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To: [Wylfa Newydd](#)
Subject: Wylfa Newydd DCO EN010007, Deadline 3, Additional comments by National Trust
Date: 18 December 2018 11:14:35
Attachments: [image001.png](#)
[1011 BN09 Heritage Assets Plans.pdf](#)

Wylfa Newydd Development Consent Order, EN010007.

Comments by National Trust at Deadline 3.

1. Response to **Q6.0.17.** Please find attached further consideration of the submitted heritage asset plans.
2. Supplementary Information on Coastal Processes to Support Wylfa Newydd EIA and Shadow HRA. The following commentary is provided on the revised report (**REP2-007**)

The submitted report has not addressed the concerns / questions raised. The supplementary report itself is contradictory – many of the statements made in the text simply do not tally with the model output figures presented. Those statements which maintain there is no need for sediment characterization are both inaccurate and misleading.

Table 2 of the supplementary coastal processes report presents a summary of particle size characteristics for the Esgair Gemlyn beach face which is based on Table 7 in our (KPAL) 2010 report to the National Trust. No data were provided in that report for the lower beach flat which is exposed when tides fall below approximately mean tide level. Horizon have used our 2010 data to conclude that the lower beach / nearshore area to seaward of the ridge is dominated by sandy fine gravel, when in fact it is composed largely of well sorted fine sand, with a D50 of 0.130 – 0.150 mm, as documented in the more recent (November 2018) report No. 181118. Hence the conclusions drawn by Horizon in relation to the critical bed shear stresses for sediment movement in this area are in error. The fine sand is potentially highly mobile under combined wave and tidal current action.

Figure 7 in the supplementary coastal processes report indicates the difference in bed shear stress which is predicted by Horizon's combined wave and tidal modelling for a spring tide mid-ebb plus 99th percentile wave condition, without and with the marine works. The offshore approach direction and period of the P99 wave are not stated, but taken at face value the Figure shows an increase of 0.5 – 1.0 N/m² in the bed shear stress close to the Esgair Gemlyn ridge in the western part of Cemlyn Bay as a result of the development. However the accompanying text suggests an increase only of up to 0.5 N/m². Table 1 of the supplementary report indicates a critical bed shear stress for featureless sand with a D50 size of 0.1 to 1 mm of 0.1 to 0.5 N/m². The predicted increase in bed shear stress as a result of the development is therefore 5 to 10 times larger than the critical bed shear stress required to mobilize the fine sand which occurs immediately to seaward of the Esgair Gemlyn ridge. The modelling results (e.g. Figure 7) also show that on a spring ebb tide with waves there is an anticlockwise current gyre within Cemlyn Bay which would be expected to move sediment away from the northwestern part of the bay towards the southeast, and potentially towards the outer part of the bay and the western breakwater.

3. Codes of Construction Practice.

In order to review future versions of the Codes and Sub Codes of Construction Practice: **REP2-031**,

REP2-032 and REP2-033, it would be helpful for Horizon to provide fully marked up tracked change versions of the document to enable review of changes in addition to the completed version to enable the changes to be easily identified.

Thank you for your consideration.

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Landscape Briefing Note 9 -
DCO Application: Deadline 2: Heritage Assets Plans

Project: 1011 Wylva Newydd Nuclear Power Station

Date: 16th December 2018

Doc Ref: 1011 BN09 Heritage Assets Plans .docx

Introduction

1. This Briefing Note has been prepared with regard to the Plans produced by Horizon in response to the request from the Examining Authority (Q6.0.17) to prepare a plan at scale 1:1250 of the area from Porth-y-Pistyll extending south to Cemlyn Road showing the location of heritage assets and to show '*(a) the works planned for this location during site preparation and clearance and construction; and (b) the situation during the operation period, accurately plotting the proposed boundary fences, the proposed line of the Welsh Coastal Path and the proposed landform and landscape.*' In addition, Horizon was requested to explain how the public would access these assets during construction operation and decommissioning.
2. Horizon's has produced three plans
 - *Dwg 60PO80AS_ Q6.0.17_ 01a Plan of Heritage Assets and public access with illustrative site Preparation and Clearance activities*
 - *Dwg 60PO80AS _ Q6.0.17_ 01b Plan of Heritage Assets and public access with illustrative main construction activities shown*
 - *Dwg 60PO80AS _ Q6.0.17_ 02 Plan of Heritage Assets and public access with illustrative operational layout*
3. The preparation of these larger scale, more detailed plans is welcomed. However they also raise a number of issues which are set out in the following paragraphs.
4. There are earthworks shown on *Dwg 60PO80AS _ Q6.0.17_ 01b illustrative main construction activities* and *Dwg 60PO80AS _ Q6.0.17_ 02 illustrative operational layout* north of Cemlyn Road close to the southernmost part of Cestyll Garden. It is unclear what these earthworks relate to as there are no earthworks in this area shown on the Landscape and Habitat Management Strategy (LHMS) *Figure 5-5 Illustrative landscape proposals during Main Construction* or *Figure 6-3 Illustrative plan of the restored landscape during site operation* (neither the original nor Revision 1).

5. The land immediately to the south of Cestyll Garden north of Cemlyn Road is keyed as '*Sympathetically managed agricultural grassland*'. On Figure 6-18 Proposed land use of Revision 1 of the LHMS this land is identified as '*Grazing land managed primarily for biodiversity*'.
6. The proposed access for Cestyll Garden during the construction period appears to have been retained during the operational period. This is not the historic access to Cestyll Garden and there appears to be no consideration of how changing this access might affect the historic significance of the Garden. The drawings do not show access for National Trust to the east of Cestyll Garden, currently the subject of discussion between National Trust and Horizon.
7. '*Broadleaf/mixed woodland*' is shown on *Dwg 60PO80AS _ Q6.0.17_ 02 illustrative operational layout* along the boundary with the Power Station Site, in particular east of the Garden, between it and an area of '*Coastal Heath/Grass Mosaic*'. It is not clear why the '*Broadleaf/mixed woodland*' is not planted at the start of the construction period as the area is not identified for any construction activities and is proposed for grazing land. Some of this area closest to the Garden has contained shelter belt planting but there has been significant tree felling within the shelter belt over the last year. The area of '*Coastal Heath/Grass Mosaic*' is proposed for '*Laydown / Other construction activities*' during the construction period so cannot be established until the construction period has ended.
8. Simply labeling an area as '*Laydown / Other construction activities*' does not fully answer the ExA request for details of '*the works planned for this location during site preparation and clearance and construction*'.
9. There are no boundary fences shown on *Dwg 60PO80AS _ Q6.0.17_ 01b illustrative main construction activities*.
10. *Dwg 60PO80AS _ Q6.0.17_ 02 illustrative operational layout* shows how close the double row of security fencing will come to the edge of Cestyll Garden.
11. The intention for *HLT2 - Cestyll Garden - Kitchen Garden and former site of Cestyll House* during the operational phase is unclear.
12. There is a dashed line that runs from the southernmost tip of Cestyll Garden initially south east and then south west which is not keyed.
13. Whilst these plans focus on the heritage asset this is also the area where there will be one of the closest residential receptors (Felin Gafnan Farmhouse). There was a suggestion by Horizon during a site visit (November 2017) that woodland might be planted between Felin Gafnan Farmhouse and Cestyll Garden to mitigate views of the construction and operational activities for the residents of Felin Gafnan Farmhouse. There is no woodland planting shown on these plans in this location.