



CYNGOR SIR
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ISLE OF ANGLESEY
COUNTY COUNCIL

Draft New Nuclear Build at Wylfa: Supplementary Planning Guidance

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Schedule of Consultation
Responses

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I Overview

Consultation on the draft New Nuclear Build at Wylfa: Supplementary Planning Guidance (Wylfa NNB SPG) commenced on 17th February and ran until 31st March 2014. The consultation comprised the publication of the draft SPG for comment (including a questionnaire posing 19 questions) and three supporting public exhibitions held in Cemaes Bay, Holyhead and Llangefni.

In total, 52 individual responses were received to the consultation from a range of consultees and stakeholders. A total of 26 respondents completed the questionnaire, full or in part, with the remainder responding via letter or e-mail. Comments were received from the following:

- Isle of Anglesey County Council (the County Council) departments, including Housing, Lifelong Learning, Environmental Health and Economic and Community Regeneration;
- Other local authorities, namely Conwy and Gwynedd;
- Statutory consultees including Natural Resources Wales (NRW) and the Welsh Language Commissioner and utilities providers (including the Local Health Board and Welsh Water);
- Representative organisations and landowner/developers, including the Federation of Small Businesses, Conygar PLC, Meyrick Estates and the Anglesey Economic Regeneration Partnership;
- Other healthcare providers;
- The project promoter, Horizon;
- Local residents and groups, including the People Against Wylfa B (PAWB).

2 Schedule of Consultation Responses

The County Council has reviewed each consultation response. Each response has then been summarised where appropriate and the summary placed within the Schedule of Consultation Responses contained at **Table I**. The Schedule of Consultation Responses also includes the County Council's response to each issue raised and an indication as to whether it is proposed to amend the draft Wylfa NNB SPG and how the document is to be revised.

Table I Schedule of Consultation Responses

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
A001	3. The Vision	The people of Anglesey did not get a say with regard to the Energy Island and visitor numbers are starting to reduce as a result of renewable and nuclear energy proposals.	<p>Comment noted. The Energy Island Programme was formally established in June 2011 in order to maximise opportunities from major energy developments. Given the scale of the impacts and opportunities, a different approach was required by the County Council to capitalise on the benefits of these major developments.</p> <p>There is no evidence to support the claim that visitor numbers are starting to reduce as a result of these major developments. In fact, the latest figures show an increase in visitor numbers for 2013 (see http://www.anglesey.gov.uk/empty-nav/news/press-releases-2014/may-2014/tourism-worth-256m-to-anglesey-economy/122993.article).</p>	No change.
	9. Construction Workers Accommodation	Local people should be put first with energy only benefiting the locals.	Comment noted. UK Government has identified the site at Wylfa as a location for a Nationally Significant Infrastructure Project. In this context, the energy	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
			generated by any future nuclear power station is intended to benefit the UK as a whole, including Anglesey.	
	10. Welsh Language and Culture	Impact on local culture.	Comment noted. Reflecting existing and emerging local planning policy set out in the Development Plan, the stopped UDP and the JLDP, guidance contained in the draft Wylfa NNB SPG is designed to minimise adverse impacts on local culture (including the Welsh language) and maximise benefits. It is not clear from this response what additional guidance could be included.	No change.
	13. Waste	The Island is already polluted by Wylfa.	Comment noted. Guidance contained in the draft SPG relates specifically to the NNB at Wylfa and not the existing power station. Notwithstanding, the guidance seeks to protect health (see GP7) and ensure that interim nuclear waste storage does not have any adverse socio-economic or environmental impacts (see GP17).	No change.
	15. Natural Environment	None of the Energy Island plans benefit the natural environment nor communities around them.	Comment noted. The draft Wylfa NNB SPG is not concerned with the wider Energy Island Programme (although it does seek to address potential cumulative impacts). Notwithstanding, the draft SPG specifically seeks to conserve and enhance the Island's natural environment (see GP20 in particular) and maximise benefits for the Island's communities.	No change.
	17. Facilitating Development	Possible use of the (former) railway to Amlwch to reduce heavy traffic on the highway.	Comment noted. GP14 of the draft Wylfa NNB SPG seeks to maximise the use of rail. However, the costs of restoring the (former) railway to Amlwch are understood	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
			prohibitive and would still require onward transport to the NNB by road.	
	18. Implementation & Monitoring	Why is Gwynedd involved in the LDP for Anglesey?	Anglesey and Gwynedd County Councils have agreed to prepare a Joint Local Development Plan covering both local authority areas in order to address key strategic issues. This approach has been commended by the Welsh Government.	No change.
	19. Area Guidance	There should be no nuclear with sufficient power for the Island to be self sufficient only.	As noted above, UK Government has identified the site at Wylfa as a location for a Nationally Significant Infrastructure Project. In this context, the energy generated by any future nuclear power station is intended to benefit the UK as a whole, including Anglesey.	No change.
A002	8. Population and Community	Insufficient attention paid to the potential impact of in-migration on the local community.	Disagree. The draft Wylfa NNB SPG seeks to maximise, so far as is possible, the potential for economic opportunities created by the NNB for the benefit of local people which is expected to help reduce in-migration. Additionally, the draft SPG includes specific guidance designed to minimise the impact of in-migration on the Island's communities.	No change.
	9. Construction Workers Accommodation	The concern is that workers will all be accommodated in Holyhead which will suffer at the expense of the rest of the Island.	Comment noted. Reflecting existing and emerging local planning policy, the draft Wylfa NNB SPG seeks to direct development towards the Island's main settlements including Holyhead. The County Council recognises that the provision of construction worker accommodation in Holyhead may have both adverse and positive effects which the draft SPG seeks to address by the way of	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
			locationally specific guidance (see GP27).	
	10. Welsh Language	The project may not affect the language to the extent feared by some.	Comment noted.	No change.
	11. Transport	It is unlikely that the Council will be able to control vehicle movements to the extent envisaged.	Reflecting existing local and national planning policy as well as emerging local planning policy The County Council considers that the draft Wylfa NNB SPG strikes the right balance in terms of minimising adverse effects associated with the vehicle movements during the construction of the NNB whilst providing the project promoter the opportunity to develop and workable transport strategy.	No change.
A003	2. Purpose	Do not understand question and purpose.	The County Council accepts that the wording of question 2 was slightly confused due to a typing error but that the tenet of the question remained.	No change.
A004: Horizon Nuclear Power	2. Purpose	Supports overall purpose of the Wylfa NNB SPG subject to comments. Suggest footnote at 1.1.10 to explain the potential for call in/determination by ministers. Also para 1.3.2 a statement of consultation should be included to cover representations received and responses given.	Agreed.	Para 1.1.10 to be amended to reference potential for call-in. Section 1.3 to be amended to reflect completion of the consultation process.
	3 Vision	Welcomes positive vision. Should note that voluntary community payments by the developer (para 3.1.4 and 4.12.5) will not be necessary to make development acceptable and should not form part of the SPG.	Comment noted. The Vision set out in the Section 3.1 of the draft Wylfa NNB SPG relates to the NNB as a whole and not the SPG. However, para 3.1.4 could be amended to refer more clearly to compensation as opposed to voluntary community benefits. The draft Wylfa NNB SPG clearly sets out at para 4.12.6 that community benefit	Amend para 3.1.4 to refer to compensation and delete reference to voluntary community benefits. Amend title of GP23 to remove reference to 'Community Benefits'.

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			contributions are separate and distinct from the planning process. Notwithstanding, it is recognised that the title of GP23 'Planning Obligations and Community Benefits' may be misleading.	
	4. Objectives	Para 3.2.3 should reflect that associated development sites need to also be in locations with suitable access to the NNB site.	<p>Comment noted. Objective 2 seeks to ensure that employment uses are in suitable locations, with a focus on legacy. Suitable locations in this context relate to legacy but the County Council would expect this to include consideration of access to the main NNB site. In this respect, Objective 6 (bullet point 4) states the importance of providing good access to the new power station.</p> <p>However, it is accepted that Objective 2 could be clearer in this regard and that bullet point 5 of Objective 6, which relates to accessibility of construction worker accommodation, could be amended to include reference to the main NNB site.</p>	Amend Objective 2 (bullet point 5) and Objective 6 (bullet point 5) to include reference to the main NNB site.
		Appears to be a conflict between 'growing' tourism whilst seeking a third of workers housed in tourist accommodation.	Disagree. The approach to Construction Workers Accommodation set out in GP10 of the draft Wylfa NNB SPG has been informed by the County Council's adopted Construction Workers Accommodation Position Statement. The Statement, which was informed through engagement with key stakeholders including Horizon and the Tourism Association, seeks to accommodate a third of workers in purpose built accommodation, a third in private rented accommodation and a third in tourist accommodation. By accommodating a third of workers in tourist accommodation,	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
		<p>Para 3.2.4 bullet point 4 (Objective 3) – it is not clear what is meant by ‘supporting retail provision’.</p> <p>Para 3.2.6 bullet point 1 (Objective 5) refers to ‘protecting and, where possible, enhancing ..’. but it may not be possible to protect some areas, and effects will need mitigation. Not clear why Beaumaris Castle is referred to.</p>	<p>the County Council considers that this approach offers the greatest potential to support the tourism economy, particularly outside the main holiday season. Notwithstanding, GP12 of the draft SPG also seeks to ensure that there will be no significant adverse effects on this sector.</p> <p>Comment noted. This element of the objective relates to maximising the potential for the influx of NNB workers to help enhance the viability of existing retail provision, particularly in the Island’s main settlements.</p> <p>Comment noted. The County Council recognises that there may be some instances where adverse effects may be unavoidable. In response, GP21, for example, states that, where the potential for adverse impacts is identified, measures should be implemented to mitigate these impacts’. Notwithstanding, it is considered that the SPG could be clearer in terms of reference to the need for impacts to be mitigated and, where this is not possible, compensated for.</p> <p>Beaumaris is identified in Objective 5 as an example of one of the Island’s most important heritage assets (as part of a World Heritage Site).</p>	<p>No change.</p> <p>SPG to include clear references to the Council’s expectation that the consideration of impacts should follow the following hierarchy: avoidance, mitigation, compensation.</p>
	5. Project Wide Guidance	As drafted, the SPG includes guidance in relation to the DCO, which is not appropriate, because the County Council is not the determining authority. In this regard GP17 is not appropriate, recommend removal.	Disagree. The County Council considers it essential that the Wylfa NNB SPG includes guidance relating to nuclear water storage. Such guidance (as that set out in GP17) is intended to clearly set out the Council’s	Include supporting text that clearly outlines the rationale for GP17.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
			<p>expectations in respect of waste storage to:</p> <ul style="list-style-type: none"> • Inform the project promoter's proposals (whether the proposals for interim storage forms part of the DCO application or are a separate planning application made to the County Council) • Inform the County Council's Local Impact Report in respect of the DCO; • Help inform the determination of any planning application submitted to the County Council for nuclear waste storage facilities. 	
	6. Economic Development	<p>Supportive of Energy Island Programme and Enterprise Zone but questions appropriateness of including 'promotion of opportunities in renewable..' in GP1 as guidance is related to NNB. Not appropriate for SPG to specify requirements for socio-economic assessments for NNB and should only refer to associated development.</p>	<p>However, the County Council considers that the purpose of GP17 could be more clearly established in the supporting text.</p> <p>Disagree. The County Council fully anticipates that associated developments and development at the main NNB site will present opportunities for the incorporation of renewables which in-turn may facilitate growth in the Island's renewables sector.</p> <p>The requirement in GP1 for socio-economic assessments in support of the DCO application reflects national policy contained in NPS-EN1 and NPS EN-6. The County Council would utilise the information contained in any socio-economic impact assessment to inform its Local Impact Report.</p>	No change.
	7. Tourism	<p>Agree with wording of GP5, however refer to comment under Q4. Plus wording to the effect</p>	<p>Agreed. The guidance should recognise that there may be instances where adverse</p>	<p>Amend GP5 to highlight that, where adverse effects</p>

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
		of 'where adverse significant impacts are identified' should be used in GP5 when describing potential mitigation measures.	effects cannot be avoided and mitigation/compensation will be expected.	cannot be avoided, the County Council will expect appropriate mitigation/compensation measures to be implemented.
	8. Population and Community	<p>Until assessments are undertaken it is inappropriate to identify potential conditions which the County Council may apply and which should in any regard be set in relation to mitigation identified.</p> <p>Construction involves long sustained periods of activity. Clarification of expectations in terms of 'restriction of construction hours' in GP7 therefore requested.</p>	<p>Comment noted. The conditions and mitigation measures identified in GP7 are indicative only and are provided as an example of what the project promoter/County Council could consider as a way of mitigating adverse effects. In this respect, the County Council does not have any expectations in terms of, for example, restriction to construction hours at this stage.</p>	No change.
	9. Construction Workers Accommodation	<p>Considers that guidance is inconsistent. GP10 refers to a one third split of accommodation types whilst requiring measures to mitigate adverse effects upon the local housing market which could be avoided if a more flexible split is proposed. GP9 seeks integration of construction worker accommodation which may be difficult to achieve. If the proposed one third split is not required in private rented then potential adverse effects could be avoided.</p>	<p>Disagree. The approach to Construction Workers Accommodation set out in GP10 of the draft Wylfa NNB SPG has been informed by the County Council's adopted Construction Workers Accommodation Position Statement. The Statement, which was informed through engagement with key stakeholders including Horizon, seeks to accommodate a third of workers in purpose built accommodation, a third in private rented accommodation and a third in tourist accommodation. The County Council considers that this approach: provides flexibility, by offering a range of accommodation choices for construction workers; provides an element of easily accessible (on-site) accommodation close to Wylfa to meet the operational needs of the construction site; enables the temporary demand for worker</p>	<p>GP10 and GP12, including supporting text, to be amended to enable the consideration of any updated Construction Worker Position Statement/equivalent evidence.</p>

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
			<p>accommodation to enhance the local housing offer and tourism; maximises the potential to deliver lasting legacy benefits.</p> <p>The integration of construction worker accommodation as promoted in the draft Wylfa NNB SPG including under GP9 is a key aspiration of the County Council in order to maximise legacy benefits for the Island's communities and support the wider spatial strategy of existing and emerging local planning policy.</p> <p>However, the County Council recognises that there may be a need to review the Position Statement to take account of the project promoter's construction worker profile and any recent evidence/data and that the SPG should acknowledge this.</p>	
		Equally inconsistent to require minimisation of travel but to limit accommodation sizes. SPG needs to retain flexibility. Also GP27 does not provide sufficient flexibility to consider alternatives.	Disagree. The County Council considers that it is not necessarily inconsistent to minimise the need to travel and limit construction worker accommodation at the main site. Supporting the provision of construction worker accommodation in the Island's main settlements will help to ensure that it is accessible to key services and facilities. Additionally, this approach will help to ensure that accommodation that is occupied post-construction will be accessible, providing a legacy benefit to the Island's communities. However, the guidance set out in GP10 makes provision for essential construction worker accommodation at the main site.	No change.
		Horizon seeks greater flexibility to identify	Disagree. The County Council considers	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
		suitable solutions for construction worker accommodation. The wording of GP27 does not give enough flexibility to consider alternatives. Suggest deleting everything after first sentence in the Land and Lakes box and deleting word 'fully' from the first sentence.	that GP27 provides sufficient flexibility for the project promoter to consider alternatives to Land and Lakes providing there is strong justification why the scheme is not suitable. Should Horizon have a preference for an alternative site then in any respect, the County Council would expect the project promoter to consider alternatives. The proposed amendment is therefore rejected.	
		Aim will be to 'encompass high quality, sustainable design standards where possible' therefore para 4.4.7 needs to be amended to reflect this.	Disagree. The County Council fully expects any proposal for construction worker accommodation to be of high quality, sustainable design. The proposed amendment is therefore rejected.	No change.
	10. Welsh Language and Culture	Agree with the GP.	Comment noted.	No change.
	11. Transportation	GP14 should refer to 'examination' of the use of rail and waterborne transport modes, rather than prioritise.	Disagree. NPS-EN1 (para 5.13.10) states that water-borne or rail transport is preferred over road transport at all stages of the (NPS) project, where cost-effective.	No change.
		GP14 should reference WelTag for wales.	GP14 of the draft Wylfa NNB SPG refers to WelTag. No change is therefore required.	No change.
		GP3 does not recognise a potential conflict with landscape and townscape character and therefore it is recommend the bullet point 3 of GP3 is reworded to read 'ensure that associated development sites chosen are easily accessible by a range of sustainable transport modes and, where possible, mitigate any potential conflict with the landscape and townscape character of the surrounding area'.	Agreed.	GP3 to be amended to reflect response.

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		Important for guidance to maintain the option of MOLF as use of Holyhead Port and onward transportation could have a larger impact on A5025.	Comment noted. The County Council recognises that a MOLF may be the preferred means of delivering bulk construction materials and ALLs and this is reflected in para 4.6.9 of the draft Wylfa NNB SPG.	No change.
	12. Utilities	Supports requirement to upgrade existing infrastructure although NNB is part of the DCO and a matter ultimately for the Secretary of State and not appropriate for guidance to deal with impacts of NNB on utilities.	Disagree. Impacts arising from utilities provision associated with the NNB could have indirect effects on the provision of utilities across the Island. In consequence, the County Council considers it essential that the Wylfa NNB SPG contains guidance to both inform the project promoter's proposals and the Council's Local Impact Report.	No change.
	13. Waste	Reference to Q5 re interim radioactive waste storage.	See response to Q5.	In addition, and in response to other comments received, an additional reference to in GP17 will be made to potential radiological effects and the need to assess them.
	14. Climate Change	Agree with GP but mentions that guidance should only relate to associated development.	Comment noted. Whilst GP18 relates principally to associated development, reflecting NPS EN-1 the County Council would expect development at the main site to contribute to the mitigation of climate change. In this context, GP18 should help to inform the project promoter's proposals and the County Council's Local Impact Report.	No change.
	15. Environment	Broadly welcomes GP20, although it may not always be possible to protect and any impacts will require mitigation. Recommends change of	Comment noted. The County Council recognises that it may not be possible to avoid adverse impacts on the Island's	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
		wording around conserving to 'where possible'. Also applies to GP26.	natural and built environmental assets. In this respect, GP20 (for example) states that, where significant adverse impacts cannot be avoided, the County Council expects appropriate mitigation and/or compensation measures to be implemented. In consequence, the County Council does not consider it necessary to amend the guidance.	
	16. Historic Environment	Broadly welcomes GP22. However, desire to protect the historic environment should include reference to 'where possible'.	<p>Comment noted. The County Council agrees that the wording of GP22 is inconsistent with that of GP20 in that it does not set out an expectation for mitigation if significant effects cannot be avoided. This is because the Council (as decision-maker with regard to associated developments) is bound by the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving a listed building or its setting and this will be irrespective of any mitigation offered.</p> <p>Accordingly, any attempt to offer mitigation if significant effects to listed buildings cannot be avoided can only be considered on the proviso that it does not fetter the duty of the County Council as decision maker in relation to its duty under section 66 of that Act.</p>	No change.
	17. Facilitating Development	Draft SPG suggests that adverse impacts are greater than benefits, in relation to 4.12.2 should be rephrased as '... and compensate for any adverse impact of the Wylfa NNB..' and use the term 'any' when discussing 'adverse impacts'.	Agreed.	Paragraphs 4.12.1 and 4.12.2 to be amended to refer to 'any' adverse impacts.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
		Concerned that existing UK or Welsh planning policy is not in place providing for community benefits of the sort envisaged in draft SPG. Therefore questions whether the draft SPG is creating new policy and the appropriateness of GP23.	See response to Q3.	No change.
	18. Monitoring and Implementation	Supports.	Comment noted.	No change.
	19. Area Guidance	Broadly supportive, however in relation to Holyhead and Environs, refers to Q9 around ensuring flexibility to consider alternative sites.	See response to Q9.	No change.
A005	3. The Vision	The Vision does not set out what Anglesey should look like after the NNB. A better example might be: "To create an Anglesey where the residents will thrive from skilled sustainable employment in a high quality environment, whilst retaining the Island's unique beauty and identity for the enjoyment of visitors and locals alike."	Comment noted. It is considered that the Vision provides sufficient clarity and detail in relation to the County Council's transformational socio-economic aspirations from all the proposed major energy project on Anglesey, in particular the NNB. The Vision has been developed to complement national, regional and local policies, as well as existing corporate priorities.	No change.
	4. Objectives	Agree except for Objective 1 which is superfluous.	Disagree.	No change.
	8. Population and Community	Section 4.3.6: a better view would be that the Council expects the project promoter to clearly communicate how it will manage safely the operations of the nuclear power plant following construction including any distinct differences between it and the previous Magnox Nuclear Power Station.	Comment noted. It is agreed that additional wording could be included in respect of communication.	Paragraph 4.3.6 to be amended to include reference to the need for clear communication in respect of safety management.
	9. Construction Workers	Accommodation should be of the right type for promoter and main contractors. Should be	Comments noted and are considered to	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
	Accommodation	sufficient on site to maintain security and to protect the environment, the use of existing buildings and brownfield land should also be maximised. Workers will not want to purchase, which may put pressure onto holiday lets, most attractive will be campus style accommodation. Which are suited to the larger communities such as Holyhead and Llangefni. These can deliver a legacy.	reflect the strategy set out in the draft SPG.	
		Do not agree with Topic Paper 3 reference that workers require smaller units, no precedent at Hinkley C. There is an opportunity for providing affordable housing but this should be decoupled from the construction workers accommodation. Odd that the Energy Island Programme adopts Land and Lakes in advance of SPG and first round of developer consultation.	Comment noted. Information from previous new builds suggests that the majority of accommodation will be single bed spaces. It is accepted that the mix and type of accommodation will need to be reviewed following receipt of further information on construction workers profile from the project promoter.	No change.
	15. Natural Environment	Agree with guiding principles but suggest that the developer should make best use of previously developed land which could be remediated, such as Anglesey Aluminium.	Comment noted. The SPG does include reference to brownfield/previously developed land (see, for example, GP10 and GP20).	No change.
	19. Area Guidance	Holyhead. Disagree with statements of Construction Workers Accommodation and Land and Lakes. Should be incentives to improve existing accommodation and new residential development. The type of worker accommodation proposed does not demonstrate robust arrangements from a security, amenity, transport or local community impact aspect. Is there an opportunity to use part of the Anglesey Aluminium site in combination with Lateral Power?	Comment noted. GP10 of the draft Wylfa NNB SPG does include for the establishment of a Housing/Accommodation Fund to improve the stock of existing private rented and reduce number of empty homes. This GP should be read in conjunction with Holyhead Area guidance.	No change.
A006	3. Vision	Nuclear plants should not be close to centres of population and there should be no construction	Comment noted. It is not the remit of the County Council or the Wylfa NNB SPG to	No change.

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		until there is a means of storing waste long term. The need for nuclear energy should not be at the expense of the natural environment. Biodiversity is a matter for public protection. Also no justification for endangering public health, question the level of subsidy and the issue of security.	consent or prevent the NNB, the principle of which is established in UK Government policy set out in NPS EN-6. The aim of the SPG is to ensure that the benefits of the NNB to the Island are maximised whilst minimising adverse impacts.	
	4. Objectives	We do not need nuclear power to provide energy.	Comment noted. The decision to promote nuclear power lies with the UK Government and it is not within the remit of the County Council to consider the principal of this energy source as part of the Wylfa NNB SPG.	No change.
	5. Project-Wide Guidance	Does the topic area include the risks to health of low-level radiation?	This issue is covered within paragraph 4.3.6 of the draft SPG.	No change.
	6. Economic Development	It would not benefit the local community, there is already a shortage of services which will be exacerbated. The existing cuts to services are at a time when the existing power station has been in operation.	Comment noted. The County Council will be required, once a DCO application is submitted, to prepare a Local Impact Report which will need to identify the impacts arising from the NNB which may include impacts upon local services. The purpose of the Wylfa NNB SPG therefore is to identify this matter as a potential issue and to set out the means by which the project promoter may be able to prevent, mitigate or compensate for any negative impacts, providing legacy benefits where possible.	No change.
	7. Tourism	There will be transport disruption and the visual impact of new pylons may also deter tourists.	Comment noted. The County Council is aware of the potential for transport disruption and as such seeks to prioritise rail and water-borne freight through the guidance contained within the draft SPG. The provision of power lines is not a matter	No change.

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			for the SPG and would be dealt with through a separate DCO application.	
	8. Population and Community	Negative impact on language and culture; jobs could be created in more sustainable ways.	Comment noted. The County Council is aware of the potential for the NNB to have a negative effect upon the Welsh language and culture. However, UK Government policy has identified the site at Wylfa as appropriate for a new nuclear power station therefore the Council is seeking to avoid or minimise negative effects associated with its development upon local communities, and maximise positive ones (including local job creation) through the guidance contained within the SPG, which is consistent with existing and emerging local planning policy in seeking to ensure that applicants submit evidence demonstrating how proposals have considered Welsh language and culture.	No change.
	9. Construction Workers Accommodation	It is not sustainable.	Comment noted. The County Council's approach to construction worker accommodation, which is to seek a split between tenures of 1/3, 1/3, 1/3, is considered to be one which provides the best opportunity of minimising negative effects whilst promoting positive ones. In this way it is considered sustainable. This is consistent with the Council's adopted Construction Workers Position Statement – see http://www.anglesey.gov.uk/Journals/2011/09/05/Position-Statement---Construction-Workers-Accommodation.pdf	No change.
	10. Welsh Language	Current decline in Welsh will be exacerbated by	As per response to Q8 above.	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
		the project.		
	11. Transport	Problems with construction, concern with regard to the implications of accidents and lack of suitable evacuation routes off the Island.	Comment noted. The draft Wylfa NNB SPG (see GP14) seeks to prioritise rail and water modes of transport which is expected to reduce the numbers of vehicles that may otherwise be expected during the construction process. The issue of accidents related to nuclear power and means of evacuation is the responsibility of the Office of Nuclear Regulator (ONR) which determines the off-site emergency planning area for nuclear installations where there is a potential for an off-site release of radioactivity that may require implementation of countermeasures such as evacuation. This is carried out under the Radiation (Emergency Preparedness and Public Information) Regulations 2001 (REPPiR).	No change.
	12. Utilities	Present utilities are inadequate.	Comment noted. The draft Wylfa NNB SPG (at GP15) sets out that the project promoter will be expected to undertake consultation with utilities providers with a view to ensuring that there would be no adverse impacts on utilities provision as a result of the NNB project.	No change.
	13. Waste	Careless of the County Council and Welsh Government not to be concerned about fuel stored for 160 years, what plans are available to show how waste will be stored?	<p>Comment noted. The issue of monitoring nuclear waste is something that will have to be agreed with and controlled by the regulators for the nuclear industry such as Natural Resources Wales (NRW).</p> <p>UK Government advises that the decision-maker for the main site (the Secretary of State following a recommendation from the</p>	Amend GP17 bullet point 1 to include reference to the need to identify and assess the potential effects of nuclear waste storage including associated radiological risks.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
			<p>Planning Inspectorate) should assume that the facilities for handling high-level waste can be provided and that as such, should not consider this matter further (NPS EN-6 para 2.11.4). The issue of long-term storage therefore lies outside of the remit for both the DCO process and for the Wylfa NNB SPG.</p> <p>The draft Wylfa NNB SPG does consider the issue of interim storage at GP17 and in light of comments received proposes to amend bullet point 1.</p>	
	14. Climate Change	Consideration should also be given to the impacts on climate change resulting from construction, including mining and to the impacts in the countries where these activities may take place.	Comment noted. The draft SPG does give consideration to the impacts on/of climate change (see GP18 and GP19) and includes reference to the re-use of buildings and material where possible (including Wylfa A). This would reduce the requirement for the mining of new material.	No change.
	15. Natural Environment	There appears to be no consideration (from the NPS) to the AONB and to SSSIs.	Disagree. NPS EN-6 (Volume 2) sets out the UK Government's consideration of the Wylfa site for NNB. Paragraph C9.70 states that the Government did consider the likelihood for effects upon the AONB and concluded that in view of the limited number of potentially suitable sites, the Government did not think the issues in relation to this criterion (AONB) are sufficient to justify not including the site in the NPS. Similar consideration was given to the potential for impacts upon SSSIs, notably Tre'r Gof SSSI (at C9.60).	No change
	19. Area Guidance	Rest of Anglesey. US Government recommended 50km evacuation area after	Comment noted. The issue of accidents related to nuclear power and means of	Add reference within the SPG to the legislative

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		Fukushima. This would include the whole Island. There should be a practice evacuation off the Island.	evacuation is the responsibility of the Office of Nuclear Regulator (ONR) which determines the off-site emergency planning area for nuclear installations where there is a potential for an off-site release of radioactivity that may require implementation of countermeasures such as evacuation.	procedures for emergency planning.
A007	-	Null response.	No comment.	No change.
A008: Federation of Small Business	2. SPG Purpose	Expresses reservations about safety and concerns about what sort of legacy we are leaving to future generations. Certainly, in two generations, the Island will be unrecognisable from that we see now, and perhaps even more so than envisaged by the current SPG.	Comment noted. The safety of the NNB is a consideration outside of the Wylfa NNB SPG. It is accepted that the development represents a significant change to the Island and the purpose of the SPG is to ensure that any change is beneficial to the economy and to local communities whilst minimising adverse impacts.	No change.
	3. Vision	Agree with Vision accepting that the County Council has to accept the NNB and maximise the local benefits. The Council should be prepared to argue for the best deals for the local community.	Comment noted. The purpose of the Wylfa NNB SPG is to support the Council in ensuring a legacy benefit for the Island.	No change.
	4. Objectives	Agree with objectives subject to comments listed above.	Comment noted	No change.
	5. Project Wide Guidance	Need to balance the adverse effects of NNB and the high costs incurred by local ratepayers	Comment noted. The aim of the Wylfa NNB SPG is to provide local planning guidance in order to minimise the potential for adverse effects and to suggest mitigation if such effects are unavoidable. The SPG is also intended to help the County Council, and project promoter, to identify where costs, for example new infrastructure, may be incurred and to require that such costs are met by the	No change.

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			developer (see, for example, GP23).	
	6. Economic development	The content and principles are well known, many require convincing that the Island's population will be any better in 50 years time.	Comment noted. It is not the remit of the County Council or the Wylfa NNB SPG to consent or prevent the NNB. The aim of the SPG is to ensure that the benefits to the Island arising from the NNB are maximised in order to provide for long term economic growth whilst protecting the local environment.	No change.
	7. Tourism	Content is agreed but tourism will not benefit from the project.	Comment noted. There is the potential for adverse effects upon the tourism economy arising from the NNB project. The aim of the Wylfa NNB SPG is to minimise these effects and to mitigate them where possible. GP5 and GP12 have been prepared with this aim in mind.	No change.
	8. Population and Community	There is no vision, except that NNB will be the saviour.	Disagree. As above, it is recognised that the NNB may create adverse effects upon the Island's population and communities, however the County Council is not the decision making body for the main site development. One of the key elements of the Wylfa NNB SPG is to ensure that adverse effects are minimised and mitigated.	No change.
	9. Construction Workers Accommodation	More thought should be given to re-using vacant property, or improving sub-standard properties.	Disagree. GP10 includes for the encouragement to re-use vacant buildings and reference is also made to the Housing/Accommodation fund which the County Council expects to be made available to support improvements to the quality of the private rented sector.	No change.
	10. Welsh Language	Agree with guidance but question availability of	Comment noted. GP13 lists examples of measures which could be employed to	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
	and Culture	funding.	protect and enhance Welsh language and culture and the County Council would expect that funding for any related schemes would come from the project promoter.	
	11. Transport	A new, additional road crossing of Menai Straights is vital for next 50-100 years. Update and electrify the mainline and restore the Amlwch branch line.	Comment noted. The County Council recognises the importance of transport linkages on to and off the Island. Whilst the construction of a new bridge and electric upgrade of the mainline may be considered desirable, neither are something which can be required of the project promoter by the Wylfa NNB SPG.	No change.
	12. Utilities	Upgrade but caution over who will pay the cost.	Comment noted. GP15 states that the County Council expects the project promoter to work with utilities providers to ensure that upgrades are provided where required.	No change.
	13. Waste	Question who will pick up the cost of dealing with household/domestic waste generated by workers. Little discussion on control and cost of commercial waste and nuclear waste is not dealt with in a (re)assuring manner.	Paragraph 4.8.4 of the draft Wylfa NNB SPG states that it is the County Council's understanding that current municipal collection services have the capacity to cope with the extra demand. Notwithstanding, GP16 requires the project promoter to minimise waste arisings both in connection with the main site but also with associated developments. Paragraph 4.8.5 states that the Council is not statutorily responsible for the treatment and disposal of commercial waste therefore the extent that it can require the project promoter to undertake certain activities in this regard is limited. However, as noted above, the Council does require	No change.

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			<p>that techniques are employed to minimise the amount of waste generated.</p> <p>Furthermore, should any additional facilities be required by waste companies employed to handle the commercial/industrial waste, then this will in itself be the subject of planning applications to the Waste Planning Authority.</p> <p>NPS EN-6 sets out what the Council can and cannot consider with regard to nuclear waste. The SPG cannot stray beyond existing policy.</p>	
	14. Climate Change	Agree with the guidance but question whether nuclear is the answer to the problem facing the world.	Comment noted. The UK Government considers that nuclear power represents a low carbon technology and this is set out within NPS EN-6 at paragraph 1.1.1.	No change.
	15. Natural Environment	Question how the opposition to power lines is being addressed and that any new lines should be underground.	Comment noted. Any requirement for new power lines would be the subject of a separate application. This would most likely be in the form of a separate DCO application to the Secretary of State and in consequence, is not within the scope of the Wylfa NNB SPG.	No change.
	16. Historic Environment	Insufficient consideration of historic landscapes and views and the threat posed by industrial development. Developers must not spoil what we have here.	<p>Comment noted. In accordance with existing and emerging national and local planning policy, guidance contained in the Wylfa NNB SPG requires that when preparing their applications, developers should provide due consideration to all aspects of the historic environment.</p> <p>GP22 includes reference to historic landscapes. Reference to setting is also made although the importance of views</p>	Include reference to the importance of views to certain historic features within GP 22.

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			could also be included within the guidance.	
	17. Facilitating Development	Question whether the County Council can provided the resources appropriate to GP23 and GP24.	Comment noted. The County Council anticipates that the costs of monitoring will be funded by the project promoter. Similarly, costs incurred by the Council when using its statutory powers will be funded by the project promoter.	No change.
	18. Implementation and Monitoring	Considers that the County Council is not sufficiently powerful to fight UK Government and big business.	Disagree. The County Council will be the statutory decision maker in respect of development associated with the NNB (subject to call-in or appeal) and it also has a statutory role within the DCO process for the main site. As such, the County Council believes that it can have a significant influence on the NNB project.	No change.
	19. Area Guidance	Asks what plans are in place for evacuation in the event of an incident.	<p>In the UK the ONR determines the off-site emergency planning area for nuclear installations where there is a potential for an off-site release of radioactivity that may require implementation of countermeasures such as evacuation. This is carried out under the Radiation (Emergency Preparedness and Public Information) Regulations 2001 (REPPIR).</p> <p>In January 2014, ONR published revised principles for determining REPPIR off-site emergency planning areas around nuclear licensed sites in the UK. This means that ONR considers local practical and strategic factors associated with implementing the plan when they determine the area. More information on the process used by ONR is available by visiting http://www.onr.org.uk/depz-onr-</p>	Add reference within SPG to the legislative procedures for emergency planning.

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			<p>principles.htm.</p> <p>Upon notification by ONR of the area requiring an emergency plan, the County Council consults all of the agencies with a role to play in its implementation.</p> <p>Following consultation with the relevant agencies and the operators, the County Council has to produce its off-site emergency plan within 6 months. The plan will consider a range of countermeasures proportionate to the risks identified, including sheltering or evacuation. The plan will be tested in an emergency exercise that includes the Local Authority, the police, the regulator, the met office, public health bodies and other agencies that would be involved in an event. Decision to evacuate or shelter would be taken based on the specific factors presented on the day.</p> <p>The Local Authority Emergency Plan will be considered every three years, following the operator's identification of hazards on site and the risks they present to the public, or when the operator makes a material change to activity on the site. This means that any changes associated with nuclear new build will be considered under REPPiR.</p>	
A009	3. Vision	The County Council should be transparent in its dealings with Horizon. Furthermore, there is already consultation fatigue with all developments coming forward and the SPG is too long to be able to make meaningful comment	Comment noted. The County Council provides regular updates via committees and newsletter with regard to its discussions with the project promoter. The Council recognises that the Wylfa NNB	No change.

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		in time allowed. Nuclear waste which is important, is lacking in coverage.	<p>SPG is a long document but this reflects the wide range of topics that require consideration and the importance which the Council places upon having comprehensive policy guidance coverage.</p> <p>The Council recognises that nuclear waste is important. However, the SPG can only provide local interpretation and guidance on existing policy and the relevant policy concerning nuclear waste is set by UK Government. NPS EN6 (at paragraph 2.11.6) states that: <i>'The UK has robust legislative and regulatory systems in place for the management (including interim storage, disposal and transport) of all forms of radioactive waste that will be produced by new nuclear power stations. The IPC should act on the basis that the relevant licensing and permitting regimes will be properly applied and enforced'</i>.</p>	
	13. Waste	<p>Lack of clarification over responsibility for identifying contaminated land and level of monitoring required. Lack of evidence of risk assessment and resource planning.</p> <p>No explanation for long-term disposal of high level waste. Reference to Cumbria's refusal to accommodate high level waste should prompt Anglesey into stating that either a second application may be submitted to host the waste at Wylfa or that it will actively oppose being the UK's permanent Geological Disposal Facility.</p>	<p>Comment noted. The issue of monitoring nuclear waste is something that will have to be agreed with, and controlled by, the regulators for the nuclear industry such as Natural Resources Wales (NRW).</p> <p>Comment noted. UK Government advises that the decision-maker for the main site (the Secretary of State following a recommendation from the Planning Inspectorate) should assume that the facilities for handling high-level waste can be provided and that as such, should not consider the matter further (see NPS EN-6 para 2.11.4). The issue of long-term storage therefore lies outside of the remit for both the DCO process and for the Wylfa NNB SPG.</p>	<p>No change.</p> <p>No change.</p>

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
	15. Climate Change	No specific consideration for human rights, and the rights of future generations to be left with 'the clean up'. Also raises the concept of inter-generational equity and the issue of human rights and uranium mining.	<p>Notwithstanding, the County Council has previously stated that it opposes proposals for a GDF (see http://www.anglesey.gov.uk/empty-nav/news/press-releases-2014/april-2014/anglesey-will-not-accept-nuclear-waste/122675.article)</p> <p>Comment noted. The issue of responsibility for long-term nuclear waste storage and the extent to which the Wylfa NNB SPG can consider it is set out above.</p> <p>The issue of human rights and uranium mining lies outside the scope of the SPG.</p>	No change.
A010	Questions 2, 3, 4.	Support is provided for first three questions, no specific comment.	No responses required	No change.
A011: Welsh Water	11. GP15	<p>AMP investment is regulated by OFWAT and Natural Resources Wales both in terms of the amount of funding and the timing of the planned regulatory work. There may be instances where developers' needs do not coincide with the timing of planned investment. In such circumstances where infrastructure improvements would be required prior to any planned investment we would look at other mechanisms to fill this funding gap such as developers' contributions through planning obligations.</p> <p>Once the exact locations and densities of proposed allocations and associated development are confirmed we will assess the impact of the potential developments upon our assets, and advise accordingly. Welsh Water will maintain dialogue with the Local Planning Authority through the Anglesey & Gwynedd Joint</p>	<p>Comment noted. GP15 requires that the project promoters work with utilities providers such as Welsh Water to ensure that any requirements for new infrastructure or upgrades of existing are agreed. GP23 sets out the County Council's expectations for project promoters to enter into planning obligations. The supporting text identifies water supply and waste water treatment as infrastructure where contributions are likely to be sought.</p> <p>Comment noted. The County Council welcomes Welsh Water's proposed approach to assessing potential impacts arising from the NNB project on water supply infrastructure.</p>	<p>No change.</p> <p>No change.</p>

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
		Local Development Plan process to assess infrastructure capacity for proposed growth areas.		
	16. GP 23	The guidance states that the County Council will expect a comprehensive scheme of measures to mitigate and compensate for the impact of the Wylfa NNB project. These measures would be delivered through planning conditions and obligations as appropriate. The supporting text states that such measures can include the provision of, and contribution towards, essential infrastructure necessary to support the Wylfa NNB project including water supply and waste water treatment. There may be instances where infrastructure improvements would be required prior to any planned investment by Welsh Water and we would look at other mechanisms to fill this funding gap such as developers' contributions through planning obligations. As such we support the provisions of this guidance.	Comment noted.	No change.
	17. Locational Guidance: Holyhead and Environs	Page 108 of the draft Wylfa NNB SPG states that investment may be required at Holyhead WwTW for a new storm overflow chamber/tank, however it cannot be ascertained what infrastructure improvements may be needed to accommodate development until such time as the location and densities of proposed developments are known, as such we would request that the sentence containing this information is removed from the policy.	Agreed.	Text to be removed as per the response.
	Amlwch and Environs	The utilities heading on page 119 states that "It has been previously noted that there are sewerage issues in the local area and without investment in these infrastructure it is unlikely to be possible to accommodate additional	Agreed.	Text to be removed as per the response.

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		development.” There are no major issues with the sewerage system in Amlwch therefore we would recommend that this sentence is deleted. We can assess the impact of any proposal on our infrastructure once the location and size of any proposed development is known.		
	A55/A5 Corridor	<p>The utilities heading on page 125 states that Llanfairpwll wastewater treatment works is considered to be operating close to its volumetric capacity and therefore is unlikely to be able to accommodate future development within the existing sewerage network. Whilst it is correct that the wastewater treatment works is operating close to its volumetric capacity, this does not necessarily mean that the catchment cannot accommodate any more growth. We would recommend that the wording “and therefore is unlikely to be able to accommodate future development within the existing sewerage network” is replaced with the wording “the project promoter should enter into early discussions with Welsh Water in respect of any development proposals within the catchment of Llanfairpwll wastewater treatment works” as included within the wording of policy GP30.</p> <p>In addition, the catchments of Valley, Gaerwen and Llanfairpwll wastewater treatment works have experienced sewer network flooding incidents therefore we would recommend that this information is included in the SPG to maintain consistency with the advice provided for other settlements in the locational guidance chapter.</p>	Agreed.	Wording to be amended to reflect this response.
A012	Null response		No response required	No change.

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A013	Questions 2-19	Replies 'yes' to all questions, no specific comment.	No response required.	No change.
A014	2. SPG Purpose	Agrees with 'Purpose', no specific comments.	No response required.	No change.
A015	Questions 2-10	Agrees, no response to remaining questions. Cautions that tourism is vital to Anglesey and that clear plans should be in place to minimise disruption from construction traffic.	<p>Comment noted. The County Council recognises the importance of the visitor economy to Anglesey and the sensitivity of that sector in the context of the NNB project. The Council has therefore prepared two GPs to address specific issues relating to tourism and the visitor economy (GP5 and GP12).</p> <p>With regard to the potential for impacts arising from construction traffic, the Council expects the project promoter to prioritise the use of rail and water as transport modes. In addition, Transport Plans, Travel Plans and Traffic Management Plans will be required. Further, the spatial strategy as set out within the Development Plan, and reflected in the draft SPG, seeks to locate associated developments in accessible locations. With these measures in place, the County Council believes that the potential for congestion to occur and cause disruption to visitors and tourists could be minimised.</p>	No change.
A016	3. Vision	The plant is too close to Cemaes Bay and health impairments will increase.	Comment noted. The location of the main site has been determined by the UK Government. The County Council's ability to influence its location therefore lies outside the scope of the Wylfa NNB SPG. However, the draft SPG includes specific guidance which is designed to minimise adverse health impacts arising from the	No change.

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			NNB project (see GP7).	
	4. Objectives	See above.	As above.	No change.
A017	9. Construction Workers Accommodation	There is sufficient unoccupied accommodation on Anglesey. Where possible, local people should be used during the construction process.	<p>Comment noted. The County Council is keen to encourage the re-use of existing vacant properties to minimise the requirement for new build and specific reference to this is made within GP10 of the draft Wylfa NNB SPG.</p> <p>The NNB project has the potential to provide a significant number of jobs which the Council believes should be available to the local community. As such the draft SPG contains a number of GPs which are designed to maximise the economic opportunities available to local people. These GPs include GP1 and GP2 in particular.</p>	No change.
	20. A5025 Corridor	The A5025 is not suited for large commercial vehicles due to its size and the fact that it travels through many small villages, most of which have schools and a considerable population of elderly people. Care must be taken in this area.	Comment noted. The County Council recognises the character of the A5025 is such that significant increase in traffic could pose an issue to local communities (it is one of five key issues identified within the supporting text to GP31). Highways locations which may require upgrading are also identified within the Area of Search whilst the Council's overall approach to transportation is to require a prioritisation of rail and water above road for the movement of freight.	No change.

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A018: Betsi Cadwaladr University Local Health Board	4. Project Wide guidance	Betsi Cadwaladr University Health Board welcome the introduction of Population and Community topic area within the Project-wide guidance, in particular the “Health and Wellbeing” agenda.	Comment noted.	No change.
	5. Guiding Principles	Welcome reference to the Community Facilities and Services agenda, and the clear reference to Health and Wellbeing as noted within NPS EN-6 Section 3.11: “The Nuclear AoS also identified that there could be positive effects for health and well being resulting from the positive socio-economic benefits of new nuclear power stations”. It will be important to have open engagement with residents about any positive and negative impacts which are perceived to be associated with this type of development.	Agreed. GP7: Protecting Health of the draft Wylfa NNB SPG requires the project promoter to work with the Local Health Board to identify potentially significant health impacts and appropriate mitigation. This is to include the provision of information to residents and visitors which, the County Council expects, would include information on the potential positive and negative impacts associated with the NNB. Paragraph 4.3.6 also makes specific reference to the need for the project promoter to communicate risk associated with radiation to the Island’s communities.	No change.
	7. Population and Community	Welcomes the reference to the Community Facilities and Services agenda, and the clear reference to Health and Well-being. Note and support the clear link to NPS EN-6: Section 3.11.	Comment noted	No change.
		Welcomes the clear reference to population, health and wellbeing, in particular reference to GP7 – “Protecting Health”.	Comment noted.	No change.
		Notes reference to NPS EN-6, and wishes also to reference section 3.12.5 of this referenced document. “In common with other major industrial processes, the construction, operation and decommissioning of new nuclear power stations could affect health care provision. For example, the facility could increase demand on	Comment noted. The potential for increased demands upon existing health care provision and monitoring services is recognised within the draft SPG (see, for example, the fourth bullet point at paragraph 4.12.3 and the related GP23). Whilst GP25 does not make specific reference to what should be monitored	No change.

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		health monitoring services.” Wishes to include section 3.12.5 of NPS EN-6 as an action point within the drafted consultation in order to address potential mitigation measures of the proposed NNB.	during construction and operation, the County Council is of the opinion that health should be one such matter.	
A019: Natural Resources Wales	SPG Principles	The Wylfa NNB SPG needs to address design and siting principles in a context appraisal for protected areas and protected landscapes in more detail i.e. detailing the types of mitigation that will be sought and design principles such as use of green roofs on associated development.	Comment noted. The draft Wylfa NNB SPG sets out within GP20 the requirement to conserve and enhance the natural environment. With regard to mitigation, the draft SPG sets out eight examples of potentially suitable mitigation but the County Council does accept that these do not relate explicitly to design principles. Whilst the Council is of the opinion that the draft SPG should not be too prescriptive, it could include the importance of design principles focussed upon the natural environment as an additional bullet point.	Bullet point to be included within GP20 which references the adoption of good design principles as a means of reducing impacts upon protected areas and landscapes.
	Objective 7	NRW welcomes inclusion of this objective.	Comment noted.	No change.
	GP14	Should include reference to a Green Travel Plan for Wylfa.	Agreed. GP14 makes reference to a Transport Plan which could include ‘green initiatives’. However, it is accepted that explicit reference to Green Travel Plans could be included.	Include reference to Green Travel Plan within GP14.
		The document should identify spatial areas of planning gain and emphasise environmental projects that could benefit from a community fund.	The draft Wylfa NNB SPG sets out an expectation that the project promoter will mitigate and compensate for any adverse effects and that this may be delivered via Planning Obligations. The establishment of a separate community fund is a separate issue which would take place outside of the planning process and reference is made within paragraph 4.12.5 to the proposed Community Benefit Contributions which the	No change.

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			County Council intends to operate. There is potential for the CBC to include environmental projects.	
		Not clear how much weight will be given to the SPG and which local planning document it is designed to support given the emerging JLDP is not adopted.	The weight to be attached to the Wylfa NNB SPG will be determined by the relevant decision maker. However, the SPG will be a material consideration for the County Council when it is considering Town and Country planning applications for associated developments.	No change.
			The SPG principally supplements the existing Local Plan and NPS and not the JLDP (which is still in preparation). Further information on the relationship between the SPG, adopted and emerging plans is provided within Section 1.2 of the draft SPG.	
	GP 20	Greater clarity would be provided by the addition of sub-objectives relating to the need to maintain and enhance ecological capacity and function and also the need to maintain and enhance soils and soil functions.	Comment noted. It is considered that the concept of ecological capacity is difficult to accurately define and measure and that as such it would not be appropriate for consideration within the Wylfa NNB SPG.	No change.
			Within GP20, the draft SPG recognises the importance of avoiding loss of best and most versatile land and notes that one way to achieve this is to maximise development on previously developed land thereby maintaining soil functions.	
	GP26	In GP26 the need for the Wylfa development cannot be questioned as it is established by NPS EN-6. Consequently, IROPI cannot be questioned in regards of HRA. As the integrity of European sites could be adversely affected, the need for compensatory measures should be set	Comment noted. GP26 does not question the need for the project (paragraph 5.1.9). Bullet point four lists a requirement for mitigation but does not reference the possible requirement for compensation.	Amend GP26, fourth bullet point to include reference to the need to compensate for significant effects upon the integrity of European protected site if such effects

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		out in the SPG, separate from mitigation.		cannot be avoided through mitigation.
		The SPG should make clear that the EIA for the Wylfa site should be presented for the Wylfa project as a whole, which should include an assessment of the effects from associated development linked to the Wylfa project, including grid connection infrastructure, access infrastructure, etc.	Disagree. As associated development applications may come forward independently of the DCO application (and be submitted by promoters other than Horizon), it is not considered appropriate for the SPG to stipulate that EIA should relate to the Wylfa NNB project as a whole. However, whilst the draft SPG makes clear the importance of considering cumulative impacts, it is considered that clear reference could be made to the need to consider cumulative effects arising from the various components of the project itself.	Reference to be included at paragraph 4.1.4 to the need to consider the cumulative effects of the main site, associated developments and any developments proposed by third parties.
		Further clarity sought on what assessment (including impacts on designated sites) has been made of the water supply for the proposed Wylfa project.	Comment noted. The County Council commissioned a Water Cycle Study which reported in 2013 and which informed the Infrastructure Topic Paper. It is presumed that the project promoter, in liaison with Welsh Water have/are commissioning assessments on the potential impacts arising from increased water demand upon designated sites. The Council presumes that the results of such studies will be made available as part of the PAC1 consultation.	No change.
	Areas of Search	The SPG refers to several Areas of Search where some associated development (construction workers accommodation) could be appropriate on the fringe of settlements. Clarity sought as to how this would be consistent with the emerging JLDP strategy.	Comment noted. The approach to the location of construction worker accommodation in Amlwch, Holyhead and Llangefni follows Strategic Policy PS3 of the JLDP Preferred Strategy. This sets out that most new development will take place within, and on the fringe of, these Urban	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
	Definition of scale of development	The definition of small scale development needs to be clarified. Development of up to 50 residential units is not considered to be small scale. Major development is defined as 10 residential units or more in Development Management Procedure Order Wales 2012.	Service Centres. Disagree. The Development Management Procedure Order Wales 2012 defines development as 'major' for the purposes of administering and processing planning applications. Reference to 'small' and 'large' scale development within the context of the Wylfa NNB SPG is linked to the definitions applied within the County Council's extant Interim Planning Policy Large Housing Sites. This states that applications for 50+ dwellings will be considered to fall within the definition of 'large' or, at paragraph 14, 'major'. The SPG is therefore seeking to recognise the distinction currently made within the extant policy between sites above and below 50 units. To be consistent with the interim policy, the figure of 50+ for the definition of large was adopted within the draft SPG. Consideration was given to defining development below 50 as 'medium' but this then implied that there should be a further category of 'small'. The inclusion of a third category would not be supported by current adopted plan policy and therefore the SPG should restrict itself to development above and below 50 dwellings.	No change
	Transmission infrastructure	The guidance states that the Wylfa NNB SPG does not provide guidance to development related to connection of the electricity transmission infrastructure. However, the guidance should highlight that the Wylfa project will need to address the in combination and cumulative impacts of the Wylfa project together with associated grid infrastructure and also other	Agreed. Paragraph 4.1.4 (which deals with cumulative impacts) could be amended further to include reference to electricity transmission infrastructure as an example of other cumulative/in combination development.	Amend paragraph 4.1.4 to also include reference to transmission infrastructure.

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		major development.		
	Transmission infrastructure	Whilst para. 1.2.1 of the draft SPG refers to its purpose to provide advice on direct and indirect matters, para. 1.1.12 states that this SPG would not apply to grid connection infrastructure. The SPG should also clarify that indirect impacts from grid connection should be considered by the County Council in order to make an informed response in its Local Impact Report and the HRA/EIA process too.	Comment noted. Section 4.9 of EN-1 sets out UK Government policy with regard to the consideration of electricity generating infrastructure and the related grid connection. It states that the submission of a joint application, or applications in tandem, is appropriate but recognises that this is not always possible and that in such circumstances some information on the connection should be provided and the reasons for not submitting an application in tandem explained.	SPG to accept that it is not always possible to submit a single or tandem applications to include the main site and its grid connection but to recognise, within GP20, that some information may be required in order to understand the cumulative effect of the developments, particularly upon the natural environment.
	Aims and Objectives	One of the stated aims of the SPG is to inform the Local Impact Report and SOCG. NRW suggest that the SPG also includes a stated aim to inform pre-app discussions for both the Wylfa project and its associated development.	Agreed. Paragraph 1.2.2 sets out four aims for the Wylfa NNB SPG. The aims could be extended, or supporting text modified, to include reference to pre-application discussions.	Paragraph 1.2.2 to be amended to include reference to pre-application discussions.
		PPW does not class nuclear as low carbon, PPW has been updated.	Comment noted. It is accepted that PPW Edition 6 (at paragraph 12.8.7) states that planning policy does not include nuclear as low carbon. However, UK Government policy is clear that nuclear is a form of low carbon technology.	Paragraphs 2.2.1 and 2.2.2 to be amended to reflect PPW Edition 6 and to remove reference to low carbon.
	4.9.9	Guidance should be provided on habitat improvement.	Disagree. It is considered that the provision of guidance on habitat improvement would take the Wylfa NNB SPG into a level of detail that is not appropriate.	No change.
	4.12.2	Reference to 'Development Consent Orders'.	Agreed. The draft Wylfa NNB SPG currently references 'Development Consent requirements'. Accepted that this should be amended to include 'Order'.	Amend paragraph 4.12.2 to state 'Development Consent Order requirements'.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
	4.12	Local Development Orders could be used as an appropriate mechanism in locations such as business parks.	Comment noted. The County Council may consider the adoption of LDOs in appropriate circumstances. However, this is outside the scope of the Wylfa NNB SPG.	No change.
	GP26-33	Use of terminology regarding European sites – the correct wording should be ‘if a proposal either alone or in combination gives rise to a likelihood of significant effects then an Appropriate Assessment will be required. GP 26 should also make reference to protected species and ancient woodland. Reference should also be made to the Wales Coastal Path.	Agreed. The draft Wylfa NNB SPG can be amended to include the wording provided by NRW in respect of Appropriate Assessment. GP26 could include reference to Ancient Woodland and the Wales Coastal Path.	GP26 to be amended to reflect the suggested wording in this response. GP26 to be amended to include references to Ancient Woodland and the Wales Coastal Path.
	Open space	Reference could be made to the natural greenspace toolkit prepared by former CCW. Terms such as blue and green infrastructure should be included within the Glossary.	Disagree. The Green Space Toolkit is designed to help local authorities improve and plan green areas within towns and cities and as such it not considered a development management tool. The draft Wylfa NNB SPG contains a list of abbreviations which is considered sufficient.	No change.
A020: Environmental Health	Health and Wellbeing, Air Quality, Noise and Housing.	Broadly satisfied that the Wylfa NNB SPG will seek to ensure that these issues will be addressed but make observations. It is important to ensure that the SPG’s aims and objectives are realistic. Inevitable with a project to this size that issues with regard to air pollution, noise and housing will give rise to certain difficulties. Care should be taken when using statements such as “maintains and enhance” or “conserve or enhance”. Indeed, where individual objectives are discussed in more detail later in the document mention is made of “minimising the release of potentially	Comment noted. Comment noted with regard to the use of phrases such as ‘maintains and enhances’ and it is understood that such a desired objective may not always be achievable. However, the purpose of the Wylfa NNB SPG is to set out what the project promoter should aspire to aim for and in this context the wording of the objectives is considered to be appropriate. Where the project promoter, and due consideration and	No change. No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
		polluting substances” which is a better approach.	assessment, conclude that the NNB project will not maintain or enhance, then individual GPs set out a requirement for mitigation and compensation.	
	4.1.1, GP7 and 20	Agree with the requirements set out within these paragraphs.	Comment noted.	No change.
	GP21	The SPG should recognise that some of the Island’s properties are on private ground water supplies and mitigation/compensation measures should be put in place if supplies are interrupted temporarily or indefinitely.	Agreed. The draft Wylfa NNB SPG does not make explicit reference to private water supplies, particularly those associated with domestic use.	Amend GP15 to include reference to the need to protect private water supplies, or to provide satisfactory, alternative supply.
	GP24	May wish to have regard to the Power of Wellbeing contained within the Local Government Act 2000.	Disagree. The list of powers in GP24 is expressly not exhaustive and it is not considered necessary to add specific reference to this legislation.	No change.
	4.3.7	Disagree with phrase that Anglesey residents are generally healthy and the response references the document <i>“Trends in mortality and life expectancy in the Isle of Anglesey”</i> .	Disagree. The majority of residents in Anglesey do describe themselves as ‘healthy’. The 2011 Census found no Anglesey Lower Super Output Areas within the 10% most deprived for health with 78.6% describing their health as ‘Good’ or ‘Very Good’. <i>“Trends in mortality and life expectancy in the Isle of Anglesey 2011”</i> uses mortality data up to 2009. Mortality rates may not accurately reflect people’s perception of their feeling of healthiness. That said, the document does compare ‘healthy life expectancy’ and it identifies a slight increase between the period 2001-2005 and 2005-2009. Notwithstanding the above, it is recognised that the relative health of Anglesey is lower compared to	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
			many other Welsh local authorities.	
	4.3.12	Reference fuel poverty and transport costs associated with rural living.	Agreed. It is recognised that fuel poverty and transport costs can affect some of the Island's communities.	Include reference to fuel poverty and transport costs within supporting text to GP9.
	GP10	The Local Authority has implemented an additional licensing scheme for houses in multiple occupation (HMO). You may wish to recognise that the local authority would encourage the provision of good quality HMOs as an additional option for worker accommodation within GP10.	Comment noted. GP10 includes reference to improving the private rented sector, in quality and quantity and it is considered that this covers sufficiently the comment made in this response.	No change.
	5.2.3	Mention that Holyhead is the most deprived town in North and Mid Wales. Rhyl ranks higher. However, many of Holyhead's wards consistently rank highest across the various subject Welsh Index of Multiple Deprivation indices in Anglesey apart for access to services. In addition to those mentioned, this also includes health, education, physical environment and community safety.	Agreed. The SPG recognises that Holyhead includes the Island's most deprived wards however, it is necessary to amend the factual inaccuracy in respect of Holyhead being the most deprived town in North and Mid Wales.	Amend 5.2.3 to include reference to poor performance of wards in relation to health, education, physical environment and community safety and also amend text to state that Holyhead is ' <i>one of the most deprived towns in North and Mid Wales</i> '.
	5.3.2	Health is also an issue in Tudur.	Agreed. In the Welsh Indices of Multiple Deprivation 2011 Tudur is recorded as having the highest level of deprivation (health) in Anglesey.	Include reference to relative poor levels of health in Tudur at 5.3.2.
	5.4.3	Mention is made of Amlwch Port. Dispute the claim that housing and access to services are the primary concern as there are other areas such as employment, education, which rank higher. On page 133 55bB should be 55dB.	Agreed. The draft Wylfa NNB SPG states that housing and access are particular issues (but infers that they are not the only ones).	Amend 5.4.3 to include reference to employment and education. Amendment on page 133 to 55 dB.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
	Box 3.1	States that “the private rented sector includes for the greatest number of unfit properties...” Incorrect, the private sector housing survey 2008 states at 4.1.14 that the “highest rates of unfitness are associated with the private-rented sector, with flats in converted buildings and with pre-war housing”. You may wish to note that unfitness rates have declined significantly from 4.3% in 1996 to 2% in 2008.	Comment noted., although the County Council does not intend to update the Housing Topic Paper (to which this comment relates).	No change.
A021: Housing Services	2. SPG Purpose	Agrees with purpose and is fully supportive of the importance of the SPG in addressing the housing consequences of the NNB.	Comment noted.	No change.
	3. Vision	Agrees with Vision and from a housing perspective, considers that the investment associated with the project offers the opportunity to kick-start the development of new homes and assist with associated infrastructure to create sustainable communities.	Comment noted.	No change.
	4. Project-wide Guidance	Suggestion that because of the relevance of housing to the objectives, Objective 4 could be re-worded to state: Objective 4 To ensure that Wylfa NNB project maintains and enhances the quality of life (including health, housing, wellbeing and amenity) of the Island’s residents, visitors and workers during its construction and operation).	Comment noted. Whilst housing can affect a resident’s quality of life, it is an indirect effect (i.e. poor quality housing can affect health, wellbeing and amenity). As such no change is proposed.	No change.
	9. Construction Workers Accommodation	Agree with principal, suggests improvement because the implications extend beyond short term provision of workers accommodation to the housing implication of for the island’s population as a whole. Therefore suggests GP10 it is re-titled Construction Workers’ Accommodation and Local Housing Need.	Agreed. GP10 discusses the potential which the NNB project has to affect the local housing market, the needs and requirements of local residents. It is therefore considered appropriate to amend the title along the lines suggested.	Amend GP10 to ‘Construction Worker Accommodation and Anglesey’s Housing Market’.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
		<p>The guiding principles, GP10, correctly capture the standards which need to be applied to special purpose worker accommodation. In relation to the requirement proposed that the project promoter should provide a Construction Worker Accommodation Strategy, it should be stated that this should take into account evidence and research into the housing market already undertaken by the County Council.</p>	<p>Agreed. The County Council commissioned a report which considered the potential effects of the NNB project upon the housing market and recommended approaches to mitigate effects and provide a longer-term positive legacy. Many of the recommendations are contained within the draft Wylfa NNB SPG but it is accepted that it may be helpful to signpost the research.</p>	<p>Include reference to recent County Council research into the potential implications arising from the NNB project on the housing market.</p>
		<p>Endorses the view that “a housing legacy” should be an important outcome of the project and that while concerns about the pressures that an influx of workers may put on local housing supply and prices are commonly raised, this can be managed by the proposals, including the Housing Hub, suggested.</p>	<p>Comment noted.</p>	<p>No change.</p>
		<p>Regarding GP11, this proposal will be beneficial both to the promoter and Anglesey residents. Clarification is needed as to whether “establishment of a Housing Advice Service” is an addition to the proposal for a Housing Hub or the same thing.</p>	<p>Comment noted. It is envisaged that the Housing Advice Service will form part of the services provided within the Housing Hub.</p>	<p>No change.</p>
<p>A022: Conygar Wales</p>		<p>Urges the Council to provide more specific planning guidance on a number of proposed developments which have the potential to make significant contribution to the economic success of the Wylfa NNB:</p>		
		<p>Parc Cybi: Well placed to accommodate tier 1 and 2 suppliers but requires ‘pump priming’ to develop the type of accommodation required. It is also well located to accommodate a strategic logistics centre serving the NNB. Development beyond the truck stop and logistics hub may</p>	<p>Comment noted. Parc Cybi is an Enterprise Zone site (EZ2). The County Council’s ability to respond flexibly to development on the land is framed within existing, adopted planning policy. This is reflected within the guidance provided</p>	<p>No change.</p>

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		require the Council to adopt a more flexible and responsive approach to development which could be reflected in the Wylfa NNB SPG.	within the draft Wylfa NNB SPG. GP27 encourages the project promoter to consider how associated developments can support the EZ sites within the context of existing policy.	
		Holyhead Port: Reference to the Topic Paper which is considered to be focussed too much on road travel, when deliveries by sea are considered more sustainable. Lack of SPG focus on the Port is a major concern, compounded within the Infrastructure Topic Paper (see Table 3.1 which contains no reference to investment in sea transportation). The Wylfa NNB SPG should identify the Port as a fundamental infrastructure need.	Comment noted. The draft Wylfa NNB SPG recognises the importance of Holyhead Port, but in response to this and other comments raised during consultation, the importance of the Port to the economy will be strengthened. GP27 identifies a requirement upon the project promoter to investigate use of the Port for the transportation of construction materials and elsewhere, the SPG prioritises the use of rail and water over road.	Strengthen reference to the Port of Holyhead where appropriate.
		Holyhead Waterfront: supports SPG requirement that a significant amount of construction worker accommodation be provided within new open market rented accommodation. The recently approved Waterfront development provides an accommodation opportunity. Long term the Waterfront development will provide a form and standard of accommodation not currently available in the market and act as a catalyst for regeneration.	Comment noted. In addition to comment raised the SPG will be updated to record the success of the Vibrant and Viable Places bid.	Update SPG to reflect success of Vibrant and Viable Places bid.
A023: Meyrick Estate	Area Guidance: A5/55 Corridor	The SPG should make reference to the potential for brownfield quarry voids along the corridor with good accessibility to the A55 to accommodate NNB related temporary or permanent development in a visually contained setting.	Comment noted. The Wylfa NNB SPG is supportive of associated development alongside the A55 provided that it complies with current adopted planning policy. As such, most types of development should be focussed within defined settlement boundaries. Freight logistics may be appropriate on the brownfield sites in question provided that they comply with the	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
	Area Guidance: Rest of Anglesey	SPG should highlight opportunities for technology related development at the Anglesey Circuit involving re-us of buildings and utilisation of the motor racing circuit and its curtilage. This would bring economic benefit to south west of Anglesey. GP33 should be amended accordingly.	relevant bullet points within GP30 and with current adopted planning policy. The policy guidance contained within GP33 Employment is considered sufficient with respect to the Anglesey Circuit and its potential to contribute to the NNB project.	No change
A024: Anglesey Economic Regeneration Partnership	Purpose and Objectives	SPG forms a sound and comprehensive document that the purpose and objectives are clearly defined and agree with the Vision. Comments made are on the SPG and Topic Papers and there is a comment that the Topic Papers would benefit from the identification of more issues and recommendations.	Comment noted. It is not the County Council's intention to update the Topic Papers which were used to inform the draft SPG only.	No change.
	Tourism	Considered that Tourism warrants its own Topic Paper. SPG should include reference to 'Welsh Government Strategy for Tourism Partnership for Growth 2013-2020.	It is not considered necessary to prepare a further topic paper on tourism as this is captured in the context of the wider economy within Topic Paper 4: Economic Development. It is agreed that Partnership for Growth: The Welsh Government Strategy for Tourism 2013-2020 could be referenced in Section 4.2 of the draft SPG.	Reference to Partnership for Growth: The Welsh Government Strategy for Tourism 2013-2020 to be included in Section 4.2.
	Displacement	Concerned about displacement of jobs and homes and considers that this should be given greater attention within the SPG with firm recommendations for mitigation.	Disagree. The draft Wylfa NNB SPG contains specific guidance that is designed to minimise adverse impacts on the local housing market and generate legacy benefits (see GP10) and to maximise local employment opportunities (GP1 and GP2). It is not clear from this response how the guidance could be strengthened in this	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
	Accommodation	Considers this requires strengthening within SPG. Concerns about displacement of current housing stock and recommends greater consideration of visitor economy and more reference to tourism accommodation.	regard. Disagree. The draft Wylfa NNB SPG includes specific guidance at GP10 which seeks to manage impacts on the local housing market. GP5 and GP12 also consider specifically the visitor economy and tourism accommodation. It is not clear from this response how this guidance could be strengthened.	No change.
	Job Creation and Skills Supply Chain	Importance of promoting STEM subjects should be given greater prominence in the SPG. Measures should be put in place to ensure that schools and colleges have structure in place to provide the best opportunities. Also need measures to support local skills now and for future generations. SPG should require early, meaningful dialogue between developer and training providers to ensure correct skills training is in place in sufficient time.	Comment noted. It is considered that GP2 provides sufficient guidance to maximise local accessibility to jobs and skills development. However, it is agreed that GP2 should explicitly require early dialogue between the project promoter and training providers and that reference could be made to the promotion of STEM subjects.	Amend GP2 to refer to the need for early dialogue between the project promoter and training providers and the promotion of STEM subjects.
	Community Benefits	Post-build legacy benefits are not mentioned, making informed and integrated decisions could lead to positive post-build legacy opportunities. SPG should refer to the £7.5m Holyhead: Realising Sustainable Community benefit bid (now successful).	Disagree. A central aim of the Wylfa NNB SPG is to realise lasting legacy benefits for the Island's economy and its communities. Agreed.	No change. SPG to be updated to include reference to the successful bid.
A025: Economic and Community Regeneration Service	Objectives	Objectives are clear, however need to capture that informed and integrated decisions during planning and consenting can lead to post build legacy benefits.	Disagree. Throughout the draft Wylfa NNB SPG reference is made to the need for decisions to be informed by a robust evidence base. The draft SPG promotes co-operation between the project promoter and other bodies including the County	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
			Council.	
		'Context' should include reference to existing power station.	Comment noted. Reference to the existing power station is already made at para 1.1.2.	No change.
		Objective 2, word 'commercial' should be used or objective redrafted from a private sector perspective.	Disagree. It is not the purpose of any of the objectives to be drafted from a private sector perspective. Instead, they are intended to reflect the aspirations of the County Council for the Wylfa NNB project.	No change.
	Land use	Agrees with identification of settlements and recognition of Valley as being an important location. Pleased that importance of A55 and A5025 is recognised.	Comment noted.	No change.
		At 5.2 former Great Lakes Site and Amlwch Industrial estate should be mentioned.	Agreed, however the former Great Lakes Site is already mentioned at para 5.4.5.	Amlwch industrial estate to be identified as an opportunity in GP29 and the supporting text.
		Recreation and leisure facilities should be given greater prominence.	Disagree. The draft Wylfa NNB SPG contains a specific guiding principle relating to recreation and leisure facilities (see GP8). It is therefore unclear how recreation and leisure could be given greater prominence.	No change.
		5.1 and 5.7, merge site and Cemaes?	Disagree. GP26 provides specific guidance to the project promoter in respect of the main NNB site. GP32, meanwhile, relates to the wider potential negative effects and benefits of the NNB project with specific emphasis on associated development. In consequence, it is not considered appropriate to merge the two	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
			sections of guidance.	
	Health	The document should inform the developer to minimise/mitigate negative impact whilst maximising positive, could these two issues be strengthened within the reporting format of the topic papers?	<p>Comment noted. It is considered that the draft Wylfa NNB SPG contains clear guidance which seeks to minimise adverse effects arising from NNB project and maximise benefits.</p> <p>The County Council does not intend to update the topic papers. Notwithstanding, it is considered that a key aspect of the topic papers is to identify how the SPG can respond to challenges and opportunities presented by the NNB project.</p>	No change.
		SPG should suggest that the developer collaborates with public sector health bodies to ensure balanced factual information is provided on health matters.	Comment noted. GP7 clearly sets out that the project promoter should work with the County Council and the local health board. Mitigation measures identified in the guidance include the provision of information on health risks to local communities, visitors and businesses.	No change.
		Waste Storage on site – a paragraph to explain why waste will be stored and other options considered would be helpful.	Agreed. GP17 sets out that proposals for interim waste should be justified. However, this could include reference to the consideration of alternatives.	GP17 to be amended to require that proposals for interim storage of waste are fully justified, taking into account reasonable alternatives.
	Tourism and Accommodation	Tourism is very important and warrants its own topic paper. Impacts on visitor infrastructure, image and perception likely to be very strong.	Comment noted. The importance of tourism to the Island's economy is recognised. The draft Wylfa NNB SPG includes a specific section (Section 4.2) on tourism and the importance of tourism is reflected in the locational guidance where	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
			appropriate.	
			It is not considered necessary to prepare a further topic paper on tourism as this is captured in the context of the wider economy within Topic Paper 4: Economic Development.	
		Not enough emphasis given to Irish Sea crossing in relation to tourism. Substantial number of transient visits across Anglesey to meet the ferries.	Agreed.	Paragraph 4.6.7 to be revised to reflect the importance of the Irish Sea crossing and associated transport movements across the Island.
		GP12 needs to cover construction workers accommodation in greater detail with reference to displacement of visitors from accommodation.	Disagree. GP12 requires the consideration of impacts arising from accommodating construction workers within the tourism accommodation sector and identifies potential mitigation measures. Additionally, GP5 sets out the County Council's expectation that development supports the wider visitor economy.	No change.
		Figure 4.2 the heritage coast is not displayed under designations.	Agreed.	Figure 4.2 to be amended to include the Heritage Coast.
		At GP5 question why Visit Wales is referenced and not Economic Development in the County Council or DMP partnership.	Agreed.	GP5 to include reference to the County Council and the DMP Partnership.
		Poverty and deprivation should be included as a key theme within all areas.	Comment noted. Poverty and deprivation is covered in the locational guidance under the social and economic theme where it is relevant.	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
		GP12 image and perceptions should be considered.	Comment noted. Image and perception of the Island is already covered in GP5.	No change.
	Holyhead and Environs	<p>At 5.2 content of VVP 2nd approved bid should be included and used to inform chapter.</p> <p>Suggest adding following at 5.2.4:</p> <p>'... to this end the Welsh Government has approved a £7.5 million funding bid to aid regeneration and housing projects in Holyhead in 2014-17 under the Vibrant and Viable Places urban regeneration framework.</p> <p>The successful bid, Holyhead: Realising Sustainable Community benefit is an ambitious programme to transform one of Wales's most deprived towns. Its main aim is to provide a co-ordinated response to major new developments expected in or near Holyhead in the next five years as part of Enterprise Zone status and Energy Island Programme.</p>	Agreed.	Paragraph 5.2.4 to be updated to reflect the outcome of the VVP bid.
		Page 102. Amend footnote to ' The successful Stage 1 and Stage 2 bids are available on the County Council's website'.	Agreed.	Footnote to be amended.
		Key Issue 5.2: the Port should be given added prominence.	The importance of the Port is highlighted in 5.2.3. It is also identified as an EZ site in para 5.2.8. Access to the Port is identified as a key issue in para 5.3.12.	No change.
	Jobs and Skills	STEM should be given more prominence.	Agreed.	Amend GP2 to refer to the promotion of STEM subjects

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
		The benefits and attractiveness of bilingual education to incoming workforce should be set out. Mandatory induction in Welsh language and culture for all workers and their families.	Comment noted. GP13 already sets out measures to maintain and strengthen Welsh language and culture including language induction and lessons for construction workers and their families.	No change.
		GP13: Importance of bringing skilled people back to Anglesey should be raised as a means of limiting transient workforce and supporting Welsh language and culture.	Agreed.	GP13 to be amended to reference marketing to attract skilled (former) residents back to Anglesey.
		GP5: Additional bullet point relating to digital marketing and promotion should be considered.	Destination marketing is already captured under GP5.	No change.
		Important to recognise that local impacts and benefits will also be felt across the region.	Comment noted. The potential for the Wylfa NNB project to drive the North Wales economy is recognised in para 1.1.4 and is reflected in both the objectives and guidance, particularly with respect to the economy. However, where appropriate it is agreed that greater reference to wider regional impacts could be made throughout the supporting text to the SPG (although it is not considered appropriate for the SPG to include guidance relating to other local authority areas).	SPG to be amended (where appropriate) to acknowledge the potential for cross-boundary impacts.
Legacy and Infrastructure		GP6: Suggest use of words 'integrate' and 'sustainable', as well as facilities - it is about activities and services.	Agreed.	GP6 to be amended to state: 'New services and facilities should be sustainable, integrated and provide a lasting legacy benefit to the Island's communities.'

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
		GP9: Should include reference to shared facilities for workers and the community.	Agreed.	Additional bullet point to be added to GP9 to reflect the expectation that facilities should be shared where possible.
		GP14: Perhaps post build legacy should be mentioned here (integrated strategic planning).	Agreed.	GP14 to be amended to include reference to post build legacy.
		GP15: Investment in utilities is essential to mitigate adverse effects. Investment should create broad economic and social benefits which are not already covered in the SPG.	Comment noted. Investment in utilities infrastructure will be required to mitigate adverse impacts on existing provision. There is no policy basis to expect that this would provide wider benefits. Notwithstanding, the guidance does recognise that the County Council will support proposals that enhance utilities provision on the Island for the benefit of its communities.	No change.
		GP23: Should there be reference to CBC Strategy?	It is not appropriate for GP23 to include reference to community benefit contributions as these are outside the formal planning process.	No change.
		GP24: Post build construction legacy should be included and expand public benefit to include for economic, social and environmental benefits.	Comment noted. However, the County Council considers that the points raised are already addressed in GP24 and do not need to be repeated here.	No change.
		GP26: integrate facilities or shared site facilities between developer and community of Tregale. Clear blight policy required from developer.	Comment noted. The requirement to provide shared, integrated facilities is already captured in GP26 (under first bullet	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
			point). It is not considered appropriate to include in the SPG reference to planning blight.	
		GP30: Corporate hub could be better defined.	Comment noted. The Corporate Hub would be a facility along the A55 which would prevent the need for unnecessary travel to site (for meetings, briefings etc.) during construction. No further details are known at this stage.	No change.
		GP31: Are opportunities for improved social infrastructure adequately covered?	Comment noted however, no specific social infrastructure opportunities are known.	No change.
		Measuring success – no means for quantifying should targets be considered?	Comment noted. It is not considered appropriate to identify targets at this stage. However, GP25 sets out that the project promoter and County Council should develop arrangements for monitoring which should include the identification of evidence-based targets.	No change.
	Topic Papers: Generic Comments	Make them visually distinguishable, using photos relevant to topic. They are light on key issues and recommendations. Issues identified should have a corresponding response, there is sometimes a lack of synergy.	Comments noted. However, the County Council does not intend to revise the topic papers. Further, it is not considered that the proposed amendments would materially affect the contents of the draft Wyfa NNB SPG.	No change.
		Economic development and Tourism should be split into separate topics.	With specific regard to tourism data, the figures quoted in the Economic Development Topic Paper are derived from STEAM 2010 data. More recent data was made available during the preparation of the draft SPG itself (for 2012). The most	
		Economic development and Tourism Topic Paper 4: figures quoted for jobs and value differ from other areas which are quoted elsewhere		

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
		<p>4000 jobs and £240 million.</p> <p>Skills – need for early intelligence to ensure skills base is able to respond.</p> <p>Transport Topic Paper 5; 3.4.9, suggested addition, ‘the single carriageway A5025 between Wylfa and valley currently lacks overtaking opportunities which contribute to its poor accident record’.</p> <p>4.6.1. suggested addition, ‘..Minimise potential negative impacts such as tailbacks and delays caused by construction works and related traffic movements’.</p>	<p>up-to-date data (as referenced at para 4.2.1 of the draft SPG) indicates that the tourism sector contributes around 4,000 jobs and £240 million in revenue.</p>	
A026	Overall	<p>Consultation is a necessary part of the planning process but a sham. It would make more sense to locate the power station close to existing centres of population which require the power.</p> <p>Suggestion that it is better to keep habitation 3km away from the station and suggests the purchase all existing properties within this radius for use by construction workers.</p>	<p>Comment noted. The remit of the Wylfa NNB SPG does not extend to commenting upon the location of the main site which has been determined by UK Government and which is supported via national policy in the form of NPS EN-6.</p> <p>Comment noted. NPS EN-6 states (at paragraph 2.7.2) that the regulators play an important role in ensuring the safety, security and protection of people and the environment in relation to design, construction, operation and decommissioning. The regulators are Natural Resources Wales, the Office for Nuclear Regulation and the Department of Transport. It does not lie within the remit of the County Council to require the compulsory purchase of properties within 3km on the basis of health and safety. Whilst use of properties close to the site would reduce journey times to work, it is unlikely to lead to longer-term legacy</p>	<p>No change.</p> <p>No change.</p>

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
			benefits over and above opportunities that may exist within the existing settlements of Holyhead, Llangefni and Amlwch.	
		Consider that other countries are closing down nuclear power stations.	The issue of nuclear safety has been addressed within the comment above.	No change.
		Questions the safety of the proposed 'boiling water' technology.	As above.	No change.
		Raises the issue of climate change and potential impacts upon the power station in addition to potential for seismic activity and resultant tidal waves.	Comment noted. The draft Wylfa NNB SPG considers the issue of climate change with particular reference to associated development sites at GP19. The Secretary of State as decision-maker will need to be satisfied that the NNB includes adaptation measures which take account of the effects of climate change.	No change.
		Requests consideration of plans for evacuating the Island and how pollution into the Irish sea would be controlled.	In the UK the ONR determines the off-site emergency planning area for nuclear installations where there is a potential for an off-site release of radioactivity that may require implementation of countermeasures such as evacuation. This is carried out under the Radiation (Emergency Preparedness and Public Information) Regulations 2001 (REPPIR).	Add reference within SPG to the legislative procedures for emergency planning.
			In January 2014, ONR published revised principles for determining REPPIR off-site emergency planning areas around nuclear licensed sites in the UK. This means that ONR considers local practical and strategic factors associated with implementing the plan when they determine the area. More information on the process used by ONR is available by visiting http://www.onr.org.uk/depz-onr-	

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
			<p>principles.htm.</p> <p>Upon notification by ONR of the area requiring an emergency plan, the County Council consults all of the agencies with a role to play in its implementation.</p> <p>Following consultation with the relevant agencies and the operators, the County Council has to produce its off-site emergency plan within 6 months. The plan will consider a range of countermeasures proportionate to the risks identified, including sheltering or evacuation. The plan will be tested in an emergency exercise that includes the Local Authority, the police, the regulator, the met office, public health bodies and other agencies that would be involved in an event. Decision to evacuate or shelter would be taken based on the specific factors presented on the day.</p> <p>The Local Authority Emergency Plan will considered every three years, following the operator's identification of hazards on site and the risks they present to the public, or when the operator makes a material change to activity on the site. This means that any changes associated with nuclear new build will be considered under REPPiR.</p>	
A027		Imperative that public rights of way are kept open or alternatives provided.	Comment noted. GP5 requires that the project promoter consider the effects of development upon public rights of way. Further consideration of rights of way are contained within the Areas of Search	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
			guidance. GP 5 identifies strategic improvements to the public right of way network as mitigation for any localised effects resulting from the development.	
		Concerned that the coastline and land to the north be kept open.	Comment noted. As above, one specific mitigation measure identified is for the project promoter to maintain and where possible enhance access to the coast allied with improvements to the Coastal Path.	No change.
		Concerned that demolition has already started and does not seem to be necessary (e.g. the Old Boathouse).	Comment noted. Consent has been granted by the County Council for the works referred to in this response and they are therefore considered to be acceptable in planning terms.	No change.
		Most important that any public facility provided such as nature reserves is subject to a legal requirement for future maintenance.	GP23 sets out the Council's intention to secure legal agreements with the project promoter to deliver and maintain appropriate replacement or compensatory facilities which could potentially include for nature reserves.	No change
A028 Safe Streets	Transport	<p>Section 4.6. The first three bullet points should be replaced by:</p> <ul style="list-style-type: none"> Minimise the adverse impacts of the development upon the key strategic transport infrastructure. <p>Minimise the adverse impacts of the development upon the key local transport infrastructure.</p> <ul style="list-style-type: none"> Maximise the impact of the development on long-term improvements to transport 	The recommendation for replacement bullet points, whilst appropriate in their own right are considered to represent aims/objectives whereas the purpose of the bullet points is to suggest actual measures to be taken in mitigation, and thereby achievement of the aims suggested.	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
		<p>infrastructure.</p> <p>Provide safe pleasant routes for non-motorized transport and travel within and between the settlements most affected, and the site itself.</p> <p>Ensure that those routes are inaccessible to fast or high-volume motor traffic, especially that generated by the development.</p>	<p>Comment noted. Recommendations for inclusion of safe and pleasant routes within settlements and between settlements is captured within GP14 which requires that non-motorized travel opportunities (listed as walking and cycling) are encouraged including new provision in line with existing strategies.</p>	<p>No change.</p>
A029	General	<p>SPG is flawed and should be suspended pending rectification of deficiencies including failure to its opportunity cost analysis justifying the Council's weight behind the new build.</p> <p>Also suspend because SPG is premature on the ground that the JLDP is not due for adoption for a further two years.</p> <p>Publication of a background document detailing all consultation, negotiations and discussions etc between the Council and other parties.</p> <p>Publication of a separate register of contacts between Council and project promoter.</p> <p>Above documentation to be available to public and regularly updated.</p> <p>Fresh consultation on SPG following adoption of JLDP.</p> <p>The facilitating purpose of the SPG should be set out in the foreword and reasonably should include the leading first bullet at para 1.2.2. It is essential for the Council to set out its stall accurately and unambiguously at the outset.</p> <p>Section 1.5 should set out how the Council</p>	<p>The County Council notes the various points made. The County Council does not agree that the draft Wylfa NNB SPG is flawed or premature or has been prepared in accordance with a deficient or inappropriate process. The status of SPG generally is well established in law and does not need to be explained in further detail. In particular, the relationship of the SPG to the Development Plan, the Stopped UDP and the emerging JLDP is clearly explained. The County Council agrees that the SPG will need to be consistent with the adopted JLDP and intends to review the SPG once the JLDP has been adopted.</p> <p>All consultation responses received on the draft SPG have been summarised in this Schedule of Responses.</p> <p>The County Council is committed to clear communication with the public which will take the form of publicity on its website, press releases and reports to Committee as and when circumstances dictate. This will be in addition to the consultation</p>	<p>Foreword is to be amended to remove references to the consultation process. The purpose of the SPG will be emphasised to provide greater clarity and certainty.</p>

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
	Statutory deficiency	<p>intends to make all consultation received in a separate document.</p> <p>The Council have failed to set out the legal standing (primary or secondary legislation) for the SPG.</p> <p>Document should state whether enforceable in law and which parties may act if breach against SPG by project promoter, in the event of multiple breaches and the extent to which the Council will re-consult if subsequent tweaks to GPs.</p> <p>Council have failed to state whether there has been formal/informal consultation with project promoter on any GP.</p> <p>Para 1.1.6: is the SPG meant to be free-standing and is it superior/inferior to other planning guidance?</p> <p>Para 1.1.9 how can the stopped UDP be relied upon inclusively as the current development plan; on what statutory, legal or administrative authority is the Council able to embed the proposed SPG in an as yet unadopted JLDP?</p> <p>Paras 1.2.3 and 2.3.2 apparent contradiction over whether the SPG can create new policy when it recognises that there is no Wylfa NNB policy within the existing development plan. Is the Council trying to circumvent normal processes for the adoption of policy by using an SPG and does this SPG become, by default the development plan for the Wylfa site and project?</p>	<p>material produced by applicants for development consents and the Council's management of consultation responses to these. The Council will also abide fully by the disclosure requirements of the Local Government Acts, Freedom of Information Act and Environmental Information Regulations. Beyond that the Council does not have plans for any register or publication of communications between it and any party, either in relation to the adoption of the SPG or the determination of any applications for development consent to which the application of the SPG might be relevant. It is not considered that it would assist the process of clear communication of with the public to adopt such a broad and ill-defined policy of reporting, nor does the Council have resources to be able to manage such a process effectively.</p>	
	Visions and	<p>Vision is deficient in that it fails to recognise the fundamental characteristic of nuclear reactors</p>	<p>Disagree. The principle of nuclear power and the appropriateness of the site has</p>	<p>No change.</p>

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
	Objectives	<p>which is the production of radioactive waste and the long-term implications that arise. Also deficient in that it fails to recognise the process of decommissioning and site restoration, the Council should bind project promoters to clear commitments and expectations on decommissioning.</p> <p>What is the Council's aspiration regarding the removal of on-site radioactive waste stores or even potential retention on site for long periods. Does the Council aspire to hosting a GDF?</p>	<p>been determined by UK Government and it does not lie within the remit of the Wylfa NNB SPG to address this issue. NPS EN-6 states at paragraph 1.1.1 that 'The Government believes that energy companies should have the option of investing in new nuclear power stations'.</p> <p>On the matter of decommissioning the County Council maintains its position as set out in paragraph 1.2.6 of the draft SPG.</p> <p>National Policy NPS EN6 sets out the UK Government's position with regard to long-term storage. On the issue of interim storage on site, the County Council has set out its position within GP17. This will be amended to include for a requirement that the developer assess the impacts of interim storage, including radiological effects.</p> <p>The County Council has previously stated that it opposes proposals for a GDF (see http://www.anglesey.gov.uk/empty-nav/news/press-releases-2014/april-2014/anglesey-will-not-accept-nuclear-waste/122675.article)</p>	<p>In addition, and in response to other comments received, an additional reference to in GP17 will be made to potential radiological effects and the need to assess them.</p>
	GP17: Nuclear Waste Storage	<p>Restate paragraph 4.4.8 unambiguously and clear. Namely whether the Council will cause a public local inquiry to be held for any proposal that includes for the storage of nuclear waste for associated developments albeit within the Wylfa site.</p> <p>Rectify GP17 such that rather than 'discussion between the parties' (final bullet) reference instead to public involvement and engagement</p>	<p>Comment noted. It is not within the scope of the Wylfa NNB SPG to address issues relating to the principle of long-term nuclear waste storage.</p> <p>Agreed. Reference could be added to 'public consultation'</p>	<p>No change.</p> <p>Include reference to 'public engagement' in GP17.</p>

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
		<p>to ensure full transparency.</p> <p>Also Council should state whether it would countenance the delegation of the determination of any proposals for interim nuclear waste stores to the Planning Inspectorate (under Planning Act 2008). Also should disclose any circumstances where this may occur.</p>	<p>The question of whether interim nuclear waste storage can lawfully be dealt with as part of the DCO (and therefore by way of an application to the Planning Inspectorate) or as associated development (and therefore by way of an application to the County Council) depends on the detail of the proposals which the Wylfa NNB project promoter develops and the interpretation of the relevant provisions of the Planning Act 2008.</p> <p>It is not the purpose of the SPG to set out how the Council may or may not respond. However, given the comments received regarding waste and its storage to the consultation on the SPG, the County Council will be writing to Horizon requesting that these matters, which are outlined in the scope of the SPG, be covered in detail in the forthcoming PAC1 consultation.</p>	<p>No change.</p>
	<p>Miscellaneous</p>	<p>No explanations to why the Council has not considered GPs on:</p> <ul style="list-style-type: none"> -Extreme or prolong coastal storm surge events in the context of rising sea levels; -Impact of extraneous mega tsunami pulses affecting coastal areas. 	<p>Comment noted. GP19 of the draft Wylfa NNB SPG concerns adaptation to climate change and sets out that the project promoter will be expected to ensure that development is able to withstand the effects of climate change including extreme weather events. However, it is considered that GP26, which sets out key development principles in respect of the main site, could include a specific bullet point(s) relating to the need to ensure that the NNB is resilient</p>	<p>Amend GP26 to include reference to the need to ensure that development is resilient to storm surge and tsunami.</p>

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
			to flood risk including from storm surge and tsunami.	
		The Council has failed to explain its unqualified facilitation and support for the project and hence the SPG. The entire SPG appears to be based upon assisting site promoter.	Disagree. The guidance contained within the draft Wylfa NNB SPG is designed to minimise adverse impacts arising from the NNB project and maximise benefits.	No change.
A030: Conwy County Borough Council	General	<p>The wider regional impacts, mitigation and regional partnership approach need to be strengthened in the SPG. Skills programmes/apprenticeship schemes, housing delivery and a trans-European A55 Road and Rail route, are seen by the SPPS as vital strategic community factors as well as developing the appropriate transport infrastructure to assist delivery.</p> <p>It is important in terms of the weight required that it is informed by a locally adopted policy in the first instance.</p>	<p>Comment noted. The Wylfa NNB SPG's prime focus is with regard to Anglesey because its purpose, as set out at section 1.2 of the draft SPG, is to, inter-alia, be a material consideration in the consideration of applications for associate development and to inform the County Council's Local Impact Report. The ability of the SPG to consider and address regional impacts is restricted as the County Council considers that it would not be appropriate to establish guidance covering other authority areas.</p> <p>Notwithstanding, reference is made to the trans-European A55 within paragraph 4.6.5 (Euroroute 22), to the importance of rail, to a stated objective of the SPG (Objective 2) to extend benefits to the North Wales economy and to skills development, (GP2).</p> <p>It is accepted that, particularly within the context of skills, reference to the wider regional skills partnerships is appropriate, for example, Menter Mon's Shaping the Future project which includes funding from Gwynedd whilst some of the bodies listed elsewhere within the respondents comments could be mentioned under Objective 2 (see below).</p>	Add at supporting text to GP reference to the need to consider linkages into existing Island and regional skills programmes such as Shaping the Future. Potential to amend delivery partners under SPG Objective 2 – see below.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
	Vision and Objectives	<p>The vision as stated in Paragraph 3.1.3 is Anglesey specific and omits the wider North Wales region. It is considered that Conwy CBC is a key delivery partner in delivering the objective as per 3.2.3 of the SPG. Conwy's Skills Board would welcome involvement in bringing forward the Supply Chain Development Programme.</p>	<p>Comment noted. The purpose of the Wylfa NNB SPG is to provide guidance on how current and emerging national and local planning policies will be applied. It would not therefore be appropriate for it to cover explicitly issues beyond the Island. However, the document could be strengthened to recognise the potential for regional impacts where appropriate and cross-boundary bodies could be identified as key delivery partners in Section 3.2.</p>	<p>Further reference to regional impacts to be included in supporting text where appropriate.</p> <p>Energy Island Strategic Forum to be identified as a key delivery partner in Section 3.2.</p>
		<p>Impacts arising from demand for accommodation may extend to neighbouring local authorities. Potential to produce a 'gravity model' to identify approximate number of workers within certain travel zone requiring accommodation. Model should also consider displacement. Currently Conwy's LDP does not include for Wylfa Newydd and implications need to be understood.</p>	<p>Comment noted. Conwy CBC should consider commissioning a gravity model if this would help to understand the potential for effect upon its housing market, in liaison with the County Council. Until the breakdown of worker numbers and types is available such a model may be premature</p>	<p>No change.</p>
		<p>Greater competition for rented accommodation on the Island, resulting from influx of construction workers could potentially push local residents off the Island to look for accommodation which may increase pressure on available housing in Conwy.</p>	<p>Comment noted. It is accepted that demand for accommodation on Anglesey may displace residents into neighbouring authorities if the numbers, location and types of construction worker accommodation is not properly planned. The Wylfa NNB SPG aims to set in place guidance and recommended mitigation measures to minimise the negative effects upon occupiers within the current local housing market and thereby reduce any potential for significant displacement.</p>	<p>No change.</p>
		<p>Welcomes creation of a Housing Fund which should extend to cover neighbouring authorities if impacts identified within any agreed gravity</p>	<p>Comment noted. It would be appropriate for Conwy CBC to discuss the potential for a housing fund for its area with the project</p>	<p>No change.</p>

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		study.	promoter. This is not a matter for the Wylfa NNB SPG.	
		Accommodation in vacant holiday lets would provide a boost to the local economy off-season. Renting of single rooms may also benefit local homeowners. Conwy maintains its position that subject to gravity model evidence that that a proportionate amount of mitigation funding should be directed to the wider region.	Comment noted. As a neighbouring authority, Conwy CBC will be a statutory consultee as part of the DCO application. It will therefore be able to provide evidence to demonstrate its position that tourism accommodation within its area could be affected and as such that mitigation is required.	No change.
		Conwy would welcome the invitation to be part of the Supply Chain Development Programme and any proposed business management or forum.	Comment noted.	No change
		Objective 2 of the SPG covers wider regional economic opportunities and benefits. The list is supported, however, when referring to North Wales, for example in up skilling the region's workforce, the table listing Key Delivery Partners and Key Plans/Programmes should include other regional stakeholders and strategies e.g. North Wales Economic Ambition Board, various regional/sub regional apprenticeship schemes linked to the construction sector e.g. North Wales Shared Construction Apprenticeship Scheme.	The County Council agrees that the delivery partners/programmes should be noted.	Delivery partners/programmes under Objective 2 to be extended to include those referenced.
		Further consideration is also required of the socio-economic impacts on Gwynedd, Conwy and the National Park (e.g. if considered for travel to work purposes, but also in terms of economic opportunities).	Comment noted. Whilst there is the potential for socio-economic impacts arising from the NNB project to extend to Conwy, Gwynedd and the National Park, it will be for these authorities to request that such matters are considered by the project promoter (e.g. when responding to the scoping report and ultimately when	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
			commenting on the Environmental Statement). Objective 2 sets out an aim to maximise benefits to businesses in North Wales, these benefits can derive from a stronger Anglesey economy and it is this which is the focus of GP1 and GP2.	
		Section 5.8 – there is a Guiding Principle for the ‘rest of Anglesey’ but should there also be a section, and possibly a Principle, for the wider region and North Wales. Also questions whether the principle of ‘accumulated’ development comes in to consideration re impact in relation to other major regional projects e.g. development of the new prison near Wrexham and ongoing STEM skills demands around AIRBUS’ growth strategy.	Disagree. The Wylfa NNB SPG’s focus extends to Anglesey only in seeking to interpret adopted Local Plan policy. Therefore, it is not considered appropriate to include guiding principles that seek to guide the type, scale and location of development beyond the authority’s boundary.	No change.
	Welsh Language	Objective 5 and the Impact Assessment should reference key stakeholders, such as Mentrau Iaith,	Agreed. The County Council agrees Mentrau Iaith Mon should be identified as an important Delivery Partner.	Mentrau Iaith Mon to be included as a key delivery partner under Objective 5.
		GP13 Welsh Language – consider additional mitigation measures as advocated in TAN 20, i.e. spatial distribution (impact on areas of high % Welsh speakers, where Welsh language has been identified as a significant part of the social fabric of some or all of the community); phasing new homes delivery; affordable housing for local needs provision; local labour contracts; Support for the provision of school places in Welsh medium schools. It is appreciated that some of these are mentioned elsewhere in the SPG but it would be useful to reference them again here.	Agreed. Some of the mitigation cited could be included as examples under the relevant bullet point in GP13.	Add reference to more precise examples of mitigation under relevant bullet points to GP13.
	Planning Obligations	GP23 Planning Obligations – requests whether consideration has been given to the potential for	CIL will be considered as part of the JLDP process. CIL requires an adopted LDP and	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
		using the Community Infrastructure Levy (CIL) process in seeking contributions to infrastructure, considering the timescales for Wylfa delivery and CIL Regulations and restriction of Section 106 contributions from April 2015.	will be subject to a separate Examination/ Inquiry.	
A031	Economy and Transportation	<p>Small businesses on Anglesey employing local people should be seen to be encouraged and be successful in winning tenders in the new Wylfa power station build programme and decommissioning of Magnox.</p> <p>The federation of Small Businesses has for many years lobbied on the value of investing in local business and the economy. There will be an enormous pressure on local services and facilities and presumption that Council is aware of the changes that will descend on the Island.</p> <p>Aware that there will be expansion of the transportation network to enable construction deliveries. The Federation has been lobbying for the electrification of the main line, construction of a new bridge or Britannia Bridge 'bolt on'. Congestion along the A55 will be significant unless investment is forthcoming. The Irish Government has also expressed concern about delays caused by the Britannia Bridge which affect the ferry companies.</p>	<p>Comment noted. The draft Wylfa NNB SPG seeks to ensure that local individuals and businesses are provided with the necessary skills and support to enable them to compete for relevant tenders.</p> <p>Comment noted. The County Council is aware of the changes that may occur as a result of the NNB project. It is this awareness which has led to the preparation of the Wylfa NNB SPG, which broadly seeks to ensure that adverse impacts on local services and facilities will be mitigated and opportunities identified to provide a lasting legacy benefit through enhancement to existing, and the provision of new, services and facilities.</p> <p>Comment noted. The draft Wylfa NNB SPG recognises the issues of congestion with particular reference to the Britannia Bridge. The project promoter will need to demonstrate that the potential for congestion as a result of the project can be mitigated. Mitigation measures proposed may include the use of rail and the Secretary of State (in the context of the SPG) will need to be reassured that such mitigation will be deliverable and successful.</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p>

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
	Skills and Education	Students and school children are being encouraged to take on studies linked to the nuclear industry and are being made of future, potential employment opportunities.	Comment noted.	No change.
	Tourism	The North Wales Tourism Board should increase advertising budgets to encourage incoming people to take a look at major tourist hotspots with a view to visiting or buying accommodation whilst working at Wylfa.	Comment noted. The draft Wylfa NNB SPG requires the project promoter to support destination marketing within GP 5.	No change.
	Services	The Police must be aware of the potential issues arising as a result of an influx of construction workers.	Comment noted. The potential for socio-economic effects including crime and disorder will need to be set out and assessed by the project promoter. It is envisaged that this will be done in consultation with the Police. The supporting text to GP23 of the draft Wylfa NNB SPG lists measures to minimise crime and disorder as potentially requiring legal agreement.	No change.
A033	7. Population and Community	The project promoter should involve local general practitioners along with the BCUHB to review existing healthcare provision. An in depth study should be undertaken to investigate the impact of construction workers, friends and families and associated service industries. A vision for better surgery facilities, reduced GP to patient ratios and improved healthcare infrastructure should be developed.	<p>Comment noted. GP23 of the draft Wylfa NNB SPG states that contributions towards requirements for health care as a result of the NNB may be required by the County Council. Whilst such contributions could include for new or improved surgery facilities and healthcare infrastructure, it is not considered appropriate to be specific as the type of improvements necessary will be dependent upon the effects identified.</p> <p>In this respect, GP7 sets out that the County Council will expect the project promoter to work with the Health Board to identify potential impacts and mitigation measures whilst GP6 sets out the project</p>	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
			promoter should ensure that appropriate health care facilities are in place to accommodate the NNB project.	
A034	General	Refers to a letter from DECC which explains the public consultation process for NSIPs and requests a future opportunity to speak at an open floor, formal hearing. Notes that it is at that stage that an opportunity to express views on the acceptability or otherwise of Wylfa NNB will be made.	Comment noted. The County Council assumes that the Planning Inspectorate will hold open floor hearings once the DCO application for the main site has been submitted.	No change.
	SPG Purpose	Concern that the Council's interpretation of national policy and this consultation does not replace any consultation between the public at a national level. Also questions how a locally elected council can consider the implementation of national policy noting that there has been no national referendum on Wylfa NNB.	Comment noted. The remit of the Wylfa NNB SPG does not extend to the acceptability of new nuclear or to the principle of development at Wylfa. This is a decision which has been made by the UK Government. The purpose of the SPG is set out at Section 1.2.	No change.
		Questions that nuclear power can be defined as 'low carbon' (page 5) particularly when there is evidence elsewhere that the SPG is indicating it is not. Consideration should also be given to materials used in construction, in operation and the approach to decommissioning which includes for the long term storage, and safety of spent fuel.	Comment noted. The UK Government describes nuclear as 'low carbon'. It is accepted that PPW6 excludes nuclear from its consideration of 'low carbon' but it is presumed that this is due to the fact that, for the purposes of PPW6, nuclear falls outside of its planning remit. The County Council does accept that there will be significant amounts of carbon used in the construction of the NNB and the draft Wylfa NNB SPG therefore sets out how this could be mitigated at GP18.	No change.
		Reference to 4.6.2 and to the '1 million tonnes' of concrete and hence to the fossil fuels need to make it. Question on the ability of the ports and railway to accommodate freight related to the	Comment noted. The reference is an initial estimate which the County Council understands will be refined by the project promoter as the design evolves. The	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
		NNB and that congestion on the network would affect existing users and lead to economic loss, as opposed to benefit. Impacts to network may also affect tourism.	Council seeks to prioritise rail and water transportation over road to minimise congestion and any infrastructure improvements necessary to facilitate such transportation will need to be secured by the project promoter. Where road transport is used, the draft Wylfa NNB SPG requires the project promoter to identify where congestion may occur and to deliver mitigation.	
		Present tourist perception of Anglesey could be affected by the presence of the NNB.	Comment noted. The draft Wylfa NNB SPG (at Section 4.2) highlights that the NNB project could affect visitor perception of the Island and GP9 seeks to ensure that such impacts are duly considered by the project promoter.	No change.
	Waste	It is not possible for the developer to demonstrate what the SPG seeks, in relation to nuclear waste, i.e. that storage will not have adverse impacts on local communities, given that it will need to be stored for 140 years. All communities have rejected geological storage so there are no facilities in place. The only way to resolve the problem is to object to all new nuclear development.	Comment noted. The principles of nuclear power and the matter of nuclear waste storage fall outside the remit of the Wylfa NNB SPG and is a matter for UK Government and the Nuclear regulators. However, the draft SPG recognises that the issue has implications for the Island and that it is a matter which the County Council may wish to respond to within its Local Impact Report. In this regard, GP17 calls for the developer to provide information on likely effects and to mitigate any that are adverse. It does not require the project promoter to demonstrate that there will be no effects.	No change.
	Trans-boundary effects	Concern that effects arising from nuclear extend beyond Anglesey, North Wales and UK to include Ireland and refers to Irish Government policy and the exercises it has undertaken to	Comment noted. The principles of nuclear power and the matter of nuclear waste storage fall outside the remit of the Wylfa NNB SPG and is a matter for UK	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
		practice for fire at Wylfa A.	Government and the Nuclear regulators.	
		Reference to a German study KIKK which links nuclear power to childhood leukaemia.		
		No reference in guidance to Government's reason for wanting new nuclear being linked to requirement for nuclear weapons. Restatement of a requirement for a national referendum and attention drawn to the effects on those who mine uranium.	Comment noted. The principle of nuclear power falls outside the remit of the Wylfa NNB SPG and is a matter for UK Government and the Nuclear regulators.	No change.
A035	Topic Paper 5	Movement of the largest sizes of equipment to Wylfa would be best done by using flat bottom barges as this saves on the cost of road improvements and avoids the issue of the relatively limited loading gauge on the railway. Bulk quantities of stone, concrete and steel reinforcing bars are most appropriately transported by rail. Possibility of a railhead at Rhosgoch (former Shell site) with improved road link to site. Improvements would be needed from Gaerwen and the Holland Tunnel. Road haulage should be kept to a minimum. There is precedent for bulk transportation of material by rail, such as the fly ash and cement transported by rail to storage soils at Bangor station during construction of A55.	Comment noted. The draft Wylfa NNB SPG, which is informed by Topic Paper 5, seeks to prioritise rail and water transportation over road. The precise measures which the project promoter may choose to move equipment and materials by these means is considered too detailed a level to be appropriate for the SPG.	No change.
		Paragraph 2.4.10: Wales Freight Strategy 2005: this did not achieve what it was meant to.	The Rhosgoch site is identified as an Enterprise Zone site EZ8. The draft SPG states that the site is appropriate for NNB related development.	
		Paragraph 2.4.12: 'remove psychological barrier to rail travel ' what does this mean?	Comment noted. The strategy is listed as a policy document, the Topic Paper does not comment on the success or otherwise of documents.	No change.
		'Stimulate modal shift': how and when?	Comment noted. This reference is taken from the Wales Rail Planning Assessment.	No change.
			Comment noted. This reference is taken	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
			from the Wales Rail Planning Assessment.	
		'Enhance overall rail experience': does this mean free travel?	Comment noted. This refers to the quality of the journey, such as the condition of the trains, the environment within and surrounding the railway stations.	No change.
A036: Welsh Language Commissioner	Welsh Language Impact Assessment	<p>The new TAN 20 says that assessments should be based upon robust evidence. The evidence for the assessments is contained in Section 5 of the Welsh Language Impact Assessment. There is no attempt to map the development scales and the Welsh language situation. For example, no data to show how the development has contributed to Welsh language changes and demographic changes. Furthermore, no data relevant to the development in question. For example, consideration could be given to the linguistic and demographic nature of the current workforce.</p> <p>Turning to the Assessment itself in section 6, the response to the first question on the population includes the statement, "<i>New development can influence population movement in an area. It may impact positively through stabilising populations or promoting growth through in-migration</i>". That may be true, but there is no evidence in section 5 of the assessment to support the statement. Failure to link "development" with language and migration in section 5 is a considerable weakness in the assessment.</p> <p>Little consideration to the impact of the long-term permanent workforce, how many jobs, likelihood</p>	<p>Comment noted. The County Council accepts that there is currently little evidence relevant to the development in question, and also the current Wylfa A workforce. This information is not held by the Council. When submitting their DCO application the project promoter will be required to provide a WLIA. It is considered to be more appropriate for that document to contain the evidence required. The purpose of the WLIA of the Wylfa NNB SPG is to assess the potential impacts of the SPG guidance on the Welsh language as opposed to the NNB itself.</p> <p>Comment noted. The WLIA is concerned with the application of policy guidance contained within the SPG rather than the effects arising from the NNB itself.</p> <p>Comment noted. Accurate information on the number of jobs generated during the</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p>

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
		of being filled by the local population.	operational phase has not been provided by the project promoter at this stage. It is therefore not possible to predict how many employment opportunities will become available to local people. This will be something which the project promoter needs to consider when preparing an WLIA to accompany the application for the main site. The role of the Wylfa NNB SPG is to provide policy guidance and hence the role of the accompanying WLIA is to consider the extent to which this guidance alone may have positive or negative impacts upon the Welsh language.	
		Question 2 on in-migration and question 3 on out-migration. The lack of information in relation to the numbers of long term / permanent jobs is a weakness and makes an assessment of the impact of in-migration almost impossible. Detailed planning in relation to skills in the local labour market and collaboration with schools and colleges is obviously important in order to have a positive impact on the jobs proposed by the project. That could lead to a reduction in out-migration for example and targeted planning is expected in order to ensure that as many jobs as possible go to the local population. However, the lack of specific evidence in the assessment makes it very difficult to assess the impact of the project on migration in general.	Comment noted. As above, information provided previously by the then project promoter for the NNB was based upon a different reactor technology. Until accurate information is provided relative to the new technology it is difficult for the County Council to predict the likely level of impacts, both positive and negative. Whilst unable to work with actual numbers, the draft Wylfa NNB SPG does identify a requirement to improve skills and educational performance on the Island which should benefit those seeking employment at the main site. Reference can be found at GP2.	No change.
		The lack of evidence also makes it difficult to assess the likely impact upon local schools, the assessment does not set out the size of the permanent workforce nor how many might in-migrate to fill the vacancies.	Comment noted. As above, the size of the permanent workforce is not known and the draft Wylfa NNB SPG requires the project promoter to assess the impact that the project may have upon schools (i.e. demand for additional school places).	No change.

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			Furthermore, the draft SPG states that the County Council will require the project promoter to fund the need for additional educational facilities should these be required (GP2 and 23).	
		The assessment concludes that the project is likely to have a positive impact on 16 of the 18 questions considered. On the basis of the gaps in the evidence and data, it is very difficult to accept this conclusion. It would be more logical, based on the lack of information in the assessment, to conclude that the impact on a number of topics is currently “unknown” and that further research work is required.	Comment noted. The conclusions reached in the WLIA relate to the performance of the guidance contained within the draft Wylfa NNB SPG rather than the NNB project itself and are considered to be valid.	No change.
		In submitting the above comments, there is awareness that other language impact assessments will follow and comment that it is essential that the most robust and specific evidence possible is used as a basis for the work. What is highlighted in the SPG and the WLIA is the real need for further research and analysis and there may be a need to invest in specialist advice in order to do that. Otherwise, there is a risk that it will not be possible to sufficiently assess the impact and that, in turn, will hinder efforts to plan effective and appropriate mitigation measures.	Comment noted. The County Council accepts that there is a requirement to undertake more research in order to fully understand the potential for both positive and negative effects upon the Welsh language as a result of the NNB project. It will be the responsibility of the project promoter to commission and publish this research.	Include within GP13 reference to the importance of considering the cumulative effects on the Welsh language arising from both the main site and associated developments.
			The draft Wylfa NNB SPG (at GP13) requires a detailed linguistic assessment to be undertaken as part of the main site application with language statements or language impact assessments to accompany any applications for associated development. The Council recognises that in-combination, the development of the main site and associated sites may create cumulative effects.	

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A037: Gwynedd Council	Purpose of SPG	The purpose of the SPG is to provide guidance on how policies will be applied, and in this case it states how the current Development Plan policies for the Island and the Anglesey Unitary Development Plan will be applied. It would not therefore be appropriate for it to cover issues beyond the Island. However, likely impact of the NNB will extend beyond the Island.	Comment noted.	No change.
	Objective 1	Refers to the Anglesey Enterprise Zone but does not refer to the added value that could come from collaborating with the three Enterprise Zones in the north, and particularly the Snowdonia Enterprise Zone which also has a focus on the energy sector and could bring activity to support the energy agenda in the region.	Agreed. The activities of the other Enterprise Zones in North Wales could be referenced in the SPG.	Add in 3.2.2 reference to opportunities to work in collaboration with the other Enterprise Zones in North Wales.
	Objective 2	No reference to other authorities as key development partners.	Agreed.	Objective 2 key development partners to be extended to include neighbouring authorities.
	Objective 6	This objective is likely to affect travelling networks which extend beyond the Island but there is no reference to this. The transport / travelling corridor will extend much further than the Island to the east and to the south.	Comment noted. Reference is made to the North Wales main line and North Wales Transport Plan. Whilst the Wylfa NNB SPG can recognise that effects will extend beyond the Island, it is considered inappropriate to cover these issues within the document other than by mention of them within supporting text.	Add references within supporting text 4.6 to recognise that effects upon transport networks are likely extend into the wider region.
		There are many references to the Energy Island Programme and to the Energy Island Strategic Forum, but no explanation that the Programme includes cross-border partners and that there is an expectation / reliance on cross-border partners to assist in ensuring that benefits	Comment noted. The County Council recognises that the Programme and Forum include cross-border partners and that this should be reflected within the Wylfa NNB SPG.	Explain that cross-border partners will be important to ensure realisation of the benefits that may accrue as a result of the NNB.

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		remain 'local'.		
	Linkages with other Plans	<p>Whilst not appropriate to state how Gwynedd Development Plan policies would be applied, there should be recognition of the SPG and the JLDP relationship, the need to demonstrate cross-border collaboration when preparing a development plan and the existing cross-border partnership.</p> <p>It is suggested that a general section or sections should be added at the beginning of the document noting, although the document is focusing on the benefit to the Island's economy, that there will be a two-way relationship between the Island and the wider area, in terms of the following:</p> <ul style="list-style-type: none"> • Providing opportunities which will spread further than the bridge in terms of employment and the development of companies in the supply chain • The opportunity that exists for workers and supply chain companies from the wider area to contribute to the Wylfa NNB • The opportunity that regional discussions can bring in terms of responding to concerns about the scale of the workforce required to retain the benefit "locally" • The added value which can come through collaboration within the three Enterprise Zones in the north, and particularly the Snowdonia Enterprise Zone which also has a focus on the energy sector and can bring activity to support the energy agenda in the region • The North Wales Ambition Board Vision to show how the development plays a part 	Comment noted. The County Council accepts that additional recognition should be given to the potential for regional impacts beyond Anglesey and will consider the wording suggested.	Strengthen existing references to regional impacts within supporting text.

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		within the wider vision for North Wales. Together with a need to recognise the cross-border relationship within the topic papers.		
	Updated Plans and Policies	Recommend that prior to adoption that factual information is updated, e.g. revised versions of Planning Policy Wales and TAN 23 have been published since preparing the document and the topic papers and the Government's affordable housing target has increased.	Agreed.	Plans and programmes referred to in the draft Wylfa NNB SPG to be updated where appropriate.
A038		Statement that this consultation represents the first time that the Council has consulted with Community Councils on the New Nuclear programme. Criticism of the six week period to consult providing insufficient time.	Comment noted. The responsibility for consultation on the NNB rests with the project promoter. The County Council, as local planning authority, has taken a decision to provide planning guidance in the form of the Wylfa NNB SPG and as such consultation has been undertaken. The principle of nuclear power, and the appropriateness of the main site at Wylfa has been determined by the UK Government. Comment noted. The County Council is of the opinion that six weeks provides sufficient time to respond to the consultation and is consistent with other consultations on planning policy documents.	No change. No change.
	Vision and Objectives.	Considers inaccuracies are contained with regard to reference of nuclear as being low carbon. The nuclear chain is not entirely low carbon. Uranium has to be mined, milled and enriched, and transported from countries as far away as Namibia, Niger, Australia, Canada and Kazakhstan. Consideration should also be given to all the carbon emissions associated with	Comment noted. The UK Government classifies nuclear as 'low carbon'. NPS EN-6, paragraph states: <i>Any new nuclear power stations consented under the Planning Act 2008 will play a vitally important role in providing reliable electricity supplies and a secure and diverse energy mix as the UK makes the</i>	No change.

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		<p>constructing a new nuclear build power station over a minimum period of eight to ten years. The process of decommissioning and dealing with waste is not carbon neutral. The statement that nuclear energy is affordable should also be questioned, reference The European Union Commissioner for Competition is currently conducting a full inquiry into the deal over the strike price between the EDF company and the Westminster Government for the Hinkley Point C.</p>	<p><i>transition to a low carbon economy.</i></p> <p>The County Council does recognise that the construction of the NNB will generate carbon emissions and as a result, it has included GP18 in the draft Wylfa NNB SPG which broadly seeks to mitigate climate change.</p>	
		<p>Objective on page 27 that NNB maintains and enhances the quality of life; that it concerns community identity and protects its distinctive environment is dubious. A new nuclear power station will not achieve these things. Significant numbers of construction workers, for example, will not conserve community identity.</p>	<p>Comment noted. The County Council is of the opinion that the NNB project promoter should seek to achieve the aim stated within Objective 4. The GPs contained within the draft Wylfa NNB SPG set out ways through which this objective can be realised and contain requirements for mitigation where significant negative effects may arise.</p>	No change.
	Topic Papers	<p>Note that 'weaknesses and threats' outweigh 'strengths and opportunities'. Topic Paper 9 waste - there is a very superficial reference to the need for the temporary storage of radioactive waste on the site amongst pages of detail regarding all kinds of domestic and building waste. As the intention with Wylfa B is to use higher density uranium fuel in the reactor over a longer period, the radioactive waste from the process would be twice as hot and twice as radioactive as the waste from the current fuel. As already mentioned, Horizon recognises that this waste will have to be stored on the site for 160 years, which is the sufficient period for the waste to cool before moving it to a waste burial site. It should be noted here that a site has not</p>	<p>Comment noted. The principles of nuclear power and the issue of nuclear waste storage fall outside the remit of the Wylfa NNB SPG and is a matter for UK Government and the Nuclear regulators. However, the draft SPG recognises that the issue has implications for the Island and that it is a matter which the County Council may wish to respond to within its Local Impact Report. In this regard, GP17 calls for the developer to provide information on likely effects and to mitigate any that are adverse. It does not require the project promoter to demonstrate that there will be no effects.</p>	No change.

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		<p>been identified for the waste generated from British nuclear establishments over the last sixty years, let alone an additional storage site for waste from third generation nuclear reactors. The deficiencies in this particular topic paper reflect the County Council's failure to identify the fundamental danger of nuclear energy. Even if a potential new nuclear power station generated electricity safely, the problem of protecting the poisonous radioactive waste which threatens human health and the environment for thousands of years is a key consideration. The totally inadequate examination of the topic of radioactive waste in Topic Paper 9 and in the main document does a great disservice to the residents of Anglesey.</p>	<p>Given comments received regarding waste and its storage, the County Council will be writing to Horizon requesting that these matters, which are outlined in the scope of the SPG, be covered in detail in the forthcoming PAC1 consultation.</p>	
Utilities		<p>In the main document in Section 4.7 Utilities, water supply is referred to in paragraph 4.7.3 as follows:</p> <p>“Welsh Water’s new Draft Water Resources Management Plan (2013) identifies that the Island would be in water supply/demand deficit in 2023/24 but that this deficit could be greater and occur earlier as a result of the operation of the nuclear power station.”</p> <p>This issue was raised from the direction of Horizon around two and a half years ago when there was mention of the need for considerably more water for the construction and operation of a new nuclear power station. Horizon was challenged at the time to reveal whether that meant creating a new reservoir. No clear answer was given, only an attempt to alleviate concerns by claiming that no new reservoir would be required. However, the content of paragraph</p>	<p>Comment noted. Responsibility for ensuring that there is sufficient water to supply the Island’s businesses and communities, including a proposed nuclear power station, is the statutory responsibility of Welsh Water. The quote taken from the Draft Water Resources Management Plan indicates that Welsh Water is aware of the potential for an increase in demand, both as a result of general development pressures and the specific demand pressure which may arise from the NNB. The requirement for any additional infrastructure necessary to meet any increase in forecast demand will be identified by Welsh Water. Should any new infrastructure require either planning or DCO consent, then applications will be submitted and the County Council and other stakeholders will have the opportunity</p>	No change.

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		<p>4.7.3 shows that there is a further threat to Welsh land in the need for considerably more water for Wylfa B. Horizon and Anglesey County Council should reveal where exactly will all the additional water come from. This section of the main document is an example of what lies beneath the surface with this massive project. As in the superficial and inadequate examination of the whole question of the generation and storage of radioactive waste, a minimum of information is provided to the public on the big questions.</p>	<p>to approve/refuse or comment.</p> <p>The draft Wylfa NNB SPG recognises that the NNB may require improvements to water infrastructure in order to ensure that existing communities and businesses are not negatively affected and GP15 sets out the Council's requirements in this regard.</p>	
		<p>It is a matter of concern to see Anglesey County Council acting as a servant to a major international company like Hitachi and its subsidiary Horizon. It is totally unacceptable that the Council is recycling the arduous propaganda of the nuclear industry. The attitude is one of jobs at any cost to the environment, to people's health, to the whole linguistic and cultural fabric of Anglesey. There is a more sensible route for Anglesey County Council to follow through promoting renewable energy in its many forms. Those varying technologies, whether wind, solar, tidal energy and so on, are maturing well and are becoming cheaper. They are not a threat to the environment or to people's health. Our duty to the generations that are to follow us is to choose that renewable route and to not impose a further massive burden on them through developing a new generation of nuclear power stations and generating a further mountain of poisonous waste which will be dangerous for thousands of years.</p>	<p>Comment noted. As noted above, the principle of nuclear power and the selection of Wylfa as a potential location was determined by the UK Government. It therefore falls outside the remit of the Wylfa NNB SPG to challenge the UK Government's decision. The County Council is aware that the construction and operation of such a facility could create significant negative effects and positive benefits to the Island's economy, communities and environment. It is in this context that the Council made the decision to prepare the SPG, the purpose of which is, amongst others, to provide advice and guidance on what the Council believes to be important local direct and indirect matters.</p> <p>The Council does acknowledge the potentially positive benefits that can be derived from renewable energy. The Council's Energy Island Programme is established to promote a wider range of energy technologies and to put Anglesey at</p>	No change.

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			the forefront of energy research and development, production and servicing. Technologies included within the Programme include wind, tidal, biomass and solar.	
A039	General	Many references to 'the Council hopes..' 'the promoter should..' which suggests that the Council has given its approval to the project and is prepared to hope for the best.	Disagree. The County Council is not the decision-making body with regard to the main site, nor can the Wylfa NNB SPG formulate new Council policy. The purpose of the SPG (as set out at paragraph 1.2.2) is therefore to guide both the applicant and the decision-maker as to the Council's expectations for the development.	No change.
	GP 17	<p>Question whether the Council is being entirely open about the issue of the interim storage of nuclear waste. In the first paragraph of GP17, the impression is given that the issue of interim storage is something to discuss after building the power station – if it is required as it were. In reality, the promoters would need assurance from the outset that they have the right to interim storage and the suggestion that this is something that has not already been decided upon raises suspicions.</p> <p>It would be good also to see a reference to the methods decided for moving this dangerous waste after the 'interim' period, however long this is.</p>	<p>Comment noted. The matter of nuclear waste storage falls outside the remit of the Wylfa NNB SPG and is a matter for UK Government and the Nuclear regulators.</p> <p>SPG paragraph 4.8.6 states that: <i>However, proposals for waste management facilities (such as interim storage) that either form part of the development of a NNB or constitute associated development should be considered.</i></p> <p>This text is taken from the Government's national planning statement NPS EN-6 (paragraph 2.11.5). In the circumstances which the Government outlines at 2.11.5, and which are therefore set out within the SPG, there would be the opportunity for the Council, as statutory consultee, to make comment within its Local Impact Report, or</p>	No change.

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			if associated development, make a decision on the acceptability of the proposal. GP17 is therefore drafted to provide guidance to the project promoter on the information that it will need to provide to justify any proposal.	
	Visions/Objectives/ Welsh Language and Culture	<p>The statement on page 25 [page 23 in the English version of the document] about the “New Nuclear Build at Wylfa enhancing local identity and distinctiveness” is one that is difficult to believe, and it is difficult to believe that anyone else would believe it either. And furthermore, the measures referred to in GP13, will be ineffective.</p> <p>It could be argued that economic development opportunities are more important than linguistic factors and it would be much more honest to acknowledge that than try to put forward such an unconvincing argument for linguistic conservation.</p>	<p>Comment noted. The purpose of the Wylfa NNB SPG is to provide guidance and advice that will lead to a maximisation of economic benefit to the Island. At the same time, the draft SPG seeks to support communities and protect the environment. The draft SPG recognises that there may be negative effects arising from the project and where these are likely to occur, it sets out suggestions for mitigation/compensation. These suggestions are not comprehensive and it will be the responsibility of the project promoter to identify measures to mitigate negative effects, or means of compensation. These measures will be considered by the County Council against the stated objectives of the SPG and headline guidance contained within the relevant GPs.</p>	No change.
	Transport	Why is there no reference in the guidance to measures to protect the people of Anglesey from the after effects of an accident? Neither the promoters nor the Council may be prepared to	Comment noted. GP7 states that the County Council may require measures to restrict construction working hours and require traffic management. Furthermore,	Add reference within SPG to the legislative procedures for emergency planning.

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		<p>acknowledge that an accident could happen nor would they want to alarm people through openly accepting such a possibility and therefore undermining their case for building on the Island in the first place. The lack of reference to crowd movement in an emergency is either neglect or an appalling lack of candour.</p>	<p>it states that conditions may be placed to control the routing of traffic and the total number of daily vehicle movements. Potential implications for the Island's and wider region's health (including hospitals) and emergency services are also required to be identified and resources provided (see GP23).</p>	
			<p>In the UK, the ONR determines the off-site emergency planning area for nuclear installations where there is a potential for an off-site release of radioactivity that may require implementation of countermeasures such as evacuation. This is carried out under the Radiation (Emergency Preparedness and Public Information) Regulations 2001 (REPPPIR).</p>	
			<p>In January 2014, ONR published revised principles for determining REPPPIR off-site emergency planning areas around nuclear licensed sites in the UK. This means that ONR considers local practical and strategic factors associated with implementing the plan when they determine the area. More information on the process used by ONR is available by visiting http://www.onr.org.uk/depz-onr-principles.htm.</p>	
			<p>Upon notification by ONR of the area requiring an emergency plan, the County Council consults all of the agencies with a role to play in its implementation.</p>	
			<p>Following consultation with the relevant</p>	

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			<p>agencies and the operators, the County Council has to produce its off-site emergency plan within 6 months. The plan will consider a range of countermeasures proportionate to the risks identified, including sheltering or evacuation. The plan will be tested in an emergency exercise that includes the Local Authority, the police, the regulator, the met office, public health bodies and other agencies that would be involved in an event. Decision to evacuate or shelter would be taken based on the specific factors presented on the day.</p> <p>The Local Authority Emergency Plan will be considered every three years, following the operator's identification of hazards on site and the risks they present to the public, or when the operator makes a material change to activity on the site. This means that any changes associated with nuclear new build will be considered under REPPiR.</p>	
A040: People Against Wylfa B	2. Purpose	Whilst accepting that the development is promoted and will be considered by the UK Government, there is no reason for the Council to support it.	Comment noted. The County Council and the Welsh Government both support the principle of development of a new nuclear power station at Wylfa. The County Council is fully aware of the potential adverse impacts that may be generated by such a scheme. In this context, the role of the Wylfa NNB SPG is to help ensure that any negative effects of the NNB project are	No change.

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			minimised and benefits enhanced.	
		Consultation on the SPG in advance of forthcoming LDP is too early. Furthermore, two LDP's should be planned to cover the 'with Wylfa' and 'without Wylfa' scenarios.	Disagree. The basis for the Wylfa NNB SPG is existing national and local planning policies. Although the SPG is not supplemental to the JLDP, which is currently being prepared, it does seek to be consistent with the direction of travel set out in the emerging plan. The JLDP is being prepared in the context of UK policy which supports the development of a nuclear power station at Wylfa. In consequence, it is not considered appropriate to prepare two JLDPs. Should the UK Government's policy change in respect of nuclear development at Wylfa then this may prompt an early review of the JLDP.	No change.
		SPG is flawed as it does not deal with the decommissioning of Wylfa B and makes little reference to nuclear waste.	Disagree. For the reasons already stated at para 1.2.6 of the draft Wylfa NNB SPG, the SPG does not consider the decommissioning of the NNB due to the difficulty in predicting the direction of future planning policy and the prevailing baseline socio-economic and environmental conditions which may apply at the time (likely to be in excess of 50 years from the present day).	No change.

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		No reference to emergency planning.	<p>In the UK the ONR determines the off-site emergency planning area for nuclear installations where there is a potential for an off-site release of radioactivity that may require implementation of countermeasures such as evacuation. This is carried out under the Radiation (Emergency Preparedness and Public Information) Regulations 2001 (REPPIR).</p> <p>In January 2014, ONR published revised principles for determining REPPIR off-site emergency planning areas around nuclear licensed sites in the UK. This means that ONR considers local practical and strategic factors associated with implementing the plan when they determine the area. More information on the process used by ONR is available by visiting http://www.onr.org.uk/depz-onr-principles.htm.</p> <p>Upon notification by ONR of the area requiring an emergency plan, the County Council consults all of the agencies with a role to play in its implementation.</p> <p>Following consultation with the relevant agencies and the operators, the County Council has to produce its off-site emergency plan within 6 months. The plan will consider a range of countermeasures proportionate to the risks identified, including sheltering or evacuation. The plan will be tested in an emergency exercise that includes the Local Authority, the police, the regulator, the met office, public health bodies and other agencies</p>	Add reference within SPG to the legislative procedures for emergency planning.

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			<p>that would be involved in an event. Decision to evacuate or shelter would be taken based on the specific factors presented on the day.</p> <p>The Local Authority Emergency Plan will be considered every three years, following the operator's identification of hazards on site and the risks they present to the public, or when the operator makes a material change to activity on the site. This means that any changes associated with nuclear new build will be considered under REPPiR.</p>	
		<p>Understand that a shorter version of the SPG was prepared for the public but not issued. Request additional round of consultation using a form easier to inform and digest.</p>	<p>Disagree. The County Council did not prepare a shorter version of the draft Wylfa NNB SPG and is of the opinion that the consultation on the SPG fulfilled the necessary statutory requirements, was comprehensive and appropriate.</p>	<p>No change.</p>
	3. Vision	<p>Disagree with the Vision. Jobs are not sustainable, quality of life will deteriorate and risk to unique character of the local area. Emphasis is too positive and little reference to the dangers associated with this type of development.</p>	<p>Disagree. The purpose of the Vision is to set out the County Council's aspiration for what it would like to achieve in the medium to long-term.</p>	<p>No change.</p>
	4. Objectives	<p>Do not agree with objectives:</p> <p>Objective 1. The Council is relying upon Wylfa B as the key plank in delivering the Energy Island</p>	<p>Disagree. The NNB is one of a number of projects that comprise the Energy Island Programme. Importantly, other proposed projects include offshore wind and tidal</p>	<p>No change.</p>

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		Programme. This is at the expense of 'green energy' alternatives. The example of Scotland shows that these can be key drivers for the economy. Respondent organisation has produced Manifestos Môn" which sets out how economic development can be supported on the Island.	energy schemes. To this end, Objective 1 of the draft Wylfa NNB SPG seeks to promote low carbon energy developments.	
		Objective 2. The project will bring in workers from outside of the Island and North Wales.	Comment noted. The County Council recognises that the NNB project will result in the in-migration of workers. In response, the draft Wylfa NNB SPG seeks to maximise employment opportunities generated by the project for local residents.	No change.
		Objective 3. Risks to local communities are greater than presumed benefits.	Comment noted. The County Council fully recognises that the Wylfa NNB project, if not properly planned, could adversely affect the Island's communities. However, the central aim of the draft Wylfa NNB SPG is to minimise adverse impacts and maximise benefits in this regard.	No change.
		Objective 4. Cannot see how quality of life for residents and visitors will improve.	Comment noted. This objective seeks to ensure that the quality of life of the Island's residents and visitors will be improved. This sets the overarching framework for the subsequent guidance contained in the draft Wylfa NNB SPG.	No change.
		Objective 5. Cannot see how influx in workers	Comment noted. This objective seeks to conserve and strengthen the Island's	No change.

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		will strengthen unique identity.	identity. This sets the overarching framework for the subsequent guidance contained in the draft Wylfa NNB SPG which includes measures designed to minimise the potential impacts of the influx of construction workers and ensure that the quality of life of the Island's residents and visitors will be improved.	
		Objective 6. Commendable objective but unrealistic.	Disagree. The purpose of the Wylfa NNB SPG is to ensure that infrastructure and facilities benefit the Island's communities whilst supporting the NNB project.	No change.
		Objective 7. Impossible to achieve.	Disagree. This objective seeks to ensure that the Wylfa NNB project conserves and enhances the Island's environment. This sets the overarching framework for the subsequent guidance contained in the draft Wylfa NNB SPG which include measures designed to minimise potential adverse impacts associated with the NNB project on the environment and maximise benefits.	No change.
	5. Guidance	Do not agree. Agriculture is not identified as a separate topic although 26.2% of businesses are in this sector.	Comment noted. Whilst the County Council recognises the importance of agriculture to the local economy, it is not considered necessary to include a specific	No change.

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			topic on this sector. GP3 seeks to protect existing businesses (which may include agricultural activities) whilst GP20 seeks to minimise the loss of the best and most versatile agricultural land.	
		It would be expected that the necessary structures for supporting the community and maintaining order would be dealt with under a separate topic.	Comment noted. The County Council considers that community infrastructure and services provision is adequately covered in Section 4.2 of the draft Wylfa NNB SPG.	No change.
		The document's precedent is that "significant adverse impacts" can be effectively mitigated. This is impossible because of the extremely dangerous nature of the nuclear industry, and also as this is such a massive project in a beautiful area with a relatively low population. Only reason for locating a nuclear power station at Wylfa is the fact that there is not a high population which would have to be relocated in the event of an accident. After all, it is reasonable to generate electricity as closely as possible to the area where the demand for it is highest, that is, in highly populated areas.	Comment noted. It is not the purpose of the Wylfa NNB SPG to make a judgement on the appropriateness of the Wylfa NNB project, the principle for which has been established in UK policy.	No change.
	6. Economic development	Do not agree. Precedent that Wylfa B is good for the Island is wrong. Concentration on Wylfa B has hampered economic development on the Island, references to Council's lack of a positive response to "Maniffesto Môn". Reliance on new nuclear with potential issues surrounding	Disagree. The NNB project is one of a number of projects that comprise the Energy Island Programme. Importantly, other proposed projects include offshore wind and tidal energy schemes.	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
		<p>subsidy (ref Hinkley C) means that the Council will have no fall-back position should it not happen.</p> <p>Comments on some individual Guiding Principals:</p>		
		<p>GP1. Nuclear is not low carbon when consideration is given to the construction process.</p>	<p>Comment noted. UK Government defines nuclear power generation as low carbon energy. The County Council recognises that construction activities are likely to lead to an increase in greenhouse gas emissions. In response, GP18 of the draft Wylfa NNB SPG seeks to minimise emissions through design and construction techniques.</p>	<p>No change.</p>
		<p>GP2. Whilst initially commendable it is based on the premise that Wylfa will be constructed.</p>	<p>Comment noted. The nature of the Wylfa NNB SPG is such that it assumes that the NNB project will come forward.</p>	<p>No change.</p>
		<p>GP3. Damage to land and environment will be inevitable. Why reference to decommissioning in contradiction to 1.2.6.</p>	<p>Comment noted. Reference to decommissioning in GP3 is in the context of associated development sites (a number of which will only be required during the construction period and will therefore need to be decommissioned) and not the NNB itself.</p>	<p>No change.</p>
		<p>GP4. Whilst there may be opportunities for local business, the experience when building Wylfa A</p>	<p>Comment noted. One of the key purposes of the Energy Island Programme is to</p>	<p>No change.</p>

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
		was a loss of employees who went to work there. Better to fund alternative economic development, reference to Siemens wind turbine factory.	increase the number of employment opportunities available to the Island's residents and increase levels of income. The draft Wylfa NNB SPG includes a number measures designed to support this aim. In this context, it is the County Council's aspiration that other forms of energy developments such as offshore wind also serve to improve income.	
	7. Tourism	Do not agree, it is not possible to create worse circumstances than the construction of a nuclear power station when seeking to maintain "An Island that cares for its natural assets and welcomes visitors". Question impacts on tourism as workers occupy hotels/B&Bs. It will be impossible for the developer to not have a detrimental impact upon the visitor economy and relying on Visit Wales is fooling the public.	Comment noted. The guidance contained in the draft Wylfa NNB SPG specifically seeks to ensure that NNB project does not adversely affect tourism including in respect of the accommodation sector.	No change.
	8. Population and Community	Do not agree and quotes: "The safety of the NNB is not considered further in this SPG". The reason given is that it is the responsibility of the Office for Nuclear Regulation and Natural Resources Wales to regulate safety. The County Council's job is to protect the health and lives of the residents of the Island. Therefore more interest in the topic should be taken. Questions raised with regard to emergency planning. Also essential to require long-term monitoring of people's health.	Comment noted. The draft Wylfa NNB SPG provides locally-specific guidance on existing national and local planning policy. NPS EN-6 (at para 3.2.10) sets out that the Planning Inspectorate should act on the basis that the regulatory regime will be properly applied and enforced to protect human health. The SPG cannot be a vehicle for new policy and is therefore unable to consider health impacts associated with operation of the NNB.	Add reference within SPG to the legislative procedures for emergency planning.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
		<p>Paras 4.3.10 to 4.3.13 and GP 9 refer to mitigating the impact of the influx of workers to the Island. It would not be possible to successfully integrate such an influx, and the nature of our communities would change forever, including an adverse effect on the Welsh language. It is not the individuals, it is the difficulty of integrating the numbers proposed.</p>	<p>Comment noted. An influx of construction workers associated with the NNB project is inevitable. In response, the draft Wylfa NNB SPG includes a range of guidance to support the integration of construction workers with the Island's existing communities. Additionally, the SPG seeks to ensure that employment opportunities associated with the NNB project benefit local residents which may help to reduce the number of workers from outside the Island.</p>	No change.
	<p>9. Construction Worker Accommodation</p>	<p>Do not agree. Question numbers of dwellings identified by Anglesey and Gwynedd Councils and states that housing numbers should be determined through direct consultation with local communities. Belief that the number of dwellings identified is driven by Wylfa B. Reference to previous request to develop two versions of the LDP. Build affordable homes, but numbers should be based on what is needed.</p>	<p>Comment noted. The housing requirements contained in the emerging JLDP are outside the scope of this SPG and will in any event be subject to separate consultation and consideration at Examination in Public. The draft SPG (at GP10) does, however, seek to ensure that construction worker accommodation does not have an adverse impact on the local housing market and that, where possible, this delivers a legacy by addressing local needs including for affordable housing.</p> <p>As noted above, it is not considered appropriate to prepare two JLDPs. Should the UK Government's policy change in respect of nuclear development at Wylfa then this may prompt an early review of the</p>	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
			JLDP.	
	10. Welsh Language and Cultural heritage	Do not agree. Grateful of Council's recognition of the Welsh language however disappointed that it is not given separate section and topic paper. It is essential that linguistic considerations should be part of the planning process. We believe that providing suitable jobs for local people is central to supporting the language, but if the price to pay is the in-migration of non-Welsh speakers then the Welsh language will weaken. It would be much better to try to develop a multifaceted and varied economy without over-reliance on one major employer or one specific sector. The scale of the Wylfa B project is too big to enable measures to support and strengthen the Welsh language and culture to succeed. Census figures show how difficult it is to do that under current conditions. It is likely that all attempts to learn Welsh and to integrate incomers will be unsuccessful, even if the developer contributes.	<p>Comment noted. The County Council agrees that Welsh language is a key planning issue. In this context, the draft Wylfa NNB SPG contains a separate section on Welsh language and culture (Section 4.5). The Welsh language is also captured in Topic Paper 10: Population and Community whilst the draft SPG itself has been subject to a Welsh Language Impact Assessment.</p> <p>An important objective of the draft SPG is to protect, and where possible enhance, Welsh language and culture (see GP13). However, it is not the role of the SPG to consider the principle of development of a nuclear power station at Wylfa which is established in UK policy.</p>	No change.
	11. Transport	Do not agree. Transport and traffic will be a nightmare as examples from other similar development across Europe testify. Even use of rail and water will not be sufficient to alleviate the increase in traffic	Comment noted. The draft Wylfa NNB SPG recognises that the Wylfa NNB project is likely to generate a substantial number of vehicle movements which could impact on the Island's existing transport network. In response, GP14 sets out the County's Council expectation that the project promoter will fully assess the transport impacts of the NNB and prepare a detailed Transport Plan. The draft SPG	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
			also identifies measures to help minimise the volume of traffic associated with the Wylfa NNB project and (drawing on existing evidence base work) where enhancements to transportation infrastructure network are likely to be required.	
	12. Utilities	Do not agree. The document recognises the pressure on utilities if Wylfa B is constructed. GP 15 identifies ways of mitigating the risks but, once again, the size of the project has to be questioned in an area like Anglesey. Who will be given priority if there is a shortage of water? Wylfa B? The residents of the Island? Other businesses on the Island? Dairy farmers? Why is there no mention that discussions have already been held with Welsh Water? This is so fundamental that it is almost unbelievable that it has not been discussed in detail up to now.	<p>Comment noted. As highlighted in this response, the draft Wylfa NNB SPG clearly identifies the need for the project promoter, in liaison with Welsh Water, to consider water demand and supply. In recognition of the importance of this issue, the Council also commissioned a Water Cycle Study which has highlighted that additional demand associated with the NNB project could place substantial pressure on water supplies.</p> <p>In response, GP15 and GP21 clearly set out the County Council's expectation for the project promoter/utility providers to upgrade infrastructure in a timely manner to ensure that there would be no shortage of water arising from the NNB project.</p>	No change.
	13. Waste	Do not agree. Wylfa B would generate new, additional, very radioactive radiotoxic waste for future generations and would be dangerous for hundreds of thousands of years. Why is Anglesey County Council (IACC) afraid to admit	Comment noted. The principle of development of a new nuclear power station has already been established by the UK Government in NPS EN-6. Para 2.11.5 of NPS EN-6 states that " <i>Proposals for</i>	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
		<p>and accept that Wylfa B will generate a vast amount of very dangerous, toxic and radioactive waste? Why does the County Council deny in its vision (section 3.1 of the main document) that they are eagerly welcoming and celebrating the generation of a mountain of additional nuclear waste at Wylfa, waste that the Council is praying will be moved to someone else's back garden in someone else's Community Council? The Council casually claims in paragraph 1.3.8 in Topic Paper 9: Waste that IACC has no statutory duty to provide facilities for nuclear waste whilst at the same time happily promoting the generation of a massive volume of very radioactive nuclear waste on Anglesey which will need to be isolated and stored for thousands of years affecting future generations. The subject of nuclear waste is given less space in the document than sustainable waste management. It is stated (para 4.8.6) "proposals for waste management facilities (such as interim storage) that either form part of the development of a NNB or constitute associated development should be considered". Is interim storage not the intention at Wylfa B, although the interim period is for a period of more than a century, therefore IACC should be part of the process? there is no justification for producing more radioactive waste when the problem of the disposal of existing waste has not been solved, evidence Cumbria's refusal as the location for long-term storage.</p>	<p><i>waste management facilities...should not be considered buy the IPC."</i> In consequence, there is limited scope for the Wylfa NNB SPG to consider the principle of nuclear waste generation and storage. The regulatory regime for the licensing and operation of new nuclear power stations in this regard is a matter for the Office for Nuclear Regulation (ONR).</p> <p>Notwithstanding, the County Council fully recognises public concerns with respect to the interim storage of waste and in this context GP17 of the draft SPG seeks to ensure that any proposals for such facilities do not have adverse socio-economic impacts. Further, given this response, and the comments of others regarding waste and its storage, the County Council will be writing to Horizon requesting that these matters, which are outlined in the scope of the SPG, be covered in detail in the forthcoming PAC1 consultation.</p>	

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
	14. Climate Change	Do not agree that nuclear is low carbon. Reference to mitigation during construction is disingenuous, if there was no development then no need to mitigate against the use of carbon in construction. Note (4.9.4) that the County Council supports renewable energy, and this is supported. The problem is that, up to now, the human and material resources have not been directed into this field.	Comment noted. As noted above, UK Government defines nuclear power generation as low carbon energy. The County Council recognises that construction activities are likely to lead to an increase in greenhouse gas emissions. In response, GP18 of the draft Wylfa NNB SPG seeks to minimise emissions through design and construction techniques.	No change.
	15. Natural Environment	<p>The site earmarked for Wylfa B is ten times bigger in land area than the existing Wylfa. It is therefore entirely inappropriate to talk about measures to mitigate the Wylfa B construction impacts on biodiversity, geodiversity and the landscape.</p> <p>We note that “almost the entire coastline of Anglesey is designated as an Area of Outstanding Natural Beauty” (para 4.10.1). It is</p>	<p>Comment noted. The site of the proposed new nuclear power station is identified in NPS EN-6 and in consequence the location of the NNB is not a matter for the Wylfa NNB SPG. The County Council recognises the potential for the construction and operation of the NNB to have substantial environmental impacts and in response, the draft SPG clearly sets out the position of the Council in respect of the need to conserve and enhance the Island’s natural environment (see GP20). GP26 also establishes a set of key development principles in relation to the main site which include measures to minimise adverse impacts arising from development at the main site on the Island’s natural environment.</p> <p>Comment noted. The coastal zone of the Anglesey Area of Outstanding Natural Beauty (AONB) was designated in 1966</p>	GP20, GP26 and supporting text to include reference to the Coastal Path.

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		very curious to note that one of the few exceptions to this is the area where it is intended to construct Wylfa B. To the layman's eye there is very little difference, if at all, between the adjoining areas and Wylfa Head, if you remove the existing power station. We would argue that this is very convenient for the site developer.	and confirmed in 1967 and is a national designation. Its designation is therefore not a matter for the County Council or the Wylfa NNB SPG. However, the draft SPG does include a requirement for the project promoter to minimise landscape and visual impacts associated with development at the main site in respect of the AONB (see GP26).	
		As previously mentioned, the Coastal Path is also in the area, and Wylfa B would have an adverse effect on the path.	Comment noted.	GP20, GP26 and supporting text to include reference to the Coastal Path.
		Central to this topic is the fact that there is no discussion whatsoever of the impact of radioactive material on the environment, on a large or small scale. This should be included.	See comment above.	No change.
	16. Historic Environment	The existence of Wylfa B would threaten the whole Historic Environment. In the event of a disaster such as Fukushima, we could forget the heritage of our forefathers. This would possibly mean not being able to hold the Prince of Wales' Investiture Ceremony at Caernarfon Castle.	Comment noted. As noted above, the principle of development of a new nuclear power station on Anglesey has already been established by the UK Government. The draft Wylfa NNB SPG does include specific guidance designed to conserve and enhance the Island's historic environment.	No change.
	17. Facilitating development	Do not agree. See comments listed in para 4.12.3. Not clear to us how all these measures	Comment noted. Following legal advice, the County Council is confident that it has	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
		will be funded – this should be transparent, and without the possibility of contamination and personal gain. Not persuaded that the idea that Community Benefit Contributions do not have any influence on the formal planning process is credible (para 4.12.5 and 4.12.6). Not in favour of using IACC statutory powers to promote Wylfa B. On the contrary, the powers should be used to halt the development. Certainly not in favour of using statutory powers to bully local residents in order to pave the way for an international commercial company to make a profit.	robust protocols to deal with statutory and non-statutory functions. A paper was presented to the County Council's Executive in November 2012 which clearly explains that non-statutory community benefits cannot be taken into account in statutory decision making processes. The County Council has since reviewed its internal governance arrangements and drafted internal and external protocols on how to deal with statutory and non-statutory community benefits. For further information see: http://democracy.anglesey.gov.uk/documents/s1180/Wylfa%20Nuclear%20New%20Build%20-%20Discharge%20of%20Function.pdf?LLL=0	
	18. Monitoring	Not confident that the implementation and monitoring will be effective as the Council appears to be wholly supportive of the project.	Disagree. The County Council has been actively supportive of the development due to its economic potential (i.e. job creation, skills, supply chain etc.). We will need to effectively monitor the conditions etc. in order to ensure that we are securing these benefits.	No change.
	19. Area Guidance	The main visual and practical impact will be on the area adjacent to Wylfa B. The construction phase will be a nightmare for local residents, and no measures to mitigate the adverse effects	Comment noted. As noted above, the principle of development of a new nuclear power station on Anglesey has already been established by the UK Government.	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
		will succeed, despite the Council and the developer's intentions. Again, this reflects the enormity of the whole project. As far as the rest of the Island is concerned, we believe that the Wylfa B development will have long term adverse effects in many respects, as described earlier in our evidence. For example, road works and then the traffic on them would have an adverse effect. Also reference to the issue of pylons across the Island which would be specifically constructed as a result of Wylfa B. All areas are under some kind of threat if Wylfa B is constructed.	One of the key objectives of the draft Wylfa NNB SPG is to minimise impacts arising from the NNB project (both in Cemaes and across the Island) and maximise benefits.	
A041	Purpose	Do not understand the purpose. Surprised to see statements on the display boards in favour of the proposed development. Therefore question the value of the consultation especially as people are seriously concerned about following the disasters that have caused death and ill-health on a massive scale. It appears that the Council is not acting impartially.	Disagree. The purpose of the Wylfa NNB SPG cannot extend to comment upon the merit of new nuclear at Wylfa which is a matter dealt with at the national (UK) level. However, the County Council does recognise that there is the potential for positive economic benefits to arise provided they are properly planned. The purpose of the SPG therefore is to set out what the Council will require of the project promoter in order for it to prepare its Local Impact Report and respond positively to any planning applications for associated development.	No change.
	Vision	Consultation is false and is seeking to facilitate the development. The project will result in the creation of pollution which will be dangerous for many years.	Disagree. The consultation is a statutory requirement. The issue of long-term pollution resulting from the storage of nuclear waste lies outside of the remit of the Wylfa NNB SPG and is a matter for the Nuclear Regulators.	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
	Objectives	Do not agree with objectives, the Council is campaigning in favour of the development and appears willing to allow waste to be stored for many years to come.	Disagree. The purpose of the Wylfa NNB SPG is to set out what information the County Council will expect the project promoter to provide when submitting the DCO and any Town and County Planning applications. In addition, it sets out policy guidance, based upon existing adopted policy, to advise the project promoter on the appropriateness of any sites they may consider bringing forward as part of the wider project. The Council's ability to act as decision maker with regard to the storage of nuclear waste is limited and would only arise if the project promoter decided to submit a specific application that would be classified as 'associated development'. Otherwise, the remit to decide upon the appropriateness of waste storage lies with the Nuclear Regulators.	No change.
	Identified topic areas	This is a false consultation. This is just a public relations exercise to facilitate the development.	Disagree. The consultation seeks to gain feedback on the draft Wylfa NNB SPG and supporting documents. Responses received will be considered and changes made to the SPG where appropriate. The remit of the SPG does not extend to the appropriateness or otherwise of the NNB project.	No change.
	6. Economic Development	The current power station has not brought prosperity or development to the Island. After 40 years of Wylfa the Island's northern coast is amongst one of the poorest areas of the Britain.	Comment noted. One of the key objectives for producing the Wylfa NNB SPG is to ensure the maximisation of economic benefits that may arise from the NNB. This is one of the drivers behind the County Council's establishment of the Energy Island Programme and success in the subsequent award of Enterprise Zone	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
			status.	
	7. Tourism	Tourists will keep away from the Island's northern coast with an even bigger power station spoiling the views and with possibly tonnes of dangerous pollution being stored on the site.	Comment noted. The Wylfa NNB SPG requires the project promoter to assess the potential for negative impacts upon the Island's visitor economy and to put in place measure to ensure that any identified negative effects are mitigated/compensated for.	No change.
	8. Population and Community	The strategy behind the current power station has failed to bring economic growth to the Island over the last 40 years. Young people are leaving to seek work and salaries and employment levels are amongst the lowest in Britain	Comment noted. As noted above, one objective of the Wylfa NNB SPG is to ensure that the potential for economic benefits arising from the NNB are maximised (see GP1 and GP2 of the draft SPG).	No change.
	13. Waste	The proposed development will produce tonnes of pollution which will be dangerous for many years if not centuries to come. Neither the Council nor anyone else can be certain that future generations will be able to deal with this increasing pollution.	<p>Comment noted. The matter of nuclear waste storage falls outside the remit of the Wylfa NNB SPG and is a matter for UK Government and the Nuclear regulators.</p> <p>SPG Paragraph 4.8.6 states that: <i>However, proposals for waste management facilities (such as interim storage) that either form part of the development of a NNB or constitute associated development should be considered.</i></p> <p>This text is taken from the Government's national planning statement NPS EN-6 (at paragraph 2.11.5). In the circumstances which the Government outlines at 2.11.5, and which are therefore set out within the draft SPG, there would be the opportunity for the Council, as statutory consultee, to</p>	Reference to potential radiological effects and the need to assess them to be included in GP17.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
			make comment within its Local Impact Report, or if associated development, make a decision on the acceptability of the proposal. The GP17 is therefore drafted to provide guidance to the project promoter on the information that it will need to provide should they seek to justify any proposal.	
	14. Climate Change	The Island is an ideal place to develop renewable energy rather than focusing so much on a power station. If only some of the money and effort wasted on a power station was put towards renewable energy it would be of great benefit to the climate.	Comment noted. The County Council recognises the Island's inherent advantages for the generation of renewable energy. This is why the Council developed the Energy Island Programme which seeks to harness the rich mix of energy streams, including nuclear, wind, tidal, biomass and solar; together with associated servicing projects, which the Council considers provide major potential to achieve economic, social and environmental gains for Anglesey and the wider North Wales region. With reference to the Wylfa NNB SPG SPG, GP18 requires that proposals incorporate on-site renewable where viable.	No change.
	15. Natural Environment	Do not agree.	Comment noted.	No change.
	17. Facilitating development	Public relations exercise to facilitate one outcome. Just an opportunity for the public to influence relatively trivial details. In the meantime, the consultation organisers are working towards realising a specific outcome, that is, to permit the development.	Disagree. The County Council is required to consult on the Wylfa NNB SPG. Comments received are considered and amendments will be made to the document as appropriate.	No change.
A042	Purpose of SPG	Agree.	Comment noted.	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
	3. Vision	<p>I am very concerned about the waste storage implications. A period of 75 years has been stated, but I understand the true period for storage of hot waste on the site is 160 years. There is a need to be clear about this. Neither is there an explanation of how it will be stored i.e. as is the case in France in concrete casks within concrete buildings, of an equivalent size to two football pitches? Long term waste storage – 2,000 years – underground in the local area?? On the basis that local people will benefit from the jobs which will come as a result of the power station?? What about the proximity to the Llyn Alaw reservoir? With a significant increase in annual rainfall, how will it ever be possible to have a safety report on “water seepage” levels, or a report on expected sea levels? Neither are there any details about waste ownership. Will it just be waste from the New Wylfa which will be stored there, or will waste from other areas be transported there? Who will pay the financial cost of storing the waste? Who will be responsible for keeping it safe bearing in mind the periods of 160 years in the short-term and 2,000 years in the long-term? How can responsibility be guaranteed over such considerable periods of time? In the event of an accident, who is responsible? Who is responsible for implementing the plan to evacuate the population safely? Who will compensate the population and pay to deal with the toxic effects?</p> <p>Inappropriate to look at the short-term benefit when the long-term implications have not been solved.</p>	<p>Comment noted. The County Council recognises the concern expressed by local communities with regard to the issue of nuclear waste. However, the matter of long-term storage falls outside the remit of the Wylfa NNB SPG and is a matter for UK Government and the Nuclear regulators (with the exception of the particular circumstance referred to in NPS EN-6 and GP17 of the draft SPG).</p> <p>Given comments received regarding waste and its storage, the County Council will be writing to Horizon requesting that these matters, which are outlined in the scope of the SPG, be covered in detail in the forthcoming PAC1 consultation.</p>	<p>Reference to potential radiological effects and the need to assess them to be included in GP17.</p>

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
	4. Objectives	6,000 jobs are short-term and temporary and will not solve the Island's economic situation. The Island will suffer the effects of "boom & bust" exactly as it happened when the last power station was built. The last power station did not succeed in keeping the young people of the Island here. SPG should provide further consideration to the island's economy following the construction phase. What impact will the presence of the New Wylfa and the nuclear waste store have as tourism businesses or food businesses seek to attract investment to the island?	<p>Comment noted. One of the implicit objectives for producing the Wylfa NNB SPG is to ensure the maximisation of economic benefits as a result of NNB project. This is one of the drivers behind the County Council's establishment of the Energy Island Programme and success in the subsequent award of Enterprise Zone status.</p> <p>The draft SPG, at GP2, seeks to ensure that local communities are provided with the education and skills appropriate to take advantage of the employment opportunities offered by the NNB project, both during its construction and operation. Furthermore, up-skilling should support routes into the renewable sector which forms a second, important element of the Energy Island Programme.</p>	No change.
	5-10	Disagrees with questions posed, refers to previous questions posed.	Comment noted.	No change.
	11. Transport	Comments that the A55 has already defaced Anglesey and that another major road defacing the east coast is not required. The Island is too small to be able to cope with such a big power station and with vast motorways. The impact of these on the tourism economy would be damaging.	Comment noted. The draft Wylfa NNB SPG (see GP14) sets out the County Council's position with regard to transportation which is that the project promoter should prioritise both rail and water over road. Where improvements to the road system are required, these should be proportionate and the Council will take into account the potential for effects upon the environment (including landscape) when considering their suitability.	No change.
	12-18	Disagrees with questions 12-18.	Comment noted.	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
	19 Area Guidance	SPG consultation suggests that Anglesey is on its knees and has no option but to accept the nuclear industry. This is an incorrect precedent. A toxic nuclear waste store is not the future for the Island. No other County in the country would welcome such a future, but the lack of detail about the waste creates uncertainty about the direction this council is taking.	<p>Comment noted. The County Council does not recognise the state of the economy as presented by the respondent. However, the Council does acknowledge that as part of the wider Energy Island Programme, the NNB can have positive economic benefits if appropriately planned. The Council is aware of the issue of nuclear waste however, the regulatory regime for the licensing and operation of a waste storage facility is the responsibility of the nuclear regulator.</p> <p>Given comments received regarding waste and its storage, the County Council will be writing to Horizon requesting that these matters, which are outlined in the scope of the SPG, be covered in detail in the forthcoming PAC1 consultation.</p>	Reference to potential radiological effects and the need to assess them to be included in GP17.
A043	Construction Phase	6,000 workers which will be substantially from outside of North Wales will have a significant negative effect upon the Welsh language.	<p>Comment noted. The County Council recognises the potential for negative impacts upon the Welsh language and GP13 of the draft Wylfa NNB SPG sets out a requirement for the project promoter to prepare a language impact assessment of appropriately scaled proposals. Furthermore, if negative effects are identified, the Council will require the project promoter to provide mitigation measures.</p>	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
	The site	Wylfa B site is ten times bigger than the current Wylfa site. Such a huge project would have a detrimental effect on the tourist industry on Anglesey, particularly along the northern coast. Questions who may come on holiday to an area with the one of the biggest construction projects in Europe.	Comment noted. The County Council recognises the potential for negative impacts upon the tourism industry as a result of the NNB project and sets out a number of GPs that directly or indirectly address this issue in the draft Wylfa NNB SPG. Section 4.2 and GP5 of the draft SPG, for example, address the potential for direct effects upon the tourism industry and it requires the project promoter to ensure that activities do not adversely affect the sector. Where the potential for negative effects are identified, the Council will require the project promoter to set in place mitigation and/or compensation measures.	No change.
	Emergency arrangements	Asks how the Council and developer would handle a serious emergency and radioactive discharge from Wylfa B and how the Island be evacuated.	<p>Comment noted. In the UK the ONR determines the off-site emergency planning area for nuclear installations where there is a potential for an off-site release of radioactivity that may require implementation of countermeasures such as evacuation. This is carried out under the Radiation (Emergency Preparedness and Public Information) Regulations 2001 (REPPPIR).</p> <p>In January 2014, ONR published revised principles for determining REPPPIR off-site emergency planning areas around nuclear licensed sites in the UK. This means that ONR considers local practical and strategic factors associated with implementing the plan when they determine the area. More information on the process used by ONR is available by visiting http://www.onr.org.uk/depz-onr-</p>	Add reference within SPG to the legislative procedures for emergency planning.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
			<p>principles.htm.</p> <p>Upon notification by ONR of the area requiring an emergency plan, the County Council consults all of the agencies with a role to play in its implementation.</p> <p>Following consultation with the relevant agencies and the operators, the County Council has to produce its off-site emergency plan within 6 months. The plan will consider a range of countermeasures proportionate to the risks identified, including sheltering or evacuation. The plan will be tested in an emergency exercise that includes the Local Authority, the police, the regulator, the met office, public health bodies and other agencies that would be involved in an event. Decision to evacuate or shelter would be taken based on the specific factors presented on the day.</p> <p>The Local Authority Emergency Plan will be considered every three years, following the operator's identification of hazards on site and the risks they present to the public, or when the operator makes a material change to activity on the site. This means that any changes associated with nuclear new build will be considered under REPPiR.</p>	
	Waste	Considers that Topic Paper 9: Waste is flawed given lack of significant reference to nuclear waste and states that the UK Government does not have an underground store to keep the toxic waste from the last 60 years let alone an entirely	Comment noted. The County Council recognises the concern expressed by local communities with regard to the issue of nuclear waste. However, the matter of long-term storage falls outside the remit of	Reference to potential radiological effects and the need to assess them to be included in GP17.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
		separate one for very dangerous waste from possible new power stations such as Hinkley C and Wylfa B.	the Wylfa NNB SPG and is a matter for UK Government and the Nuclear regulators (with the exception of the particular circumstance referred to in NPS EN-6 and GP17 of the draft SPG).	
A044	General	Objects to the building of Wylfa B and considers that money would be better invested in renewables, particularly tidal.	Comment noted. The purpose of the Wylfa NNB SPG is not to determine the principle of nuclear development at Wylfa, which is a decision taken by the UK Government. The County Council does recognise the important part which renewable energy has to play in the economic development of the Island and to this end the Energy Island Programme sets out to promote industries such as off shore wind, tidal, biomass and solar.	No change.
		The development generates toxic waste, impacts of construction will be detrimental to the Welsh language and evidence from Wylfa A suggests that these types of project do not benefit the Welsh economy.	Comment noted. The issue of nuclear waste lies outside the remit of the Wylfa NNB SPG and is a matter for national policy. The County Council accepts that there may be impacts upon the Welsh language and economy and it has therefore prepared a suite of Guiding Principles within the draft SPG to guide the project promoter as to the information that the Council will expect to receive and the requirements for mitigation where any negative impacts are identified.	No change.
		Public money should be diverted from nuclear fission to nuclear fusion.	Comment noted. The matter of public subsidy lies outside the remit of the Wylfa NNB SPG.	No change.
A045	General	Although there is a role for Anglesey County Council in influencing the decision (and refusing	Comment noted. The purpose of the Wylfa NNB SPG is not to determine the principle	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
		it), it can be seen in 1.2.4 that the SPG and each of the topic papers support the project and avoid giving a response to any argument against the project even when noted in the document.	of nuclear development at Wylfa, which is a decision taken by the UK Government. The NNB is one of a suite of energy technologies which constitute the Energy Island Programme. The County Council believes that this could contribute nearly £25 billion to the Anglesey and North Wales economies over the next 15 years. It is considered to represent a once in a generation opportunity to give the economy a tremendous boost.	
	Waste	The problem of radioactive waste is hidden within the service that deals with domestic waste, building, commercial and industrial waste. It is totally misleading to use as one of the Strengths "Existing policy in place to govern radioactive waste disposal." There may be a "policy" but there is no existing facility for radioactive waste disposal although, when Wylfa A was established, people were led to believe that there would be an adequate facility to treat and store radioactive waste.	Comment noted. The issue of nuclear waste policy and storage is a matter for UK Government and lies outside the remit of the Wylfa NNB SPG. Given comments received regarding waste and its storage, the County Council will be writing to Horizon requesting that these matters, which are outlined in the scope of the SPG, be covered in detail in the forthcoming PAC1 consultation.	Reference to potential radiological effects and the need to assess them to be included in GP17.
		The SPG and topic papers use misleading language. For example, where there is an impossible problem to solve the County Council is going to "mitigate adverse effects" where they should undoubtedly protect community interests through their prevention.	Disagree. The objectives of the Wylfa NNB SPG are written such that the County Council requires the project promoter to 'ensure' that certain matters are addressed. Notwithstanding, the GPs recognise that in certain cases adverse effects may be caused as a result of development. In these instances the County Council requires the developer to identify and commit to mitigation and/or compensation.	No change.
		The SPG states that the NNB "provides a once	Comment noted. The NNB forms part of a	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
		in a lifetime opportunity to transform the economy and communities of the island". The same thing was said when Wylfa A was established. If so, how is it that Anglesey has the lowest GVA in Britain? Further to that, there is sufficient evidence that the significant influx during the construction phase damaged the Welsh language.	wider County Council initiative, the Energy Island Programme. By acting proactively the Council believes that it can secure significant economic benefit as a result of the projects currently planned for the Island. The draft Wylfa NNB SPG sets out the Council's policy guidance and is a key tool to ensure that these benefits are realised.	
A046	General	The Council is not taking its response to residents seriously, asking how will it respond to emergencies, including terrorist attack.	Comment noted. In the UK, the ONR determines the off-site emergency planning area for nuclear installations where there is a potential for an off-site release of radioactivity that may require implementation of countermeasures such as evacuation. This is carried out under the Radiation (Emergency Preparedness and Public Information) Regulations 2001 (REPPiR).	Add reference within SPG to the legislative procedures for emergency planning.
		It does not properly consider the impacts upon the Welsh language, tourism, health, housing and the environment. Most serious is the issue of nuclear waste. Whilst appreciating the need for economic development the suggestion is that this could be better delivered through an emphasis upon renewable energy.	Comment noted. The Wylfa NNB SPG contains objectives and GPs which do address the issues referred to. The matter of nuclear waste is one which is the lead responsibility of UK Government and the nuclear regulators and as such falls outside the remit of the SPG. However, given comments received regarding waste and its storage, the County Council will be writing to Horizon requesting that these matters, which are outlined in the scope of the SPG, be covered in detail in the forthcoming PAC1 consultation.	No change.
A047	5 Project Wide Guidance	Lack of understanding of the Welsh language's linguistic-community needs in this report, as in all previous reports, and this will now be	Comment noted. The Wylfa NNB SPG must be aligned with existing national and local planning policy and in consequence, it	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
		<p>explained. 3.2 provides a broad but again, very misleading outline of the Welsh language situation on Anglesey in 2011, due to use of Electoral and not Community Wards. The map should have been based on the Communities and also the Wards within them in order to get the most accurate picture possible. However, it at least gives a broad idea of the Welsh language situation on Anglesey as a community language, although areas such as Bodedern through its inclusion under the same area as the RAF site and its vicinity comes out lower than it should be. Practically therefore, consideration should be given to the three highest tiers, 71.2--80.0, 62.0-71.1 and 52.5-61.0 as the Welsh Language Hubs on Anglesey, together with areas such as the communities of Bodedern.</p> <p>Regional-Community language policies should be developed on Anglesey as a basis to all developments in all fields. Unless this is done, the destruction will continue, through a lack of understanding about the remaining Welsh communities on Anglesey.</p> <p>To prevent the demise of the Welsh language as a viable community language, planning and development policy in relation to the most Welsh areas of Anglesey – Môn Gymraeg – has to be transformed. The main community centre of Môn Gymraeg is Llangefni, but respondent's research shows, an increasing language shift has been underway in the town since c. 1997 because of an increase at that time in the percentage of non-Welsh speakers moving to the town. Respondent states that this is a result of 'blind' economic policies which attracted 'key workers' to the town into the higher tiers of businesses</p>	<p>is not considered appropriate for it to develop new regional-community language policies or to provide a policy response to the strategic issues identified in this response (e.g. in respect of the quantum of housing growth), many of which are wider, non-planning matters. However, a key objective of the draft Wylfa NNB SPG is to conserve and promote the Welsh language and culture (see in particular GP13).</p>	

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
		<p>and services without any workplace language policy, as in Quebec and Flanders. There are a number of potential intermediate Môn Gymraeg centres. Bodedern – a centre which could have developed to become a secondary Môn Gymraeg township by today, which would have protected the Welshness of Bro Alaw and the communities of Caergeiliog, Bryngwran and Gwalchmai.</p> <p>With regard to 4.1, Planning Policy could be developed for the future: no house building in these areas unless there is a real local need and on the basis of preventing a language shift. Education Policy: Establishing Welsh Medium Community Schools across the whole age range in these centres. Community Health Policy: Relocation, similarly where medical services are required. Developing a long-term Community Development Policy in these communities. Securing legislation through the Welsh Senedd to make the Welsh language an increasingly essential language in jobs which involve working with the public. Moving towards Welsh medium public signage in Môn Gymraeg communities (also with symbols as required for non-Welsh speakers) over the next decade.</p> <p>This will be the long-term impact of the Menai Hub, up to Llangefni and across to Brynsiencyn and Newborough and Aberffraw as a result of economic development which could be detrimental to the Welsh language in the areas where it has the best chance of surviving.</p>		
	7. Tourism	Must guard against breaking the law again as in the case of Penrhos head.	Comment is not valid. No law has been broken and the County Council is confident that the decision made in respect of Land &	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
	11. Transport	<p>Recommended cost-effective solution for Anglesey and Arfon would be to establish what is known as Statsbahnen (Tram-trains), out of Bangor City to Llangeferni and over to Bethesda and Caernarfon initially and then, in due course, to Llanberis and Penygroes and over to Holyhead and to Amlwch. With a park and ride facility particularly in the vicinity of Bangor e.g. Llanfairpwllgwyngyll, Llangeferni and Felinheli.</p> <p>For Britannia Bridge, recommends changing the direction of three lanes according to traffic flow. Also, serious consideration should be given (on a European level) to developing a transcontinental freight transport arrangement via rail from Holyhead to ports in the east of England e.g. Hull, Harwich and Dover.</p>	<p>Lakes is legally sound and robust.</p> <p>Comment noted. The draft Wylfa NNB SPG, at GP14, sets out the Council's priorities with regard to transport which are that the project promoter should favour rail and water over road. The draft SPG at paragraph 4.6.6 recognises also that the Menai crossing, and Britannia Bridge are close to existing capacity at peak times with highest traffic volumes in the summer. The GP requires that the project promoter look to explore opportunities to deliver co-ordinated infrastructure improvements taking into account other strategic investments.</p>	No change.
	18. Implementation and Monitoring	<p>Questions the strategy in the event of a serious radioactive discharge or in the case of an incident which destabilised existing reactors or any in the future? Asks about the evacuation policy for the two Islands.</p>	<p>Comment noted. In the UK, the ONR determines the off-site emergency planning area for nuclear installations where there is a potential for an off-site release of radioactivity that may require implementation of countermeasures such as evacuation. This is carried out under the Radiation (Emergency Preparedness and Public Information) Regulations 2001 (REPPiR).</p> <p>A fuller answer is provided to similar questions raised above.</p>	Add reference within SPG to the legislative procedures for emergency planning.
A048	2. Purpose of SPG	<p>Understands the purpose but questions the appropriateness of developing nuclear power on the Island, given the potential for long-term effects arising from climate and geological</p>	<p>Comment noted. The principle of nuclear power at Wylfa is outside the remit of the Wylfa NNB SPG and is a matter for UK Government policy, the most relevant being NPS EN-6. Volume 2, Annex C to</p>	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
		change.	NPS EN-6 sets out the lists of sites considered appropriate by UK Government, which has taken into account issues such as climate change.	
		Furthermore, questions the wisdom of holding a consultation on Wylfa before completing joint planning matters between Gwynedd and Anglesey, and indeed before the final decision is made on the proposed reorganisation of Local Government in Wales.	Disagree. The Wylfa NNB SPG is not supplemental to the JLDP, although it has been drafted in reference to the draft JLDP Preferred Strategy. The need for SPG to be in place early in the development of the NNB project is critical to ensure that positive benefits are maximised and negative effects minimised. It would not therefore be appropriate to wait for the adoption of the JLDP nor any potential local government reorganisation.	No change.
	3. Vision	Recognises the huge potential for the Energy Island but requests that the Council 'thinks outside the box' and focuses upon marine technologies with possibly gas and biomass at Rhosgoch.	Comment noted. The Energy Island is a wide ranging programme which includes for biomass and marine technologies as well as nuclear.	No change.
	4. Objectives	Recommends reference to the use of train-trams and means to mitigate congestion on Britannia bridge including a second level. No reference to longevity of nuclear waste under relevant objective.	Comment noted. It is not considered appropriate for the Wylfa NNB SPG to reference specific transport proposals, which may or may not be capable of being funded/delivered by the project promoter. However, the draft SPG (at GP14) prioritises rail and water over road and seeks to ensure that any investment made by the project promoter takes into consideration wider strategic transport initiatives.	No change.
	Economic Development	Refers back to Wylfa A and the lack of any economic benefit which resulted. Refers to the problems of in-migration during its construction.	Comment noted. At GP1 and GP2 the draft Wylfa NNB SPG sets out policy guidance designed to minimise any	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
		Little attempt is made to explain how much of the workforce from Anglesey will 'really' be employed during the construction phase or what skills grades they could be expected to fulfil. Encourages the adoption of maritime energy technologies.	negative economic effects and maximise benefits. In particular, at GP2 it sets out the Council's requirements of the project promoter to support education and skills development to enable local communities to take advantage of the potential economic benefits that may be available during both the construction and operational phases of the NNB.	
	Population	Questions the procedures in the event of a nuclear accident. Also raises the issue of Welsh language and a need to understand the pattern of change in the communities within which the language is spoken since the 1930's. Notes that by the 1990's it was being replaced in common usage by English in Llangenfi.	Comment noted. The issue of evacuation procedure is a matter for the ONR and has been responded to in answers above. The County Council is aware of the changing geographical profile of Welsh speaking communities on Anglesey and the issue of the Welsh language, its importance to the community identity of the Island and its culture is addressed within GP13 of the draft Wylfa NNB SPG.	Add reference within SPG to the legislative procedures for emergency planning.
	Construction Workers Accommodation	Requests that construction workers not be accommodated within the predominantly Welsh speaking communities on the Island. Requires that Extremely Sensitive Linguistic Area and Sensitive Linguistic Areas be recognised and afforded similar levels of policy protection to National Parks.	Comment noted. When assessing the appropriateness of locations for construction workers accommodation the County Council will expect that larger sites (50+ units) be located within the larger settlements of Holyhead, Amlwch and Llangefni (see GP10). These larger settlements have a level of service provision generally appropriate to the scale of construction worker accommodation required. Where additional facilities are needed, the Council will expect the project promoter to provide them, ensuring that there is a legacy use for the local community in the future. The provision of new or improved facilities should support the retention of local populations within	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
			communities.	
	Welsh Language	<p>Recommends the use of Community Linguistic Planning and defining areas of Anglesey as 'Môn Gymraeg' which should include the communities of the whole of Central or the Heartland of Anglesey.</p> <p>As regards 'Môn Gymreig', some broad suggestions are given below:-</p> <p>Bro Cybi - Môn Gymreig: Holy Island, Llanfair-yn-Neubwll and Llanfaelog.</p> <p>Bro Parys - Môn Gymreig: Llanbadrig, Amlwch and Penysarn.</p> <p>Bro Goronwy - Môn Gymreig: Moelfre, Benllech and Pentraeth.</p> <p>Bro Aethwy - Môn Gymreig: Beaumaris and Menai Bridge</p>	<p>The allocation of Sensitive Linguistic Areas is considered to be outside the scope of the SPG and would be a matter for consideration as part of the preparation of the JLDP.</p> <p>Comment noted. The points raised lie outside the scope of the Wylfa NNB SPG and are considered to be a matter for consideration as part of the preparation of the JLDP.</p>	No change.
	Implementation and Monitoring	Recommends the preparation of a Public Protection Plan and monitoring of the Welsh Language situation.	Comment noted. GP25 sets out the need for systems to be put in place to monitor the effects of the NNB. Whilst it is recognised that it does not specify the topics that should be considered for monitoring, the County Council would fully expect indicators and targets to be identified in respect of the Welsh language.	No change.
A049	General - Advantages	Questions the number of jobs anticipated (6,000) and the lifetime of the operation phase (40	Comment noted. The figures of 6,000 construction jobs and 1,000 permanent	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
		years).	<p>jobs are those which have been quoted by Horizon Nuclear Power. More detail will be provided in their Stage 1 Pre-Application Consultation (PAC1) which is scheduled for September 2014.</p> <p>A generation life span for Wylfa Newydd of 40 years is a figure quoted by Horizon which again will be confirmed through the PAC 1 consultation.</p>	
	General – Disadvantages	References the production and storage of high and low grade nuclear waste. Also, the increase in traffic that will arise, the increase in noise and pollution, the visual effects of such a large building and the effects of the pylons which will be required to transmit the power. Also raises questions over who is paying for the project and for subsequent decommissioning, effects on the Welsh language, means to evacuate the Island in the event of an emergency and how the project will be able to adapt to the issue of climate change. Comments that nuclear is an old technology.	<p>Comment noted. The matter of nuclear waste storage lies outside the remit of the Wylfa NNB SPG and is the responsibility of the UK Government and the Nuclear regulators.</p> <p>The draft SPG recognises the potential for increases in traffic as a result of the construction of the NNB and seeks to prioritise rail and water over road transport.</p> <p>The visual impact of pylons lies outside of the scope of the SPG and would be subject to a separate DCO application.</p> <p>The cost of the development will be borne by Horizon. As part of the site licensing process referred to in point 1 above, Horizon would need to submit a detailed decommissioning plan and demonstrate a commitment to fund a bond to cover the cost of decommissioning.</p> <p>Welsh language Impact is at the heart of the draft SPG. The overall document itself has been the subject of a Welsh Language Impact Assessment and specific aspects of development will also be subject to detailed</p>	<p>Reference to potential radiological effects and the need to assess them to be included in GP17.</p> <p>Add reference within SPG to the legislative procedures for emergency planning.</p>

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
			<p>Welsh Language Assessments. The draft SPG (at page 63, Section 4.5) sets out guidance in respect of Welsh Language and Culture.</p> <p>Means to evacuate the Island are the responsibility of the ONR which determines the off-site emergency planning area for nuclear installations where there is a potential for an off-site release of radioactivity that may require implementation of countermeasures such as evacuation. This is carried out under the Radiation (Emergency Preparedness and Public Information) Regulations 2001 (REPPiR). A fuller answer is provided in response to similar questions raised by other respondents above.</p> <p>Climate Change is a specific topic within the draft SPG (please see page 75, section 4.9).</p> <p>Nuclear power is considered by the UK Government to be an essential part of the mix of energy generation required by the UK. The principle of nuclear power lies outside the remit of the SPG.</p>	
A050	General 8. Construction Workers Accommodation	Agrees with questionnaire questions 2- 7, 9, 17. The arrival of workers could have a significant effect upon the three GP surgeries in Holyhead. Existing GPs have a current, average patient role of 1940 and the arrival of workers will increase the pressure on existing health services.	Comment noted. Comment noted. Topic Paper 8 paragraph 4.5.3 identifies average GP lists across Anglesey as being in the region of 1400 patients per GP. On this basis, lists of 1900+ would be considered to represent a high GP to patient ratio in the context of Anglesey.	No change. Include reference within the supporting text to GP27 to the importance of adequate healthcare provision in Holyhead.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
			The draft Wylfa NNB SPG recognises the potential for the NNB project to give rise to effects upon the ability of existing healthcare services to handle an increase in population as a result of the construction workforce at GP6. GP23 and bullet points under paragraph 4.12.3 also identify a potential requirement for the project promoter to contribute towards community facilities including healthcare provision. GP27 Holyhead and Environs does not make specific reference to healthcare facilities and this could be included as an additional reference to the considerations which the project promoter should provide.	
	10. Transport	An increase in road transport will lead to congestion which could indirectly affect doctors and ambulance services.	Comment noted. The draft Wylfa NNB SPG seeks to prioritise rail and water over road transport. It also seeks to locate new development (other than the main site) in locations accessible by sustainable transport means and close to existing services and facilities. GP27 requires the project promoter to put measures in place to minimise the volume of road traffic movements between Holyhead and the main NNB site.	No change.
	11. Utilities	There will be additional pressure on existing services and facilities including the healthcare services.	See response to Construction Workers Accommodation (8) above.	No change.
	12. Waste	It is not possible to positively answer this question until an Environmental Impact Assessment has been undertaken to confirm that the surrounding population will not be affected by the proposal.	Comment noted. The project promoter will be legally required to undertake EIA as part of the DCO application. In addition, the County Council requires (at GP7) for the project promoter to work with the Council and Local Health Board to identify any	Reference to potential radiological effects and the need to assess them to be included in GP17.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
			significant health impacts and mitigation measures.	
	13. Climate Change	More information is required before there can be assurance that there will be no environmental effects.	Comment noted. The County Council fully expects that the project promoter will provide further information in respect of the effects of the NNB on climate change in due course and as part of the EIA. GP18 of the draft Wylfa NNB SPG also requires that the project promoter prepare a Carbon Management Plan.	No change.
	14. Natural Environment	Green resources and natural areas need to be preserved as these encourage and promote outdoor activity which can have health benefits.	Agreed. The draft Wylfa NNB SPG recognises the important role that green spaces and amenity areas can play in supporting healthy lifestyles and at GP 8 sets out that the County Council will resist the loss of open space.	No change.
	15. Historic Environment	Influx of construction workers could have a detrimental effect on the historic environment, a reduction in the historical areas which the population can visit could have negative effects upon levels of activity and therefore health.	Comment noted. The County Council recognises the potential for the NNB project to have an adverse impact on the Island's historic environment. In response, guidance contained in the draft Wylfa NNB SPG seeks to ensure that the Island's historic environment is conserved and enhanced (see GP22).	No change.
	16. Facilitating Development	The topic of healthcare has not been properly addressed, there will be a significant effect upon Holyhead. There will be more demand for healthcare facilities upon an already stretched service.	Disagree. Guidance in respect of healthcare provision is included at GP6 and GP23 (in the wider context of community facilities and services). Notwithstanding, as noted above it is agreed that specific reference to provision in Holyhead could be included in the supporting text to GP27.	Include reference within the supporting text to GP27 to the importance of adequate healthcare provision in Holyhead.
A051	General	Agreement with same questions as A050. Also same comments made against questions 8, 10-	As per answers to A050.	As per changes in respect of

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
		16.		A050.
A052: Lifelong Learning	Welsh Language	Reference to Welsh language is weak. Protection of Welsh, Welshness and culture is important. There is also a requirement to provide provision for children who are latecomers to the County and a need to increase the number of language centres if this is to be achieved.	Disagree. The draft Wylfa NNB SPG considers specifically the Welsh language and culture at Section 4.5. GP13 requires the project promoter to undertake impact assessments of the NNB project upon the Welsh language. Mitigation measures listed are indicative only and are not intended to be exhaustive. A wider range of measures are likely to be required, taking into account the level and type of potential effects identified through detailed assessment once details of the scale and location of development, and of the number of construction/operational workers, are known. However, it is considered that the indicative mitigation measures included in GP13 could include the provision of new, or contributions to existing, language centres.	Include in GP13 reference to Welsh language centres.
	Children/pupil numbers	Does not receive enough attention. Reference is made to the document stating that 3 or 4 additional pupils arriving. This may force a need for additional classes in foundation year or at secondary level.	Disagree. Education provision is considered under Section 4.3 of the draft Wylfa NNB SPG in the wider context of community facilities and services. The draft SPG requires the project promoter to ensure that appropriate facilities are in place to respond to the indirect effects arising from the NNB project and that should improved or additional facilities be required, that these are financed by the project promoter, providing where possible a legacy benefit. Until further information is provided by the project promoter with regard to the number of construction workers now considered necessary to support the construction of the NNB, the	No change.

Responder	Consultation Question/SPG ref.	Comment	Response	Recommendation / Proposed Modification
Funding	There is a need to be clear on what is required and how the additional costs will be met.	<p>type of accommodation sought and its location, it is difficult for the County Council to list what it considers the specific effects will be, and the specific interventions that it will require to address them.</p>	<p>Comment noted. As noted above, until further information is provided by the project promoter with regard to the number of construction workers now considered necessary to support the construction of the NNB, the type of accommodation sought and its location, it is difficult for the County Council to list what it considers the specific effects will be, and the specific interventions that it will require to address them.</p> <p>Notwithstanding, the draft Wylfa NNB SPG is clear at GP23 that the costs of providing additional facilities, where these are required as a direct result of the NNB project, should be borne by the project promoter.</p>	No change.

Table 2 contains comments received during the public exhibitions, the County Council's response to each issue raised and an indication as to whether it is proposed to amend the draft Wylfa NNB SPG and how the document is to be revised.

Table 2 Record of Public Exhibitions

Comment	Response	Recommendation / Proposed Modification
No worries looking forward to all the economic spin offs.	Comment noted. The draft Wylfa NNB SPG seeks to maximise economic opportunities arising from the NNB project for the Island and North Wales region.	No change.
Employment opportunities positive.	Comment noted. The draft Wylfa NNB SPG seeks to ensure that the local workforce is able to take advantage of the opportunities that may be generated through the NNB project (see in particular GP2).	No change.
Need visual concepts of how it is going to look on the landscape how it would fit in to what we already have?	Comment noted. At this stage the scale/design of the NNB is unknown. The provision of visual concepts will be a matter for the project promoter. Notwithstanding, the draft Wylfa NNB SPG seeks to conserve and enhance the Island's landscape (see GP20).	No change.
Infrastructure positive but how will we cope with all the extra people?	Comment noted. The draft Wylfa NNB SPG identifies the potential for impacts on existing infrastructure as a result of the NNB project. Specific guidance is included in the draft SPG which seeks to ensure that there would be no adverse impact on infrastructure as a result of new development and that, where possible, opportunities are sought to enhance existing	No change.

Comment	Response	Recommendation / Proposed Modification
	provision.	
Concerns over safety and technology following previous issues at Fukushima and other plants.	Comment noted. The draft Wylfa NNB SPG provides locally-specific guidance on existing national and local planning policy. NPS EN-6 (at para 3.2.10) sets out that the Planning Inspectorate should act on the basis that the regulatory regime will be properly applied and enforced to protect human health. The SPG cannot be a vehicle for new policy and is therefore unable to consider health impacts associated with operation of the NNB.	No change.
No problem with the safety for the new development.	Comment noted.	No change.
Transport from towns to site needs to be looked at – everybody doesn't have a car – first time around Wylfa Wessex transport were used for workers.	Comment noted. The draft Wylfa NNB SPG includes specific guidance related to transport (see GP14) which seeks to ensure that workers are able to access the site via sustainable modes of transport.	No change.
Housing for key people in workforce new housing.	Comment noted. Section 4.4 of the draft Wylfa NNB SPG sets out the County Council's guidance in respect of construction worker accommodation. This guidance seeks to ensure that the influx of workers does not have an adverse impact on the local housing market and that, where possible, opportunities are sought to deliver lasting benefits to the Island's communities.	No change.
Good for local business as did the old Wylfa.	Comment noted. The draft Wylfa NNB SPG includes guidance designed to support the ability of	No change.

Comment	Response	Recommendation / Proposed Modification
	local businesses to benefit from the NNB (see, for example, GP4) and encourage the project promoter to deliver local supply chain opportunities (see GP1).	
Will create 1000 well paid jobs with spend in Local communities.	Comment noted. The draft Wylfa NNB SPG seeks to ensure that the local workforce is able to take advantage of the opportunities that may be generated through the NNB project (see in particular GP2).	No change.
Need jobs opportunities for local people.	Comment noted. The draft Wylfa NNB SPG seeks to ensure that the local workforce is able to take advantage of the opportunities that may be generated through the NNB project (see in particular GP2).	No change.
Quicker the better: re opening of the plant.	Comment noted.	No change.
Too many young people leaving the Island – no jobs at the moment Wylfa could change this.	Comment noted. The draft Wylfa NNB SPG seeks to ensure that the local workforce, including young people, is able to take advantage of the opportunities that may be generated through the NNB project (see in particular GP2).	No change.
@Wylfa site –Why CADW recognised this ? Could this be revamped rather than protected.	Unclear what this response is referring to exactly. However, the guidance contained in the draft Wylfa NNB SPG (see GP22) seeks to conserve and enhance cultural heritage assets and their settings.	No change.
Don't want work to be undertaken on / via National Trust headland.	Comment noted. This is a matter for consideration by the project promoter (although the principle of development at the proposed main NNB site has	No change.

Comment	Response	Recommendation / Proposed Modification
	already been established in national (UK) planning policy)). Notwithstanding, GP20 of the draft Wylfa NNB SPG seeks to conserve and enhance the Island's natural environment including coastline.	
What situation is re: getting stuff to area via sea – MOLF + Breakwater + sination needs to be understood further.	Comment noted. The proposed approach to the movement of materials to the main site is unknown at this stage. However, GP14 of the draft Wylfa NNB SPG sets out the County Council's expectations in respect of transport and broadly seeks to prioritise the use of rail and waterbourne transport modes. The County Council expects the project promoter to prepare a Transport Plan setting out in detail their proposed approach to the movement of materials to/from site.	No change.
Don't want Chlorine to be used in overflow water – impact on local env.	Comment noted. This is a specific matter related to the design/operation of the NNB and is therefore outside the scope of the Wylfa NNB SPG. Notwithstanding, the draft SPG seeks to conserve and enhance the natural environment including in respect of the water environment (see, for example, GP21).	No change.
Topic paper on Natural Environment very useful.	Comment noted.	No change.
Please can we have a simple / concise supporting info to make views better informed?	Comment noted. The County Council is of the opinion that the consultation on the draft Wylfa NNB SPG fulfilled the necessary statutory requirements, was comprehensive and appropriate.	No change.
Maximise all available bed space in private	Comment noted. In order to ensure that the influx of construction workers does not have an adverse	No change.

Comment	Response	Recommendation / Proposed Modification
accommodation across the Island.	impact on the local housing market, the County Council has adopted the Wylfa NNB Construction Workers Accommodation Position Statement. In accordance with this Position Statement, GP10 of the draft Wylfa NNB SPG calls for accommodation to be provided to consist of one third purpose built, one third private rented and on third within tourist accommodation.	
Local people need skills training and security clearance for jobs at nuclear site.	Comment noted. The draft Wylfa NNB SPG seeks to ensure that the local workforce is able to take advantage of the opportunities that may be generated through the NNB project. In this context, GP2 covers specifically local job creation and skills development.	No change.
Make skill cards flexible: ECITB & support for cost of accreditation L+ accessible	Comment noted. The use of skill cards is considered to be outside the scope of the Wylfa NNB SPG.	No change.
Important to make sure local people get new jobs – this would be good thing for Anglesey	Comment noted. The draft Wylfa NNB SPG seeks to ensure that the local workforce is able to take advantage of the opportunities that may be generated through the NNB project (see in particular GP2).	No change.
Excellent project / development that will have a huge impact on financial recovery across Anglesey & North Wales.	Comment noted. The draft Wylfa NNB SPG seeks to maximise economic opportunities arising from the NNB project for the Island and North Wales region.	No change.
Nuclear power is as safe as safe can be determined and Wylfa showed first class safety records.	Comment noted.	No change.

Comment	Response	Recommendation / Proposed Modification
<p>Opportunities / employment must be offered and training given now to ensure skills base to meet the need be it in the building construction field or after within Wylfa Newydd.</p>	<p>Comment noted. The draft Wylfa NNB SPG seeks to ensure that the local workforce is able to take advantage of the opportunities that may be generated through the NNB project. In this context, GP2 covers specifically local job creation and skills development.</p> <p>However, GP2 should explicitly require early dialogue between the project promoter and training providers.</p>	<p>Amend supporting text to GP2 to refer to the need for the timely implementation of training measures.</p>
<p>They must make sure there are jobs for local disabled people too.</p>	<p>Agreed.</p>	<p>Supporting text to GP2 to be amended to include reference to the need to ensure that disadvantaged groups are able to take advantage of employment opportunities generated by the NNB project.</p>
<p>No problem with the safety for the new development</p>	<p>Comment noted.</p>	<p>No change.</p>

Abbreviations

AONB	Area of Outstanding Natural Beauty
County Council	The Isle of Anglesey County Council
DCO	Development Consent Order
EIA	Environmental Impact Assessment
EIP	Energy Island Programme
GP	Guiding Principle
HRA	Habitats Regulations Assessment
IROPI	Imperative Reasons of Overriding Public Interest
JLDP	Joint Local Development Plan
LDO	Local Development Order
NPS	National Policy Statement
NRW	Natural Resources Wales
ONR	Office for Nuclear Regulation
PAC	Pre-Application Consultation

PPW	Planning Policy Wales
SOCG	Statement of Common Ground
SSSI	Site of Special Scientific Interest
STEM	Science, Technology, Engineering and Mathematics
UDP	Unitary Development Plan
Wylfa NNB SPG	New Nuclear Build at Wylfa: Supplementary Planning Guidance



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