

Response of the environmental NGOs (eNGOs) to the Secretary of State letter (24 January 2020)

Wylfa Newydd Nuclear Power Station Development Consent Order (EN010007)

North Wales Wildlife Trust - 20011639

National Trust - 20010995

Royal Society for Protection of Birds – 20011586

Further to the publication on the Planning Inspectorate website (24 January 2020) of responses to the Secretary of State's request for further information, the eNGOs have considered the relevant responses, principally those of: -

- Horizon Nuclear Power
- Natural Resources Wales
- Isle of Anglesey County Council
- Welsh Government

Natural Resources Wales (NRW) response 20 December 2019

We note the content of NRW's letter to the Secretary of State (20 December 2019). The eNGOs support the response from NRW and we note with disappointment that NRW has had little engagement from the Applicant (Horizon) since the close of Examination. NRW specifically notes there has been no further information from the Applicant in relation to items raised by the Secretary of State in paragraphs 6 (IROPI, alternative solutions and compensation), paragraph 8 (noise), paragraph 9 (visual disturbance) and paragraph 10 (recreational disturbance). It would appear that the only safe conclusion is that NRW's position remains unchanged from that at the close of the Examination. The eNGOs' submission to the Secretary of State reflects the same level of concern and lack of resolution of outstanding issues.

Secretary of State letter dated 24 January 2020

In the letter of 24 January the Secretary of State indicates that Horizon is still to update her on a number of outstanding issues. In addition, it is clear that other items such as the archaeological works and agreements on how to progress this have yet to be finalised (cf response from Welsh Government and IACC).

It is not clear whether any of these outstanding matters will result in changes to the scope, scale or timing of elements of the DCO project's implementation, which may have additional environmental consequences. Where such additional information is supplied it is recommended that it should be subject to sufficient transparent scrutiny to ensure that it does not alter the conclusions of either the HRA (Habitats Regulations Assessment) or EIA in terms of likely impacts and to determine if the current mitigation and compensation needs further adjustments.

The risk from such unresolved matters can be illustrated by the concerns that have been raised by National Trust and North Wales Wildlife Trust in relation to Mound E (tern visual disturbance and landscape impacts, Secretary of State Paragraph 9). Any adjustments to either how the Site Preparation and Clearance (SPC) works are undertaken or the creation and reworking of the landform as a result of any necessary agreements about the archaeological investigations could have further detrimental effects on the Anglesey Terns Special Protection Area (SPA) and the AONB.

The eNGOs have invested significant resources in the Examination and discussions with Horizon prior to the formal NSIP process. It had not been anticipated that our input would be required on an ongoing basis, however all three organisations remain committed to full engagement with all parties, including the Applicant, to ensure that the outcomes for biodiversity and ecosystem services are of the highest standard and proportionate to the significant importance of the wildlife features that will be affected by the proposals.

