



# Ymddiriedolaeth Genedlaethol National Trust

**WYLFA NEWYDD, PRE APPLICATION 3, JUNE 2017**

## **RESPONSE FROM NATIONAL TRUST**

### **1. National Trust and North Anglesey**

1.1 National Trust is a leading conservation charity with 4 million members. Established over 115 years ago, our primary statutory purpose is to promote the preservation of special places for the benefit of the nation. To achieve this aim we manage over a quarter of a million hectares of land, more than 700 miles of unspoilt coastline and estuary, several hundred historic houses, gardens and parks, and 6 World Heritage Sites. More than 100 million visits are made every year to the properties in our care.

1.2 National Trust owns 482ha of land in North Anglesey, including land adjoining the proposed Wylfa Newydd power station project at Porth y Pistyll; farms and agricultural land next to the proposed development area and a property and land adjoining the site of proposed land raising. National Trust has land ownership at the nearby Cemlyn lagoon, an internationally designated protected area and one of the most important sites in the UK for breeding sandwich terns.

1.3 Cemlyn is a place of dramatic big skies; a place of tranquillity and fragility; a sanctuary for wildlife and for those escaping everyday life to seek peace and solace amongst breath taking beauty. The area is steeped in maritime history, the first lifeboat on Anglesey, the base for the first flight across the Irish Sea and the site of a number of coastal historic farm and mill buildings.

1.4 At Cemlyn Bay, a shingle storm beach forms a bar between a tidal lagoon and the open shore. The shingle habitats, together with saltmarsh developing around the lagoon and brackish pools further inland are a combined rare and fragile habitat.

1.5 National Trust ownership in North Anglesey also includes a number of listed buildings and sites of heritage and cultural interest. Adjoining the development area is Felin Gafnan a Grade II listed building, a Grade II corn drying mill and lying next to the development a Grade II\* listed mill.

1.6 This land was acquired for its outstanding seascape quality; a place where land and sea combine to produce a stunning end product; recognised by human, bird and cetacean visitors; acknowledged and appreciated by its resident population including National Trust tenants and staff. The Cemlyn area provides an experience which is valued and loved by all who visit.

1.7 National Trust has developed a future vision for the area; a vision which respects the natural and cultural environment, and a vision which fulfils our role of looking after this special place, forever, for everyone. The Cemlyn Vision was shared with our tenants, Members and visitors during summer 2016. We held an open day and shared our vision at the Anglesey Show and Cemlyn Open Day. We have received a large number of positive comments and work has progressed during 2017 on moving forward the Cemlyn Vision.

1.8 It is noted Pre application 3 (PAC3) proposes a continued timeline of 16 years of construction, 60 years of operation and a further 140 years of waste placement. National Trust owns the land at North Anglesey in perpetuity, and will retain its responsibilities in the area long after the restoration of the existing Wylfa site and long after Wylfa Newydd has been built, operated and decommissioned.

1.9 National Trust has a wide portfolio of natural and heritage assets in North Anglesey. Many lie within the identified zone of visual influence, and heritage search area for the proposed Wylfa Newydd.

1.10 The next decade will be challenging for the environment of North Anglesey. It is hoped that all organisations making decisions in the area will share a future vision that respects the natural and cultural environment. It is also hoped that sufficient investment is made to protect what this area has given to past generations and ensure we are still able to pass onto future generations the inherent qualities of this very special place. Fundamental questions on this future still remain prior to Development Consent Order (DCO).

1.11 Many of the issues raised by National Trust over three years of consultation remain unresolved. **All of our major issues raised in Pre application 2 remain unresolved.** Our summary and PAC2 issues is provided as Appendix 2.

1.12 It is thus with surprise and disappointment, that at this late stage, Horizon have chosen not to resolve key environmental considerations of the scheme. The scheme will bring forward construction on a scale not seen in Wales since the Victorian era. The scheme presented at PAC3 lacks any environmental sensitivity, clarity or certainty. Much of the displaced spoil will either end up being dumped in the sea or on new areas of land adjoining internationally designated land. The impacts on the marine environment and on a sensitive ecology are still being thought through. PAC3 confirms that key modelling is still being undertaken on fundamental environmental features including breeding terns, other birds and marine mammals, construction drainage runoff and on landscaping.

1.13 It is hoped that Horizon will make a gear change in how they view the beauty and quality of the natural environment in North Anglesey, and give this equal consideration to the widely promoted and examined potential benefits of jobs and investment.

## **2. Pre Application 3, June 2017**

2.1 National Trust welcomes the opportunity to comment on PAC3, but expected many issues to be clarified prior to submission of DCO. Unfortunately, PAC3 fundamentally underwhelms our expectations providing no clarity on many significant issues raised during PAC1 and 2.

2.2 Our detailed comments on PAC3 are provided in Appendix 1.

2.3 National Trust wishes to draw attention to key issues for PAC3.

-In our response to PAC 3 we have drawn attention to lack of information provided during pre-application consultation and lack of environmental information which, unless remedied may result in a flawed application for DCO consent.

-Lack of progress or availability of a marine hydrodynamic model and thus no ability to confirm understanding of the potential impact of the scheme on the marine environment and National Trust land at Cemlyn. PAC3 does not demonstrate understanding of change to waves, current and tidal flow, suspended sediment plumes and accretion and erosion rates. PAC3 does not bring forward the required information to demonstrate full understanding of the marine environment (model set up details, a data report and a modelling scenario);

-PAC3 confirms the construction of a temporary causeway linking the western breakwater to the shore and confirming the use cofferdams and a semi-dry approach to assist dredging. This is still recognised as a Major Adverse environmental impact, and adjoins NT land with no recognition of mitigation or compensation;

-Lack of progress relating to ornithological impacts at Cemlyn and Holyhead deep during construction;

-Lack of progress or publically available information on Habitat Regulations Assessment (HRA) issues;

-Lack of progress or any detail relating to the Landscape and Environmental Masterplan (LEMP). It is noted that the locations of the soil storage mounds and the design of drainage systems/sediment traps will be critically important in preventing and minimising losses of fine sediment and nutrients in surface runoff to adjoining coastal waters and land areas. The information provided on the LEMP is indicative and very general;

-The new Campus proposal at Wylfa will bring forward 4000 on site construction workers plus a further 3000 housed locally. This brings forward new impacts to the local area including landscape and visual impacts from National Trust owned land at Llanbadrig and inevitable physical and recreational pressure on the local landscape,

noise/visual disturbance to the tern colony at Cemlyn and the need to absorb surface and foul water drainage from the new campus.

-The scheme as emerging from pre application contains neither specific commitment nor adequate consideration of tourism impacts in North Anglesey. The scheme does not demonstrate any consideration of negative impacts to tourism based around the proximity of land in National Trust ownership. There has also been no proactive engagement in what could be significant construction tourism on sensitive land bordering the construction site. The length of construction is now confirmed as 16 years, a considerable period of time for visitors and tenants.

- National Trust considers that the process taken forward during Pre application is neither thorough nor effective, and given the ongoing modelling and environmental assessment work, there has been no opportunity to understand the implications, nor any possibility of reaching any agreements. National Trust is thus surprised and disappointed that Horizon continues with the stated timescale of DCO submission in the absence of any detail modelling and environmental assessment which is stated as ongoing. Given the importance of the issue to the future integrity of SPA and SAC, National Trust invites the Secretary of State to specify a further period of detailed pre application to enable third parties to understand exactly what is proposed and the implications.

## **APPENDIX 1, NATIONAL TRUST COMMENTS IN RELATION TO PRE APPLICATION 3, JUNE 2017**

A1.1 Section 1.4 identifies flexibility within the DCO submission. National Trust expressed previous concern during Pre application 1 and 2 about Horizon seeking flexibility in moving forward the project. **The lack of progress on many environmental aspects increases our concern in relation to the strategic approach to flexibility** and in particular the stated intention (1.4.7) for flexibility for the MOLF and breakwaters. We are also concerned about the stated intention (Section 1.4.9) for landscape and drainage works and would not support the proposed masterplan approach, given the scale, context and setting of the scheme.

A1.2 **The level of detail is not sufficient for adequate consideration and concern is raised about the approach taken to the Rochdale Envelope** given the importance of the receiving environment.

A1.3 Section 1.4.11 also advocates the use of flexibility of construction equipment. Much of this equipment will be on site for up to 10 years. **The level of information does not enable the reader to fully understand the proposed scheme.** This conflicts with Horizon's stated intention of understanding that communities and stakeholders will want to have some confidence that they understand the proposal and what may ultimately be granted development consent.

A2.1 At Section 1.5. National Trust note (1.5.2) that detailed modelling and ongoing environmental assessment is progressing, and that final assessments will be reported in full in the Environmental Statement. The PINS Document (Planning Act 2008, Guidance on pre application process ISBN: 978-1-4098-4589-8) notes (Section 15) that "Effective pre-application consultation will lead to applications which are better developed and better understood by the public, and in which the important issues have been articulated and considered as far as possible in advance of submission of the application to the Secretary of State. This in turn will allow for shorter and more efficient examinations". Further (Section 19) the document states "A thorough process can give the Secretary of State confidence that issues that will arise during the six months examination period have been identified, considered, and – as far as possible – that applicants have sought to reach agreement on those issues. Without adequate consultation, the subsequent application will not be accepted when it is submitted. If the Secretary of State determines that the consultation is inadequate, he or she can recommend that the applicant carries out further consultation activity before the application can be accepted. **National Trust invites the Secretary of State to specify a further period of detailed pre application to enable third parties to understand exactly what is proposed and the implications.**

A2.2 **National Trust considers that the process taken forward is neither thorough nor effective,** and given the ongoing modelling and environmental

assessment work, there has been no opportunity to understand the implications, nor any possibility of reaching any agreements. National Trust is thus surprised and disappointed that Horizon continues with the timescale of DCO submission in the absence of any detail modelling and environmental assessment which it states is ongoing.

A3 National Trust would note that Horizon have made use of the NT funded Pye & Blott (2010) report on the geomorphology and coastal processes relating to Cemlyn Lagoon. It would appear no reference is made to the Pye & Blott (2016) update of this report. This report has been made available by National Trust to Horizon during June 2017.

A4. Table 2.1 confirms the construction period as starting at 2018 (Site preparation and clearance works) and ending in 2034 (Intermediate level waste store). Tourist visitors and the National Trust property Felin Gafnan will thus experience construction for a period of 16 years, and thus associated noise and amenity disturbance for that period of time.

A5. National Trust supports the reduced scope of works for SP&C (Section 2.3.7) and awaits greater detail on what is included in the reduced works, mitigation and enhancement.

A6. Section 2.3.14 identifies the use of 40 cranes and 3 very heavy lift cranes with a height of 250m, in use between 2020 and 2027. Given the length of construction, size and height of construction, and setting within and adjoining an AONB, **greater detail needs to be provided on the landscape and visual aspects of construction including cranes and concrete batching plant so we can fully understand the potential impacts.**

A7. Section 2.6 identifies a number of changes to the proposed MOLF and breakwaters and confirms 55 marine vessel movements per month and a revised Western breakwater of 500m and a new location 20m to the west. PAC3 confirms construction will be undertaken in a semi dry environment behind the cofferdam. There remains very little detail on which to comment, as previously. No attempt is made to discuss detail with no reference to materials, colour, visual and ecological mitigation or enhancement. Cofferdam construction with piles will have a profound amenity impact in the area and remains grossly understated. Table 2.10 acknowledges that an increase in vessel movements during construction and operation is “not anticipated” to increase noise effects, but that is awaiting modelling work that is being undertaken, again emphasising the lack of ability to comment on information in sufficient detail.

A8. Section 2.7 confirms the inland route for the Wales Coastal Path, through what will be an industrialised and man-made landscape. The consultation document makes continued use of the terminology “new drumlin landform”. PAC3 brings forward insufficient information within either Section 2.7 or further commentary

relating to the LEMP that the new landform will be a very artificial, land raised area, similar to a landfill restoration rather than the creatively titled “new drumlin landform”. There has been no engagement in any detail relating to LEMP, nor any demonstration that further areas at distance from the AONB have been sought to dispose of spoil. The concept sketch at Figure 2-7 remains meaningless due to any lack of detail so we can understand the potential impacts. It is hoped that a copy of the draft LEMP will be shared prior to DCO submission.

A9. Section 2.8 brings forward a summary of Preliminary Environmental Information. PAC3 does not bring forward any new information relating to PEI, and thus key issues remain outstanding.

A10. Section 2.9 provides a summary of the Proposed Mitigation and LEMP. The documentation indicates the LEMP is a critical component of mitigating the project during both construction and operation. Pages 45-56 indicate the LEMP sequence. Given the criticality of this aspect and the impending DCO, greater detail should be expected. **The information is largely superficial and indicative and does not provide a clear indication of how and what is proposed.** It is assumed that considerably greater detail is available but Horizon has chosen not to seek any views or facilitate informed comment at this stage. National Trust has not been invited to any LEMP meetings in the past two years, leading us to question the level of external engagement or input to detail of the LEMP.

A11. Figure 2-11 confirms the temporary causeway adjoining land owned by National Trust, and associated 9 sentence commentaries within Section 2.9.6. The environmental impacts of bringing forward, and then removing a temporary causeway, still remain unaddressed, and no further forward within PAC3. **It is noted Major Adverse impacts are expected, there is no opportunity to comment on possible mitigation at this stage.**

A12.1 Section 5 brings forward a new approach to accommodation for construction workers. Details are provided within Section 5.5 on a new and expanded Site Campus for up to 4,000 bed spaces across 15 hectares of open space to the north east of the power station site. It is anticipated that the campus construction would commence in 2020 and be operational between 2021 and 2027 with peak occupation during 2023 and 2024. The scheme would constitute 800 car park spaces and 7 storey buildings. PAC3 includes an illustrative view of the proposed campus from near to Llanbadrig point which demonstrates the significant landscape and visual impacts that will be brought forward by this aspect. **Landscape and visual impacts, including night time visual impacts will be considerably greater than previously proposed.**

A12.2 Land owned by National Trust at Llanbadraig needs to be considered in detail and acknowledged. **The footprint of the industrialised landscape will increase with potential implications on walkers using the Wales Coast Path.**

A12.3. **There is very limited information on the consequences of the drainage from the site campus** (Section 5.7.9-10), this approach is surprising given the international significance of the receiving environment.

A13. Table 6-2 confirms the transportation of construction and waste materials. 4.2 million tonnes of bulk construction material will be required (80% delivered via the MOLF). **This will bring forward as yet undefined impacts on residential amenity for National Trust tenant property.**

A14. PAC3 brings forward details relating to a 1900 spaces park and ride proposal at Dalar Hir, north of the A55 (Section 6.6). Details are also provided on logistics centre at Pac Cybi on the A5025, near to Holyhead. Details are provided on 8 highway improvements on the A5025 between Valley and the Power Station. National Trust does not wish to comment on any detail relating to the park and ride, logistics centre, nor highways improvements; all being distant to land owned or tenanted by National Trust.

A15. Section 7 sets out the approach to identifying and securing mitigation for the project and indicates that it provides an update following feedback from PAC2. It is noted within Section 7.3.4 which identifies potential mitigation relating to “the creation of habitat to replace that lost during construction of the Project”; and “where it is not possible to avoid or reduce a significant effect through mitigation, it may be possible to develop some form of compensation, whereby the effect would be offset through measures put in place at other locations”. National Trust support the principle of this issue, but note that at this stage the commitment is not supported by any specific detail, or timings, or confirmation as to whether this principle applies to identified significant marine effects.

A16. It is noted within Table 7-2 that an Ecology Management Plan will be prepared, no further information or discussion is provided in PAC3 other than the statement “Horizon will implement an ecological management plan to mitigate and enhance biodiversity interests on Anglesey”. National Trust would note the current questions raised in the Ecological Options paper (jointly prepared by NT/NWWT/RSPB) which raises wider spatial ecological issues. We would also note that a proposed Ecology Management Plan will bring forward issues for the LEMP which remain unresolved.

A17. It is noted that Table 7-3 states “Horizon will support a Tourism Fund”, and indicates “the fund will assist tourism initiatives to respond to and mitigation against any adverse changes arising from the construction and operation of Wylfa Newydd”. **As with many of the other issues in PAC3, there is a lack of any clarity or certainty in tourism issues.**

A18. Section 8 provides information on community benefits, and has no mention or discussion of ecological issues. It is considered there is potential for ecological mitigation to be brought forward including local tourism and ecological benefits potentially brought forward through the Cemlyn Vision. The final vision has been



shared with Horizon. National Trust shared this as part of the engagement in a draft vision. No one from Horizon attended the Cemlyn Open Day to discuss any potential neighbour land management issues.

A19. In terms of voluntary community benefits, PAC3 states “Horizon intends to further develop a voluntary community benefits scheme once the DCO for the Wylfa Newydd Project has been implemented, currently anticipated to be in 2019, and will further consult with IACC, other stakeholders, and communities at that time”. This lack of specificity is common with many elements of PAC3. It would have been useful to have had more detail to understand what is proposed.

A20. Chapter 9 of the consultation identifies a number of ongoing assessments, including the Habitat Regulations Assessment (HRA). Section 9.4 of PAC3 discusses the update position with regards to the HRA indicating there is ongoing work relating to breeding terns, other birds and marine mammals, construction drainage runoff, landscaping. These aspects remain fundamental to the acceptability of any proposal, and with ongoing studies no comments are possible. **The fundamental issues raised by National Trust remain unresolved.** This is also a surprise given the location of the project, adjoining internationally designated land and within an Area of Outstanding Natural Beauty. Appendix A.6.13 provides a summary of LEMP issues. There is currently, and has never been any detailed information relating to the design of the LEMP, any engagement in this issue by National Trust has been superficial, and the level of detail provided (eg planting, contours, management) has been very limited.

## **APPENDIX 2. NATIONAL TRUST SUMMARY OF THE RESPONSE TO PRE APPLICATION 2, WYLFA NEWYDD. AUGUST 2016.**

2.2 National Trust continues to be deeply concerned about the progress being made on matters of detail at Wylfa Newydd, **and lack of clarification of more fundamental aspects of the scheme relating to protected areas on the North Anglesey coast.** There are many areas of the project that are insufficiently developed at this stage and these remain fundamental problems for National Trust.

2.3 National Trust is disappointed about the lack of progress on key elements of the scheme and the impact on the natural and built environment. National Trust considers that PAC2 is premature, given the outstanding nature of information, and the accepted need to complete further survey work.

2.4 PAC2 demonstrates a lack of investment in modelling and monitoring of the coastal and lagoon environment at Cemlyn, with inadequate baseline surveys and thus a subsequent inability to predict physical impacts on the local environment.

2.5 The **key aspects** of concern for National Trust relate to:

- surface water drainage and the generation of sediment plumes during construction;
- short and long term change to coastal processes;
- insufficient progress to give confidence that the required environmental mitigation will be delivered
- Insufficient progress to identify residual impacts and subsequent compensation and potential mechanisms including a protective bond for potential impacts;
- insufficient progress with the proposed Landscape and Environmental Management Plan;
- lack of wider progress with habitat regulations assessment and ecological impact assessment.

2.6 The **key areas** of concern for National Trust relate to:

- the proximity of construction to National Trust land and scale of impacts associated with the Marine Offloading Facility and Breakwaters;
- the proximity of construction in relation to occupied residential tenanted properties;
- the proximity of land raising in relation to designated land owned by National Trust.

2.7 The response of National Trust to this consultation should be read alongside our submission made in December 2014 and February 2016. Many of the areas of concern expressed in the previous consultations still remain outstanding and unresolved. We are thus concerned that the timescale being brought forward is

seeking to move forward a full Development Consent Order application, without resolution of fundamental aspects of the scheme.

### **3 Do you have any comments on the Preliminary Environmental Information Report?**

The following commentary is provided in relation to the PEIR.

**3.1 Chough.** The visitor experience at Cemlyn is frequently enhanced by sight of Chough. There is an important foraging link between Cemlyn and Holyhead. This element needs to be explored further and recognised at this stage.

**3.2 Sandwich tern.** The sandwich tern is at the heart of National Trust ownership and our conservation management at Cemlyn. The population at Cemlyn are part of a wider population that breed across the Irish sea with fundamentally linked sites at Hodbarrow, Strangford Lough, Dublin Bay and Lady Island Lake. We expect the impacts on this population to be examined further within the DCO, HRA and any Marine Licence. To date insufficient information has been provided to assure us that the impacts have been properly assessed. Disturbance to terns from noise, vibration, light, and change to feeding behaviours remains a fundamental concern of National Trust. It is understood that Horizon have completed tracking work on Sandwich Terns during the summer of 2016, the conclusions of this work are not available. National Trust has progressed sandwich tern tracking on its East Coast properties to establish baseline data. A robust period of appropriate tracking of feeding behaviour is required to enable an adequate assessment to be brought forward. It is hoped that Horizon bring this forward during Summer 2017, and inform and engage key partners in this process, which has not happened during the Summer 2016 boat tracking work.

**3.3 Marine Mammals.** Cemlyn is an important location on the Welsh coast for sighting marine mammals and this interaction forms part of the value of the property. The impact of the proposed North Anglesey Marine SAC is neither adequately assessed nor recognised, and further information is required on marine mammals. Construction impacts relating to sediment plumes (from construction runoff and spoil disposal), noise and vibration, and operational impacts relating to the fish acoustic deterrent system are key outstanding issues for National Trust.

**3.4 Drainage and Water Discharge.** The lack of sufficient information on drainage and potential impacts of suspended sediment within Cemlyn lagoon and in the marine environment remain a fundamental concern. The application does not demonstrate that sufficient management controls can be achieved, and an adequate discharge quality can be achieved. The quality of the marine environment and Cemlyn lagoon are fundamental facets that underpin National Trust presence in Cemlyn. This element remains a fundamental unresolved issue and needs to be fully addressed as part of the submitted DCO and SPC. Insufficient information has

been provided on how drainage control and management can be achieved at the bottom of land raising areas without sufficient land ownership.

**3.5 Groundwater and Surface Water.** The Preliminary Environmental Information Report recognises that construction phase and subsequent operation of the site has the potential to significantly affect both ground and surface water hydrology and also identifies water quality related risks. We are concerned that these issues tend to be viewed in isolation rather than in combination. For example, decreased permeability due to soil compaction during construction is identified as relevant to flood risk but not water quality (potential for sediment transport). Similarly, changes to groundwater volumes may have an impact upon water chemistry (critical for groundwater dependent features such as Tre'r Gof SSSI) as well as volumes – changing the relative contributions of groundwater and surface water. Changes to the hydrology of the area through construction will also affect background water chemistry (e.g. base status) - this is not considered at present.

3.51 The assessment of impacts does not recognise the spatial and temporal heterogeneity of hydrologically related impacts. There is no acknowledgement of runoff pathways and that these will vary throughout the site (and indeed will be altered by the construction activities). As such the adoption of a blanket 15m buffer around water courses may be adequate in some cases but not in others. Furthermore, there is little acknowledgement that much sediment transport (and hence water quality issues) is associated with high rainfall events which may overwhelm mitigation features and will not be detected through regular monitoring.

3.52 Wastewater treatment options for the temporary facilities present a risk of accidental spillage (storage and tankering away).

3.53 There is insufficient information to determine whether proposed mitigation options for hydrological and water quality impacts are adequate.

3.54 The separation of the SPC application from the main DCO is a key aspect of NT concerns in relation to surface water drainage. National Trust remains concerned that fundamental issues relating to the protection of designated sites for nature conservation remain unresolved.

**3.6 Air quality and Dust Control.** The Preliminary Environmental Information Report indicates that dust emissions could have significant adverse effects and that work is at an early stage in respect of mitigation measures. It is hoped that this work progresses and appropriate controls can be achieved for NT residential properties and at appropriate levels commensurate for future visitor access. A commitment to a future online monitoring programme is expected.

**3.7 Noise issues.** Information provided in relation to specific National Trust residential property is not considered sufficient at this stage. The aggregation of data (for NT the western property aggregation) does not allow the determination of

impact upon individual properties. Further specific information is thus required for construction and operation in relation to Felin Gafnan and Tyddyn Sydney to enable this matter to be considered further. It is hoped that early progress and commitment to a noise construction and operation monitoring scheme is brought forward for consideration.

### **3.8 Vibration and Blasting.**

3.81 The PEIR indicates that “as part of certain construction activities blasting may be required” (para B4.20) and that the effects have been assessed. No detail is provided on this assessment. Air over pressure is assessed to cause minor to moderately significant effects at receptors “close to WNDA”. Those properties have not been identified and further clarification and detail on this aspect is required. During the construction of the MOLF underwater blasting may be utilised. This is predicted to have significant adverse effects (para B5.54) but this is then followed by a statement relating to mitigation. Further detail on mitigation is required relating to residential and the marine environment.

3.82 The potential impact due to vibration as a consequence of construction or blasting at Felin Gafnan Corn Mill is not mentioned. Given the proximity to the MOLF and breakwater construction operations that could include blasting this seems to be a major omission. National Trust has raised this issue to Horizon without acknowledgement over a long period and the Mill appears to be missing from Horizon thinking at the current time. Structural surveys have been completed and funded by National Trust on properties owned by in the area.

### **3.9 Coastal Processes.**

3.91 From the evidence provided in the PAC 2 consultation documents, including the Stage 2 PEIR, relatively little progress appears to have been made in the assessment of potential impacts on coastal processes and physical aspects of the marine environment, which in turn are related to aspects of marine, freshwater and terrestrial ecology, water quality and birds (amongst other topics).

3.92 It is stated by the Applicant that full results of the EIA would not be expected before completion of the Environmental Statement (ES) which will accompany the Development Consent Order (DCO) application, submission of which is not expected before May 2017. However, it is anticipated that applications for planning permission for the onshore construction works under the Town and Country Planning Act 1990, and for Marine and Harbour Licences to allow the marine works to commence, will be made much earlier, potentially later in 2016. In order for an informed assessment to be made by the regulatory authorities, including consideration of the Habitats Regulations Assessment (HRA) and Water Framework Directive Assessment (W DFA), there will be a requirement for a much greater level of information about the environmental baseline and potential impacts of the proposed works on coastal and marine processes, sediments and landforms than is currently available. The HRA

Interim Report provided for PAC2 contains virtually no consideration of how impacts in coastal processes and sediments might, in turn, impact on the physical and chemical characteristics of Cemlyn Lagoon, Esgair Cemlyn and neighbouring coastal / nearshore areas, or on other receptors such as fish, marine mammals and birds.

3.93 The virtual absence of hard information about the methods used in the baseline surveys and modelling studies, and the lack of results, make detailed evaluation of potential impacts and requirements for possible mitigation measures impossible at this time. However, generic consideration of the proposals suggest that the impacts of the construction works, and of the longer term presence of breakwaters and other structures, on the wave climate and sediment erosion / transport/ depositional regime in Porth-y-Pystyll and Cemlyn Bay could potentially be significant.

3.94 Major issues relating to coastal processes which remain of concern to National Trust include the following:

- The effect of construction of the temporary causeway, breakwaters and MOLF on suspended sediment concentrations and other aspects of water quality during the construction phase, especially with regard to Cemlyn Bay and Cemlyn Lagoon;
- The effect of the temporary causeway and permanent breakwaters on tidal circulation, water levels, current speeds, wave conditions, bed shear stresses and patterns of sediment erosion within Porth-y-pistyll and Cemlyn Bay, and the potential consequences for the stability for the Esgair Cemlym shingle barrier (and hence the lagoon and bird nesting islands);
- The adequacy of the baseline data capture being undertaken (relating to tides, currents, waves, sediment transport, morphological variability of coastal features and the sea bed);
- The adequacy of the hydrodynamic and sediment transport modelling being undertaken;
- The adequacy of the assessment of the impacts of the development in the light of possible climate and sea level change;
- The adequacy of consideration of the potential impacts of decommissioning (including possible removal or otherwise of the breakwaters and other structures).

**3.10 Habitat Regulations Assessment.** The availability of a HRA Interim report is welcomed and support is given to a single HRA Evidence Document that supports the DCO and all land and consents. National Trust has been involved in one meeting to discuss HRA, and it was indicated that Evidence Plan workshops would be completed with a range of partners including a specific Cemlyn based workshop. This work has not progressed to date.

**3.11 Lighting issues.** This aspect of the scheme has not progressed sufficiently with potential impact on ecology and National Trust tenant amenity. The impact of lighting during construction will need to feed to considerations within the HRA, greater specific detail is thus required for both construction and operation. Specific detail is required for lighting the breakwater, MOLF, and security fencing at the boundary of NT land ownership.

### **3.12 Cultural Heritage and Archaeology.**

3.12.1 Commentary on this aspect overlaps with our comments below in relation to Landscape. Appropriate historic buildings are recognised at Felin Gafnan Corn Mill, the corn drying house and mill house at Felin Gafnan, Cemaes Mill, Caerau House and associated stables and gate piers and Capel Bethesda in Cemaes. The documentation states: “As a result of the position of these buildings within the landscape it is not possible to mitigate these effects”. This is not an acceptable statement. The impacts on individual listed buildings owned by National Trust, and their group value in the Cemlyn area, are underestimated in PAC2.

3.12.2 PAC2 refers to mitigation measures for Cestyll Garden and the production of a Conservation Statement intended to manage the preservation and significance of Cestyll Garden. This principle and commitment should be extended to include Felin Gafnan which is on the garden boundary. Setting of listed buildings is not adequately explored in the information to date and the role of removal of existing Power Station buildings in setting is overstated given the fundamental impact of new construction.

3.12.3 A summary table of assets would be helpful in the final document to help interpretation of submitted maps.

3.12.4 National Trust has a wide portfolio of natural and heritage assets in North Anglesey. Many lie within the identified zone of visual influence, and heritage search area for the proposed Wylfa Newydd. The scale of potential impact is illustrated in Appendix 1 of this submission, illustrating the importance of National Trust land ownership, and the wider cultural heritage implications of any decision for this sensitive area of coast.

### **3.13 Landscape and Visual Impact.**

National Trust would wish to raise the following issues:

-the photomontages provided at this stage are inadequate in terms of quality, the choice of locations and direction of view. Insufficient attention has been made as to the impact in the Porth y Pistyll area. The visual model at the Open events appears to bring forward significant structures adjoining the bay to create surface water drainage lagoons these are not included within the submitted PAC2 documentation;

-insufficient information has been provided on the impact of the mounding near to the existing Lon Cemlyn. No sections have been provided, and the approach to detail on mounding is very light, perhaps underestimating the scale of impact on the AONB and land in NT ownership;

-insufficient information has been provided on the interim waste and spent fuel buildings to be located adjacent to the north of land in National Trust ownership;

-there is no acknowledgement in PAC2 as to how the decommissioning of the existing power station will affect the do nothing scenario. The landscape and visual quality of the AONB will improve with the lowering and removal of existing Wylfa buildings; this is not recognised within the submission;

-National Trust considers that there is insufficient land ownership within Horizon control to enable adequate mitigation and to avoid mitigation that has significant adverse effects of its own. As such the scheme proposed at PAC2 cannot achieve policy requirements due to the impact on landscape and visual impact on AONB;

-insufficient attention has been made to the loss of the natural coastline within the AONB. The design of MOLF and breakwater will be crucial to mitigating the substantial adverse impacts on the AONB. Insufficient information is available to date on how an acceptable design can be achieved;

-the MOLF, land raising, fencing and proposed Main site will impact on the setting of listed buildings, a number are in the ownership of National Trust. PAC2 accepts fundamental setting issues but does not explore the significance of this issue, nor provide any mitigation or propose compensation;

-National Trust land at Felin Gafnan will be 'trapped' between the MOLF, the main site and the coast. PAC2 demonstrates that the impact on Felin Gafnan will be overwhelming in terms of residential amenity, land use and landscape character.

-support is given for the proposal to reroute the Wales Coast Path along the coast through the MOLF and maintaining the existing route via Felin Gafnan. How this can be achieved in practice needs further clarification. Details are not available on the security fencing and structures proposed in this specific location.

-support is given for the development of a Masterplan for the Main site, although this document needs greater detail. It is currently very light touch on boundary land for National Trust and the specific area of Porty y Pistyll, compared to on site accommodation and the simulator and training facility. The document places considerable emphasis on Anglesey and North Wales generally as “industrial in character”. This does not give an appropriate balance to either Cemlyn, North Anglesey or North Wales which have some of the most wild and beautiful undeveloped locations within the UK. Much of the document relates to the associated developments where cross sections are provided. A greater emphasis is needed on what will be key areas for a future decision: the main site; MOLF;



breakwaters and wider land area around Wylfa Newydd. Support is given to the high level statements on colour, materials, palettes and need for further progress and specificity and perhaps wider dialogue on options moving forward. This has not happened with non-statutory consultees.

**3.14 Landscape and Environmental Management Plan.** Insufficient progress has been made on this document. National Trust has been involved in one meeting to discuss the LEMP which currently is not fit for purpose, given the scale of residual impacts identified and emerging within the PAC2 consultation.

**3.15 Loss of marine habitat.** The scheme brings forward the direct loss of around 40ha of sea bed plus other areas destroyed in potential disposal of MOLF spoil. The application currently brings forward no compensatory habitat replacement or recognition of this issue. The loss of marine habitat to construct the MOLF in Porth y Pistyll, adjoining land in National Trust ownership is a significant negative impact. The current ambivalent approach to coastal and marine habitat loss is unacceptable and Horizon needs to bring forward suitable and appropriate marine compensatory measures.

**3.16 Environmental Standards.** National Trust opposes the approach being taken forward by Horizon to reduce and dilute environmental policy standards within the Anglesey and Gwynedd Local Development Plan. National Trust opposes the approach being taken forward by Horizon to reduce the protective policies to landscape and ecological designations within the Anglesey and Gwynedd LDP.

**3.17 Storage of Radioactive Waste.** It is noted that PAC2 brings forward a preferred location for interim long term storage of spent fuel, intermediate level and dry high level radioactive waste. The proposed location is near to the boundary of land owned by National Trust and its tenanted property at Felin Gafnan. The proposal seeks to establish a conservative timeline of 140 years after the end of electricity generation, meaning land owned by National Trust will be affected by this aspect for over 200 years.

Thank you for your consideration. For further information please contact John Pearson, Planning Adviser, National Trust [John.pearson@nationaltrust.org.uk](mailto:John.pearson@nationaltrust.org.uk)