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**To:** [Stephens, Jake](#); [Wylfa Newydd](#)  
**Subject:** Written Representations  
**Date:** 04 December 2018 11:42:56  
**Attachments:** [Written Representation deadline 2 Introduction.docx](#)  
[Shipping and navigation Written Representation.docx](#)  
[A5025 changes FINAL.docx](#)

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Bore da Kay a Jake,

Please find attached three documents:

1. Written Representation and summary of Shipping and Navigation and Traffic and Transport (NMU)
2. Written Representation Shipping and Navigation
3. Written Representation Traffic and Transport (NMU)

Cofion,  
Dafydd

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## Wylfa Newydd DCO Examination

### Written Representation at Deadline 2 – Dafydd Griffiths

#### Shipping and navigation

##### Introduction

I was born in north Wales and have lived and worked in Wales, England and abroad. For the past 30 years my home has been on Anglesey. I have been a member of Llanelian Community Council continuously for close to 30 years. I currently represent the community council on the Wylfa Newydd Project Liaison Group (WNPLG) and the North Anglesey Councils' Partnership (NACP). I am a member of a local sailing club and a berth holder at Dinorwic Marina on the Menai Strait. I have been a director of RYA Cymru Wales and a former chair of the organisation for a 5yr term.

I am a fluent Welsh speaker but I have chosen to submit this written representation in English as I will frequently be referencing documents submitted by the applicant in that language.

This written representation represents my personal views on specific elements of Shipping and navigation proposals within the DCO documentation.

##### Support of sea transport of AILs and bulk materials by sea to MOLF

I welcome the proposal to use sea transportation and the Marine Off Loading Facility (MOLF) to substantially reduce the number of HGV and AIL movements that would be needed on the A5025.

I note the following in APP-133 6.4.15 Volume D – Shipping and navigation

*"15.4.5 Use of the MOLF would greatly reduce the number of deliveries by road and therefore the volume of traffic and its associated effects. Current estimates are approximately 60% to 80% of all construction materials (by weight), including the majority of Abnormal Indivisible Loads, would be delivered via the MOLF. This chapter considers the worst case for its assessment."*

The maximisation of deliveries of AILs and construction materials via the MOLF is welcomed locally. However, just for clarification, could the applicant confirm that 60% is an absolute minimum and that the term 'worst case' is represented by the 80%. Secondly, that this larger 80% figure has been used to calculate the number of vessel movements (ie ships and tug / barge combinations). I will return to the use of the term 'vessel movements' shortly.

##### Shipping and navigation DCO / Non-material change request comments

The recent submission of a Non-Material Change Request to increase the maximum number of daily vessel movements also drew my attention to some of the details in the original DCO documentation APP-080 6.2.15, APP-134 6.4.15 and APP-235 6.4.99. As the original documentation suggested an average of only 2 vessels a day I had not looked at this aspect of the project in any great detail initially.

Therefore, on the 26/08/2018 I wrote to Wylfa Enquiries to seek further information about vessel movements in general. This consisted of 8 questions, suggestions for expanding the organisations that should be consulted on the Non-Material Change and a factual correction. I was invited to a meeting on the consultation bus at the Douglas Inn on 04/09/2018 and received a paper copy of the applicant's responses to each question. My suggested correction was noted and it was agreed that it

will be corrected via the examination erratum documentation. It was agreed that I would be sent an electronic version with further clarification on some aspects. Despite sending two reminders I did not receive an electronic copy prior to submitting my consultation comments on 26/09/2018. On the closing date for comments (28/09/2018) I did receive some additional information from the applicant and on the 16/11/2018 I received a response to my feedback confirming that my comments had been noted and reviewed by the applicant's team.

All this correspondence is helpfully recorded in the report - Request for Non-Material Change no 2 Marine Vessel Movements. I am currently unable to locate an enquiry code for this document in the Examination Library.

The following background may help put into context my initial and follow up questions about the applicant's Shipping and navigation proposals.

The north coast of Anglesey can be a challenging area of sea to navigate. The tides set strongly on both the ebb and the flood. Even in moderate winds overfalls develop due to the uneven seabed. To the west of the MOLF harbour in the direction of Carmel Head the area is set about with offshore rocks but these are all well marked. The prevailing winds are from the South West and in light to moderate conditions most yachts travelling between Holyhead and Point Lynas will use the inshore passage. This is the shortest distance, in the prevailing offshore winds the water will be quite flat and the wind strength will be moderated by passing over the land. Starting from Holyhead the aim is to pass Carmel Head at or just after Low Water Slack, pass south of West Mouse, pass south (the 'wrong' side) of the North Cardinal that marks Victoria Bank and North of the Harry Furlong starboard (green) mark that guards a reef that extends out from the headland at Cemlyn. By this time the sailor will notice the tide assisting quite strongly. Very shortly afterwards the vessel will be passing the entrance to the WND A MOLF Harbour. It would be very useful for recreational sailors to already know the intentions of any vessels, ships, barges, tugs or pilot boats that will be entering or egressing the MOLF Harbour area. Travelling in the opposite direction from Point Lynas is less navigationally challenging prior to crossing the WND A MOLF Harbour entrance. There are also anchorages that could be used if there was a need to stop to ascertain the intentions of vessels in the area of the WND A MOLF Harbour. However it would still be important to time arrival at Carmel Head at around Low Water Slack.

My experience would suggest that very few recreational sailors would use this coastline in moderate to strong winds from a northerly quarter (NW / N / NE) and Westerly winds against an ebb tide can also produce challenging conditions.

The applicant notes that the reason for the proposed increase in daily vessel movements in the non-material change is to catch up if situations arise where the deliveries are delayed. This could be due to scheduling problems, issues at off site construction sites and bad weather.

I note in APP-235 6.4.99 ES Volume D - WND A Development App D15-1 - Navigational Risk Assessment the summary of the Vessel Simulation Study carried out by BMT Argoss in 2016

- *All vessels can be safely berthed in wind conditions up to 30 knots from any direction.*
- *The most challenging approach is during the ebb tide.*
- *A set of lateral buoys marking an approach channel would limit the sea room available for manoeuvring and would not provide benefit to a vessel navigating to berth.*
- *A set of leading lights would provide the most useful indication of distance off track.*

- *A number of approach runs required the aid of a harbour tug to aid with passing the breakwaters and berthing.*
- *To maintain a vessels position at pilot station, a full sea going tug would be required.*

Has the applicant used historic weather data to estimate the number of days per year that the MOLF may not be available due to wind strength / sea state / wave height? If so, could the applicant note the location in the DCO documentation?

In reference to the BMT Argoss report summary:

Does the reference to the safe berthing of vessels in up to 30k of wind from any direction refer to gust or average wind strengths?

I have received responses to all my initial questions, however, there remain three aspects of the Shipping and navigation proposals that continue to be a concern to me as a recreational yacht owner who transits this stretch of water between Holyhead and Point Lynas fairly close inshore and those are:

1. The actual number of 'vessels' that will be entering or egressing the harbour.
2. The different communication methods with recreational craft that are proposed during the MOLF construction phase and the MOLF operational phase.
3. The reference to 'Diversion of Vessels'

1. The actual number of 'vessels' that will be entering or egressing the harbour.

The Request for Non-Material Change no 2 Marine Vessel Movements LR126-092018 p 47/48 records my original question number 5 from 26/08/2018 and the follow up question from 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?

Answer to original question

*"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."*

Follow up question

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.

Answer to follow up question

*"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 outbound). 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.*

*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.*

*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 secondary port. The size of vessels is also considerable smaller than cargo vessels resulting in smaller environmental footprint."*

I have examined the document Navigational Risk Assessment (Jacobs August 2017) APP-235 6.4.99 ES Volume D - WNDA Development App D15-1 - Navigational Risk Assessment.

Figure 8. Recreational Transits through the Marine Works Area indicates the inshore recreational route that would be used by many smaller craft. This would be similar to my preferred route when sailing between Holyhead and Point Lynas. As noted in the Risk Assessment, whilst some of these smaller craft will have an AIS transceiver that both receives and transmits, a significant proportion will only have AIS receivers or no AIS at all. Could the applicant indicate the uplift that was used to take account of this when preparing the shipping and navigation assessment?

The final paragraph of the applicant's answer to Q5 above indicate that port service craft have not been considered as movements for the shipping and navigation assessments. As it is likely that the port service craft will rendezvous and release at a latitude and longitude near to or north of the popular inshore recreational route then I consider this may be a significant omission. In the context of Q5 the size of the vessel is irrelevant.

2. The different communication methods with recreational craft that are proposed during the MOLF construction phase and the MOLF operational phase.

The Request for Non-Material Change no 2 Marine Vessel Movements LR126-092018 p 46/47 records my original question number 3 from 26/08/2018 and the follow up question from 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 vessel (ship and tug) movements? What VHF channel do the LPS propose using?

Answer to original question

*"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 dedicated VHF channel. Details of this would be available in the Admiralty List of Radio Signals (ALRS)."*

Follow up question

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.

Answer to follow up question

I have no record of receiving an answer.

However, in APP-235 6.4.99 ES Volume D - WNDA Development App D15-1 - Navigational Risk Assessment and APP-133 6.4.15 Volume D – Shipping and navigation, details of mitigation are recorded for the proposed MOLF Construction phase and the proposed MOLF Operational phase. The details differ in the two documents, it is not clear when the Local Port Service (LPS) will be established and in use, and a reference to the following is noted in one document (APP-235) but not the other (APP-133) - “... the provision of LPS which will act as a central contact point for the Harbour that will be able to supply information on vessel movements to any vessels navigating through the area, ....”

Could the applicant confirm that:

- the LPS will be established at the commencement of MOLF Harbour construction and be active for the duration of MOLF construction and MOLF operation, and
- the LPS will, on request, supply information on vessel movements (ships, barges, tugs, pilot boats etc) to any vessel navigating through the area.

### 3. The reference to ‘Diversion of Vessels’

Finally, there are the following references in APP-235 to Diversion of vessels during the MOLF Construction and MOLF Operational phases.

#### MOLF Construction Phase

##### Diversion of Vessels (APP-133)

*“15.5.24 The dredge and construction operations carried out as part of the Marine Works and resultant transit routes to and from the Wylfa Newydd Development Area would result in recreational and fishing vessels, which currently navigate within that area, being diverted into areas where larger vessels navigate. These larger vessels would be temporarily diverted either further offshore, or more likely a timing delay would occur to vessel transits, to avoid crossing paths, thereby avoiding potential collision situations.”*

#### MOLF Operational Phase

##### Diversion of Vessels (APP-133)

*“15.5.40 Transit routes to and from the Wylfa Newydd Development Area would result in recreational and fishing vessels that currently navigate within that area being diverted into areas where larger vessels navigate. These vessels would be temporarily diverted either further offshore, or more likely a timing delay would occur to vessel transits, to avoid situations where paths may cross.”*

Could the applicant expand on the meaning, purpose and likely impact of these proposals on recreational craft?

I note that a timetabled slot to discuss the MOLF proposals has been agreed. If you require further detailed information please contact me.

END – Written Representation – Shipping and navigation