

Wylfa Newydd Project

Request for Non-Material Change no.2

Marine Vessel Movements

PINS Reference Number: EN010007

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Revision 2.0

Planning Act 2008

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

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Contents

1	Introduction	1
1.1	Purpose of this report	1
1.2	Scope of this report	1
1.3	Non-materiality of the proposed change	2
1.4	Engagement and consultation on the proposed change.....	3
1.5	Summary of responses received.....	4
1.6	Procedure after consultation	6
2	Non-Material Change: Marine Vessel Movements.....	8
2.1	Background to the proposed change	8
2.2	Description and justification of the proposed change	9
2.3	Summary of environmental appraisal.....	10
	<i>Environmental Statement</i>	10
	<i>Shadow Habitats Regulation Assessment</i>	11
	<i>Other assessments</i>	12
2.4	Topic assessments.....	12
	<i>Air quality</i>	12
	<i>Noise and vibration</i>	15
	<i>Marine Environment</i>	16
	<i>Shipping and navigation</i>	18
2.5	Schedule of engagements.....	30
2.6	Schedule of consequential amendments to application documents	32
3	References	34
4	Appendix 1: Copies of "Neighbour News"	35
5	Appendix 2: Copies of responses received during consultation	36
6	Appendix 3: Horizon's responses to consultation responses received	37
7	Appendix 4: Copies of letters sent to additional consultees.....	58

List of Tables

Table 2-1	Effect of the proposed change on the effect descriptors for NO ₂ concentrations	14
Table 2-2	Identified hazard frequency in the NRA for the operational phase of the MOLF	19
Table 2-3	Identified additional mitigation (control) measure frequency for the NRA during the operational phase of the MOLF	20
Table 2-4	Likely new or different environmental effects	21
Table 2-5	Schedule of engagements	30
Table 2-6	Schedule of consequential amendments to application documents	32
Table 3-1	Schedule of references	34

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1 Introduction

1.1 Purpose of this report

- 1.1.1 The purpose of this report is to set out Horizon Nuclear Power Wylfa Limited's ("Horizon") formal written request for a non-material change to the number of vessel movements permitted to occur during the construction phase of the Wylfa Newydd DCO Project. Horizon is currently seeking a Development Consent Order to enable the construction, operation and maintenance of the Wylfa Newydd DCO Project ("**DCO application**"), which was submitted and accepted for examination by the Secretary of State for Business, Energy and Industrial Strategy on 28 June 2018. The DCO application is currently in the pre-examination phase.
- 1.1.2 Horizon carried out public consultation on the proposed change between **Tuesday 14 August 2018 and Friday 28 September 2018**.
- 1.1.3 Following the close of consultation, Horizon considered the responses received and updated this document to have regard to those responses. This updated document is now submitted to the Examining Authority as a formal written request for the non-material change to be considered for acceptance into examination by the Examining Authority.
- 1.1.4 The non-material change proposed is seeking to increase the upper daily limit from four movements per day (two vessels) to 16 movements per day (eight vessels) within the total vessel movements described and assessed in the DCO application. The total number of vessel movements does not change from that described and assessed in the DCO application. These changes are proposed to maximise use of the Marine Off-Loading Facility (MOLF) at certain times and allow for programme recovery following delays, for example after bad weather. No new or different likely significant environmental effects are predicted in relation to the proposed change.
- 1.1.5 This document uses terms and definitions that are taken from and can be seen in the DCO General Glossary (APP-006).

1.2 Scope of this report

- 1.2.1 This report describes the proposed change being sought by Horizon to the DCO application and sets out the environmental appraisal of this proposed change. It includes a table (Table 2-4) clearly setting out the implications of the proposed change to the assessments detailed in the DCO application, and a statement on the non-material effect (if any) of the proposed change.
- 1.2.2 This report also includes a summary of the consultation undertaken and a 'schedule of engagement' (Table 2-5) listing the parties that were identified as having an interest in this proposed change.
- 1.2.3 Finally, a 'schedule of consequential amendments' (Table 2-6) is provided, listing the original application documents (or parts thereof) which may be amended by Horizon should the Examining Authority accept the proposed change into examination.

- 1.2.4 Horizon's objective in compiling the original consultation materials (and subsequently this document) was to ensure that stakeholders were provided with sufficient information to comment on the change – and, after consultation, for the Examining Authority to be able to make a decision on whether or not to accept the change into the examination of the DCO application.
- 1.2.5 However, should the stakeholders or the Examining Authority require any additional information in support of this request, Horizon will endeavour to provide it as soon as possible in response to any request for such information.

1.3 Non-materiality of the proposed change

- 1.3.1 In assessing the proposed change, Horizon has had regard to the advice contained in the Planning Inspectorate's Advice Note 16: *How to request a change which may be material* (Version 2, March 2018) [RD1].
- 1.3.2 In determining whether the proposed change was material or non-material, Horizon reviewed its Environmental Statement (APP-055 to APP-401) and its associated appendices submitted as part of the DCO application to determine whether or not there were any new or different likely significant effects resulting from the proposed change:
 - air quality (chapter D5, APP-124)
 - noise and vibration (chapter D6, APP-125);
 - terrestrial and freshwater ecology (via effects to air quality) (chapter D9, APP-125);
 - marine environment (chapter D13, APP-132);
 - shipping and navigation (chapter D15, APP-134);
 - combined topic effects (chapter D16, APP-135);
 - intra-project cumulative effects (chapter I4, APP-387); and
 - inter-project cumulative effects (chapter I5, APP-388)
- 1.3.3 The proposed change has been reviewed and assessed, and has not been found to result in any new or different likely significant environmental effects than those reported in the Environmental Statement (refer to Table 2-4). It is also not anticipated that the proposed change to daily peak vessel movements or numbers will result in any new or different likely significant cumulative environmental effects resulting from the interaction with other projects.
- 1.3.4 In parallel to this change, Horizon also consulted on a further proposed non-material change to extend the hours under which blasting operations can be undertaken. Following consultation, a formal written request for this non-material change was submitted to the Examining Authority for consideration. It is not anticipated that the proposed change to the daily peak of vessel movements or numbers outlined in this report will interact with the blasting schedule change to produce any new or different likely significant environmental effects resulting from the interaction of these projects either in combination or cumulatively with any other projects.
- 1.3.5 The Shadow Habitats Regulations Assessment Report (APP-050 and APP-051) has also been considered in light of the proposed change and Horizon

has concluded that the change would not result in a change to the findings and conclusions. All other assessments would remain unaffected by the proposed change.

- 1.3.6 The Marine Licence application has also been considered and it has been deemed that there are no implications for the application due to the activities not being licensable under the Marine and Coastal Access Act.
- 1.3.7 Taking the above factors into account, and the representations received in response to this consultation, Horizon therefore believes that the proposed change to vessel movements should be regarded as a non-material.

1.4 Engagement and consultation on the proposed change

Historical consultation

- 1.4.1 For the marine aspects of the Wylfa Newydd Project, Horizon requested a screening and Scoping Opinion from Natural Resources Wales (NRW) under Regulations 11 and 13 from Schedules 2 and 4 of the Marine Works (Environmental Impact Assessment) (Amendment) Regulations 2017. The responses were received and relevant comments are detailed in table B15-4 of chapter B15 of the Environmental Statement (APP-080).
- 1.4.2 The principle of promoting movement of freight and bulk materials by sea is in line with Government policy and was consulted on principally during the pre-application consultation Stage 2 (PAC2). Limited consultation responses on this topic focussed around engagement with Trinity House over navigation and providing an EIA and Navigational Risk Assessment within the Wylfa Newydd DCO application. The daily peak vessel movements or vessel numbers were not specifically consulted upon although within the Preliminary Environmental Information Report for PAC2 reference is made to an average of two vessels movements per day. The design basis of the MOLF within the Wylfa Newydd DCO application has always allowed for a potential increase in daily peak movements and vessels numbers.

Consultation on the proposed change

- 1.4.3 In developing its approach to consultation on the proposed change, Horizon identified a number of parties which it considered would have an interest in the proposed change (including prescribed persons under section 42(a)-(d) of the Planning Act 2008, statutory consultees and Persons with an Interest in Land). These parties are listed in Section 2.6 and were specifically notified of the consultation on the proposed change.
- 1.4.4 As noted above, consultation on the proposed change was undertaken from Tuesday 14 August 2018 until Friday 28 September 2018. This consultation was a combined consultation with the proposed change to the blasting strategy.
- 1.4.5 English and Welsh copies of the consultation materials (the previous version of this report, Technical Report and Summary Info Sheets were published on Horizon's consultation website (www.horizonnuclearpower.com/consultation)

so that they were publicly available to anyone with an interest in the proposed change.

- 1.4.6 During the consultation period, Horizon hosted two drop-in events on its consultation bus in Cemaes and Tregele. These events were held on Tuesday 4 September 2018 at the Cae Pwmp and Douglas Inn car parks. The purpose of these events was to enable members of the public to come and speak to a Horizon representative about the proposed change and view hard copies of the consultation materials. The Cemaes event was attended by 18 parties, and the Tregele event by 15 parties (total of 33 parties).
- 1.4.7 In addition to these consultation events, Horizon also undertook a maildrop of its newsletter '*Neighbour News*' to all households within the Cemaes and Tregele areas. The newsletter included an article which detailed the proposed change, upcoming consultation events and how people could have their say on the proposals. A copy of this newsletter is appended to this document as **Appendix 1**.
- 1.4.8 All parties were asked to provide their responses to Horizon either by mail, telephone or email) via its freepost address (Freepost WYLFA NEWYDD) or by emailing wylfaenquiries@horizonnuclearpower.com. A freephone number (0800 954 9516) was provided for questions. Follow-up calls and meetings were also offered if required. Only one such request was received (to discuss details of the marine vessel movements with a representative of Holyhead Sailing Club), and a meeting was arranged accordingly at the Tregele consultation event.

1.5 Summary of responses received

- 1.5.1 At the end of the consultation period, Horizon had received responses from eight parties, including from North Wales Wildlife Trust ("NWWT"), Trinity House, and Natural Resources Wales ("NRW").
- 1.5.2 This section sets out a summary of the consultation responses received and Horizon's response. Copies of the responses received and Horizon's detailed response has been appended as **Appendices 2 and 3**.

Views on materiality

- 1.5.3 No responses were received that disagreed with Horizon's conclusion that the proposed change was non-material. In its response, NRW agreed with Horizon's assessment that the proposed change would not result in any new or different significant effects from those assessed within the DCO application.

Reference to the DCO application

- 1.5.4 The responses of NRW and NWWT notes that they disagree with the conclusions in the Environmental Statement and the Shadow Habitats Regulations Assessment (submitted as part of the DCO application) on the likely effects on the Anglesey Tern Special Protected Area ("SPA") (noise, vibration and visual) and the adequacy of the mitigation proposed to control these effects (i.e. the Wylfa Newydd Code of Construction Practice ("CoCP") (APP-414)). NWWT's response also raises concerns on the Marine Licence (which has been applied for separately to the DCO).

- 1.5.5 While supporting the proposed change, the responses from North Wales Fire and Rescue Service, Llanbadrig and Mechell Community Councils seek further information regarding contingency arrangements should the MOLF be delayed or unavailable, and the proposed harbour management regime and enforcement powers.
- 1.5.6 A local resident also raised concerns on the impacts of the Project on recreational boats.
- 1.5.7 While Horizon acknowledges these concerns, they relate to the examination of the DCO application itself and its documents and assessments, rather than the assessment of the proposed change. For this reason, Horizon considers that these concerns will be considered as part of the examination process, rather than through this change request. (Horizon has, however, addressed the SPA and the marine environment as part of its assessment of the proposed change in section 2.3 and 2.4 below.)

NWWT

- 1.5.8 In addition to concerns on the underlying DCO application assessments, NWWT's response makes a number of references to the proposed change enabling an increase in the total number of vessel movements, a "four-fold increase in vessel movements" or a mix of changes in vessel rates over the construction period.
- 1.5.9 Horizon confirms that the proposed change will not increase the total number of vessel movements allowed under the DCO; it only seeks a change to the upper daily limit to maximise the use of the MOLF and provide contingency in the event of delays.

North Wales Fire and Rescue Service

- 1.5.10 The North Wales Fire and Rescue Service's response notes support for the proposed change to ensure that the MOLF is fully utilised; however, it notes that the Navigational Risk Assessment (Environmental Statement appendix D15-1, APP-235) ("NRA") will need to be updated to reflect this change, if accepted.
- 1.5.11 Horizon acknowledges this response and that updates to the NRA will be required if the proposed change is accepted by the Examining Authority into examination. If that occurs, then Horizon will submit these updates in accordance with the identified examination deadline.

Trinity House and North Wales Police

- 1.5.12 Responses received from Trinity House and North Wales Police did not raise any objections or concerns with the proposed change.

Local resident 1

- 1.5.13 A local resident provided Horizon with a number of clarification questions on the proposed change and the Project. Responses to each of these questions are set out in **Appendix 3**.

- 1.5.14 In addition to the clarification questions, the local resident advised Horizon of a number of other stakeholders (e.g. local sailing clubs) that should be consulted on the proposed change and noted a few errors within the consultation materials and in the DCO application itself.
- 1.5.15 Following receipt of this response, Horizon sent a letter to each of the suggested parties; however, no responses were received. A copy of the letter is appended as **Appendix 4**. Horizon also made updates to this report to ensure that the errors identified by the local resident were resolved. In respect of errors in the DCO application, Horizon will pick these up in the errata sheets that it intends to submit during examination.

Local Resident 2

- 1.5.16 The response of a local resident raised concerns about the proposed change on health and well-being of local people and tourism, the inadequacy of the consultation events held and why the proposed change had not been included in the original DCO application.
- 1.5.17 As set out in Table 2-4 and section 1.3 above, in preparing the proposed change Horizon undertook a detailed review of the assessments in the DCO application and concluded that the proposed change will not have any new or different significant effects than those already assessed under the DCO application, including effects on local community and tourism. The appropriateness of the effects that have been identified in the DCO application will be considered by the Examining Authority as part of its examination; however, the proposed changes do not alter the original conclusions.
- 1.5.18 The consultation events that were held by Horizon were only one of the ways in which the public could consider and provide their views on the proposed change. In addition to the consultation materials being publicly available on the consultation website, Horizon also undertook maildrops within affected areas, provided a free postal address and enquiry line, and offered further meetings with affected parties if required. For these reasons, Horizon considers that the consultation process was adequate to enable all parties to provide their views on the proposed change.
- 1.5.19 In respect of the timing of the proposed change, section 2.2 below outlines that the proposed change has arisen following selection of the project management contractor (who raised concerns on the practicability of the DCO vessel movements) and Horizon seeking additional flexibility within the delivery programme in the event of bad weather or the MOLF being unavailable for temporary periods. For this reason, this change could not be included within the DCO application, and therefore is being sought as part of the examination process.

1.6 Procedure after consultation

- 1.6.1 Horizon has considered each response received from the consultation on the proposed changes and has updated this report to detail and have regard to those responses. This updated document is now submitted to the Planning Inspectorate as a formal written request for the non-material change (this document) to be considered and accepted by the Examining Authority.

1.6.2 Horizon appreciates that the acceptance and appropriate procedure for the consideration and examination of this proposed change is entirely at the discretion of the Examining Authority. However, if the Examining Authority is minded to accept the proposed changes into the examination, Horizon considers that the remainder of the examination period would provide sufficient time for Interested Parties to consider and make representations on the published proposed changes to the Examining Authority and for any other procedural requirements to be met.

2 Non-Material Change: Marine Vessel Movements

2.1 Background to the proposed change

2.1.1 Since the submission of the DCO application, ongoing contractor engagement has revealed the need to assess an increased peak daily limit of vessel movements to and from the MOLF. The total number of vessel movements does not change from that described and assessed in the DCO application.

2.1.2 The DCO application sets out the following total vessel movements in the NRA assumed over the construction period.

Vessel type	Project phase	No. of Movements
Inshore cutter suction dredger	Construction of MOLF	56
Offshore cutter suction dredger	Construction of MOLF	32
Dredging barges	Construction of MOLF	818
Bulk material vessels	Operation of the MOLF	3,142
Barges for indivisible loads	Operation of the MOLF	660

2.1.3 In chapter D1, paragraph 1.7.38, of the Environmental Statement, (APP-120), Horizon describes, '*the peak number of vessels is still to be determined but would be likely to be between 103 and 122 over a three-month period, which equates to approximately 1.3 vessels per day*'.

2.1.4 The basis of assessment for the marine environment, chapter D13 of the Environmental Statement, (see paragraph 13.6.285) and the Shadow Habitats Regulations Assessment Report, states '*the peak number of vessels on-site is predicted to average approximately 15 per week over a three-month period*'. Within the Shadow Habitats Regulations Assessment Report it is further stated that "*vessel movements within the area would be expected to occur on average twice a day*". Both the assessment in chapter D13 of the Environmental Statement, (see paragraph 13.6.285) and the Shadow Habitats Regulations Assessment Report assumed vessels travel at an average of 10 knots.

¹ NB: the reference to vessel movements in the Shadow HRA is a typographical error and should be a reference to an average of two vessels and four vessel movements.

2.1.5 The basis of modelling and assessment for air quality, chapter D5 of the Environmental Statement assumes that two vessels access the MOLF per day (resulting in four vessel movements). For each vessel, one hour is allowed for manoeuvring in (and therefore using the main engines), one hour for manoeuvring out (on main engines), and 22 hours at berth (and therefore using auxiliary engines).

2.1.6 The noise modelling that supports the assessment for chapter D6 of the Environmental Statement considers the realistic worst case 1-hour periods in the day and at night. Both the daytime and night-time noise models assume one vessel movement in to or out of the MOLF within this time period.

2.2 Description and justification of the proposed change

2.2.1 Since the preparation and submission of the DCO application, additional work has been ongoing on the construction of the Power Station including examining the use of the MOLF and the risks posed to the wider Project programme if the use of the MOLF is not maximised throughout the course of Main Construction. This work has arisen following selection of the project management contractor (who raised concerns on the practicability of the DCO vessel movements) and Horizon seeking additional flexibility within the delivery programme in the event of bad weather or the MOLF being unavailable for temporary periods.

2.2.2 Whilst an average of two vessels per day is a reasonable assumption to make over the entire construction programme, the proposed change is focussed on assessing a daily peak in vessel movements and hence vessel numbers, but within the constraints of the total vessel movements stated in the NRA for the construction programme (see paragraph 2.1.2). The primary objectives of the change are to maximise use of the MOLF at key periods and allow recovery of the programme following delays, for example from tides, weather, varying load sizes, or dockside closures. The number of daily vessel movements throughout the construction programme would be expected to fluctuate from day-to-day. Therefore, on some days it is possible that the MOLF would receive no vessel deliveries, whilst on other days the MOLF may be filled to its design capacity of 4 vessels.

2.2.3 In order to maximise the use of the MOLF, Horizon believes that there is a need to change the upper daily limit of vessel movements up to a peak of 16 movements per 24-hour period (eight movements per 12-hour period). A vessel movement is treated as one trip in to or out of the MOLF. This peak will be constrained by berth availability and it is assumed all three berths and the lay-by berth would be available. Such a change would allow the full benefits of the MOLF to be realised, namely:

- fully utilise the MOLF to the maximum extent possible allowing for a greater scope of deliveries by ship (hence taking deliveries off the road network);
- allow for periods of increased use after an unplanned closure (for example after a storm); and
- reduce waiting times for vessels waiting to dock.

2.2.4 These would reduce the risks posed to the wider project programme by ensuring the construction schedule can be reliably met throughout the course of main construction.

2.2.5 Therefore, this approach also aligns with wider Project ambitions to meet the urgent national need for new, low carbon electricity generation that is safe, secure and affordable, in accordance with UK Government policy set out in National Policy Statement EN-1.

2.2.6 The proposed change only relates to the upper daily limit of vessel movements that may use the MOLF in any given 24-hour period and does not affect the overall number of marine movements or vessels stated in the NRA or the average number of vessels stated in the Shadow Habitats Regulations Assessment Report which would be using the MOLF over the whole construction programme. We recognise however that in requesting this change in daily peak the NRA requires updating to cover any additional hazards this change presents.

2.2.7 The proposed change in vessel movements as described above is translated into the following basis for modelling and assessing the proposed change in the Environmental Statement.

- Noise modelling for day-time and night-time periods within a 1-hour period. In these models we assume two movements within an hour to represent a worst-case.
- Air quality modelling for eight vessels accessing the MOLF per day (16 movements per day). We further assume that there are four berths in near-constant use. For each vessel, we allow one hour for manoeuvring in (and therefore using the main engines), one hour for manoeuvring out (on main engines), and 10 hours at berth (and therefore using auxiliary engines).

2.3 Summary of environmental appraisal

2.3.1 The proposed change has been reviewed and assessed to identify any potential likely significant effects that would be new or different to those assessed in the DCO application. This information is summarised in table 2-4, where relevant, further discussion is provided below.

Environmental Statement

2.3.2 This review identified that the proposed change could potentially have implications for the following assessments outlined in the Environmental Statement:

- air quality (chapter D5) (from air quality effects during construction);
- noise and vibration (chapter D6) (from noise and vibration effects during construction and the interaction with human and ecological receptors);
- terrestrial and freshwater ecology (from effects to terrestrial flora via effects to air quality during construction) (chapter D9);

- marine environment (chapter D13,) (from effects to marine mammals via vessel strikes and underwater noise, as well as effects to seabirds from visual disturbance during construction);
- shipping and navigation (chapter D15), and the NRA (Appendix D15-1) (from effects to hazards);
- combined topic effects (chapter D16); (from effects to air quality, noise and vibration, and terrestrial and freshwater ecology assessments);
- intra-project cumulative effects (chapter I4); and
- inter-project cumulative effects (chapter I5).

Shadow Habitats Regulation Assessment

2.3.3 Further consideration has also been given to the potential effect of the proposed change to the appropriate assessment for habitats and species (terrestrial, freshwater and coastal) of Special Areas of Conservation (SACs) and Ramsar sites detailed in the Shadow Habitats Regulations Assessment Report via effects from air quality.

2.3.4 The effects from changes in air quality have been screened into the appropriate assessment for the Morwenoliaid Ynys Môn/Anglesey Terns Special Protection Area (SPA) on the basis of the potential for effects on the nesting habitat at the Cemlyn Bay lagoon on which the SPA Sandwich terns are dependent. However, this assessment would be unaffected by the proposed change as terns are not dependant on, or influenced by the perennial vegetation of stony banks qualifying feature. The appropriate assessment for birds (including Morwenoliaid Ynys Môn/Anglesey Terns Special Protection Area) has therefore not been considered further as this would remain as reported in the Shadow Habitats Regulations Assessment .

2.3.5 Although the appropriate assessment in the Shadow Habitats Regulations Assessment Report makes several references to the average peak number of vessels predicted to use the MOLF on a weekly basis, none of the quantitative assessments presented, including those referring to effects to marine mammals (from changes to underwater noise disturbance and the risk of marine vessel strikes) and seabirds (from changes to visual stimuli) take into consideration this value. Consequently, these assessments would be unaffected by the proposed change and would remain as reported in the Shadows Habitat Regulations Assessment Report . Despite this, the potential implications of the proposed change to these assessments on a qualitative basis is given further consideration below in relation to the corresponding assessment presented in chapter D13 of the Environmental Statement

2.3.6 The proposed change would not affect the overall number or type of marine vessels which would be using the MOLF and it would not affect vessel speed, pilotage or towage, therefore all the remaining assessments detailed within the Environmental Statement or Shadow Habitats Regulations Assessment Report are not considered to be affected by the proposed change and thus, the conclusions remain as reported in the DCO application.

2.3.7 Where relevant further comment is made as to the effects of the proposed change on the Shadow HRA in 2.4 below.

Other assessments

2.3.8 All other assessments submitted as part of the DCO application (e.g. Welsh Language Impact Assessment, APP-433; Equality Impact Assessment, APP-434 and Water Framework Directive Compliance Assessment, APP-444) would also remain unaffected by the proposed change and have therefore not been considered further.

2.3.9 The effects of the proposed change to the assessments listed in paragraph 2.3.2 above are summarised in Table 2-4, with further discussion provided below where relevant.

2.4 Topic assessments

Air quality

2.4.2 The assessment of emissions of pollutants to air arising from the Wylfa Newydd Project is presented in chapter D5 (air quality) of the Environmental Statement.

2.4.3 The air quality assessment uses information on baseline conditions (and predictions of future baseline conditions) to assess the impact of predicted increases in pollutant concentrations and deposition rates arising from marine vessels during construction of the Power Station. Effects were assessed at relevant sensitive human receptor locations (e.g. residential properties, footpaths and other locations to which members of the public would have access) and sensitive ecological receptor locations (e.g. a designated site such as a Site of Special Scientific Interest (SSSI) or a SAC).

2.4.4 Two construction scenarios were assessed in the Environmental Statement (year 2 and year 5), representing peak activity during two distinct stages of Main Construction. The proposed change only affects the year 5 scenario which represents the operational phase of the MOLF, and the peak construction phase of the Power Station. As explained in chapter D5 of the Environmental Statement, the year 5 scenario is used to represent the highest potential air quality effects during year 3 to year 9 of the construction programme.

2.4.5 Additional dispersion modelling work has been carried out to determine the effects of the proposed change to the air quality assessment presented in chapter D5 of the Environmental Statement for relevant sensitive human and ecological receptor locations. This information is summarised under the subsequent headings below.

2.4.6 The magnitude of effects (described as 'effect descriptors') from emissions of pollutants to air from combustion emissions is classified as 'large', 'medium', 'small' or 'negligible' adverse, whilst the overall significance of air quality effects is classified as 'significant' or 'not significant'. Further information about the air quality assessment criteria and the determination of significance

can be found in paragraphs 5.4.121 to 5.4.150 in chapter B5 of the Environmental Statement (APP-070).

Human receptor locations

- 2.4.7 The proposed change would not result in any perceptible difference in the maximum predicted concentrations of carbon monoxide (CO) and particulate matter (PM₁₀ and PM_{2.5}) (i.e. no change to the magnitude of change as a percentage of the air quality objective (AQO) value). Consequently, the effect descriptors would remain as negligible adverse at all receptors (R1 to R19, R20, R22 and R25) considered in the air quality assessment for year 5.
- 2.4.8 For sulphur dioxide (SO₂), there would be some relatively small changes in the 24-hour, one-hour and 15-minute mean concentrations as a consequence of the proposed change (between 0% to 5% of the AQO value). However, the increases would not lead to any changes to the effect descriptors, which remain as negligible adverse for all receptors (R1 to R19, R20, R22 and R25) considered in the air quality assessment for year 5. Total SO₂ concentrations remain well within the relevant AQOs (i.e. a maximum of 9% of the AQO for any of the three averaging periods).
- 2.4.9 For annual mean nitrogen dioxide (NO₂) concentrations, the proposed change would result in a 1% increase in the concentration relative to the AQO predicted at one of the long-term receptor locations (i.e. R1 to R17 where exposure is considered to occur over a long period). This would alter the effect descriptor from small adverse to medium adverse at R14. However, the total NO₂ concentration of 8.7µg/m³ would remain well within the annual mean AQO of 40µg/m³. With respect to annual mean NO₂ concentrations, the proposed change would also alter the effect descriptor from negligible adverse to small adverse at a further two receptor locations out of the 1,228 long-term human receptor locations modelled for the assessment.
- 2.4.10 As a consequence of the proposed change, the maximum total concentration of NO₂ at any of the long-term receptor locations (R1 to R17) would increase from 10.8µg/m³ to 10.9µg/m³, remaining well within the annual mean AQO of 40µg/m³. Air quality at the Site Campus would also remain at a good standard, with total concentrations also remaining well within the AQO (a maximum concentration of 21.2µg/m³).
- 2.4.11 For one-hour mean NO₂ concentrations, the proposed change would not result in any perceptible difference (i.e. no difference in the magnitude of change as a percentage of the AQO value in the maximum predicted concentration at both short-term human receptor locations (i.e. locations where exposure would be over a short period such as one hour) and long-term human receptor locations (i.e. locations where exposure would be over a long period such as one year). This result is due to other on-site sources being the main contributors to the peak one-hour mean NO₂ concentrations. The proposed change would however, result in some minor changes to the effect descriptors when considering all 1,228 modelled receptors, with seven additional receptors being classed as small adverse, instead of negligible adverse.

2.4.12 The effect of the proposed change on effect descriptors for NO₂ are set out in Table 2-1. As shown, the balance of effects remains as predominately negligible with consideration of the proposed change.

Table 2-1 Effect of the proposed change on the effect descriptors for NO₂ concentrations

Effect descriptor	Number of receptors experiencing predicted effects			
	Annual mean NO ₂		1-hour mean NO ₂ (99.8 th percentile)	
	Proposed change	Difference arising from proposed change	Proposed change	Difference arising from proposed change
Large adverse	0	0	1	0
Medium adverse	3	+1	1	0
Small adverse	43	+2	67	+7
Negligible adverse	1,182	-3	1,159	-7

2.4.13 As the proposed change would result in relatively small changes to the predicted concentration of pollutants to human receptor locations, this would not require any new embedded, good-practice or additional mitigation measures

Ecological receptor locations

2.4.14 Changes to air quality due to dust and emissions of NOx and SO₂ from plant, machinery and marine vessels could result in habitat degradation. Indirect effects, such as the reduction in quality of habitat for other receptors reliant upon it may also occur.

2.4.15 The air quality assessment in the Environmental Statement (chapter D5) identified three designated sites where the increase in NOx or SO₂ concentrations and associated nitrogen or acid deposition due to the Wylfa Newydd Project was such that further consideration was required as part of the terrestrial and freshwater ecology assessment in chapter D9 of the Environmental Statement (i.e. it could not be categorised as a negligible effect as part of the air quality assessment could not be concluded. These included:

- Tre'r Gof SSSI
- Cae Gwyn SSSI; and
- Cemlyn Bay SSSI/SAC.

2.4.16 The subsequent effect of the proposed change on the assessments of air quality changes at these sites is outlined in Table 2-4. The changes to the predicted maximum concentrations and deposition rates (where applicable), are discussed below.

2.4.17 With regards to NOx, SO₂ and the associated nitrogen and acid deposition, the proposed change would not require consideration of any new designated sites within the terrestrial and freshwater ecology assessment (chapter D9) (i.e. the air quality effect at all other sites remains as negligible).

Tre'r Gof SSSI

2.4.18 With the proposed change, the predicted process contribution² for annual mean NOx concentrations would increase from 14.6µg/m³ to 15.0µg/m³. The total NOx concentration of 23.9µg/m³ would remain within the critical level of 30µg/m³.

2.4.19 The proposed change would result in further exceedance of the 24-hour mean critical level, with NOx concentrations increasing from 102.8µg/m³ to 103.4µg/m³.

2.4.20 The proposed change would not result in a perceptible increase in the total nitrogen deposition although deposition rates would remain in exceedance of critical loads. Acid deposition would also increase from 0.13keq/ha/year to 0.16keq/ha/year, equating to a 2% increase in the total acid deposition rate.

Cae Gwyn SSSI

2.4.21 The proposed change would result in a small increase in nitrogen and acid deposition of 0.1kgN/ha/year and 0.1keq/ha/year, respectively.

2.4.22 Changes to all other pollutants arising from the proposed change would remain below the criteria requiring further consideration in the terrestrial and freshwater ecology assessment (chapter D9).

Cemlyn Bay SSSI/SAC

2.4.23 The proposed change would result in a small increase in acid deposition, with process contribution increasing from 0.03keq/ha/year to 0.06keq/ha/year.

2.4.24 Changes to all other pollutants arising from the proposed change would remain below the criteria for requiring further consideration in the terrestrial and freshwater ecology assessment (chapter D9).

Noise and vibration

2.4.25 The assessment of airborne noise and vibration disturbance arising from marine vessel movements for the Wylfa Newydd Project is presented in chapter D6 of the Environmental Statement. This assessment is based on noise modelling which examined the potential effect of marine vessel movements in two ways:

- as moving construction noise sources within the harbour and a contributor to total construction noise in the Wylfa Newydd Development

² This is the modelled concentration from the Wylfa Newydd Project emission sources included in the assessment.

Area. The proposed change could potentially affect this assessment and is discussed further below; and

- as contributors to total offshore construction vessel movements (up to 1.7 nautical miles from land) which is compared to the percentage change that would be required to lead to a perceptible increase in noise from marine vessel movements. This proposed change will not increase the annual number of vessel movements to or from the MOLF, and therefore the assessment set out in section 6.5.47 of chapter D6 of the Environmental Statement remains unaltered. This assessment concluded that MOLF vessel movements would be expected to increase shipping noise by less than 3dB, and that this is considered a negligible change in magnitude.

2.4.26 For context, it is noted that the minimum change in noise level that a trained ear can detect in controlled listening environments is generally taken to be 1dB. For long term changes in noise levels in uncontrolled environments, most people can only distinguish differences of 3dB or greater.

Construction noise in the Wylfa Newydd Development Area

2.4.27 Noise modelling has shown that the proposed change would result in a mean noise level increase of less than 0.06dB $L_{Aeq,1hour}$ at 120 of the closest properties to the Wylfa Newydd Development Area. The difference in noise levels predicted due to the proposed change are small and would be undetectable to a person. The noise generated from construction plant that will be operating within the Wylfa Newydd Development Area, will exert a controlling influence on the total noise levels at receptors.

2.4.28 The greatest increase at any property would be 0.8dB $L_{Aeq,1-hour}$ at Hen Blas, where night-time noise levels for months 31-33 of construction are predicted to increase from 41.9dB $L_{Aeq,1-hour}$ to 42.7dB $L_{Aeq,1-hour}$ because of the proposed change. A night-time noise level of 42.7dB $L_{Aeq,1-hour}$ is considered a small effect of minor significance. Without the proposed change, the daytime noise levels associated with months 22-24 and 31-33 of construction would also be considered a small effect of minor significance, and therefore the overall noise effect at this property will not change.

2.4.29 Analysis of the results at each property indicate that the small increases in noise levels will not alter the overall magnitude of effect at any property. Therefore, there will be no change to the significance of construction noise effects at any of the 120 nearest noise sensitive receptors due to the proposed change.

Marine Environment

Underwater noise from vessel movements

2.4.30 The predicted noise levels for vessels are low and not discernible above measured background at distances of 2.4km for medium vessels and 4.4km for large vessels. The impact ranges summarised in table D13-26 and table D13-27 (chapter D13) show that Permanent Threshold Shift (known as PTS)

and Temporary Threshold Shift (known as TTS) to harbour porpoise and pinnipeds in water from vessel movements is considered unlikely. With regards to behavioural effects for harbour porpoise, the assessment predicted only localised avoidance within 60m of large vessels and 10m of medium vessels. Predicted ranges show that behavioural effects for pinnipeds in water are unlikely. It has been suggested that the primary effect of vessel movements is the masking of biologically important sounds. However, most shipping generates low frequency sound below 1kHz and is therefore outside of the auditory range for most cetaceans and it is likely to be only detectable to pinnipeds. The effect to cetaceans is considered to be negligible and has not been considered further in the assessment.

- 2.4.31 With regards to underwater noise, it is the size of the vessel that is of importance rather than the frequency of vessel movements. Considering there will be no change in the size of vessels to be used it is considered that the conclusions of the assessment of no significant effect remain valid.
- 2.4.32 To further assess the potential effects of underwater noise disturbance to marine mammals the appropriate assessment, detailed in the Shadow Habitats Regulations Assessment Report), uses the underwater noise modelling results to predict the number of individuals and percentage of reference populations that could exhibit behavioural disturbance as a consequence of vessel movements. This assessment does not take account of the number of marine vessel movements or the frequency of noise disturbance effects and therefore the results presented in the Shadow Habitats Regulations Assessment Report would not be affected by the proposed change. Despite this, it is recognised that the proposed change could potentially increase the frequency of underwater noise disturbance from marine vessels, resulting in an increase in the number of individuals and percentage of reference populations potentially affected. However, given the size and temporary nature of noise disturbance effects from a single vessel movement, the proposed change is not considered to alter the outcome of the appropriate assessment as overall, the number of individuals and percentage of reference populations potentially affected would remain low.

Physical injury of marine mammals from vessel strikes

- 2.4.33 Prior to construction and on completion of the Marine Works, marine plant and vessels would be required to transit to/from the Wylfa Newydd Development Area. The numbers of vessels are small in comparison to the vessel density in the wider area of up to 25 vessels per week. Once on-site, much of the marine plant would be stationary for long periods of time or travelling at relatively slow speeds. Work boats and safety boats may travel at faster speeds but movement would generally be limited to the Wylfa Newydd Development Area. Marine mammals have been recorded in low abundance here and given the likely occurrence of other disturbance effects (e.g. underwater noise), displacement of individuals from the area is probable. The risk of vessel strikes from marine plant and vessels transiting to site and once on-site is therefore considered to be negligible.
- 2.4.34 During operation of the MOLF marine traffic would be comprised of primarily large slow-moving vessels required to transport general equipment, cement

and aggregate. The slow travelling speeds of these vessels means that the likelihood of marine mammal strikes is low. Therefore, the magnitude of change is predicted to be negligible and the effect on marine mammals from vessel strikes is negligible.

2.4.35 Despite there being an increase in the daily vessel movements, the total number of vessels using the MOLF over the whole construction programme would remain the same. The assessment demonstrated that although all types of vessels may collide with marine mammals, the most lethal and serious injuries are caused by large ships (e.g. 80m or longer) and vessels travelling at speeds faster than 14 knots. Considering there will be no change in the size of vessels used or their travel speed (10 knots), and that displacement of individuals from the area is probable due to other disturbance effects during construction, it is considered that the conclusions of the assessment of no significant effect remain valid.

2.4.36 To further assess the potential effects of marine vessel strikes, the appropriate assessment detailed in the Shadow Habitats Regulations Assessment Report used marine mammal density estimates for the Wylfa Newydd Development Area to predict the number of marine mammals that could potentially be at risk of colliding with marine vessels assuming avoidance rates of 90%, 95% and 99%. This assessment does not take account of the number of marine vessel movements or the potential frequency of collision risks, and therefore the results presented in the Shadow Habitats Regulations Assessment Report would not be affected by the proposed change. Despite this, it is recognised that the proposed change could potentially increase the risk of vessel strikes, increasing the number of individuals and percentage of reference populations potentially affected by physical injuries. However, given the slow vessel speeds and the likelihood of a single vessel strike occurring, the proposed change is not considered to alter the outcome of the appropriate assessment as overall, the number of individuals and percentage of reference populations potentially affected would remain low.

Changes to visual disturbance

2.4.37 Seabirds (including terns as well as other species such as Manx shearwater, *Puffinus puffinus*) exhibit relatively low sensitivity to vessel traffic ([RD2], [RD3]) and consequently, the proposed change would not result in discernible increase in visual disturbance to seabirds. This disturbance is unlikely to have more than minor effects on foraging or commuting behaviour, which would be inconsequential in terms of any population-level effect. Therefore, the proposed change would not alter the magnitude of visual disturbance effects to seabirds, remaining as reported in chapter 13 of the Environmental Statement and the Shadow Habitats Regulation Assessment Report.

Shipping and navigation

2.4.38 The proposed change would result in changes to the NRA (Environmental Statement appendix D15-1) for the operational phase of the MOLF, specifically with regards to the assessment of the frequency within which hazards would be likely to occur (Table 2-2).

2.4.39 Two additional hazards would arise due to the proposed change:

- adequate tugs may be unavailable to incoming vessels; and
- there may be increased non-attendance of boatmen.

2.4.40 The frequency of these two additional hazards arising from the proposed change would be low (≤ 2 each).

2.4.41 With the proposed change, there may be an increased risk during the operational phase of the MOLF, in that there could be no berth available to incoming vessels and therefore a requirement for more vessels to wait offshore for a berth to become available. This risk would be controlled by good practice mitigation measures described in chapter D15 of the Environmental Statement .

Table 2-2 Identified hazard frequency in the NRA for the operational phase of the MOLF

Cause	Extant frequency (4 vessel movements per day)	Proposed change (16 vessel movements per day)	Difference in frequency arising from proposed change
Human error	18	19	+1
Human error/fatigue – ship personnel	17	18	+1
Communication error – personnel	13	14	+1
Competence	9	10	+1
Human error/fatigue – port/marine personnel	5	6	+1
Language problems	4	5	+1
Failure to comply with Vessel Traffic Services/Local Port Services/Standard Operating Procedures instructions	2	3	+1
High traffic density	1	2	+1
Tugs – inadequate/unavailable	1	2	+1
Non-attendance of boatmen	0	1	+1

2.4.42 The proposed change would not alter any additional mitigation (control) measures outlined in table D15-3, chapter D15 of the Environmental Statement, other than increasing the frequency within which some of these controls are likely to be employed. Changes to additional mitigation (control) measure frequency arising from the proposed change are outlined in Table 2-3.

2.4.43 The two additional hazards outlined in paragraph 2.4.39 would be further controlled by the appointed local port services (still to be confirmed) and training of port/marine operations personnel.

Table 2-3 Identified additional mitigation (control) measure frequency for the NRA during the operational phase of the MOLF

Cause	Extant frequency (4 vessel movements per day)	Proposed change (16 vessel movements per day)	Difference in frequency arising from proposed change
Local Port Services – harbour control office	20	21	+1
Marine safety management system	16	17	+1
Port Marine Safety Code compliance	16	17	+1
Contingency plan exercises	11	12	+1
Port facility emergency plan	11	12	+1
Oil spill contingency plans	10	11	+1
Local Port Services broadcast (navigation and safety information)	10	11	+1
Pilotage services	10	11	+1
Training of port/marine operations personnel	9	10	+1
Availability of pollution response equipment	7	8	+1

2.4.44 Although some risk aspects would increase in frequency with the proposed change, with two additional hazards (see paragraph 2.4.39), these changes would not require any new embedded, good-practice, or additional mitigation measures, as the existing mitigation measures have already been applied to address other hazards.

Table 2-4 Likely new or different environmental effects

Document name	Application Reference Number	Chapter name/section name	New or different likely significant environmental effects	Material change/non-material change/no change
Environmental Statement, chapter D5	APP-124	Air quality	<p>Although some of the effects on specific receptors would change as a result of the proposed change, the magnitude of the changes would be small and the effect descriptors would remain as predominantly negligible adverse.</p> <p>Given the information presented in paragraphs 2.4.7 to 2.4.24, the proposed change would not result in new or different likely significant environmental effects in particular effects to human and ecological receptors due to:</p> <p style="padding-left: 40px;">emissions of pollutants to air; and deposition (ecological receptors only).</p> <p>Thus, there is considered to be no change to the air quality assessment, and the conclusions presented in chapter D5 of the Environmental Statement remain as reported.</p>	Non-material change

Document name	Application Reference Number	Chapter name/section name	New or different likely significant environmental effects	Material change/non-material change/no change
Environmental Statement, chapter D6	APP-125	Noise and vibration	<p>As demonstrated in paragraphs 2.4.27 to 2.4.29, there would only be a small increase in predicted at the properties closest to the Wylfa Newydd Development Area as a consequence of the proposed change.</p> <p>Thus, there is considered to be no new or different likely significant environmental effects to the assessment of noise and vibration and the conclusions presented in chapter D6 of the Environmental Statement remain as reported.</p>	Non-material change
Environmental Statement, D9	APP-128	Terrestrial and freshwater ecology	<p>Given the information presented in paragraphs 2.4.14 to 2.4.24, the proposed change would not significantly alter the terrestrial and freshwater ecology assessment, in particular effects to Tre'r Gof SSSI, Cae Gwyn SSSI and Cemlyn Bay SSSI/SAC due to changes to air quality.</p> <p>Tre'r Gof SSSI: Small increases in the total NOx concentration predicted to occur at this site as a consequence of the proposed change are not considered to result in new or</p>	Non-material change

Document name	Application Reference Number	Chapter name/section name	New or different likely significant environmental effects	Material change/non-material change/no change
			<p>different likely significant environmental effects and therefore would not alter the outcome of the assessment in chapter D9 of the Environmental Statement. Given the alkaline nature of the fen and its potential buffering capacity to acid deposition, increases in the predicted deposition as a result of the proposed change would not result in new or different likely significant environmental effects and therefore would not alter the outcome of the assessment in chapter D9 of the Environmental Statement</p> <p>Cae Gwyn SSSI: Small increases in nitrogen and acid deposition predicted to occur at this site as a consequence of the proposed change are not considered to result in new or different likely significant environmental effects and therefore would not alter the outcome of the assessment in chapter D9 of the Environmental Statement.</p> <p>Cemlyn Bay SSSI/SAC: Small increases in acid deposition predicted to occur at this site as a</p>	

Document name	Application Reference Number	Chapter name/section name	New or different likely significant environmental effects	Material change/non-material change/no change
			<p>consequence of the proposed change are not considered result in new or different likely significant environmental effects and therefore would not alter the outcome of the assessment in chapter D9 of the Environmental Statement, as the site is not considered to be sensitive to acid deposition.</p> <p>Thus, there is considered to be no new or different likely significant environmental effects from the change to the terrestrial and freshwater ecology assessment and the conclusions presented in chapter D9 of the Environmental Statement remain as reported.</p>	
Environmental Statement, D13	APP-132	The marine environment	<p>Despite an increase in the daily vessel movements, there will be no change in the size of vessels used, their travel speed or the total number of vessels using the MOLF over the construction period.</p> <p>As the size of vessel and travel speed are considered most important in determining effects from underwater noise and vessel strikes to marine mammals, the conclusions of the assessment of no significant effect remain as reported</p>	No change

Document name	Application Reference Number	Chapter name/section name	New or different likely significant environmental effects	Material change/non-material change/no change
			<p>As seabirds exhibit relative low sensitivity to vessel traffic, the proposed change is not considered to result in a discernible increase in visual disturbance to seabirds. The conclusions of the assessment of no significant effect therefore remains as reported.</p> <p>Thus, there are no new or different likely significant environmental effects to the marine environment.</p>	
Environmental Statement, chapter D15	APP-134	Shipping and navigation	<p>As outlined in paragraphs 2.4.38 to 2.4.44, the proposed change would not significantly alter the shipping and navigation assessment with respect to the frequency of hazards.</p> <p>Thus, there is considered to be no change to the shipping and navigation assessment, and no new or different likely significant environmental effects for shipping and navigation and the conclusions presented in chapter D15 of the Environmental Statement remain as reported.</p>	Non-material change

Document name	Application Reference Number	Chapter name/section name	New or different likely significant environmental effects	Material change/non-material change/no change
Environmental Statement, chapter D16	APP-135	Combined topic effects	<p>As outlined in paragraph 2.4.7 to 2.4.29 and this table, the proposed change would not significantly alter the assessment of air quality and noise and vibration effects to human and ecological receptors.</p> <p>Thus, the proposed change is not considered to have any cumulative or in-combination effect above that already assessed and would not result in any new or different likely significant effects. Therefore, the conclusions presented in chapter D16 of the Environmental Statement remain as reported.</p>	No change
Environmental Statement, chapter I4	APP-387	Intra-project cumulative effects	<p>As outlined in paragraphs 2.4.7 to 2.4.29, the proposed change would not significantly alter the assessment of air quality and noise and vibration effects to human and ecological receptors.</p> <p>Any changes to the air quality modelling results as a consequence of the proposed change, would not have any effect on the effect descriptors detailed in the intra-project cumulative assessment for those human receptors in close proximity</p>	Non-material change

Document name	Application Reference Number	Chapter name/section name	New or different likely significant environmental effects	Material change/non-material change/no change
			<p>to the Wylfa Newydd Development Area (R4-R8).</p> <p>The proposed change would result in no more than a 1% increase in the changes as a percentage of the critical level or critical load with regard to NOx concentrations or nitrogen and acid deposition at the three ecological receptors considered (Afon Wygyr Wildlife Site, ancient woodland (ID26051) and ancient woodland). This does not affect the air quality assessment outcomes and none of the ecological receptors considered in the intra-project cumulative assessment would exceed the criteria for requiring further consideration in the terrestrial and freshwater ecological assessment (chapter D9).</p> <p>Any change to the noise modelling results as a consequence of the proposed change, would not have any effect on the intra-project cumulative assessment for noise receptors.</p>	

Document name	Application Reference Number	Chapter name/section name	New or different likely significant environmental effects	Material change/non-material change/no change
			Thus, there is considered to be no new or different likely significant environmental effects to the intra-project cumulative effects assessment and the conclusions presented in chapter I4 of the Environmental Statement remain as reported.	
Environmental Statement chapter I5	APP-388	Inter-project cumulative effects	<p>As outlined in paragraph 2.4.7 to 2.4.29 and this table, the proposed change would not significantly alter the assessment of air quality and noise and vibration effects to human and ecological receptors.</p> <p>Thus, the proposed change is not considered to have any new or different likely significant environmental effects on the inter-project cumulative assessment and therefore the conclusions presented in chapter I5 of the Environmental Statement (APP-388) remain as reported.</p>	No change
Shadow Habitats Regulations Assessment Report	APP-050/051	Appropriate Assessment: habitats and species (terrestrial, freshwater and coastal) of SACs and Ramsar sites	Changes in air quality leading to small increases in acid deposition which would be predicted to occur at Cemlyn Bay SAC as a consequence of the proposed change would not be significant, as the site is not considered to be sensitive to acid deposition.	Non-material change

Document name	Application Reference Number	Chapter name/section name	New or different likely significant environmental effects	Material change/non-material change/no change
			Thus, there is considered to be no new or different likely significant environmental effects to the appropriate assessment and therefore the conclusions presented in the Shadow Habitats Regulations Assessment remain as reported.	

2.5 Schedule of engagements

Table 2-5 Schedule of engagements

Date	Event
28 June 2018	DCO application accepted for Examination
6 July to 13 August 2018	Relevant representations period
14 August 2018	<ul style="list-style-type: none"> Horizon notification to PINS of consultation on non-material change to vessel movements Horizon sends consultation document for non-material change to vessel movements to consultees specified below. Follow-up calls and meetings provided as required
28 September 2018	Consultation on non-material change to vessel movements ends (extra time allowed for August holiday period)
1 to 15 October 2018	Horizon considers responses received during consultation and finalises its request for a non-material change
17 October	Horizon submits a formal written request for a non-material change to the Examining Authority.
23 October 2018	Preliminary Meeting

List of specified consultees is set out below (with an * where responses were received):

- Welsh Government
- Natural Resources Wales*
- Isle of Anglesey Council
- Gwynedd Council
- Conwy County Borough Council
- North Wales Wildlife Trust*
- RSPB Cymru
- National Trust
- Betsi Cadwaladr University Health Board
- Public Health Wales
- Welsh Ambulance Service Trust
- North Wales Police*
- North Wales Fire and Rescue Service*
- National Grid

- Welsh Water
- SP Manweb plc
- Magnox
- Nuclear Decommissioning Authority
- North Anglesey Partnership
- Destination Anglesey Partnership
- North Wales Economic Ambition Board
- Joint Nature Conservation Committee
- Cyngor Tref Amlwch (Town Council)
- Cyngor Cymuned Cylch-Y-Garn (Community Council)
- Cyngor Cymuned Llanbadrig*
- Cyngor Cymuned Mechell*
- Cyngor Cymuned Llaneilian
- Cyngor Cymuned Rhosybol
- Talybolion Local Members
- Twrcelyn Local Members
- Royal National Lifeboat Institution
- The Maritime Coastguard Agency
- The Maritime Coastguard Agency – Holyhead
- Trinity House*
- The Marine Management Organisation
- The Crown Estate
- Marine Conservation Trust
- North West & North Wales Sea Fisheries Committee
- Local residents – via Horizon’s Near Neighbour Database which is used to keep local people up to date with activity on the Wylfa Newydd site. This approach is proportionate to the nature and scale of the proposed non-material changes, and is consistent with the historic approach for communications regarding onsite activity. In total, there are 898 residential addresses in the mailing area. *
- Persons with an interest in land – Horizon will consult all owners/occupiers, owners, occupiers and those with an interest in land or rights over land within the Main Site area (including those properties within the identified noise buffer area). Again, this approach is proportionate to the nature and scale of the proposed non-material changes, and is consistent with historic approaches (being the same

as the pre-application consultation on Additional Land carried-out in January 2018). In total, there are 188 properties identified.

In response to a local resident's request, Horizon also contacted:

- RYA Cymru Wales
- Holyhead Sailing Club
- North West Venturers Yacht Club
- Royal Anglesey Yacht Club
- Royal Welsh Yacht Club
- Caernarfon Sailing Club
- Conwy Yacht Club
- Conwy Marina Berth Holders Association
- North Wales Cruising Club

2.6 Schedule of consequential amendments to application documents

Table 2-6 Schedule of consequential amendments to application documents

Application document name	Application Reference Number	Section of document	Version to be amended	Description of amendment
Environmental Statement chapter D1: Proposed Development	APP-120		1.0	Project description of daily peak number of vessels
Environmental Statement chapter D5: Air quality	APP-124	5.5	1.0	Update to air quality modelling results
Environmental Statement appendix D5-2: Dispersion modelling of emissions to atmosphere arising from main site	APP-140	2.4	1.0	Update to vessel movement details and air quality modelling results
Environmental Statement chapter D6:	APP-125	6.5	1.0	Update to noise modelling results

Application document name	Application Reference Number	Section of document	Version to be amended	Description of amendment
Noise and vibration				
Environmental Statement chapter D13: Marine Environment	APP-132	6	1.0	Update to basis of design text
Environmental Statement appendix D15-1: Navigational Risk Assessment	APP-235	6	1.0	Update to NRA for increased daily peak vessel movements
Environmental Statement chapter I4: Intra-project cumulative effects	APP-392	4.2	1.0	Update to air quality modelling results
Environmental Statement appendix I4-2: Project-wide and WNDA development intra-project air quality assessment	APP-393	5	1.0	Update to air quality modelling results
Shadow Habitats Regulations Assessment Report	APP-050/051	8 9 10	1.0	Update to basis of design text

3 References

Table 3-1 Schedule of references

ID	Reference
RD1	The Planning Inspectorate. 2018. Advice Note 16: How to request a change which may be material. [Online]. [Accessed: June 2018]. Available from: https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2015/07/Advice-note-16.pdf
RD2	Garthe, S and Hüppop, O. 2004. Scaling possible adverse effects of marine wind farms on seabirds: Developing and applying a vulnerability index. <i>Journal of Applied Ecology</i> . 41, pp.724-734.
RD3	Furness, R.W, Wade, H.M. and Masden, E.A. 2013. Assessing vulnerability of marine bird populations to offshore wind farms. <i>Journal of Environmental Management</i> . 119, pp.56-66.

4 Appendix 1: Copies of "Neighbour News"

Newyddion i Gymdogion

RHIFYN 08 - Awst 2018



Wylfa Newydd – Diweddarriad i'n cymdogion agosaf

Ym mis Mehefin 2018, fe wnaethon ni gyflwyno ein cais am Orchymyn Cydsyniad Datblygu i adeiladu a gweithredu Wylfa Newydd, gorsaf bŵer niwclear newydd ar Ynys Môn.

Ers cyflwyno'r cais, rydyn ni'n cynnig newidiadau i ddau weithgaredd adeiladu penodol: ffrwydro creigiau a symudiadau llongau.

Er nad ydyn ni'n rhagweld effeithiau amgylcheddol sylweddol newydd yn wahanol i'r rhai a gyflwynir yn ein cais, hoffem glywed eich barn chi. Gallwch ddarllen mwy am yr hyn sy'n cael ei gynnig isod, yn ogystal â rhagor o fanylion ynglŷn â beth yw Gorchymyn Cydsyniad Datblygu.

Amserau ffrwydro

Yn ystod gwaith adeiladu Wylfa Newydd, bydd angen creigiau arnom i helpu i lenwi'r safle. I wneud hyn, rydyn ni'n bwriadu defnyddio craig a gafwyd drwy ffrwydro ac yna torri'r creigiau hynny ar y safle, yn hytrach na'u cludo o rywle arall.

Bydd angen ffrwydro hefyd fel rhan o'r gwaith cloddio dwfn ar gyfer y blociau unedau pŵer ac yn ystod gwaith adeiladu'r



Dweud eich dweud

Rydyn ni'n cynnal dwy sesiwn galw heibio lle gallwch chi ddod i siarad ag aelod o dîm Horizon a dod i wybod mwy am y newidiadau arfaethedig hyn.

Dewch i'n gweld ni **ddydd Mawrth 4 Medi**:

- 10am-1pm, maes parcio Cae Pwmp, Cemaes
- 2pm-5pm, maes parcio'r Douglas Inn, Tregele

Gallwch ddarllen y dogfennau technegol ar-lein yn: www.horizonnuclearpower.com/ymgyngoriad

Rhowch eich barn i ni yn ysgrifenedig drwy e-bost neu lythyr **erbyn 28 Medi 2018** - mae ein manylion ar gefn y daflen newyddion hon.

Newidiadau i amseriadau - parhad...



strwythur sugno dŵr oeri, twneli arllwys a ffosydd gwasanaethu, ac ar gyfer gwaith cloddio sych yr harbwr mewnol. Yn ogystal, mae'n bosibl y bydd angen cynnal gwaith ffrwydro er mwyn cael gwared â nodweddlion o dan y tir sydd bellach yn ddiangen, fel twneli dŵr a sylfeini adeiladau.

Roedd ein cais Gorchymyn Cydsyniad Datblygu yn cynnwys amseroedd arfaethedig ar gyfer gweithgarwch ffrwydro ar y safle. Ers hynny, rydyn ni wedi parhau i edrych ar y broses o adeiladu'r orsafr bŵer, gan gynnwys adolygu'r amserlen ffrwydro er mwyn lleihau unrhyw oedi i'r graddau mwyaf posibl mewn perthynas â rhaglen ehangach y Prosiect.

O'r herwydd rydyn ni'n cynnig newid amser y ffrwydro er mwyn iddo ddigwydd yn ystod yr oriau canlynol:

Dydd Llun i Ddydd Gwener rhwng 09.00 a 19.00, a dydd Sadwrn rhwng 08.00 a 13.00 (ond dim ffrwydro ar ôl y gwyll rhwng mis Mawrth a mis Medi). Ni fyddai gwaith ffrwydro yn cael ei gynnal ar ddydd Sul nac ar wyliau'r banc.

Symudiadau llongau yn y Cyfleuster Dadlwytho Morol

Byddwn yn cludo rhwng 60% a 80% o'n deunyddiau swmp ar y môr, gan ddefnyddio Cyfleuster Dadlwytho Morol wedi ei adeiladu'n arbennig ym Mhorth-y-Pistyll.

Rydyn ni'n cynnig newid y cyfyngiad dyddiol uchaf ar nifer symudiadau'r llongau yn y Cyfleuster Dadlwytho Morol yn ystod adegau allweddol. Byddai hyn yn ein galluogi ni i adennill unrhyw amser a gollir oherwydd y llanw, tywydd, gwahaniaethau mewn maint llwythau neu ddociau'n cau, ac

yn sicrhau bod y cyfleuster Dadlwytho Morol yn cael ei ddefnyddio yn y ffordd fwyaf effeithiol bosibl drwy gydol y cyfnod adeiladu.

Rydyn ni'n cynnig cynyddu'r terfyn dyddiol uchaf o bedwar symudiad bob dydd (dwy long) i **16 symudiad y dydd (wyth llon)**. Byddai nifer go iawn y symudiadau llongau bob dydd yn amrywio o un diwrnod i'r llall, sy'n golygu na fyddai llongau yn dod i'r Cyfleuster Dadlwytho Morol rai diwrnodau, ond y gallai fod yn llawn ar ddiwrnodau eraill.

Mae cyfanswm nifer y symudiadau llongau yr un fath â'r hyn a ddisgrifiwyd ac a aseswyd yng nghais Gorchymyn Cydsyniad Datblygu gwreiddiol Wylfa Newydd. Nid ydyn ni'n rhagweld y daw effeithiau amgylcheddol newydd i ganlyn y newid hwn.

Mae eich safbwytiau'n cyfri

Peidiwch ag anghofio rhoi gwybod i ni beth yw eich barn chi drwy ddefnyddio'r Rhadbost neu'r cyfeiriadau e-bost isod erbyn 28 Medi.

Ac os hoffech wybod am unrhyw agwedd arall ar Brosiect Wylfa Newydd, mae croeso i chi e-bostio neu ein ffonio ni.



Gwen Parry-Jones

Cyfarwyddwr Gweithredol, Datblygu Gweithrediadau Pŵer Niwclear Horizon

Diweddariad am yr ysgubor ystlumod

Fel y cynlluniwyd yn flaenorol, rydyn ni wedi dechrau adeiladu ysgubor ystlumod yng Nghemaes. Bydd y gwaith adeiladu yn cymryd hyd at 12 wythnos.



Beth yw Gorchymyn Cydsyniad Datblygu?

Gelwir prosiectau mawr fel Wylfa Newydd yn Brosiectau Seilwaith o Arwyddocâd Cenedlaethol. Maen nhw angen Gorchymyn Cydsyniad Datblygu, a Llywodraeth y Deyrnas Unedig sy'n penderfynu a ddylid rhoi caniatâd ai peidio. Mae Horizon wedi gwneud cais am Orchymyn Cydsyniad Datblygu i Ysgrifennydd Gwladol y Deyrnas Unedig dros Fusnes, Ynni a Strategaeth Ddiwydiannol.

Mae proses y Gorchymyn Cydsyniad Datblygu yn cael ei rheoli gan yr Arolygiaeth Gynllunio, a gallwch gysylltu â'r Arolygiaeth yn:

<https://infrastructure.planninginspectorate.gov.uk/cy/>

e-bostio Nlenquiries@pins.gsi.gov.uk neu ffonio 0303 444 5000.

Mae ein cais Gorchymyn Cydsyniad Datblygu ar gyfer Wylfa Newydd wedi ei rannu'n wyth cyfrol â chod lliw. Mae llawer o'r rhain yn cynnwys gwybodaeth fanwl a thechnegol helaeth, ond mae dogfennau i'w cael hefyd sy'n disgrifio datblygiad, nodau, effeithiau a manteision y Prosiect sy'n fwy hygyrch i'r holl ddarllenwyr.

Rydyn ni wedi cynhyrchu llyfrym defnyddiol dan y teitl 'Llywio drwy ein cais Gorchymyn Cydsyniad Datblygu' sy'n rhoi rhagor o fanylion. Mae modd i chi gael copi yn ein digwyddiadau sydd i ddod.

Cysylltu â ni

 ymholiadauwylfa@horizonnuclearpower.com

 www.horizonnuclearpower.com/hafan

 0800 954 9516

 Freepost WYLFA NEWYDD

 [@HorizonNuclear](https://twitter.com/HorizonNuclear)

 [@horizonnuclear](https://www.instagram.com/horizonnuclear)

Mae Horizon yn mynd ati o'i wirfodd i ddarparu cylchlythyrau i roi'r wybodaeth ddiweddaraf i'r gymuned am ddatblygiad y prosiect. Bydd unrhyw ddata personol a roddwch yn cael eu defnyddio ar gyfer hyn yn unig. Efallai y byddwn ni'n rhoi eich enw a'ch manylion cyswllt i drydydd partïon sy'n argraffu ac yn dosbarthu'r cylchlythyr hwn. Ond ni fyddwn yn defnyddio nac yn rhannu'r data mewn unrhyw ffordd arall. Rydyn ni o ddifri am ddiogel data. Os hoffech chi gael mwy o wybodaeth am y data sydd gennym amdanoch chi, sut rydyn ni'n eu defnyddio, sut rydyn ni'n eu cadw'n ddiogel a sut i'w cywiro neu eu dileu, [cysylltwch â ni: dataprivity@horizonnuclearpower.com](mailto:cysylltwch@horizonnuclearpower.com)

Neighbour News

ISSUE 08 — August 2018



Wylfa Newydd – update for our nearest neighbours

In June 2018, we submitted our application for a Development Consent Order (DCO) to build and operate Wylfa Newydd, a new nuclear power station on Anglesey.

Since our submission we are proposing amendments to two particular construction activities: rock blasting and vessel movements.

While we are not predicting any new significant environmental effects from those presented in our application, we would like to hear what you think. You can read more about what's being proposed below, as well as further details about what a Development Consent Order is.

Blasting timing

During the construction of Wylfa Newydd, we will need rock to help level the site. To do this, we have proposed to use rock obtained from blasting that is then crushed on site, rather than transporting it from elsewhere.

Blasting will also be needed as part of the deep excavations for the power unit blocks and during the construction of the



Have your say

We're holding two drop-ins where you can come and speak with a member of the Horizon team and find out more about these proposed changes.

Come and see us on **Tuesday 4 September** at:

- 10am-1pm, Cae Pwmp car park, Cemaes
- 2pm-5pm, Douglas Inn car park, Tregele

You can read the technical documents online at: www.horizonnuclearpower.com/consultation

Please give us your views in writing by email or letter **by 28 September 2018** - our details are on the back of this newsletter.

Continued over the page

Changes to timings continued...



Cooling Water Intake, outfall tunnels and service trenches, and for the dry excavation of the inner harbour. Blasting may also be required for removing redundant buried features such as water tunnels and building foundations.

Our DCO application included proposed times for blasting activity on the site. Since then we've continued looking at the construction of the power station, including reviewing the blasting schedule to minimise any potential risks to the wider Project programme.

As a result, we're proposing changes to the timing of the blasting so that it would take place during the following hours:

Monday to Friday between 09.00 and 19.00, and Saturday between 08.00 and 13.00 (with no blasting after dusk between March and September). There would still be no blasting on Sundays and Bank Holidays.

Vessel movements at the MOLF

We will bring between 60% and 80% of our bulk materials in by sea, using a specially constructed Marine Off-Loading Facility (MOLF) at Porth-y-Pistyll.

We are proposing to change the upper daily limit of vessel movements to and from the MOLF at key periods. This would allow us to recover time following delays caused by tides, weather, varying load sizes or dockside closures, ensuring the MOLF is used most effectively throughout construction.

What is a 'DCO'?

Large projects like Wylfa Newydd are known as Nationally Significant Infrastructure Projects (NSIPs). They require a Development Consent Order (DCO) that is determined by UK Government. Horizon has applied for a DCO from the UK Secretary of State for Business, Energy and Industrial Strategy.

The DCO process is managed by the Planning Inspectorate and you can contact them at: <https://infrastructure.planninginspectorate.gov.uk/>, email Nlenquiries@pins.gsi.gov.uk or call 0303 444 5000.

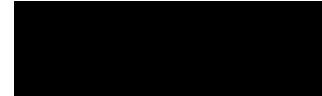
We are proposing to increase the upper daily limit from four movements per day (two vessels) to **16 movements per day (eight vessels)**. The actual number of daily movements throughout the construction programme would vary from day-to-day, meaning that some days the MOLF may be used to its full capacity, while on other days it may receive no vessel deliveries at all.

The total number of vessel movements remain the same as described and assessed in the original Wylfa Newydd DCO application. We don't predict any new environmental effects from this change.

Your views count

Don't forget to let us know your views using the Freepost or email addresses below by 28 September.

And if you'd like to know about any other aspect of the Wylfa Newydd Project, please feel free to email or call us.



Gwen Parry-Jones
Executive Director, Operations Development
Horizon Nuclear Power

Bat barn update

As previously planned, we've started to build a second bat barn in Cemaes.

Construction will take up to 12 weeks.



Our DCO application for Wylfa Newydd has been broken down into eight colour-coded volumes. Many of these contain extensive detailed and technical information, but there are also documents describing the Project's development, aims, impacts and benefits that are more accessible to all readers.

We've produced a handy booklet called 'Navigating our Development Consent Order Application' that explains more. You can pick up a copy at our upcoming events.

Getting in touch



wylfaenquiries@horizonnuclearpower.com



www.horizonnuclearpower.com



0800 954 9516



Freepost WYLFA NEWYDD



@HorizonNuclear



horizonnuclear

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5 Appendix 2: Copies of responses received during consultation

From: NWWT - 28-09-2018

Received: 2018-09-28T00:53:04Z

To: WylfaEnquiries@Horizonnuclearpower.com; wylfaenquiries@horizonnuclearpower.com;

Cc:

Subject: Consultation on proposed non-material amendments 1) changes to timings for blasting on site 2) changes to vessel movements

Wylfa Enquiries

Further to your consultation on the two proposed non-material amendments: -

- Changes to timings for blasting
- Changes to vessel movements

I am writing via this email to register North Wales Wildlife Trusts concern and lack of agreement to the proposition that these changes are non-material and do not alter the nature and conclusions of the Environmental Statement and the shadow Habitats Regulations Assessment. NWWT recently submitted our detailed comments to NRW on the Permits and Marine Licences and so have scrutinised both the ES, the project activities and the shadow HRA along with the relevant Codes of Construction/Operation Practice and have found many areas which cause concern. Those concerns have particular relevance to the topics under consideration in this consultation. The figures and detail of Marine Licence Project Description and Activities have been referred to where necessary, as in some cases they provide a slightly greater level of understanding of the nature of the development than the DCO project description ES A2 – Project overview and introduction to the developments. This is particularly in relation to the marine works and consequently the operation of the harbour (MOLF) and vessel movements.

CHANGES TO VESSEL MOVEMENTS

Uncertainty over materials' derivation, delivery methods and calculation of total vessel movements

There is a high degree of uncertainty about what materials can be derived on site and if they can't whether they will be delivered via sea or road. The projects description for the Marine Licence demonstrates uncertainty in a number of areas: -

- temporary access ramp materials either from off or on site. Delivery by road or sea.
- temporary barge berth constructed from either site won or imported materials. It is not stated whether imported materials would be delivered by road or sea
- the CWS coffer dam incorporating temporary causeway. Sheet wall piles and tubular piles to be delivered by road or sea.
- drainage pipes to be delivered by road or sea.

- Cooling water intake coffer dam “the steel piles, bracing materials **and fill material** will be delivered to site by sea and/or by road” (my emphasis).
- Temporary waste water outfall “rock foundations, pipeline and concrete mat and other materials” will be delivered by sea or road.
- The temporary waste water outfall will be dismantled and either used on site or removed off-site to a licensed tip. It is not clear if the off-site location might be the Holyhead Disposal site which would require further vessel movements
- The core of the western breakwater will be materials derived from the Power Station Site. However, the pre-cast armour units and the rock underlay will be transported to site by sea or from land.

The basis for the impact assessment has been made on 60 – 80% of deliveries being made from sea, but with the level of uncertainty indicated above it is unclear whether a **total figure** has been calculated of the hypothetical maximum number of deliveries and what therefore may entail the worst case of 80%.

The non-material amendment which has now been submitted confounds the situation, as the maximum number of boat movements/day is to be raised from 4 (equivalent 2 vessels) to 16 (equivalent 8 vessels). Horizon indicates that this will not alter the **total** number of vessels, but a total figure appears not to have been accurately calculated (cf discussion at 3.2.2 of Biosecurity Risk Assessment Strategy Report and supporting documents [RD17] & [RD18]¹): -

“Hitachi-GE Nuclear Energy Ltd. has produced a report (Transportation and Logistics Study CPJ-UW-A408) detailing transportation plans for equipment and materials required for construction [RD17]. The report aims to identify the transport modes and estimated number of vessels required. The details given in [RD17] are not final; further considerations are required. [RD17] should therefore be taken as the best estimate of logistical implications at the time of the report and is subject to change [RD18].”

My emphasis From paragraph 3.2.2 of Biosecurity Risk Assessment Strategy Report

doc ref ML-OTH-03-BSRA for the Marine Licence

The Transport & Logistics Study report [RD17] and its accompanying caveats [RD18] do not appear to be referred to in any of the submitted DCO documents or the Environmental Statement. Therefore this level of uncertainty does not appear to have been replicated in modelling for example in relation to air emissions. In fact, Appendix D5.02 (Main Site Construction Phase Air Dispersion EIA – Final Modelling Report) simply states that “*Horizon provided the number of marine vessels/types and MOLF construction plant on a monthly basis for each of the 2020 (when the MOLF is undergoing construction) and 2023 (when the MOLF is operational) construction years*”, with no qualification to represent any estimated upper or lower limits or referencing of the Transport & Logistics caveats. Given Horizon’s own self-acknowledged estimates of vessel movements it is highly likely that the proposed non-material amendment change could result in considerably more vessel movements than was initially considered or modelled within the ES chapters.

Air Quality

- The Marine Works sub-CoCP indicates (7.3.2) that additional air quality modelling may be needed to develop an air quality control protocol and the assumptions based in the modelling report (D5-2) will also be altered now by the non-material amendment. This will change, as a starting point, the predicted total one hour mean nitrogen dioxide values, but may also result in changes to the total annual mean levels depending on the distribution of deliveries across the year and/or the number of vessels increase in totality. The supporting document of the non-material amendment provides only a simple statement to indicate that the models have been re-run and that no significant change resulted. This is not sufficient in our view.
- The Tables in ES Chapter D5 would also need to be adjusted for short-term changes in NOx, nitrogen deposition and acid deposition for Year 2 harbour (MOLF) construction (and potentially Y5) depending on how the mix of changes in vessel rates is distributed over the construction period.
- Given these results it would also alter the illustrations in the ES figures D5-7 – D5-10 and there will be a considerably greater magnitude of change over the current baseline levels. It is of note that a baseline levels ‘temperature’ plan is not provided in a visual representation, although the ES acknowledges that the baseline is relatively broad brush.
- ES Appendix B5-2 bases statements on the conclusions of a report [RD6 CEH report] that is not referenced in the B5-2 documents list and was not available for review. This is important as there appears to be little understanding of why the critical load for Cemlyn Bae SAC was changed from 8 KgN/ha/year to 20 and whether this includes only the terrestrial vegetated habitats rather than those of the saline lagoon itself. Therefore no conclusions on the Report’s veracity can be provided by the consultees and cannot be commented on in relation

to the proposed non-material amendment. Additionally, this appendix which defines the critical loads for ecological receptors does not include Tre'r Gof in Table 4-1.

- It is unclear if Trwyn Pen Carreg and Arfordir Mynydd y Wylfa – Trwyn Penrhyn Local Wildlife Sites' critical loads have considered the lichen/bryophytes and the nationally significant CHEG fungi as critical receptors to changes in air quality. APIS (Air Pollution Information Service) habitat statistics do not include a habitat defined by coastal grassland heath matrix but the description for dwarf heath communities the mosses, lichen and bryophyte element of habitat is recognised as being most susceptible to nitrogen deposition. Given the importance of the lower plant element in the coastal communities a lower critical threshold may need to be considered. For example, in lichen and moss dominated habitats the loads can be as low as 5 or 8KgN/ha/year (APIS search term 'lichen & moss' advanced search critical load).
- NWWT raised concerns in their Marine Licence response regarding the effectiveness of the proposed monitoring and mitigation in relation to the CoCP and have suggested that further consideration needs to be given to a number of areas relating to shipping movements, such as alternative power sources when vessels are docked rather than operating at 80% engine capacity. This is even more pertinent given the proposed quadrupling of vessel movements.

Shipping Movements

- Little information appears to be available within the DCO or the Marine Licence application on the matter of shipping movements in and out of the harbour (MOLF) or their approach to it. Nor does ES chapter D15 (Shipping & Navigation) provide any additional information on shipping routes for deliveries or disposal of dredging materials. This is a critical consideration now a four-fold increase in vessel movements is being considered. This in our view is not only in relation to ecological receptors but also in terms of the Navigational Risk Assessment (Marine Licence) for the project, however, this element is entirely outside our remit.
- There appears to be little consideration of the consequences of a four-fold increase in large sea-going ships (up to 100m long) crossing the Sandwich tern foraging route as the birds are less than 1km to 1.5km from the breeding colony. The work within the ES and its appendices show that the majority of Sandwich terns leave the breeding colony to fly east across Porth-y-Pistyll, the location of the new harbour (MOLF) and breakwaters and all vessels entering the harbour will bisect the tern's foraging trajectory.
- Changes resulting from the non-material amendment will result in one vessel on average passing in or out of the harbour (MOLF) every 1.5 hours, or alternatively ships being grouped to all passage on an adventitious tide. This is opposed to the ES consideration of one vessel on average every 6 hours. This difference is considered to add significantly to the levels of disturbance to the terns both alone and in combination with other impacts associated with the DCO. This is within the context that the shadow HRA has not demonstrating beyond reasonable scientific doubt that there will be no Adverse Effect on Site Integrity. This is an opinion that is not only held by NWWT but also by the SNCN in their responses to the DCO and therefore this matter should be investigated more thoroughly in relation to this four-fold increase in the number of vessels entering and leaving the harbour within any 24-hour period and the associated risks to the breeding tern colony.
- NWWT do not feel that there had been sufficient consideration, within the original ES, of factors to reduce and mitigate for these impacts and proposed controls on delivery routes, timings or break out routes from the Holyhead Separation Lanes were poorly developed to deal with ES' original conclusions. It is our opinion that there is a greater imperative to consider this matter in relation to the proposed changes to vessel movements.

CHANGE TO TIMING OF BLASTING

NWWT have consistently disagreed with the assessment of noise impacts and tern behavioural responses as presented by Horizon in the ES and the SHRA. It is our view that conclusions cannot be drawn 'beyond reasonable scientific' regarding this either as an isolated disturbance factor, or as a cumulative factor in conjunction with other impacts. These concerns are shared by NRW.

The proposed changes to the blasting operations increases the frequency/periodicity of the blasting in any given day and so this along with the changes to vessel movements is highly likely to result in a synergistic effect in-combination. For example, there could feasibly be blasting for the majority of the tern's daylight foraging time - a 66% increase in week day times when blasting can occur. This could occur and be combined with the maximum of 16 vessel movements – a four-fold increase over the initial assessed levels of disturbances. This is not an inconsiderable alteration to the level of disturbance the breeding population will be subject to.

Therefore, in this consultation response NWWT has also considered the adequacy of how Horizon proposes to control activities to manage & reduce impacts at the Anglesey Tern SPA.

- The main features of the noise mitigation for terns is laid out in the sHRA and is summarised in the Executive Summary (1.1.27 – 1.1.38). In this document blasting constraints are proposed during the ‘establishment period’ (55dBBLAFmax – para 1.1.35), taken to be 15th April for 4 weeks 13th May, and at a higher level (60dBBLAFmax – para 1.1.30) for the remainder of the breeding season, until 15th August.
- During the TCPA negotiations and the recently granted Site Preparation & Clearance proposals the breeding season for the tern colony in its entirety - including black-headed gull breeding - has been conditioned as 7th March to 15th August. This inconsistency needs to be addressed and it is suggested that Horizon undertake a clear review of the sHRA protocol as there are some major changes that may be required to the proposed approach in order to make it satisfactory.
- Points that it is suggested should be considered given the increased in-combination disturbance risks are: -
- Considering the colony ‘establishment period’ – the Marine Licence CoCP indicates (para 8.3.3) that the April 15th start date will be guided by information from NWWT on when the first terns/black-headed gull typically arrive to set up the colony (ML CoCP 8.8.3). This information has been provided to Horizon sometime ago and no analysis appears to have been provided by them to justify this date.
- It is suggested that the start date should be extended to include the period when the black-headed gulls arrive and breed, as they are acknowledged to be a key part of the defensive strategy for Sandwich tern colonies (Strangford Lough 2017 and Cabot & Nisbet). NWWT have considered their data and the black-headed gull colony formation would be encompassed to a large extent by the 7th March date as agreed within the TCPA conditions.
- Observation of aerial display or other cut-offs such as 50% of expected numbers of Sandwich tern are not considered useful markers or thresholds. Firstly, Cabot & Nisbet indicate that Sandwich tern often display, court and mate away from the colony breeding site. Additionally, a figure of what might be the ‘expected number of Sandwich terns’ is undefined and will vary from year to year, or if the JNCC designation figures were to be used rather than a 5-year average. It also takes no account of late arrivals due to a slow season due to weather or for late influxes of birds potentially from failed breeders at other colonies.
- The SPA is designated not only for its Sandwich terns but also for common, Arctic and Roseate terns. From analysis of the Cemlyn data common & Arctic terns do not begin to arrive until the end of April and although they tend to settle and nest quickly the first birds to be seen on nests are all after the 13th May proposed cut-off for the ‘establishment period’ in the 4 years of Cemlyn data analysed. Significant effort is being undertaken under the *Life* Project to establish breeding Roseate terns at Cemlyn SPA and this species breeds later even than common tern (Cabot & Nisbet). The proposed mitigation for noise with the current ‘establishment period’ will not capture the early breeding phase of any of the other qualifying species of the Anglesey Terns SPA.
- It is very unclear why the ‘establishment period’ is limited to only 4 weeks as the incubation period for Sandwich terns is 26 – 28 days (ie 4 weeks Cabot & Nisbet) and the breeding colony will be vulnerable to disturbance and breeding failure for a considerably longer period, given that an adult will ‘brood’ young chicks and one adult will predominantly be responsible for providing small prey items for a period of time after hatching, until the chicks can be left and larger prey items can be consumed.
- The setting of two dB levels (55 & 60) over the breeding season is also questioned. What appears to be the most pertinent driver within the noise protocol is that “*any further constraints in blast size is likely to prevent any meaningful work on the site*” (sHRA 1.1.36). It is also speculated that Horizon have tried to obviate the restrictions already proposed by an increase in the number of blasting opportunities in a day.
- The effectiveness of monitoring is also in question.

In relation to marine mammals there is a similar matter in relation to periodicity of blasting activity. However, more importantly NWWT question the effectiveness of the proposed noise safeguards (MMO & PAM) in the CoCPs when blasting operations and the necessary observation period for marine mammals could now clearly conflict with periods of dusk/dawn and more often with bad light associated with bad weather in conjunction with sunrise/sunset.

Whilst a review of the mitigation/control measures does not appear to have been warranted by Horizon, it is clear that the alteration to the blasting and resulting acoustic landscape needs careful consideration against the proposed controls in order to ensure that they are still fit for purpose. If as suggested above, changes are necessary to the

proposed mitigation such as that provided in the SHRA in relation to terns and/or in CoCPs then this would need to be considered as a material matter and appropriate amendments to the DCO proposed.

I look forward to receiving Horizon's amended approach to these matters, in particular, a more significant review of the mitigation and control measures which can be achieved to reduce the impacts of these changes. NWWT reserve the right to draw the ExA to our opinions in relation to these matters where they overlap with evidence that will be presented to the DCO Examination.

Regards

Footnote ¹ [RD17] HNGE. 2016. *Transport and Logistics Study*. Document ID: A63-1505-0001-00001. Document No. CPJ-UW-A408 revision 1 and [D18] Horizon. 2016. *HGNE Transport and Logistics Study 2016* report caveats. DCRM Ref Number: HNP-S9-SDT-REP-00093 revision 0.1.)

**Biodiversity Planning
On behalf of North Wales Wildlife Trust**

Address: 26 Lower Lane, Chinley, High Peak, SK23 6BD

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From: LR1 - 26-09-2018

Received: 2018-09-26T11:24:45Z

To: WylfaEnquiries@Horizonnuclearpower.com; wylfaenquiries@horizonnuclearpower.com;

Cc:

Subject: Marine Vessel Movements - Wylfa Newydd

Dear Wylfa Enquiries,

With the feedback date of 28th September approaching I wish to pass on the following comments re Marine Vessel Movements. Thank you for arranging for a member of Horizon staff to meet me at Tregele and to pass on a paper copy of responses to my original questions (copied below). Unfortunately, despite sending two emails the electronic copy that was promised with further comments has not yet arrived.

Can I make it clear that in the event of Horizon's DCO application being successful and Hitachi's final investment decision being in favour of the building of Wylfa Newydd I am fully supportive of bringing the majority of bulk materials by sea.

However, as a recreational boat user I do have some comments on the details that are currently available in both the DCO and the request for non-material change (RfNMC).

I welcome Horizon's answer to questions 3 that they will respond to requests for information regarding vessel movements. If this is Horizon's intention it is not clear in the relevant DCO / RfNMC documentation and from a safety point of view Horizon should at least consider a more proactive system.

I also welcome the clarification in response to question 7 on the proposed routes between the MOLF and the Holyhead North spoil ground that avoids the inshore passage.

I remain to be convinced that Horizon have fully appreciated the frequency that recreational boats, both sail and power, use the route close inshore along the north coast of Anglesey. The use is predominately seasonal, often but not exclusively at weekends, usually but not always during daylight hours and the times of high or low water at Carmel Head influence passage plans. In addition the tidal stream can run at up to 5 knots at springs.

It is disappointing to see little or no direct engagement with the RYA, RYA Cymru Wales or the local sailing clubs before the submission of the DCO / RfNMC. Potentially important issues such as the location of 'mooring buoys' during MOLF construction (15.5.20 in document 6.4.15), the extent and purpose of the proposed 'safety zone' and the likely split of daytime / night time ship movements could have been discussed and potentially resolved.

Finally, the response to question 5 suggests that due to some ships requiring up to 2 tugs Horizon's figures for the total number of vessel movements in and out of the MOLF may be underestimated.

Regards

ORIGINAL QUESTIONS

Dear Wyfa Enquiries,

Could you please supply answers to the following questions so that I can decide if I wish to comment on Horizon's proposed changes to Marine Vessel Movements. I am a berth holder at Dinorwic Marina. Like many other recreational sailors I navigate the inshore passage at Carmel Head passing reasonably close to Wylfa Head and then on to Point Lynas (and vice versa) on a reasonably regular basis during the summer sailing season.

Q1. Am I correct in assuming that the intention is for the MOLF harbour to potentially have vessel movements 24hrs/day, 7days/week, 52weeks a year?

Q2. Are there any tidal restrictions for entry to, egress from or berthing within the MOLF harbour.

Q3. Will the Local Port Service (LPS) respond to VHF calls from mariners intending to make passage in the vicinity of the MOLF harbour to advise on vessel (ship and tug) movements? What VHF channel do the LPS propose using?

Q4. There is a reference in document 6.4.15 to mooring buoys. What are the approximate Latitude and Longitude positions of these mooring buoys?

Q5. How many tugs will be needed to assist each vessel when entering or leaving the harbour? Will all vessels require tug support? At approximately what Latitude and Longitude position will the tugs rendezvous with incoming vessels? At approximately what Latitude and Longitude position will the tugs release the vessels for onward passage?

Q6. There is a reference in document 6.4.15 to a safety zone. What will be the Latitude and Longitude of the corners of the safety zone?

Q7. Will some of the bulk material vessels and/or non divisible load barges be on passage from Holyhead and if so which passages at Carmel Head are they intending to use?

Q8. Should this increase in daily ship movements be approved by the planning inspectorate will the increased flexibility that will be available enable the applicant to consider suspending ship movements during summer weekends or during one off events such as the Round Anglesey Yacht Race?

I have also noticed some errors in the following documents.

Document 6.4.15

"15.3.8 There are a number of cardinal marker buoys to the east of Wylfa Head marking where rocks are close to the surface, and also to the west marking The Skerries."

The sentence would be correct if Carmel Head was substituted for Wylfa Head.

Document Wylfa Newydd Project Request for Non-Material Change no.2 Marine Vessel Movements

2.3.9 The effects of the proposed change to the assessments listed in paragraphs 2.3.2 and Error! Reference source not found. above are summarised in REF_Ref516641418 \r \h Table 2-4, with further discussion provided below where relevant.

I am not completely sure which paragraphs are referenced in 2.3.9 above.

I would also suggest that the following organisations should be consulted on these proposed changes.

Holyhead Sailing Club
North West Venturers Yacht Club
Royal Anglesey Yacht Club
Royal Welsh Yacht Club
Caernarfon Sailing Club
Conwy Yacht Club
Conwy Marina Berth Holders Association
North Wales Cruising Club

Regards

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Horizon Nuclear Power Ltd
Sunrise House
1420 Charlton Court
Gloucester Business Park
Gloucester
GL3 4AE

28 September 2018

Dear Sir/Madam,

PLANNING INSPECTORATE REFERENCE: EN10007

RE: WYLFA NEWYDD PROJECT – REQUEST FOR NON-MATERIAL CHANGE

1. INTRODUCTION

- 1.1. Thank you for your letter dated 14 August 2018 inviting Natural Resources Wales (NRW) to provide representations on Horizon Nuclear Power's (HNP) request for non-material change to the Development Consent Order (DCO) application.
- 1.2. We note that the consultation comprises the following documents:
 - Info Sheet: Proposed Changes to Blasting on Site (August 2018)
 - Technical Note: Request for Non-Material Change no.1 – Blasting Strategy (August 2018)
 - Info Sheet: Proposed changes to vessel movements (August 2018)
 - Technical Note: Request for Non-Material Change no.2 – Marine Vessel Movements (August 2018)
- 1.3. NRW provide the representations below with respect to the proposed request for non-material change in relation to blasting (comments 2.1 to 2.8) and marine vessel movements (comments 3.1 to 3.6). Planning Inspectorate's Advice Note 16 (*Advice Note Sixteen: How to request a change which may be material*, March 2018) states in paragraph 2.1 that whether a proposed change would be considered to be a material change “*is a question of planning judgment which may be based on criteria including, for example, whether the change would generate a new or different likely significant environmental effect(s)*”. This is ultimately a judgment for the Examining Authority however NRW provides the advice below in respect of the proposed amendments.

2. BLASTING STRATEGY

2.1. Paragraph 1.14 of the Blasting Strategy states that “*the non-material change proposed relates to the time frame within which blasting would be permitted to occur. Horizon is seeking to extend the weekday hours for blasting from between 10.00 and 16.00, to between 09.00 and 19.00, and Saturday blasting from between 10.00 and 13.00, to between 09.00 and 13.00*”. We also note paragraph 2.7.3 which states that “*there is no increase in the number of blasts which would be required, and the blasting vibration limits remain unaltered*”.

2.2. NRW have the following comments to make on the Topic Assessments in section 2.7 of the Blasting Strategy.

- *Terrestrial and Freshwater Ecology*

2.3. NRW note that European and nationally protected species (including bats and otters) are present within the Wylfa Newydd Development Area and could potentially be affected by noise and visual disturbance as a result of the construction works. The Environmental Statement (ES) and supporting appendices submitted as part of the DCO proposes mitigation measures to avoid and reduce impacts on protected species.

2.4. NRW agrees that the proposed change is not likely to result in new or different likely significant environmental effects on European and/or Nationally Protected Species.

- *Landscape and Visual*

2.5. Paragraph 2.7.8 states that the change to allow extended blasting hours “*remains within the wider Main Construction working hours outlined in the Main Site Power Station Sub Code of Construction Practice*”. Paragraph 2.7.8 also states that no additional lighting will therefore be required.

2.6. The Wylfa Newydd Project is located partly within the Ynys Môn / Anglesey Area of Outstanding Natural Beauty. NRW advises that the proposed change is not likely to result in new or different likely significant environmental effects on the Ynys Môn / Anglesey Area of Outstanding Natural Beauty.

- *Morwenoliaid Ynys Môn / Anglesey Terns Special Protection Area (SPA)*

2.7. Paragraph 2.7.15 of the Blasting Strategy states the proposed change does not affect the assessments undertaken in D13 of the ES and the Shadow Habitats Regulations Assessment (HRA). It is also stated that no new or different likely significant environmental effects are generated as a result of the change. NRW agree that no new or different likely significant environmental effects are generated by the proposed change.

2.8. Please note however, that NRW does not agree with the conclusions of the assessments in D13 and the Shadow HRA with respect to the Anglesey Terns SPA. As detailed in NRW's Relevant Representations, we do not consider that the evidence and mitigation presented in the Shadow HRA demonstrates that noise and vibration (including partly as a result of blasting) associated with the construction phase will not have adverse effects on the sandwich, arctic and common tern populations at the Cemlyn colony. NRW considers that adverse effects on the SPA (relating to sensitivity of sandwich, arctic and common terns to construction noise) cannot be ruled out. The proposed change has the potential to increase the risk of disturbance to the tern colony. As detailed above, and for the purpose of this consultation specifically, NRW agree that no new or different likely significant environmental effects are generated by the proposed change, however NRW does not agree with the conclusions of the assessment with respect to the impacts on the Anglesey Terns SPA and this should be addressed.

3. MARINE VESSEL MOVEMENTS

3.1. Paragraph 1.1.4 of the Marine Vessel Movements document states that "*the non-material change proposed relates to the upper daily limit of vessel movements to and from the Marine Off-Loading Facility (MOLF). Horizon is seeking to increase the upper daily limit from four movements per day (two vessels) to 16 movements per day (eight vessels) within the total vessel movements described and assessed in the Wylfa Newydd DCO application*".

3.2. NRW have the following comments to make on the Topic Assessments in section 2.4.

- *Air Quality*

3.3. Paragraphs 2.4.14 – 2.4.24 and Table 2-4 describe the possible effects of increased emissions of the peak marine vessel movements on Tre'r Gôf and Cae Gwyn Sites of Special Scientific Interests (SSSI) and Bae Cemlyn / Cemlyn Bay Special Area of Conservation / SSSI. NRW agree that the proposed change would not result in new or different likely significant environmental effects.

- *Marine mammals*

3.4. Paragraphs 2.4.30 – 2.4.36 and Table 2-4 considers potential impacts of the proposed change on marine mammals and states that the proposed change does not affect the assessments undertaken in D13 of the ES and the Shadow HRA. NRW agrees that the proposed change would not result in new or different likely significant environmental effect on marine mammals (as European Protected Species and/or designated features of Welsh Special Areas of Conservation).

- *Seabirds*

3.5. Paragraph 2.4.37 of the Marine Vessel Movements document states that “*the proposed change would not alter the magnitude of visual disturbance effects to seabirds, remaining as reported in chapter 13 of the Environmental Statement... and the Shadow Habitats Regulation Assessment Report*”. It is also stated that no new or different likely significant environmental effects are generated as a result of the change. NRW agree that no new or different likely significant environmental effects are generated by the proposed change.

3.6. Please note however, that NRW does not agree with the conclusions of the assessments in D13 and the Shadow HRA with respect to the Anglesey Terns SPA. We do not consider that the evidence and mitigation presented in the Shadow HRA demonstrates that noise and vibration cumulatively with the visual effects (including partly as a result of marine vessel movements) associated with the construction phase will not have adverse effects on the sandwich, arctic and common tern populations at the Cemlyn colony. NRW considers that adverse effects on the SPA (relating to sensitivity of sandwich, arctic and common terns to construction disturbance) cannot be ruled out. The proposed change has the potential to increase the risk of disturbance to the tern colony. As detailed above at paragraph 2.8, and for the purpose of this consultation specifically, NRW agrees that no new or different likely significant environmental effects are generated by the proposed change, however NRW does not agree with the conclusions of the assessment with respect to the impacts on the Anglesey Terns SPA and this should be addressed.

Please do not hesitate to contact us should you require further advice.

Yours sincerely



NWP - 28-09-2018

Rheolwr Rhaglen / Programme Manager
Swyddfa Rheolaeth Portffolio / Portfolio Management
Office Heddlu Gogledd Cymru / North Wales Police
Pencadlys Yr Heddlu / Police Headquarters
Bae Colwyn / Colwyn Bay
Conwy
LL29 8AW

Horizon Nuclear Power Wylfa Limited
Wylfa Newydd Site Office
Cemaes Bay
Anglesey
LL67 0AA

28th September 2018

Re: DCRM Ref. No: HNP-HZDCO-PAC-LET-00001

Wylfa Newydd Development Consent Order application update – your views are welcome

I write to formally submit the views of North Wales Police (NWP) in relation to the proposed changes to vessel movements and proposed changes to timings for blasting on site.

I note the information in the documentation, at this point I have no further comments to make.

Regards

Rheolwr Rhaglen / Programme Manager

Request for Non-Material Change No.1 – Blasting Strategy

Technical Report: WN0902-JAC-PAC-REP-00080

North Wales Fire and Rescue Service note the content of the Notice to Consultees and the Technical Document (viewed on line) and have no adverse comments regarding the proposal.

It is noted that there are a number of inconsistencies in the documents, which are identified below, and which should be clarified prior to being formally submitted to the Planning Inspectorate (PIN's).

Page	Paragraph	Inconsistency
1	1.1.4	Proposed time for Saturday stated in notice is different to that stated in the Technical Document: Notice: Sat 0800 – 1300 Tech Doc: Sat 0900 - 1300
7	2.4.5	Last line ... and 0800 to 1300 (4hrs) on a Saturday. Should this be 5 hrs? See Pg 6 Para 2.3.4
8	2.5.1	Contradicts Para 1.1.4 on Pg 1 however is in line with the Notice issued.
8	2.5.3	Proposed change aligns closely to BS6472-2 with start and end times 1 hour further forward to accommodate worker shift patterns - see section 4.3 Main Power Station Site sub-CoCP Application Reference 8.7 Doc 8.7 Section 4.3 Pg 9 Para 4.3.2 'drilling and packing for blasting 0700 – 1900 (moving/repositioning rock in excavation 0700 – 1900) Blasting 0800 – 1800 Monday – Friday would better align to shift time and be less likely to disturb neighbours. This would also be consistent with proposed change to starting blasting at 0800hrs on Saturdays. (see Pg6 Para 2.3.4)
12	2.7.18	Indicates that blasting will commence at 0900 on Saturdays - there is no consistency in the document / Notice. Is Saturday 0800 or 0900 start?

Request for Non-material Change No.2 – Marine Vessel Movements.

Technical Report: WN0902-JAC-PAC-REP-00081

North Wales Fire and Rescue Service note the content of the document and while supportive in principle, that the aim is to ensure that 60-80% of construction materials are delivered by sea and to allow for recovery of programme delays due to such factors as inclement weather, tides etc., the FRS wish to understand what the contingency arrangements are should there be a delay in the development of the MOLF or if it should be unavailable for an extended period.

It is noted that due to the potential increase in the number of vessel movements that the Navigational Risk Assessment (Doc D15-1, 6.4.99) will be updated to reflect this.

From: LR2 - 27-09-2018

Received: 2018-09-27T08:46:20Z

To: WylfaEnquiries@Horizonnuclearpower.com; wylfaenquiries@horizonnuclearpower.com;

Cc:

Subject: Consultation DCRM Ref. No: HNP-HZDCO-PAC-LET-00002/1254

To Kieran Somers.

My views on your proposals contained in your letter of 13th August 2018.

1) It is clear from the date of this letter-the last day for input into your Planning Application ENO10007- that these intentions to change proposals were already in train before the closing date for input to the application. As such they invalidate both that planning application and this 'consultation'. The Information supplied by you, upon which objections to the the Planning Application are based, are clearly not to be trusted as an indication of your intentions. You clearly intend to adjust any commitment given to suit yourselves at any time you choose and inconvenience the people of Anglesey in any way you choose.

2) Your contempt for the people affected by your proposals is clearly demonstrated by the time and place where people affected can make their views known; three hours in a bus in a car park on Tuesday 4th September - the day many children will be going back to School after the Summer Holidays!

3) Your proposals will affect the health and well-being of local people. The increased blasting and disruption caused by more vessel movements will also disrupt the Tourist Industry on which many people depend. Tourism also makes other businesses viable by the increase of all activities. Locals and visitors alike do not want their rest and activities disturbed by 'blasting' and 'vessel movements' to suit your Company's Financial objectives.

I shall be writing to the Planning Inspectorate regarding my concerns expressed in 1) above.

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From: Trinity House - TH - 25-09-2018

Received: 2018-09-25T09:41:42Z

To: WylfaEnquiries@Horizonnuclearpower.com; wylfaenquiries@horizonnuclearpower.com;

Cc:

Subject: Wylfa Newydd Nuclear Power Station DCO Update

Good morning Kieran,

Thank you for your letter attached.

I can confirm that Trinity House has no objections or comments to make concerning these two proposed amendments. However, I would like to draw your attention to the correct contact details that should be used for Trinity House below.

Kind regards,

Navigation Directorate
Trinity House
Trinity Square
Tower Hill
London
EC3N 4DH

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**RESPONSE BY LLANBADRIG AND MECHELL COMMUNITY COUNCILS TO HORIZON CONSULTATION
ON INCREASING VESSEL MOVEMENTS TO AND FROM THE MARINE OFFLOADING FACILITY AND
EXTENDING HOURS FOR BLASTING - 1 OCTOBER 2018.**

MOLF increased movements

We understand that Horizon wishes to import 60 – 80% of materials by sea. We welcome this strategy because it will reduce road congestion and is less damaging to the environment. To achieve this target Horizon now wishes to increase vessel movements from four movements (two vessels) per day to sixteen movements (eight vessels) per day.

We are persuaded by the supporting technical report which concludes that the additional environmental impact would be very small. Risk assessment also concludes that there is minor additional risk.

The North coast of Anglesey is a hazardous environment for shipping. Cemlyn Bay has the notorious Harry Furlong reef and Skerries close by. Over the winter poor or extreme weather is an additional hazard. The sea bed off our coast is littered with wrecks of ships that in earlier times were unable to cope with these conditions.

With modern navigation technology and competent harbour management the change envisaged should not cause concern. Therefore, we support this change. We would appreciate being advised about what regime of Harbour management is proposed and what enforcement powers may be acquired.

Blasting

Horizon argues that its blasting requirements are complex and different from conventional quarrying. For safety reasons there will be times when it will be necessary to evacuate large numbers of workers with consequential disruption to construction activities. As we understand the proposal it is not intended to increase the number of blast actions (three per day) but to extend the period in a day. We note that the proposed change extends the blasting period during the week by 3 hours per day and by two hours on Saturday. We accept that the reasoning for this is sound and that the benefit will be to deliver construction on time. The shorter the total period devoted to blasting the better. Therefore, we support this change on the basis that during the week blasting will not occur after 19.00 irrespective of the timing of dusk. We would oppose any attempt to carry out blasting later than 7 p.m. because of the potential effect upon the bedtime of children.

We believe that the proposed change reinforces the urgency for Horizon to explain and implement mitigation measures for people and properties that will be adversely affected.

6 Appendix 3: Horizon's responses to consultation responses received

Consultee	Ref	Response	Horizon's response
NWWT	NWWT-28-09-2018	<p>[Comments in relation to the DCO application]</p> <p>I am writing via this email to register North Wales Wildlife Trust's concern and lack of agreement to the proposition that these changes are non-material and do not alter the nature and conclusions of the Environmental Statement and the shadow Habitats Regulations Assessment. NWWT recently submitted our detailed comments to NRW on the Permits and Marine Licences and so have scrutinised both the ES, the project activities and the shadow HRA along with the relevant Codes of Construction/Operation Practice and have found many areas which cause concern. Those concerns have particular relevance to the topics under consideration in this consultation.</p> <p>[....]</p> <p>There is a high degree of uncertainty about what materials can be derived on site and if they can't whether they will be delivered via sea or road. The projects description for the Marine Licence demonstrates uncertainty in a number of areas:</p> <ul style="list-style-type: none"> • temporary access ramp materials either from off or on site. Delivery by road or sea. • temporary barge berth constructed from either site won or imported materials. It is not 	<p>The response from NWWT seems to be primarily addressing issues in the DCO application in respect of the adequacy of the Environmental Statement, the Shadow HRA and control documents. While Horizon acknowledges these concerns, they relate to the examination of the DCO application itself and its documents and assessments, rather than the assessment of the proposed change. For this reason, Horizon considers that these concerns will be considered as part of the examination process, rather than through this change request.</p> <p>Horizon has assessed the RfNMC against the Environmental Statement and has concluded there will be no new or significantly different environmental effects as a result of the RfNMC than those assessed in the Environmental Statement.</p>

Consultee	Ref	Response	Horizon's response
		<p>stated whether imported materials would be delivered by road or sea</p> <ul style="list-style-type: none"> the CWS coffer dam incorporating temporary causeway. Sheet wall piles and tubular piles to be delivered by road or sea. drainage pipes to be delivered by road or sea. Cooling water intake coffer dam “the steel piles, bracing materials and fill material will be delivered to site by sea and/or by road” (my emphasis). Temporary waste water outfall “rock foundations, pipeline and concrete mat and other materials” will be delivered by sea or road. The temporary waste water outfall will be dismantled and either used on site or removed off-site to a licensed tip. It is not clear if the off-site location might be the Holyhead Disposal site which would require further vessel movements The core of the western breakwater will be materials derived from the Power Station Site. However, the pre-cast armour units and the rock underlay will be transported to site by sea or from land. <p>The basis for the impact assessment has been made on 60 – 80% of deliveries being made from sea, but with the level of uncertainty indicated above it is unclear whether a total figure has been calculated of</p>	

Consultee	Ref	Response	Horizon's response
		<p>the hypothetical maximum number of deliveries and what therefore may entail the worst case of 80%.</p> <p>[...]</p> <p>The Transport & Logistics Study report [RD17] and its accompanying caveats [RD18] do not appear to be referred to in any of the submitted DCO documents or the Environmental Statement. Therefore this level of uncertainty does not appear to have been replicated in modelling for example in relation to air emissions. In fact, Appendix D5.02 (Main Site Construction Phase Air Dispersion EIA – Final Modelling Report) simply states that “Horizon provided the number of marine vessels/types and MOLF construction plant on a monthly basis for each of the 2020 (when the MOLF is undergoing construction) and 2023 (when the MOLF is operational) construction years”, with no qualification to represent any estimated upper or lower limits or referencing of the Transport & Logistics caveats. Given Horizon's own self-acknowledged estimates of vessel movements it is highly likely that the proposed non-material amendment change could result in considerably more vessel movements than was initially considered or modelled within the ES chapters.</p> <p>[...]</p> <p>ES Appendix B5-2 bases statements on the conclusions of a report [RD6 CEH report] that is not</p>	

Consultee	Ref	Response	Horizon's response
		<p>referenced in the B5-2 documents list and was not available for review. This is important as there appears to be little understanding of why the critical load for Cemlyn Bae SAC was changed from 8 KgN/ha/year to 20 and whether this includes only the terrestrial vegetated habitats rather than those of the saline lagoon itself. Therefore no conclusions on the Report's veracity can be provided by the consultees and cannot be commented on in relation to the proposed non-material amendment. Additionally, this appendix which defines the critical loads for ecological receptors does not include Tre'r Gof in Table 4-1</p> <p>[...]</p> <ul style="list-style-type: none"> • The Marine Works sub-CoCP indicates (7.3.2) that additional air quality modelling may be needed to develop an air quality control protocol and the assumptions based in the modelling report (D5-2) will also be altered now by the non-material amendment. This will change, as a starting point, the predicted total one hour mean nitrogen dioxide values, but may also result in changes to the total annual mean levels depending on the distribution of deliveries across the year and/or the number of vessels increase in totality. The supporting document of the non-material amendment provides only a simple statement to indicate that the models have been re-run and that no significant change resulted. This is not sufficient in our view. 	

Consultee	Ref	Response	Horizon's response
		<p>[...]</p> <p>NWWT do not feel that there had been sufficient consideration, within the original ES, of factors to reduce and mitigate for these impacts and proposed controls on delivery routes, timings or break out routes from the Holyhead Separation Lanes were poorly developed to deal with ES' original conclusions. It is our opinion that there is a greater imperative to consider this matter in relation to the proposed changes to vessel movements.</p> <p>[...]</p> <p>Given these results it would also alter the illustrations in the ES figures D5-7 – D5-10 and there will be a considerably greater magnitude of change over the current baseline levels. It is of note that a baseline levels 'temperature' plan is not provided in a visual representation, although the ES acknowledges that the baseline is relatively broad brush.</p> <p>[...]</p> <p>Little information appears to be available within the DCO or the Marine Licence application on the matter of shipping movements in and out of the harbour (MOLF) or their approach to it. Nor does ES chapter D15 (Shipping & Navigation) provide any additional information on shipping routes for deliveries or disposal of dredging materials. This is a critical consideration now a four-fold increase in vessel movements is being considered. This in our view is</p>	

Consultee	Ref	Response	Horizon's response
		not only in relation to ecological receptors but also in terms of the Navigational Risk Assessment (Marine Licence) for the project, however, this element is entirely outside our remit	
NWWT	NWWT-28-09-2018	<p>The non-material amendment which has now been submitted confounds the situation, as the maximum number of boat movements/day is to be raised from 4 (equivalent 2 vessels) to 16 (equivalent 8 vessels). Horizon indicates that this will not alter the total number of vessels, but a total figure appears not to have been accurately calculated (cf discussion at 3.2.2 of Biosecurity Risk Assessment Strategy Report and supporting documents [RD17] & [RD18]1):</p> <p>-</p> <p>“Hitachi-GE Nuclear Energy Ltd. has produced a report (Transportation and Logistics Study CPJ-UW-A408) detailing transportation plans for equipment and materials required for construction [RD17]. The report aims to identify the transport modes and estimated number of vessels required. The details given in [RD17] are not final; further considerations are required. [RD17] should therefore be taken as the best estimate of logistical implications at the time of the report and is subject to change [RD18].” My emphasis From paragraph 3.2.2 of Biosecurity Risk Assessment Strategy Report doc ref ML-OTH-03-BSRA for the Marine Licence</p>	<p>This RfNMC relates only to increasing the upper daily limit of vessels using the MOLF so that unforeseen events, such as bad weather, can be accommodated. Horizon confirms that the proposed change will not increase the total number of vessel movements allowed under the DCO</p>

Consultee	Ref	Response	Horizon's response
NWWT	NWWT-28-09-2018	<p>[Comments in relation to the scope of the proposed change]</p> <ul style="list-style-type: none"> The Marine Works sub-CoCP indicates (7.3.2) that additional air quality modelling may be needed to develop an air quality control protocol and the assumptions based in the modelling report (D5-2) will also be altered now by the non-material amendment. This will change, as a starting point, the predicted total one hour mean nitrogen dioxide values, but may also result in changes to the total annual mean levels depending on the distribution of deliveries across the year and/or the number of vessels increase in totality. The supporting document of the non-material amendment provides only a simple statement to indicate that the models have been re-run and that no significant change resulted. This is not sufficient in our view. <p>[...]</p> <ul style="list-style-type: none"> It is unclear if Trwyn Pen Carreg and Arfordir Mynydd y Wylfa – Trwyn Penrhyn Local Wildlife Sites' critical loads have considered the lichen/bryophytes and the nationally significant CHEG fungi as critical receptors to changes in air quality. APIS (Air Pollution Information Service) habitat statistics do not include a habitat defined by coastal grassland heath matrix but the description for dwarf heath communities the mosses, lichen and bryophyte element of habitat is recognised as being most susceptible to nitrogen deposition. Given the 	<p>As above. In addition, this RfNMC relates only to the upper daily limit of vessels using the MOLF; it is not suggesting that vessel movements will be 'quadrupled'.</p> <p>The RfNMC does not seek to change the overall figures for marine vessel movements or a change in the mix. The construction will proceed according to a schedule with certain items constructed early, others later, and this will determine what arrives at the MOLF.</p> <p>Horizon's objective is to maximise use of the MOLF at key periods and allow recovery of the programme following delays.</p>

Consultee	Ref	Response	Horizon's response
		<p>importance of the lower plant element in the coastal communities a lower critical threshold may need to be considered. For example, in lichen and moss dominated habitats the loads can be as low as 5 or 8KgN/ha/year (APIS search term 'lichen & moss' advanced search critical load).</p> <p>[...]</p> <ul style="list-style-type: none"> • The Tables in ES Chapter D5 would also need to be adjusted for short-term changes in NOx, nitrogen deposition and acid deposition for Year 2 harbour (MOLF) construction (and potentially Y5) depending on how the mix of changes in vessel rates is distributed over the construction period. <p>[...]</p> <ul style="list-style-type: none"> • NWWT raised concerns in their Marine Licence response regarding the effectiveness of the proposed monitoring and mitigation in relation to the CoCP and have suggested that further consideration needs to be given to a number of areas relating to shipping movements, such as alternative power sources when vessels are docked rather than operating at 80% engine capacity. This is even more pertinent given the proposed quadrupling of vessel movements. <p>[...]</p> <ul style="list-style-type: none"> • Changes resulting from the non-material amendment will result in one vessel on average 	

Consultee	Ref	Response	Horizon's response
		<p>passing in or out of the harbour (MOLF) every 1.5 hours, or alternatively ships being grouped to all passage on an adventitious tide. This is opposed to the ES consideration of one vessel on average every 6 hours. This difference is considered to add significantly to the levels of disturbance to the terns both alone and in combination with other impacts associated with the DCO. This is within the context that the shadow HRA has not demonstrating beyond reasonable scientific doubt that there will be no Adverse Effect on Site Integrity. This is an opinion that is not only held by NWWT but also by the SNCO in their responses to the DCO and therefore this matter should be investigated more thoroughly in relation to this four-fold increase in the number of vessels entering and leaving the harbour within any 24-hour period and the associated risks to the breeding tern colony.</p> <p>[...]</p> <p>Little information appears to be available within the DCO or the Marine Licence application on the matter of shipping movements in and out of the harbour (MOLF) or their approach to it. Nor does ES chapter D15 (Shipping & Navigation) provide any additional information on shipping routes for deliveries or disposal of dredging materials. This is a critical consideration now a four-fold increase in vessel movements is being considered. This in our view is not only in relation to ecological receptors but also in</p>	

Consultee	Ref	Response	Horizon's response
		terms of the Navigational Risk Assessment (Marine Licence) for the project, however, this element is entirely outside our remit	
NWWT	NWWT-28-09-2018	<ul style="list-style-type: none"> There appears to be little consideration of the consequences of a four-fold increase in large sea-going ships (up to 100m long) crossing the Sandwich tern foraging route as the birds are less than 1km to 1.5km from the breeding colony. The work within the ES and its appendices show that the majority of Sandwich terns leave the breeding colony to fly east across Porth-y-Pistyll, the location of the new harbour (MOLF) and breakwaters and all vessels entering the harbour will bisect the tern's foraging trajectory. 	This is a comment on the basis of the DCO not on the RfNMC. Further, there is no proposal for a "four-fold increase in vessel movements" - only a change to the upper daily limit for vessel movements.
Local Resident 1	LR1-26-09-2018	Q1. Am I correct in assuming that the intention is for the MOLF harbour to potentially have vessel movements 24hs/day, 7days/week, 52weeks a year?	It is anticipated that, at the peak of operations of the MOLF, there is the potential for 8 vessels per day to use the MOLF in a given 24 hour period. This is not envisaged to comprise continuous transit to / from the MOLF over the 24 hour period, as there are multiple berths available at the MOLF. This represents an anticipated peak usage of the MOLF, and is not considered representative of the typical usage.
Local Resident 1	LR1-26-09-2018	Q2. Are there any tidal restrictions for entry to, egress from or berthing within the MOLF harbour.	There are no tidal restrictions on access / egress / berthing at the MOLF.
Local Resident 1	LR1-26-09-2018	Q3. Will the Local Port Service (LPS) respond to VHF calls from mariners intending to make passage in the vicinity of the MOLF harbour to advise on	The intention is that the LPS would respond to requests for information on vessel movements. The LPS would obtain a licence from OFCOM for a

Consultee	Ref	Response	Horizon's response
		vessel (ship and tug) movements? What VHF channel do the LPS propose using? I welcome Horizon's answer to question 3 that they will respond to requests for information regarding vessel movements. If this is Horizon's intention it is not clear in the relevant DCO / RfNMC documentation and from a safety point of view Horizon should at least consider a more proactive system.	dedicated VHF channel. Details of this would be available in the Admiralty List of Radio Signals (ALRS).
Local Resident 1	LR1-26-09-2018	Q4. There is a reference in document 6.4.15 to mooring buoys. What are the approximate Latitude and Longitude positions of these mooring buoys?	HNP cannot find "mooring buoys" in document 6.4.15/App-134. There are references to mooring dolphins, which would be structures within the proposed harbour.
Local Resident 1	LR1-26-09-2018	You may remember that there was a query about my reference to 'mooring buoys' in Q4. There is a reference to temporary moorings at 15.5.20 in document 6.4.15/APP-134. As I understand it these would be deployed during the construction phase of the MOLF.	The temporary moorings are intended to take the form of a temporary barge berth at the site of the MOLF. This would form one of the first parts of the marine construction works and would be removed as the MOLF is completed. 15.5.20 in document 6.4.15/APP-134 is concerned with the failure of the mooring system (bollards, mooring lines, etc.) at this temporary berth as it would be exposed prior to the completion of the breakwaters.
Local Resident 1	LR1-26-09-2018	Q5. How many tugs will be needed to assist each vessel when entering or leaving the harbour? Will all vessels require tug support? At approximately what Latitude and Longitude position will the tugs rendezvous with incoming vessels? At approximately what Latitude and Longitude position will the tugs release the vessels for onward passage?	Up to 2 tugs may be required, depending on conditions and vessel type. Not all vessels would require tug support, depending on weather conditions. Tugs may be used on approach to the harbour, within the harbour, or (in the case of barges) throughout the barge transit. As such, it isn't possible to provide a location.

Consultee	Ref	Response	Horizon's response
Local Resident 1	LR1-26-09-2018	<p>The response to question 5 suggests that due to some ships requiring up to 2 tugs Horizon's figures for the total number of vessel movements in and out of the MOLF may be underestimated.</p>	<p>The 16 movements per day of the RfNMC relates to the vessels delivering material to site, and not the associated port service craft (for example, tug and pilot boat movements). The Navigation Study (BMT Argoss, December 2016) recommended a minimum of 1 sea-going tug per movement (both in- and out-bound). An additional (smaller) harbour tug was recommended as a redundancy within the harbour itself, but would not necessarily leave the harbour during vessel movements. Pilot transfer will be carried out with an appropriate vessel designed for this purpose.</p> <p>Each vessel movement (either arrival or departure) would have its associated port service craft movements. However, in some circumstances, and subject to navigational risk review, some vessels may not require tug support and some vessels may not require a pilot (if for example, a Pilot Exemption Certificate (PEC) holder were on board). Hence, each delivery vessel movement could need up to four port service craft movements (two movements for the tug and two for the pilot boat) or no port service craft.</p> <p>In terms of shipping and navigation assessments the inclusion of port service craft is not normally considered as the movements are short and confined to within the area around the Marine Offloading Facility rather than to a primary or</p>

Consultee	Ref	Response	Horizon's response
			secondary port. The size of vessels is also considerable smaller than cargo vessels resulting in smaller environmental footprint.
Local Resident 1	LR1-26-09-2018	Q6. There is a reference in document 6.4.15/APP-134 to a safety zone. What will be the Latitude and Longitude of the corners of the safety zone?	The safety zones will be determined by the Harbour Authority once established.
Local Resident 1	LR1-26-09-2018	Q7. Will some of the bulk material vessels and/or non divisible load barges be on passage from Holyhead and if so which passages at Carmel Head are they intending to use? I also welcome the clarification in response to question 7 on the proposed routes between the MOLF and the Holyhead North spoil ground that avoids the inshore passage.	The assumed passage for dredging movements between the harbour and disposal area is north from the harbour, to pick up Skerries Lighthouse transit on bearing 258 to South and North Stacks transit on bearing 211 then west to Holyhead North spoil ground.
Local Resident 1	LR1-26-09-2018	Q8. Should this increase in daily ship movements be approved by the planning inspectorate will the increased flexibility that will be available enable the applicant to consider suspending ship movements during summer weekends or during one off events such as the Round Anglesey Yacht Race?	No. Ship movements will not be suspended during summer weekends or during one-off events such as the Round Anglesey Yacht Race. However, commercial shipping routes (such as the barges destined for Wylfa) are typically located further off shore so should create little to no impact on weekend visitors. Additionally, entrances to the MOLF harbour will be managed to avoid any

Consultee	Ref	Response	Horizon's response
			impacts between private ship movements and commercial movements.
Local Resident 1	LR1-26-09-2018	<p>Document 6.4.15/App-134</p> <p>"15.3.8 There are a number of cardinal marker buoys to the east of Wylfa Head marking where rocks are close to the surface, and also to the west marking The Skerries."</p> <p>The sentence would be correct if Carmel Head was substituted for Wylfa Head.</p>	Correct, this is an error in our document. It should be Carmel Head. We will correct under 'errata' during Examination.
Local Resident 1	LR1-26-09-2018	<p>Document Wylfa Newydd Project Request for Non-Material Change no.2 Marine Vessel Movements</p> <p>2.3.9 The effects of the proposed change to the assessments listed in paragraphs 2.3.2 and Error! Reference source not found. above are summarised in REF_Ref516641418 \r \h Table 2-4, with further discussion provided below where relevant.</p> <p>I am not completely sure which paragraphs are referenced in 2.3.9 above.</p>	This is a formatting error in the document, which will be corrected. It should read: 2.3.9 The effects of the proposed change to the assessments listed in paragraph 2.3.2 above are summarised Table 2-4, with further discussion provided below where relevant.

Consultee	Ref	Response	Horizon's response
Local Resident 1	LR1-26-09-2018	<p>I would also suggest that the following organisations should be consulted on these proposed changes.</p> <ul style="list-style-type: none"> • RYA Cymru Wales • Holyhead Sailing Club • North West Venturers Yacht Club • Royal Anglesey Yacht Club • Royal Welsh Yacht Club • Caernarfon Sailing Club • Conwy Yacht Club • Conwy Marina Berth Holders Association • North Wales Cruising Club 	A letter was sent to all listed stakeholders in line with the suggestion. This letter is appended as Appendix 4 . No representations were received.
Local Resident 1	LR1-26-09-2018	I remain to be convinced that Horizon have fully appreciated the frequency that recreational boats, both sail and power, use the route close inshore along the north coast of Anglesey. The use is predominately seasonal, often but not exclusively at weekends, usually but not always during daylight hours and the times of high or low water at Carmel Head influence passage plans. In addition the tidal stream can run at up to 5 knots at springs.	Noted; however, this relates to the DCO application, rather than this proposed change. In addition, this proposed change does not alter the maximum total number of vessel movements for the construction period; just the upper daily limit.
Local Resident 1	LR1-26-09-2018	It is disappointing to see little or no direct engagement with the RYA, RYA Cymru Wales or the local sailing clubs before the submission of the DCO / RfNMC. Potentially important issues such as the location of 'mooring buoys' during MOLF construction (15.5.20 in document 6.4.15/APP-134), the extent and purpose of the proposed 'safety zone' and the likely split of daytime / night time ship	Noted; however, this relates to the DCO application, rather than this proposed change.

Consultee	Ref	Response	Horizon's response
		movements could have been discussed and potentially resolved.	
NRW	NRW-28-09-2018	<p>Air Quality Paragraphs 2.4.14 – 2.4.24 and Table 2-4 describe the possible effects of increased emissions of the peak marine vessel movements on Tre'r Gôf and Cae Gwyn Sites of Special Scientific Interests (SSSI) and Bae Cemlyn / Cemlyn Bay Special Area of Conservation / SSSI. NRW agree that the proposed change would not result in new or different likely significant environmental effects.</p> <p>Marine mammals Paragraphs 2.4.30 – 2.4.36 and Table 2-4 considers potential impacts of the proposed change on marine mammals and states that the proposed change does not affect the assessments undertaken in D13 of the ES and the Shadow HRA. NRW agrees that the proposed change would not result in new or different likely significant environmental effect on marine mammals (as European Protected Species and/or designated features of Welsh Special Areas of Conservation).</p> <p>Seabirds Paragraph 2.4.37 of the Marine Vessel Movements document states that “the proposed change would</p>	Noted that NRW agree with Horizon's conclusions that the proposed change would not result in new or different likely significant environmental effects.

Consultee	Ref	Response	Horizon's response
		<p>not alter the magnitude of visual disturbance effects to seabirds, remaining as reported in chapter 13 of the Environmental Statement... and the Shadow Habitats Regulation Assessment Report". It is also stated that no new or different likely significant environmental effects are generated as a result of the change. NRW agree that no new or different likely significant environmental effects are generated by the proposed change.</p>	
NRW	NRW-28-09-2018	<p>Please note however, that NRW does not agree with the conclusions of the assessments in D13 and the Shadow HRA with respect to the Anglesey Terns SPA. We do not consider that the evidence and mitigation presented in the Shadow HRA demonstrates that noise and vibration cumulatively with the visual effects (including partly as a result of marine vessel movements) associated with the construction phase will not have adverse effects on the sandwich, arctic and common tern populations at the Cemlyn colony. NRW considers that adverse effects on the SPA (relating to sensitivity of sandwich, arctic and common terns to construction disturbance) cannot be ruled out. The proposed change has the potential to increase the risk of disturbance to the tern colony. As detailed above at paragraph 2.8, and for the purpose of this consultation specifically, NRW agrees that no new or different likely significant environmental effects are generated by the proposed change, however NRW does not agree with the conclusions of the</p>	<p>NRW's position with respect to the Shadow HRA is noted and understood.</p> <p>While Horizon acknowledges these concerns, they relate to the examination of the DCO application itself and its documents and assessments, rather than the assessment of the proposed change. For this reason, Horizon considers that these concerns will be considered as part of the examination process, rather than through this change request. (Horizon has, however, addressed the SPA and the marine environment as part of its assessment of the proposed change in section 2.3 and 2.4 of this document.)</p>

Consultee	Ref	Response	Horizon's response
		assessment with respect to the impacts on the Anglesey Terns SPA and this should be addressed.	
North Wales Police	NWP-28-09-2018	I note the information in the documentation, at this point I have no further comments to make.	
North Wales Fire and Rescue Service	NWFR-28-09-2018	North Wales Fire and Rescue Service note the content of the document and while supportive in principle, that the aim is to ensure that 60-80% of construction materials are delivered by sea and to allow for recovery of programme delays due to such factors as inclement weather, tides etc., the FRS wish to understand what the contingency arrangements are should there be a delay in the development of the MOLF or if it should be unavailable for an extended period. It is noted that due to the potential increase in the number of vessel movements that the Navigational Risk Assessment (Doc D15-1, 6.4.99/APP-235) will be updated to reflect this.	Noted. The RfNMC acknowledges the need to update the NRA which will be submitted in the course of examination.
Local Resident 2	LR2-27-09-2018	It is clear from the date of this letter-the last day for input into your Planning Application ENO10007- that these intentions to change proposals were already in train before the closing date for input to the application. As such they invalidate both that planning application and this 'consultation'. The Information supplied by you, upon which objections to the the Planning Application are based, are clearly not to be trusted as an indication of your intentions. You clearly intend to adjust any commitment given to suit yourselves at any time you choose and	In respect of the timing of the proposed change, section 2.2 of this report notes that that the proposed change has arisen following selection of the project management contractor (who raised concerns on the practicability of the DCO vessel movements) and Horizon seeking additional flexibility within the delivery programme in the event of bad weather or the MOLF being unavailable for temporary periods.

Consultee	Ref	Response	Horizon's response
		inconvenience the people of Anglesey in any way you choose.	For this reason, this change could not be included within the DCO application, and therefore is being sought as part of the examination process.
Local Resident 2	LR2-27-09-2018	Your contempt for the people affected by your proposals is clearly demonstrated by the time and place where people affected can make their views known; three hours in a bus in a car park on Tuesday 4th September - the day many children will be going back to School after the Summer Holidays!	The consultation events that were held by Horizon were only one of the ways in which the public could consider and provide their views on the proposed change. In addition to the consultation materials being publicly available on the consultation website, Horizon also undertook maildrops within affected areas, provided a free postal address and enquiry line, and offered further meetings with affected parties if required. For these reasons, Horizon considers that the consultation process was adequate to enable all parties to provide their views on the proposed change.
Local Resident 2	LR2-27-09-2018	Your proposals will affect the health and well-being of local people. The increased blasting and disruption caused by more vessel movements will also disrupt the Tourist Industry on which many people depend. Tourism also makes other businesses viable by the increase of all activities. Locals and visitors alike do not want their rest and activities disturbed by 'blasting' and 'vessel movements' to suit your Company's Financial objectives.	As set out in Table 2-4 and section 1.3 above, in preparing the proposed change Horizon undertook a detailed review of the assessments in the DCO application and concluded that the proposed change will not have any new or different significant effects than those already assessed under the DCO application, including effects on local community and tourism. With regard to construction activities at the Wylfa Newydd Development Area, the population health and well-being effects from air quality, noise and lighting are assessed in sections D.2 and D.3 of the Comprehensive Health Impact

Consultee	Ref	Response	Horizon's response
			<p>Assessment Report submitted as part of our DCO application.</p> <p>The socio-economic assessment within our DCO application concludes that there would be a project wide, significant adverse effect on tourism during the construction phase of the Project. In recognition of this Horizon proposes additional mitigation including a Tourism Fund.</p> <p>The appropriateness of the effects that have been identified in the DCO application will be considered by the Examining Authority as part of its examination; however, the proposed changes do not alter the original conclusions. The appropriateness of the effects that have been identified in the DCO application will be considered by the Examining Authority as part of its examination; however, the proposed changes do not alter the original conclusions.</p>
Trinity House	TH-25-09-2018	I can confirm that Trinity House has no objections or comments to make concerning these two proposed amendments.	Noted.

Consultee	Ref	Response	Horizon's response
Llanbadrig and Mechell Community Councils	LMCC-01-10-2018	<p>We understand that Horizon wishes to import 60 – 80% of materials by sea. We welcome this strategy because it will reduce road congestion and is less damaging to the environment. To achieve this target Horizon now wishes to increase vessel movements from four movements (two vessels) per day to sixteen movements (eight vessels) per day. We are persuaded by the supporting technical report which concludes that the additional environmental impact would be very small. Risk assessment also concludes that there is minor additional risk.</p> <p>The North coast of Anglesey is a hazardous environment for shipping. Cemlyn Bay has the notorious Harry Furlong reef and Skerries close by. Over the winter poor or extreme weather is an additional hazard. The sea bed off our coast is littered with wrecks of ships that in earlier times were unable to cope with these conditions.</p> <p>With modern navigation technology and competent harbour management the change envisaged should not cause concern. Therefore, we support this change. We would appreciate being advised about what regime of Harbour management is proposed and what enforcement powers may be acquired.</p>	<p>The Llanbadrig and Mechell Community Councils support of the proposed change is noted. In respect of additional information regarding harbour management and enforcement powers, Horizon considers that these matters relate to the examination of the DCO application itself, rather than the assessment of the proposed change.</p> <p>For this reason, Horizon considers that these concerns will be considered as part of the examination process, rather than through this change request. This information is already included in the DCO application and Horizon is willing to provide any further information during examination if required.</p>

7 Appendix 4: Copies of letters sent to additional consultees

The following letter was sent to:

RYA Cymru Wales
Holyhead Sailing Club
North West Venturers Yacht Club
Royal Anglesey Yacht Club
Royal Welsh Yacht Club
Caernarfon Sailing Club
Conwy Yacht Club
Conwy Marina Berth Holders Association
North Wales Cruising Club

29 Awst 2018

Cyfeirnod DCRM: HNP-HZDCO-PAC-LET-00001

Annwyl,

Y diweddaraf am gais Gorchymyn Cydsyniad Datblygu Wylfa Newydd - croesawir eich safbwytiau

Ym mis Mehefin 2018, cyflwynasom ein cais i'r Arolygiaeth Gynllunio i adeiladu a gweithredu Wylfa Newydd, gorsaf bŵer niwclear newydd ar Ynys Môn. Ers hynny, rydym wedi gwneud rhai mân newidiadau i rai agweddau o'r cynigion hyn a hoffem gael eich barn am y rhain.

Rydym yn cynnig newid y nifer dyddiol uchaf o symudiadau llong i'r Cyfleuster Dadlwytho Morol; ac oddi yno. Drwy wneud hyn rydym yn defnyddio'r cyfleuster i'r eithaf ac yn rhoi cyfle i adfer y rhaglen os bydd oedi'n digwydd oherwydd y llanw, y tywydd ac yn y blaen. Bydd y llongau yn dod â chyflenwadau, deunyddiau a chyfarpar mawr i'r safle.

Rydym hefyd yn cynnig newid yr amserlen ffrwydro bresennol, gwaith angenrheidiol i helpu i lefelu'r safle ar gyfer adeiladu, cloddio a symud nodweddion o dan y tir sydd bellach yn ddiangen. Bydd hyn yn lleihau unrhyw oedi posibl i raglen ehangach y Prosiect.

Rwyf wedi cynnwys rhagor o wybodaeth am y newidiadau hyn. Byddem yn croesawu eich sylwadau ar y rhain rhwng 14 Awst a 28 Medi 2018.

Fel rhan o hyn, byddwn allan yn ein bws ymgynghori ddydd Mawrth 4 Medi 2018. Gallwch gael rhagor y wybodaeth yno a siarad ag aelodau o dîm y prosiect:

- Maes parcio Cae Pwmp, Cemaes, 10am - 1pm
- Maes parcio'r Douglas Inn, Tregele, 2pm - 5pm

Oni allwch fynychu'r sesiynau hyn mae rhagor o fanylion ar gael, gan gynnwys yr Adroddiadau Technegol, ar ein gwefan yn www.horizonnuclearpower.com/ymgynghoriad

Gallwch roi eich barn i ni hefyd drwy ysgrifennu atom yn Freepost WYLFA NEWYDD (dim angen stamp) neu drwy anfon e-bost at ymholiadauwylfa@horizonuclearpower.com erbyn 28 Medi 2018. Os oes gennych chi unrhyw gwestiynau, mae croeso i chi ein ffonio ni ar 0800 954 9516.

Diolch i chi ymlaen llaw am gyfrannu. Mae eich barn yn bwysig i ni ac rydym yn gobeithio eich gweld yn un o'n digwyddiadau.

Yn gywir,

Kieran Somers
Pennaeth Cynllunio, Pŵer Niwclear Horizon

29 August 2018

DCRM Ref. No: HNP-HZDCO-PAC-LET-00001

Dear,

Wylfa Newydd Development Consent Order application update – your views are welcome

In June 2018, we submitted to the Planning Inspectorate our application to build and operate Wylfa Newydd, a new nuclear power station on Anglesey. We've since made some minor refinements to aspects of these proposals and we'd like to hear what you think.

We are proposing to amend the maximum daily number of vessel movements to and from the Marine Off-Loading Facility, thus maximising its capability and allowing for programme recovery should delays occur due to tides, weather etc. The vessels will bring bulk equipment, materials and supplies to site by sea.

We're also proposing to amend the existing blasting schedule that will be needed to help level the site for construction, excavation and to remove redundant buried features. This will minimise any potential delays to the wider Project programme.

I've enclosed more information on these amends. We would welcome your views on these between 14 August and 28 September 2018.

As part of this, we will be out in our consultation bus on Tuesday 4 September 2018, where you can find out more and speak with members of the project team:

- Cae Pwmp car park, Cemaes, 10am - 1pm
- Douglas Inn car park, Tregele, 2pm - 5pm

If you're unable to attend these sessions you can find more details, including the Technical Reports, on our website at www.horizonnuclearpower.com/consultation

You can give us your views by writing to us at Freepost WYLFA NEWYDD (no stamp needed) or by emailing wylfaenquiries@horizonnuclearpower.com by 28 September 2018. If you have any questions, please feel free to call us on 0800 954 9516.

Thank you in advance for taking part. Your views are important to us and we hope to see you at one of our events.

Yours sincerely,

Kieran Somers
Head of Planning, Horizon Nuclear Power