

# Planning Statement

**DEMOLITION OF THE ABOVE GROUND PONDS COMPLEX STRUCTURES; THE PERMANENT RETENTION OF BELOW-GROUND RADIOACTIVELY CONTAMINATED STRUCTURES AND OF DEMOLITION ARISING (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/PS/01

NRS Reference: TRAWS-23-045

# Contents

1. Introduction.....	4
The Purpose of this Statement.....	4
Structure of this Statement.....	5
2. The Site: Location & Extent .....	6
Location & Existing Use .....	6
Planning History .....	6
3. The Proposals.....	8
The Rationale for the Proposals .....	11
4. Consultation & Community Engagement.....	12
Preface .....	12
EIA Screening Opinion .....	12
EIA Scoping Opinion .....	12
5. Planning Policy Context .....	13
Preface .....	13
Planning Constraints.....	13
National Planning Policy.....	14
Local Planning Policy.....	18
Supplementary Planning Guidance (SPG) .....	29
6. Planning Issues .....	30
The Principle of Development .....	30
Residential Amenity (Noise & Vibration, Air Quality and Dust).....	31
Visual Amenity, Landscape & Heritage.....	32
Traffic & Transportation .....	34
Flood Risk & Drainage.....	34
Ecology .....	35
Groundwater and Surface Water & Land Contamination (Works Phase) .....	36
Long-Term Impacts .....	37
Impact upon the Welsh Language .....	38
Socio-Economic & Cultural .....	39
Environmental Permit Application Considerations .....	40
7. Summary .....	42

## Appendices

Appendix I	Site Location Plan
Appendix II	Site Layout Plan
Appendix III	EIA Screening Opinion (dated 13 May 2022)
Appendix IV	EIA Scoping Opinion (dated 23 March 2023)
Appendix V	Viewpoints analysis
Appendix VI	Guidance on the requirements for release from radioactive substances regulation (GRR)
Appendix VII	Waste Planning Assessment

## Figures

Figure 1	Site Location Plan
Figure 2	CGI of Trawsfynydd NLS with the ponds complex highlighted in yellow
Figure 3	CGI of Trawsfynydd NLS following completion of the proposed development
Figure 4	Graphic of the proposed on-site disposal area
Figure 5	Extent of proposed concrete cap
Figure 6	Extract from Eryri Local Development Plan Proposals Map
Figure 7	GRR Principles and Requirements

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**For and on behalf of Avison Young (UK) Limited**

# 1. Introduction

## The Purpose of this Statement

- 1.1 This Planning Statement has been prepared to accompany and support a full planning application for:
  - i the demolition of the Trawsfynydd ponds complex buildings;
  - ii the infill of below-ground voids of the ponds complex, mainly with radioactively contaminated demolition arisings, and the permanent retention of the infill (which, in environmental permitting terms, is the disposal of radioactive waste);
  - iii the permanent retention of the radioactively contaminated residual below-ground structures of and around the ponds complex (which, in environmental permitting terms, also involves the disposal of radioactive waste);
  - iv the capping of the footprint of the former ponds complex with a concrete cap; and
  - v modifications to the local drainage on and around the concrete cap.
- 1.2 The permanent retention aspects of ii and iii above are referred to later in this document as “on site disposal”. Retaining structures (iii) is sometimes referred to as “in situ disposal”, whereas infilling voids (ii) is sometimes referred to as “disposal for a purpose”.
- 1.3 The associated permit variation application required under Environmental Permitting (England and Wales) Regulations 2016 was submitted to Natural Resources Wales (NRW) in December 2023.
- 1.4 The applicant is Nuclear Restoration Services (NRS) Limited<sup>1</sup>. On 02 April 2024, Magnox Limited was rebranded to NRS. Hereafter the company is referred to as ‘the Applicant’.
- 1.5 The Trawsfynydd Nuclear Licensed Site (NLS) is operated by the Applicant on behalf of the Nuclear Decommissioning Authority (NDA), and is responsible for the general management of, and all operations at, a fleet of reactor and other nuclear sites including Trawsfynydd. The Applicant carries out the decommissioning and waste management processes at the site. Decommissioning involves the systematic removal and management of plant, buildings and waste previously associated with electricity generation and subsequent operations.
- 1.6 The extent and location of the site is shown on the site location plan below, where the blue line shows the area under the Applicant’s control, the redline shows the Application Site boundary, the green line shows the ponds complex buildings to be demolished, and the pink line shows the site compound vehicle access and exit route. Note that the Application Site excludes the two reactor buildings and the reactor area Access Control Block that are shaded grey in the below plan.

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<sup>1</sup> NRS Limited, the Site Licence Company (SLC) for the Trawsfynydd Site, is a wholly owned subsidiary of the Nuclear Decommissioning Authority (NDA).

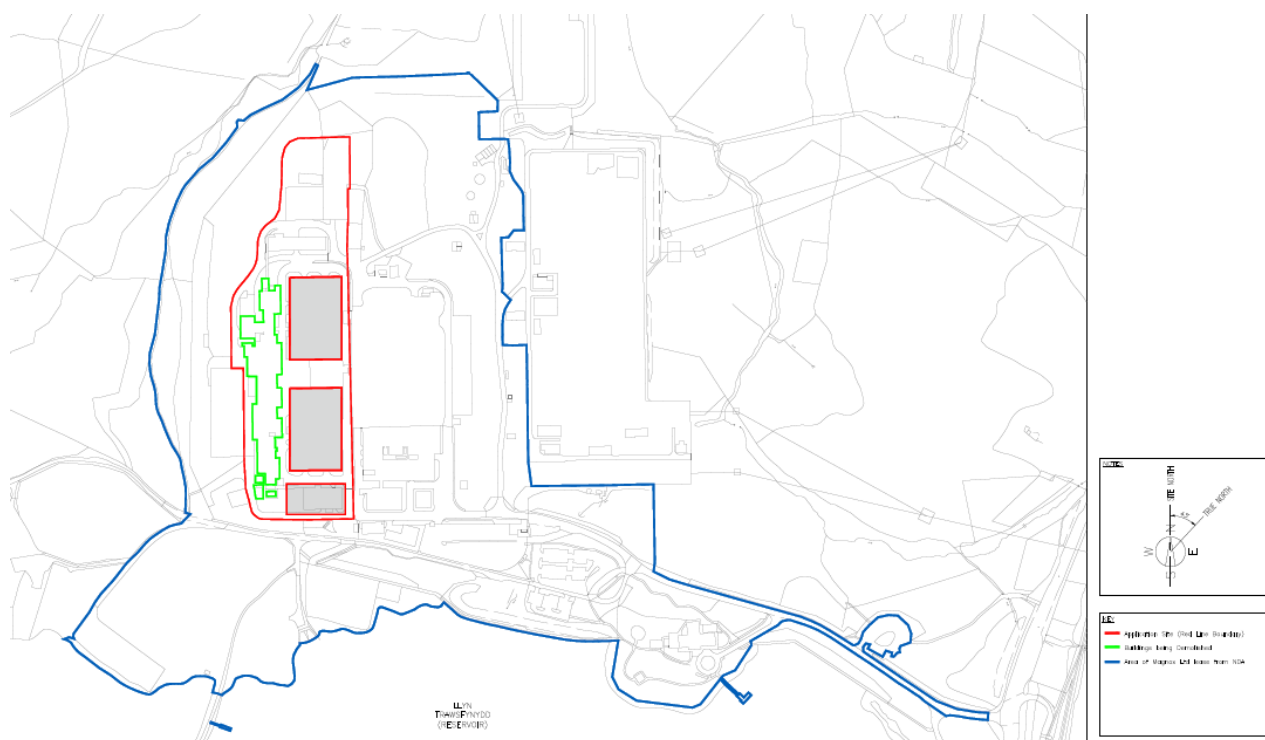


Figure 1: Site Location Plan (taken from drawing TRA-3210-LA-47775 Issue 01 submitted with the planning application).

## Structure of this Statement

- 1.7 This statement seeks to demonstrate the acceptability of the proposed development in the context of relevant planning policy, taking into account the context of the site and the surrounding forms of development. 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 relevant planning history;
  - Section 3 provides a description of the proposals and sets out the background and rationale for them;
  - Section 4 sets out the details of pre-application dialogue with the Authority and recent public engagement;
  - Section 5 provides a review of the planning policy context relevant to the proposals;
  - Section 6 considers the planning issues, providing a comprehensive analysis of how the proposals conform with relevant policy and planning considerations; and
  - Section 7 provides an overview and concludes this document.

## 2. The Site: Location & Extent

### Location & Existing Use

- 2.1 The Trawsfynydd nuclear power station site is located in the Eryri National Park in Gwynedd, on the northern side of Llyn Trawsfynydd. The power station ceased electricity generation in 1991 and was permanently shut down in 1993 and is currently undergoing decommissioning and waste management operations<sup>2</sup>.
- 2.2 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 west side<sup>3</sup> of the two reactor buildings. However, due to the proposed disposals including some below-ground redundant features outside of the ponds complex footprint, the Application Site encompasses a slightly broader "Disposal Area".
- 2.3 The site location plan, attached at Appendix I, clearly defines the site and its context.

### Planning History

- 2.4 Based upon a search and review of the Authority's online planning records, there are a number of historic planning permissions of relevance to the site. The most significant planning permissions are listed in the table below.

LPA Reference	Registered	Development	Decision
-	-	Original planning permission for power station	Granted following public inquiry in 1958
NP5/73/113G	07 January 1994	Extension to existing visitor centre to provide cafe facilities.	Granted (03 March 1997)
NP5/73/LU16 W	07 January 1997	Proposals comprising the decommissioning of Trawsfynydd Power Station more particularly described in Schedules 1 and 2 to the application and covering letter dated 20th December 1996.	Refused (08 May 1997)
NP5/73/LU16 X	28 May 1998	Application for Certificate of Lawfulness for proposed development - Replacement of sludge solidification plant with modern plant, alteration of ponds complex to house modern plant, two temporary structures to protect waste conditioning plant.	Granted (03 September 1998)
NP5/73/16Z	23 November 1999	Replacement helicopter landing pad.	Granted (20 January 2000)
NP5/73/113H	09 March 2000	Erection of open shelter and gravel platform as a viewing point.	Granted (27 April 2000)
NP5/73/16Y	13 August 1998	Alterations to ponds complex and reactor buildings for the continued storage of radioactive material created on site.	Withdrawn (06 July 2001)
NP5/73/287	20 July 2001	New building for storage of intermediate level waste and reduction of height of former reactor buildings with new roofs and recladding.	Called in by National Assembly 27 July 2001

<sup>2</sup> However, there are live high voltage electrical switching compounds operated by Scottish Power and National Grid adjacent to the site.

<sup>3</sup> This is based on 'site north' rather than 'true north'.

LPA Reference	Registered	Development	Decision
APP/H9504/X/02/514892	Called-in on 27 July 2001	New building for storage of intermediate level waste and reduction of height of former reactor buildings with new roofs and recladding.	Recommended for approval by PINS 19 March 2003 and approved by NAW 31 July 2003
NP5/73/287	08 April 2004	Proposed ILW store and reduction in height and cladding of the former reactor buildings	Partly approved / partly refused (07 September 2004)
	On review of the correspondence between the site and SNPA, following the grant of planning permission on 31 July 2003, this application appears to refer to matters dealt with under the various conditions attached to the planning permission. In a letter dated 07 September 2004, certain materials were approved, but roofing materials were refused. However, this matter was subsequently dealt with and the approved roofing materials are RAL 7015 slate grey finish metal cladding.		
NP5/73/287B	17 March 2011	Formation of new temporary car park	Granted (19 April 2011)
NP5/73/287C	22 June 2012	Variation of condition no. 3 of planning permission NP5/73/287B (dated 10/04/2011) to extend time period of use of land as car park to 31/12/2016	Granted (24 July 2012)
APP/H9504/X/02/514892 (NP5/73/287)	27 January 2021	Informal request to temporarily suspend noise monitoring controlled by condition 08 (Parts A-F) of planning permission APP/H9504/X/02/514892 (NP5/73/287) whilst there is a halt to the reduction in the height and remodelling of the reactor buildings.	Agreed (28 January 2021)
NP5/73/LU28 7K	16 May 2022	Certificate of Lawfulness (Proposed Use) to reduce height of two reactor buildings	Granted (26 September 2022)
NP5/73/287J	18 January 2022	Proposed demolition and disposal of the Trawsfynydd Ponds Complex, disposal of other minor structures, related capping and drainage works, and installation of groundwater monitoring boreholes	EIA required (13 May 2022)
NP5/73/287M	15 September 2022	Formal request for a scoping opinion in connection with the proposals to demolish the Trawsfynydd Ponds Complex, dispose of other minor structures, related capping and drainage works, and installation of groundwater monitoring boreholes	SO Issued (23 March 2023)
NP5/73/LU28 7N	5 January 2023	Application for a Certificate of Lawfulness of Existing Use or Development – Demolition of the Administration Complex	Issued (27 April 2023)
NP5/73/287P	06 February 2023	Part retention / part completion of replacement sewage treatment plant, together with associated works	Granted (19 January 2024)
NP5/73/287Q	14 June 2023	Drilling of 17no. boreholes for investigating and monitoring of groundwater	Granted (31 July 2023)

### 3. The Proposals

- 3.1 The proposals (illustrated in Figures 2 and 3) 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 “in-situ disposal” of some structures of the ponds complex that are contaminated with residual radioactivity and “disposal for a purpose” meaning using suitable radioactively contaminated arisings from demolition of the above ground structures to infill unwanted voids. 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 engineering operations. Note that here the word “disposal” is being used in the environmental permitting sense relating to radioactive wastes and as used by the UK environment agencies in that context.
- 3.2 The permanent retention of radioactively contaminated below-ground structures in situ are, in environmental permitting terms, “waste”. However, that is not the case in planning terms. For comparison, non-radioactive redundant sub-surface structures left in the ground on former industrial sites are not regarded as “waste” in planning terms, even if contaminated by non-radioactive substances. Whilst the word “disposal” is used throughout the Environmental Statement that supports this planning application, this is because that is how the permanent retention of the redundant radioactive structures and void infill is considered within the environmental permitting regime. The use of the word “disposal” should not be taken to have specific meaning in planning terms. Also, the retention of these below-ground structures does not constitute “development”, under Section 55 of the Town and Country Planning Act 1990.
- 3.3 A new local (as against Trawsfynydd site wide) drainage system will be installed in the immediate vicinity of the demolished ponds complex. Key design objectives of the new drainage system will be to effectively interface with the existing site system to manage rainwater run-off from the new concrete cap, to direct the run-off water away from on-site roads<sup>4</sup>. In terms of function and quantity of rainwater captured, the new elements of this drains system are identical to the current arrangement.

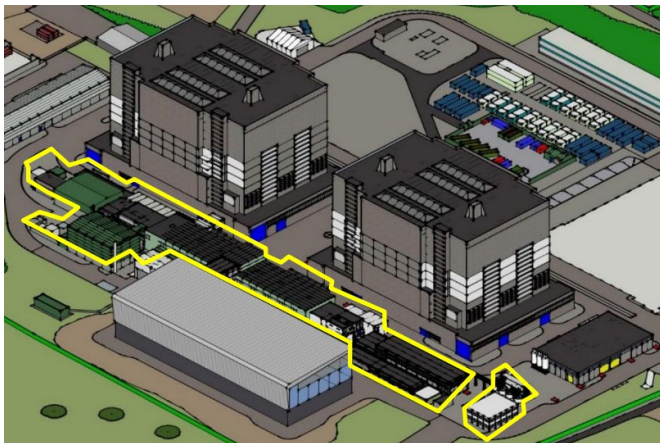


Figure 2: CGI of Trawsfynydd site with the ponds complex highlighted in yellow

<sup>4</sup> Captured rainwater will discharge to the existing site surface water drainage system rather than be directed to infiltrate the ground, this mainly being to avoid disturbance to any existing contaminated ground. Site storm drains lead to a “diversion culvert” pumping station at a topographically low point (within the area of the Applicant’s lease from NDA and immediately adjacent to the National Grid site), from where water is pumped to the lake as a permitted discharge.



Figure 3: CGI of Trawsfynydd site following completion of the proposed development



3.4 Further information on the specific facets of the proposed works is detailed below.

#### Ponds Complex Demolition

- 3.5 Prior to the commencement of the proposed development, all bulk asbestos and plant and equipment will have been removed except for very large plant items such as overhead cranes. Larger plant items will be removed during the demolition works.
- 3.6 Demolition includes the dismantling of the above-ground ponds complex structures (measuring approximately 230m in length by 45m in width at its widest point, and with a maximum height of 12.5m) but will also include the demolition of some ground-level structures such as suspended floors.
- 3.7 There will be use of new concrete formed on the floors of some below-ground voids, in order to protect the exposed metal reinforcement of the base of the south ponds lanes from future corrosion, and to prevent the walls of one specific void (the Active Effluent Treatment Plant (AETP) basement) from collapse when a suspended floor above it is removed.
- 3.8 Most of the demolition arisings is expected to be retained on-site for the purposes of void backfilling and this is discussed below, though this will depend on the bulking factors achieved.

#### In-Situ Disposal

- 3.9 "In-situ disposal", as referred to by the UK environment agencies, means leaving radioactively contaminated structures permanently in place as permitted radioactive waste disposals. In this development, in-situ disposal is proposed for the radioactively contaminated below-ground structures of the ponds complex, as well as for some relatively minor contaminated redundant infrastructure outside the ponds complex footprint (but within the Disposal Area shown in Figure 4). Apart from installing a concrete cap and new drainage over the disposals within the ponds complex footprint, the in-situ disposals would involve only relatively minor engineering operations such as the use of grout to reduce permeability in some places.

#### Disposal For A Purpose

- 3.10 "Disposal for a purpose", another term used by the UK environment agencies, applies to the emplacement of radioactive concrete and masonry demolition arisings in the below ground voids of the ponds complex. The term refers to the fact that if these radioactive demolition arisings were not used for the infill, then other material would have to be sourced for the same purpose.
- 3.11 In some voids there may be some use of either permeation grouting (after emplacement of demolition arisings) or a clean concrete layer (installed before emplacement of demolition arisings), specifically

where the base of the void is below the typical maximum water table level and joints in the concrete walls and floors of the voids are present below that level.

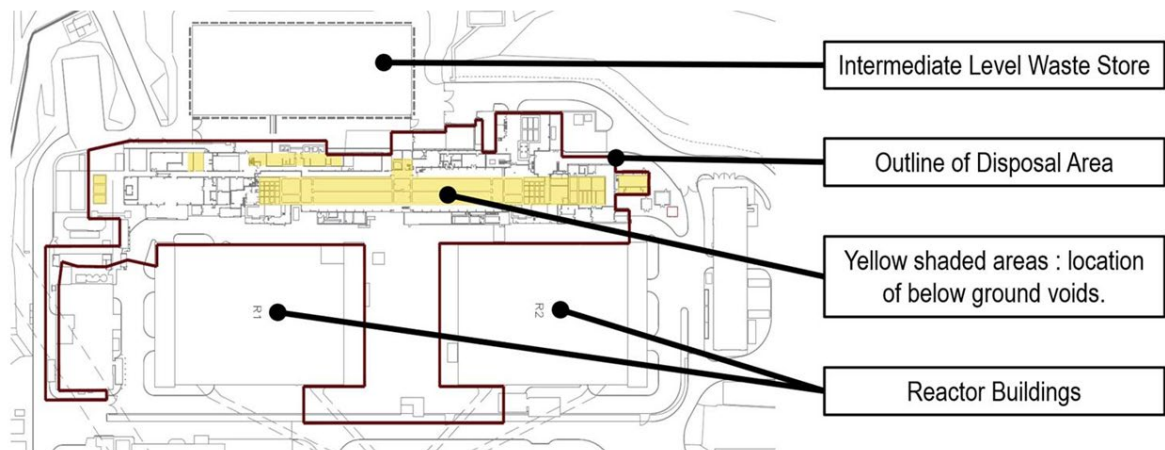


Figure 4: Graphic of the proposed on-site disposal area

### Capping

- 3.12 The demolished ponds complex area will be capped with a reinforced concrete capping slab upon completion of infilling of voids. The primary objectives of this cap are to provide resistance to infiltration of surface water (rainwater) and to allow the footprint of the ponds complex to be integrated within the operational area of the site to enable ongoing site decommissioning activities. The extent of the cap is shown in Figure 5; it will span all in-filled below ground voids.
- 3.13 Concrete for the capping slab may be batched on site or brought to site ready-mixed.

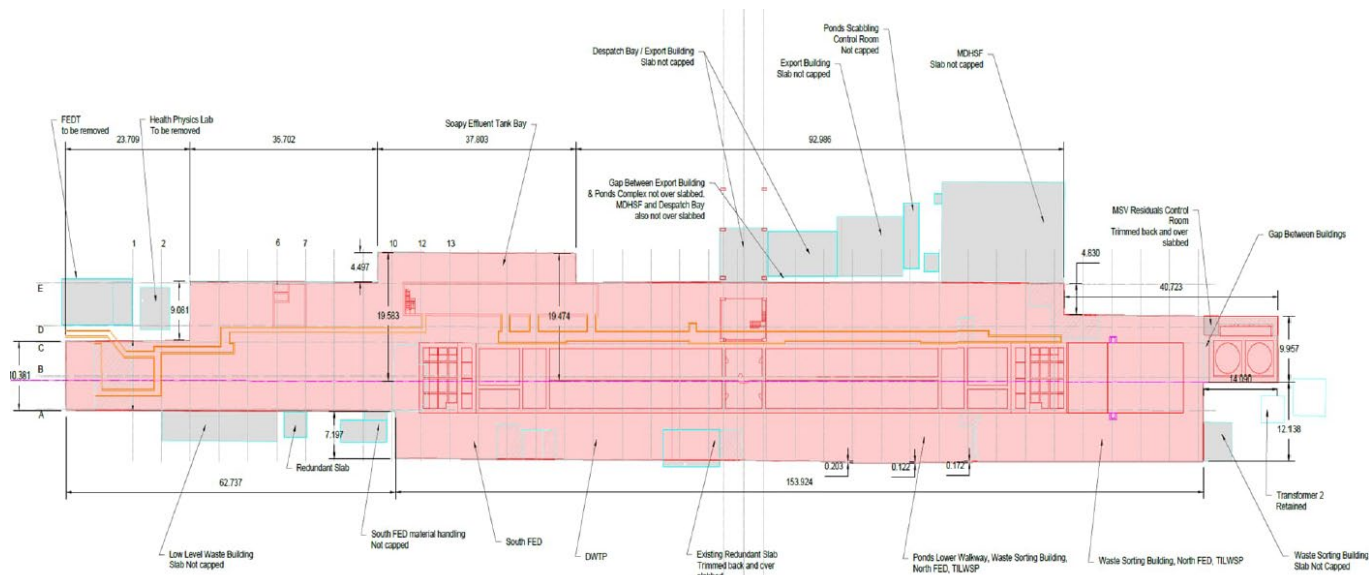


Figure 5: Extent of proposed concrete cap

### Drainage

- 3.14 The capping slab will be laid to falls and perimeter drainage will be incorporated to catch surface water runoff coming from the slab. The perimeter drainage will be in the form of linear channel drains installed using conventional shallow drainage construction techniques. Buried drainage pipes will also

be installed to outfall from the channel drains and connect into existing manholes. The extent of any excavations will be minimised. No ground dewatering is required or proposed either during construction or afterwards.

- 3.15 The site layout plan is shown on the drawing included at Appendix II of this statement.

### **The Rationale for the Proposals**

- 3.16 The Applicant is required under the terms of its environmental permit to determine and implement the use of optimum (and optimised) radioactive waste management (including disposal) routes. Recently published UK regulator guidance requires that, as part of the overarching optimisation requirement, operators like the Applicant must consider the options of on-site disposal of some low level radioactive wastes, such as leaving concrete structures in-situ or using suitable demolition arisings as backfill material.
- 3.17 The Environmental Statement that accompanies this planning application explains the benefits of such an on-site disposal approach at Trawsfynydd. Some of the potential benefits are the reduced need for off-site transport, reduced worker doses, reduced costs and reduced use of off-site radioactive waste disposal capacity. Perhaps the main and most compelling reason for in-situ disposal being proposed for the underground parts of the ponds complex and associated underground features within the Disposal Area at Trawsfynydd is the significant engineering challenge involved in reaching a clean, non-radioactive end state for this part of the site (where a substantial volume of radioactively contaminated ground is also present). Given that most of the radioactivity inventory is in the sub-surface, the disposal of demolition arisings from the above-ground parts of the structures by infilling below-ground voids then becomes favourable too.

## 4. Consultation & Community Engagement

### Preface

- 4.1 A Statement of Community Involvement (SCI) (Document Reference: AY/17C000085/SCI/02) accompanies this planning application and provides a summary and record of the public engagement undertaken in respect of the proposals.
- 4.2 The SCI includes details of discretionary and mandatory pre-application consultation with the National Park Authority, local community and wider stakeholders. Details of the formal request for an Environmental Impact Assessment (EIA) screening opinion and scoping opinion are provided below.

### EIA Screening Opinion

- 4.3 The Applicant submitted a formal request for a screening opinion to Eryri National Park Authority (ENPA) on 26 January 2022. On 13 May 2022, ENPA issued a positive screening determination confirming the likely impact of the proposed development on the environment will require the submission of an Environmental Statement (ES). The screening determination was on the basis of the proposed development being Schedule 2 development – threshold exceeded / criterion met or Sensitive Area and likely to have significant effects.
- 4.4 A copy of the LPA's screening opinion is enclosed at Appendix III of this statement.

### EIA Scoping Opinion

- 4.5 Further to the Authority's positive EIA screening opinion (Ref: NP5/73/287J - dated 13 May 2022), a formal request for a scoping opinion was submitted to ENPA on 15 September 2022, pursuant to Regulation 14 of The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017.
- 4.6 The Authority issued its scoping opinion (Ref: NP5/73/287M) on 30 November 2022 broadly agreeing that the scoping report (Ref: 807521-WOOD-XX-XX-RP-QA-000001), prepared by Wood Group UK Limited, addresses the main issues for consideration.
- 4.7 In light of Natural Resources Wales (NRW) consultation response to the request for a scoping opinion, the Applicant submitted further information to ENPA on 02 February 2023. This mainly related to the groundwater monitoring arrangements to support the proposed on-site disposals of the cooling ponds complex and near-by features. In response to this, ENPA issued a revised scoping opinion, dated 23 March 2023, acknowledging the submission of further information regarding groundwater monitoring.
- 4.8 A copy of the LPA's revised scoping opinion is enclosed at Appendix IV of this statement.

## 5. Planning Policy Context

### Preface

- 5.1
- Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that an application for planning permission should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.2
- The following sections record the main provisions of the principal statutory planning documents and strategies of relevance. It establishes the context within which the proposals will need to be brought forward.
- 5.3
- National guidance comprises Future Wales (The National Plan) (February 2021), Planning Policy Wales Edition 12 (PPW) (February 2024) as well as a range of supplementary Technical Advice Notes (TANs). At the local level, the Eryri Local Development Plan (ELDP), which was adopted in February 2019, constitutes the statutory Development Plan against which the proposals will be assessed. Following a review of the applicable planning constraints, policies of relevance in terms of both the national and local context are set out below.

### Planning Constraints

- 5.4
- The site is located within Eryri National Park. According to the proposals map (extract below) accompanying the revised Eryri Local Development Plan (ELDP), the site falls outside the settlement boundary and within an area of countryside. The site is located adjacent to an area of natural beauty.
- 5.5
- The site is specifically allocated in the ELDP as the 'Trawsfynydd Snowdonia Enterprise Zone' (SEZ) and forms part of the wider 'Welsh Government Enterprise Zone'.

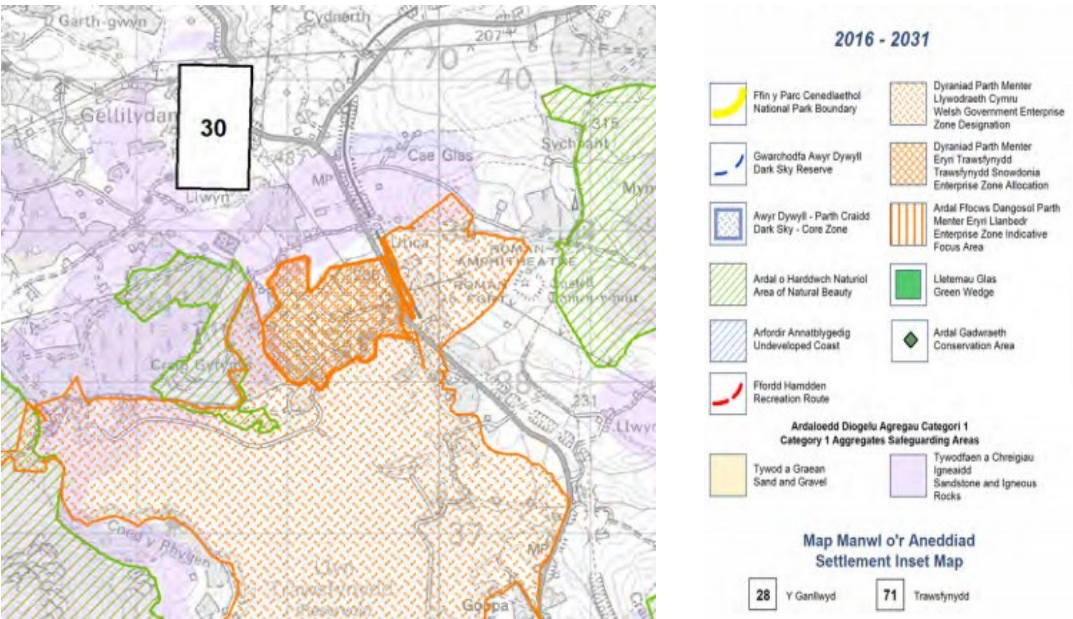


Figure 6: Extract from Adopted ELDP Proposals Map

- 5.6
- In terms of heritage features, there are no listed buildings or Scheduled Ancient Monuments (SAMs) on the site<sup>5</sup>.

<sup>5</sup> There is a SAM (Cadw Reference ME163) within the Nurse Cae-du woodland, to the north of the site, which comprises the remains of a small but substantial and undisturbed enclosed settlement, which probably dates to the late prehistoric or Romano-British periods. There are also grade II listed buildings to the northeast at Creigiau Duon (an early 19th Century farmhouse) and southeast at Coed Cae-du (a 16th Century farmhouse).



- 5.7 The Grade II\* registered historic park and garden known as Former Nuclear Power Station at Trawsfynydd: Dragon Square and Dame Sylvia Crowe Garden (PGW (Gd) 64(GWY)) partly lies adjacent to the Application Site. The designation comprises a formal garden (Dragon Square) and informal gardens (Dame Sylvia Crowe Garden) with terracing and pool, which were designed by the landscape architect Dame Sylvia Crowe as part of the wider landscaping treatment for the Trawsfynydd nuclear power station. The gardens were designed to be part of the operational site of which the ponds complex formed a part. The ponds complex is minimally visible from within Dragon Square and at its southern end lies opposite the Dame Sylvia Crowe Garden. However, both gardens fall within the NLS boundary and neither is accessible to the public.
- 5.8 The Trawsfynydd site is not subject to a statutory ecological designation. However, Sites of Special Scientific Interest (SSSI) are located to the east and west of the NLS, adjacent to Llyn Trawsfynydd. A Special Protection Area (SPA) and Special Area of Conservation (SAC) are also located to the east and a National Nature Reserve (NNR) lies to the west of the Trawsfynydd site. An area of ancient woodland is located adjacent to the site's north-western boundary.
- 5.9 A cycle route skirts along the reservoir to the south of the site, before wrapping around the western boundary and converging with a public footpath to the north.
- 5.10 According to the Natural Resources Wales (NRW) Development Advice Map (DAM), accompanying Technical Advice Note 15 (Development and Flood Risk) and Flood Map for Planning, the site is not located within an area of known flood risk. However, the Flood Map for Planning identifies a portion of the site is at medium risk of flooding (1% (1 in 100) chance of flooding in a given year, including the effects of climate change) from surface water and small watercourses (Flood Zone 3).

## National Planning Policy

### UK Policy Framework for Managing Radioactive Substances and Nuclear Decommissioning (May 2024)

- 5.11 This document has been developed by the UK Government and devolved administrations. Its purpose is to provide a coherent UK-wide policy framework for managing radioactive substances and nuclear decommissioning.
- 5.12 Section 8 (managing radioactive waste in the nuclear and non-nuclear sectors) of the Framework provides information regarding the potential for the on-site disposal of suitable radioactive waste. The Framework outlines that, during the final stages of decommissioning and clean-up of nuclear facilities, as buildings are demolished, very large amounts of rubble are generated. A small percentage of this material may be lightly contaminated with radioactivity. In addition, there may be contaminated substructures, pipelines and soils on the sites. Excavating this waste, packaging it, and transporting it for disposal in approved facilities off-site can result in negative impacts, such as increasing the risks to workers' health and safety during excavation, increased HGV traffic and associated noise, dust, pollution and carbon dioxide emissions. Therefore, this Framework supports the disposal and monitoring of contaminated waste on site, rather than to excavate it and transport it for disposal elsewhere.

### Nuclear Decommissioning Strategy

- 5.13 The preface to NDA Strategy 4 (March 2021) states: *"We work with UK government and the devolved administrations to ensure their policies are reflected in our strategy and implemented at our sites."* It is noted in its Section 4 ("Site Decommissioning and Remediation") that the UK regulatory framework is being amended to allow for on-site disposals of radioactive wastes at nuclear licensed and permitted sites without foreclosing eventual site delicensing and surrender of site environmental permits. At Section 4.3 the NDA strategy states that site end states must be optimised, meaning that all options need to be considered. In Section 7.1 ("The Vision: The Disposal Capability Needed to Complete the Mission") the options of on-site disposal either in-situ or for a purpose (e.g. filling voids) of some

radioactive wastes are discussed. It is stated that such disposals are regulated and that any on-site disposals must be shown to be safe and provide the best outcome for the environment as a whole.

- 5.14 In March 2019, the Applicant proposed a change to the site end-state assumption for Trawsfynydd to include leaving in place some of the lightly contaminated subsurface structures and using concrete from demolition of above ground structures as infill for unwanted subsurface voids. This change has been endorsed and adopted by the NDA through its Strategy Management System.

### **Future Wales (The National Plan)**

- 5.15 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. The document is largely silent on the issue of waste disposal and it makes no reference to radioactive waste management.
- 5.16 Policy 24 (North West Wales and Energy) focuses on new energy development and investment within the Anglesey Energy Island Programme, Wylfa Newydd and Trawsfynydd. The sub-text to the policy recognises Trawsfynydd as a former nuclear power station with the necessary infrastructure and local skills in place for the potential future development of a Small Modular Reactor.

### **Planning Policy Wales (PPW)**

- 5.17 PPW (Edition 12) sets out the land use planning policies of the Welsh Government. This contains guidance for the preparation of Local Authority's development plans, development management, and sets out the Welsh Government's commitment to creating sustainable developments.
- 5.18 The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015 and the Well-being of Future Generations (Wales) Act 2015.
- 5.19 Planning policies, proposals and decisions must seek to promote sustainable development and support the well-being of people and communities across Wales. PPW suggests this can be achieved by using the "five ways of working" and by maximising their contribution to the achievement of the seven well-being goals given in the Well-being of Future Generations Act.
- 5.20 The seven well-being goals within the Well-being of Future Generations Act provide a shared vision to work towards – emphasis is placed on the importance of achieving all the goals within a proposal:
- A prosperous Wales: *"An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work".*
  - A resilient Wales: *"A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change)".*
  - A healthier Wales: *"A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood".*
  - A more equal Wales: *"A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio economic background and circumstances)".*
  - A Wales of more cohesive communities: *"Attractive, viable, safe and well-connected communities".*
  - A Wales of vibrant culture and thriving Welsh language: *"A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation".*

- A globally responsible Wales: *“A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being”.*

5.21 PPW also identifies five key principles that provide a guiding vision for all development plans. These are as follows:

1. Growing our economy in a sustainable manner: *“The planning system should enable development which contributes to long term economic well-being, making the best use of existing infrastructure and planning for new supporting infrastructure and services. Communities, national and local government, businesses, and the third sector must work together to take a long term view, integrating and aligning priorities through greater collaboration to achieve sustainable economic benefits for all in line with the well-being goals”.*
2. Making best use of resources; *“The efficient use of resources, including land, underpins sustainable development. The planning system has a vital role to play in making development resilient to climate change, decarbonising society and developing a circular economy for the benefit of both the built and natural environments and to contribute to the achievement of the well-being goals. The proximity principle must be applied to ensure problems are solved locally rather than passing them on to other places or future generations. This will ensure the use of land and other resources is sustainable in the long term”.*
3. Facilitating accessible and healthy environments: *“Our land use choices and the places we create should be accessible for all and support healthy lives. High quality places are barrier-free and inclusive to all members of society. They ensure everyone can live, work, travel and play in a way that supports good physical and mental health. Our built and natural environments should be planned to promote mental and physical well-being. The best way of achieving this is to involve and collaborate with others to ensure issues are understood and prevented at the earliest opportunity through effective engagement with those affected by or having an interest in the development concerned”.*
4. Creating & sustaining communities: *“The planning system must work in an integrated way to maximise its contribution to well-being. It can achieve this by creating well-designed places and cohesive rural and urban communities which can be sustained by ensuring the appropriate balance of uses and density, making places where people want to be and interact with others. Our communities need the right mix of good quality/well designed homes, jobs, services, infrastructure and facilities so that people feel content with their everyday lives”.*
5. Maximising environmental protection and limiting environmental impact: *“Natural, historic and cultural assets must be protected, promoted, conserved and enhanced. Negative environmental impacts should be avoided in the wider public interest. This means acting in the long term to respect environmental limits and operating in an integrated way so that resources and/ or assets are not irreversibly damaged or depleted. The polluter pays principle applies where pollution cannot be prevented and applying the precautionary principle ensures cost effective measures to prevent environmental damage”.*

5.22 Paragraph 6.3.10 of PPW relates to major development within National Parks or AONBs and states that special considerations apply to major development proposals which are more national than local in character. It states that major developments should not take place in National Parks or AONBs except in exceptional circumstances<sup>6</sup>. It states that consideration of applications for major developments should therefore include an assessment of:

- the need for the development, in terms of national considerations, and the impact of permitting it or refusing it upon the local economy;
- the cost of and scope for providing the development outside the designated area or meeting the need for it in some other way; and

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<sup>6</sup> PPW states that this may arise where *“there is demonstrated to be an overriding public need, refusal would be severely detrimental to the local economy and there is no potential for locating the development elsewhere or meeting the need in some other way”*. Since TAN 21 states that waste facilities can be permitted within the national park, it is assumed that the PPW is not restricting major development in the park to the specific circumstances quoted here.



- any detrimental effect on the environment and the landscape, and the extent to which that could be moderated and/or mitigated.

5.23 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). PPW 12 provides clarity on securing net benefit for biodiversity through the application of the stepwise approach, including the acknowledgement of off-site compensation measures as a last resort, and the need to consider enhancement and long-term management at each step. Accordingly, the application is supported by a Biodiversity Enhancement Strategy and a Green Infrastructure Statement.

#### Technical Advice Notes (TANs)

5.24 As set out above, PPW is supplemented by a series of Technical Advice Notes (TANs). A range of these apply to the proposed development, and their specific provisions are addressed through the information submitted in support of this planning application. Relevant TANs include:

- **Technical Advice Note 5 (Nature Conservation & Planning)** was published in September 2009 and provides advice about how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation.
- **Technical Advice Note 11 (Noise)** was published in 1997 and provides guidance on how the planning system can be used to minimise the adverse impacts of noise without placing unreasonable restrictions on development or adding unduly to the costs and administrative burdens on business. The Welsh Government is preparing to undertake a review of TAN11 to incorporate air quality and soundscape as well as noise pollution, in order to support the new planning policy in PPW relating to air quality and soundscape.
- **Technical Advice Note 18 (Transport)** was published in 2007 and recognises the key role of the planning system to facilitate sustainable travel patterns. Though the TAN is not directly relevant to the proposed development, the issue highlighted in the TAN, that of sustainability in transport, is part of the reasoning for the proposed on-site disposals, since the alternative of off-site disposals would result in greater volumes of HGV traffic.
- **Technical Advice Note 20 (Planning and the Welsh Language)** The latest version was published in October 2017 and provides guidance on how the planning system considers implications of the Welsh language. TAN 20 has been produced to assist local planning authorities in the preparation, monitoring and review of their Local Development Plans. A Welsh language assessment has been submitted as part of the present application.
- **Technical Advice Note 21 (Waste)** was first published in February 2014 and most recently revised in 2017. It is limited in its provision for radioactive waste. However, it does acknowledge that the treatment of radioactive waste and planning issues will depend on the waste's categorisation – low, intermediate or high level.

Paragraph 4.2 of the TAN requires a Waste Planning Assessment (WPA) to be submitted with all applications for a waste facility classified as a disposal, recovery or recycling facility. A WPA has been included at Appendix VII of this statement.

Paragraph 4.68 of the TAN confirms that *"each proposal should be considered on a case by case basis, taking account of factors including the nature, type, size, need and location of the development. Site specific issues will vary depending on the scale, waste treated and the nature of the proposal and its proposed location."*

At paragraph 8.2, the TAN states: *"Facilities should not have an adverse impact on areas or sites designated for local, national or international protection, such as:*

*World Heritage sites;  
Areas of Outstanding Natural Beauty;  
National Parks;  
National Nature Reserves;  
Sites of Importance for Nature Conservation;  
Sites of Special Scientific Interest;*

*Special Areas of Conservation;  
SPAs; or  
RAMSAR sites”;*

Paragraph 8.3 of the TAN states: *“This does not preclude suitable proposals for waste facilities located within the boundaries of National Parks and other similar designated areas, provided that they are appropriately designed.”*

The Waste Planning Practice Guide is supplementary guidance supporting TAN 21, aiming to provide planning officers and local authority members with an understanding of the different types of waste infrastructure which may come forward as a development proposal. This guidance document does not include any information specific to radioactive waste generated from nuclear licensed sites.

- **Technical Advice Note 23 (Economic Development)** was published in February 2014 and focuses on the need to encourage development in order to generate wealth, jobs and income. This TAN recognises the importance of all aspects of development and that planning decisions are made in a sustainable way which balance social, environmental and economic considerations.
- **Technical Advice Note 24 (The Historic Environment)** was published in May 2017 and provides guidance on how the planning system considers the historic environment during development plan preparation and decision making on planning and listed building applications.

## Local Planning Policy

- 5.25 The Planning and Compulsory Purchase Act 2004 introduced the requirement for all local planning authorities to produce a new form of development plan for their areas – a Local Development Plan (LDP). Accordingly, the Unitary Development Plan was superseded by the Eryri LDP (ELDP) following its adoption in February 2019.
- 5.26 Many of the EDLP policies refer to the “special qualities” of the national park. These are given at paragraph 1.31 of the EDLP as follows:
- *“The diversity of high quality landscapes and coastal areas within a small geographic area – ranging from coast to rolling uplands to the rugged mountains for which Snowdonia is famed.*
  - *The robust sense of community cohesion, belonging and vibrancy which combine to give a strong ‘sense of place’.*
  - *Continuing vibrancy of the Welsh language as the primary language in social and professional environments. This aspect is evident in local place names that reflect the area’s cultural heritage.*
  - *An area which has inspired some of the nation’s most notable culture, folklore, art, literature and music, which continues to inspire to the present day.*
  - *The opportunity for people to understand and enjoy the National Park actively, whilst maintaining areas of tranquillity and solitude, thus promoting aspects of health and wellbeing.*
  - *Landscapes and townscape which chart human impact over centuries, from Neolithic times to the present day. This is evident in archaeological remains, place and field names, oral and written history and present day land management practices. Its architectural heritage is reflected in the density of Listed Buildings and the wider historic environment.*
  - *Complex, varied and renowned geology, vital in influencing the disciplines of geology and geography internationally.*
  - *Varied biodiversity reflecting Snowdonia’s landscapes, geology, land management practices and climate. Some notable species and habitats are of national and international significance, for example species which are remnants of the last ice age, providing a glimpse of semi-Arctic habitats. Snowdonia is the most southerly point in the UK for many such species.*
  - *Extensive opportunities for recreation, leisure and learning for people of all ages and ability combined with areas of tranquillity.”*
- 5.27 It is not considered that the proposals harm any of these special qualities in any respect, and indeed the proposals are positive in this regard in progressing the clearance of the Trawsfynydd NLS. This is discussed more in section 6 below. Furthermore, the Applicant has committed to biodiversity enhancement as part of the proposals.

- 5.28 ELDP policy supports the on-going decommissioning and remediation process at Trawsfynydd. The plan acknowledges that this is a process governed by national strategies which are subject to regular review and consultation, and which are recognised as material considerations in planning decisions.
- 5.29 Taking into account the site's context and applicable designations, the following planning policies of the LDP are considered relevant to the proposals:

**Strategic Policy A: National Park Purposes and Sustainable Development (A)** - The Local Development Plan seeks to ensure that new development promotes the principles of sustainable development in ways which further National Park purposes and duty whilst conserving and enhancing the National Park's 'Special Qualities'. Proposals which compromise National Park purposes will be refused. The following considerations should be taken into account to help deliver sustainable development in Snowdonia:

- i. Give the highest priority to the protection and enhancement of the natural beauty, wildlife and cultural heritage.
- ii. Promote opportunities for the understanding and enjoyment of the 'Special Qualities' of the area by the public.
- iii. Safeguarding and improvement of the health, safety, economic and social well-being of local communities.
- iv. Conserve and enhance the characteristic biodiversity of Snowdonia.
- v. Respecting and enhancing the historic environment.
- vi. Efficient use of land and infrastructure.
- vii. Conservation of the quality and quantity of natural resources including water, air, soil and geodiversity.
- viii. Encourage the sustainable development of settlements in ways which respect their character and function within the settlement strategy.
- ix. Enablement of inclusive access to services, facilities and employment whilst minimising the environmental impact of transport.
- x. Provision of good quality sustainable design.
- xi. Promotion of development which meets the housing needs of local communities through a mix of dwelling types, and tenures predominantly through affordable housing to meet local need.
- xii. Encouragement of developments that conserve, promote and enhance the linguistic heritage of Snowdonia's communities.
- xiii. Securing development of previously developed land (brownfield land) where that land is in a sustainable location in preference to greenfield sites.
- xiv. Preventing inappropriate development in areas which are at risk from flooding or which contribute to the risk of flooding.
- xv. Enabling the production of Place Plans and adopting as Supplementary Planning Guidance where appropriate.

- 5.30 Strategic Policy A sets out what the National Park Authority believes will help deliver sustainable development. Emphasis is placed on the National Park designation and the importance of protecting its high-quality landscape and sensitive environment. In the context of this planning application, criteria X and XI are not relevant since there are no buildings/structures to be designed and housing is not proposed.
- 5.31 Section 61(1) of the Environment Act 1995 sets out the statutory purposes of National Parks as:
1. conserving and enhancing their natural beauty, wildlife and cultural heritage; and
  2. promoting opportunities for public understanding and enjoyment of their special qualities.
- 5.32 To assess the proposals' effects on both the character of the landscape and the integrity of the National Park's environment, the proposed development has been divided into elements that are discussed in the context of this policy in turn below:
- **Demolition** (*i.e. dismantling of the above-ground ponds complex structures will include the demolition of some below ground structures, such as internal void walls and suspended floors*) – The demolition of a number of buildings and structures on the site will result in long-term visual betterment. This will enhance the natural beauty and special qualities of the area and paves the way for future uses of the site, which could provide a public benefit.
  - **On-Site Disposal** (*i.e. leaving suitable radioactively contaminated below-ground structures permanently in place and emplacement of radioactive concrete and masonry demolition arisings in the belowground ponds complex voids*) – The disposal of waste on-site is largely a matter that is governed by the environmental regulator, NRW. A separate permitting application has been submitted to NRW for the proposed disposals and will be considered in the context of the relevant legislation. All waste needs to be managed safely and disposed of somewhere suitable. This might be on the site that

produced the waste, or it might be transported to a waste disposal site elsewhere. Either of these methods of disposal will result in effects on the environment that need to be weighed in the planning balance. Recently published UK regulator guidance requires the Applicant to consider the on-site disposal of some low level wastes, such as leaving concrete structures in-situ or using suitable waste as backfill material. This is considered to be a suitable and effective strategy to deal with some of the waste from the demolition of the Trawsfynydd ponds complex and will result in benefits to the environment by, amongst other matters, avoiding the need for off-site transport involving many heavy-goods vehicle movements for off-site controlled burial of the waste and the avoidance of material imports to fill voids, as well as reduced worker doses. In view of this, and to facilitate essential wider decommissioning work at the site, the impact of the on-site disposal of suitable waste on the environment and special qualities of the national park is considered to be neutral.

- **Capping** (i.e. constructing a reinforced concrete capping slab upon completion of infilling of voids) – The construction of a cap which will extend over contaminated ground slabs remaining in-situ and will span all in-filled below ground ponds complex voids. This will have minimal protrusion above ground-level and will form an operational area to facilitate future planned decommissioning work, particularly given its central position within the site adjacent to, and screened by, the reactor buildings and Intermediate Level Waste store. On this basis, the proposed cap will have a minimal impact upon the character of the landscape and the integrity of the environment and would assist with future decommissioning efforts, which when complete will enhance the natural beauty and special qualities of the area.

**Strategic Policy B: Major Development (B)** – Major development will not be permitted within the National Park other than in exceptional circumstances where there is demonstrated to be an overriding public need. Proposals for major development will be subject to the most rigorous examination and include an assessment of all the following:

- i. the need for the development in terms of national considerations.
- ii. the cost of and scope for siting the development outside the National Park or the ability to meet the need for the development in some other way.
- iii. the consequences and impact on local communities, the local economy, the environment and the cultural heritage of the National Park of permitting or refusing the development.
- iv. the impact the development would have on National Park purposes and the extent that these could be moderated through appropriate and acceptable mitigation measures.

Where the Authority consider that the overall outcome of this assessment will result in an adverse and unacceptable impact on the National Park, permission for such major development will be refused.

- 5.33 The ELDP does not define "major development", albeit examples are given which are of a scale that far exceeds the application proposals. James Maurici KC has provided legal opinions to the Authority on two occasions on what constitutes 'major development' in the context of the National Park. These opinions have been adopted in the LPA's decision-making. Based on these principles, there is no rigid view on what constitutes major development in a National Park, which is a matter of judgement for the decision-maker and requires consideration of the proposals in the local context. The LPA confirmed during the pre-application meeting that the proposals constitute major development and, therefore, the proposals have been assessed in the context of Strategic Policy B.
- 5.34 Strategic Policy B reflects statements made in Planning Policy Wales, which states: "*Major developments should not take place in National Parks or AONBs except in exceptional circumstances. This may arise where, after rigorous examination, there is demonstrated to be an overriding public need, refusal would be severely detrimental to the local economy and there is no potential for locating the development elsewhere or meeting the need in some other way*".

5.35 The policy also requires the proposals to be assessed against criteria i-iv, as follows:

Policy Criteria (Strategic Policy B)	Commentary
i. The need for the development	The NDA is the strategic authority responsible for managing the effective and efficient clean-up of the UK's nuclear legacy, which includes the Trawsfynydd site. Land within the Nuclear Licensed Site (NLS) is subject to decommissioning of redundant facilities. In terms of the on-site disposal of suitable waste, Trawsfynydd site has been identified as one of three 'lead and learn' sites in respect of site end-states. In March 2019, the Applicant revised the site end-state assumption for Trawsfynydd to include leaving in place some of the lightly contaminated subsurface structures and using concrete from demolition of above ground structures as infill for unwanted subsurface voids. This change has been endorsed by the NDA. More importantly, in regulatory (environmental permit) terms, the Applicant is required to use optimum waste management routes applied in an optimised manner <sup>7</sup> ; the Applicant believes that the present proposals meet this permit requirement. NRW will only grant the necessary permit if they support this strategy and agree that this disposal option is the optimum option, being implemented in an optimised manner.
ii. Whether the development could be located outside the National Park	The demolition element of the proposal forms part of the decommissioning works of the former power station and, therefore, needs to take place on-site. Whilst it may be possible to remove some or all of the demolition arisings or their radioactive constituents from the site and dispose of these outside the national park, the reasons for not doing so in this case are explained above, and in the Alternatives section of the Environmental Statement.
iii. Community, economic, environmental, cultural and heritage considerations	The impacts of the proposed development on these specific matters are acceptable, the reasoning for which is discussed in detail in Section 6 of this statement.
iv. Whether the impacts of the proposed development on national park purposes can be moderated/mitigated	The various elements of the proposed development have been considered in relation to the statutory purposes of national parks and the special quality of Eryri national park in particular. The Applicant does not consider that the proposed development is detrimental to the objectives for national parks, nor is it detrimental to the special qualities, given that the environmental permit variation required would not be granted unless NRW, the competent authority in respect of ground and surface water pollution, were satisfied that the technical requirements and long-term environmental impact standards have all been met. The Applicant has submitted substantial documentation to NRW with its permit variation application which it believes shows all these matters are addressed and the environmental impacts acceptable.

5.36 Overall, the decommissioning and demolition of the ponds complex at Trawsfynydd is essential to facilitate on-going and planned decommissioning works at the site, which is in the public interest. The on-site disposal of suitable lightly contaminated radioactive waste complies with NDA strategy and will result in benefits to the environment, with any adverse impacts that can be moderated / mitigated through the planning process and via controls in place under separate regulatory regimes. The proposals are therefore compliant with Strategic Policy B.

<sup>7</sup> In GRR terms, these relate to Requirements R1 and R13 respectively.



**Development Policy 1: General Development Principles (1)**

- To conserve and enhance the ‘Special Qualities’ and purposes of the National Park, development will only be permitted where all the following apply:
- i. The nature, location and siting, height, form and scale of the development is compatible with the capacity and character of the site and locality within which it is located.
  - ii. A development within the domestic curtilage of a dwelling will not detract from the character and form of the existing dwelling or its setting in the landscape.
  - iii. The development is not unduly prominent in the landscape and will not significantly harm the amenity of neighbouring property.
  - iv. The development reflects a good sustainable design standard, uses materials that are sympathetic to or enhance their surroundings and conforms with Development Policy 6: Sustainable Design and Materials.
  - v. The development will not have an unacceptable adverse impact on the characteristic biodiversity of Snowdonia, particularly habitats and species protected under national and European legislation.
  - vi. The development does not result in the loss of landscape features, including woodland, and Ancient Semi-Natural woodland in particular, healthy trees, hedgerows, dry stone walls or damage any important open space or public view.
  - vii. An appropriate access meeting highway standards exists or can be provided without harm to the character of the locality or neighbouring amenity.
  - viii. Adequate provision of car parking and on-site turning areas are provided where necessary which are appropriate to the scale of the proposed development. Car parking surfaces should be permeable where appropriate to the development.
  - ix. The traffic implications of the development do not result in volumes or types of traffic which will create highway or safety problems on the local road network, or significantly harm the landscape or amenity of local people.
  - x. Appropriate services and infrastructure can be provided without compromising the quality and character of the landscape and cultural heritage.
  - xi. The development will not have an unacceptable adverse impact, through increased resource use, discharges or emissions, on public health, surface and groundwater (quality, quantity or ecology), air quality, soil and the best and most versatile agricultural land.
  - xii. The development is compatible with, and does not cause significant harm, to the environment, neighbouring residential amenity or the amenity of the Park by way of noise, dust, vibration, odour, light pollution, hazardous materials or waste production.
  - xiii. The development will not have an unacceptable adverse impact on the quiet enjoyment of the area by the public.
  - xiv. The development will not have an unacceptable adverse impact on public rights of way, other recreational routes or open country.
  - xv. Land stability can be achieved without causing unacceptable environmental or landscape impact.
  - xvi. The risks of, and consequences of flooding can be managed on and off site to an acceptable level in line with national planning policy.

5.37 Development Policy 1 includes broad requirements which it expects all development should meet if it is to be acceptable within the National Park. Proposals must be acceptable in terms of their impact on the landscape, natural environment, cultural heritage, opportunities for understanding and enjoyment, quality and design, sustainable use of resources, amenity, highway safety, flood risk and infrastructure. The matters relevant to the consideration of the application have been addressed in the Environmental Statement that supports this application or in standalone technical assessments. A summary of position of each criterion of Development Policy 1 has been provided in the following table.

Policy Criteria (Development Policy 1)	Commentary
i. The development is compatible with the capacity and character of the site and locality within which it is located.	The ponds complex is wholly located within, and forms part of, the Trawsfynydd NLS, which is a nuclear power station being decommissioned. The proposals to decommission and demolish the ponds complex are compatible with strategy for and character of the site.
ii. A development within the domestic curtilage of a dwelling will not detract from the character and form of the existing dwelling or its setting in the landscape.	The proposals do not relate to a domestic dwelling. This criterion is, therefore, not relevant.

iii. The development is not unduly prominent in the landscape and will not significantly harm the amenity of neighbouring property.	The development is largely a demolition project, which will remove redundant buildings and structures from the site. The on-site disposal of suitable waste will take place below-ground, with only the concrete cap over the former ponds complex being eventually visible. This will not be overly obtrusive in the landscape. Matters relating to neighbouring amenity will be addressed in the 'Planning Issues' section of this statement and the accompanying Environmental Statement.
iv. The development reflects a good sustainable design standard.	Following completion of the works, the only visible structure will be the concrete cap that will form an operational area to assist with future decommissioning. Given the nature of this structure there are limited options for the consideration of different materials. However, the concrete will be sourced as sustainably as possible.
v. The development will not have an unacceptable adverse impact on the characteristic biodiversity of Snowdonia.	Matters relating to the impact of the proposals on biodiversity have been assessed in the Environmental Statement.
vi. The development does not result in the loss of landscape features.	The proposals relate to the demolition of buildings and structures that form part of the power station. There are no landscape features on the Application Site.
vii. Appropriate access meeting highway standards exists or can be provided.	The power station site is served by an existing point of access that will not be changed as part of the proposals and is suitable to serve the proposed works.
viii. Adequate provision of car parking and on-site turning areas are provided.	There is an existing contractor and staff car park serving the wider NLS, with sufficient capacity and manoeuvring space. This is not proposed to be altered.
ix. The traffic implications of the development do not result in volumes or types of traffic which will create highway or safety problems on the local road network.	Given the nature of the proposals, which seek to dispose of suitable waste on the site, there will be limited transport movements associated with the proposals. On this basis, this matter has been scoped out of the Environmental Statement. However, it is discussed in the 'Planning Issues' section of this Planning Statement.
x. Appropriate services and infrastructure can be provided without compromising the quality and character of the landscape and cultural heritage.	The wider NLS is served by existing site services and infrastructure. As such, there is no requirement for further provision that may otherwise harm the landscape or cultural heritage of the area.
xi. The development will not have an unacceptable adverse impact, through increased resource use, discharges or emissions.	The proposals to dispose of much of the waste on-site will limit the use of resources (i.e. fill material that may otherwise need to be imported) and discharges or emissions (i.e. through transport movements). The matter of air quality has been scoped-out of the Environmental Statement, although information is included in the 'Planning Issues' section of this Planning Statement.
xii. The development is compatible with, and does not cause significant harm, to the environment, neighbouring residential amenity or the amenity of the Park.	Matters that may have implications for the environment or amenity (for example the potential for noise) are summarised in the 'Planning Issues' section of this Planning Statement.
xiii. The development will not have an unacceptable adverse impact on the quiet enjoyment of the area by the public.	The proposals are isolated to a specific part of the NLS and involve the demolition of buildings and structures to enable continued decommissioning of the site and eventual future uses. Works phase noise impacts are discussed in the 'Planning Issues' section of this Planning Statement.
xiv. The development will not have an unacceptable adverse impact on public rights of way, other recreational routes or open country.	The proposals are wholly located within the NLS boundary, which is security controlled and is not traversed by any public rights of way.

xv. Land stability can be achieved without causing unacceptable environmental or landscape impact.	It is proposed to backfill existing below-ground structures with suitable demolition arisings from the ponds complex. This will not result in land stability issues for the wider area. The Applicant has taken into account long-term stability in the detailed design of the proposals, including in relation to sub-surface structures and the cap.
xvi. The risks of, and consequences of flooding can be managed.	According to the Natural Resources Wales (NRW) Development Advice Map (DAM), accompanying Technical Advice Note 15 (Development and Flood Risk) and Flood Map for Planning, the site is not located within an area of known flood risk. However, the Flood Map for Planning identifies a portion of the site is at medium risk of flooding (1% (1 in 100) chance of flooding in a given year, including the effects of climate change) from surface water and small watercourses (Flood Zone 3). As discussed in the 'Planning Issues' section of this Planning Statement, the proposals will not increase flood risk elsewhere.

#### Strategic Policy Ch: Social and Physical Infrastructure in new developments (CH)

New development of a scale which has wider community and services impact will be assessed on a case by case basis and should, where practical and viable make a contribution to social and physical infrastructure within the National Park.

Contributions will always be sought, via a 106 agreement, for affordable housing and also possibly, as an example for the following which is not an exhaustive list: Mitigation and enhancement for landscape conservation and biodiversity, sustainable transport initiatives, maintenance or improvements to footpaths, bridleways, cycle ways and car parks; flood alleviation schemes and energy projects.

- 5.38 Strategic Policy Ch was referred in the Authority's pre-application response and relates to new development which has wider community and services impact that may require contributions to social and physical infrastructure within the national park.
- 5.39 Community benefit / planning obligations are in place or may be adopted in relation to large-scale proposals within the nuclear industry. These include the Low-Level Waste Repository (LLWR) in the former county of Cumbria, the Geological Disposal Facility (GDF), and New Nuclear Builds (NNBs). These are programmes of work spanning multiple decades and resulting in much greater impacts than the proposals that are subject to this planning application, which is not related or comparable with such cases. The proposed development essentially comprises a demolition, infill and disposal project of existing redundant assets. The proposals will have limited impact outside the NLS boundary. As such, there is not considered to be a need for community benefit or planning obligations that may otherwise be sought to mitigate the impacts of the development on the local area.



**Strategic Policy D: Natural Environment (D)**

The natural resources, biodiversity, geodiversity and 'Special Qualities' of the Snowdonia National Park will be protected from inappropriate development. Where development is deemed acceptable developers will be expected to ensure that the natural environment is protected and enhanced.

Proposals should not adversely affect the National Park's biodiversity resources including designated sites from an international through to a local level, as well as wider biodiversity resources e.g. habitats and species outside designated sites.

Development proposals which are likely to adversely affect the integrity of European designated sites (either alone or in combination with other plans or projects) will not be permitted unless the requirements of the Conservation of Habitats and Species Regulations 2010 have been fulfilled and hence the following criteria can be met:

- i. There is no alternative solution.
  - ii. There are imperative reasons of over-riding public interest for the development.
- The following requirements will apply to development affecting nationally and locally designated sites:
- iii. The location, design and construction of the development is such that damage to nature conservation features are mitigated, and opportunities for nature conservation gain are taken.
  - iv. Compensatory measures are provided if necessary.
  - v. The remaining nature conservation features are protected and enhanced and provision is made for their management.

Development will only be permitted within the Undeveloped Coast where it can be demonstrated that a coastal location is essential. Development which harms the unspoilt landscape character or wildlife habitats will not be permitted.

Development proposals which are likely to adversely affect habitats and species listed in the Local Biodiversity Action Plan will be subject to the guidelines of the Supplementary Planning Guidance on Local Biodiversity.

- 5.40 Unmitigated, there would be some potential for the proposals to impact ecology predominantly through dust deposition; however, mitigation is proposed which will avoid significant adverse effects occurring via dust. Impacts via ground and surface waters are considered within specific chapters of the Environmental Statement that accompanies the planning application. These matters are discussed in the Environmental Statement and in the following 'Planning Issues' section of this Planning Statement.

**Development Policy 2: Development and the Landscape (2)**

The scale and design of new development, including its setting, landscaping and integration should respect and conserve the character, qualities and views of the landscape. Unacceptable impacts on the landscape will be resisted and particular regard will be had to the protection of:

- i. The Snowdonia Dark Skies Reserve, in particular Core Areas.
- ii. The Dyfi Biosphere Reserve.
- iii. Section 3 areas of natural beauty.
- iv. Undeveloped coast.
- v. Panoramas visible from significant viewpoints.
- vi. Sensitive Landscape Character Areas as defined in the Supplementary Planning Guidance documents the Landscapes of Eryri and the Landscape Sensitivity and Capacity Assessment.

- 5.41 This policy relates to development and the landscape and states that development should respect and conserve the character of the landscape, having particular regard to Section 3 of the Wildlife and Countryside Amendment Act 1985, areas of natural beauty, the undeveloped coast, panoramas visible from significant viewpoints, and landscape character areas.
- 5.42 The ponds complex is set at a low elevation in comparison to most of the surrounding area and the buildings and structures comprised within the complex have a relatively low height when compared to those adjacent built elements on the site, such as the reactor buildings, ILW store, former resin solidification plant and the access control building.
- 5.43 Whilst the site is located within the National Park and adjacent to an area of natural beauty, the proposals largely involve the demolition of a series of buildings and structures (collectively measuring approximately 230m long by 20-45m wide) which can only be beneficial to the site's visual baseline. In making the area into a useable operational area for the wider decommissioning of the site, the

proposals will facilitate further decommissioning and consequential reduction of the wider site's visual impact.

- 5.44 The on-site disposal of suitable waste will take place below-ground, with only the concrete cap over the ponds complex being visible. As detailed further in section 6, the proposals will not cause demonstrable harm to the visual or landscape amenity of the site or surrounding area, meeting the requirements of Development Policy 2.

**Strategic Policy F: Waste (F) – Allocation of Land**

No land will be allocated for the development of new regional, or sub-regional, scale waste management facilities.

Applications for new large-scale waste management facilities intended to meet regional or subregional needs will not be permitted.

- 5.45 This policy relates to waste, but only states that development of large regional or sub-regional waste facilities will not be permitted. The proposed development is not for a regional or even sub-regional waste management facility. Whilst suitable lightly contaminated radioactive waste is proposed to be disposed of on-site, this accords with NDA strategy, is highly regulated by NRW under separate legislation and brings environmental benefits from not having to export large quantities of waste off-site. The proposals do not, therefore, conflict with Strategic Policy F.

**Development Policy 4: Small-scale sites for household and inert waste (4)**

Applications for planning permission for small-scale waste recycling on industrial sites and for the management and disposal of locally generated domestic and inert waste, will be considered favourably, provided that there are no adverse environmental impacts or that these can be satisfactorily mitigated.

Applicants will be required in all cases to submit a Waste Planning Assessment.

- 5.46 This policy relates to small scale waste facilities for the management and disposal of locally generated inert waste. The proposed development will generate demolition arisings, mainly concrete and masonry, some of which may be classed as inert and which will be retained on-site and processed to create a 'product' that can be used as a sub-base for the concrete cap. As such it could be considered that part of the development proposal is a small scale, but clearly ancillary, waste recovery or recycling facility. The potential adverse effects of the associated activities (principally concrete crushing) are considered in the Environmental Statement and this Planning Statement and can be satisfactorily mitigated and as such this activity is supported by Development Policy 4. A Waste Planning Assessment is included at Appendix VII.

**Strategic Policy Ff: Historic Environment (Ff)**

The historic landscape, heritage assets and cultural heritage of Snowdonia National Park will be conserved and enhanced, due to their contribution to the character and 'Special Qualities' of the National Park. Particular protection will be given to the following archaeological, architectural, historic or cultural assets and where appropriate, their settings.

Development will not be permitted that will adversely affect in any way the following Heritage Assets, or where appropriate their settings and significant views:

- i. Conservation Areas
- ii. World Heritage Sites
- iii. Candidate World Heritage Sites
- iv. Scheduled Monuments and other sites of archaeological importance
- v. Historic landscapes, parks and gardens
- vi. Listed Buildings
- vii. Traditional Buildings

- 5.47 Strategic Policy F(f) protects the heritage assets and cultural heritage of the National Park. Within the wider NLS boundary is the Grade II\* Registered Historic Park and Garden, Former Nuclear Power Station at Trawsfynydd, which comprises two gardens: Dragon Garden and Dame Sylvia Crowe Garden. The site is also encompassed by the 'essential setting' for the Former Nuclear Power Station at Trawsfynydd and is located within a Registered Historic Landscape, the Trawsfynydd Basin and Cwm Prysor. There are also four listed buildings and three Scheduled Ancient Monuments (SAMs) within 1km of the NLS. It is not considered that the ponds complex contributes positively to the setting of the identified historic assets and, therefore, its demolition and construction of a concrete cap will not be detrimental to the historic environment. The proposals, therefore, accord with the requirements of Strategic Policy F(f).

**Development Policy 18: The Welsh Language and the Social and Cultural Fabric of Communities (18)**

In determining all planning applications within the National Park the needs and interests of the Welsh Language will be taken into account. This will be achieved through:

- i. Supporting development which maintains or enhances the integrity of the Welsh language.
- ii. Refusing development which, due to its size, scale or its location, would cause significant harm to the character and language balance of a community. To be able to make an informed decision on applications that may have an effect on the future of the Welsh language within communities, applicants will be required to submit a:
  - a) 'Community and Linguistic Statement' to accompany a planning application for unanticipated windfall sites of 5 or more residential units; a commercial, industrial or tourist development with an area of 1000m<sup>2</sup> or more; a development which is likely to lead to the loss of community facilities or employment opportunities and a tourism development creating ten or more holiday units.
  - b) More detailed assessment in the form of a 'Community and Linguistic Impact Assessment' to accompany a planning application where developments are on a larger scale. Larger developments in this case are regarded as proposals which are substantially above the thresholds outlined in criterion (a) and are likely to be located on unallocated sites, have some significance beyond the National Park boundary and be unrelated to specific policies in the Plan.
- iii. Mitigating against any adverse effect through requiring, in appropriate circumstances a financial contribution through a Section 106 agreement.
- iv. Encouraging all signage by public bodies and by commercial and business companies to be bilingual or in Welsh only to protect and promote the distinctive cultural amenity of the National Park.
- v. Encouraging the use of Welsh place names for new developments, house and street names.

- 5.48 This policy requires applications that may have an effect on the future of the Welsh language to be supported by a Community and Linguistic Statement or a Community and Linguistic Impact Assessment, depending on the particular development proposed. The proposed development could be considered an industrial development and, since the concrete cap would measure more than 1000m<sup>2</sup>, a Community and Linguistic Statement (Document Reference: AY/17C1000085/CLS/01) has been prepared and supports this application in accordance with this policy. Further information is provided in the 'Planning Issues' section of this statement to address the impact of the proposals on the linguistic character of the surrounding area.

**Development Policy 27: Snowdonia Enterprise Zone**

A landscape led outline Masterplan will need to be produced for both Llanbedr and Trawsfynydd sites and agreed with the Authority. The Masterplan will contain a development brief, a design statement, and a schedule identifying the phasing of development and associated infrastructure improvements required for each stage, before any development commences. The outline masterplan will need to be supported by a landscape and visual impact assessment and demonstrate how the siting, scale, design and character of the development will minimise adverse effects upon the landscape character, visual amenity, natural environment and cultural heritage of the Park.

Part A - Proposals for development in line with Parts B and C of this policy will be supported within the Snowdonia Enterprise Zone provided the following criteria are met:

- i. The design is coherent and of high standard responds positively to the sensitive landscape and visual setting and Special Qualities of the National Park.
- ii. The siting, height, form and scale materials and use of colour within the development assists its landscape integration and minimises significant adverse effects upon the landscape character and visual amenity.
- iii. Development proposals have been considered in view of the requirements of the Habitats Regulations and found to be compliant.
- iv. Development on either site is in line with an agreed outline masterplan for that site.
- v. The employment development maximises the use of the existing local workforce.
- vi. Development on either site does not have and unacceptable impact on the dark skies reserve.

Part C (Trawsfynydd) - Within or immediately adjacent to the Snowdonia Enterprise Zone allocation at Trawsfynydd, the following uses will be accepted:

- works and uses associated with nuclear decommissioning;
- new uses including B1, B2, B8 and other uses associated with digital/ICT businesses;
- low carbon energy businesses and energy generation technologies;
- Research and Development (related to ICT, Energy & Environmental sectors), and;
- employment-related training and education purposes.

- 5.49 This policy relates to Llanbedr airfield and Trawsfynydd NLS. The ELDP outlines three short-term priorities for the Welsh Government defined Snowdonia Enterprise Zone (SEZ), as follows:
1. Developing the local and regional supply chain to support the future of the site and improve Meirionydd's economic prospects.
  2. Agreeing a preferred option(s) for the development of the sites, outlining necessary infrastructure requirements and options for creating sustainable employment opportunities.
  3. Influencing the decommissioning programme and timetable to maintain employment on the Trawsfynydd site.
- 5.50 The policy is split into three parts (A, B & C). Part A includes criteria against which development proposals at Llanbedr (Part B) and Trawsfynydd (Part C) will need to be considered. Part A applies to all development in the SEZ and the requirements are set out in the policy above. All of these Part A criteria, insofar as they apply to the proposed development, are met. A shadow Habitats Risks Assessment has been submitted with the planning application, which shows no significant adverse effects on designated sites.
- 5.51 The Part C requirements are also set out above and Part C criteria, insofar as they apply to the proposed development, are met.
- 5.52 In addition, paragraph 6.25 of the ELDP states: *"The policy supports the on-going decommissioning and remediation process at Trawsfynydd – a process governed by national strategies which are subject to regular review and consultation and recognised as a material consideration in planning decisions. Any works associated with decommissioning and radioactive waste management at the site will be supported by the Authority subject to compliance with the policies of the ELDP."*
- 5.53 Development Policy 27 supports works and uses associated with nuclear decommissioning which clearly needs to be progressed to enable the future uses defined within this policy to come to fruition. The proposals are, therefore, compliant with this policy.

## Supplementary Planning Guidance (SPG)

- 5.54 The Authority provides a range of Supplementary Planning Guidance (SPG) which comprises detailed guidance on the way in which policies of the ELDP will be applied in particular circumstances or areas. The following SPGs have some relevance to the application.
- **Supplementary Planning Guidance 2 - General Development Considerations (September 2011)**  
This SPG builds on Development Policy 1 (General Development Principles) of the LDP to assist with the determination of development proposals, which should have regard to matters such as the scale, design, impact on protected species, the landscape and neighbours.
  - **Joint Supplementary Planning Guidance 12 - Enabling Sustainable Development in the Welsh National Parks (May 2015)**  
This Joint SPG aims to help planning applicants understand what sustainable development means in the Welsh Parks. It explains the type and location of developments that are likely to be acceptable in the Parks and the main principles against which applications are judged. The SPG identifies the fundamental planning considerations common to all development types in the Welsh National Parks, sets out planning considerations that apply to particular types of development in the Welsh National Parks, and contains links to all the policy documents of direct relevance to planning sustainable developments.
- 5.55 The matters covered under these SPG documents are considered in the following section of this statement.

## 6. Planning Issues

- 6.1 As required by Section 38(6) of the Planning and Compulsory Purchase Act 2004 the application proposals have been assessed against all relevant national and development plan policies and other material considerations, and have been found to be in compliance.
- 6.2 To expand upon this, the following topics are now individually discussed:
- The Principle of Development
  - Residential Amenity (Noise & Vibration, Air Quality and Dust)
  - Visual Amenity, Landscape & Heritage
  - Traffic & Transportation
  - Flood Risk & Drainage
  - Ecology
  - Ground and Surface Water & Land Contamination (Works Phase)
  - Long-Term Impacts
  - Impact upon the Welsh Language
  - Socio-Economic & Cultural
  - Environmental Permit Application Considerations

### The Principle of Development

- 6.3 The decommissioning of Trawsfynydd is an inevitable and important process controlled by various pieces of legislation outside of the planning process' remit. The demolition of the ponds complex is required in connection with the decommissioning process, which is acknowledged as being necessary by ENPA in the adopted ELDP.
- 6.4 ELDP Policy 27 (Snowdonia Enterprise Zone) relates to the Trawsfynydd NLS. This is split into three parts. Part C (Trawsfynydd) supports specific development within or immediately adjacent to the Snowdonia Enterprise Zone allocation at Trawsfynydd and specifically includes works and uses associated with nuclear decommissioning. In addition, national planning policy is supportive of the proposals since the primary objective of Planning Policy Wales (PPW) (Edition 12) is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015 and the Well-being of Future Generations (Wales) Act 2015. The decommissioning of the NLS clearly needs to be progressed to enable the future uses defined within ELDP Policy 27 to come to fruition.
- 6.5 Given the unordinary nature of the proposals for on-site disposal, the ELDP does not make any specific provision for radioactive waste disposal. At a national level, PPW does not preclude the on-site disposal of radioactive waste, although it does seek to protect the special character of National Parks. TAN 21 does not preclude waste development within the National Park but requires that they are appropriately designed.
- 6.6 The disposal of wastes will be below-ground, and it does not involve the construction of an 'installation' for such purposes. The only permanent construction would be that of the protective and unobtrusive concrete cap. Furthermore, due to the required environmental permit change, the proposed disposals can only proceed provided that:
- NRW accept that on-site disposal is overall preferable to the off-site disposal of the wastes concerned in safety, environmental and cost impacts terms (i.e. taking into account all relevant factors);
  - NRW consider that the disposals would be carried out in an optimised manner;
  - All potential adverse impacts on controlled waters (groundwater and surface waters) and, via contaminant transport in the environment, all adverse impacts on people and non-human biota are acceptable with respect to pre-defined criteria;

- All doses to persons inadvertently intruding into the disposals (should that occur after surrender of the site permit), and similarly all doses deriving from any use of excavated materials following such an intrusion, are acceptable with respect to pre-defined criteria;
- All doses to future site occupants are acceptable; and
- All radiological impacts have been minimised and as low as reasonably achievable.

6.7 Therefore, providing that an environmental permit variation is granted, the impacts of disposing waste on-site on people and the environment are considered to be demonstrably acceptable.

6.8 The text included under the subheading 'The Rationale for the Proposals' (Section 3 of this Statement) explains the principal arguments for these proposals in preference to alternative options, though much greater detail is provided in the 'Project and its Alternatives' chapter of the Environmental Statement.

## **Residential Amenity (Noise & Vibration, Air Quality and Dust)**

### Noise & Vibration

6.9 Significant noise and vibration impact due to increased road traffic is not anticipated due to the low number of Heavy Goods Vehicle (HGV) movements associated with the proposals. However, the proposed development has the potential to result in noticeable off-site noise (but not off-site vibration) during the demolition of the ponds complex and associated tasks. The generation of demolition and construction noise during all these activities has been assessed based on current, bounding assumptions as to how the works would be undertaken<sup>8</sup>. The results are presented in the noise and vibration chapter (Chapter 6) of the Environmental Statement. The noise assessment methodology was agreed with the relevant Environmental Health Officers of Gwynedd Council.

6.10 The closest sensitive noise receptor in the vicinity of the site is the farm at Ty Gwyn (0.5 km northeast of the application site); this has been determined to have 'medium' receptor sensitivity. Baseline noise levels at this location are consistent with the rural setting. The noise assessment indicates the maximum predicted noise level at Ty Gwyn Farm will be between 48 to 56 dB (LAeq,T). Whilst the increase in noise levels are generally above existing ambient noise levels and would likely be audible, the impact has been assessed as low magnitude during all activities which are not significant. In the main, the works are restricted to daytime hours (including Saturday mornings) as explained in the Environmental Statement and the Construction and Demolition Environmental Management Plan. there is potential that some limited night-time works could be required, for example manual surface finishing following the concrete pours for the cap. However, the noise emissions associated with any night-time works are considered likely to be lower than those considered for day-time activities, due to the relatively minimal plant requirements. Therefore, these works would not result in significant undue noise disturbance. The noise assessment has taken a 'worst case approach' and therefore does not take into account that some of the noise-generating activities will be within buildings, and it has not taken into account the noise-shielding effect of the large buildings around the ponds complex (including the reactor buildings).

6.11 Note that there will not be any other unrelated works on the wider site taking place at the same time as the ponds complex project that could alter the background noise levels from those recorded to-date or combine to increase total noise levels arising from the site. In particular, the reduction in the height of the reactor buildings that was granted planning permission (Reference: APP/H9504/X/02/514892) in 2003 will be complete prior to the ponds complex project commencing.

6.12 The proposed development itself will not create any noise after the works are complete.

6.13 In summary, the proposed development will not result in unacceptable levels of noise and vibration that may otherwise harm the amenity of identified noise sensitive receptors. The proposals, therefore, comply with the requirements of ELDP Development Policy 1: General Development Principles and TAN 5 (Noise).

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<sup>8</sup> A contractor for these works has not yet been appointed, and therefore the contractor's chosen working methods may differ from those assumed in the noise assessment. However, it is highly unlikely that the noise levels would be any greater than those estimated.



### Air Quality & Dust

- 6.14 The site is not located within an Air Quality Management Area and there are none within the county of Gwynedd. Expected vehicle numbers associated with the proposed development are also relatively low. Traffic movements associated with the proposed works are anticipated to include maximum one-way daily HGV movements of 13 and maximum one-way daily car and van movements of 19. As explained in the scoping report submitted by the Applicant, such vehicle numbers are far below the threshold to undertake a detailed air quality assessment with respect to road traffic emissions.
- 6.15 Nevertheless, the proposed development works area has the potential to give rise to direct dust and fine particle emissions, though these will be limited to the works phase. Work with the potential to raise dust include demolition, demolition arisings processing and stockpiling, emplacement of infill (if not done within an enclosure), capping and drainage construction activities, and related on-site vehicle movements that could cause track-out of material. Various mitigation measures are proposed in the Construction and Demolition Environmental Management Plan submitted with the planning application, including the use of water sprays to dampen down any airborne dust. Note that there will be no uncontrolled emissions of radioactive dust from the licensed site.
- 6.16 The Institute of Air Quality Management guidance<sup>9</sup> states that a detailed dust assessment is required where there is a 'human receptor' located within 250m from the site or, up to 250m from the site entrance, within 50m of the public highway routes used by works vehicles. These criteria are not met.
- 6.17 The matters of air quality and dust were, for the most part, therefore scoped out of the EIA. However, in relation to dust impact on ecology relatively close to the Application Site, e.g. broadleaf woodland, this is addressed in the EIA and is discussed in the ecology section later in this Planning Statement. In summary, with mitigation, no significant effects on ecology are expected.
- 6.18 The towns or villages located next to the A470, A487 and A496, which are anticipated to be the primary routes to access the Application Site, could in theory be impacted due to dust from vehicles depending on their loads, but mitigation measures that may include on-site road cleaning, wheel washing for vehicles leaving the site, and covering dusty loads, are proposed. Therefore, no effects are anticipated along these routes. Note that the section of the A470 through Ffestiniog will not be used.
- 6.19 Dust monitoring is normally carried out at Trawsfynydd when demolition works are being undertaken, for example the demolition of the Administration building and workshop in 2016, and this will be the case for this development too, as explained in the Construction and Demolition Environmental Management Plan submitted with the planning application.
- 6.20 In summary, the mitigated effects of pollutant emissions and dust from the works vehicles on both human and ecological receptors (discussed further under the ecology section) are not considered to cause an unacceptable adverse impact or significant adverse harm. The proposals are, therefore, in accordance with Development Policy 1 (General Development Principles) and Strategic Policy D (Natural Environment) of the ELDP.

## **Visual Amenity, Landscape & Heritage**

### Visual & Landscape Assessment & Strategy

- 6.21 The Application Site relates to the ponds complex, which is a complex of mainly contiguous buildings screened by the two reactor buildings.
- 6.22 The wider NLS and the ponds complex are sited at a low elevation in comparison with most of the surrounding area. The most important topographical feature influencing the availability of views of the ponds complex is Craig Gyfynys; a rounded 270m high hill located circa 800m to the west. The screening provided by topography is supplemented in some locations by some extensive tree cover.
- 6.23 There are a variety of recreational receptors with potential views of the Application Site, including those using the limited Public Rights of Way network that is concentrated on the eastern side of Llyn

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<sup>9</sup> IAQM Guidance on the assessment of dust from demolition and construction (January 2024)



Trawsfynydd. Of more relevance to the ponds complex is National Cycle Route (NCR) 82 routed along the western and southern boundary of the NLS and which lies within 100m of the ponds complex along its closest section, although this section is routed through woodland. This ensures that any views not screened by the intervening Intermediate Level Waste (ILW) Store are, at least partly, filtered as well as being seen in the visual context of the ILW Store, the reactor buildings and sometimes with car parks and other lower level, built development on the NLS.

- 6.24 A Visual Baseline Appraisal was prepared in March 2021 which assessed in more detail six viewpoints looking towards the Application Site (Appendix V). The associated analysis of these viewpoints concluded that the ponds complex has a negligible visual role in even the closest views available of the western side of the NLS such as from NCR 82 or the elevated, open access area on Craig Gyfynys. This considers the tree removal work that was undertaken under a felling licence approximately 2 years ago that cleared a section of conifer plantation (mainly Sitka Spruce) located to the north-west of the ponds complex. Native broadleaf species have been since been replanted in this position. The ponds complex is not visible in views from locations at greater separation distances, including the most open publicly accessible views on, or close to, the eastern and southern shorelines of Llyn Trawsfynydd. The absence of views is due to the ponds complex having a low height and being located adjacent to larger and taller built elements, primarily the two reactor buildings (which, even when reduced in height, will remain visually dominant in comparison). In some views, for example from the south-east and south, additional screening of the south-eastern end of the ponds complex is provided by the mature tree cover.
- 6.25 Considering this, the proposed development does not have the potential to give rise to any significant landscape or visual effects and was, therefore, been excluded from the scope of the EIA. Since it is proposed to demolish this complex of buildings and structures, replacing them with a concrete cap of minimal protrusion, the impact on the visual amenity of the surrounding area will not be demonstrably harmful and could, in fact, represent betterment. The proposals therefore comply with Development Policies 1 (General Development Principles) and 2 (Development and the Landscape) and Strategic Policy D (Natural Environment) of the ELDP.

#### Heritage

- 6.26 The Historic Environment (Wales) Act 2016 made a number of amendments to the Town and Country Planning Act 1990 and provides the legislative framework for the protection and sustainable management of the historic environment in Wales. Section 16(2) and Section 66(1) of The Town and Country Planning (Listed Building and Conservation Areas) Act 1990 place a statutory duty on Councils to have regard to the desirability of preserving a listed building or its setting or any features of architectural or historic interest which the building possesses when considering applications for listed building consent and planning permission. At a local level, Strategic Policy F(f) of the ELDP protects the heritage assets and cultural heritage of the National Park.
- 6.27 There are no statutory or non-statutory designated historic assets within the Application Site boundary. However, the wider NLS boundary includes a Grade II\* Registered Historic Park and Garden, Former Nuclear Power Station at Trawsfynydd (Reference PGW(Gd)64(GWY), which comprises two gardens: Dragon Garden and Dame Sylvia Crowe Garden. The ponds complex is minimally visible from within Dragon Square, but it lies opposite the Dame Sylvia Crowe Garden at its southern end. Both gardens fall within the Nuclear Site Licence (NSL) boundary and neither is accessible to the public. In any case, removal of the ponds complex will provide an improvement in the settings once complete.
- 6.28 The site is also located within a Registered Historic Landscape, the Trawsfynydd Basin and Cwm Prysor. There are also three listed buildings and three Scheduled Ancient Monuments (SAMs) within 1km of the NLS.
- 6.29 The EIA Scoping Report assessed the potential for direct and indirect significant effects to historic assets and their essential setting. This concluded the ponds complex does not contribute to the setting of the identified historic assets and, therefore, its demolition and construction of a concrete cap over the infilled below-ground voids will not be detrimental to the historic environment. The primary reason for this is the lack of views of the development area from viewpoints off site, and the fact that the development is predominantly concerned with the removal of a complex of buildings. On this basis, it

is not considered that the proposed development has the potential to give rise to any significant historic environmental effects and this topic has therefore been excluded from the scope of the EIA.

- 6.30 In terms of the potential for features of archaeological importance, the Trawsfynydd site is highly developed and disturbed, with no potential for intact historical or archaeological features remaining.
- 6.31 In view of the nature of the proposals and the lack of views into the development area, the proposals accord with the requirements of ELDP Strategic Policy F(f), Section 16(2) and Section 66(1) of The Town and Country Planning (Listed Building and Conservation Areas) Act 1990, The Historic Environment (Wales) Act 2016, and TAN 24 (Historic Environment).

### **Traffic & Transportation**

- 6.32 The existing vehicle access to the NLS is via Power Station Access Road, which is a 400m long private road linking to the A470 at a standard priority junction with right turn and taper lanes (diverging and merging) which are wide enough to accommodate HGVs. There are no changes proposed to this access.
- 6.33 The proposals will require capping material and potentially some aggregate material to be imported to site. This material will be sourced from local quarries. Transport movements will also be generated by the need for plant, equipment and additional personnel. The number of contractors to be employed on the project is between 20 and 25, which is well within the normal variation of personnel on the site. These additional personnel will, therefore, not generate significant additional traffic movements or demand for parking; the latter can be accommodated using the existing on-site car parks.
- 6.34 At worst-case, the delivery of import infill material (if required) would generate a short-lived maximum of 26 HGV trips (13 inward and 13 outbound vehicle trips) per weekday. For the remaining weeks, the daily predicted numbers of HGVs are much lower.
- 6.35 The primary roads to be used are expected to be the A470 (north and south from the site), the A487 north-west of Gellilydan, and the A496 towards Blaenau Ffestiniog. The A470 towards and into Blaenau Ffestiniog would not be used by HGVs, and nor would the A4212 be used by HGVs.
- 6.36 Guidelines for the Environmental Assessment of Road Traffic (GEART) supplied by the Institute of Environmental Assessment (1993) predict traffic flow increases below 10% (taking into account traffic associated with the application proposals) are generally not considered to be significant as daily variations in background traffic flow may fluctuate by this amount. An additional 26 HGV trips per day (two-way total) would be an increase of at most about 13% on the roads referred to above. Changes in traffic flows below this level are assumed not to result in significant environmental effects<sup>10</sup>. There are no operational difficulties on road and at junctions in the area, and there is no reason to suppose that a temporary increase in traffic would have any effect on accident occurrence. Therefore, this subject matter was scoped out of the EIA.
- 6.37 Overall, given the quality of the main routes that will be used and the change in predicted traffic flows to the site (which would be short-lived), the development will not result in a significant uplift in vehicular trips and will not harm the capacity of the local highway network. The proposals, therefore, comply with Development Policy 1 (General Development Principles) of the ELDP and TAN 18 (Transport).

### **Flood Risk & Drainage**

- 6.38 NRW's Flood Map for Planning shows that the risk to the area from fluvial sources is very low and there is no risk from tidal/coastal sources. The risk of flooding from sewer surcharging is very low as any flows from surcharging from minor systems associated with existing nearby buildings would be expected to be minimal/intercepted by the surface water drainage system. The proposed development is potentially at risk should the dams retaining Llyn Trawsfynydd. However, failure of the dams in a manner that could result in flooding of the development area is considered to be an extremely unlikely

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<sup>10</sup> The scoping report estimated that the project, if carried out in 2024, would result in less than 3% change in total traffic and less than 30% change in HGV traffic at the peak. However, the project is now scheduled for a later date and traffic growth will therefore reduce these percentages.

event taking account of the existing inspection/maintenance regime which, combined with a very high lake water levels event.

- 6.39 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.
- 6.40 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 SuDS Approving 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.

## Ecology

- 6.41 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.
- 6.42 The habitat actually 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.
- 6.43 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.
- 6.44 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 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 if required, and sheeting of vehicles carrying potentially dusty loads.
- 6.45 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.

### Biodiversity Enhancement

- 6.46 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 enhance biodiversity specifically in relation to the proposals for demolition and disposal of the Ponds Complex.
- 6.47 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.
- 6.48 In addition, but outside the scope of these proposals, discussion is on-going with ENPA regarding the development of a holistic Biodiversity Enhancement Strategy applicable to the wider Trawsfynydd Site that will outline habitat retention, creation and management practices to be undertaken to improve the biodiversity value of an off-site enhancement area in relation to all future development proposals requiring planning permission at the Trawsfynydd Site. The holistic Biodiversity Enhancement Strategy will designate an area of land for enhancement purposes in close proximity to the Nuclear Licensed Site boundary on land owned by the NDA and, therefore, in control of the applicant.

### **Groundwater and Surface Water & Land Contamination (Works Phase)**

- 6.49 The site hydrogeology and contaminated land status have been under investigation and analysis almost continuously since the mid-1990s. There are many boreholes on site, a significant number of which are monitored for groundwater level, radioactive and non-radioactive contaminants and pH. Some have been subject to high frequency time-series monitoring of groundwater levels, including to provide information to support the present proposals.
- 6.50 As explained in the Construction and Demolition Environmental Management Plan submitted with the planning application, additional monitoring will be undertaken during the proposed works, including using high frequency telemetry equipment to be installed for this purpose in existing boreholes and site drainage systems. This monitoring is designed to detect chemical spills (e.g. diesel spills) if this were to occur during the works, and to detect any increase in ground or surface water turbidity or alkalinity. The Construction and Demolition Environmental Management Plan also includes measures designed to prevent or minimise the occurrence of spills or other processes that could affect ground and surface water in these ways.
- 6.51 The baseline environmental characteristics of the Application Site have been defined following the assessment of various reports, including site-wide hydrogeological interpretation, land quality risk assessment, and on-going groundwater and surface water monitoring. The most recent contaminated land risk assessment for the site was issued in 2021 (by the then Golder Associates) and the latest hydrogeological interpretation (undertaken by WSP Ltd consultants) was issued in 2023 to support the environmental permit application for this proposed development, submitted in December 2023.
- 6.52 Radioactively contaminated ground has been identified within the Application Site boundary, predominantly caesium-137 and strontium-90 originating from storing irradiated fuel in the cooling

ponds, which were subject to leakage to ground mainly in the 1970s and early 1980s<sup>11</sup>. Contaminated groundwater from this area is largely directed to the diversion culvert system via engineered drains, from where it is pumped for authorised (permitted) discharge to the lake. This arrangement will continue for the foreseeable future and will not be changed as part of the proposed development. There is a theoretical possibility that during the works, radioactive discharges to the lake via this system, originating from radioactively contaminated ground near the ponds, could temporarily increase if rainwater ingress to the ground were to increase. Routine monitoring of the diversion culvert, required for environmental permit compliance reasons, would detect this, if it were to begin to happen. The site would therefore be able to respond, and radioactive discharge limits will not be exceeded.

## Long-Term Impacts

- 6.53 In environmental permitting terms, the proposals involve the on-site disposal of radioactive wastes and other activities for which it is necessary to assess both radiological and non-radiological impacts on people and the environment as part of the environmental permit application and the planning application EIA.
- 6.54 The ponds complex footprint is the location of most of the proposed on-site disposals of suitable radioactive waste (both by disposal in-situ and by disposal for the purpose of infilling unwanted below-ground voids). Along a substantial portion of its length, the east side of the ponds complex is in contact with radioactively contaminated ground. The radioactively contaminated ground is not itself waste, and it does not need permission from NRW, and does not need planning permission, to be left in-situ. It will, however, be included in future considerations (in several decades' time) prior to NRW agreeing to the surrender of the site's environmental permit.
- 6.55 The receptors of relevance include humans, flora and fauna, surface water courses and groundwater receptors.
- 6.56 The detailed radiological assessments accompanying the environmental permit application submitted to NRW in December 2023 address: "natural evolution" (meaning the gradual degradation of structures and the long-term leaching of pollutants); inadvertent intrusion (by drilling, excavation etc.) including the use of materials removed for use elsewhere; site occupancy (meaning presence of persons for a significant proportion of each year working or living directly above the capped radioactive materials). The detailed non-radiological assessments accompanying the environmental permit application submitted to NRW in December 2023 address "natural evolution" only, there being no requirement to assess the non-radiological impacts of inadvertent intrusion and there being no non-radiological processes equivalent to radiation penetrating through the concrete cap.
- 6.57 The assessed radiological impacts of natural evolution are generally well within the required standards and far below the normal background levels of radiation dose to which people in the UK are exposed. In the hypothetical case of there being an abstraction well, constructed for drinking water purposes relatively close to the proposed on-site disposals and at the time of peak calculated groundwater radionuclide concentrations, doses to the well-drinker are close to the regulatory guidance levels.
- 6.58 In terms of the calculated doses to hypothetical inadvertent intruders, or to persons exposed to radiation as a result of materials excavated by such intrusions and taken away from the site, some of these are close to the regulatory guidance levels for these scenarios. However, these results are based on conservative (i.e. bounding) radiological inventory assumptions for certain ponds complex features that have not yet been specifically characterised. The actual radioactive inventories of these features may be found to be significantly smaller once sufficiently characterised, but in any case, targeted removal of radioactivity is an option that would be adopted if necessary or considered optimum. The calculated site occupancy doses are similar, in that some of these estimated dose rates are close to the regulatory guidance levels, for the same reasons. In this case, though, if necessary then it is straightforward to reduce site occupancy doses through the use of additional shielding concrete in the

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<sup>11</sup> There may have been on-going migration of contaminants from under-ponds "sampling drains" to the ground since that time. However, any such sampling drains are planned to be removed or grouted with the aim of terminating any current migration and/or preventing future potential migration.



cap construction or by removing or relocating the radioactive contamination of particular near surface features.

- 6.59 The primary issue of potential concern in relation to non-radiological long-term impacts of the proposals is the effect of depositing broken and crushed concrete demolition arisings that have the potential to increase groundwater alkalinity in the very long-term. This issue is no different to that which arises for conventional building demolition with similar void infill, such as has already taken place at Trawsfynydd for the turbine hall and the administration/workshop complex. It is also no different to that which arises at any industrial site subject to the demolition of buildings with below-ground voids infilled with demolition arisings, albeit that the environmental consequences are dependent on the local hydrogeological setting. In this case, though it is difficult to quantify, it is argued that the combination of carbonation of concrete (effectively a chemical aging process) and dilution in groundwater will mean that the alkalinity consequences for groundwater are acceptable.

### Impact upon the Welsh Language

- 6.60 TAN 20 (Planning and the Welsh Language) seeks to safeguard and promote the interests of the Welsh language through development proposals and states that:  
*"In determining individual planning applications and appeals where the needs and interests of the Welsh language may be a material consideration decisions must, as with all other planning applications, be based on planning grounds only and be reasonable."* (Paragraph 4.1.2, Page 14, TAN 20).
- 6.61 Development Policy 18 requires a 'Community and Linguistic Statement' to be provided for industrial development with an area of 1000m<sup>2</sup> or more. Since the proposed development could be termed to be an industrial development, such a statement has been prepared and accompanies this planning application (Document Reference: AY/17C1000085/CLS/01).
- 6.62 At a county level, the ELDP recognises that Gwynedd has the highest proportion of Welsh speakers in Wales at 65.4% (2011 Census). This has fallen over the last ten years to 64.4% in 2021 and has in fact gradually declined since the 2001 Census, when 69% of the population could speak Welsh. The submitted Community and Linguistic Statement provides further detail on the linguistic composition at a national, county and local level: in 2021, for the Trawsfynydd ward, the proportion of Welsh speakers was 72.7% and for the working age population was 61%.
- 6.63 The Applicant acknowledges that the proposed development may draw on service providers in the local economy. Particular needs may be for accommodation for temporary workers, potentially for construction materials, and for waste services to process non-radiological materials. Following a review of the available accommodation for workers, 13 suitable hotels and 15 furnished rental properties have been identified within a 20-mile radius of the Trawsfynydd site. For the processing and disposal of non-radiological waste which may arise from the proposed development, a commonly used directory of local services identifies 10 commercial entities which provide waste recycling and management services within 80km (50 miles) of the Trawsfynydd NLS.
- 6.64 The Community and Linguistic Statement has considered the relevant questions included within Appendix A: Community and Linguistic Statement of the National Park's Supplementary Planning Guidance: Planning and the Welsh Language (adopted June 2021). These questions relate to aspects of community life and are derived from best practice guidance set out within Planning and the Welsh Language – the Way Ahead (2005). The assessment of the impact of the proposed development on the Welsh language demonstrates a neutral impact. The development will employ up to 25 contractors, some of which have the potential to be sourced from the local area. However, given the nature of the proposals, there may be a need to source some labour from outside the immediate area. Nevertheless, the development will result in some indirect benefits for locally based businesses that will enhance the local economy and assist with the retention of Welsh speakers in the community.
- 6.65 The Applicant is committed to promoting the Welsh language through the site's operation. It should be noted that Site Stakeholder Group (SSG) meetings are conducted in Welsh as far as possible, and that relevant planning application documentation has been submitted in both Welsh and English. Furthermore, all written communications from the site concerning the present proposals have also

been in both Welsh and English. All stakeholder events concerned with the present proposals have been conducted in Welsh as far as possible.

- 6.66 Overall, the proposals will not have a detrimental impact upon the needs and intensity of the Welsh language and are compliant with PPW, TAN 20, Development Policy 18 of the ELDP and ENPA's Supplementary Planning Guidance: Planning and the Welsh Language (June 2021).

### Socio-Economic & Cultural

- 6.67 The ELDP requires proposals to safeguard and improve the health, safety, economic and social well-being of local communities in order to deliver sustainable development within the park's boundaries. Technical Advice Note 23 (Economic Development) recognises the importance of all aspects of development and that planning decisions are made in a sustainable way which balance social, environmental and economic considerations.
- 6.68 Socio-economic effects have been scoped out of the EIA on the basis the magnitude of impact is expected to be very low. Nevertheless, the key considerations are detailed below:
- **Effects on the population from the additional workers** – The anticipated workforce demand for the proposed development has an approximate maximum requirement for 20-25 individuals and the required workforce deployment will be temporary (for a period of about 24 months). Therefore, it is very unlikely that there will be a significant increase in the local population which would create a problematic increased demand for local services (for example, health services) or cause the relocation of individuals and their families.
  - **Effects on employment markets and opportunities (direct, indirect and induced)** – The anticipated workforce demand for the proposed development has an approximate maximum of 20-25 individuals and the required workforce deployment is temporary (for a period of about 24 months) and very low in number relative to the historical operational workforce (up to 700 individuals in the period 2011-2014) and existing decommissioning workforce (approximately 250-300 persons). Furthermore, the workforce associated with the proposed development accounts for approximately 0.8% of construction industry employees in Gwynedd which is a very small proportion of the capacity of the main sectoral requirement with respect to the delivery of the proposed development. Nevertheless, the proposals will result in indirect and induced employment opportunities, which will support the local economy.
  - **Effects on accommodation** – As indicated above, there are currently approximately 250-300 workers deployed at the Trawsfynydd site to support on-going decommissioning activities. An appreciably larger number (up to 700 workers) were deployed on site in the period 2011 – 2014. Compared to historic and current workforce levels, the temporary deployment of an additional 20-25 individuals to support the delivery of the proposals is not anticipated to lead to substantial impact upon the capacity of local accommodation provision and therefore no significant positive or negative effects are anticipated. Furthermore, there will also be no long-term impacts on the housing stock due to the temporary nature of the proposed development and the associated workforce demand.
  - **Indirect socio-economic effects on local populations and visitors arising from factors such as noise, air quality, and disruption to amenity access** – Residents and visitors are expected to experience only a low level of impact based on the specialist assessments and primarily because activities are contained within the NLS and are additionally temporary in nature. It is also possible that these receptors may expect and prefer decommissioning activities to take place at the Trawsfynydd site rather than experience the lack of activity should the proposed development not take place.
  - **Effects from community and visitor concerns over radioactivity** – The impact on community and visitor concerns over radioactivity with respect to the proposed development has been considered through a standalone Health Impact Assessment (HIA) that supports this application. The proposals do not increase the amount of radioactivity on site from what has been there for decades, and indeed the specifics of the proposals will reduce their potential impacts from what they historically have been, for example through the removal or grouting of under-ponds drains. When any presently above ground contaminated structures are placed below ground to infill voids,

they will either still be above water table or, if not, grouted (turned into concrete blocks). There is, and has been, a significant quantity of radioactively contaminated land in the ponds area and the proposals do not affect this in the long term. There are also two reactor buildings and a large ILW store, both with significant radioactivity inventories. There have also been authorised radioactive discharges to the lake since electricity generation began. It is therefore considered that, in this context and given the regulatory controls over the disposals, there should be no reason for concern, and it is not expected that most local people would be concerned. Indeed, the local appetite for new nuclear build suggests that overall the local community is comfortable with the nuclear industry and everything that that entails.

- 6.69 Taking account of the above, the proposals are considered to comply with the thrust of ELDP Strategic Policy Ch (Social and Physical Infrastructure in new developments) and TAN 23 (Economic Development).

### **Environmental Permit Application Considerations**

- 6.70 Assessment work that has been carried out to support an application for the on-site disposals under the Environmental Permitting Regulations 2016 has been summarised in the EIA and reported in the Environmental Statement that supports this planning application. This includes radiological impacts on people, including from unauthorised intrusion. It also includes non-radiological impacts, e.g. on groundwater.
- 6.71 In order to be granted a permit for the on-site disposals, it will be necessary for NRW to accept, based on the documentation that the Applicant has submitted in the application to NRW, that all the required criteria as set out in the 2018 environment agencies GRR document *"Management of radioactive waste from decommissioning of nuclear sites: Guidance on Requirements for Release from Radioactive Substances Regulation (RSR)"* are met. See Appendix VI.
- 6.72 The main elements of the GRR document are expressed in terms of five principles and fifteen requirements, as shown in Figure 7.



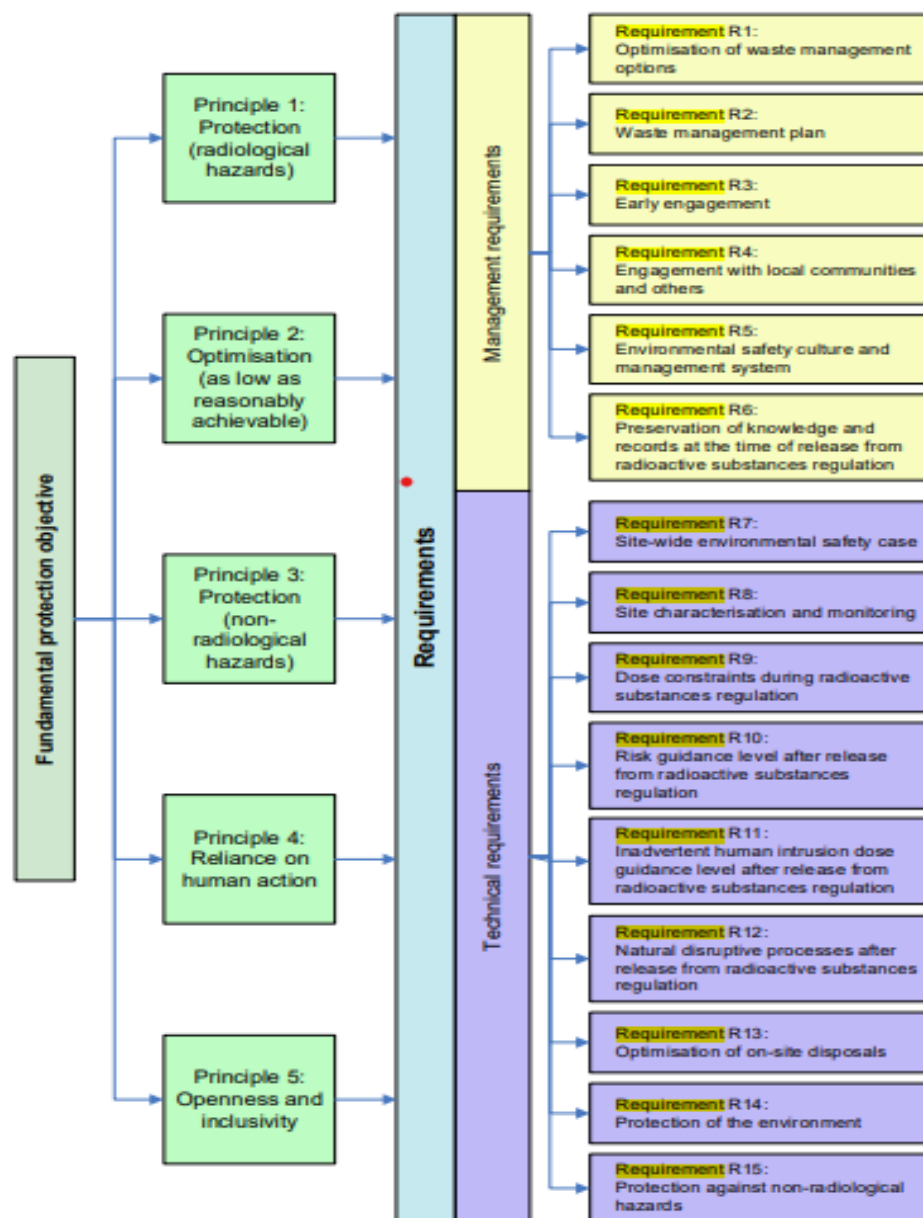


Figure 7: GRR Principles and Requirements2

6.73 Whilst many of the requirements are highly technical in nature and not within the expertise of most local authorities or members of the public, they do include the following elements:

- That the doses and risks from the migration of radioactive contaminants, or from inadvertent (uncontrolled) intrusion, after release of the site from control, or from the use of materials excavated without knowledge of their nature, must be consistent with (i.e. around or better than) the pre-defined dose and risk guidance levels in the GRR (which in turn are based on international radiological protection standards);
- That the non-radiological impacts must be consistent with the standards to be met for non-radioactive waste disposals (including impacts on groundwater, surface waters and designated nature conservation sites);
- That there are proportionate and responsive long-term environmental monitoring arrangements;
- That there are appropriate management arrangements in place, for example to ensure that there are no disposals beyond the limits of what has been permitted, or to respond to unexpected adverse environmental monitoring results; and
- Long-term record keeping arrangements are in place (which in this case, will include storage of all the relevant documentation at the national nuclear archive).

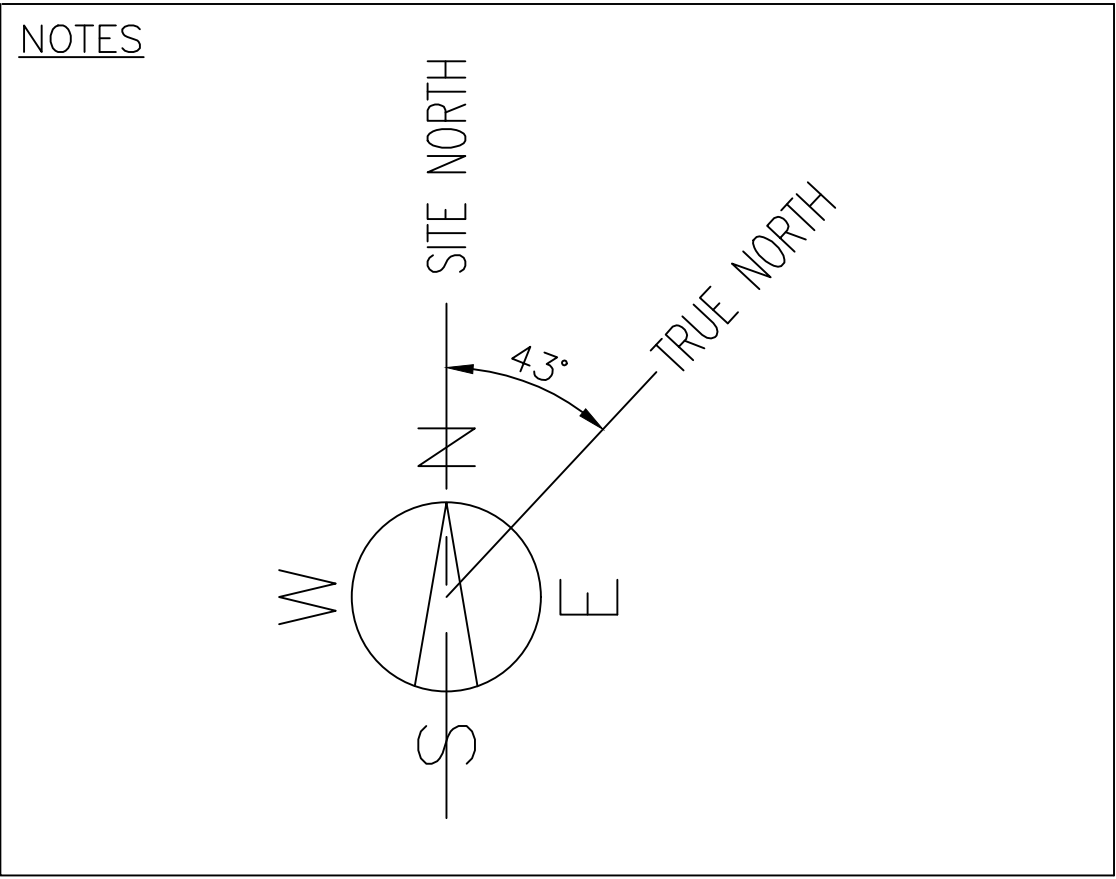
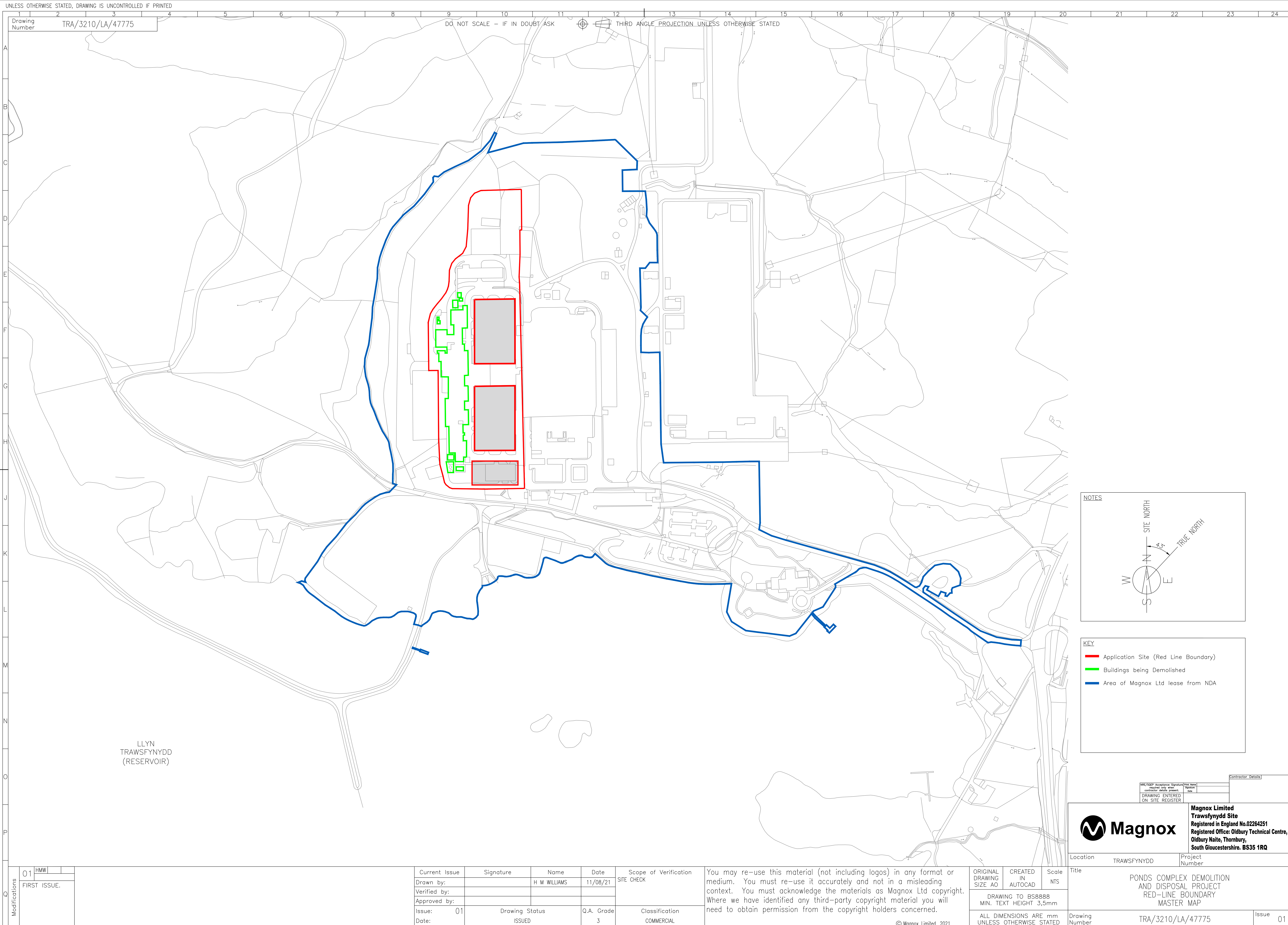
## 7. Summary

- 7.1 This Planning Statement has been prepared to accompany and support a full planning application for the demolition of the Trawsfynydd site ponds complex structures to approximately ground slab level, infilling of its below-ground voids, capping of its footprint, localised modifications to the surface water drainage and the permanent retention of the residual structures and the infill materials, including radioactive waste.
- 7.2 The demolition works constitute a necessary engineering operation that must be undertaken to facilitate the continued decommissioning of the Trawsfynydd Power Station, but also enable the sustainable and safe final management of the associated demolition arisings. Once completed the works would be entirely in keeping with the functional use of the site and current processes being undertaken.
- 7.3 When considered in the context of national planning policy and Strategic Policies A, B, F and Development Policies 2, 4 and 27 of the Eryri Local Development Plan (ELDP), the principle of the proposals is acceptable. Moreover, the Environmental Statement and technical reports that accompany this application demonstrate the proposals are compliant with the relevant policies of the ELDP (Development Policies 1 & 18 and Strategic Policies D, Ch, Ff).
- 7.4 The proposed works will result in long-term betterment for the national park from a visual amenity perspective since they largely involve the demolition of buildings and structures within the confines of the existing Trawsfynydd Power Station site. The provision of a concrete cap over the backfilled voids will constitute a minimal protrusion above ground-level and will have a negligible impact upon the character of the landscape and the integrity of the environment and would assist with future decommissioning efforts since it will form an operational area. Whilst, in environmental permitting terms, the on-site disposal of suitable radioactive waste is proposed, this complies with NDA strategy and will result in benefits to the environment by, amongst other matters, minimising off site transports, reducing worker doses, saving UK tax payer money, and conserving off-site disposal facility capacity.
- 7.5 Overall, the proposed works are appropriate given the context within which they sit and are acceptable in planning terms when considered in context of development plan policy. On this basis, planning permission should be granted.

# **Appendix I**

## Site Location Plan





- KEY
- Application Site (Red Line Boundary)
  - Buildings being Demolished
  - Area of Magnox Ltd lease from NDA

MR/SGP Acceptance Signature	MR/SGP Date
Contractor Signature	Contractor Date
DRAWING ENTERED ON SITE REGISTER	

Contractor Details



**Magnox Limited**  
**Trawsfynydd Site**  
Registered in England No.02264251  
Registered Office: Oldbury Technical Centre,  
Oldbury Haite, Thornbury,  
South Gloucestershire. BS35 1RQ

Location TRAWSFYNYDD Project Number

Title  
PONDS COMPLEX DEMOLITION  
AND DISPOSAL PROJECT  
RED-LINE BOUNDARY  
MASTER MAP

Drawing Number TRA/3210/LA/47775 Issue 01

Modifications	01	HMW
FIRST ISSUE.		

Current Issue	Signature	Name	Date	Scope of Verification
Drawn by:		H M WILLIAMS	11/08/21	SITE CHECK
Verified by:				
Approved by:				
Issue: 01	Drawing Status	Q.A. Grade	Classification	
Date:	ISSUED	3	COMMERCIAL	

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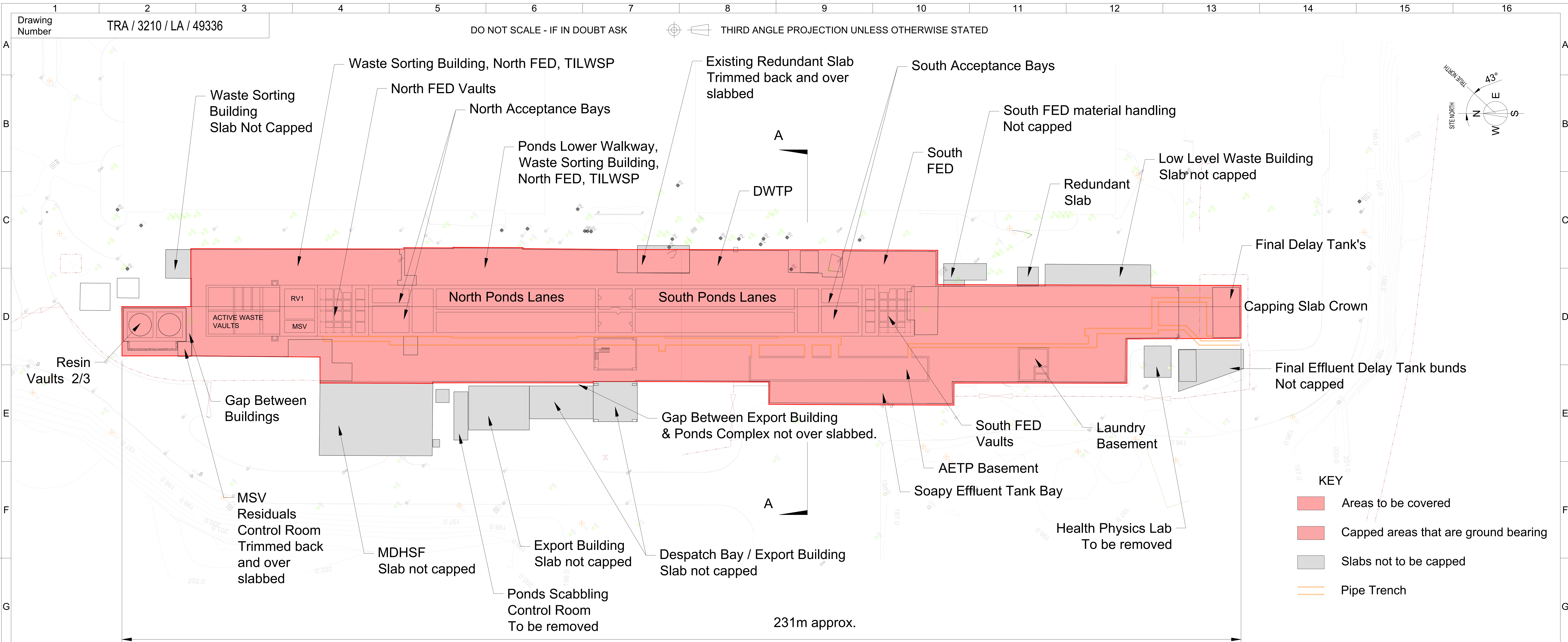
ORIGINAL DRAWING SIZE A0	CREATED IN AUTOCAD	Scale NTS
DRAWING TO BS8888 MIN. TEXT HEIGHT 3.5mm		
ALL DIMENSIONS ARE mm UNLESS OTHERWISE STATED		



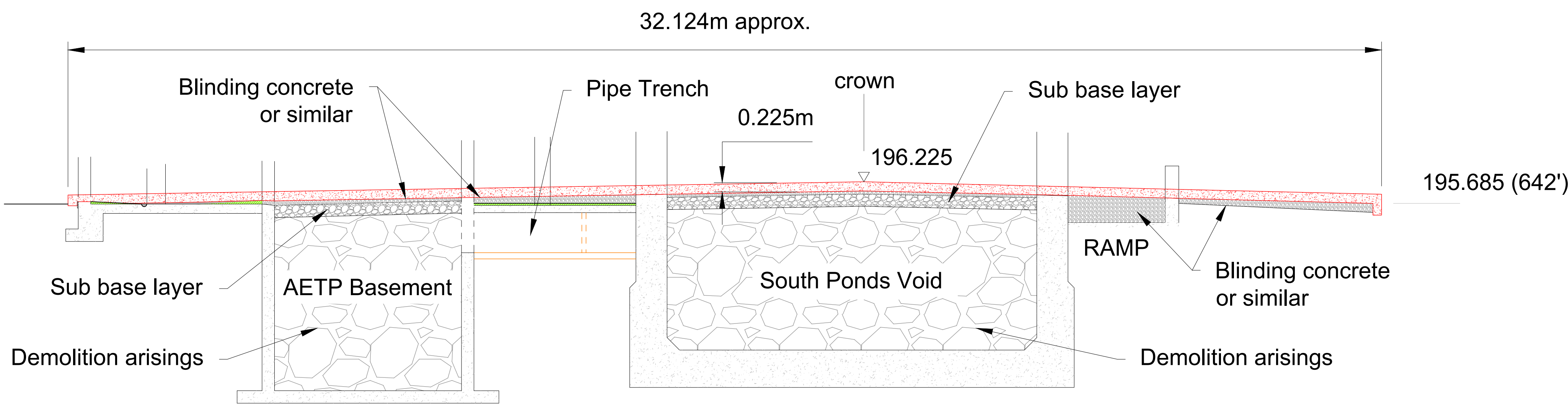
# **Appendix II**

## Site Layout Plan





PLAN ON PROPOSED CAPPING SLAB ON TOP OF EXISTING  
GROUND FLOOR SLABS AND BASEMENT VOIDS  
Scale = 1:2500

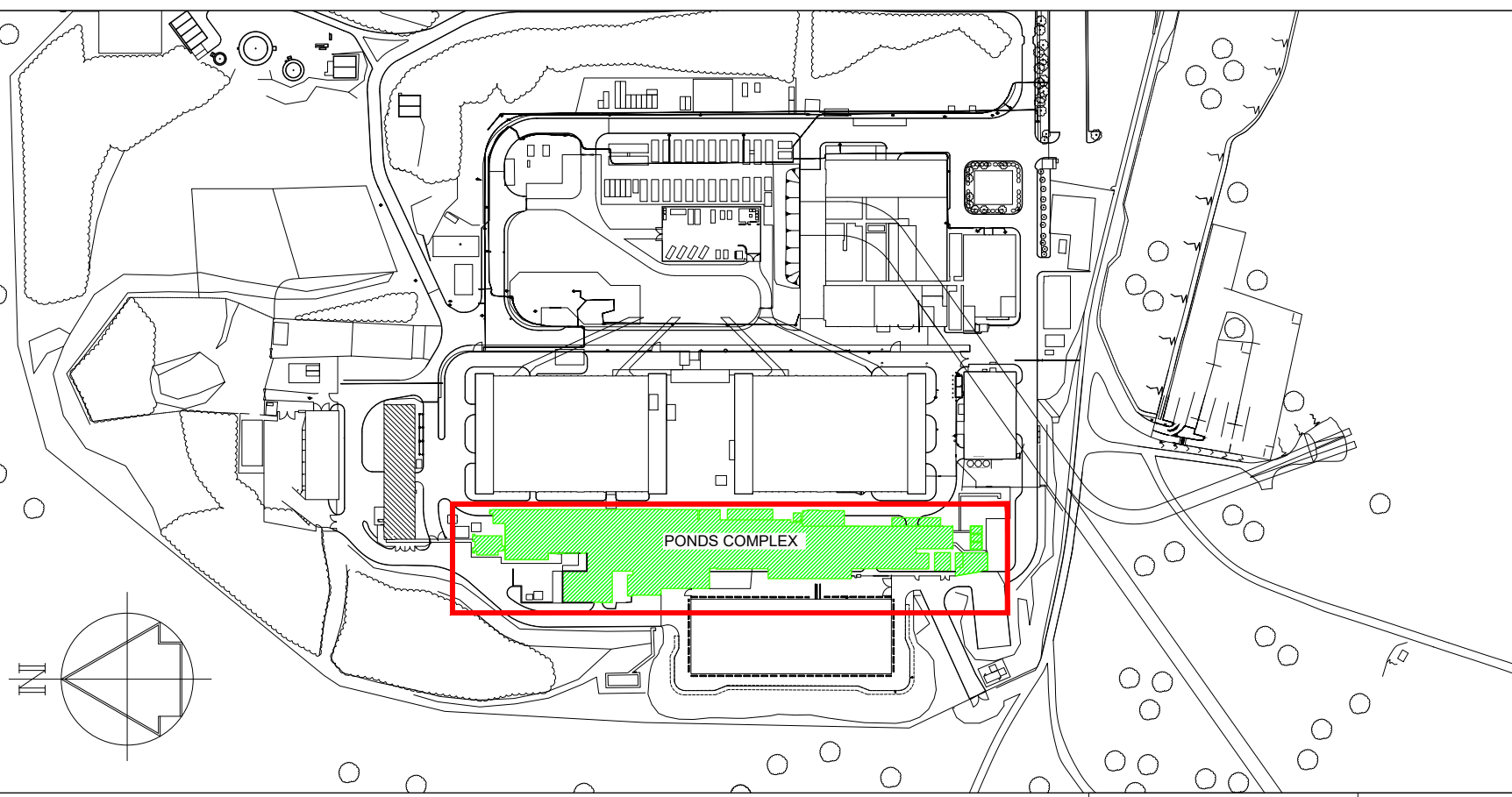


Section A-A  
AETP Basement, Nth Filter Room, Ponds Corridor, Sth FED  
Scale = 1:100

DEFINITIONS

FED	Fuel Element Debris
MDHSF	Magnox Drum Handling and Storage Facility
TILWSP	Transportable Intermediate Level Waste Sorting Plant
DWTP	Decanted Water Treatment Plant
AETP	Active Effluent Treatment Plant
MSV	Main Sludge Vault
RV1	Resin Vault 1

LOCATION PLAN



NRE/SOEP Acceptance Signature required first Name  
Signature  
contractor details present.  
Date  
DRAWING ENTERED  
ON SITE REGISTER



**Magnox Limited**  
**Trawsfynydd Site**  
Registered in England No.02264251  
Registered Office: Oldbury Technical Centre,  
Oldbury Naite, Thornbury,  
South Gloucestershire. BS35 1RQ

Location	TRAWSFYNYDD	Project Number	L28305
Title	PONDS COMPLEX DEMOLITION & DISPOSAL Capping Slab Outline		
Drawing Number	TRA /3210 / LA / 49336		Issue 01

Modifications	01	CWJ	TS	DT
FIRST ISSUE				

Current Issue	Signature	Name	Date	Scope of Verification
Drawn by:	CWJ	CWJ	06/02/2024	FUNCTIONALITY
Verified by:	T Slaven	T Slaven	06/02/2024	
Approved by:	D Thomas	D Thomas	06/02/2024	
Issue: 01		Drawing Status	Q.A. Grade	Classification
Date: Feb 2024		ISSUED	3	OFFICIAL

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2024

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DRAWING TO BS8888 MIN. TEXT HEIGHT 2.5mm		
ALL DIMENSIONS ARE mm UNLESS OTHERWISE STATED		



# **Appendix III**

EIA Screening Opinion (dated 13<sup>th</sup>  
May 2022)

**Andrew Farrow**  
Director of Environment  
Cyfarwyddwr yr Amgylchedd



Ms Angharad Rayner  
Site Director  
Safle Trawsfynydd  
Blaenau Ffestiniog  
Gwynedd  
LL41 4DT

Your Ref / Eich Cyf: 198/SNPA/AR/05650

Our Ref / Ein Cyf: NP5/73/287J

Date / Dyddiad: 13/05/2022

Ask for / Gofynner am: Mr RW Williams

Direct Dial / Rhif Union: 01286 679833

E-mail: [robinwynnewilliams@gwynedd.gov.uk](mailto:robinwynnewilliams@gwynedd.gov.uk)

Dear Ms Rayner

**Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017  
- Regulation 5 Screening Opinion**

**Proposed Demolition & disposal of the Trawsfynydd Ponds complex, disposal of other minor structures, related capping and drainage works, and installation of groundwater monitoring boreholes – Trawsfynydd Nuclear Power Station Decommissioning Site**

Referring to your PA – Ms Delia Taylor's e-mail dated 26 January requesting a formal screening opinion under the Environmental Impact Assessment regulations for the development described above.

Under Regulation 5 and using the assessment criteria set out in Schedule 2 & 3 of the Regulations, it is concluded that the likely impact of the development on the environment **will** require the submission of an Environmental Statement. This screening opinion will be placed upon the Planning Register at the Authority's Office.

Yours sincerely,

**Robin Wynne Williams**  
**Senior Planning Officer (Minerals and Waste)**

**Ar ran Gwasanaeth Cynllunio Mwynau a Gwastraff Gogledd Cymru /  
On behalf of the North Wales Minerals and Waste Planning Service**

County Hall, Mold. CH7 6NF  
[www.flintshire.gov.uk](http://www.flintshire.gov.uk)  
Neuadd y Sir, Yr Wyddgrug, CH7 6NF  
[www.sirfflint.gov.uk](http://www.sirfflint.gov.uk)

The Council welcomes correspondence in Welsh or English  
Mae'r Cyngor yn croesawu Gohebiaeth yn y Gymraeg neu'r Saesneg

**Working in Partnership with:  
Welsh**



# **Appendix IV**

EIA Scoping Opinion (dated 23<sup>rd</sup>  
March 2023)

**Andrew Farrow**  
Director of Environment  
Cyfarwyddwr yr Amgylchedd



Ms Angharad Rayner  
Site Director  
Safle Trawsfynydd  
Blaenau Ffestiniog  
Gwynedd  
LL41 4DT

Your Ref / Eich Cyf: 198/SNPA/AR/05662

Our Ref / Ein Cyf: NP5/73/287M

Date / Dyddiad: 23/03/2023

Ask for / Gofynner am: Mr RW Williams

Direct Dial / Rhif Union: 01286 679833

E-mail: [robinwynnewilliams@gwynedd.gov.uk](mailto:robinwynnewilliams@gwynedd.gov.uk)

Dear Ms Rayner,

**Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 - Regulation 14 Scoping Opinion**

**Proposal: The Demolition & Disposal of the Trawsfynydd Site Ponds Complex, Disposal of other minor structures and related capping and drainage works**

**Location: Trawsfynydd Nuclear Power Station, Blaenau Ffestiniog, LL41 4DT**

Thank you for your correspondence of 15<sup>th</sup> September requesting the Authority's Scoping Opinion for the above proposal together with further information submitted on the 02/02/2023. The LPA are satisfied that the request meets the requirements of the regulation 14 (2) of the regulations and please find enclosed the Authority's Scoping Opinion for the proposal described.

In adopting this Scoping Opinion, the Planning Authority has considered the requirements of the 2017 regulations, Welsh Office Circular 11/99: Environmental Impact Assessment, as well as current best practice towards preparation of an ES. In accordance with the 2017 regulations, the MPA has consulted on the report and the responses received from the consultation bodies have been taken into account in adopting this Opinion and considered the specific characteristics of the proposal, the type of development and the environmental features likely to be affected by the development. The application should be assessed and referred to within the Environmental Statement when the planning application is submitted.

This Scoping Opinion seeks to ensure that any Environmental Statement submitted with respect to a planning application for the development proposal described in the scoping

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Neuadd y Sir, Yr Wyddgrug, CH7 6NF  
[www.sirfflint.gov.uk](http://www.sirfflint.gov.uk)

The Council welcomes correspondence in Welsh or English  
Mae'r Cyngor yn croesawu Gohebiaeth yn y Gymraeg neu'r Saesneg

**Working in Partnership with:  
Welsh**



request includes information that is reasonably required to assess the environmental effects, and allow a determination to take place. The statement must address the baseline conditions, likely significant impacts, the probability of effects and the proposed mitigation measures. The information provided should be that which is necessary to demonstrate the risks, likelihood of occurrence, likelihood of any significant impact and an outline of the main alternatives studied by the applicant. Please note that further information may still be required once the statement has been submitted.

The Authority broadly agrees that the Scoping Report addresses the main issues for consideration:

- **Biodiversity**
- **Geo-environmental Impacts and Surface Water Quality**
- **Flood Risk and Drainage**
- **Long Term Radiological and Non-Radiological Impacts**
- **Air Quality**
- **Noise and Vibration**
- **Traffic and Transport**
- **Historic Environment**
- **Landscape and Visual Impact Assessment**
- **Socio Economic**
- **Cumulative Effects**
- **Alternatives**

The following will consider the content of the Scoping Report as submitted and will outline the matters which require modification, augmentation or clarification as part of any subsequent planning application and environmental statement.

## **1. Environmental Impact Assessment Approach**

The MPA is generally supportive of the approach outlined in the Scoping Report. The ES should include a chapter setting out the overarching methodology for the assessment, which clearly distinguishes effects that are 'significant' from 'non-significant' effects. Any departure from that methodology should be described in individual aspect assessment chapters. Where professional judgement has been applied this should be clearly stated. The ES topic chapters should report on any data limitations, key assumptions and difficulties encountered in establishing the baseline environment and undertaking of environmental effects. The applicants should satisfy themselves that the ES includes all the information outlined in Schedule 4 of the 2017 Regulations. In addition, the Applicant should ensure that the Non-Technical Summary includes a summary of all the information included in Schedule 4. The applicant should consider a structure that allows the author of the ES and the MPA to readily satisfy themselves that the ES contains all the information specified under Regulation 17 and Schedule 4 of the 2017 Regulations (Information for inclusion in Environmental Statements). Cross refer to the requirements in the relevant sections of the ES, and include a summary after the Contents page that lays out all the requirements from the Regulations and what sections of the ES they are fulfilled by.

## **2. Proposed Development**

The Environmental Statement should include a description of the development, the site, in terms of location, physical features, land use and should identify sensitive receptors within the locality. It should also include a description of surroundings and proposed development together with likely hours of operation / construction phase of the development, consideration will need to be given to the disposal/treatment/recovery/reuse of radioactive wastes and other waste streams which will be produced as referenced within the report. Consideration should be taken of the proposed decommissioning and site restoration collectively approved under planning permission and how / if this differs to the original concept but complements the long term decommissioning / restoration aims. This should be a methodology as to how the site is to be maintained throughout the decommissioning process and how upkeep will not result in the site becoming derelict over time.

## **3. Biodiversity**

### **Protected Sites**

As noted within the Scoping report (Baseline conditions 5.3), there are various protected sites within various distances to site. Table 5.7 - Potential biodiversity effects requiring assessment, indicates which sites are to be screened in/out. While the Authority broadly agree with the assessment presented, running water has been screened in due to the potential for contamination of off-site watercourses. As such, it should be noted that hydrologically linked protected sites, and those with water dependent mobile features may be impacted by the proposals (depending on the detailed assessment of ground and surface water), as part of any planning application submitted, avoidance and mitigation measures may be required to safeguard protected sites. The Local Authority will need to carry out a test of likely significant effects under regulation 61 of the Conservation of Habitats and Species Regulations 2010 (as amended). This will be done in consultation with NRW. If the assessment concludes there is likely to be a significant effect upon the conservation status of these sites, the Local Authority will need to carry out an Appropriate Assessment under the Regulations.

### **Protected Species**

It is noted; the assessment presented in Section 5 'Biodiversity' with regards to bats, great crested newts, otters, water voles, red squirrels, pine martens, dormice and Invasive Non-Native Species. The majority of these species have been scoped out because they were not identified on site. Considering the location of the proposed work within an area of hard standing and the nature of the work, we consider these proposals to have low likelihood of direct impact on protected species. As noted in the Protected Sites section, contamination of watercourses may impact on protected species in the vicinity, and this should be considered in future assessments. As bats have been scoped in, there will be a requirement to produce further information about how the delivery of these proposals will avoid any negative impacts on this species. As this work is not located directly where the bats are roosting, we would expect the main focus to be on commuting and foraging individuals. Any assessment should include the prevention of additional, inappropriate lighting of adjacent habitats and also the reduction of existing lighting where possible. Any lighting mitigation for bats will likely benefit other species, but attracting further species into the site would not be desirable



The applicant should be mindful that The Snowdonia National Park have a duty under Part 1 Section 6 of the Environment (Wales) Act 2016, TAN 5, LDP policies and biodiversity SPG 6 – Nature Conservation and Biodiversity, to ensure that there is no net loss of biodiversity or unacceptable damage to a biodiversity feature as part of the planning process. Biodiversity enhancement measures are discussed further within the pre-application response.

#### **4. Geo-environmental Impacts and Surface Water Quality**

The Authority disagrees with elements of the Scoping Report relating to this section. In particular the scoping out of certain receptors, particularly with the hydrogeological elements references in Table 6.6 and Table 6.8. We do not agree with the scoping out of the effects from impacts on groundwater behaviours. We advise that it is too early a stage to scope out such an important element. The breakage of hardstanding and excavation works (around pipes for example) may result in greater infiltration and could mobilise contaminants.

Notwithstanding, I am aware that NRW as consultee with in the Planning process and regulator of the site's Environmental Permit have had several discussions with Magnox around this topic and the importance of groundwater monitoring. Further documents have been provided as part of the Scoping submission including documents *DD-MISC-0732 Slide-pack on characterisation and monitoring Birmingham 17-11-22* and *198-SNPA-AR-05670\_Request for Scoping Opinion – Further Information\_02.02.23*; and there is now recognition of the importance of groundwater monitoring, both during and post-implementation within the scoping process. This is a key requirement due to the degree of uncertainty at the site in the short, medium and long term and the long duration over which activities will be occurring at the wider site. As it is understood there will be many activities occurring at the site which may influence groundwater conditions and that phasing of different works may be subject to change. Therefore, the ES should include an in-combination assessment of engineering works which may interact with groundwater on the site.

It is important to recognise the need to develop meaningful monitoring strategies in support of the application and ES that will be scrutinised and set to operate over many decades to minimise uncertainties as the project progresses. We would welcome the development of a strategized and adaptive monitoring regime and a Water Management Plan (WMP). A WMP would for example identify trigger values and reasonable next steps if particular trigger values were to be exceeded for 3 consecutive quarters etc.

The role of other activities, such as SuDS, and the impacts that these might have on groundwater are not integrated within the scoping assessment (3.5.8). It's our understanding that the ambition for the site is to discontinue pumped discharge to the lake and to use passive SuDS as a means of managing surface storm water and groundwater at the site. Potential effects from these proposals (whether that's relating to changes to the groundwater flow regime or groundwater quality) should be included within the ES.

#### **5. Flood Risk and Drainage**

With regards to flood risk, the LPA are satisfied with the content of Section 7 (Flood Risk and Drainage). It is agreed that the application site (red line boundary) is not within an area shown to be at risk of flooding from rivers or sea according to the Flood Map for Planning (FMfP). The FMfP represents better and more up-to-date information on areas at flood risk

than the Development Advice Maps (DAM) accompanying the current TA15: Development and Flood Risk (2004).

NRW's remit, with regards to advising on flood risk and suitability of any assessment relates to flooding as shown on the FMfP/DAM and any associated main rivers or the sea. We note that the proposal is unlikely to have the potential to cause significant environmental effects in terms of flood risk. However, please be aware that the Flood and Water Management Act 2010 created Lead Local Flood Authorities (LLFA-Local authorities in Wales). This was to enable LLFAs to lead on managing local flood risks i.e. risks of flooding from surface water, ground water and ordinary (smaller) watercourses. As such we would advise that the LLFA - Gwynedd Council in this instance are consulted on this section (7) of the EIA process. Gwynedd Council also act as the Sustainable Drainage Approval Body (SAB) and it is noted in section 4 (Other Consents) that approval was obtained in May 2022. We therefore agree with the Summary (7.3.38 to 7.3.43) in that the key risk to the Proposed Development relates to surface water risk. As stated above, whilst we are satisfied with the content of section 7, we would advise that the LLFA should be the appropriate body to comment and advise on the management of flooding from this source. We note and accept the commentary made on the (unlikely) failure of the dams retaining Llyn Trawsfynydd. For completeness and future reference, we would advise that the table 7.3 footnote 10 that the Climate change guidance has been updated:- [Climate change allowances and flood consequence assessments | GOV.WALES](https://gov.wales/government/consultations/2022/04/2022-04-20-climate-change-allowances-and-flood-consequence-assessments)

## **6. Long Term Radiological and Non-Radiological Impacts**

The information within the scoping report relating to the radiological impacts (chapter 8) have been reviewed. Notwithstanding comments on Geo-environmental Impacts and Surface Water Quality (which also apply to radiological issues), the receptors identified appear to be appropriate and we concur with the need for the further assessments proposed. The approach to the long-term radiological assessments is in line with what NRW would expect to support the permit application under GRR (Guidance on Requirements for Release of Nuclear Sites from Radioactive Substances Regulation) and NRW have indicated that they are in technical discussions with Magnox on the validity of the models being used.

It is also noted that a Health Impact Assessment as advocated within TAN 21 to ensure that human health issues are not overlooked is to be undertaken. It is trusted that the Health Impact Assessment will feed in to chapters of the ES correctly in accordance with my comments noted within section 1 of this opinion Environmental Impact Assessment Approach and to comments relating to Duplication and Repetition below.

## **7. Air Quality**

The Authority agrees with the contents of the Scoping report. However, dust control measures should form part of the planning application statements and reference will be included within the pre-app response. I also note that a Health Impact Assessment as advocated within TAN 21 to ensure that human health issues are not overlooked is to be undertaken, and reference to air quality will be included.

## **8. Noise and Vibration**

The Authority is in broad agreement with the contents of the Scoping Report and discussions should be entered with Gwynedd Council Public Protection Service to determine the scope

of a noise and vibration assessment in accordance with that of Construction Noise Assessment BS 5228 ABC Method.

## **9. Traffic and Transport**

Although we have not received a response from either Gwynedd Council Highway Department or Welsh Government as Trunk Road Authority, based on the information provided we believe that the contents of the Scoping report in relation to highway and transport issues to be satisfactory.

## **10. Historic Environment**

The Authority is in broad agreement with the contents of the Scoping Report.

## **11. Landscape and Visual Impact Assessment**

The Authority is in broad agreement with the contents of the Scoping report in relation to the landscape and visual amenity effects. I do however draw your attention to the contents of NRW's response of the 21<sup>st</sup> October and the matters raised relating to the landscape baseline. To this effect it is suggested that landscape change, mitigation and possible enhancement may be introduced within a Landscape Appraisal document submitted in support of the application.

## **12. Socio Economic**

This is discussed within chapter 14 of the Scoping Report. The Authority is in broad agreement with the contents of the Scoping report, and accept that this can be scoped out. However, socio-economics or socio-cultural considerations and the Welsh language are material planning considerations and will need to be addressed within supporting documentation within the application's submission.

## **13. Key Planning Policy**

The ES should include an assessment of policy which includes consideration of waste and all other material planning considerations. In undertaking a comprehensive assessment informing of compliance with both National and Local policies, legislation and guidance documents this should avoid the need to resubmit the same information under the guise of a Waste Planning Assessment as required by TAN 21. Therefore the chapter should cover what is required as part of a Waste Planning Assessment in being appropriate and proportionate to the nature, size and scale of the development proposed and should provide all of the information necessary for the local planning authority to make a decision on the application. Proposals for developments falling under disposal and recovery operations should explain in the Waste Planning Assessment, set out in Annex B, where the proposal fits within the waste hierarchy and why it represents the best overall environmental outcome.

Any environmental statement should take account of revisions and new guidance, policy or legislation which may be published.

## **14. Cumulative Impact**

The consideration of cumulative impact is an integral part of the EIA process and section 3.5 of the Scoping Report describes both intra-project and inter-project effects. As noted within the Report, this proposal forms a greater goal for final end-state and existing consents will need to be factored for assessment.

## **15. Alternatives**

This is referred to within section 2.9 of the Scoping Report under the heading Proposed Development and is an important part of the EIA process. Regulation 17(d) which requires amongst other considerations; *“a description of the reasonable alternatives studied by the applicant or appellant, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the significant effects of the development on the environment;”*.

Alternatives should therefore be considered in relation to the Proposed Development with the requirements of Regulation 17 and Schedule 4 of the 2017 Regulations and any reasonable alternatives studied by the applicant should be presented in the ES. The reasons behind the selection of the chosen option should also be provided in the ES, including where environmental effects have informed choices made.

It is worth bearing in mind that under the Conservation of Habitats and Species Regulations 2017 (“the Habitats Regulations”) unless it can be clearly shown to the MPA that the project would have no adverse effect of the integrity of any designated sites, it would have to be shown that there is no feasible alternative solution.

For consistency and to avoid confusion and repetition, it is urged that alternatives are discussed comprehensively within the ES with referencing as to relevance to the EIA process and to wider application requirements.

## **16. Other considerations and advice in preparing both ES and planning application (note there will be cross over between Scoping Opinion and formal Pre-application responses)**

### **Environmental Permit**

Noted within Section 4 – Other Consents of the Scoping Report and discussed wider within meetings with Magnox and NRW. It is anticipated that further discussions will ensue as to the timing of both planning and permitting applications and if both planning and environmental permit applications (GRR) are to be staggered or twin tracked. Based on discussions with NRW, the avoidance of unnecessary duplication of control is something the LPA and NRW strive to achieve. However, the EIA process will be subject to both regime applications. As the ES sets out the results of the EIA process; for consistency of decision, the avoidance of doubt and possible legal challenge, it is trusted that the planning application submission including the ES where there are both permitting and planning considerations; that those chapters will be consistent in contents and format.

### **Duplication and Repetition**

Generally, some applications that require the submission of Environmental Statements have contained superfluous information relating to issues that are irrelevant or of little importance

to the proposed development. Competent Authorities, consultees and the public should not have to deal with large volumes of material and repetition which is irrelevant to the decision-making process. It appears that the proposed application will include statements, assessments and information that falls outside the EIA process, such documents will undoubtedly contain overlapping information. To avoid repetition, it is strongly suggested that certain statements and assessments that are required as part of the planning application are amalgamated within the contents of the Environmental Statement with clear referencing stating where to discover the necessary information and what information relates to the different elements of the application. In doing so, it is trusted that this is clearly stated within the contents of the ES.

## **17. Regulation 14**

For the purposes of the requirements of Regulation 14 (4) of the above regulations, the following bodies/individuals were consulted as part of this Scoping Request and are aware that you are intending to submit a planning application which is to be accompanied by an environmental statement. Responses to the consultation are enclosed (No correspondence received from consultees labelled with a \*).

### **SNPA and Gwynedd Council Internal Consultees:-**

Ecologist; Natalie Parry – [Natalie.Parry@eryri-llyw.cymru](mailto:Natalie.Parry@eryri-llyw.cymru)  
Highways; - [francisgerardjonessherrington@gwynedd.llyw.cymru](mailto:francisgerardjonessherrington@gwynedd.llyw.cymru)  
\*Historic Environment Planning Officer; Eleanor Carpenter - [eleanor.carpenter@eryri.llyw.cymru](mailto:eleanor.carpenter@eryri.llyw.cymru)  
Planning Policy; Sion Roberts - [Sion.Roberts@eryri.llyw.cymru](mailto:Sion.Roberts@eryri.llyw.cymru)  
Public Protection (Pollution & Licensing); Mared Llwyd - [MaredLlwyd@gwynedd.llyw.cymru](mailto:MaredLlwyd@gwynedd.llyw.cymru)  
\*Drainage SUDS; Rhydian Roberts - [rhydianroberts@gwynedd.llyw.cymru](mailto:rhydianroberts@gwynedd.llyw.cymru)

### **External Consultees**

Natural Resources Wales; Tomos Hughes - [NorthPlanning@cyfoethnaturiolcymru.gov.uk](mailto:NorthPlanning@cyfoethnaturiolcymru.gov.uk)  
[Tomos.Hughes@cyfoethnaturiolcymru.gov.uk](mailto:Tomos.Hughes@cyfoethnaturiolcymru.gov.uk)  
Welsh Government, Trunk Roads;  
[NorthandMidWalesDevelopmentControlMailbox@Wales.GSI.Gov.UK](mailto:NorthandMidWalesDevelopmentControlMailbox@Wales.GSI.Gov.UK)  
CADW; Neil Maylan – [cadwplanning@gov.wales](mailto:cadwplanning@gov.wales) [Neil.Maylan002@gov.wales](mailto:Neil.Maylan002@gov.wales)  
\*WelshWater; [developer.services@dwrcymru.com](mailto:developer.services@dwrcymru.com) [DSplanningconsultations@dwrcymru.com](mailto:DSplanningconsultations@dwrcymru.com)  
[DSSABconsultations@dwrcymru.com](mailto:DSSABconsultations@dwrcymru.com)  
\*Cyngor Tref Blaenau Ffestiniog - [clerc@cyngortrefffestiniog.cymru](mailto:clerc@cyngortrefffestiniog.cymru)  
\*Cyngor Cymuned Trawsfynydd - [cyngor.trawsfynydd@gmail.com](mailto:cyngor.trawsfynydd@gmail.com)  
\*Cyngor Cymuned Ganllwyd- [mike.owen4@btopenworld.com](mailto:mike.owen4@btopenworld.com)

### **Public and Community Engagement**

As part of this Scoping exercise, we have received cautionary interest from the listed Community and Town Councils above. As discussed, public engagement should be undertaken to explain what are the proposed future developments for the site.

For clarity It is encouraged that prior to submission, pre-application discussions are undertaken through the formal process.

I trust that the North Wales Minerals and Waste Planning Service and The Snowdonia

National Park Authority's position is explained above and please do not hesitate in contacting should you wish to discuss any issue further.

Yours faithfully,

**Robin Wynne Williams**  
**Senior Planning Officer (Minerals and Waste)**

**Ar ran Gwasanaeth Cynllunio Mwynau a Gwastraff Gogledd Cymru /**  
**On behalf of the North Wales Minerals and Waste Planning Service**

**Enc.**



# Appendix V

## Viewpoints Analysis

Viewpoint reference	Grid reference	Location	GLVIA3Error! Bookmark not defined. Typology and Selection Justification
1	268420, 338154	Summit of Craig Gyfynys	Representative Viewpoint – The highest publicly accessible location adjacent to the Trawsfynydd site with open views representative of those available to recreational receptors within the Open Access Land.
2	270048, 337651	NCR 82 close to Coed-cae-du	Representative Viewpoint – Represents views across Llyn Trawsfynydd available to recreational receptors on the NCR 82 to the south-east of the Trawsfynydd site.
3	270362, 335798	Carreg yr Ogof Open Access Land	Representative Viewpoint – Representative of views across Llyn Trawsfynydd available to recreational receptors within the Open Access Land west of the Trawsfynydd site.
4	268996, 335457	Cae Adda Campsite	Representative Viewpoint –Representative of views across Llyn Trawsfynydd for recreational receptors using Cae Adda Campsite south of the Trawsfynydd site.
5	270172, 334922	Footbridge over south-eastern corner of Llyn Trawsfynydd	Illustrative Viewpoint – Illustrative of the open panoramic views across Llyn Trawsfynydd available from the southern edge of the reservoir.
6	271027, 333504	A470 south of Trawsfynydd	Representative Viewpoint – Representative of views available to users travelling northbound on the A470.

The visual role of the ponds complex and an explanation as why it is not visible, is set out for each of the six viewpoints below.

### Viewpoint 1 – Summit of Craig Gyfynys

*Typology: specific viewpoint.* The summit provides panoramic views in all directions. In this view the reactor buildings are the visually dominant built component, although they are sited well below the eastern horizon. Other built components within the Trawsfynydd site that are visible are part of the substation and the roof of the ILW store, otherwise the mature perimeter, mixed tree cover screens other low-level components. The ponds complex is not discernible and makes no contribution to the form, mass and scale of the Trawsfynydd site in this view. The mobile cranes required for lifting of larger items during the demolition and backfilling of the ponds complex could be temporarily visible in the view, although, as it is not expected that these will be significantly higher than the height of the ponds complex building, they are likely to be negligible visual elements which may not be readily discernible in the visual context of the existing built development at the Trawsfynydd site.

### Viewpoint 2 – National Cycle Route 82 close to Coed-cae-du

*Typology: representative viewpoint.* The section of NCR 82 routed along the eastern shoreline of Llyn Trawsfynydd provides north-bound cyclists with regular changing views of the reactor buildings depending on the level of foreground vegetation screening and seasonality. Where open, unfiltered views are available the reactor buildings are highly prominent due to their scale, form, colour and extension above the horizon all of which

attract the visual receptor's eye. The south-eastern end of the ILW store can be identified under examination, although in casual (and moving) views it is visually absorbed by its adjacent shoreline and perimeter/hillside mature tree and shrub planting. The ponds complex is screened, primarily by the much larger reactor buildings, and at its south-eastern end by shoreline vegetation cover. Its decommissioning, including temporary deployment of cranes, would be highly unlikely either to be visible to recreational receptors using this section of the NCR or to alter the composition of this view.

### **Viewpoint 3 – Carreg yr Ogof Open Access Land**

*Typology: illustrative viewpoint.* The moderate sized open access area is located on the south-east shore of Llyn Trawsfynydd which occupies much of the fore- and middle ground in the view. The reactor buildings are prominent due to their form and colour, but at a separation distance of almost 3km they are visually absorbed into the wild and mountainous landscape aided by the immediate setting provided by the Dame Sylvia Crowe landscape. No other components of the Trawsfynydd site are visible including the ponds complex.

### **Viewpoint 4 – Cae Adda Campsite**

*Typology: illustrative viewpoint.* This partial, framed viewpoint is located on the southern shore of Llyn Trawsfynydd. Similar views are periodically available along the minor road routed close to the Llyn's southern shore. The framing provided by the break in the shoreline tree cover adds visual emphasis to the reactor buildings that are located ~3km to the north, although the buildings do not extend above the elevated horizon formed by the Moelwyn massif. No other built components at the Trawsfynydd site are identifiable and the ponds complex is not visible.

### **Viewpoint 5 – footbridge over south-eastern corner of Llyn Trawsfynydd**

*Typology: representative viewpoint.* This viewpoint represents the open views over separation distances of ~4km that are available where receptors can access the south-eastern shoreline of Llyn Trawsfynydd. The lake forms the fore- and middle ground and the uninterrupted elevated skyline formed by Snowdonia's mountains attracts most visual attention. The reactor buildings are moderately prominent, but at these separation distances their design begins to result in the buildings becoming more visually recessive against the backdrop. No other built components, including the ponds complex, are visible.

### **Viewpoint 6 – A470 south of Trawsfynydd**

*Typology: illustrative viewpoint.* Illustrative of the regular, but not continuous views, available to north-bound receptors travelling on this section of the A470. Away from the more open views often available close to Llyn Trawsfynydd and at separation distances of over 5km, the diminishing scale of the reactor buildings makes them more susceptible to screening by small-scale, close-by, vegetation and their design and colour blends them in against the naturalistic colours of the backdrop. No other built components at the Trawsfynydd site are visible.

## **Analysis**

The viewpoint review has found that the ponds complex is not visible in any of the six viewpoints identified as having views toward it. In only one view, the close-distance view available from the elevated, open access area on Craig Gyfynys on the western side of the Trawsfynydd site (Viewpoint 1), is it considered likely that the cranes if temporarily deployed for part of the decommissioning process could be partially visible. In this view, it is considered that, if visible, any cranes used would form a negligible visual element which would not be likely to be readily discernible within the context of the wider Trawsfynydd site.

The ponds complex is not visible in close distance views from NCR 82 or in views from locations at greater separation distances, including the most open publicly accessible views on, or close to, the eastern and southern shorelines of Llyn Trawsfynydd. The absence of views is due to the ponds complex buildings having a low height and being located adjacent to larger and taller built elements, primarily the two reactor buildings.

In some views, for example from the south-east and south, additional screening of the south-eastern end of the ponds complex is provided by the mature tree cover in the Dame Sylvia Crowe garden and landscape works.

These findings indicate that there is no effective visual effects pathway by which the demolition of the ponds complex could result in significant landscape or visual effects. As a result, no significant visual effects would be experienced by visual receptors and no significant landscape effects (via a visual pathway) would be sustained by the national park, landscape character areas, LANDMAP aspect areas or any other landscape receptor.

Given that no valued landscape elements will be lost as a result of the proposed development, there is no scope for landscape receptors to sustain significant direct effects due to changes to the physical fabric of the landscape. The Proposed Development has no potential to give rise to significant landscape or visual effects, and on this basis was excluded from the scope of the EIA.

# Appendix VI

## Guidance on requirements for release from radioactive substances regulation (GRR)

The proposed on-site disposals of suitable radioactive waste will require a variation to the Trawsfynydd site's permit under Environmental Permitting Regulations 2016 (EPR16)<sup>12</sup>. The application to Natural Resources Wales (NRW) for this permit variation has been made in accordance with the document *"Guidance on Requirements for Release of Nuclear Sites from Radioactive Substances Regulation"* (known informally as the "GRR")<sup>13</sup> and other permitting guidance.

With respect to the long-term radiological aspects, the GRR requirements include the following:

- While the Trawsfynydd site continues to have a radioactive substances environmental permit, the dose to a member of the public must not exceed 0.3 milli-Sieverts per year. Actual doses from the Trawsfynydd site are, and will remain, far below this limit.
- When the site ceases to have a radioactive substances environmental permit (which the Applicant expects to be some decades into the future), aside from inadvertent (uncontrolled) human intrusion scenarios, the radiological risk of death or hereditary defect to a member of the public deriving from the remaining radioactivity in the disposals should be consistent with or lower than the GRR risk guidance level of one in a million per year. This is equivalent to a radiation dose to an individual member of the public of about 17 micro-Sieverts<sup>14</sup> per year assuming a probability of 1 of such radiation exposure. This annual dose can be compared with the average background level of radiation exposure in the UK of 2,700 micro-Sieverts per year (2.7 milli-Sieverts per year), which corresponds to a risk of about 1 in 7,500 per year.
- The effective dose to a member of the public during and after an inadvertent (uncontrolled) intrusion such as an excavation without knowledge of the radiological hazards remaining on site, should be consistent with the GRR dose guidance level, meaning a dose in the range of around 3 milli-Sieverts per year (if there would be prolonged radiation exposure to any one person as a result of the intrusion) to around 20 milli-Sieverts in total to any one person (if there would only be a short, time-limited exposure as a result).
- All of the above are in the context of the overriding principles of optimisation and minimisation, meaning that the doses to members of the public should be kept as low as reasonably achievable throughout the period of regulation under environmental permitting and beyond.
- These radiological aspects are explained in further detail in the Environmental Statement that supports this planning application.

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<sup>12</sup> UK Government (2016). The Environmental Permitting (England & Wales) Regulations 2016, and NRW Permit EPR/GB3835DE/V004 for Trawsfynydd Decommissioning Site, effective 1 January 2020 - for the management of radioactive wastes.

<sup>13</sup> SEPA, Environment Agency and NRW (2018) Management of radioactive waste from decommissioning of nuclear sites: guidance on requirements for release from radioactive substances regulation.

<sup>14</sup> A micro-Sievert is one millionth of a Sievert, Sieverts being the standard unit of radiation dose. A milli-Sievert is one thousandth of a Sievert.

# Appendix VII

## Waste Planning Assessment

### **Waste Policy Statement**

The proposed development includes leaving suitable material in situ. Whilst this could be considered to be classed as 'disposal' operation, which is at the bottom of the waste hierarchy, it could also be considered as preventing the arising of waste in the first place, which is at the top of the waste hierarchy. This is because, if the proposed approach were not being pursued, there would be a large volume of waste that would need to be managed as a consequence of removing all the sub surface structures, which would then require disposal elsewhere. Similar arguments apply to the use of demolition arisings for the infill of unwanted voids.

The proposals include retaining suitable arisings from the demolition activities on site and processing/recycling that material on site for re-use as recycled aggregate in the creation of the proposed concrete cap sub-base. This approach of recycling and re-using the demolition arisings is considered to be in line with the waste hierarchy and such an approach will reduce the likelihood of the need to export that material for disposal or the need to import virgin, or other suitable, material.

In terms of compliance with policy related to need for the development, the main body of the planning statement considers the relevant planning policy context and explains why the development proposed is the preferred option for the Applicant. With respect to location, it should be noted that the location of the proposed development is fixed by the decision in the late 50s to construct a power station at Trawsfynydd.

With respect to existing and projected future demand for waste management, matters such as existing and future markets and capacities are not considered applicable as the proposed development, by its very nature, will not involve the importation of waste so will not serve a 'market' and is not seeking to meet an existing or future demand for additional capacity.

The submitted statement of community involvement submitted as part of this application provides a description of the consultations undertaken by the applicant around the proposed development.

### **Details of the Development**

Details of the proposed timescales, volumes, site layout, plant to be used, potential amenity and nuisance impacts, including air pollution are set out in the application documents, notably the accompanying Environmental Statement.

### **Declaration**

It is confirmed that the waste hierarchy has been considered in developing the proposals currently forming this planning application.

# Contact Details

## Enquiries

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