AVISON YOUNG

Green Infrastructure Statement

DEMOLITION OF THE ABOVE GROUND PONDS COMPLEX STRUCTURES; THE PERMANENT RETENTION OF BELOW-GROUND RADIOACTIVELY CONTAMINATED STRUCTURES AND OF DEMOLITION ARISINGS (INCLUDING RADIOACTIVELY CONTAMINATED DEMOLITION WASTE) EMPLACED IN BELOW GROUND VOIDS; AND RELATED CAPPING AND DRAINAGE WORKS

Trawsfynydd Nuclear Power Station, Blaenau Ffestiniog, LL41 4DT

AY Reference: AY/17C1000085/GIS/01

NRS (Client) Reference: TRAWS-L28305-DOC-0142

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For and on behalf of Avison Young (UK) Limited

1. Introduction

This Green Infrastructure Statement has been prepared to accompany and support a full planning application for the demolition of the Trawsfynydd Nuclear Licensed Site (NLS) ponds complex to ground slab level, infilling of its below-ground voids, capping of its footprint, and modifications to the surface water drainage.

The applicant is Nuclear Restoration Services (NRS) Ltd, who is the Site Licence Company and operates the Trawsfynydd site on behalf of the Nuclear Decommissioning Authority (NDA), in order to carry out the decommissioning and remediation process.

1.1 Legislative Requirement & Purpose of this Statement

Planning Policy Wales (PPW) (Edition 12, February 2024) requires that all planning applications are accompanied by a Green Infrastructure Statement that is proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal.

The purpose of this statement is to provide an overview of the existing habitats on the site and their condition; potential development impacts (in absence of mitigation) and proposed biodiversity enhancements.

1.2 Structure of this Statement

This statement seeks to demonstrate the acceptability of the proposals in the context of relevant policy, taking into account the nature of the site. The remainder of the statement is, therefore, structured as follows:

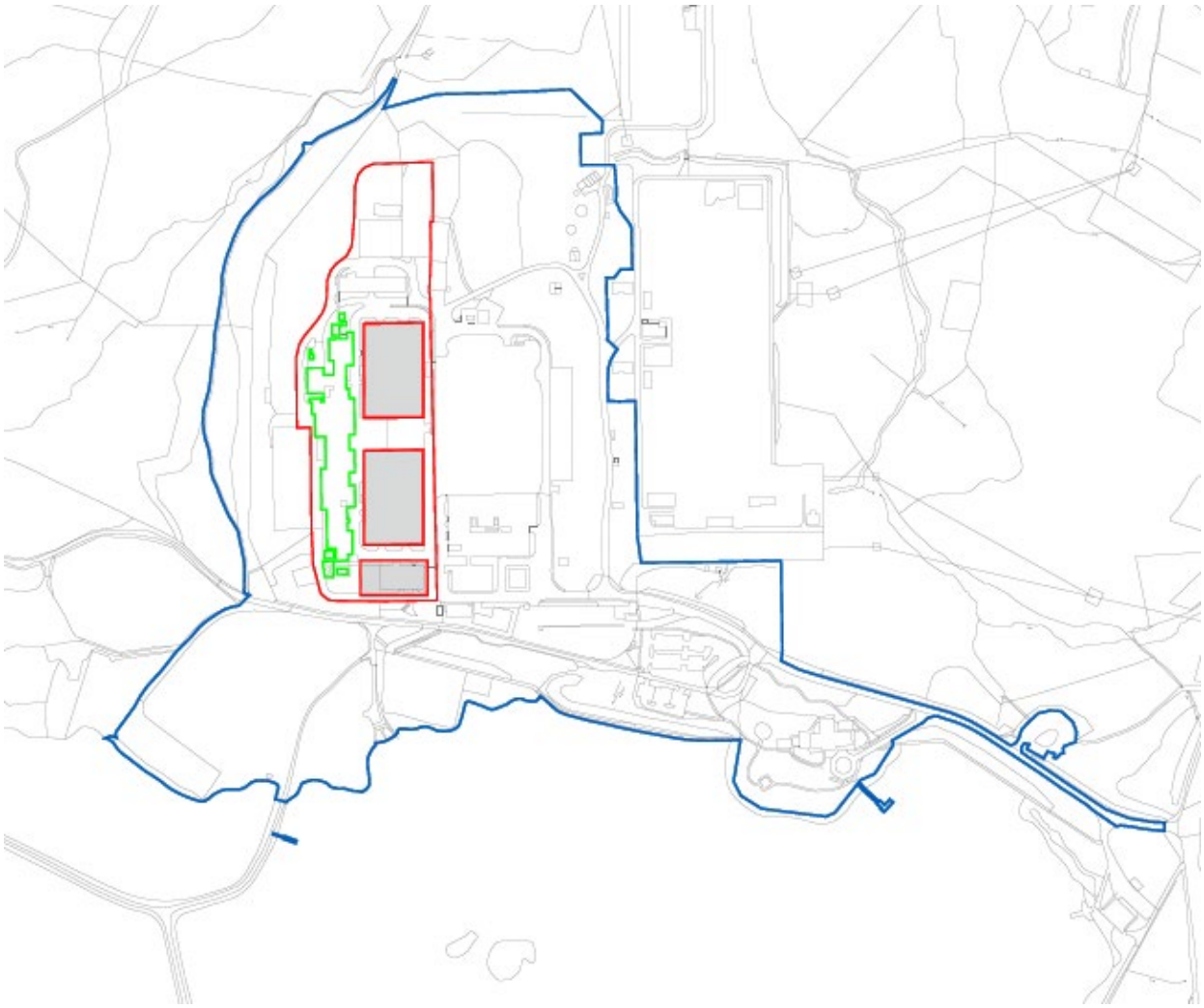
- Section 2 provides an explanation of the context of the application including site details and a description of the proposals;
- Section 3 sets out the policy context relevant to the proposals;
- Section 4 justifies the extent of green infrastructure proposed; and
- Section 5 provides an overview and concludes this statement.

2. The Site & Proposals

2.1 Site Context

Trawsfynydd started generating electricity in 1965 and ceased generation in 1991; being permanently shut down in 1993. The site is currently undergoing decommissioning and waste management operations. Decommissioning involves the systematic removal and management of plant, buildings and waste previously associated with electricity generation and subsequent operations.

The Application Site mainly relates to the ponds complex, which comprises a complex of mainly contiguous buildings (some of which extend below-ground) located on the south-west side of the two reactor buildings. However, due to the proposed disposals including some redundant features outside of the ponds complex footprint, the Application Site encompasses a slightly broader "Disposal Area". The extent and location of the site is shown on the site location plan below.



2.2 The Proposals

The proposals involve the demolition of the ponds complex to ground slab level, infilling of its below-ground voids, capping of most of its footprint, and modifications to the surface water drainage. The proposals also include the on-site disposal of some structures of the ponds complex that are contaminated with residual radioactivity, including using suitable radioactively contaminated arisings (concrete and masonry) from demolition of the above ground structures to infill unwanted voids (known as "disposal for a purpose"). Some voids will be partially infilled with clean concrete for

structural reasons, and others may be partially infilled with clean concrete for groundwater impact mitigation reasons. Some additional near-by, but relatively minor, radioactively contaminated below-ground infrastructure will also become in-situ disposals, although these do not require any significant engineering operations.

2.3 Ecological Baseline

The Application Site is not subject to any statutory or local ecological designation and is generally devoid of landscape features. Nevertheless, a Desk Study (Ecology), Phase 1 Habitat Survey and Preliminary Bat Roost Assessment were undertaken to establish any habitats and features with potential to support protected and/or notable conservation priority species. Subsequently, secondary survey work has been undertaken in the form of a woodland survey, further bat surveys and aquatic surveys.

The habitat within the Application Site boundary, which comprises buildings and mostly hardstanding, are considered unlikely to support the following species: red squirrel, terrestrial invertebrate species, pine marten, dormouse, water vole, otter, great crested newt or reptiles. In terms of badger, in 2021 a survey found no evidence of this species within the wider Trawsfynydd site boundary.

There are 11 different habitats of principal importance for the purpose of maintaining and enhancing biodiversity in relation to Wales either within the Phase 1 study area or within 3km. Additionally, there are 109 Ancient Woodland Inventory (AWI) sites within 3km of the NLS, including Ancient Semi-Natural Woodland Sites, Restored Ancient Woodland Sites, Plantation on Ancient Woodland Sites and Ancient Woodland Site of Unknown Category. Two of these are within the wider Trawsfynydd site: the plantation on an Ancient Woodland Site to the north-west; and an Ancient Semi Natural Woodland to the east of the access track, near to the A470. A further Ancient Semi-Natural Woodland site is located within 31m of the wider Trawsfynydd site – east of the A470. In addition, fifteen habitat types were defined within the Phase 1 habitat survey area.

Broadleaved woodland is the only potential Environment (Wales) Act 2016 Section 7 habitat present within the wider Trawsfynydd site, although no broadleaved woodland is present within the Application Site itself, which comprises buildings and mostly hardstanding. An area of broad-leaved woodland has been identified within 50m of the boundary of the Application Site, which without mitigation could be impacted by dust arising during the works. However, mitigation is proposed as part of the Construction and Demolition Environmental Management Plan and includes potential measures such as the use of water sprays, regular cleaning of mud/dust deposits from on-site roads, including the use of re-circulating water wheel washers as appropriate, and sheeting of vehicles carrying potentially dusty loads.

In respect of bats, the site is situated between constituent parts of Meirionydd Oakwoods and Bat Sites Special Area of Conservation (SAC) and is located approximately 0.9km from the nearest component of the SAC, which is primarily designated for lesser horseshoe bats. The buildings on wider Trawsfynydd site were subject to preliminary roost assessments in 2019, re-checked in 2021, and then emergence surveys were undertaken based on the 2021 roost suitability. No bat roosts were identified in any of the buildings on site. However, there is a soprano pipistrelle maternity roost in the pump house, which is approximately 200m from the Application Site boundary, but that roost will not be affected by the Proposed Development.

3. Policy Context

Future Wales (The National Plan)

Future Wales – The National Plan 2040 (February 2021) sets the direction for development across Wales to 2040. It constitutes a national development plan with a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, and improving the health and well-being of communities. Decarbonisation, health, prosperity and the Welsh language are common threads underpinning all Future Wales policies.

Policy 9 (Resilient Ecological Networks and Green Infrastructure) seeks to ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure as part of development proposals. The policy states *"…the Welsh Government will work with key partners to:*

- *identify areas which should be safeguarded and created as ecological networks for their importance for adaptation to climate change, for habitat protection, restoration or creation, to protect species, or which provide key ecosystems services, to ensure they are not unduly compromised by future development; and*
- *identify opportunities where existing and potential green infrastructure could be maximised as part of placemaking, requiring the use of nature-based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and well-being.*

Planning authorities should include these areas and/or opportunities in their development plan strategies and policies in order to promote and safeguard the functions and opportunities they provide. In all cases, action towards securing the maintenance and enhancement of biodiversity (to provide a net benefit), the resilience of ecosystems and green infrastructure assets must be demonstrated as part of development proposals through innovative, nature-based approaches to site planning and the design of the built environment."

Planning Policy Wales (PPW)

The Welsh Government issued an update to Chapter 6 of PPW on 11 October 2023 covering green infrastructure, net benefit for biodiversity, the protection afforded to Sites of Special Scientific Interest and trees and woodlands. These changes were published in an annex to Chapter 6 and have been included in a consolidated version of PPW (Edition 12).

Planning Policy Wales 12 sets out a range of policies to maintain and enhance biodiversity, promote the resilience of ecosystems, including the stepwise approach, and to maximise the provision of green infrastructure.

Paragraph 6.2.12 of PPW states that a Green Infrastructure Statement is an effective way of demonstrating positive multi-functional outcomes which are appropriate to the site in question and must be used for demonstrating how the step-wise approach (Paragraph 6.4.15 of PPW) has been applied.

Step 1 (Avoid) – The primary focus of planning authorities is to prevent harm to biodiversity and ecosystem functioning by considering a wide range of species and habitats. They must ensure that any potential environmental damage is minimised by thoroughly evaluating alternative sites and design options that would cause less harm or provide benefits.

Step 2 (Minimise) – When all possible options for avoiding harm to biodiversity have been explored, applicants must collaborate with planning authorities to minimise the initial impact on biodiversity and ecosystems.

Step 3 (Mitigate) – When efforts to minimise the impact on biodiversity and ecosystems have been exhausted and there's still potential for damage or loss, the proposed development must include mitigation measures. These measures should limit the negative effects of the

development by repairing damaged habitats and species disturbances, aiming to restore beyond a like-for-like level considering disturbance and recovery time. The goal is to enhance ecosystem resilience both on the site and, where feasible, in the surrounding area.

Step 4 (Compensation) – When all the steps above have been exhausted, and where modifications, alternative sites, conditions or obligations are not sufficient to secure biodiversity outcomes further on-site/immediately proximate, as a last resort off-site compensation for unavoidable damage must be provided.

The Well-being of Future Generations Act (2015)

The Well-being of Future Generations Act (2015) aims to promote the well-being of both current and future generations. It represents a shift towards a more sustainable and long-term approach to governance, focusing on economic, social, environmental, and cultural well-being.

The Act requires public bodies in Wales to consider the impact of their decisions on these well-being goals and to work towards achieving them. It establishes a set of well-being objectives, such as a prosperous Wales, a resilient Wales, a healthier Wales, a more equal Wales, a Wales of cohesive communities, and a Wales of vibrant culture and thriving Welsh language.

The Act encourages collaboration between public bodies, communities, and stakeholders to ensure effective green infrastructure provision. This collaborative approach fosters innovation, knowledge sharing, and community engagement in designing and implementing green projects that benefit both current and future generations.

4. Green Infrastructure Strategy

Given the unordinary nature of the proposals and that the site is highly regulated decommissioning power station that is security controlled, the opportunity to provide enhancement of existing green space is limited. Nevertheless, the Applicant acknowledges that Section 6 of the Environment (Wales) Act 2016 sets out that planning authorities must seek to maintain and enhance biodiversity in the exercise of their functions and, in so doing, promote the resilience of ecosystems, so far as consistent with the proper exercise of those functions. This means that development should not cause any significant loss of habitats or populations of species, locally or nationally and ideally should provide a net benefit for biodiversity.

It is therefore proposed that enhancements are made to increase the roosting and nesting provision for birds and bats within an off-site enhancement area. The application is supported by a Biodiversity Enhancement Strategy, prepared by Middlemarch Environmental Ltd, that outlines habitat retention, creation and management practices that will be undertaken to improve the value of the off-site enhancement area to biodiversity.

The Biodiversity Enhancement Strategy concludes the buildings and hardstanding within the application site are of negligible ecological value and net benefit for biodiversity is best delivered off-site. An area of land for enhancement purposes has been identified 0.58km from the application site on land owned by the NDA and, therefore, in control of the Applicant. The proposed enhancement measures comprise:

- The installation of 6 no. bird boxes of varying type.
- The installation of 6 no. large multi-chamber bat boxes.
- An annual check of all bird and bat boxes for any damage or defects.

Proposals involving construction work with a gross floorspace exceeding 100 sqm require consideration of the need for Sustainable Drainage Systems (SuDS) to manage on-site surface water. Given the existing impermeable nature of the ponds complex buildings and hardstanding and that the Proposed Development comprises their replacement with an impermeable capping slab, no change in the quantity of runoff is expected. As is the case currently, runoff from the capping slab will be routed into the existing site wide piped drainage system.

A Drainage Strategy for the completed concrete cap over the former ponds complex has been prepared and submitted as part of a drainage application to the Sustainable drainage Approval Body (SAB) (SAB Reference 0223/22/SUDS). This application was approved on 09 June 2022. The incorporation of SuDS features is not feasible, and this has been accepted by the SAB. Instead, it is proposed to slightly modify the existing drainage arrangements. These will be functionally the same as the existing drainage (or better) and will have the same rainfall capture area and, in this way, will not increase the risk of flooding to the site or surrounding area. Captured rainwater will, as now, be pumped to Llyn Trawsfynydd.

5. Summary

This Green Infrastructure Statement has been prepared to accompany and support a full planning application for the demolition of the Trawsfynydd Nuclear Licensed Site (NLS) ponds complex to ground slab level, infilling of its below-ground voids, capping of its footprint, and modifications to the surface water drainage.

The proposals include opportunities for green infrastructure measures that are appropriate to the site in question, proportionate to the development proposed and have been identified in accordance with Planning Policy Wales's step wise approach (outlined at Paragraph 6.4.15 of Planning Policy Wales).

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