

Wylfa Newydd Project

Horizon's Responses to Representations made on the Batch 2 RfNMC's

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Contents

1	Horizon's Responses to Comments made on Batch 2 Requests for Non-Material Changes	1
1.1	Introduction	1
1.2	Horizon's Detailed Responses to Stakeholder Comments	3

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1 Horizon's Responses to Comments made on Batch 2 Requests for Non-Material Changes

1.1 Introduction

- 1.1.1 Horizon considers that the majority of points have been raised by IPs previously in Deadline 5 responses on the RfNMC and/or during consultation on the proposed change. As such, Horizon has only sought to provide additional comments in this document. This document therefore should be read alongside the summary consultation tables in each of Horizon's Change Requests submitted at Deadline 4 [REP4-011, REP4-012, REP4-013].
- 1.1.2 Note that NRW confirmed at Deadline 5 that its comments remain the same as those submitted at Deadline 3 and responded to as part of the formal change requests submitted at Deadline 4.

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1.2 Horizon's Detailed Responses to Stakeholder Comments

RfNMC	Ref.	Question/Comment	Horizon's Response to Question/Comment
3. Shift Patterns & 4. Working Hrs	D5-2	IACC consider that insufficient information on the impacts of the proposed changes to working hours and shift patterns is provided to allow the IACC to accept the assessments of impacts presented.	<p>Please refer to Horizon's responses in Appendix 1-6 of RfNMC No.3 [REP4-011] and Appendix 1-5 of RfNMC No.4 [REP4-012].</p> <p>Horizon has undertaken detailed modelling work to inform the impact assessments in order to determine any potential changes to the Draft DCO application. The modelling and assessment work for the candidate changes has followed the same approach taken in the Draft DCO application and Horizon considers that sufficient information has been provided to determine if any new or different likely significant environmental effects are generated. Following previous feedback of this nature, Horizon provided noise propagation figures in Appendix 1-7 of the Working Hours RfNMC No.4 submitted at Deadline 4.</p>
4. Working Hrs	D5-3	IACC objects to the changes to the working hours when considered cumulatively. IACC believes the proposed changes to the working hours constitutes a significant increase in construction activities over a 24-hour period which will have an unacceptable adverse impact on both environmental and human receptors. The proposed working hours conflict with construction times as recommended within British Standard's such as BS6472-2:2008 Guide to evaluation of human exposure to vibration and BS 5228-1:2009 Code of practice for noise and vibration control on construction and open sites. The change to working hours would result in the intensification of works on site which would constitute an unacceptable adverse impact on residential amenity of the local population in terms of noise and vibration.	<p>Please refer to Horizon's response in Appendix 1-5 of RfNMC No.4 [REP4-012].</p> <p>Horizon would also like to draw IACC's attention to Horizon's response to ExA's further written questions [REP5-002] submitted at Deadline 5 on 12 February 2019 as follows:</p> <ul style="list-style-type: none"> (1) SWQ. 2.13.21 - which further explains the exact period and activities to which the proposed change to working hours will apply, as aligned to the DCO overall project construction timeline. (2) SWQ. 2.13.5 - which clarifies shift working arrangements. <p>Furthermore, Horizon does not agree with IACC's interpretation of BS 5228-1:2009+A1:2014 (Code of practise for noise and vibration control on construction and open sites). The statement that the proposed working hours conflict with construction times as recommended in the above is not correct. In particular, Clause 7.3 - Execution of Works provides guidance on measures which should be taken including:</p>

RfNMC	Ref.	Question/Comment	Horizon's Response to Question/Comment
			<p>“7.3 Execution of works</p> <p><i>All available techniques should be used to minimize, as far as is appropriate, the level of noise to which operators and others in the neighbourhood of site operations will be exposed. Measures which should be taken include the following:</i></p> <ul style="list-style-type: none"> a) <i>The hours of working should be planned and account should be taken of the effects of noise upon persons in areas surrounding site operations and upon persons working on site, taking into account the nature of land use in the areas concerned, the duration of work and the likely consequence of any lengthening of work periods.</i> b) <i>Where reasonably practicable, quiet working methods should be employed, including use of the most suitable plant, reasonable hours of working for noisy operations, and economy and speed of operations. Site work continuing throughout 24 h of a day should be programmed, when appropriate, so that haulage vehicles will not arrive at or leave the site between 19.00 h and 07.00 h. On tunnel sites, for example, it is common practice to provide night time storage areas for soil and debris.</i> c) <i>Noise should be controlled at source and the spread of noise should be limited, in accordance with Clause 8.</i> d) <i>On-site noise levels should be monitored regularly, particularly if changes in machinery or project designs are introduced, by a suitably qualified person appointed specifically for the purpose. A method of noise measurement should be agreed prior to commencement of site works. If this is not specified, the method used should be one of those described in Annex G.</i> e) <i>On those parts of a site where high levels of noise are likely to be a hazard to persons working on the site, prominent warning notices should be displayed and, where necessary, ear protectors should be provided (see also Clause 5).</i> <p><i>When potential noise problems have been identified, or when problems have already occurred, consideration should be given to the implementation of practicable measures to avoid or minimize those problems. Local authorities, consulting with developers and their professional advisers or with site operators, will need to consider the extent of noise control measures necessary to prevent the occurrence of significant problems, and will also need to consider</i></p>

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			<p><i>whether the implementation of those measures will be practicable. Local authorities might wish to consider whether to specify quantified limits on site noise and whether, additionally or instead, to lay down requirements relating to work programmes, plant to be used, siting of plant, periods of use, working hours, access points, etc. The latter approach will often be preferable in that it facilitates the monitoring of formally or informally specified requirements, both for the authorities and for the site operators."</i></p> <p>Horizon has fully considered the requirements of BS 5228-1:2009+A1:2014 in presenting its position with respect to the extended Working Hours as presented in the RfNMC and by means of extensive review of the noise modelling inputs and outputs, Horizon is satisfied that compliance with the stated British Standards can be demonstrated. The control of noise on the project will be covered by the Control of Pollution Act 1974 which will provide IACC with the necessary powers to ensure that Horizon fulfils this commitment.</p> <p>In respect of blasting (and the recommendations in BS6472-2:2008), Horizon has considered feedback from IACC during the consultation process, and in response will commit to achieving a vibration level of 4.5mm/s PPV outside residences for 95% of blasts during the period 18.00-19.00. This change has been made in the Main Site Sub-CoCP submitted at Deadline 5 [REP5-022].</p> <p>In respect of the proposed changes to Working Hours for other activities, noise modelling and assessment using the same methodologies as used for the DCO application indicate that there would be an increase of 28 (2.4%) in the number of receptors at which a moderate adverse effect occurs, but there would also be 79 fewer dwellings at which a major adverse effect is predicted.</p> <p>To mitigate the effects of increased construction noise during the evening and night, Horizon has lowered the eligibility criteria and extended the mitigation measures that may be provided by the Local Noise Mitigation Strategy (LNMS). Further information on the improvements to this scheme are set out in the Local Noise Mitigation Strategy Update [REP3-050] submitted at Deadline 3, and it is recommended also to read the LNMS Companion Guide [REP3-051] (also submitted at Deadline 3) which provides additional information on how the strategy will be operated.</p>

RfNMC	Ref.	Question/Comment	Horizon's Response to Question/Comment
3. Shift Patterns	D5-4	<p>The 'non-material change No 3: Shift Patterns' notes that Horizon considers that the assessment of impacts is 'comprehensive and accurate'. IACC however disagree and submit that the change to these aspects has the potential to impact, on worker accommodation and housing stock in North Anglesey, which impacts have not been properly assessed. The number of workers working longer shifts is not detailed and the potential risk to their well-being as well as the community is not properly considered.</p>	<p>Please refer to Horizon's response in Appendix 1-6 of RfNMC No.3 [REP4-011].</p> <p>Horizon would also like to draw IACC's attention to Horizon's response to ExA's further written questions [REP5-002] submitted at Deadline 5 on 12 February 2019 as follows:</p> <ul style="list-style-type: none"> (1) SWQ. 2.13.1 - which explains why the proposed changes to work shift patterns is required (2) SWQ. 2.13.2 - which explains shift patterns and the proposed construction schedule (3) SWQ .2.13.3 - which explains to whom the change in shift patterns applies (4) SWQ. 2.13.4 - which explains the numbers of workers involved
5. HGV Movements	D5-5	<p>The IACC does not object to the change to the HGV delivery window provided that this does not take effect unless and until the A5025 offline works are completed and open to traffic and the limits on HGV movements proposed in the change are secured through the DCO.</p>	<p>Please refer to Horizon's response in Appendix 1-6 of RfNMC No.5 [REP4-013].</p> <p>The management and control of HGV movements is specified in Chapter 5 of the WN Code of Construction Practice (see Revision 3.0, submitted at Deadline 5 [REP5-020]). This includes controls on construction vehicle routes, vehicle caps per hour / day / month, and hours when movements are permitted, as well as HGV restrictions for both pre- and post-A5025 Off-Line Highway Improvements.</p> <p>It is recognised that perceived noise and emissions impacts are a key factor that requires to be addressed. However, the introduction of any requirement that restricts HGV movements until the A5025 Off-Line Highway Improvements are fully completed would result in significant delays to the Project (up to 2 years) which will directly affect Horizon's ability to deliver a viable project.</p>

RfNMC	Ref.	Question/Comment	Horizon's Response to Question/Comment
3. Shift Patterns & 4. Working Hrs	D5-6	Horizon has since clarified that the Existing Power Station access / A5025 junction is forecast to operate in capacity with the maximum demand being 84% of capacity showing that the junction has some space capacity (16%) and notes that any delays will occur for construction workers on the minor arm of the junction and hence delays would not be experienced by members of the general public. IACC wishes to point out that delays will still occur and there is no certainty that delays will not be experienced by the general public.	<p>Please refer to Horizon's responses in Appendix 1-6 of RfNMC No.3 [REP4-011] and Appendix 1-5 of RfNMC No.4 [REP4-012].</p> <p>The operation of the Existing Power Station access / A5025 junction can be regularly reviewed by Horizon and IACC as part of the monitoring strategy described in Section 5.10 of the Code of Construction Practice (Revision 3.0). The general public is not forecast to experience significant traffic delays at the junction but if such delays do regularly occur then this issue would be reported in the Construction Traffic Management Report which would be submitted on a quarterly basis to the Transport Engagement Group (para 5.11.3). Horizon, together with the Transport Engagement Group, would then consider implementing mitigation measures which could include altering the departure arrangements for construction workers at the end of their shift to reduce peak traffic demands at the junction. Further more substantial measures to address more serious traffic delay issues could include the IACC making changes to the layout of the junction using funds from the Transport (Additional Mitigation) Contribution (secured under the DCO s.106 agreement [REP5-007]) however the traffic modelling presented in the DCO application (see Table 1-33 of DCO Transport Assessment Appendix H Junctions Assessment [APP-109]) suggests that such changes will not be required.</p>
3. Shift Patterns & 4. Working Hrs	D5-7	IACC does not accept Horizon's position that the change requested does not generate any new or likely different significant environmental effects due to insufficient detail provided on the lighting impact assessment (i.e. photomontages, updated lighting modelling maps or indicative mapping of lighting positions). IACC therefore is unable to determine whether or not such lighting (particularly on the 6 new haul routes), is acceptable.	<p>Please refer to Horizon's responses in Appendix 1-6 of RfNMC No.3 [REP4-011] and Appendix 1-5 of RfNMC No.4 [REP4-012].</p> <p>As part of Request for Change no.4 Working Hours, there is a need to light haul routes to facilitate activities on mounds B1 and E respectively. Modelling has been undertaken to reflect the change and modelled vertical grids showing indicative lux levels from haul road lighting for various receptors can be found in Appendix 1.6 of the RfNMC.</p> <p>The basis of the modelling and assessment is set out in para 2.5.92 of the Request for Change document [REP4-011]. This chapter states the commitment for a maximum column height of 12m and 0 degrees of tilt to reduce light pollution which would be secured by the Wylfa Newydd CoCP if the change request is accepted. The results of the assessment undertaken can be found in Table 2-20.</p>

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			<p>Note that prior to commencement of works within the WNDA, Horizon will prepare and submit for approval an Overarching Construction Lighting Scheme for the WNDA.</p>
3. Shift Patterns & 4. Working Hrs	D5-8	<p>IACC remains of the opinion that the proposed working hours (10.5 for the day shifts and 10 hours for the night shifts) are long. IACC understand that similar working hours are currently applied for a proportion of the workforce which is currently engaged on the construction of the Hinkley Point C nuclear new build project. In accordance with the Working Time Regulations, workers would have to opt out of the standard requirement which restricts the normal working week to 48 hours.</p>	<p>Please refer to Horizon's responses in Appendix 1-6 of RfNMC No.3 [REP4-011] and Appendix 1-5 of RfNMC No.4 [REP4-012].</p> <p>Horizon also refers IACC to its response to the oral submissions made at the Open Floor Hearings held on 25 October 2018 [REP2-006] and written submissions received at Deadline 1 (13 November 2018) [REP2-006]. The report responds to submissions received from Roger Dobson (and Llanbadrig Community Council) in respect of the proposed working hours, see Table 2.1 - Issue /Topic - Working hours of construction workers (pages 15 -18) which provides a detailed response to this question.</p> <p>Please also refer to Horizon's response to ExA's further written questions [REP5-002] submitted at Deadline 5 on 12 February 2019 as follows:</p> <ul style="list-style-type: none"> (1) SWQ 2.13.5 - which clarifies activities and staff affected by the proposed shift patterns change (2) SWQ 2.13.6 - which clarifies matters relating to shift patterns and travel arrangements (3) SWQ 2.13.9 - which addresses the need for these changes before completion of the on and off-line highway works (4) SWQ 2.13.17 - which clarifies matters relating to the haul roads (5) SWQ 2.13.21 - which clarifies the timings of the works affected by the proposed changes <p>The changes to Shift Patterns do not change the quantum of hours of work required or the number of workers required to do it. There will therefore be no change to the number of workers on the project, and therefore no change to the number of workers needing accommodation. Were shorter shift lengths to be imposed, this could in some circumstances require a larger workforce and/or a longer construction period (depending on the precise nature of restrictions and whether individual workers could do more shifts).</p>

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3. Shift Patterns & 4. Working Hrs	D5-9	IACC acknowledge that travel to and from a fixed place of work is not typically included as working time. This issue is considered to be of importance because it may be a key driver for workers to seek the closest accommodation possible to the WNDA in order to minimise their overall travel time to and from work which may be uncompensated in financial terms.	<p>Please refer to Horizon's responses in Appendix 1-6 of RfNMC No.3 [REP4-011] and Appendix 1-5 of RfNMC No.4 [REP4-012].</p> <p>Please also refer to Horizon's responses to the ExA's further written questions [REP5-002], submitted at Deadline 5 on 12 February 2019, as follows:</p> <p>(1) SWQ 2.13.6 - Shift Start Times/Travel time Dalar Hir to WNDA. (2) SWQ 2.10.11 - TWA Cost information (justification for onsite facility).</p> <p>IACC has in this response acknowledged that this will drive the worker to seek the closest accommodation which will ultimately result in a worker preference to use the proposed onsite TWA facility, resulting in higher on site TWA utilisation factors, reduced buses on the roads network with consequential reduction in offsite transportation noise and emissions. IACC's statement therefore supports Horizon's justification for the development of the onsite TWA campus. Horizon's response to SWQ 2.10.11 provides information to underpin Horizon's assertion that the provision of the on-site TWA campus has significant commercial advantages over any offsite campus which would be in excess of 17 miles from the WNDA site.</p> <p>Horizon has also submitted a detailed post-hearing note to support justification of the onsite TWA [REP4-041].</p>

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3. Shift Patterns & 4. Working Hrs	D5-10	<p>Horizon's own estimate indicates that workers travelling across the Britannia Bridge to and from the WNDA will take approximately 1 hour to traverse across Anglesey before and after their shifts. IACC considers that this is a further reason why workers will choose to take up accommodation as close as possible to the Power Station Site. Anecdotal evidence as well as evidence from the Accommodation Monitoring Reports from the Hinkley Point C project, indicates that the number of workers taking up local accommodation has been substantially higher than predicted. Should this situation occur for the Wylfa Newydd Project there are likely to be adverse effects on the availability of accommodation within Anglesey and adverse effects on existing communities which have not been considered fully by Horizon to date. IACC also has concerns regarding the safety and welfare of individual workers that work long hours and also have significant journey times to and from the WNDA. Driver fatigue could be an issue with respect to the safety of other road users and pedestrians and this does not appear to have been taken into account by Horizon.</p>	<p>Please refer to Horizon's responses in Appendix 1-6 of RfNMC No.3 [REP4-011] and Appendix 1-5 of RfNMC No.4 [REP4-012].</p> <p>Horizon also wishes to clarify that the travel time of one hour stated is based on workers leaving home and travelling to the Park and Ride facility where they will then get on a shuttle bus to complete the journey to the WNDA. This includes a short waiting time at the Park and Ride facility assuming that buses will be scheduled to depart at regular intervals to minimise overall worker travel time delay. Those workers who meet car share criteria may be allowed to travel direct to the WNDA site and park at site. In these cases the travel time is likely to be slightly reduced.</p> <p>In response to IACC's concerns over driver fatigue and working hours, please refer to [REP2-006] which specifically covers this point and details the measures necessary to be implemented to mitigate this risk (see in particular Table 2.1 - Issue /Topic - Working hours of construction workers (pages 15 -18))"</p>
3. Shift Patterns & 4. Working Hrs	D5-11	<p>IACC considers that Horizon should address the issues identified above and refer to relevant evidence with respect to the behaviours exhibited by the Hinkley Point C workforce as an indication of how the HNP workforce can be expected to respond to the shift patterns and working hours that are proposed.</p>	<p>Horizon does not consider that it would not be appropriate to evidence behaviours exhibited at Hinkley as the project location and delivery strategy are different.</p>

RfNMC	Ref.	Question/Comment	Horizon's Response to Question/Comment
5. HGV Movements	D5-12	<p>The proposed extension to HGV Movements (Monday to Friday 19:00 - 23:00 and Saturday 08:00 - 13:00) would result in a total of 85 hours per week being available for HGV deliveries instead of the currently proposed total of 60 hours per week as per the DCO application. IACC identifies a conflict in timings proposed for HGV movements along the A5025 particularly during sensitive periods for residents who are more likely to be at home. IACC believes this is to be an unacceptable impact without adequate measures being in place to ensure impacts are reduced during these times on the road network. IACC requires firmer commitment from Horizon to coordinate HGV movements on both projects in an effort to reduce impacts and secure mitigation for the impacts of this change.</p>	<p>Please refer to Horizon's response in Appendix 1-6 of the RfNMC No.5 [REP4-013].</p> <p>The management and control of HGV movements is specified in Chapter 5 of the Wylfa Newydd Code of Construction Practice (Revision 3.0). This document already includes sufficient controls on construction vehicle routes, vehicle caps per hour / day / month, and hours when movements are permitted. In Llanfachraeth, to further mitigate traffic impacts in the early years, Horizon will undertake minor works to repair ironworks and potholes, manhole covers and provide other minor kerb works and white lining to improve the road surface and smooth passage of vehicles (such works being secured via the draft DCO s.106 agreement). Eligible properties can also apply for noise insulation through the Local Noise Mitigation Strategy (detailed and secured under the Wylfa Newydd CoCP).</p> <p>See also Horizon's response to ExA's further written questions [REP5-002] submitted at Deadline 5 on 12 February 2019 as follows:</p> <ul style="list-style-type: none"> (1) SWQ 2.13.9 - which addresses the need for these changes before completion of the on and off-line highway works (2) SWQ 2.13.10 - which addresses HGV numbers (3) SWQ 2.13.11 - which addresses matters relating to HGV movements and construction programme flexibility/resilience (4) SWQ 2.13.12 - which address noise effects and noise insulation (5) SWQ 2.13.13 - which address night time noise effects
5. HGV Movements	D5-13	<p>IACC considers that the argument made for the amendments to the shift patterns in terms of 'improving road safety and community impacts' has a direct conflict with the justification for the extended HGV movement hours proposed. This extension of HGV travel movement's results in an additional 5 hours during the evening when levels of lighting will be at their lowest and when residents are resting. In line with other justification for improving safety and community amenity, IACC therefore reiterates its suggestion</p>	<p>Please refer to Horizon's response in Appendix 1-6 of the RfNMC No.5 [REP4-013].</p> <p>As part of the mitigation package associated with the Wylfa Newydd DCO Project, Horizon will fund a road safety campaign with IACC and the North Wales Police. Details of this campaign are specified in the draft DCO s.106 agreement [REP5-007]. Other mitigation measures include the A5025 Off-line Highway Improvement Works and the A5025 On-line Highway Improvement Works (secured under Schedule 1 of the draft DCO and through a separate planning permission). This mitigation is considered to be sufficient to manage the potential road safety impacts of the Project.</p>

RfNMC	Ref.	Question/Comment	Horizon's Response to Question/Comment
		<p>to increasing the period for HGV movements on a Saturday to be consistent with the weekday times which would result in vehicles travelling in daylight.</p>	<p>See also Horizon's response to ExA's further written questions [REP5-002] submitted at Deadline 5 on 12 February 2019 as follows:</p> <ul style="list-style-type: none"> (1) SWQ. 2.13.1 - which explains why the proposed changes to work shift patterns is required (2) SWQ. 2.13.2 - which explains shift patterns and the proposed construction schedule (3) SWQ. 2.13.3 - which explains to whom the change in shift patterns applies (4) SWQ. 2.13.4 - which explains the numbers of workers involved <p>With regards increasing the period for HGV movements on the Saturday:</p> <p>The proposed extended period for HGV deliveries provides for 20 additional delivery hours during the working week (five evenings with four additional hours per evening) and five additional hours on a Saturday (08:00 – 13:00). This gives 25 additional delivery hours for HGVs across the week. If the extended hours only occurred on a Saturday and were extended as suggested by IACC then potentially 11 additional hours could be provided (08:00 – 19:00). This is less than the 25 additional hours proposed by Horizon, and Horizon considers that only having 11 additional hours would not provide the flexibility sought to ensure the efficient delivery of the Project.</p> <p>In addition, the aim of providing additional hours each weekday evening is to provide additional flexibility in the delivery programme to deal with day-to-day issues: there is a benefit to extending the weekday hours past 19:00 versus moving more movement to Saturday. During the week those vehicles that end up delayed or arriving later in the day are then capable of being serviced on the day they arrive, versus being held over till the next day. In effect this allows greater flexibility on spreading the vehicles over a longer period in the afternoon hours such that the vehicles will not need to either stay on site or delay entry to the site. In addition, this will help eliminate a cascading effect pushing deliveries on subsequent days. Saturdays (weekends) will always be a reduced work schedule and increasing deliveries on Saturday past 13:00 and not extending on weekdays is less efficient than the increase in flexibility during the week.</p>

RfNMC	Ref.	Question/Comment	Horizon's Response to Question/Comment
5. HGV Movements	D5-14	<p>IACC recognises that traffic volumes are lower during the evening period (19:00-23:00), however it would note that receptors may be more sensitive to an increase in HGV movements due to the low baseline traffic levels (IACC traffic surveys confirm zero HGV movements occur on certain weekdays during the evening period). Extending the weekday delivery window into the evening will significantly reduce the time-period of zero HGV or bus traffic movements, which will adversely affect the amenity of existing residential properties adjacent to the A5025. IACC does not consider that the proposed changes are acceptable until the A5025 Offline improvements are completed.</p>	<p>Please refer to Horizon's response in Appendix 1-6 of the RfNMC No.5 [REP4-013].</p> <p>The noise assessment undertaken for the proposed change to HGV movements considers the change in noise level during the period 19:00 to 23:00, using the classification of magnitude of noise impacts in the short term which are set out in Table 3.1 of the Design Manual for Roads and Bridges Volume 11 Section 3 Part 7 (HD 213/11). The noise assessment first considers whether the overall noise level at a dwelling exceeds 50 dB LAeq,16-hours over the period 07:00 to 23:00; this threshold is taken from the World Health Organization 1999 Guidelines for Community Noise which state that "During the daytime, few people [...] are] moderately annoyed with LAeq levels below 50 dB". If the daytime noise level is above this threshold, then the change in noise levels during the evening period is considered. The change in noise levels compares the road traffic noise levels during the period 19:00 to 23:00 with and without the project HGVs, and so the lower evening time traffic volumes are taken into account in the assessment methodology.</p> <p>Horizon considers the criteria used for the noise assessment are robust and in line with best practice, and reiterates that the potential increase in number of properties at which significant effects is predicted is modest (12 properties, which is a 4% change) and the properties affected are likely to qualify for mitigation through the LNMS.</p> <p>As discussed above, current road traffic noise assessment methods focus on (1) the change in noise levels at properties, and (2) whether any guideline levels in respect of health effects will be exceeded. The noise change categories and absolute thresholds adopted for the assessment are based on scientific evidence on the noise levels at which the onset of adverse effects are observed. By contrast, a threshold of 'zero HGV or bus traffic movements' on the A5025 during any periods of the day (or night) is not supported by literature, and therefore Horizon considers that adopting this as a measure by which the proposed change in HGV movements is assessed would be both unreasonable and arbitrary.</p>

RfNMC	Ref.	Question/Comment	Horizon's Response to Question/Comment
Cumulative	D5-15	<p>As set out in advice note 16, a series of incremental changes can cumulatively amount to a material change to the application. IACC consider that the proposed changes when taken into consideration together have the potential to materially change the impacts and are cumulatively a Material Change to the DCO Application. The IACC accepts that the changes proposed do not fundamentally alter the substance of the proposal in the terms of advice note 16. However, IACC considers that these changes will result in a material change to the impacts assessed in the ES and require not only full assessment of the impacts by Horizon, including the provision of other environmental information considering all of the changes together, but also the opportunity for IACC (and others) to consider, assess and respond.</p>	<p>Horizon has provided an assessment of the cumulative impacts from all the Request for Non-Material Changes in the appendix. The appendix (which is attached – in duplicate form – to RfNMC docs 3, 4 and 5) sets out an assessment of the effects of all proposed non-material changes to the cumulative assessment reported in the Draft DCO application.</p> <p>The purpose is to assess whether the proposed changes could interact to result in the Wylfa Newydd DCO Project having a greater cumulative effect to that reported in the DCO application. The effect of each separate request for non-material change on the cumulative assessment reported in the DCO application has been assessed and reported within the standalone candidate for change documents.</p> <p>The details of the proposed changes have been carefully considered in isolation to ensure that the change can be undertaken with minimal environmental effects resulting in no new or different likely significant environmental effects. Where there is considered potential for new or different effects to occur as a consequence of the proposed change, new and/or enhanced mitigation has been proposed to enable an overall conclusion of no new or different likely significant environmental effects to be reached.</p> <p>As per the cumulative assessment set out in the Draft DCO application, cumulative impacts from all the Request for Non-Material Changes have been considered at the receptor level - receptors originally identified in the draft DCO application as being impacted have been considered alongside any new receptors identified within the assessment of the Requests for Non-Material Changes. The cumulative assessment has considered all residual effects that are minor adverse or greater. Overall, cumulative effects from each change have been considered in detail and Horizon also concludes 'no new or different likely significant environmental effects' as a result of all three proposed changes.</p>

RfNMC	Ref.	Question/Comment	Horizon's Response to Question/Comment
Cumulative	D5-16	<p>"IACC consider the proposed changes to the DCO application as being material as they will change the impacts of the project (individually and cumulatively). Contrary to Horizon's assessment of impacts of the proposed changes, IACC believes that the impacts have not been adequately assessed as part of the DCO application process. Given the materiality of these changes, presenting these changes as 'non-material' is unacceptable. Without prejudice to the IACC's position on materiality, and having regard to the detail set out in this response the IACC:</p> <ul style="list-style-type: none"> • objects to the Request for Non-material Change No. 3: Shift Patterns; • objects to the Request for Non-material Change No. 4: Working Hours; and • does not object to Request for Non-material Change No. 5: HGV Movements provided that these do not take effect unless and until the A5025 offline highway improvements are completed and open to traffic." 	<p>Horizon considers the assessments to be robust in their determination of non-materiality for the reasons set out in section 2 of the Requests for Non-Material Change documents, and agrees with NRW's view that there will not be new or different likely significant effects arising from the changes individually or cumulatively.</p>

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