

Wylfa Newydd DCO – EN010007

North Wales Wildlife Trust – interested party 20011639

Response to Examining Authority’s written question and requests for information (EXQ1, issued 06 November 2018)

Ref:	Question / Response
Q2.0.21	<p>Do NRW, NWWT and RSPB agree that the creation and management of species - rich grassland with a close sward and coastal heath/grassland mosaic as described in Chapter 8.16 [APP-424] paras 6.5.7 and 6.5.12 and the management of Mound A as described in 5.4.12 would be sufficient for providing optimal foraging for Chough?</p> <p>NWWT agree with the joint response provided by the RSPB on this matter. NWWT provide additional commentary in the NWWT’s written representation ‘Biodiversity – Tre’r Gof SSSI and the Temporary Site Campus’.</p>
Q2.0.22	<p>Do NRW, NWWT and RSPB agree that the mitigation described in the MPSSSCoCP 8.3.3 would be sufficient to protect Chough nesting sites from construction noise?</p> <p>NWWT agree with the joint response provided by the RSPB on this matter and the cross referencing to the eNGO written representation.</p>
Q2.0.38	<p>In its RR [RR-084] RSPB refers to a joint Ecological Options paper which sets out a series of recommendations for Natura 2000 sites. Can RSPB provide a copy of the paper?</p> <p>The joint paper was funded by National Trust. It has been supplied by the RSPB as requested.</p> <p>NWWT agree with the explanation provided by the RSPB as to the status of the paper and the cross referencing to the eNGOs’ written representation at paragraph 3.236 <i>et sequel</i>.</p>
Q2.0.39	<p>In its RR RSPB is concerned that the measures chosen to protect the Tern colony are deficient. What measures do the RSPB/NT/NWWT suggest that have not been committed to by the Applicant?</p> <p>NWWT agree with the joint response provided by the RSPB on this matter and cross referencing to the eNGOs written representation.</p>
Q2.0.40	<p>In its RR [RR-053] NT states that it is concerned about the lack of detail in relation to environmental monitoring. Can NT elaborate on these concerns?</p> <p>NWWT agree with the response provided by the National Trust on this matter. The response to this question should be read in conjunction with National Trust’s response to Q4.0.113 in relation to the Mitigation Route Map and the eNGOs’ commentary at Chapter 6 of their written representation.</p>

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Q2.0.56	<p>3 (4) attempts to limit the extent to which a tailpiece (or other drafting) might permit changes to the approved scheme to only those minor or immaterial changes which have been subject to EIA.</p> <p>This question was asked and discussed at the opening Issue Specific Hearing 24th October. The question is directed to the Applicant, but NWWT indicated orally that we have specific concerns relating to how the dDCO is drafted and how biodiversity mitigation measures are secured either by Requirements and/or through other controlling documents (eg the Mitigation Route Map APP-422 and the CoCPs Wylfa CoCP APP-414, Main Power Station CoCP APP-415 and the Marine CoCP APP-416.)</p> <p>NWWT indicated at the ISH that they intended to expand on this matter in their written representation to be submitted at deadline 2. We draw the Examiners' attention to Chapter 6 of the eNGOs' representation 'Biodiversity – Cemlyn Nature Reserve', which provides a brief initial commentary. Chapter 6 is not considered to be NWWT's final position on this matter, as it is anticipated that this theme ('tailpieces' and flexibility) will be the subject of further discussions during the Examination.</p>
Q5.0.2	<p>In paras 4.3.1 and 4.3.2 of its RR [RR-088] NRW, and RSPB in its RR [RR-084] consider that adverse effects on the Anglesey SPA cannot be ruled out due to noise, vibration and visual disturbance. Can NRW and RSPB explain why?</p> <p>NWWT agree with the joint response provided by the RSPB on this matter and the cross referencing to the eNGO written representation.</p>
Q5.0.3	<p>What is NRW and RSPB's views on the effectiveness of the monitoring proposals described in paragraphs 10.3.43 – 10.3.53 of the Shadow HRA [APP-050]?</p> <p>NWWT agree with the joint response provided by the RSPB on this matter and the cross referencing to the eNGO written representation.</p>
Q5.0.11	<p>Can NRW and RSPB confirm that they agree that the seabird survey described in the Seabird Baseline Review [APP-225] and the Shadow HRA [APP-050] is adequate for the purposes of assessing effects on European sites?</p> <p>NWWT agree with the joint response provided by the RSPB on this matter and the cross referencing to the eNGO written representation.</p>
Q5.0.16	<p>Are NRW, RSPB and NWWT content with the Applicant's conclusion regarding likely significant effects on European sites as expressed in the Shadow HRA and the Shadow HRA Addendum [AS-0101]? If not, why not?</p> <p>NWWT agree with the joint response provided by the RSPB on this matter and the cross referencing to the eNGO written representation.</p>
Q5.0.32	<p>Do NRW or RSPB have any concerns about effects on the Anglesey Terns SPA for impacts resulting from change or loss of foraging habitat, changes in marine water quality or impingement/entrainment of prey species during construction and operation?</p>

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	NWWT agree with the response provided by the RSPB on this matter and the cross referencing to the eNGO written representation.
Q5.0.39	<p>Can RSPB, NWWT, NT and NRW confirm if delivery of the ‘resilience measures’ proposed in section 11.3 of the Shadow HRA would be sufficient to allay their concerns about the effects on the Anglesey Terns SPA? If not, why not and what additional measures would be required?</p> <p>NWWT agree with the joint response provided by the RSPB on this matter and the cross referencing to the eNGO written representation.</p>
Q5.0.44	<p>Can NRW and NWWT confirm if, in their view, the measures proposed in the Workforce Management Strategy [APP-413] would be sufficient to avoid adverse effects on integrity from trampling and increased visitor use? If not, why not?</p> <p>NWWT are of the opinion that the measures proposed in the Workforce Management Strategy [APP-413] are not sufficient.</p> <p>NWWT do not believe that the baseline analysis provides Horizon with sufficient understanding of this impact pathway or its consequences.</p> <p>As a result, it is considered that Horizon have provided a disproportionately small response to the significant matter of recreational disturbance as a cumulative impact. In NWWT’s view (as well as National Trust and the RSPB), the WMS in isolation from any other measures will not be effective. It will be almost impossible to monitor or enforce effectively and will be reliant on the vigilance of external third parties for reporting and dealing with issues as they arise.</p> <p>In relation to visitor usage (worker or non-worker), NWWT, and the other eNGOs, do not consider that measures undertaken at Cemlyn Nature Reserve in isolation will be sufficient to control any adverse effect. In the absence of a strategic approach to the consideration of accessible natural greenspace* it is highly probable that measures to be implemented elsewhere within the WNDA or the Temporary Site Campus (TSC) will increase the likelihood of adverse effects at the SPA/SAC.</p> <p>This matter is discussed fully in the eNGOs’ biodiversity evidence: -</p> <ul style="list-style-type: none"> - Non-worker visitors from paragraph 3.157 - Site workers from paragraph 3.173 <p>There is no securing mechanism within the draft DCO (APP-029), which requires agreement from IACC as to how the WFM Strategy will be translated into a Workers Code of Conduct.</p> <p>* The eNGOs have defined other accessible greenspace within the vicinity of the WNDA/TSC to include Wylfa Head, Trwyn Pencarreg (National Trust estate) and the Coastal Footpath, which all also have biodiversity sensitivities to recreational pressures.</p>
Q14.0.10	<p>Do the Design and Access Statement [APP-409]; the parameter plan identified in Schedule 2, Part 4 and the Requirements in relation to Site Campus Works Work Number 3, in Schedule 3 of the dDCO [APP-029], including the maximum dimensions</p>

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	<p data-bbox="339 219 1331 286">shown in WN20, meet the planning policy objectives in respect of achieving high quality, sustainable development for the Site Campus; with reference to:</p> <p data-bbox="339 309 1382 645">This ExA question is asked of IACC, NWWT have supplied to IACC a brief note of issues that we felt were of relevance to this matter in relation to biodiversity (the environment being one of the 3 pillars of sustainable development). It is hoped that this may have been useful and to some extent reflected in the Council's response to this question. Additionally, we wish to draw the Examining Body's attention to the NWWT written representation on 'Biodiversity – Tre'r Gof SSSI and the Temporary Site Campus' which in Chapter 3 discusses the construction impacts and the design of the scheme.</p>