

**HORIZON**

NUCLEAR POWER



# Wylfa Newydd Project

## Statement of Common Ground between Horizon Nuclear Power Wylfa Limited and North Wales Wildlife Trust (NWWT)

PINS Reference Number: EN010007

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19 February 2019

Revision 2.0

Examination Deadline 6

Regulation Number: 5(2)(q)

Planning Act 2008

Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

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# 1 Introduction

## 1.1 Status of this SoCG

- 1.1.1 This is a jointly agreed statement between Horizon and North Wales Wildlife Trust. It is an accurate reflection of agreed, disagreed and ongoing matters at Deadline 6.
- 1.1.2 It is noted that where this SoCG relies on documents which are due to be submitted at later deadlines in the examination, this is noted where relevant and may change the status of issues recorded in this version of the SoCG

## 1.2 Purpose of this document

- 1.2.1 This SoCG is a final agreed document that has been prepared by Horizon and NWWT. It has been prepared in accordance with the guidance published by the Department of Communities and Local Government (hereafter referred to as 'DCLG Guidance')<sup>1</sup> and example SoCG documents provided on the Planning Inspectorate's website<sup>2</sup>.
- 1.2.2 The purpose of this SoCG is to set out agreed factual information about the application for development consent made by Horizon for the construction and operation of a new nuclear power station at the Wylfa Newydd Development Area (hereafter referred to as 'WNDA') together with on and off-site associated development (hereafter referred to as 'the Wylfa Newydd DCO Project').
- 1.2.3 Paragraph 58 of the DCLG Guidance states:  
*"A statement of common ground is a written statement prepared jointly by the applicant and another party or parties, setting out any matters on which they agree. As well as identifying matters which are not in real dispute, it is also useful if a statement identifies those areas where agreement has not been reached. The statement should include references to show where those matters are dealt with in the written representations or other documentary evidence"*
- 1.2.4 The aim of this SoCG is to therefore provide a clear position of the state and extent of discussions and agreement between Horizon and North Wales Wildlife Trust on matters relating to the Wylfa Newydd Project as at 19<sup>th</sup> February 2019.
- 1.2.5 The first draft of the SoCG was provided to North Wales Wildlife Trust by Horizon on 17<sup>th</sup> July 2017 for review and comment. This SoCG has evolved through a series of iterative drafts.
- 1.2.6 This final SoCG has been submitted to the Examining Authority in relation to the application by Horizon under section 37 of the Planning Act 2008 (the Act)

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<sup>1</sup> Planning Act 2008: Guidance for the examination of applications for development consent (March 2015) paragraphs 58 – 65 [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/418015/examinations\\_guidance-final\\_for\\_publication.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/418015/examinations_guidance-final_for_publication.pdf)

<sup>2</sup> <https://infrastructure.planninginspectorate.gov.uk/application-process/example-documents/>

for an order granting development consent for the construction of the Wylfa Newydd DCO Project.

## 1.3 Description of development

### *The Wylfa Newydd Project*

1.3.1 The Wylfa Newydd Project includes:

#### *The Enabling Works*

1.3.2 The Enabling Works comprise the Site Preparation and Clearance Proposals (SPC Proposals) and the A5025 On-line Highway Improvements.

1.3.3 Horizon has submitted applications for planning permission for the Enabling Works under the Town and Country Planning Act 1990 to the Isle of Anglesey County Council (IACC) as local planning authority. The On-line Highway Improvements were granted planning permission on 13th July 2018 (ref: 27C106E/FR/ECON). The planning authority resolved to grant the SPC application subject to the signing of a legal agreement on the 5th September 2018. The Welsh Government wrote to the IACC on 13 December 2018 directing that the SPC application should be determined by the Welsh Ministers (referred to as a call-in). Horizon has now written to IACC and Welsh Government to confirm that it is withdrawing the SPC application and that all works included within the SPC application have also been applied for as part of the DCO application.

1.3.4 The SPC Proposals will now be determined as part of the DCO application. The A5025 On-line Highway Improvements are not part of the DCO application.

#### *The Wylfa Newydd DCO Project*

1.3.5 The Wylfa Newydd DCO Project comprises those parts of the Wylfa Newydd Project which are to be consented by a DCO, namely:

### **The Nationally Significant Infrastructure Project (NSIP)**

- **Power Station:** the proposed new nuclear power station, including two UK Advanced Boiling Water Reactors, the Cooling Water System, supporting facilities, buildings, plant and structures, radioactive waste and spent fuel storage buildings and the Grid Connection;
- **Other on-site development:** including landscape works and planting, drainage, surface water management systems, public access works including temporary and permanent closures and diversions of public rights of way, new Power Station Access Road and internal site roads, car parking, construction compounds and temporary parking areas, laydown areas, working areas and temporary works and structures, temporary construction viewing area, diversion of utilities, perimeter and construction fencing, and electricity connections;

- **Marine works comprising:**
  - Permanent Marine Works: the Cooling Water System, the Marine Off-loading Facility, breakwater structures, shore protection works, surface water drainage outfalls, waste water effluent outfall (and associated drainage of surface water and waste water effluent to the sea), fish recovery and return system, fish deterrent system, navigation aids and Dredging;
  - Temporary Marine Works: temporary cofferdams, a temporary access ramp, temporary navigation aids, temporary outfalls and a temporary barge berth;
- **Off-site Power Station Facilities:** comprising the Alternative Emergency Control Centre (AECC), Environmental Survey Laboratory (ESL) and a Mobile Emergency Equipment Garage (MEEG); and

### Associated Development

- the Site Campus within the Wylfa Newydd Development Area;
- temporary Park and Ride facility at Dalar Hir for construction workers (Park and Ride);
- temporary Logistics Centre at Parc Cybi (Logistics Centre);
- the A5025 Off-line Highway Improvements;
- wetland habitat creation and enhancement works as compensation for any potential impacts on the Tre'r Gof Site of Special Scientific Interest (SSSI) at the following sites:
  - Tŷ Du;
  - Cors Gwawr;
  - Cae Canol-dydd

1.3.6 The Power Station will be operational for approximately 60 years after which it will be decommissioned. The buildings will be removed from the site and all spent fuel and radioactive waste managed. The end state of the site will be agreed with the regulators.

### Licensable Marine Activities

- 1.3.7 The Licensable Marine Activities comprise the Marine Works and the Deep Disposal (i.e. the disposal of material from dredging at the Disposal Site at Holyhead North). The Licensable Marine Activities will be consented under a Marine Licence, however the Marine Works would also be consented under the DCO.
- 1.3.8 A more detailed description of development is contained at Chapter 4 of the Planning Statement (APP-406).

## 2 Overview of Engagement

2.1.1 The preparation of this SoCG has been informed by a programme of discussions between Horizon and North Wales Wildlife Trust. Horizon met with North Wales Wildlife Trust to discuss and document common ground on the following dates:

**Table 2-1 SOCG meetings held between Horizon and North Wales Wildlife Trust**

Meeting Date	Attendees	Purpose of Meeting
11 <sup>th</sup> July 2017	Horizon North Wales Wildlife Trust	Initial meeting to discuss approach to SoCG
4 <sup>th</sup> October 2017	Horizon North Wales Wildlife Trust	Update meeting to discuss the draft DCO documents and how they relate to the SoCG
16 <sup>th</sup> July 2018	Horizon North Wales Wildlife Trust	Meeting to discuss the areas of concern to be included in the SOCG document.
2 <sup>nd</sup> October 2018	Horizon, National Trust, RSPB, NWWT, IACC, NRW	Meeting to explore any area of common ground relating to the Natura 2000 sites.
10 <sup>th</sup> October 2018	Horizon, National Trust, RSPB, NWWT, IACC, NRW	Meeting to explore any area of common ground relating to Wylfa Head, Tre'r Gof SSSI, and the Site Campus.
11 <sup>th</sup> October 2018	Horizon, National Trust, RSPB, NWWT, IACC, NRW	Meeting to explore any area of common ground relating to marine and terrestrial ecological issues.
28 <sup>th</sup> January 2019	Horizon, RSPB, National Trust, North Wales Wildlife Trust	Meeting to finalise positions for the final SOCG.

2.1.2 In addition to these discussions, Horizon has engaged with North Wales Wildlife Trust since June 2017 through a number of technical meetings to address specific project issues as they have arisen. A list of these meetings is provided below. All of these discussions have informed this SoCG.



**Table 2-2 Technical meetings held between Horizon and North Wales Wildlife Trust**

<b>Meeting Date</b>	<b>Attendees</b>	<b>Purpose of Meeting</b>
21 <sup>st</sup> June 2017 3 <sup>rd</sup> October 2017	Horizon, IACC, NRW, NWWT, National Trust, RSPB, Gwynedd Archaeology Planning Service, Cadw, Red Squirrels Trust	Wylfa Newydd Natural & Historic Environment Forum (WNNHEF). The forum is intended as a means to obtain stakeholder input into the emerging LHMS.
23 <sup>rd</sup> October 2017	Horizon, RSPB, NWWT	Visit of the ecological receptor sites and discussion of the parameter plans approach to securing the DCO.
5 <sup>th</sup> December 2017	Horizon, NRW, IACC, RSPB, National Trust, NWWT, Seawatch Foundation	Discussion of the issues relating to the marine environment.
12 <sup>th</sup> December 2017	Horizon, NRW, IACC, RSPB, National Trust, NWWT	Discussion of the issues relating to terrestrial and freshwater ecology.
16 <sup>th</sup> January 2018	Horizon, NRW, IACC, National Trust, NWWT	Discussion of the issues relating to Cemlyn Lagoon.
18 <sup>th</sup> February 2018	Horizon, IACC, National Trust, NWWT, RSPB	Discussion of the interim condition should the SPC planning application be approved.
6 <sup>th</sup> March 2018	Horizon, NRW, IACC, National Trust, NWWT, RSPB	Discussion on the draft Landscape and Habitat Management Plan document.
28 <sup>th</sup> June 2018	Horizon, National Trust, NWWT, RSPB	Meeting to update the NGOs on work undertaken to identify possible compensation site for terns should they be required.

## 2.2 Consultation with North Wales Wildlife Trust

- 2.2.1 Horizon has undertaken engagement with the North Wales Wildlife Trust throughout the pre-application period.
- 2.2.2 Full details are provided in the Consultation Report (APP-037).
- 2.2.3 Horizon has an overarching engagement framework in place, principally to support engagement with IACC, Welsh Government and NRW. Although this has not been formally agreed with North Wales Wildlife Trust, Officers have attended relevant meetings within this framework, as illustrated in Figure 2-1 below, principally at the Level 4, technical level.

**Figure 2-1 Wylfa Newydd Engagement Framework**



- 2.2.4 Following Horizon's Stage Two Pre-Application Consultation, Horizon set up a series of Level 4 technical meetings on specific issues.
- 2.2.5 DCLG Guidance recognises that the topics on which agreement might be reached in any particular instance (or those areas where agreement might not be reached) will depend on the matters at issue and the circumstances of the case.
- 2.2.6 Horizon shared with North Wales Wildlife Trust, amongst other statutory consultees, the draft application documents to support the DCO application that they requested in September and October 2017. This followed detailed comments made by the North Wales Wildlife Trust in March 2016 on the Environmental Impact Assessment Progress Report in advance of PAC2. Specifically, North Wales Wildlife Trust were provided with copies of the following documents:

- Environmental Statement chapters:
  - A1 – Introduction to the project and approach to EIA
  - A2 – Project overview and introduction to the development
  - B8 – Introduction to the assessments – surface water and groundwater
  - B9 – Introduction to the assessments – terrestrial and freshwater ecology
  - B12 – Introduction to the assessments – coastal processes and geomorphology
  - B13 – Introduction to the assessments – Marine environment
  - C4 – Project wide effects – air quality effects of traffic
  - C7 – Combined topic effects of traffic
  - D1 – Power Station Main Site – Proposed Development
  - D5 – Power Station Main Site – air quality
  - D6 – Power Station Main Site – noise and vibration
  - D7 – Power Station Main Site – soils and geology
  - D8 – Power Station Main Site – surface water and groundwater
  - D9 – Power Station Main Site – terrestrial and freshwater ecology
  - D12 – Power Station Main Site – coastal processes and geomorphology
  - D13 – Power Station Main Site – marine environment
  - D16 – Power Station Main Site – combined topic effects
  - E1 – Offsite Power Station Facilities – Proposed Development
  - F1 – Park and Ride – Proposed Development
  - G1 – A5025 Offline Highways Improvements – Proposed Development
  - H1 – Logistics Centre – Proposed Development
- Relevant Environmental Statement Appendices
- Shadow Habitats Regulations Assessment
- Construction Method Statement
- Code of Construction Practice
- Code of Operational Practice
- Power Station Main Site sub-CoCP
- Marine Works sub-CoCP
- Site Selection Report Volume 2 main site layout
- Site Selection Report Volume 4 temporary workers accommodation
- Landscape and Habitat Management Strategy

2.2.7 North Wales Wildlife Trust were invited to provide comments on the draft documents. Due to time constraints of the North Wales Wildlife Trust staff and volunteers and the changing nature of some of the on-going studies, North Wales Wildlife Trust were only able to provide summary comments on new elements of the proposal which varied from the detailed response provided in the Environmental Impact Assessment Progress Report Review in March 2016. These documents also served to develop, and inform on-going discussions associated with this SoCG.

### 3 Current Position

- 3.1.1 The following schedule sets out the position of North Wales Wildlife Trust alongside Horizon's position following issue and review of the DCO application.
- 3.1.2 It sets out matters by topic area and provides an indication of whether the issue is agreed (green), not agreed (red) or ongoing (amber).
- 3.1.3 For ongoing issues, the intention is to continue dialogue on the specific issue to try to reach agreement.
- 3.1.4 North Wales Wildlife Trust do not wish to raise objections in relation to any other areas of the Project.
- 3.1.5 This final SOCG is submitted at Deadline 6 and reflects the positions of the North Wales Wildlife Trust and Horizon at the point of submission. It is acknowledged that further material may be submitted to the Examination after Deadline 6 which could alter the positions stated in this SOCG. This includes the draft s.106 agreement which includes specific provisions for the North Wales Wildlife Trust and matters that they consider of relevance to the cross-cutting issues on which they have made representations (see issue NWWT14 for positions on the draft s.106 agreement).

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**Table 3-1 Statement of Common Ground between the North Wales Wildlife Trust and Horizon**

Topic	Issue	SoCG ID	Document Reference/Signpost/Route map	North Wales Wildlife Trust Position	Horizon Position	RAGs	Further actions required to progress discussion on the issue
Cemlyn Nature Reserve – Anglesey Terns SPA, tern breeding colony and SSSI	Disturbance to terns	NWWT1	<p>APP-050 / App-051 5.2 Shadow Habitats Regulations Assessment Report</p> <p>APP-132 6.4.13 ES Volume D – WNDA Development D13 – The Marine Environment</p> <p>APP-225 6.4.89 ES Volume D – WNDA Development App D13.07 – Seabird Baseline Review</p> <p>REP2-031 Deadline 2 Submission - 8.6 Wylfa Newydd Code of Construction Practice</p> <p>REP2-032 Deadline 2 Submission - 8.7 Main Power Station Site Sub-Code of Construction Practice</p> <p>REP2-033 Deadline 2 Submission - 8.8 Marine Works Sub-Code of Construction Practice</p> <p>REP2-037 Deadline 2 - 8.13 Wylfa Newydd Code of Operational Practice</p> <p>APP-422 8.14 Mitigation Route Map</p> <p>REP2-039 Deadline 2 Submission - 8.16 Landscape and Habitat Management Strategy (Rev 2.0)</p> <p>REP3-026Deadline 3 Submission - Horizon's Response to Written Representation - eNGO Biodiversity Cemlyn Nature Reserve</p>	<p>The assessment of the potential effects to the tern colony during construction do not prove 'beyond reasonable scientific doubt that there will be no adverse effect on integrity which is a key test of the Habitats Regulation Assessment. Combined effect of noise, visual stimuli, disturbance from workers / visitors and modification to predator population dynamics from the WNDA could significantly impact the integrity of the site leading to a decline in its current condition and the population stats of the terns (common, Arctic &amp; Sandwich) within and beyond the SPA. Full details of NWWT's position in relation to the Horizon's methods to mitigate these construction effects is provided in the post hearing note/oral submission [REP4-044 also included in National Trust REP4-038].</p> <p>In relation to predator dynamics the eNGO position was represented in the WR [REP2-348] and NWWT note the ExA Q2.5.9 on this matter to NRW.North Wales Wildlife Trust consider that on-site measures (within the SPA) to reduce the potential impacts on the tern colony are not clearly defined in the DCO and their delivery is uncertain. NWWT have not seen a post D3 [REP3-042] draft s.106 relating to the visitor centre's early delivery and are concerned about any interim period arrangements for visitors between Horizon submitting, receiving TCPA permission and the final completion of the Visitor Centre.</p> <p>NWWT have indicated that whilst welcoming the Tern Warden Funding this should encompass the whole of the costs (salary and adjustments to on-site living accommodation if necessary) and contain a contingency for any construction over-run. From the recent SoCG discussions (28.1.19) this appears not to be the case.</p> <p>North Wales Wildlife Trust are concerned that mitigation measures alone will not be sufficient to conclude no adverse effect on integrity (AEOI) of the Anglesey Terns SPA from the combined impacts during construction and operation. Therefore, the case for no alternative solutions and reasons of overriding public interest, should be considered along with a proposed package of</p>	<p>The Environmental Statement and Shadow HRA have considered in detail the effects of the various construction and operational activities associated with the three tern species that nest on the islands in Cemlyn Lagoon. A range of mitigation measures have been proposed to ensure that the integrity of the Anglesey terns SPA is maintained and these are secured in the in the Wylfa Newydd CoCP (REP2-031), Main Power Station Site sub-CoCP (REP2-032) and Marine Works sub-CoCP (REP2-033) or are an integral part of the proposals. The Shadow HRA concludes that disturbance from noise and visual stimuli (including workers / visitors and predators in combination) will not result in the abandonment or a reduction in breeding success of the Cemlyn Lagoon nesting site beyond reasonable scientific doubt and based on the best evidence available. Mitigation is proposed to provide confidence that noise will not impact the nesting terns.</p> <p>In August 2018, the IACC considered the risk of increased predation within its assessment of the SPC works under The Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations). IACC concluded that any changes to predation risk associated with the SPC works are likely to be imperceptible and that significant effects, as a result of the SPC works, would not occur. Although this conclusion is specific to the SPC works - which do not involve soil stripping - IACC's justifications for this conclusion are equally relevant to the Project as a whole. Further detail on this position is provided in Horizon's response (<a href="#">REP3-026</a>) to the eNGOs' written representation on Cemlyn Lagoon.</p> <p>Regarding increased footfall from construction workers, those residing within the Site Campus will receive information on the sensitivity and legal protection afforded to Cemlyn Bay and the species it supports. Access to the area from the Site Campus will be a walk of over 6km (a round trip of more than 12km), and entertainment facilities will be provided on-site to reduce the need to seek off-site entertainment. These provisions are secured as part of the Workforce Management Strategy (Section 2.3, APP-413).</p> <p>The Landscape and Habitat Management Strategy (REP2-039) sets out the principles for managing public access during construction. The principle which addresses the management of visitors is as follows:</p> <p><i>Suitable arrangements to enable viewing of the construction activity should be made. Initially, this may comprise a temporary viewing platform available around 6 months after the start of construction, dependent on availability of safe access and parking capacity. This facility may evolve through the construction period dependent on the positioning of activities while moving through the different phases.</i></p> <p>In addition, the draft s.106 agreement includes a provision for a Tourism Action Plan, and a commitment to deliver the visitors' centre. The Deadline 5 draft s.106 agreement will commit Horizon to apply for planning permission for a Visitor Centre within three months of Implementation of the Wylfa Newydd DCO Project or as soon as reasonably possible thereafter, and to implement such planning permission in order to target opening of the Visitor Centre within two years from the grant of permission and further information on the Visitor Centre will be submitted at Deadline 5. .</p> <p>Horizon does not agree that mitigation measure for impacts to terns are not clearly defined. Mitigation measures considered necessary by Horizon are identified in the Mitigation Route Map (APP-422) which sets out which document</p>	Not agreed	No further actions identified at this time.

Topic	Issue	SoCG ID	Document Reference/Signpost/Route map	North Wales Wildlife Trust Position	Horizon Position	RAGs	Further actions required to progress discussion on the issue
				compensation measures that should be presented to the Examining Authority.	in the DCO the mitigation measure has been identified as needed, and which control document the mitigation measure will be secured by. For construction impacts, mitigation measures are set out in the Wylfa Newydd CoCP (REP2-031), Main Power Station Site sub-CoCP (REP2-032) and Marine Works sub-CoCP (REP2-033). During operation, mitigation measures are secured in the Landscape and Habitat Management Strategy (REP2-039) and the Wylfa Newydd Code of Operational Practice (REP2-037). Horizon propose to include a contribution in the draft s.106 agreement for funding of a tern warden during breeding seasons for the duration of the main works construction period.  The Shadow HRA concludes that there will not be an adverse effect on integrity to the Anglesey Terns SPA. Consequently Stages 3 and 4 of the HRA process do not need to be progressed, nor compensation provided.		
Cemlyn Nature Reserve – Cemlyn Bay SAC, saline lagoon and shingle ridge, and SSSI	Long term viability of the shingle ridge.	NWWT2	APP-131 6.4.12 ES Volume D – WNDA, D12 – Power Station Site – Coastal Processes and Coastal Geomorphology, APP-216 6.4.80 ES Volume D WNDA Development App, D12.01 – Coastal Geomorphology Baseline for the Wylfa Newydd Project – 2014, APP- 218 6.4.82 ES Volume WNDA Development App D12.03 – Wylfa Newydd Main Site - Final Wave Modelling Report REP2-007 Deadline 2 Submission - Supplementary Information on Coastal Processes to Support Wylfa Newydd EIA and Shadow HRA	The North Wales Wildlife Trust do not agree that sufficient information has been provided to conclude that there will be no adverse effects to the long term viability of the Esgair Gemlyn shingle ridge and consequently it cannot be concluded beyond reasonable scientific doubt there will be no adverse effect on integrity (AEOI) of Cemlyn Bay SAC.  The North Wales Wildlife Trust considers that mitigation measures alone will not be sufficient to conclude no AEOI of the Anglesey Terns SPA as a result of potential changes to coastal processes (in addition to other identified impacts during construction and operation) and therefore the case of no alternative solutions and reasons of overriding public interest together with a proposed package of compensation measures should be presented to the Examining Authority.  North Wales Wildlife Trust will defer to the evidence of the National Trust’s specialist witness.  Despite the advice as presented on the adoption of the EU’s Precautionary Principle [addendum to REP4-044, also included in National Trust REP4-038], which specifically identifies inclusion of significant stakeholders in the formulation of measures, Horizon have not chosen to include the National Trust as landowner of Esgair Gemlyn, NWWT as tenant and manager of Cemlyn Nature Reserve in these discussions. Nor have Horizon availed themselves of input from National Trust’s experienced specialist advisor on this matter.	Since the submission of the DCO application, Horizon has undertaken further modelling assessments which couple the model for the worst case 99%ile NE wave scenario with the coastal processes model to identify any impacts to Esgair Gemlyn. The additional modelling information was sent to the North Wales Wildlife Trust on 5 <sup>th</sup> October 2018 and was discussed at a meeting on the 11 <sup>th</sup> October 2018. The additional modelling information has been submitted to the Examining Authority at Deadline 2 (REP2-007).  The results show that the bed shear stresses predicted to arise due to the Marine Works would not change sufficiently to cause an increase in sediment mobilisation that could have an adverse impact on Esgair Gemlyn. Moreover, there is not predicted to be a significant change in the energetics of the water body within / adjacent to Cemlyn lagoon. Consequently, the functioning of the lagoon and islands that terns use for breeding would not be adversely affected.  Although no significant changes are predicted to Esgair Gemlyn as a result of the Marine Works, to further minimise the residual risk Horizon is proposing to monitor the shingle ridge and develop an adaptive management plan to deal with any changes should they arise. These proposals are currently being consulted on with NRW and will be provided into the Examination at Deadline 5.	Ongoing	Horizon to consult with NRW on the monitoring and adaptive management proposals for Esgair Gemlyn. Horizon will consult with the eNGOs on the proposals once agreement has been reached with NRW.
	Changes to the chemical conditions within	NWWT3	APP-127 6.4.8 ES Volume D – WNDA Development D8 –	The North Wales Wildlife Trust do not consider that adequate consideration has been given to changes in chemical conditions within the Cemlyn Lagoon’s freshwater water	The drainage design for Mound E will ensure that surface water drainage from Mound E will be captured and treated through the use of swales, attenuation ponds, and silt busters. The treated surface water will then be pumped overland and discharged to the Afon Cafnan under a discharge permit issued by NRW	Not Agreed	No further actions identified at this time.



Topic	Issue	SoCG ID	Document Reference/Signpost/Route map	North Wales Wildlife Trust Position	Horizon Position	RAGs	Further actions required to progress discussion on the issue
	Cemlyn Lagoon.		Surface water and groundwater REP2-032 Deadline 2 Submission - 8.7 Main Power Station Site Sub-Code of Construction Practice	budget'. Insufficient information has been provided to conclude that runoff from Mound E will not reach the Nant Cemlyn and subsequently the Cemlyn Lagoon with corresponding impacts to the lagoon's water quality. The proposals to pump drainage water overland to be discharged into the Afon Cafnan are welcomed, but concerns remain over the effectiveness of the strategy as no information has been provided on the specification of plant to be used and its adequacy to cope with extreme storm events. The North Wales Wildlife Trust remains opposed to any reworking of Mound E and the flexibility sought by Horizon.	during the earthworks phase before vegetation is established on Mound E. The specification for the pumping equipment has not yet been determined but it will be adequately specified to prevent discharges of silted water to the Nant Cemlyn watercourse. The DCO application states that the overland pumping will be switched off when the slopes of Mound E are adequately vegetated to prevent elevated siltation of the discharged runoff (REP2-032). Discussions with NRW on this issue have resulted in a change in strategy so that additional baseline monitoring of the Nant Cemlyn will be undertaken to understand the seasonal fluctuations of the water course. Monitoring of the pumped discharge to Afon Cafnan will also be monitored and the pumping will only be switched off and runoff allowed to discharge to the Nant Cemlyn when the water quality threshold agreed with NRW is achieved. The Main Power Station Site sub-CoCP (REP2-032) that was submitted at Deadline 2 is being updated at Deadline 5 to secure this amendment.  By diverting runoff from Mound E to the Afon Cafnan there will be a small reduction in the amount of freshwater input to Nant Cemlyn and subsequently Cemlyn Lagoon. There will also be a small reduction in the amount of groundwater input to the lagoon. The reduction in freshwater inputs is small and the assessment has determined no significant effect (paragraphs 8.5.24 to 8.5.27 inclusive, APP-127) to the chemistry or water budget of Cemlyn Lagoon.		
Water Framework Directive	Impacts to The Skerries Coastal Waterbody (marine)	NWWT4	APP-444 8.26 Water Framework Directive Compliance Assessment APP-445 8.27 Water Framework Directive Information to Support Article 4(7) Derogation REP4-023 Deadline 4 Submission - Ecological Enhancements Mitigation Report	North Wales Wildlife Trust are concerned that the late acknowledgement of the deterioration of the Skerries Coastal Waterbody has not allowed for the consideration of alternatives or use of Best Available Technology. North Wales Wildlife Trust are concerned about impacts from hydromorphology, geomorphology and wave dynamics, the extent and loss of subtidal and intertidal habitats, and the hydrological consequences of the cooling water system.	The WFD compliance assessment concludes that there is a risk of deterioration in The Skerries Coastal water body due to the loss of marine habitat and changes to coastal morphology due to the construction of the MOLF and breakwater. The predicted loss is small, indeed it is below the generic threshold of effect under which deterioration from high morphological status to good morphological status would typically occur. However, in liaison with NRW and with reference to the normative definitions for coastal water bodies, the WFD compliance assessment concludes that there is a risk of deterioration.  Horizon have submitted further proposals at Deadline 4 for ecological enhancement and marine restoration in the Wylfa Newydd Development Area to mitigate for the loss of rocky reef habitat and reduce the assessment from significant to not significant (REP4-023). Horizon notes that NRW and the Secretary of State, as the competent authorities in respect of applications relating to the Wylfa Newydd Project, are ultimately responsible for assessing WFD compliance, including in respect of any Article 4(7) derogation.  In order to assist this process, Horizon has prepared the Water Framework Directive Compliance Assessment (APP-444) and Information to Support Article 4(7) Derogation (APP-445). Horizon continues to liaise with NRW to ensure that materials can be made available to inform the assessment to inform this work.	Ongoing	North Wales Wildlife Trust to review updated proposals for marine habitat enhancements.
	Impacts to the Ynys Môn Secondary Groundwater Body (freshwater)	NWWT5	APP-444 8.26 Water Framework Directive Compliance Assessment APP-445 8.27 Water Framework Directive Information to Support Article 4(7) Derogation APP-128 6.4.9 ES Volume D – WNDA Development D9 –	North Wales Wildlife Trust are concerned that the late acknowledgement of the deterioration of the Ynys Môn Secondary Groundwater Body has not allowed for the consideration of alternatives or application of Best Available Technology which would avoid the deterioration in quality. Specifically, North Wales Wildlife Trust are concerned about impacts to hydrologically dependent fen habitat at Tre'r Gof SSSI the inappropriate siting of the Associated Development of the Site Campus and the drainage system in this catchment.	The WFD compliance assessment concludes that there is a risk of deterioration to the Ynys Môn Secondary groundwater body. This is driven by saline intrusion and impacts on Tre'r Gof SSSI (which is termed a groundwater dependent terrestrial ecosystem or GWDTE under the WFD).  Tre'r Gof SSSI sits within a 'non-reportable' surface water body (identified as Tre'r Gof Drains in the WFD compliance assessment). It's status as a non-reportable water body means that effects are assessed with reference to the next downstream water body, which in this case is the Anglesey North coastal water body. Effects associated with the Site Campus are assessed for Tre'r Gof Drains (concluding compliance for Anglesey North) and for Ynys Môn Secondary groundwater body (concluding compliance).  Under the WFD, there is no specific requirement to compensate for deterioration of the Ynys Môn Secondary groundwater body. WFD mitigation measures must	Not agreed	No further actions identified at this time.

Topic	Issue	SoCG ID	Document Reference/Signpost/Route map	North Wales Wildlife Trust Position	Horizon Position	RAGs	Further actions required to progress discussion on the issue
			Terrestrial and Freshwater Ecology		be within the affected water body and, consequently, the proposed compensation sites at Cae Canol-dydd and Cors Gwawr do not qualify.		
Impacts from the temporary Site Campus	Impacts to species rich grassland, chough, fungi and Tre'r Gof SSSI from the Site Campus.	NWWT6	<p>APP-128 6.4.9 ES Volume D – WNDA Development D9 – Terrestrial and Freshwater Ecology</p> <p>APP-168 6.4.34 ES Volume D – WNDA Development pp D9-1 – Fungi Technical Summary Report</p> <p>APP-413 8.7 Workforce Management Strategy</p> <p>REP2-039 Deadline 2 Submission - 8.16 Landscape and Habitat Management Strategy (Rev 2.0)REP2-020 Deadline 2 Submission - 3.1 Draft Development Consent Order (Revision 3.0)</p> <p>REP3-027 Deadline 3 Submission – Horizon's Response to Written Representation – North Wales Wildlife Trust</p> <p>REP3-046 Deadline 3 Submission - Addendum to 2018 Chough Baseline Report</p>	<p>North Wales Wildlife Trust do not accept that the temporary Site Campus, as an Associated Development, needs to be located in the proposed position. The WR indicates that it is also contrary to national policy including National Planning Statement EN-1 [REP2-349 3.20 – 3.35].</p> <p>Specific concerns relate to impacts from scale, site infrastructure and foul sewer diversion on species rich semi-improved grassland, grassland fungi and chough foraging, uncontrolled recreational usage and Tre'r Gof SSSI.</p> <p>North Wales Wildlife Trust question whether there are techniques available to achieve and / or sufficient information to demonstrate that the site can be restored to its current condition in relation to 'old' soil structures, interrupted shallow groundwater flows or soil invertebrates. The matter of reinstatement of these features is not solely reliant on topsoil management as a virgin landform will be created with importation of fill, removal of surface water drainage features and infilling of service trenches [REP2-349 3.99 – 3.106 and 3.122]. Despite requests no feasibility/methodology has been forthcoming from Horizon. Additionally, the Requirement WN23 2(b) [REP2-020] on decommissioning still indicates that the TWA (Site Campus) final landform will be created in order to return the site to agricultural use, with no cross reference to the LHMS.</p> <p>Comments on Horizon's REP3-46 and the eNGOs' views on the need for continuity, quality and extent of chough foraging habitat were presented in NWWT's WR [REP 2-348 3.76 – 3.77 and 3.107]. The draft Requirement WN9 and WN11 [REP2-020] and the revised Phasing Strategy [REP4-014] clearly indicate that the LHMS will not be submitted for agreement until 12 months prior to Commission Date of Unit 2 (Y9) and therefore implementation of any scheme will occur in the next growing season post agreement – i.e. Y10 at the earliest, with all operational mounds being identified as being delivered at the end of reinstatement. This will not address the mitigation needs for chough during the construction phase. Comments supplied by the eNGO's WR [REP2-348</p>	<p>Horizon have undertaken fungi surveys in the fields where the Site Campus will be located. The surveys have identified hotspots in the field but these are along the coastal strip, outside of the perimeter fence, and will not be disturbed by the construction, operation, or decommissioning of the Site Campus.</p> <p>Horizon acknowledges that there is a potential impact to chough from the loss of foraging habitat and are currently implementing a management regime on Wylfa Head and the adjoining coastal strip which is sympathetic to chough foraging as mitigation. The management regime has been informed by advice provided by the RSPB. Horizon has shared with the North Wales Wildlife Trust the draft management scheme, which is being developed in accordance with the principles set out in the LHMS (REP2-039),. Requirement WN11 requires Horizon to develop detailed plans that set out the proposed management measures for defined areas which includes Wylfa Head. Horizon welcome the organisation's comments on this document.</p> <p>Chough surveys have been undertaken over the 2018 breeding season and the initial results have been presented to the North Wales Wildlife Trust at a meeting on the 10<sup>th</sup> October 2018 and the report subsequently shared with the North Wales Wildlife Trust and submitted into the DCO Examination (REP3-046). The results showed that the nesting pair is made up of different birds to previous years but has foraged primarily (71% of foraging time) on Wylfa Head, 4% in the adjoining fields where the Site Campus would be located and the remainder of the time to the west of the Magnox buildings, presumed to be at Trwyn Pencarreg where there is suitable habitat. The results indicate that the loss of foraging from the construction and operation of the Site Campus will not adversely affect chough through a loss of foraging habitat, provided that Wylfa Head is adequately maintained. The appropriate management of Wylfa Head will be secured through the LHMS and the corresponding Landscape and Habitat Management Scheme which Horizon will continue to consult with the North Wales Wildlife Trust on.</p> <p>Horizon have discussed the issue of disturbance from the workforce with the North Wales Wildlife Trust and other stakeholders at a meeting on the 10<sup>th</sup> October 2018. Horizon can confirm that gates marked on the submitted plans are for emergency use only and that workers wishing to access Wylfa Head for recreational purposes will have to walk 4.7km in each direction to gain access. Horizon believe that this will deter casual visitors to Wylfa Head but there will still be some workers who wish to visit. Measures to manage increased visitors to Wylfa Head have been discussed and will be included in the Wylfa Head Landscape and Habitat Management Scheme which will require approval by IACC, as secured by Requirement WN11 of the draft DCO (REP2-020). The measures that have been discussed with the North Wales Wildlife Trust and other stakeholders include fencing off the chough nesting site with an adequate buffer during the critical establishment period, way marking of routes across Wylfa Head away from the most sensitive areas, and installation of signs and interpretation boards informing visitors of sensitive areas to avoid. These measures have been included in the LHMS submitted at Deadline2 (REP2-039) Workers residing in the Site Campus will be informed of the sensitive nature of Wylfa Head and the species it supports (including their legal protection where relevant). The Site Campus will also be designed to provide entertainment facilities on-site, reducing the potential need for workers to leave site for recreation.</p>	Not agreed	No further actions identified at this time.

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				<p>3.146 et sequel] are equally relevant to the matter of recreational pressures from the TWA workers and other construction staff on this part of the Wnda. The Workforce Management Strategy does not provide adequate provisions to prevent impacts to ecological receptors in the vicinity of the Site Campus. Awaiting further information.</p> <p>North Wales Wildlife Trust question the effectiveness and achievability of the proposed off-site SSSI compensation based on the DCO submission. Awaiting further information.</p>	<p>The Environmental Statement has considered the impact of the Site Campus and other construction activities, including major changes to landform within the Tre'r Gof catchment due to the construction of Mound A, and has concluded that there will be a significant adverse effect. The impacts have been mitigated as far as possible but there remains uncertainty over the effectiveness of this mitigation and therefore the precautionary principle has been applied and a worst case scenario has been assessed, resulting in predicted significant residual effects. As such Horizon are proposing to compensate the potential loss of Tre'r Gof SSSI through the creation of new fenland habitat and enhancement of existing wetland habitat on Anglesey.</p> <p>North Wales Wildlife Trust's concern on the management of topsoil is acknowledged by Horizon and the feasibility of different topsoil management options is under consideration. This will be shared with the North Wales Wildlife Trust once the work is complete and will be detailed in the final landscape and habitat scheme where appropriate, in accordance with Requirement WN9 of the Draft DCO.</p> <p>The compensation site selection process, which is detailed in Appendix D9-23 (APP-190) has identified a compensation package with high potential to meet the compensation objectives through the provision of more than 10ha of rich-fen habitat creation and a further 20ha of enhancement of existing fen/mire habitats, as well as improving habitat connectivity between units of the Anglesey Fens SAC.</p>		
Biodiversity net gain	European protected species, Section 7 species and Red Data Book species. Habitat connectivity within the restored landscape.	NWWT7	<p>REP2-039 Deadline 2 Submission - 8.16 Landscape and Habitat Management Strategy (Rev 2.0)</p> <p>REP4-023 Deadline 4 Submission - Ecological Enhancements Mitigation Report</p>	<p>The North Wales Wildlife Trust do not consider that the biodiversity principle of no net loss or net gain has been applied to habitats and those that support of protected species including European Protected Species, species listed under Section 7 of the Environment (Wales) Act 2016, red species listed in the Red Data Book or loss of marine habitats.</p> <p>The DCO application does not consider habitat connectivity within or relating to the wider landscape for recolonisation by protected or biodiversity species.</p> <p>The draft Requirement WN9 and WN11 [REP2-020] and the revised Phasing Strategy [REP4-014] clearly indicate that the LHMS will not be submitted to IACC for agreement until 12 months prior to the Commission Date of Unit 2 (Y9) and therefore implementation of any scheme will occur in the next growing season post agreement – ie Y10 at the earliest, with all operational mounds being identified as being delivered at the end of reinstatement [Table 2-1 REP4-014].</p> <p>Provisions under WN12 (Notable Wildlife Enhancement Area) and WN13 (Reptile Translocation Site) only state that management of these sites will only occur for the duration of the undertaker's interest. There is no indication of what period of</p>	<p>The principle of net biodiversity gain is secured through the Landscape and Habitat Management Strategy (LHMS, REP2-039). Section 4 of the LHMS sets out the principles which secure net biodiversity gain. The principles are a controlled part of the document and therefore a commitment under the DCO which requires (Requirement WN11) their implementation through a series of Landscape and Habitat Management Schemes. The principles include a net increase in habitat for protected species including reptiles, chough, and bats, the enhancement of freshwater habitats for water vole and otter; and, an increase in the carrying capacity of a range of other notable and protected species listed in Annex A of the LHMS, across the Wnda once operational.</p> <p>Since the submission of the DCO application, Horizon have committed to offset the loss of ponds during construction through the creation of nine new ponds which will be designed and managed throughout operation for the benefit of wildlife. This is part of an updated LHMS (REP2-039) that was submitted at Deadline 2 (December 4<sup>th</sup> 2018).</p> <p>Section 4 of the LHMS contains a principal which requires the final landscape design to distribute the specified habitats in such a way as to facilitate the movement of species across the restored site and into the surrounding landscape. The principle specifically references connectivity with the Notable Wildlife Enhancement site. The indicative landscape design is one way in which this principle can be implemented and the final design is likely to closely resemble the indicative design. The final design will need to be approved by the IACC (in accordance with DCO Requirement WN9) and the Council's officers will need to satisfy themselves that all of the habitat principles have been implemented in the design before approval can be issued.</p> <p>In addition, Horizon have submitted further proposals for marine benthic habitat enhancement on the breakwater at Deadline 4 (REP4-023) (see issue NWWT8).</p>	Ongoing	eNGOs to review updated LHMS

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				overlap with the LHMS is proposed to allow species recolonisation as indicated in the LHMS.			
	Loss of marine habitats.	NWWT8	APP-132 6.4.13 ES Volume D – WNDA Development D13 – The Marine Environment WN0902-JAC-PAC-TEC-00011 Marine ecological enhancement mitigation memorandum APP-444 8.26 Water Framework Directive Compliance Assessment REP2-033 Deadline 2 Submission - 8.8 Marine Works Sub-Code of Construction Practice REP4-023 Deadline 4 Submission - Ecological Enhancements Mitigation Report	The marine works will result in the direct loss of approximately 30ha of marine benthic habitat. The proposals for the mitigation for the loss of these marine habitats in both the DCO application and the issued memorandum is insufficient in both quality and quantity. Comments to be submitted at Deadline 5 or 6.	The direct losses of intertidal and subtidal habitats are assessed in DCO ES chapter D13 (APP-132) and in the WFD compliance assessment (APP-444). There would be a total loss of approximately 31ha of marine habitat, of which, 20ha have been classified as subtidal and intertidal habitats of conservation importance. The loss of habitats results from the footprint of the permanent and temporary marine works. This loss of habitat of conservation importance is assessed as being a moderate adverse effect within chapter D13 (APP-132) of the DCO ES. Additional mitigation through ecological enhancement will be provided to increase the diversity and biomass of ecological communities on the new marine structures resulting in a reduction of the effect on subtidal and intertidal rocky reef habitats to minor adverse. Further details of the proposals for marine ecological enhancement and marine restoration have been submitted to the Examining Authority at Deadline 4 (REP4-023) with the measures being secured in the Marine Works Sub CoCP to be submitted at Deadline 5 (12 February 2019)  REP4-023 provides an appraisal of the available measures and the feasibility and constraints of implementing for the Wylfa Newydd Project to satisfy the requirements of Test (a) of Article 4(7) of the WFD; to ensure that all practicable mitigation measures have been included in the project.	Ongoing	NWWT to review REP4-023
	Long term maintenance and sustainability of recreated biodiversity habitats.	NWWT9	REP2-039 Deadline 2 Submission - 8.16 Landscape and Habitat Management Strategy (Rev 2.0)	The North Wales Wildlife Trust are concerned that the maintenance of habitats created as part of the site restoration will not be maintained for the operational & decommissioning lifetime of the project when land is returned / management transferred to other landowners. No mechanism has been identified to ensure compliance on transfer of title / tenancy.  WN11 of the DCO does not provide a timescale for how long the habitat management plans will be in place and continued to be implemented. For the avoidance of future doubt this should be adjusted. For example; The agreed management schemes will be implemented until the Power Station is decommissioned (or other agreed date).  The LHMS [REP2-039 ∞ 7.2] indicates that the design principles (Chapter 4) will be implemented for the life time of the power station. It goes on to indicate that planting (trees) will be monitored for 10 years in total and that management prescriptions will be reviewed regularly (every 5 years), but not over what length of time this will continue. NWWT feel that clarity is needed to define the LHMS management plan implementation	The LHMS (REP2-039) sets out the information that will need to be included in the habitat management schemes which are secured as a Requirement of the DCO. The habitat management schemes will need to be approved by the IACC whose officers will need to be satisfied that they deliver the principles set out in the LHMS before approving the schemes. Horizon is required by Requirement WN11 of the DCO to ensure that the habitat management schemes are implemented appropriately. There are a number of ways in which this could be achieved, including tenancy agreements with local farmers, licence agreements with local farmers, and the use of specialist contractors to undertake specific management activities. While it is acknowledged that the nature of the management delivery mechanism will have a bearing on management success, such detail is not considered necessary at this stage and the absence of such detail is not considered to detract from the adequacy or ambition of the habitat creation and management proposals contained within the LHMS (REP2-039).	Not agreed	No further actions identified at this time.

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				period (ie Chapter 7) for the avoidance of any future doubt.			
Air quality	Air quality impacts on ecological receptors	NWWT10	<p>APP-124 6.4.5 ES Volume D – WNDA Development D5 – Air Quality</p> <p>APP-140 6.4.21 ES Volume D – WNDA Development App D5-2 – Main Site Construction Phase Air Dispersion EIA – Final Modelling Report</p> <p>APP-128 6.4.9 ES Volume D – WNDA Development D9 – Terrestrial and Freshwater Ecology</p> <p>REP2-032 Deadline 2 Submission - 8.7 Main Power Station Site Sub-Code of Construction Practice</p> <p>REP2-033 Deadline 2 Submission - 8.8 Marine Works Sub-Code of Construction Practice</p> <p>REP3-052 Deadline 3 Submission - Air Quality Mitigation Quantification Report</p>	<p>The North Wales Wildlife Trust have concerns on the air quality mitigation given the conclusion of adverse impacts on Tre'r Gof SSSI. There remain questions on evaluation parameters for other receptors sensitive to air quality including Cae Gwyn SSSI and Trwyn Pencarreg Wildlife Site. North Wales Wildlife Trust are concerned that there has been insufficient investigation of amelioration of impacts and whether the monitoring strategy will be effective.</p> <p>North Wales Wildlife Trust have reviewed the additional information contained in the revised Main Site sub-CoCP (REP2-032) and Marine Works sub-CoCP (REP2-033) and the additional assessment (REP3-052). NWWT note that there are still increases in deposition at ecological receptors Trwyn Pencarreg (increase over baseline by 13% at Y2 and 2% at Y5 [REP4-044]) and Cae Gwyn SSSI (NNRW representations). NWWT accept the results of the assessment and welcome the additional measures to control construction plant and marine vessel emissions. However, NWWT wish to see further emission controls by including an additional mitigation measure that requires moored vessels to operate from an electric hook up to minimise emissions while at berth.</p>	<p>Horizon committed to additional mitigation to reduce the emissions of NOx from construction plant in the DCO application and this was subsequently specified in the updated Main Power Station Site sub-CoCP (REP2-032) and Marine Works sub-CoCP (REP2-033) that were submitted at Deadline 2). This mitigation included stringent controls for land-based construction plant and equipment (i.e. 90% of non-road mobile machinery to meet the EU Stage IV emission standards) and also a requirement for marine vessels involved in the construction of the Marine Works which is considered to go beyond best practice (i.e. a requirement to meet the International Marine Organisation Tier III NOx emission limits even though these do not apply to the Irish Sea and do not come into effect for vessels constructed from 2021 onwards and which operate in the North Sea).</p> <p>The specified mitigation acts to reduce adverse air quality effects at all ecological receptors and this was demonstrated in the revised air quality assessment submitted at Deadline 3 (REP3-052). Although a minor adverse air quality effect is predicted at Tre'r Gof SSSI, the year 2 nitrogen deposition is now approximately 70% lower than presented in chapters D5 Air Quality (APP-124) and D9 Terrestrial and freshwater ecology (APP-128). The specified additional mitigation also screens out Cae Gwyn SSSI from requiring further ecological assessment in all aspects except nitrogen deposition, which is only slightly above the critical load value during construction year 2 (peak earthworks and marine works). The increment in nitrogen deposition is only 0.2kgN/ha/year which is smaller than the normal inter-annual variation in existing deposition rates from other local, regional and international sources. The revised air quality assessment submitted at Deadline 3 (REP3-052) concluded a minor adverse effect at Cae Gwyn SSSI. At Trwyn Pencarreg Wildlife Site, the additional mitigation reduces all parameters to lower than the criteria for requiring further ecological consideration and therefore a negligible adverse effect is predicted. The assessment was undertaken using the methodology and assessment criteria agreed with NRW and the IACC.</p> <p>The NWWT has requested that 'berth-side electric hook-ups' are installed to reduce marine vessel emissions. This type of mitigation would only apply to marine vessels which are using the MOLF once it is operational (i.e. marine vessels delivering materials to the Wylfa Newydd Development Area from year 3 of the construction onwards). The effectiveness of such mitigation to reduce nitrogen deposition at ecological receptors is extremely limited as the peak NOx emissions (and peak of adverse effects at ecological receptors) is during the bulk earthworks and construction of the MOLF and other aspects of the Marine Works (i.e. years 1 and 2). Furthermore, the delivery vessels at berth would use the much smaller auxiliary engines or generators to maintain ship-board power rather than the main engines used for propulsion and manoeuvring.</p> <p>Horizon considers that the two measures combined (i.e. 90% of non-road mobile machinery to meet the EU Stage IV emission standards and marine vessels involved in the construction of the Marine Works to meet the Tier III NOx emission limits) demonstrate Horizon's commitment to reducing NOx emissions from construction activities to as low as possible.</p>	Not Agreed	No further actions identified at this time.
Dredged materials	Beneficial reuse of dredged materials	NWWT11	APP-132 6.4.13 ES Volume D – WNDA Development D13 – The Marine Environment	The North Wales Wildlife Trust do not agree with the proposal to dispose of dredged material at the Holyhead Deep disposal site. Beneficial reuse of the dredged material should be investigated and only once all other	In accordance with the findings of the Waste Strategy Framework Directive Assessment (submitted as part of Horizon's Marine Licence application) excavated material from the inner harbour will be reused on site (e.g. for core material in the cooling water intake breakwaters) where practicable and safe (in accordance with the Draft Welsh National Policy). Dredged rock and soft	Not agreed	No further actions identified at this time.

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				<p>options have been ruled out should disposal be considered.</p> <p>The information as presented in the eNGO WR [REP2-348 Chapter 5] indicates their position in relation to this matter.</p> <p>With the recent inclusion by Horizon of 'monitor and adaptive management' to Esgair Gemlyn (see NWWT 2 above) the measures proposed by the eNGOs would be appropriate and a sustainable management approach. The measures would be compliant with the Waste Strategy Framework Directive, the Shoreline Management Plan and OSPAR guidance on the beneficial re-use of dredged materials.</p>	<p>sediments from the outer harbour will be disposed at the Holyhead Deep disposal site. Removing marine material for no confirmed re-use on-land and for indefinite storage, will require additional material handling facilities, new offloading facilities and plant, and additional land outside of the Order Limits for storage. This is not included or assessed within the DCO application. Furthermore, advice received from NRW requests that all superficial soft sediment material dredged from the outer harbour should be disposed of at sea. Horizon understands that this request was based on keeping the material in the marine environment, such that it is not a loss to the local marine sediment budget source. In consultation with NRW, Horizon suggest that should material be required for resilience measures to Esgair Gemlyn this would be sought from nearby quarries.</p>		
Reptiles	Reptiles on the WNDA	NWWT12	APP-128 6.4.9 ES Volume D - WNDA Development D9 - Terrestrial and freshwater ecology	<p>The North Wales Wildlife Trust require that pre-commencement surveys at the WNDA include population estimates to demonstrate that the translocation site at Mynydd Ithel has adequate capacity. Horizon acknowledge that changes in habitat condition may improve the WNDA's suitability for reptiles [REP2-349 3.91 – quoting Horizon's APP-177 conclusions section 5)</p>	<p>Baseline surveys and assessment of impacts on reptiles have been included in the ES (Chapter D9 [APP-128]) for the entire WNDA, including the Site Campus. No further population estimates are considered necessary for the Site Campus site, as there has been no significant change in the habitats present. The proposed reptile receptor site at Mynydd Ithel is considered to have sufficient capacity for the low numbers of common lizard and adder that may be present within the proposed Site Campus footprint and the wider WNDA.</p>	Not Agreed	No further actions identified at this time.
Bats	Impact of light spill on bats TWA	NWWT13		<p>The North Wales Wildlife Trust are concerned that light spill from the Site Campus and associated Multi Use Games Area (MUGA) will impact on dark commuting corridors to and from the nearby bat barn. This would reduce the ability for the bat barn to function properly. This would appear to be contrary to the Habitats Regulation derogation tests undertaken when the bat barn was constructed. It is not a matter that should be left for later determination. [REP2-349 3.114 and not covered in Horizon's REP3-047 Light Spill technical Note]</p> <p>In addition, NWWT is not likely to be in a position to review this scheme or any other matters post the determination of the DCO, due to resource constraints as the engagement with Wylfa Newydd DCO was granted aided.</p>	<p>Horizon have committed to producing a Construction Lighting Scheme which will be secured by a Requirement (DCO Rev 4.0 submitted at Deadline 5) prior to commencing construction works which will include mitigation to protect dark corridors to and from the bat barn. The Construction Lighting Scheme will be submitted to the Isle of Anglesey County Council for approval in consultation with NRW.</p>	Not Agreed	No further action
s.106	Adequacy of the Section 106 agreement	NWWT14		<p>Following the SoCG meeting on the 28<sup>th</sup> January 2019, it was noted "The s.106 agreement includes specific provisions for the NWWT and NT but very little in the way of consultation has been undertaken with these organisations. There is no clarity on how the figures have been derived and there is uncertainty on how the measures will be secured." A number of these are wider cross-</p>	<p>Horizon note the North Wales Wildlife Trust's concerns and have responded in detail to them at Deadline 5.</p>	Not Agreed	No further action

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				cutting matters, which have relevance to nature conservation or restoration issues raised across the proposals and have been laid out in the National Trust's D4 submission [REP4-038], which NWWT contributed to, in relation to the draft s.106 [REP3-043]. These matters are still outstanding as Horizon have not initiated any engagement or negotiations with the eNGOs subsequent to D3 or at any time during the PAC or DCO processes.			

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