

Ynys Môn

THE ISLE OF

Anglesey

Wylfa Newydd

Local Impact Report

Chapter 1: Introduction

December 2018

PINS Ref: EN010007



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1.0 Introduction

1.1 Purpose of the Local Impact Report

1.1.1 This Local Impact Report (LIR), submitted to the Examining Authority by the Local Planning Authority under Section 60 of the Planning Act 2008, follows guidance issued by the Planning Inspectorate¹, and seeks to provide a balanced view of positive, neutral and negative local impacts as defined in Table 1.

Table 1: Approach to defining and classifying impacts adopted in this LIR.

<i>LIR Categorisation</i>	<i>EIA Equivalent</i>	<i>Description</i>
Positive	Moderate or Major Beneficial	Effects which are predicted to result in a noticeable or measurable improvement on the baseline which is more than just minor in the context, for example the remediation of contaminated land is (in isolation) likely to be a positive impact, as is the creation of jobs.
Neutral	Negligible or Minor Adverse or Beneficial	Effects which (taking into account any specified mitigation) have no perceptible impact, or only an impact which is insignificant in the context.
Negative	Moderate or Major Adverse	Effects which, even with mitigation, are predicted to result in a noticeable or measurable deterioration on the baseline conditions. For example, increases in pollution, reductions in amenity and increased pressure on resources such as roads, leisure centres or health services may all be negative.

1.2 Structure of LIR

1.2.1 The content of the LIR has been informed by Planning Inspectorate *Advice Note One: Local Impact Reports (April 2012)*. The LIR seeks to inform the Examining Authority of relevant issues of local importance by applying local knowledge, information and evidence to support the Isle of Anglesey County Council's (IACC's), position. Issues and impacts raised are supported by a comprehensive evidence base. Where it is not possible to rely on a conventional evidence base, arguments are presented and are based on local knowledge, experience and professional judgement. It will be clearly noted where this is the case.

1.2.2 The LIR has been split into two separate sections. The first section (Chapters 3–16) contains project wide 'thematic issues'. The second section (Chapters 17 – 22) contains 'site specific issues' as they relate to either the Wylfa Newydd

¹ Advice Note One: Local Impact Reports (Planning Inspectorate, April 2012) ([Link](#))

main site or any one of the ‘associated development’ sites. Each of the thematic and site-specific chapters follows a common format, setting out:

- a) Overview of Impacts: Drawing out and summarising key issues and impacts – both individually and cumulatively relating to the project and local circumstance.
- b) Context: ‘Framing’ the impact in terms of the wider local context.
- c) Impacts & Evidence Base: A description of the impact and a summary of evidence demonstrating why measures are required to mitigate the impact.
- d) Policy Position: The local policy context and the link between this, the impact and the mitigation sought.
- e) Gaps in Information (if applicable): Highlights any remaining gaps that prevents the IACC from being able to make a proper assessments.
- f) DCO Obligations & Requirements: IACC’s views on adequacy and the need for additional and alternative forms of mitigation.

1.2.3 For the avoidance of doubt, obligations and requirements proposed by the IACC are a preliminary view and position. They are not, at this stage, a full list of requirements and obligations nor finalised wording for each.

1.3 Foundations of the LIR

1.3.1 Economic and Social

1.3.1.1 The IACC has, for over a decade now, adopted and maintained a supportive position in respect of potential Nuclear New Build. Prior even to the adoption of EN-1² and EN-6³, and based upon positive socio-economic benefits experienced from the existing Magnox nuclear station, nuclear new build presented a potential means for securing important short and long term benefits for the island’s economy. These, in turn, would underpin the wellbeing of its future generations. The island’s economy can, at best, be considered fragile (a statistical County Profile is included at Annex 1A). Encouraging and supporting a diverse portfolio of energy developments on the island, including nuclear new build, thus became a strategic priority for the IACC through the Energy Island Programme⁴.

1.3.1.2 The IACC does, however, fully recognise and appreciate (as set out in its Relevant Representation, August 2018⁵) that, given the scale and complexity of the project, the Wylfa Newydd development must be the right scheme for Anglesey. It must fully respect the Island’s unique character and very special sense of place defined for the ExA in ‘Anglesey: A Sense of Place’ (Annex 1B), and that its support for the proposed development, and social license for the developer, does not come at any cost.

² EN-1 Overarching National Policy Statement for Energy. [\(Link\)](#)

³ EN-6 National Policy Statement for Nuclear Power Generation [\(Link\)](#)

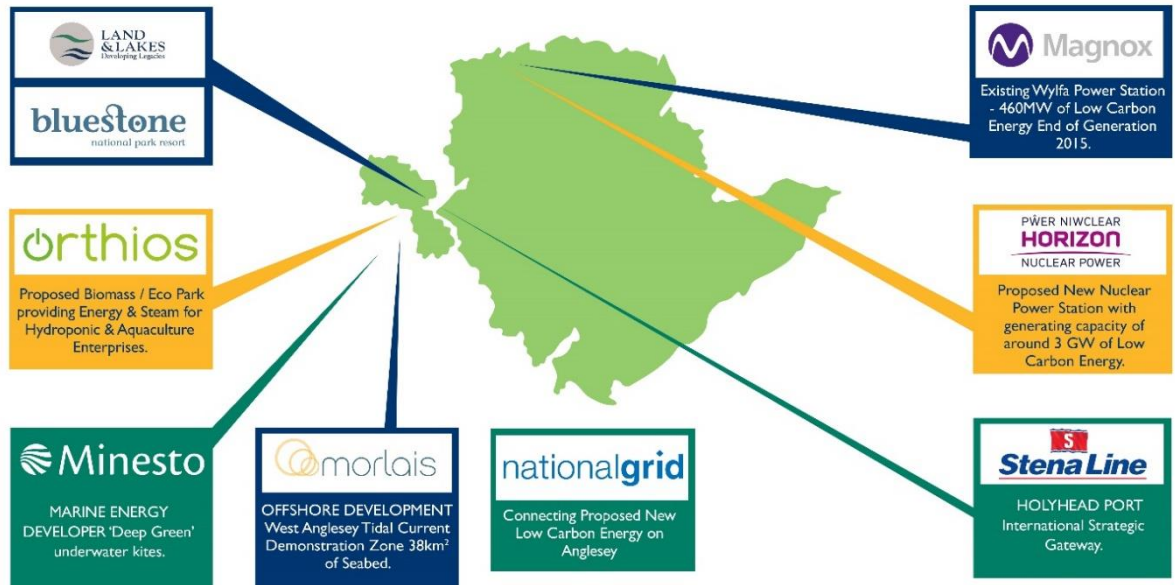
⁴ Anglesey Energy Island Website. [\(Link\)](#)

⁵ IACC Relevant Representation, August 2018 [\(Link\)](#)

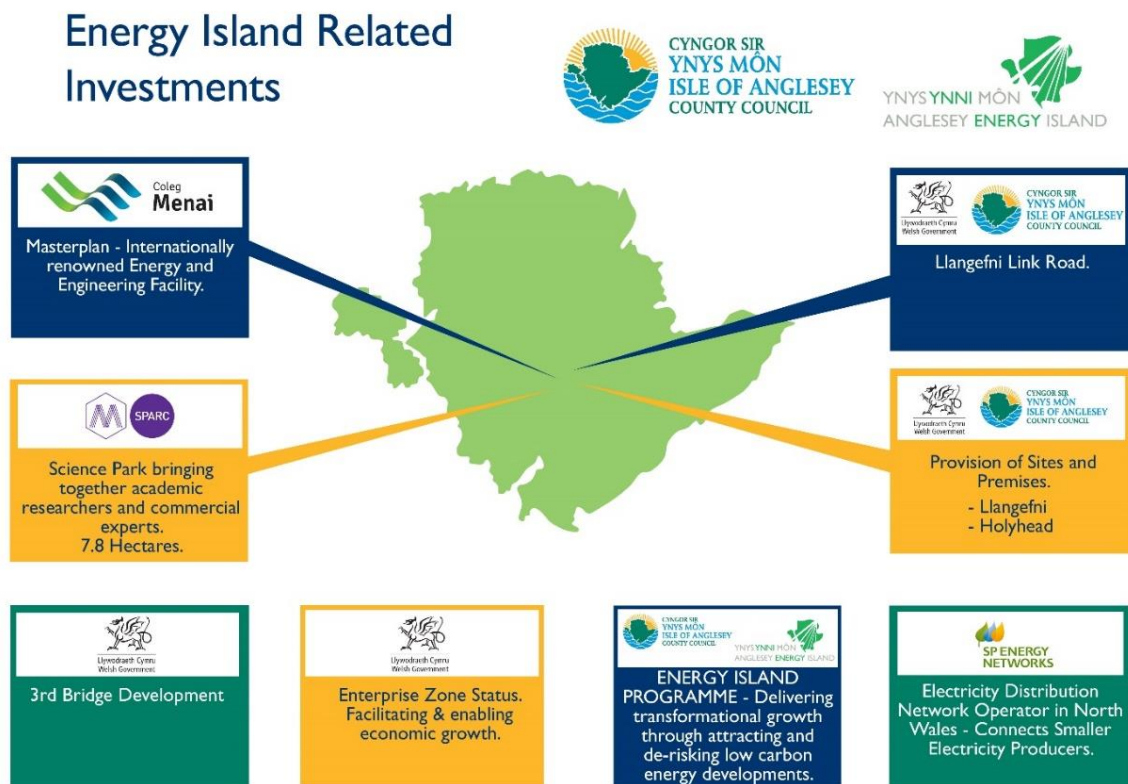
1.3.1.3 The Anglesey Energy Island Programme, established in 2010, seeks to facilitate and progress a collaborative partnership of public, private and third sectors organisations to de-risk and maximise positive outcomes from a diverse suite of energy related investments (Map1 & Map2, IACC Nov 2018).

Map 1: The Anglesey Energy Island Programme – Developments.

Energy Island Developments



Map 2: The Anglesey Energy Island Programme – Related Investments



1.3.2 Community & Language

- 1.3.2.1 As an island community, Anglesey and its people undoubtedly feel a strong sense of shared identity going back over many centuries. Many families have worked the same areas of land for generations.
- 1.3.2.2 “Community spirit and good neighbours” was one of the key facets of Anglesey life which contributed to well-being as identified by participants in the 2017 Well-being Assessment surveys for the 2018 Well-being Plan. This is further reinforced by the predominant and continued use of a shared language - Welsh.
- 1.3.2.3 The Welsh language and culture is a golden thread which runs throughout Anglesey society. It binds the strong sense of community and is inherently linked to the history that defines the area and its inhabitants. It is a natural element of everyday life, children are raised and schooled through the medium of Welsh and through the Welsh traditions and culture.
- 1.3.2.4 This LIR, and the policy context which underpins it, thus gives considerable weight to the safeguarding and enhancement of the Welsh Language and culture alongside other elements which influence Anglesey’s strong, cohesive communities.

1.3.3 Natural Environment

- 1.3.3.1 Apart from the obvious fact that Anglesey is physically set apart from mainland Wales, it is considered by those who live here or who visit to have a particular natural beauty and tranquillity which makes it different to anywhere else in the UK.
- 1.3.3.2 Anglesey has an important and valuable natural environment. On Anglesey, it is possible to come across wildlife that is no longer commonplace on the mainland and certain species and habitats are rare, endangered or valuable across the European Community as a whole. The island is rich in heritage assets, spanning back over millennia. Its landscape, its spectacular coastline and beaches (which make up the Anglesey Area Of Outstanding Natural Beauty, interspersed with stretches of Heritage Coast), are a valuable economic assets as well as being key to the well-being of local residents.
- 1.3.3.2 Considerable regard is also, therefore, had in this LIR for the exceptional value of the natural environment and the need to ensure it is not compromised by new development.

1.3.4 Well-being, planning policy and legacy

- 1.3.4.1 The starting point for all policy development is the legislative framework; in this case particular attention requires to be given to the objectives and goals of the Well-Being of Future Generations (Wales) Act 2015⁶ which all public authorities in Wales are under a duty to promote. This includes IACC as a local planning authority ensuring that its local planning policy promotes sustainable development and supports the wellbeing goals. The promotion of well-being of future generations necessitates the planning of projects (and mitigation measures) with a view to the longer term and ensuring that future generations inherit positive outcomes. To do this major, nationally significant projects such as Wylfa Newydd must provide benefits and opportunities throughout their entire lifecycles. The promotion of the well-being of future generations in the context of Wylfa Newydd is addressed most clearly through the concept of legacy. In the IACC's opinion 'legacy' can take a number of forms, including on the ground changes or positive changes in the Island's socio-economic profile and maintaining environmental quality and community distinctiveness.
- 1.3.4.2 Over the next few years, the Isle of Anglesey is expected to host a series of major projects. These complex, large scale, high value infrastructure projects are likely to create a number of positive benefits for, as well have negative impacts on, Anglesey for a number of years. The IACC expects all major projects to deliver a positive legacy for Anglesey. Legacy incorporates well-being in its widest sense, sustainability and the need to ensure that proposals deliver considerable benefits for the host community after the main construction phases. The IACC considers that compliance with and commitment to a positive legacy is essential to meet the requirements of well-

⁶ Well-being of Future Generations (Wales) Act 2015 ([Link](#))

being and that is should be looked at in a considerably wider context than just future employment offered by construction and operational job opportunities. The Island's approach has therefore 'hard-wired' the concept of legacy throughout, including the JLDP, SPG and the Legacy Framework.

- 1.3.4.3 One of the key questions asked in considering the test of soundness for the JLDP was whether the plan has regard to the Well-being goals. The JLDP's vision demonstrates an expectation that the Project would provide a legacy by *"improving quality of life for existing and future generations" "transformational economic opportunities", 'contributed to transforming the local economy'* which will all promote the well-being goals. In order to balance the adverse impacts of the project, the benefits and mitigation to be delivered must ensure a legacy for the host community's future generations, not just the host community during construction. The inclusion of Wylfa Newydd specific policies within the JLDP was a deliberate choice which evolved through the public examination of the plan and which was supported by the developer, Welsh Government and the Inspectors. That plan and the specific policies therein are permeated with requirements for legacy and the importance of delivering it. The plan, including this focus on legacy, was found to be sound by the inspectors. Guidance on addressing the impacts of the development and providing a sustainable development which leaves a meaningful, positive legacy is set out in the adopted Wylfa Newydd Supplementary Planning Guidance. This was originally adopted in 2014, revised in 2017 and formally adopted in 2018 to take account of the JLDP and the Well-being of Future Generations Act.
- 1.3.4.4 The concept of legacy is key to the approach taken in the JLDP. The plan sets out 19 strategic objectives. Strategic Objective SO5 provides that all development in the plan area should support the principles of sustainable development, IACC considers that in the context of Wylfa Newydd sustainable development includes seeking to provide substantial legacy benefits from large scale development. This includes designing aspects of the project so as to allow continuing or re-use post the construction phase, and developing plans and strategies to maximise long term, intergenerational benefits. SO 9 seeks to *"Support and capitalise on the development of the Wylfa Newydd Project and associated development to maximise socio-economic opportunities for local business and sustainable employment opportunities for local people, including facilitating a suitable network of Wylfa Newydd Project-related associated development sites while ensuring that adverse effects of the Wylfa Newydd Project on the local communities are appropriately avoided, or mitigated and where appropriate legacy benefits are provided"*.
- 1.3.4.5 The plan's overall strategy requires that all temporary uses (not just those for Wylfa Newydd) are designed to facilitate alternative long-term uses in the future, thereby providing a legacy (The Strategy, Overview, 5.3). The section of the plan dealing with NSIPs requires all NSIP developers to *"identify potential legacy uses, including transport, social, economic and community infrastructure which would benefit the community in the long term"* (6.3.6) and *"the councils require the Project to deliver legacy benefits to local communities during the Plan period or beyond the construction period"*(6.3.17) .

1.3.4.6 In September 2017, the IACC adopted a Legacy Framework ‘A thematic Framework to realise the IACCs legacy aspirations’ (Annex 1C), which has been prepared to outline to developers the IACC’s aspirations of their respective major projects. It aims to provide a thematic representation of what the Island could look like in 2025 if the IACC’s long-term aspirations, and those of partners, are realised and achieved. This thematic framework has been formally adopted by the IACC and clearly articulates the IACC’s legacy aspirations to prospective developers in accordance with the Wellbeing goals, the JLDP and the Wylfa Newydd SPG.

1.3.5 The Well-being of Future Generations Act (Wales) 2015

1.3.5.1 The Well-being of Future Generations (Wales) Act 2015 places a duty on Welsh public bodies to carry out sustainable development. In this Act, sustainable development is defined as *“the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals”*. In this context, the sustainable development principle means that public bodies *“must act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs”*.

1.3.5.2 In light of the above and of the very clear link between the well-being of future generations and legacy, the IACC has commissioned a Wellbeing Assessment to consider how the Wylfa Newydd DCO Project could impact on well-being over the lifetime of the project (Annex 1D). To assist in undertaking the assessment, as well as in informing other parts of this LIR, the IACC has also produced a ‘Sense of Place Report’ (already referenced as Annex AA). The report (endorsed by the IACC’s Executive on 22nd October) sets out what makes Anglesey such a unique and special place to live, work and visit.

1.3.5.3 The Wellbeing Act and the duties under it bind all public bodies making decisions within Wales. As the UK Government’s Secretary of State for Business, Energy and Industrial Strategy will be making a planning decision on a project in Wales by determining this application, the IACC submits that the Wellbeing legislation should be considered to be an important and material matter under section 104 or 105 of the Planning Act 2008 as applicable.

1.3.5.4 The Future Generations Commissioner for Wales wrote to UK Government Ministers on 3rd March 2018 seeking to bring to their attention the implications of the Act for the decisions that they make relative to Wales. She noted that the Act requires the 44 Welsh public bodies it covers to carry out sustainable development, which includes for the social, economic, cultural and environmental well-being of Wales. She noted that whilst UK Government departments are not covered directly by the Act that it could be considered common sense and beneficial to all communities in the long-term that when making and implementing UK Government decisions in Wales it is done in a manner that is sympathetic to the duties of those covered by the Act.

1.3.5.5 Having regard to the above the IACC submits that:

- a) The Secretary of State should take deliberate and genuine account of the Act in making the final decision on this DCO application.
- b) The Examining Authority should also take deliberate and genuine account of the Act in considering the application and reporting to the Secretary of State.
- c) The IACC as the host Local Planning Authority should demonstrate how it is meeting its duties under the Act in its decision making in relation to this DCO.
- d) Horizon Nuclear Power, can, and reasonably should be expected to use the Act as a framework for bringing forward, developing and potentially implementing their proposal.

1.3.6 The Joint Local Development Plan

1.3.6.1 A detailed review of the policies set out in the Joint Local Development Plan (JLDP) is contained within the Policy Framework chapter of this LIR (Chapter 2). JLDP policies have, however, been developed specifically and deliberately to take account of Wylfa Newydd and therefore inform this LIR.

1.3.7 Wylfa Newydd Supplementary Planning Guidance (SPG)

1.3.7.1 An outline of the Wylfa Newydd SPG is also contained in the Policy Framework section of this LIR (Chapter 2). It outlines the IACC's vision and objectives for the Wylfa Newydd project and provides clear thematic and site specific guidance to Horizon on the IACC's expectations. Again, post-construction legacy is paramount. The SPG has been instrumental in the preparation of this LIR and should be read in conjunction as it provides the IACC's position in relation to each thematic issue and site.

1.3.7.2 It is an important and significant consideration for both the proposed main site development as well as the proposed associated developments. These would have been subject to a TCPA had the Wales Act not have been enacted in January 2017. Horizon did have the option to submit associated developments to the IACC as Local Planning Authority and not to incorporate into the DCO. The IACC therefore believes that these documents, (along with the National Policy Statements), remain significant regardless of which consenting regime the proposals are considered under.

1.3.8 Legacy Framework: A Vision for 2025

1.3.8.1 In order to better inform and more clearly define the positive 'legacy' and well-being aspirations emerging from the JLDP and the SPG, the IACC adopted a Legacy Framework in September 2017.

1.3.8.2 In its Legacy Framework, the IACC expects the development, construction and operation of major projects on the island to be key contributors to transforming the long term sustainability, wellbeing and 'sense of place' of the Island and its communities – for both current and for future generations. As such, it is imperative that the projects are developed, constructed and

operated in a coordinated, integrated and informed manner to maximise socio-economic benefits, safeguard the Island's economy, language and culture and avoid any possible adverse effects.

- 1.3.8.3 Given the above, legacy and wellbeing are crucial underlying themes, throughout the local policy framework and thus throughout this LIR which should be important and significant considerations for the Examining Authority.

1.3.9 The Proximity Principle

- 1.3.9.1 The final important 'foundation' which has guided the IACC's views on the proposal from the outset, and hence this LIR, is the Proximity Principle (Annex 1E).

- 1.3.9.2 This recognises that many of the direct and immediate impacts of the development will be concentrated in the vicinity of the site, in North Anglesey. As distance from the site increases, it is expected that the direct impacts will diffuse, spreading the impact over a wider area, larger population and more receptors.

- 1.3.9.3 As such, the proximity principle requires that mitigation measures and, where mitigation cannot be provided or will not be sufficient, compensation measures, are concentrated in the areas where direct impacts will be greatest. Accordingly, this LIR includes reference to North Anglesey (especially the Council Wards of Talybolion and Twrcelyn), as the area immediately adjacent to the development which will be most impacted by both physical and non-physical impacts and which, therefore, requires special consideration with regard to the concentration and cumulative effects of predicted impacts.

2.0 Pre-Application Consultation & Subsequent Engagement

2.1 Pre-Application Consultation

- 2.1.1 Horizon's consultation and engagement activities are fully documented in its Main Consultation Report (Application Reference 5.1⁷) and the IACC's views on the adequacy of its engagement has already been communicated to the ExA in the IACC's Adequacy of Consultation Representation of June 2018⁸.

- 2.1.2 Horizon undertook a multi-stage consultation. The IACC made a considerable effort to respond fully, and in detail, in respect of the information provided during each formal stage of the consultation exercise.

- 2.1.3 Government guidance⁹ states that "*where a proposed application changes to such a large degree that the proposals could be considered a new application*

⁷ Examination Library Reference APP-[037]

⁸ Examination Library Reference AoC-001 (IACC's Adequacy of Consultation Letter to PINS, Dated 15th June 2018) ([Link](#))

⁹ "Planning Act 2008: Guidance on the pre-application process" (March 2015) (paragraph 54) ([Link](#))

and therefore the legitimacy of the consultation already carried out may be in question, applicants should undertake a full reconsultation on the new options. In such circumstances applicants should supply consultees with sufficient information to enable them to fully understand the nature of the change (but not necessarily the full suite of consultation documents), and allow at least 28 days for consultees to respond”.

2.2 Approach to mitigation

2.2.1 It is clear that on any basis the Wylfa Newydd project will have substantial adverse effects on the environment and amenity of Anglesey (particularly on North Anglesey).

2.2.2 The IACC submits that the mitigation hierarchy¹⁰ should be used to guide the approach to the project; with impacts being firstly avoided where possible, minimised where they will occur and then mitigated as a last resort. Horizon has proposed a reactive approach to negative impacts in its application which postpones the implementation of mitigation until monitoring shows that an impact is occurring. This is unacceptable. Mitigation in the DCO should be structured to avoid and minimise adverse impacts.

2.2.3 Horizon’s approach fails to align with the mitigation hierarchy by failing to take advantage of clear opportunities to avoid and minimise negative impacts and to instead respond reactively with mitigation only after they have occurred. For example: the Workforce Accommodation Strategy¹¹ states “*Horizon will use a “plan, monitor and manage” approach*”; the Jobs and Skill Strategy¹² provides that the skills fund will respond to demands once they have arisen and an impact has therefore been incurred; and the Planning Statement¹³ provides that the site campus blocks will be constructed to respond to actual demand rather than being used pro-actively to prevent negative impacts. The IACC considers, and has advised throughout consultation, that the approach suggested by Horizon of responding to impacts once they have been evidenced by monitoring (and therefore some time after the impact has begun) is fundamentally unacceptable.

2.2.4 The IACC submits that it will only be acceptable to adopt a monitor and respond approach for impacts which are unquantifiable or which are different to those anticipated in the assessment. In all other cases, the IACC requires the approach to be pro-active in seeking to avoid impacts occurring rather than responding once the harm has occurred. The IACC accordingly seeks mitigation which is

¹⁰ The EIA guidance, The Institute of Environmental Management and Assessment’s Guidelines for Environmental Impact Assessment; Institute of Environmental Management and Assessment (IEMA). 2004 (as referenced in the ES for the application, Chapter B1 Introduction to the assessment process (Doc 6.2.1), Examination Library reference APP- 412 at 1.4.57 and reference RD10) sets out that a strategy of avoidance, reduction, compensation, and remediation should be followed with opportunities for enhancement then to be taken. In this report ‘mitigation’ is used in place of ‘compensation’ to cover a wider range of measures, to avoid any perception that impacts can or should be addressed solely through monetary payments and to prevent causing confusion with compulsory purchase discussions.

¹¹ Doc 8.4, Examination Library reference APP-412 at 1.1.2

¹² Doc 8.3, Examination Library reference APP-411 at 1.1.8

¹³ DOC 8.1, Examination Library reference APP- 4.6 in appendix C

front-loaded, pro-active and in place and operating at an early stage in accordance with an agreed s106 and detailed plans secured through certification or requirements.

2.2.5 Horizon sets out a number of positive impacts in its application for which it has not proposed any measures to actually secure delivery of those claimed benefits. Without any clear plan for how such benefits will be delivered, the IACC submits that considerable caution must be applied in accepting that these benefits will be realised. Horizon also relies on mitigation it will not be responsible for bringing forward, as an example, Horizon claim that house-builders will increase delivery of new homes in response to increased demand.

2.2.6 In this report, the IACC has noted opportunities for negative impacts to be minimised or avoided through the application of proactive measures and neutral impacts to be rendered positive. The IACC has also identified measures which are required to secure the delivery of claimed benefits and noted opportunities for the significance of positive impacts to be increased.

2.3 Securing of mitigation

2.3.1 The planning balance of the decision on the DCO will also include consideration of the adequacy of mitigation proposals in determining the significance of the overall impacts. In order for the IACC to support the giving of weight to proposed mitigation it must be secured in such a way that the IACC can have certainty it will be delivered.

2.3.2 Where mitigation is to be released in response to monitoring at trigger points or thresholds which have not been identified and agreed, and whose suitability therefore cannot be considered, the IACC does not regard this as appropriate or as secured mitigation. Where delivery of that mitigation is contingent on future actions and, in the case of contingency funding, at others' discretion, the IACC is of the view that the mitigation cannot be relied upon and cannot, therefore, be given any weight.

2.3.3 Horizon's application advises that the Code of Construction Practice (CoCP) and sub-CoCPs "*contain sufficient detail to demonstrate that the mitigation described in the Environmental Statement will be secured*"¹⁴. The IACC does not agree and notes that the CoCPs are high level, general and lack the detail on how proposed controls and mitigation will be delivered. Greater clarity and detail is required for the IACC to properly assess its adequacy.

2.4 Contingency funding approach

2.4.1 The IACC has a number of objections to the contingency funding approach which are set out in detail in its written representation.

2.4.2 There has been some confusion in the terminology for contingency funding adopted by Horizon. Originally a fund to address unforeseen and unquantifiable

¹⁴ Wylfa Newydd Code of Construction Practice (doc 8.6), Examination Library reference APP-414 at 2.3.3

impacts was proposed and called the Community Resilience Fund. The draft s106 provided by Horizon in late October 2018 now proposes a Community Fund and a number of contingency funds under the headings of Tourism, Education, Accommodation and Transport.

2.4.3 The Community Fund as proposed by the S106 is to be open to applications for funding by eligible bodies (the scope of who is eligible has not yet been agreed) for the purpose of mitigating any intangible and residual impacts of Wylfa Newydd. The value of this Fund and criteria have not yet been agreed. It is unknown at this time what measures this Fund will support, when and on what conditions.

2.4.4 The IACC notes that the Tourism, Education, Accommodation and Transport contingency funds are all to be controlled by the WNMPOP in accordance with the general process set out in the CoCP¹⁵. This process involves sub-groups of the WNMPOP considering monitoring and making recommendations on as yet unidentified mitigation measures to be considered by the WNMPOP who can determine what, and if any measures are to be undertaken and how much funding is released. Under the arrangements for release of this funding there is accordingly no certainty that any measure will be implemented, the level of funding available for that measure, the timing of any action or even who will be able to access such funding.

2.5 Engagement with Horizon post DCO Submission

2.5.1 Following the acceptance of the DCO on the 28th June 2018, the IACC had a Statement of Common Ground workshop with Horizon on the 24th July 2018. In this workshop, the IACC provided an overview to Horizon of its position in relation to each theme / site.

2.5.2 Following this, (and as raised in the DCO Issue Specific Hearing on the 24th October 2018), the IACC sent Horizon 12 separate letters during September / October 2018 on a wide range of thematic issues and sites detailing the IACC's position on each issue (see Annex 1F – 1Q).

2.5.3 The IACC are yet to receive a response to these letters. This has resulted in little progress being made on the SOCG.

2.6 Collaboration with Key Public Sector Partners

2.6.1 Through the Energy Island Programme (referenced in 3.2 above), the IACC has been collaboratively engaging with public sector partners on Wylfa Newydd for almost 10 years. The IACC meets separately with Natural Resources Wales (NRW) on a monthly basis to discuss Wylfa Newydd matters. This ensures that we are fully aware of each other's positions at each stage of the DCO process.

2.6.2 More recently Team Wales has been established (instigated, coordinated and led by the IACC in partnership with the Welsh Government), to coordinate the

¹⁵ Ibid at 3.2.6

activities of Wales's public sector organisations in relation to the statutory DCO process for Wylfa Newydd. With membership including North Wales Police, Gwynedd & Conwy Councils, the Betsi Cadwaladr University Health Board, the Welsh Ambulance Service, North Wales Fire and Rescue Service and Public Health Wales, Team Wales is a forum to share information and positions to try and establish a consistent perspective. The IACC's approach to this LIR has also, therefore, been informed by the collaborative arrangements it has with its public sector partners.

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