provided as part of detailed design.

## 11.8 Ancient woodland

- 11.8.1 Topsoil, coppice stools and timber from felled trees supporting the rare *Ramalina fraxinea* lichen will be translocated to a receptor site identified on Horizon-owned land.

## 11.9 Trees

- 11.9.1 Prior to the commencement of the authorised development, existing tree surveys, within appendix C of the Landscape and Habitat Management Strategy will be reviewed and if necessary updated, in accordance with BS 5837:2012 [[RD13RD14](#)].

## 11.10 Red squirrel

- 11.10.1 Pre-construction surveys will be carried out by an ECoW. If pre-construction surveys confirm the presence of active red squirrel dreys within, or immediately adjacent to, trees that will be felled, felling works will



be delayed to avoid the period when pre-weaned young are present (potentially mid-February to mid-September<sup>15</sup>).

11.10.2 Additional mitigation for red squirrel will comprise providing artificial nest boxes within Dame Sylvia Crowe's Mound (maximum of 10 boxes), plus supplementary food provision (on a monthly basis during the construction period). Annual monitoring will be undertaken in the Dame Sylvia Crowe's Mound during the construction period.

## 11.11 Chough

11.11.1 As set out in section 7 of the Landscape and Habitat Management Strategy, Horizon will provide optimal foraging habitat for chough within the retained habitat on Wylfa Head.

11.11.2 In addition, monitoring of chough foraging behaviour during the breeding and non-breeding season would take place on areas of optimal chough foraging habitat within the WNDA.

11.11.3 Horizon will work with interested stakeholders to inform the wider population about the sensitivities and legal protection related to chough nesting. This period is typically March and April.

11.11.4 Information on the designation and sensitivity of Wylfa Head, particularly around chough and their nestings (including their legal protection) will be provided in Site Campus worker information packs.

## 11.12 Mud snail

11.12.1 Mud snails will be translocated to an existing wetland within the Notable Wildlife Enhancement Site.

11.12.2 Horizon will conduct monitoring of the translocated mud snail population for five years following translocation to understand viability. The first year will include water quality monitoring at the translocation site.

## 11.13 Great crested newt

11.13.1 Horizon's ECoW will conduct pre-construction great crested newt surveys in order to identify the great crested newt population size for the application of a European Protected Species Mitigation Licence.

11.13.2 Horizon will conduct great crested newt monitoring surveys during years one, three and six following translocations using the methods listed below:

- Habitat Suitability Index Survey, following the method outlined in Oldham *et al.* [RD14RD15]; and
- two torch counts during the appropriate season.

## 11.14 Water vole

11.14.1 Pre-construction surveys will be completed by an ECoW before any works in close proximity to habitats with the potential to support water vole. If required, avoidance measures will involve the micro-siting of works to not

disturb places of water vole shelter or refuge. Should this not be possible, NRW will be consulted with regard to the need to obtain a Conservation Licence to allow works to go ahead.

- 11.14.2 Horizon will conduct water vole monitoring surveys in years one, three and six following the diversion of the Nant Caerdegog Isaf watercourse.

## **11.15 Otter**

- 11.15.1 Pre-construction surveys will be completed by an ECoW before any works in close proximity to habitats with the potential to support otter. If required, avoidance measures will involve the micro-siting of works to not disturb areas including any otter holts or laying-up sites. Should this not be possible, NRW will be consulted with regard to the need to obtain a European Protected Species Mitigation Licence to allow works to go ahead.

## **11.16 Bats**

- 11.16.1 The programme for building demolition will be dependent on the latest ecological survey information from pre-construction surveys and site ecological inspections. Removal of roof coverings will be undertaken outside of the bats' hibernation/breeding/maternity seasons under the supervision of the appointed licenced ecologists/ECoW, following the approval of a bat licence.
- 11.16.2 A mobile elevated work platform (or other suitable means) will be used to access the roofing and slating, and felt will be removed to uncover the building and render the structure uninhabitable for bats. Demolition works involving known roosts will be conducted using 'soft-stripping' and 'hand-demolition' techniques between the months of March and June and September and October in accordance with good practice guidelines. These works will be supervised by an ECoW who holds the relevant bat licence to capture any bats found and remove them to one of the bat barns or pole mounted bat boxes provided as part of the European Protected Species Mitigation Licence.
- 11.16.3 With respect to trees, pre-felling surveys will be undertaken the season prior to felling to identify known or potential tree roosts. Trees that require felling with confirmed bat roosts will be felled under a European Protected Species Mitigation Licence. Trees with unconfirmed roosts, but high roost potential, would be soft felled (following an updated pre-felling survey immediately prior to felling) in the presence of an ECoW who holds the relevant bat licence to capture any bats found and remove them to one of the bat barns or pole mounted bat boxes provided as part of the European Protected Species Mitigation Licence.
- 11.16.4 Horizon will conduct 10 years of bat monitoring surveys across a 15-year period, to ensure that monitoring extends beyond the construction period. This will comprise, for example, five annual visits followed by five biennial visits.

### ***Mitigation for bats during demolition work***

- 11.16.5 To compensate for the loss of potential roost features due to building demolition and tree felling, an appropriate number of bat boxes will be hung within an area of retained woodland to the east of the Power Station. The exact number and locations of the bat boxes will be determined by the ECoW at the time of their erection, but will be positioned to increase the likelihood of them being used by bats, providing a range of roosting conditions and allowing for effective monitoring. In total Horizon propose to install 60 bat boxes in suitable locations across the main site. The boxes will be installed prior to commencement of building demolition and tree felling. Annual monitoring and replacement of damaged or missing boxes will be undertaken throughout the duration of the construction period.

## **11.17 Barn owl**

- 11.17.1 Pre-construction surveys will be completed by an ECoW before any works commence in close proximity to habitats with the potential to support barn owl, in keeping with the measures set out in section 11.2 of the Wylfa Newydd CoCP. This will include pre-demolition checks for structures identified for demolition.
- 11.17.2 Four barn owl nesting boxes will be provided prior to construction activities to mitigate the possible effects of disturbance to breeding roosts as follows. Occasional barn owl roosts that will be lost at Tyddyn-Gele and The Firs will be replaced through the provision of two barn owl boxes. A further two barn owl boxes will be provided to mitigate possible disturbance to roosts at Caerdegog Isaf and Cafnan Farm. Annual monitoring of each nesting box will be undertaken during the construction period, as well as the existing barn owl tower and barn owl barn.

## **11.18 Effects of air quality on Tre'r Gof SSSI**

- 11.18.1 To reduce the effects of air quality change and to supplement the ongoing management of the Tre'r Gof SSSI, a regime of annual cutting of vegetation will be implemented during construction to reduce the increased biomass which is predicted to occur as a result of increased nitrogen deposition. Studies have shown this to be an effective technique to reduce nitrogen levels and to control competitive graminoid species outcompeting less-nutrient-tolerant species.
- 11.18.2 As set out in the Wylfa Newydd CoCP, Horizon will carry out botanical monitoring at Tre'r Gof SSSI to identify potential hydrological and air quality impacts.

## **11.19 Buffer zones around sensitive ecological receptors**

- 11.19.1 To protect the most sensitive receptors, no construction works will take place within the boundary of either the Tre'r Gof SSSI or the Cae Gwyn SSSI. Furthermore, to protect these features and other sensitive receptors, suitably demarcated buffer zones will be established.

- For the north and west of the Tre'r Gof SSSI adjacent to the Site Campus, the buffer zone will be 20m.
  - To the south of the Tre'r Gof SSSI, the buffer zone will be established at 50m.
  - For the more sensitive eastern end of the Tre'r Gof SSSI, the buffer zone will be established at 100m.
  - There will be a 15m buffer zone along the boundary ditch flowing into the Cae Gwyn SSSI, separating construction activities from the designated habitats.
  - Buffers around bat barns will be a minimum of 10m. Appropriate planting within this zone is required. This will be a hard buffer, with no works within it. The screening along the buffer zone will be proportionate to the potential noise and disturbance effects anticipated. Construction activities in areas adjacent to the buffer will reduce noise and visual disturbance, as far as practicable. These controls apply to the two existing bat barns as well as the two proposed ones.
- 11.19.2 These buffer zones will protect the habitats of the SSSIs from effects likely to occur as a result of being adjacent to construction works (e.g. small-scale runoff or fugitive dust deposition).
- 11.19.3 Where practicable, no storage areas, vegetation clearance or construction will take place within the SSSI buffer zones.
- 11.19.4 Where unavoidable small-scale work is required to be undertaken within SSSI buffer zones, detailed methodologies and risk assessments will be developed by Horizon to ensure those works can be undertaken without adversely affecting the designated areas or their interest features. Small scale works might comprise installing appropriate types of fencing, vegetation management, appropriate drainage works or monitoring surveys. Methodologies and risk assessments for the small-scale works will be agreed with NRW prior to commencement.

## **11.20 Additional landscape and visual mitigation**

- 11.20.1 Landscape management for the duration of Main Construction will be in line with the requirements of this sub-CoCP and the Landscape and Habitat Management Strategy. This will include controls for management and enhancement.
- 11.20.2 Landscape management during construction will include controls for the management and enhancement of retained trees, scrub and hedgerows, stone walls, cloddiau and watercourses from the area of Dame Sylvia Crowe designed woodland and new areas of landscaping to completed areas of landscape mounding and the control of unwanted plant species including invasive species.

### ***Field boundaries***

- 11.20.3 Horizon will complete a mapped record and register of field names within the WNDA site, where information is readily available.
- 11.20.4 A detailed survey will be undertaken of stone wall and cloddiau construction (vernacular detailing) and hedgerow/tree species for field boundaries to be removed, to help ensure a degree of authenticity and historical continuity in the reinstatement of these features as part of the final landscape scheme. This will cover the landscape elements that are to be retained as well as removed.
- 11.20.5 Stone will be saved from stone walls and cloddiau dismantled during Work No.12, so as to support the reconstruction and reinstatement of the characteristic landscape features removed during the works, in-line with the Landscape and Habitat Management Strategy.

### ***Protection of existing vegetation***

- In accordance with the Wylfa Newydd CoCP, root protection areas of trees and vegetation will be determined by an arboriculturist and protected by establishing appropriate buffers that will be maintained throughout construction within the WNDA, including construction of laydown areas. Establishment of buffer areas will take into account the recommendations of BS 5837:2012 *Trees in relation to design, demolition and construction* [RD14RD15] and verified and monitored by an arboriculturist. Works within tree root protection areas will be avoided wherever practicable. If works within the root protection area of trees to be retained are deemed essential, works will be carried out using techniques provided in BS 5837:2012 [RD14RD15], and the duration of those works will be restricted as far as possible. This includes all retained trees, scrub and hedgerows within the Valley Garden of Cestyll Garden, Dame Sylvia Crowe's Mound and areas of retained ancient woodland.
- 11.20.6 In addition to the above, Dame Sylvia Crowe's woodland root protection areas will be demarcated with appropriate fencing.

### ***Woodland felling***

- 11.20.7 Phased timing of woodland felling will be implemented in the vicinity of the remediation processing compound, as far as is practicable, to allow existing woodland to provide temporary screening whilst the asbestos treatment area is in use.

### ***Architectural mitigation***

- 11.20.8 The detailed designs of temporary structures (such as colour, finishes and storey height) will have regard to landscape and visual effects and will be informed by the design principles set out in the Design and Access Statement Volume 1 – Project-wide and Volume 2 – Power Station Site.
- 11.20.9 The design of temporary buildings within the site compound and construction/laydown areas will seek to mitigate the visual impact of those

buildings on the surrounding areas through the use of visually recessive colours, finishes and heights.

- 11.20.10 A visually recessive perimeter fence colour will be selected to reduce visual effects, whilst still maintaining a safe and secure barrier.

***Cabin heights***

- 11.20.11 Cabin heights will be restricted to one storey for the main site compound for Work No. 12 activities only.

## 12 Cultural heritage management strategy

### 12.1 General

- 12.1.1 Horizon's cultural heritage management is based on the controls set out in the Wylfa Newydd CoCP and any further controls set out in this sub-CoCP.
- 12.1.2 The general mitigation controls to be implemented for cultural heritage are described in section 12 of the Wylfa Newydd CoCP.

#### *Air quality effects on Cestyll Garden*

- 12.1.3 Air quality modelling has identified possible exceedance for NOx at Cestyll that may affect vegetation and therefore the value of Cestyll Garden. Horizon will work with the landowner to implement appropriate monitoring of soil pH and a visual inspection of the condition of plants during the bulk earthworks of the construction period.

#### *WNSA Archaeological Mitigation Scheme*

- 12.1.4 Prior to the commencement of the Power Station Works (except for Work No. 12), Horizon will prepare and submit for approval a WNSA Archaeological Mitigation Scheme (including a Written Scheme of Investigation) in accordance with the Requirements in Schedule 3 and Schedule 244 of the Order. The WNSA Archaeological Mitigation Scheme will be prepared in accordance with the principles set out in section 12 of the Wylfa Newydd CoCP and section 12 of this Main Power Station Site sub-CoCP. The approved WNSA Archaeological Mitigation Scheme (or any approved variations) will be implemented for the duration of the construction period.
- 12.1.5 Table 12-1 sets out the potential treatments of identified cultural heritage assets, to be agreed as part of the WNSA Archaeological Mitigation Scheme.

**Table 12-1 Example mitigation treatment per cultural heritage asset**

Asset	Mitigation
Rhwng y Dau Fynydd Burnt Mound (Asset 71)	Archaeological excavation of the heritage asset. Excavation will be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [RD45RD16] and a Written Scheme of Investigation (WSI) agreed with the IACC.
Rhwng y Dau Fynydd Enclosure (Asset 209)	Strip, map and sample (stripping of an area, plotting observed features onto a site plan and then partially excavating those features (sampling)), will be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [RD45RD16] and a WSI agreed with the IACC.



Asset	Mitigation
Possible burnt mound, Cafnan (Asset 212)	Strip, map and sample would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <a href="#">RD15RD16</a> ] and a WSI agreed with the IACC.
Possible burnt mound, Neuadd (Asset 311)	Archaeological excavation of the heritage asset. Excavation will be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <a href="#">RD15RD16</a> ] and a WSI agreed with the IACC.
Possible burnt mound (west) (Asset 515)	Strip, map and sample would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <a href="#">RD15RD16</a> ] and a WSI agreed with the IACC.
Possible burnt mound (east) (Asset 516)	Strip, map and sample would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <a href="#">RD15RD16</a> ] and a WSI agreed with the IACC.
Pennant burnt mound and possible settlement site (Asset 520)	Archaeological excavation of the heritage asset. Excavation will be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <a href="#">RD15RD16</a> ] and a WSI agreed with the IACC.
Linear anomalies and burnt mounds (Asset 528)	Strip, map and sample would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <a href="#">RD15RD16</a> ] and a WSI agreed with the IACC.
Prehistoric settlement and medieval or later field system (Asset 530)	Strip, map and sample would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <a href="#">RD15RD16</a> ] and a WSI agreed with the IACC.
Pits and linear features 1, Ty-croes (Asset 531)	Strip, map and sample would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <a href="#">RD15RD16</a> ] and a WSI agreed with the IACC.
Prehistoric pits, Tyddyn-Goronwy (Asset 532)	Strip, map and sample would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute

Asset	Mitigation
	for Archaeologists [ <a href="#">RD15RD16</a> ] and a WSI agreed with the IACC.
Ring gully and pits, Pennant (Asset 534)	Strip, map and sample would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <a href="#">RD15RD16</a> ] and a WSI agreed with the IACC.
Tregele Romano-British Enclosure (Asset 540)	Archaeological excavation of the heritage asset. Excavation will be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <a href="#">RD15RD16</a> ] and a WSI agreed with the IACC.
Burnt mound and ditch system, Groesfechan (Asset 546)	Strip, map and sample would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <a href="#">RD15RD16</a> ] and a WSI agreed with the IACC.
Pont Cafnan Farm outbuildings (Asset 173)	A photographic survey will be undertaken, in accordance with the photographic survey for planning purposes guidance from Gwynedd Archaeological Planning Service [ <a href="#">RD16RD17</a> ] and <i>Understanding Historic Buildings: A Guide to Good Recording Practice</i> [ <a href="#">RD17RD18</a> ], to provide a permanent visual record of this heritage asset and its setting in advance of Site Preparation and Clearance Works.
Cafnan House and outbuildings (Asset 181)	Photographic survey will be undertaken to record the current setting of this heritage asset. Historic landscape recording will also be undertaken to Level 2 standards [ <a href="#">RD18RD19</a> ]. This will provide a drawn and photographic record of the setting of Cafnan House and outbuildings in its current form and condition.
Tyddyn-Gele, garage and outbuildings (Asset 263)	Level 3 historic building recording will be undertaken to provide a permanent documentary (written, drawn and photographic) record of historic buildings in their current form and setting.
Felin Cafnan Corn Mill, Porth y Felin (Asset 137)	A historic building survey will be undertaken to a Level 4 standard [ <a href="#">RD17RD18</a> ]. This will provide a written, drawn and photographic record of this heritage asset. A dilapidation survey will also be undertaken prior to commencement of construction works authorised by the DCO and once works are completed.
Corn drying house at Felin Cafnan (Asset 141)	A historic building survey will be undertaken to a Level 4 standard [ <a href="#">RD17RD18</a> ]. This will provide a written, drawn and photographic record of this heritage asset. A

Asset	Mitigation
	dilapidation survey will also be undertaken prior to commencement of construction works authorised by the DCO and once works are completed.
Mill house at Felin Cafnan, Cylch-y-Garn (Asset 144)	A historic building survey will be undertaken to a Level 4 standard [RD17RD18]. This will provide a written, drawn and photographic record of this heritage asset. A dilapidation survey will also be undertaken prior to commencement of construction works authorised by the DCO and once works are completed.
Dame Sylvia Crowe's landscaping area (Historic Landscape Type (HLT) 3)	Historic landscape survey to Level 2 standards comprising a basic, accurate, descriptive and interpretive record of a landscape based on the results of field investigation and photographic survey to record the current setting of this heritage asset.
Field Boundaries (Asset 168)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.
Pre-18th Century Field System (Asset 204)	Strip, map and sample would be undertaken in accordance with the <i>standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [RD15RD16] and a WSI agreed with the IACC.
Part of Field System (Asset 218)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.
Neuadd Field System (Asset 239)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.
Field Boundaries (Asset 276)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.
Cafnan Field System IV (Asset 277)	Strip, map and sample would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [RD15RD16] and a WSI agreed with the IACC.
Field Boundaries (Asset 304)	Recording undertaken during trial trenching has mitigated the impact on this asset.
Field Boundary (Asset 306)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.

Asset	Mitigation
Field Boundary (Asset 312)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.
Possible Burnt Mound, north of Ty-croes (Asset 553)	Mitigation works which could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.
St. Patricks Church, Llanbadrig (Asset 26)	Photographic survey will be undertaken to record the current setting and provide a permanent visual record of the current conditions of this heritage asset
Capel Bethlehem, Cemaes (Asset 117)	Photographic survey will be undertaken to assess views across to the location of the Temporary Workers' Accommodation from Capel Bethlehem, Cemaes
Cestyll Garden (HLT 2)	Mitigation for Valley Garden and Kitchen Garden and the essential setting includes: <ul style="list-style-type: none"> <li>• photographic survey of gardens;</li> <li>• Level 2 historic building recording;</li> <li>• photographic survey of settings and inter-visibility between gardens, buildings and associated settings; and</li> <li>• Level 2 topographic and landscape survey.</li> </ul>
Simdda-wen, Garden, Tregele (Asset 139)	Photographic survey will be undertaken provide a permanent visual record of this heritage asset.
The Firs, Garden, Tregele (Asset 195)	Photographic survey will be undertaken to record the current setting and provide a permanent visual record of the current conditions of this heritage asset.
Rhwng y Dau Fynydd, Tregele (Asset 225)	A historic building recording will be undertaken of the remaining outbuilding to a Level 2 standard [RD17RD18]. This will provide a drawn and photographic record of this heritage asset.
Trackway from Tyddyn-Gele (Asset 269)	Archaeological earthwork survey and photographic survey will be undertaken to provide a permanent visual record of its current condition.
Well (Asset 273)	Photographic survey will be undertaken to provide a permanent visual record of the current conditions of this heritage asset.
Boundary Wall, Tai Hirion (Asset 727)	Photographic survey will be undertaken to provide a permanent visual record of the current conditions of this heritage asset.
Field Boundary, Tai Hirion (Asset 730)	Photographic survey will be undertaken provide a permanent visual record of the current conditions of this heritage asset.

Asset	Mitigation
Chain Home Guard Installation (Asset 65)	Photographic survey will be undertaken to provide a permanent visual record of the current conditions of this heritage asset.
Wylfa House, Former Site of, and Wylfa Garden, Remains of, Cemaes Bay (Asset 73)	A historic building recording will be undertaken of the remaining outbuilding to a Level 1 standard [ <a href="#">RD17RD18</a> ].
Receiving Tower, Chain Home Guard, Cemaes Bay (Asset 84)	Photographic survey will be undertaken to record the current setting and provide a permanent visual record of the current conditions of this heritage asset.
Limekiln, Porth-y-pistyll (Asset 106)	Level 3 historic building recording to provide a permanent documentary (written, drawn and photographic) record of historic buildings in their current form and setting.
Simdda-wen (site of) (Wylfa Sports and Social Club) (Asset 147)	A historic building recording will be undertaken of the remaining outbuilding to a Level 1 standard [ <a href="#">RD17RD18</a> ].
Cattle Grid Lodge, Simdda-wen (Asset 170)	Level 3 historic building recording to provide a permanent documentary (written, drawn and photographic) record of historic buildings.
Swn y Mor House and Outbuildings (Asset 194)	Photographic survey will be undertaken to provide a permanent visual record of the current conditions of this heritage asset.
Council Depot, Tregelle (Asset 206)	Photographic survey will be undertaken to provide a permanent visual record of the current conditions of this heritage asset.
Stone Field Barn South of Tregelle (Asset 317)	Level 3 historic building recording to provide a permanent documentary (written, drawn and photographic) record of historic buildings.
Groesfechan (Asset 341)	Photographic survey will be undertaken to record the current setting and provide a permanent visual record of the current conditions of this heritage asset.
Barn, north-east of Neuadd (Asset 823)	Level 3 historic building recording to provide a permanent documentary (written, drawn and photographic) record of this historic building.
Cemlyn Coastal Strip (HLT 9)	A photographic survey and historic landscape survey will be undertaken to Level 2 standards [ <a href="#">RD18RD19</a> ].

Asset	Mitigation
Fieldscape, north-west Mon (HLT10)	A photographic survey and historic landscape survey will be undertaken to Level 2 standards [RD48RD19].
Effects on archaeological and palaeoenvironmental remains	Peats and other deposits at Tre'r Gof SSSI with the potential presence of archaeological and palaeoenvironmental remains will be preserved <i>in situ</i> through the avoidance of works within the SSSI boundary and buffer zones and through the minimisation of any new drainage within this area.
Structures, Chain Home Guard, Cemaes Bay (Asset 76)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.
Aerial Photograph site, Cemaes Bay (Asset 78)	Archaeological excavation would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [RD45RD16] and a WSI agreed with the IACC.
Porth Wylfa Possible Circular Enclosure (Asset 96)	Archaeological excavation would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [RD45RD16] and a WSI agreed with the IACC.
Park Lodge Enclosure (Asset 121)	Archaeological excavation of the heritage asset. Excavation would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [RD45RD16] and a WSI agreed with the IACC.
Park Lodge Enclosure (Asset 127)	Archaeological excavation would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [RD45RD16] and a WSI agreed with the IACC.
Burnt Mounds and Pits (Asset 145)	Strip, map and sample would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [RD45RD16] and a WSI agreed with the IACC.
Cafnan Field System (part of) (Asset 162)	Archaeological excavation would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [RD45RD16] and a WSI agreed with the IACC.
Bristol Beaufigther VI X8194 (Asset 185)	Toolbox talks. Recording and removal of the remains of the asset under licence if discovered.



Asset	Mitigation
Pennant Enclosure (Asset 205)	Archaeological excavation would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <a href="#">RD15RD16</a> ] and a WSI agreed with the IACC.
Rhwng y Dau Fynydd Burnt Mound and Ring Ditch (Asset 207)	Archaeological excavation would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <a href="#">RD15RD16</a> ] and a WSI agreed with the IACC.
Caerdegog Isaf Burnt Mount (Asset 245)	Strip, map and sample would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <a href="#">RD15RD16</a> ] and a WSI agreed with the IACC.
Burnt Mound, Rhwng y Dau Fynydd (Asset 251)	Strip, map and sample would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <a href="#">RD15RD16</a> ] and a WSI agreed with the IACC.
Penrallt Curvilinear Enclosure (Asset 272)	Archaeological excavation would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <a href="#">RD15RD16</a> ] and a WSI agreed with the IACC.
Neuadd Rectilinear Enclosure (Asset 281)	Archaeological excavation would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <a href="#">RD15RD16</a> ] and a WSI agreed with the IACC.
Possible Burnt Mound, Penrallt (Asset 314)	Strip, map and sample would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <a href="#">RD15RD16</a> ] and a WSI agreed with the IACC.
Tyddyn-Goronwy Prehistoric Settlement (Asset 517)	Strip, map and sample would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <a href="#">RD15RD16</a> ] and a WSI agreed with the IACC.
Caerdegog Isaf Ditches and Pit (Asset 523)	Strip, map and sample would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute



Asset	Mitigation
	for Archaeologists [ <a href="#">RD15RD16</a> ] and a WSI agreed with the IACC.
Possible Burnt Mount, South of The Firs (Asset 525)	Archaeological excavation would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <a href="#">RD15RD16</a> ] and a WSI agreed with the IACC.
Palaeoenvironmental Assessment Area 2 (Asset 527)	Palaeoenvironmental assessment followed by palaeoenvironmental analysis, if required.
Tregele Prehistoric Settlement and Burnt Mount 1 (Asset 529)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.
Burnt Spreads and Pits (Asset 535)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.
Three Burnt Mounds, Caerdegeg Isaf (Asset 536)	Strip, map and sample would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <a href="#">RD15RD16</a> ] and a WSI agreed with the IACC.
Ring-ditch and Burnt Mound, Tyddyn-Gele (Asset 537)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.
Burnt Mounds, Rhwng y Dau (Asset 538)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.
Burnt Mound and Field Boundaries, Tre'r Gof Uchaf (Asset 539)	Archaeological excavation would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <a href="#">RD15RD16</a> ] and a WSI agreed with the IACC.
Burnt Mound, Ditches and Pits, East of Tyddyn-Gele (Asset 547)	Archaeological excavation would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <a href="#">RD15RD16</a> ] and a WSI agreed with the IACC.

Asset	Mitigation
Burnt Mound, East of Caerdegog Isaf (Asset 549)	Strip, map and sample would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <a href="#">RD15RD16</a> ] and a WSI agreed with the IACC.
Ring-gully, Rhwng y Dau Fynydd (Asset 550)	Strip, map and sample would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <a href="#">RD15RD16</a> ] and a WSI agreed with the IACC.
Pit, Postholes and Stakeholes, South-east of Tyddyn-Goronwy (Asset 559)	Strip, map and sample would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <a href="#">RD15RD16</a> ] and a WSI agreed with the IACC.
Burnt Mound and Stone Structure, north-east of Tyddyn-Gele (Asset 566)	Strip, map and sample would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <a href="#">RD15RD16</a> ] and a WSI agreed with the IACC.
Roman Settlement, north-west of Treglele (Asset 567)	Archaeological excavation of the heritage asset. Excavation would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <a href="#">RD15RD16</a> ] and a WSI agreed with the IACC.
Possible Stone Platform, north-west of Treglele (Asset 568)	Archaeological excavation would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <a href="#">RD15RD16</a> ] and a WSI agreed with the IACC.
Porth yr Ogof Roman Activity (Asset 573)	Archaeological excavation would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <a href="#">RD15RD16</a> ] and a WSI agreed with the IACC.
Possible Burnt Mound, west of Porth Wylfa (Asset 578)	Archaeological excavation would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <a href="#">RD15RD16</a> ] and a WSI agreed with the IACC.
Pit, West of Porth Wylfa (Asset 579)	Archaeological excavation of the heritage asset. Excavation would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i>

Asset	Mitigation
	from the Chartered Institute for Archaeologists [ <a href="#">RD15</a> <a href="#">RD16</a> ] and a WSI agreed with the IACC.
Porth Wylfa Cist Cemetery (Asset 580)	Archaeological excavation of the heritage asset. Excavation would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <a href="#">RD15</a> <a href="#">RD16</a> ] and a WSI agreed with the IACC.
Porth Wylfa Gully and Postholes (Asset 581)	Archaeological excavation would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <a href="#">RD15</a> <a href="#">RD16</a> ] and a WSI agreed with the IACC.
Ditch and Pits, South of Porth Wylfa (Asset 587)	Archaeological excavation would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <a href="#">RD15</a> <a href="#">RD16</a> ] and a WSI agreed with the IACC.
Prehistoric Pit, north-east of Neuadd (Asset 590)	Recording undertaken during trial trenching has mitigated the impact on this asset.
Nant Orman, Cemaes (Asset 138)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.
Tre'r Gof Uchaf, Cemaes (Asset 163)	Level 3 historic building recording already undertaken.
Ty'n y Maes, Cemaes Bay (Asset 74)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.
Earthworks, Chain Home Guard, Cemaes Bay (Asset 79)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.
Trackway (Asset 86)	Photographic survey would be undertaken in accordance with relevant guidance [ <a href="#">RD15</a> , <a href="#">RD16</a> , <a href="#">RD17</a> , <a href="#">RD18</a> ] and a WSI which would be agreed with the IACC.
Earthworks, Chain Home Guard, Cemaes Bay (Asset 98)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.
Earthworks, Chain Home Guard, Cemaes Bay (Asset 99)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.

Asset	Mitigation
Boathouse, Remains of, Porth-y-pistyll (Asset 100)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.
Earthworks, Chain Home Guard, Cemaes Bay (Asset 107)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.
Cwt, Former Site of, Porth-y-pistyll (Asset 109)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.
Mill Bay Landing Places (Asset 110)	Photographic survey would be undertaken in accordance with relevant guidance [ <a href="#">RD15</a> , RD16, RD17, <a href="#">RD18</a> ] and a WSI which would be agreed with the IACC.
Pen Pistyll, Former Site of, Porth-y-pistyll (Asset 113)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.
Park Lodge, Cemaes (Asset 114)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.
Ty Croes, Cemaes Bay (Asset 119)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.
Road from Tregele to Wylfa (Asset 122)	Photographic survey would be undertaken in accordance with relevant guidance [ <a href="#">RD15</a> , RD16, RD17, <a href="#">RD18</a> ] and a WSI which would be agreed with the IACC.
Earthworks, Chain Home Guard, Cemaes Bay (Asset 126)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.
Tai Hirion, Porth-y-pistyll (Asset 146)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.
The Current Track to Simdda-wen and Tai Hirion (Asset 148)	Archaeological earthwork survey. Level 2 historic landscape survey and photographic survey would be undertaken in accordance with relevant guidance [ <a href="#">RD16</a> , <a href="#">RD19</a> , <a href="#">RD17</a> , <a href="#">RD20</a> ]
Structure, South of Simdda-wen (Asset 149)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.

Asset	Mitigation
Building, South-east of Simdda-wen (Asset 151)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.
Field Boundary (Asset 166)	Strip, map and sample would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <a href="#">RD45RD16</a> ] and a WSI agreed with the IACC.
Cae'r Brenhin, Former Site of, Tregele (Asset 167)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.
Tan yr Allt, Tregele (Asset 169)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.
Road from Tregele to Cafnan (Asset 176)	Level 2 archaeological earthwork survey. The Level 2 archaeological earthwork survey would be undertaken in accordance with relevant guidance [ <a href="#">RD46</a> , <a href="#">RD49RD17</a> , <a href="#">RD20</a> ].
Pennant, Tregele (Asset 177)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.
Bronydd, Tregele (Asset 183)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.
Pen y Groes, Former Site of, Tregele (Asset 189)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.
Chequers and Bryn Fferen, Tregele (Asset 191)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.
Trackway from Tyddyn to the A5025 (Asset 196)	Level 2 archaeological earthwork survey. The Level 2 archaeological earthwork survey would be undertaken in accordance with relevant guidance [ <a href="#">RD46</a> , <a href="#">RD49RD17</a> , <a href="#">RD20</a> ].
The Firs, Tregele (Asset 198)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.
Pen Lon, Tregele (Asset 199)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.

Asset	Mitigation
Mound (Asset 201)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.
Tyddyn Du and Pen y Groes Isaf, Tregele (Asset 210)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.
Trackway to Caerdegog Isaf (Asset 248)	Level 2 archaeological earthwork survey. The Level 2 archaeological earthwork survey would be undertaken in accordance with relevant guidance [ <del>RD16</del> , <del>RD19</del> <a href="#">RD17</a> , <a href="#">RD20</a> ].
Ditch and Natural Features (Asset 254)	Strip, map and sample would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <del>RD15</del> <a href="#">RD16</a> ] and a WSI agreed with the IACC.
Field Boundary (Asset 259)	Strip, map and sample would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <del>RD15</del> <a href="#">RD16</a> ] and a WSI agreed with the IACC.
Trackway to Penrallt (Asset 261)	Level 2 archaeological earthwork survey. The Level 2 archaeological earthwork survey would be undertaken in accordance with relevant guidance [ <del>RD16</del> , <del>RD19</del> <a href="#">RD17</a> , <a href="#">RD20</a> ].
Penrallt Farmhouse (site of) (Asset 265)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.
Possible Structure (Asset 268)	Strip, map and sample would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <del>RD15</del> <a href="#">RD16</a> ] and a WSI agreed with the IACC.
Ty Baner (Asset 271)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.
Field Boundary (Asset 274)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.
Field Boundary (Asset 305)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.



Asset	Mitigation
Pits and Ditches, South of Tregele (Asset 545)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.
Pits and Linear, north of Pen-lôn (Asset 572)	Recording undertaken during trial trenching has mitigated the impact on this asset.
Concentration of Linears and Pits, West of Porth Wylfa (Asset 576)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.
Pit, West of Porth Wylfa (Asset 577)	Archaeological excavation would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <a href="#">RD15</a> <a href="#">RD16</a> ] and a WSI agreed with the IACC.
Palaeochannel, South of Porth Wylfa (Asset 584)	Palaeoenvironmental assessment followed by palaeoenvironmental analysis, if required.
Postholes, north of Neuadd (Asset 592)	Strip, map and sample would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <a href="#">RD15</a> <a href="#">RD16</a> ] and a WSI agreed with the IACC.
Pits, north of Neuadd (Asset 593)	Strip, map and sample would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <a href="#">RD15</a> <a href="#">RD16</a> ] and a WSI agreed with the IACC.
Field Boundary, north-west of The Firs (Asset 726)	Photographic survey would be undertaken in accordance with relevant guidance [ <a href="#">RD15</a> , <a href="#">RD16</a> , <a href="#">RD17</a> , <a href="#">RD18</a> ] and a WSI which would be agreed with the IACC.
Pond, Site of, north-west of Caerdegog Isaf (Asset 728)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.
Field Boundary, east of Cestyll (Asset 731)	Photographic survey would be undertaken in accordance with relevant guidance [ <a href="#">RD15</a> , <a href="#">RD16</a> , <a href="#">RD17</a> , <a href="#">RD18</a> ] and a WSI which would be agreed with the IACC.
Track, Porth yr Ogof (Asset 747)	Photographic survey would be undertaken in accordance with relevant guidance [ <a href="#">RD15</a> , <a href="#">RD16</a> , <a href="#">RD17</a> , <a href="#">RD18</a> ] and a WSI which would be agreed with the IACC.



Asset	Mitigation
Building and Enclosure, north-east of Neuadd (Asset 758)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.
Building/Enclosure north of Neuadd (Asset 770)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.
Transmitter Mast, Chain Home Guard, Cemaes Bay (Asset 52)	Photographic survey would be undertaken in accordance with relevant guidance [ <a href="#">RD15</a> , RD16, RD17, <a href="#">RD18</a> ] and a WSI which would be agreed with the IACC.
Transmitter Mast, Chain Home Guard, Cemaes Bay (Asset 52)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.
Boat House, Cemaes Bay (Asset 57)	Level 2 historic building recording already completed.
Bryn Tirion and Tre'r Gof Isaf (Asset 111)	Level 3 historic building recording and photographic survey has already been undertaken.
Cestyll House, Former Site of, Porth-y-pistyll (Asset 132)	Archaeological earthwork survey of the heritage asset. The Level 2 archaeological earthwork survey would be undertaken in accordance with relevant guidance [ <a href="#">RD16</a> , <a href="#">RD19</a> <a href="#">RD17</a> , <a href="#">RD20</a> ].
Cestyll House, Former Site of, Porth-y-pistyll (Asset 132)	Mitigation works could potentially include a targeted archaeological watching brief, targeted excavation and targeted strip, map and sampling.
Tyddyn-Goronwy, Cemaes (Asset 154)	Level 3 historic building recording has already been undertaken.
Caerdegog Isaf and Outbuilding and Lower Farm and Outbuildings (Asset 286)	Photographic survey to document current setting of the asset. Photographic survey would be undertaken in accordance with relevant guidance [ <a href="#">RD15</a> , RD16, RD17, <a href="#">RD18</a> ] and a WSI which would be agreed with the IACC.
Cestyll Garden (HLT 2)	The Lady's Finger of Lancaster apple tree from Cestyll Garden will be translocated. The exact location will be listed in the Archaeological Mitigation Scheme, which will be produced in consultation with relevant stakeholders.
Trackway (Asset 299)	Level 2 archaeological earthwork survey. The Level 2 archaeological earthwork survey would be undertaken in accordance with relevant guidance [ <a href="#">RD16</a> , <a href="#">RD19</a> <a href="#">RD17</a> , <a href="#">RD20</a> ].

Asset	Mitigation
Linears, Pits and Postholes, West of Porth Wylfa (Asset 575)	Archaeological excavation would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <a href="#">RD15RD16</a> ] and a WSI agreed with the IACC.
Sub-circular Pit, West of Tyddyn-Gele (Asset 565)	Recording undertaken during trial trenching has mitigated the impact on this asset.
Ditches, East of Ty-croes (Asset 558)	Archaeological excavation would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <a href="#">RD15RD16</a> ] and a WSI agreed with the IACC.
Cemaes (HLT 7)	Level 2 Historic Landscape Survey and Photographic Survey. The Level 2 historic landscape survey and photographic survey would be undertaken in accordance with relevant guidance [ <a href="#">RD16</a> , <a href="#">RD19RD17</a> , <a href="#">RD20</a> ].
Wylfa (HLT 8)	Level 2 Historic Landscape Survey and Photographic Survey. The Level 2 historic landscape survey and photographic survey would be undertaken in accordance with relevant guidance [ <a href="#">RD16</a> , <a href="#">RD19RD17</a> , <a href="#">RD20</a> ].
Field Boundaries (Asset 90)	Archaeological excavation would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <a href="#">RD15RD16</a> ] and a WSI agreed with the IACC.
Field Boundaries (Asset 150) a	Archaeological excavation would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <a href="#">RD15RD16</a> ] and a WSI agreed with the IACC.
Field Boundaries (Asset 150) b	Recording undertaken during trial trenching has mitigated the impact on this asset.
Field Drains (Asset 200)	Recording undertaken during trial trenching has mitigated the impact on this asset.
Mynydd Ithel Field System (Asset 293)	Recording undertaken during trial trenching has mitigated the impact on this asset.
Possible Ditch (Asset 296)	Recording undertaken during trial trenching has mitigated the impact on this asset.

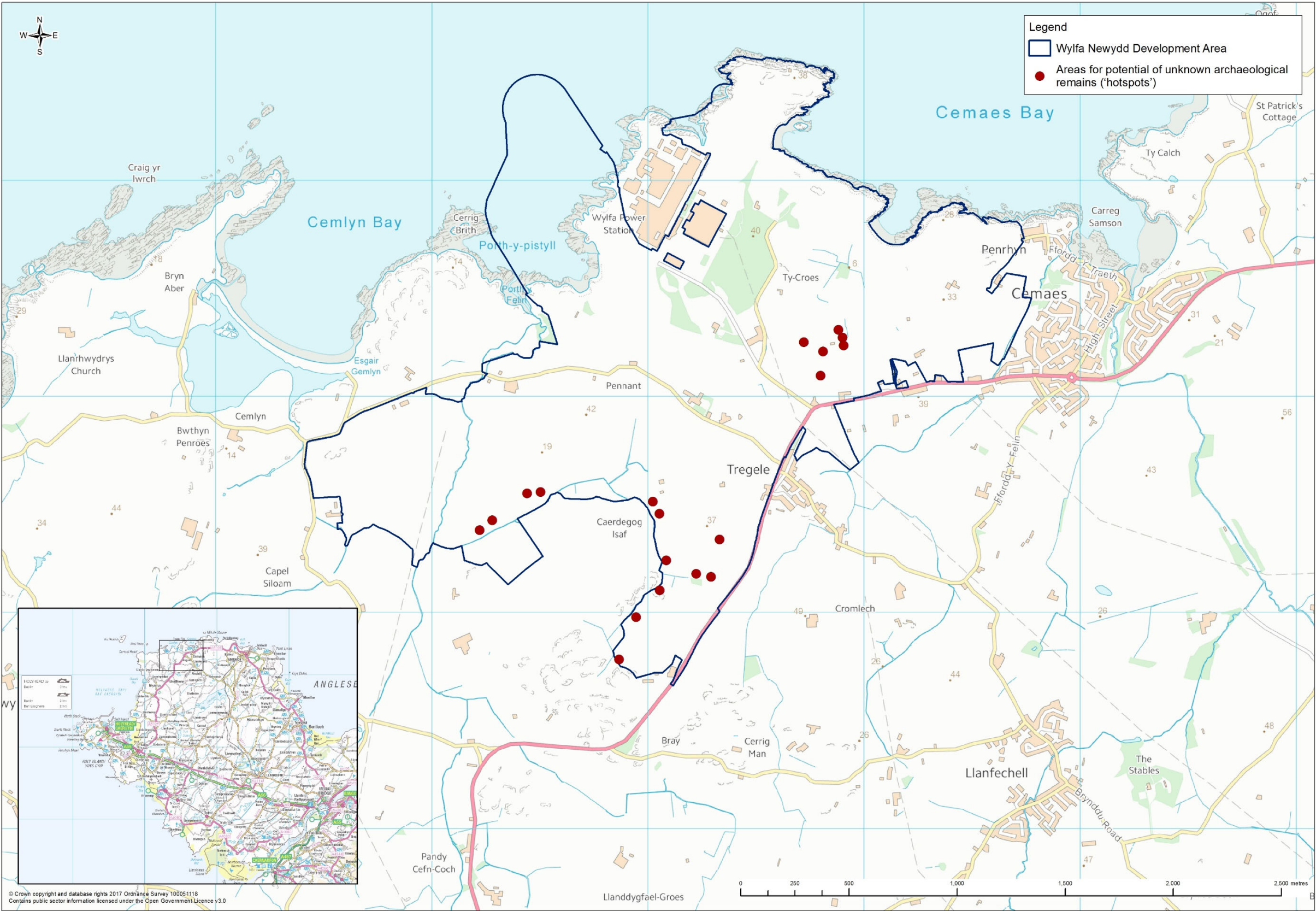
Asset	Mitigation
Quarry (Asset 322)	Strip, map and sample would be undertaken in accordance with the <i>Standard and guidance for archaeological excavation</i> from the Chartered Institute for Archaeologists [ <a href="#">RD15RD16</a> ] and a WSI agreed with the IACC.
Ecological Compensation Sites (All) Effect on HLTs	Photographic survey would be undertaken in accordance with relevant best practice guidance and a WSI which would be agreed with the IACC. Photographic survey would include the preparation and submission of reports to the Historic Environment Record and National Monument Record of Wales and the preparation of an ordered archive which would be submitted to an appropriate repository.
Ecological Compensation Sites (All) Effect on important hedgerows	A Level 2 landscape survey would be undertaken to record the important hedgerows to be removed from each of the three Ecological Conservation Sites. Level 2 historic landscape survey would be undertaken in accordance with <i>Understanding the Archaeology of Landscapes: A Guide to Good Recording Practice</i> [ <a href="#">RD19RD20</a> ].

## 12.2 Areas for potential of unknown archaeological remains (“hotspots”)

- 12.2.1 In addition to the measures identified above, mitigation of impacts on unknown archaeological remains within areas for potential of unknown archaeological remains (‘hotspots’) will also be undertaken as part of the WNDA Archaeological Mitigation Scheme set out in 12.1.4. Identification of these areas are shown in figure 12-1.
- 12.2.2 An example of appropriate mitigation could comprise strip, map and sample (stripping of an area, plotting observed features onto a site plan and then partially excavating those features (sampling)), which will be undertaken in accordance with the *Standard and guidance for archaeological excavation* from the Chartered Institute for Archaeologists [[RD15RD16](#)] and a WSI agreed with the IACC.



Figure 12-1 Areas for potential of unknown archaeological remains



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## **13 Tern compensation strategy**

### **13.1 Introduction**

13.1.1 This Tern Compensation Strategy will only take effect if the Secretary of State determines that the Wylfa Newydd DCO Project risks an Adverse Effect on the Integrity of the Morwenoliaid Ynys Môn/Anglesey Terns Special Protection Area (SPA) and inserts into the Order a DCO requirement that requires the provision of tern compensation sites.

### **13.2 Objective**

13.2.1 The objective of the Tern Compensation Strategy is to deliver two Tern Compensation Sites that provide suitable breeding habitat for Sandwich tern (*Sterna sandvicensis*), common tern (*Sterna hirundo*) and/or Arctic tern (*Sterna paradisaea*).

13.2.2 The strategy aims to address the need to deliver favourable conservation status in line with the conservation objectives of the Morwenoliaid Ynys Mon/Anglesey Terns SPA.

### **13.3 Definitions**

13.3.1 "Tern Compensation Sites" means any of the identified sites at:

- Dulas Bay (figure 13-1);
- Glan y Môr (figure 13-2);
- Morfa Madryn (figure 13-2);
- Abermenai Point (figure 13-3); or
- 'Tern Island' (Inland Sea) (figure 13-4).

13.3.2 Two sites will be provided prior to the start of a full tern breeding period. The works on the WNDA (except for Works No. 3 or 12 in the Order which can progress in advance) cannot commence until they have been provided.

13.3.3 Horizon will aim to establish at least one site, and the second if possible, a full breeding season before works commence on the WNDA (except Works No. 3 or 12 in the Order).

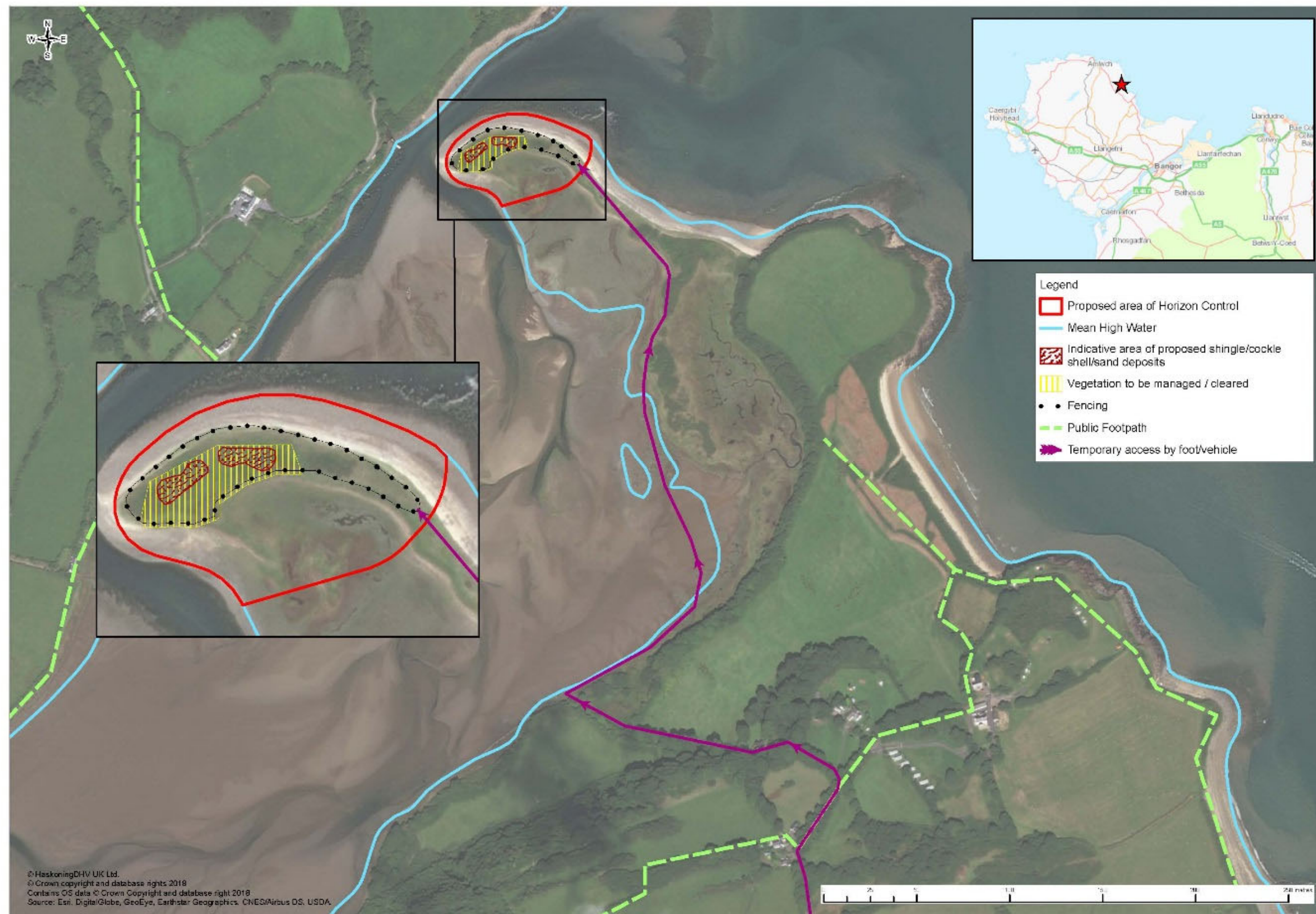
13.3.4 Horizon will use reasonable endeavours to secure all the identified sites listed above until the point that they can no longer be secured on reasonable terms, are no longer suitable as tern compensation sites (to be agreed with NRW and the IACC) or are no longer required (when it is agreed with NRW and the IACC that there is no longer a need for compensation).

13.3.5 "Suitable breeding habitat" is described in section 13.4.

13.3.6 Sites will be provided based on individual establishment and management schemes. "establishment and management scheme" means a scheme prepared in accordance with the principles of this Tern Compensation Strategy and approved by the IACC (in consultation with NRW) under Requirement WN[33] of the Order.



Figure 13-1 Dulus Bay





**Figure 13-2 Glan y Môr and Morfa Madryn**



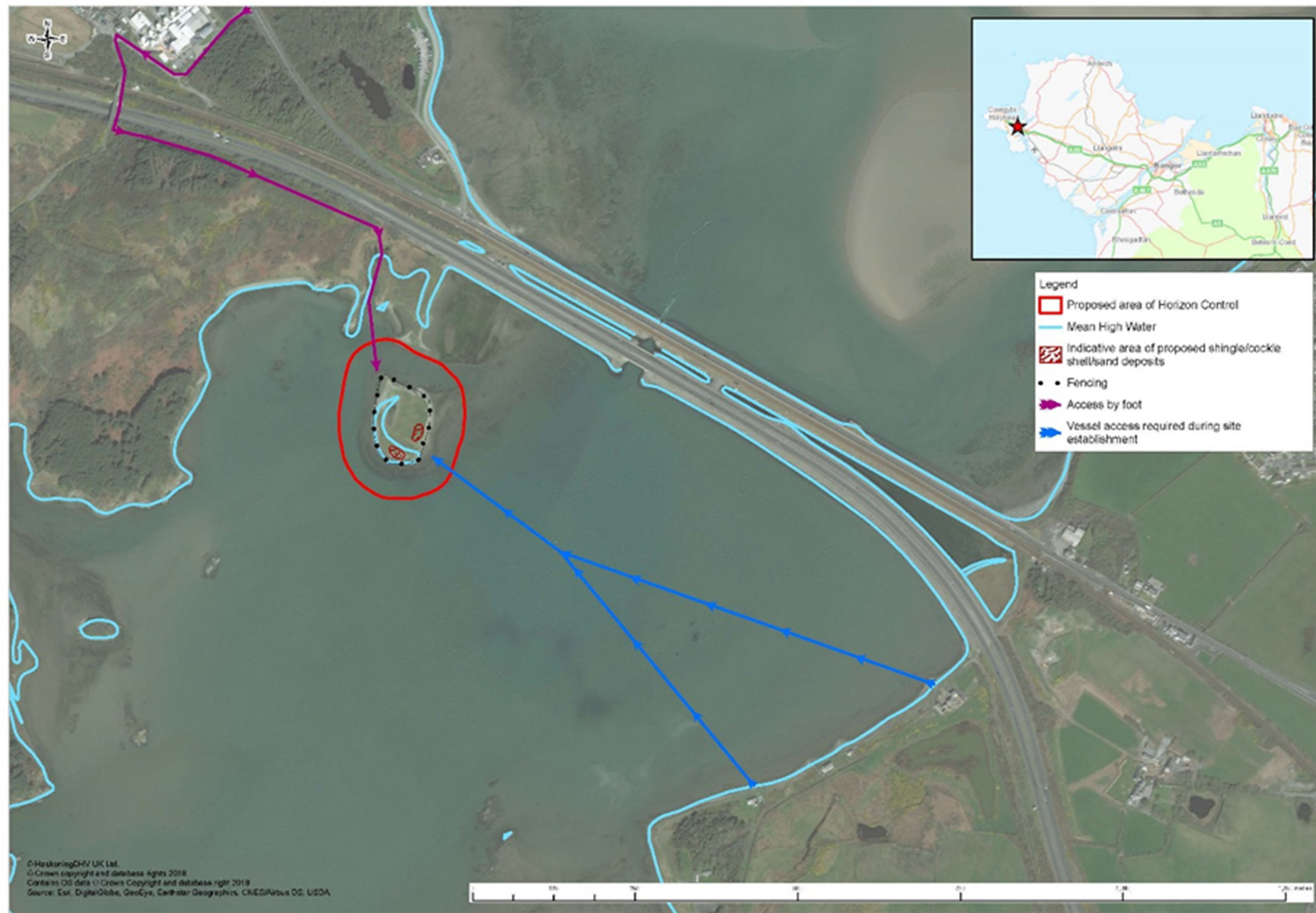


**Figure 13-3 Abermenai Point**





Figure 13-4 Tern Island



## **13.4 Suitable breeding habitat**

- 13.4.1 The Tern Compensation Sites that have been short-listed by Horizon each already contain some suitable habitat for Sandwich, common and Arctic tern nesting and, consequently, in general will require only minor habitat management.
- 13.4.2 This will include, but not be limited to, the deposit of suitable nest-building substrate (sand, shingle and/or cockle shells) at each site and the planting or maintenance of shelter-providing vegetation, such as dune grassland species. In addition, for the Inland Sea site, floating tern nesting rafts will be installed (if this site is taken forward).
- 13.4.3 In addition to habitat provision, chick boxes, tern decoys and tape lures (playback of recordings of terns and Black-headed gulls, where possible using a recording of the Cemlyn colony for 'local dialect') will be used to encourage tern nesting during the tern nest establishment period [see 11.4.2 and 11.4.3].
- 13.4.4 The extent of the area where habitat management will occur at each site will be at least the area of the breeding habitat provided on the islands at Cemlyn Bay (0.46ha) unless otherwise agreed with NRW and the IACC. The land that Horizon proposes to have control over is shown on the figures included for each short-listed site and is at least three times this area at Dulas Bay and more at Glan y Môr and Morfa Madryn; providing room for adaptation. The area over which Horizon can exercise control is limited on Tern Island to the area above Mean High Water Springs and at Abermenai Point (by land ownership). Furthermore, where possible, a "buffer zone" will be established around (or, in the case of spit locations, in advance of) the operational area, within which the wardens will aim to control access and predators.
- 13.4.5 For Dulas Bay (for example) it is proposed that the 0.5ha of habitat creation will be undertaken within the identified 1.4ha of operational land and no active habitat creation works will be undertaken within 10m of the fence. Wardens would manage the habitat within and within 150m of the operational area, and members of the public, dogs and predators would be actively discouraged from this area (the buffer zone).

## **13.5 Site management**

- 13.5.1 The key threat to the success of any created tern nesting habitat will be its accessibility to mammalian predators. Therefore, electric fencing will be positioned around the areas above Mean High Water Springs and wardens will be employed or funded as an important measure in ensuring the availability of nesting habitat through deterring predation and anthropogenic disturbance pressures. This will require welfare facilities (shelters) to be provided. Wardens will also employ all reasonable measures to manage threats from avian predation.
- 13.5.2 Once sites have been established, at an appropriate point in time prior to each establishment period (i.e. late winter), a survey will be undertaken to

assess the need for any management / maintenance (e.g. vegetation control and/or substrate replacement) at each site. Further details will be provided for each site within their own establishment and management Scheme.

13.5.3 The presence of wardens at the sites will be key in the weeks prior to the nest establishment period (e.g. to deter some other species), and will continue to the point at which the terns depart each year (assuming breeding colonies are established).

13.5.4 For the duration of the tern breeding period, a 24-hour full time (seven day-a-week) wardening presence will be in place where breeding terns are present and there is a risk of predation or other limiting factors. Further details of the proposals for wardening will be provided for each site within their own establishment and management Scheme. The number of wardens to be provided overall will be dependent on the number of sites established and their occupation by terns. However, four wardens would be required to be in place for four sites.

13.5.5 At the end of each tern breeding period, chick boxes, electric fencing and the temporary warden shelters will be removed from the sites. However, the vegetation and substrate deposit at the sites will be maintained between the end of each tern breeding period until the next establishment period.

13.5.6 If, after an appropriate period (which will be agreed with NRW) one or more of the sites established have not been occupied, then wardening will not be continued at those sites for the remainder of that tern breeding period.

## **13.6 Site monitoring and adaptive management**

13.6.1 The wardens will monitor and record the site usage by Black-headed gull and terns on an annual basis and report on such usage at the end of the season, sharing such reporting with NRW<sup>2</sup>. The success of the various techniques (i.e. substrate deposit, vegetation cover, chick shelters, electric fencing, decoys and lures) will also be recorded and will be adjusted within the operational land area of the sites when terns are not present, based on any behavioural reactions by the colony.

13.6.2 Different approaches may be tried on different sites, depending on measured success, in an adaptive management regime. The management of the proposed Tern Compensation Sites will be an iterative process and may need to be adapted for different sites over the implementation phase of the compensation.

13.6.3 Within a tern breeding period, if a significant number of terns (to be agreed with NRW) show a preference to nest in an area within the buffer zone controlled by Horizon but not within the operational area of the site,

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<sup>2</sup> This will include monitoring of the Cemlyn Lagoon colony by the site observers proposed to be in place for the tern breeding periods that coincide with the construction phase of the Wylfa Newydd DCO Project. In this way it will be able to be determined if the conservation objectives of the colony are being met at Cemlyn Lagoon.



assuming it is within their power to do so, Horizon will adapt (move) the operational area to suit the terns.

- 13.6.4 Should the area favoured by terns lie within the vicinity of, but out with, the operational land and buffer zone around the sites identified, Horizon will not be required to acquire/have control over this land but should continue to maintain and encourage (by the placement of chick boxes, tern decoys and tape lures) terns to use the Tern Compensation Site.

## **13.7 Site demobilisation**

- 13.7.1 After a period to be agreed with NRW, a review will be undertaken to establish whether management needs to continue at all established sites, based on whether terns are utilising sites. If site management was to cease, and some sites decommissioned (see below), this would need to be approved by the IACC in consultation with NRW.

- 13.7.2 If at the end of construction and Commissioning of Unit 2, terns are not breeding in numbers at the Cemlyn Lagoon colony sufficient to meet the conservation objectives of the Anglesey terns SPA, any of the compensation sites which terns have utilised during the construction phase will be maintained in accordance with their establishment and management Schemes until terns return to breed at the Cemlyn Lagoon colony (in numbers sufficient to meet the conservation objectives of the SPA). However, this obligation will not be required if it can be demonstrated, following agreement with the IACC in consultation with NRW, that the absence of terns from Cemlyn Lagoon is not the result of the Wylfa Newydd DCO Project.

- 13.7.3 If at the end of construction and Commissioning of Unit 2 terns are breeding at the Cemlyn Lagoon colony in numbers sufficient to meet the conservation objectives of the SPA and one or more of the compensation sites have been utilised by breeding terns, Horizon will engage with NRW regarding the transition of responsibility for and management of the site(s) to NRW or a third party ahead of decommissioning the Tern Compensation Sites.

- 13.7.4 If NRW or a third party do not wish to take responsibility for the sites, they will be decommissioned. If one or more of the Tern Compensation Sites are decommissioned, any fencing, tern rafts and welfare facilities will be removed from the sites, with only the shingle and cockle shell deposits to remain on the site. The decommissioning works will only occur outside of the establishment and tern breeding period.

- 13.7.5 If terns abandon the Cemlyn Lagoon colony during the construction of the Power Station in sufficient numbers to mean that the conservation objectives of the SPA are not being met, this is linked to the Wylfa Newydd DCO Project, and none of the Tern Compensation Sites established are being utilised by breeding terns, a review of the compensation package would need to be undertaken (by Horizon, the IACC and NRW) and an appropriate way forward agreed.

## **13.8 Establishment and management schemes**

13.8.1 Prior to commencing works on the Tern Compensation Sites, Horizon will prepare and submit for approval an establishment and management Scheme for each of the sites in accordance with the Requirement WN[33] in Schedule 3 of the Order. The establishment and management schemes will be prepared in accordance with the principles of this Tern Compensation Strategy. Subject to para 13.7 above, the approved establishment and management Schemes (or any approved variations) will be implemented for the duration of the construction period unless otherwise approved by IACC (in consultation with NRW).

13.8.2 The establishment and management schemes will draw on best practice guidance and the advice of tern and management specialists as appropriate. These will be submitted to the IACC and approved by the IACC (in consultation with NRW) prior to the commencement of works to establish the sites.

13.8.3 The establishment and management schemes will set out:

- Site objectives (in accordance with the above objective).
- Detail of the works required on the site, to include vegetation management, shingle deposit and fencing installation.
- Material specifications and quantities.
- A schedule of plant and working methods and the specification of suitable access route(s).
- Methodologies for encouraging tern and Black-headed Gull colonisation.
- Predator control and wardening plans.
- Monitoring, reporting and adaptive management plans for each site.

13.8.4 The Environment Engagement Group will be consulted on the proposed establishment and management schemes.

13.8.5 Horizon will engage with and report to the Environment Engagement Group (at least annually or more frequently in agreement with the Environment Engagement Group) throughout the period in which the Tern Compensation Sites are being operated by them.



## 1314 References

~~Table 13-1~~ **Table 14-1** Schedule of references

ID	Reference
RD1	Department for Environment, Food and Rural Affairs. 2012. <i>Process Guidance Note 3/16(12): Statutory guidance for mobile crushing and screening</i> . London: Department for Environment, Food and Rural Affairs.
RD2	Department for Environment, Food and Rural Affairs. 2012. <i>Process Guidance Note 3/01(12): Statutory guidance for blending, packing, loading, unloading and use of cement</i> . London: Department for Environment, Food and Rural Affairs.
RD3	Department for Environment, Food and Rural Affairs and the Devolved Administrations. 2016. <i>Local Air Quality Management, Technical Guidance (TG16)</i> . London: Department for Environment, Food and Rural Affairs.
RD4	British Standards Institution. 2008. BS 6472-2 <i>Guide to Evaluation of human exposure to vibration in buildings. Blast-induced vibration</i> . London: British Standards Institution.
RD5	British Standards Institution. 2008. BS 5228-2:2009+A1:2014 <i>Code of practice for noise and vibration control on construction and open sites. Vibration</i> . London: British Standards Institution.
RD6	British Standards Institution. 1997. BS 7580-1:1997 <i>Specification for the verification of sound level meters. Comprehensive procedure</i> . London: British Standards Institution.
RD7	British Standards Institution. 2006. BS EN 61672-3:2006 <i>Electroacoustics. Sound level meters. Periodic tests</i> . London: British Standards Institution.
RD8	International Electrotechnical Commission. 1985. IEC 60804:1985. <i>Specification for integrating-averaging sound level meters</i> .
RD9	International Electrotechnical Commission. 2003. IE 61672-1:2003. <i>Electroacoustics – Sound level meters – Part 1: Specifications</i> .
RD10	DIN. 2012. DIN 45669-1 <i>Measurement of vibration immissions – Part 1: Vibration meters – Requirements and tests</i> .
RD11	Contaminated Land: Applications in Real Environments (CL:AIRE). 2011. <i>The Definition of Waste: Development Industry Code of Practice</i> . Version 2. London: CL:AIRE.
RD12	<del>Herpetofauna Groups of Britain and Ireland. 1998. <i>Evaluating Local Mitigation/Translocation Programmes: Maintaining Best Practice and Lawful Standards</i>. HGI Advisory Notes For Amphibian and Reptile Groups (ARGs). HGBI, c/o Froglife, Halesworth. Unpubl.</del> <a href="#">British Standards Institution. 2015. BS 3882:2015 Specification for topsoil</a> . London: British Standards Institution.

ID	Reference
RD13	<a href="#">British Standards Institution. 2012. BS 5837:2012 <i>Trees in relation to design, demolition and construction. Recommendations</i>. London: British Standards Institution.</a> <a href="#">Herpetofauna Groups of Britain and Ireland. 1998. <i>Evaluating Local Mitigation/Translocation Programmes: Maintaining Best Practice and Lawful Standards</i>. HGI Advisory Notes For Amphibian and Reptile Groups (ARGs). HGBI, c/o Froglife, Halesworth. Unpubl.</a>
RD14	<a href="#">Oldham, R.S., Keeble, J., Swan, M.J.S., &amp; Jeffcote, M. (2000). Evaluating the suitability of habitat for the great crested newt <i>Triturus cristatus</i>. <i>Herpetological Journal</i> 10(4): 143–155.</a> <a href="#">British Standards Institution. 2012. BS 5837:2012 <i>Trees in relation to design, demolition and construction. Recommendations</i>. London: British Standards Institution.</a>
<del>RD14</del> <a href="#">RD15</a>	<a href="#">Oldham, R.S., Keeble, J., Swan, M.J.S., &amp; Jeffcote, M. (2000). Evaluating the suitability of habitat for the great crested newt <i>Triturus cristatus</i>. <i>Herpetological Journal</i> 10(4): 143–155.</a>
<del>RD15</del> <a href="#">RD16</a>	Chartered Institute for Archaeologists. 2014. <i>Standard and guidance for archaeological excavation</i> . [Online]. [Accessed: January 2018]. Available from: <a href="http://www.archaeologists.net/sites/default/files/CIfAS&amp;GExcavation_1.pdf">http://www.archaeologists.net/sites/default/files/CIfAS&amp;GExcavation_1.pdf</a>
<del>RD16</del> <a href="#">RD17</a>	Gwynedd Archaeological Planning Service (GAPS). 2015. <i>Guidance for applicants undertaking general photographic surveys for planning purposes</i> . [Online]. [Accessed: 15 January 2017]. Available from: <a href="https://content.historicengland.org.uk/images-books/publications/understanding-archaeology-of-landscapes/heag142-understanding-archaeology-of-landscapes.pdf">https://content.historicengland.org.uk/images-books/publications/understanding-archaeology-of-landscapes/heag142-understanding-archaeology-of-landscapes.pdf</a>
<del>RD17</del> <a href="#">RD18</a>	Historic England. 2016. <i>Understanding Historic Buildings: A Guide to Good Recording Practice</i> . [Online]. [Accessed: January 2018]. Available from: <a href="https://historicengland.org.uk/images-books/publications/understanding-historic-buildings/">https://historicengland.org.uk/images-books/publications/understanding-historic-buildings/</a>
<del>RD18</del> <a href="#">RD19</a>	English Heritage. 2007. <i>Understanding the Archaeology of Landscapes: A guide to good recording practice</i> . London: English Heritage. [Online]. [Accessed: 1 February 2018]. Available from: <a href="https://www.historicengland.org.uk/images-books/publications/understanding-archaeology-of-landscapes/">https://www.historicengland.org.uk/images-books/publications/understanding-archaeology-of-landscapes/</a>
<del>RD19</del> <a href="#">RD20</a>	Historic England. 2017. <i>Understanding the Archaeology of Landscapes: A guide to good recording practice</i> . London: English Heritage. [Online]. [Accessed: 9 May 2017]. Available from: <a href="https://content.historicengland.org.uk/images-books/publications/understanding-archaeology-of-landscapes/understandingthearchaeologyoflandscapes.pdf">https://content.historicengland.org.uk/images-books/publications/understanding-archaeology-of-landscapes/understandingthearchaeologyoflandscapes.pdf</a>