

LATE SCOPING CONSULTATION RESPONSES

Consultation bodies have 28 days to respond with any comments, stating either the information that they consider should be included in the ES or that they do not have any comments.

Any responses received after the deadline will not be considered within the scoping opinion but are forwarded to the applicant for consideration in accordance with the policy set out in the Commission's Advice Note 7: Environmental Impact Assessment, Screening and Scoping.

The following EIA scoping consultation responses were received after the consultation deadline specified under legislation and therefore did not form part of the Commission's scoping opinion.



Llywodraeth Cynulliad Cymru
Welsh Assembly Government

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Eich cyf . Your ref
Ein cyf . Our ref SF/JD/0210/10

4 May 2010

For the attention of David Cliff

Dear Sirs

**PROPOSED NUCLEAR POWER STATION AT WYLFA, ANGLESEY
PROPOSAL BY HORIZON NUCLEAR POWER: PREPARATION OF
ENVIRONMENTAL STATEMENT**

The Welsh Assembly Government wishes to contribute to the pre-application consultation on the proposed new nuclear power station at Wylfa, Anglesey by way of identifying items that it would wish to see included in the Environmental Statement for the proposed development. This letter takes into account the scoping opinion issued by the Commission in December 2009.

Under the Government of Wales Act 2006 the Assembly Government has responsibilities in respect of Wales for a range of public health and environmental related issues. The proposed nuclear power station at Wylfa has the potential to affect adversely public health and the environment in Wales. The Environmental Statement (ES) for this project will need to reflect these issues.

The Assembly Government would therefore wish to see consideration within the ES of the impact of the building, operation and decommissioning of the proposed new nuclear power station on human health and the environment in Wales. Before detailing issues of concern the Assembly Government would like to comment that Horizon Nuclear Power Ltd has not yet decided either the type or number of reactors it proposes to build at Wylfa. This fundamental issue must affect e.g. potential

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radioactive and other discharges from the site and therefore the ability accurately to consider these matters in the ES.

The scoping opinion issued by the IPC does not suggest in detail how radioactive matters should be considered. However radioactive discharges are fundamental consideration of the potential health and environmental impacts of nuclear power stations and the Assembly Government would wish to see the inclusion of a separate section in the ES where all information about radioactive discharges is collated for ease of reference. The Assembly Government has particular concerns about current proposals for the management and long term storage of radioactive waste and spent fuel on site. It considers that these matters have not received sufficient public consideration and debate. In the context of the proposal for a new nuclear power station at Wylfa the Assembly Government would therefore wish to see very detailed consideration of the local impact of these issues in the ES.

Specifically the Assembly Government would wish to see the ES include details of:

- The effect, in the long term and the short term, of radioactive discharges to land, air and water during the normal operation of the power station, including the management of radioactive waste and spent radioactive fuel.
- The potential radioactive emissions from the power station site during an operational emergency or as the result of a terrorist attack, and evidence of steps that will be taken to prevent the potential harmful effects of these. Consideration of this item should include identification of the maximum credible accident potentially able to affect the site, and the potential maximum effect of a terrorist attack on the site.
- The potential long term effect on human health and the environment of proposals to store spent fuel on site (which is currently expected to be for up to 160 years) before its transfer for further management and disposal. Consideration of this item should include clear proposals for the spent fuel store, including its protection against a possible terrorist attack.
- The potentially harmful effects of the management of radioactive waste and spent fuel on site, including the potential use of near surface/near site disposal, and of the transport of radioactive waste and spent fuel for further management and disposal elsewhere.
- The management structures and safeguards by which the power station operators will ensure that they stay within the environmental and operational requirements of the appropriate regulatory bodies, e.g. the Environment Agency and the Nuclear Directorate of the Health and Safety Executive, in order to avoid adverse outcomes for public health and the environment.
- The above points relate to radioactivity, however, construction, operation and decommissioning of the power station will create a range of non-radioactive wastes, emissions and discharges from and in relation to the site including those caused by transport to and from the site, and also including noise and vibration from the site and related transport during its construction, operation and decommissioning. The ES should include a full assessment of the potential harm to human health and the environment of these non-radioactive issues, and how this will be prevented or mitigated.
- There are a number of European, UK and local nature conservation designations in the vicinity, including Cemlyn Bay Special Area for

Conservation (SAC) and Ynys Feurig, Cemlyn Bay and the Skerries Special Protection Area (SPA). In addition there are a number of Welsh coastal terrestrial sites, and substantial marine protected areas to the south. Unprotected marine areas can also be habitat for significant populations of marine European protected species, Biodiversity Action Plan (BAP) priority marine species, and birds. The area is also surrounded by a coastal Area of Outstanding Natural Beauty, indicating the landscape value of the Island. The ES should give full consideration to the potential impacts of the proposed development on these protected sites and species as well as the risks of long-term accumulation of all emitted radioactive and non-radioactive contaminants in this ecosystem.

- The scoping opinion includes a number of observations relating to flood risk at the site. The Assembly Government endorses those comments and supports the IPC's calls for the provision of additional information. We would also like to see that information take into account potential impacts of climate change and the uncertainties associated with climate change. In the future we are expecting changes to rainfall patterns and sea levels that will increase the risks of flooding and coastal erosion across Wales and the UK. Given the expected life of the proposed development any measures taken to mitigate flood and coastal erosion risks should take full account of climate change and its anticipated impacts. For example there is a possibility that sea levels will rise at a much greater rate than presently forecast the effect of which could be demonstrated by an appropriate sensitivity test. Working with natural processes and making use of natural features may help manage the risk in a more sustainable manner and advice on such processes is available from the Environment Agency Wales.
- The potential long term effects on water resources from abstraction licences due to an increase in water demand from construction and consideration of the effects of all water discharges and abstractions to and from the operation's plant, as well as any impact caused by construction. These effects should be considered in light of the EC Habitats Directive (92/43/EEC) and Water Framework Directive (2000/60/EC).

There has been much public perception of risk associated with living adjacent to a nuclear power station. Following this public concern, the Committee on Medical Aspects of Radiation in the Environment (COMARE) has issued a number of public statements in relation to the North Wales Coastal area. This highlights the importance of ensuring full and open public engagement and consultation in relation to any proposals.

It is Welsh Assembly Government policy to ensure that Health Impact Assessments (HIA) are undertaken to inform decisions on major developments. Whilst we appreciate that HIA is not a statutory requirement for current energy applications, the Assembly Government would strongly advocate its use in relation to the proposed Wylfa development.

HIA must be conducted openly and in partnership with those affected by, or with an interest in, the project and its outcomes. The Assembly Government has supported the development of the Wales Health Impact Assessment Support Unit over the past 5 years. The robust methodology they have developed offers a sound basis on

which to build. An HIA would complement and not replace an EIA in the assessment of potential impacts on human health and wellbeing. The Assembly Government considers that an HIA should be prepared for Wylfa B, or that the equivalent information should be presented in the ES followed by an equivalent public engagement process.

Further information is available from the Wales Health Impact Assessment Support Unit website at the following link -

<http://www.wales.nhs.uk/sites3/home.cfm?OrgID=522>.

The Isle of Anglesey County Council in its response to the consultation on the scoping opinion for the ES raised concerns about the socio economic impacts of this project. Although these matters may not be directly relevant to the ES the Assembly Government would wish to see them fully considered by the developer Horizon in its application to the IPC. Horizon will need to give consideration to the socio economic impacts during both the construction and operational phase of the project. There will be impacts on the local labour market, local housing market and on the Welsh Language in local communities. The Assembly Government would wish the developer to work in a positive way on these matters with Anglesey County Council and partners. We would also wish for the developer to work with the Welsh Assembly Government and education providers on the skills required during this period and supply chain opportunities available to maximise the benefits for the local area of North Wales.

The Assembly Government reserves the right to raise other items of concern during the pre-application public consultation on this proposal and if necessary during the post application phase.

I am copying this letter to Alan Reymond and Alan Smith at Horizon Nuclear Power

Yours faithfully

Robert J T Williams
Head of Radioactivity and Pollution Prevention