

National Infrastructure Planning
Temple Quay House
Temple Quay
Bristol
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For the Attention of Ms Kay Sully

27 February 2019

DCRM Ref. No: WN0902-HZDCO-PAC-LET-00004

Dear Ms Sully

Wylfa Newydd DCO Project: Response to Procedural Decision

1. We refer to the Examining Authority's procedural decision to accept the five Requests for Non-Material Changes ("RfNMCs") published by the Examining Authority on 25 February 2019 [PD-014] ("procedural decision"). These RfNMCs related to:
 - a. Marine Vessel Movements and Blasting Strategy (referred to as "Batch 1"); and
 - b. Working Hours, Worker Shift Patterns and HGV Delivery window (referred to as "Batch 2").
2. As set out in its procedural decision, the Examining Authority has requested that Horizon submits revised application documents which incorporate these five accepted RfNMCs into Examination at Deadline 7 (14 March 2019).

Acceptance of Batch 1 RfNMCs

3. Although the procedural decision confirms the Examining Authority's acceptance of the Batch 1 RfNMCs, Horizon had understood that these had already been accepted by the Examining Authority on 31 October 2018. This reflected in the Rule 8 letter issued on 6 November 2018 [PD-010] and reiterated by the Examining Authority at the January Issue Specific Hearings ("ISH").

Request for additional time to update the DCO application

4. While Horizon acknowledges the need for the Examining Authority and other Interested Parties to have clarity on what the DCO application now constitutes, it respectfully requests that the deadline for submission of updated application documents is deferred to Deadline 8 (25 March 2019) to provide Horizon with sufficient time to make the necessary amendments.
5. The key reasons for Horizon seeking this deferral are that in order to reflect the Batch 1 and 2 RfNMCs within the application documents, Horizon will need to revise a wide range of existing application documents (over 22), including the Wylfa Newydd CoCP, the sub-CoCPs, the Environmental Statement Addendum and associated assessments (i.e. Transport), as well as prepare new supporting appendices which detail the methodologies and assessment which support the findings outlined in the RfNMCs.
6. Currently, updated versions of these documents are all scheduled to be submitted at Deadline 8 in order to enable continued negotiations to take place with Interested Parties on other matters and to incorporate any amendments as a result of the March ISHs. It would be more preferable (and would avoid any potential confusion with multiple versions) for Horizon to submit all changes to these control documents at Deadline 8, rather than submitting RfNMC-related changes at Deadline 7, and then all other changes at Deadline 8 (just over one week later).
7. In addition, the two week timeframe that the Examining Authority has provided for updates coincides with the third week of Issue Specific Hearings (4–8 March). This places constraints on Horizon's ability to make the amendments by Deadline 7 given that the personnel responsible for completing the updates will all be involved in preparing for and attending the March ISHs.
8. In making this request, Horizon has carefully considered whether there would be any prejudice to any party or impact on the Examining Authority's ability to examine the updated application within the remaining examination period. Horizon does not consider that there would be any impact of delaying submission by one week to Deadline 8 as the RfNMCs have all been consulted on and subsequently held to be non-material by the Examining Authority. As a non-material change, the necessary amendments to the application documents will not be material and have already been clearly outlined within the change requests themselves. For example, in respect of the RfNMC relating to shift patterns, amendments required will be to detail the revised shift patterns and update the Environmental Assessment Addendum and the CoCPs to include the new mitigation (as identified in the change request).
9. In order to provide clarity to the Examining Authority at this stage, Horizon has included the consequential amendments that will be required for the RfNMCs in **Appendix 1**. These tables, which were included within the original change requests [AS-020 and AS-021; REP4-011 to REP4-013], demonstrate that the updates are non-material but are numerous and do run across a large number of evolving application documents that are scheduled to be amended and resubmitted at Deadline 8.

10. I would be grateful if the Examining Authority could confirm whether it will grant Horizon's request to defer its submission until Deadline 8. If we can be of any assistance in that regard, please do not hesitate to contact us on 0800 954 9516.



Kieran Somers

Head of Planning

Horizon Nuclear Power Wylfa Limited

Appendix 1
Consequential amendments to application documents

Table 1-1 RfNMC - Blasting

Application document name	Application Reference Number	Section of document	Version to be amended	Description of amendment
Environmental Statement appendix B6-2: Noise and Vibration Modelling and Assessment Methodology Report	6.2.21	5.5	1.0	Update to blasting schedule (i.e. working hours for blasting)
Environmental Statement chapter D1: Proposed development	6.4.1	1.6	1.0	Update to blasting schedule (i.e. working hours for blasting)
Environmental Statement chapter D9: Terrestrial and Freshwater ecology	6.4.9	9.5	1	Update assessment to include additional text provided in section Error! Reference source not found. of this document
Environmental Statement chapter D13: The marine environment	6.4.13	13.5	1.0	Update to blasting schedule (i.e. working hours for blasting)
Main Power Station sub-Code of Construction Practice	8.7	8.2	1.0	Update to blasting schedule (i.e. working hours for blasting)
Marine Works sub-Code of Construction Practice	8.8	4.2	1.0	Update to blasting schedule (i.e. working hours for blasting)

Table 1-2 RfNMC – Vessel Movements

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: Noise and vibration	APP-125	6.5	1.0	Update to noise modelling results
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

Application document name	Application Reference Number	Section of document	Version to be amended	Description of amendment
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

Table 1-3 RfNMC – Worker Shift Patterns

Application document name	Examination Reference Number	Section of document	Version to be amended	Description of amendment
DCO Transport Assessment	APP-101	Executive Summary	1.0	Update to shift pattern details in text and table 1-1
DCO Transport Assessment	APP-101	7.3, 11.4, 14.1	1.0	Update to shift pattern details and text relating to VISSIM results
DCO Transport Assessment – appendix I – VISSIM Model Results	APP-110	Throughout	1.0	Update to reflect proposed changes shift patterns and associated results
DCO Transport Assessment – appendix L – Supplementary information	APP-113	4	1.0	Update to shift pattern details
Environmental Statement chapter C3: Public access and recreation effects of traffic	APP-090	3.4, 3.5	1.0	Update to shift pattern details
Environmental Statement appendix C5-1: Operational road traffic input and output	APP-116	1.1, 3, 4	1.0	Update to traffic flows for the 2020 and 2023 scenarios, minor changes to noise levels and small changes to the exact numbers of properties in each category in the night-time columns of tables 4-1 to 4-5

Application document name	Examination Reference Number	Section of document	Version to be amended	Description of amendment
Main Power Station Site sub-CoCP	REP2-032	4.3	2.0	Update to shift pattern details
Logistics Centre sub-CoCP	REP-373	4.4	2.0	Update to shift pattern details
Environmental Statement chapter D1: Proposed development	APP-120	1.6	1.0	Update to shift pattern details
Environmental Statement chapter F1: Proposed development	APP-266	1.1	1.0	Update to shift pattern details
Design and Access Statement - Volume 3 - Associated Developments and Off-Site Power Station Facilities	REP2-029	1.6	2.0	Update to shift pattern details

Table 1-4 RfNMC – Working Hours

Application document name	Examination Reference Number	Section of document	Version to be amended	Description of amendment
Environmental Statement chapter D1 Proposed Development	APP-120	1.6	1.0	Update to table D1-7 and the general text which outlines the site operation hours.
Environmental Statement chapter D5: air quality (excluding emissions from traffic)	APP-124	5.5, 5.6 and 5.7	1.0	Update results (including those in the relevant tables), description of the proposed additional mitigation and the residual effects.
Environmental Statement appendix D5-2: Dispersion modelling of emissions to atmosphere arising from main site	APP-140	2.2, 2.3, 2.4 and 3, appendices A, D, E	1.0	Update modelling scenarios and input data, air quality modelling results and related dispersion isopleths.
Environmental Statement chapter D6 Noise and vibration	APP-125	6.4, 6.6 and 6.7	1.0	The construction noise assessment scenario would require amendment to reflect changes to the phasing of construction activities, and two additional scenarios for months 7-9 and 10-12 would need to be added. Additions to the commitments made in respect of the Local Noise Mitigation Strategy set out in table D6-32 would also be required. The property counts for residual effects within table D6-35 would require updating.
Appendix D6-1 Noise modelling inputs and results	APP-142	1.2, 2.0	1.0	Update to reflect amendments to the indicative plant list/schedule. Tables 2-1 through to 2-41 would require updates to reflect the results of the proposed change.
Environmental Statement chapter D9 Terrestrial and freshwater ecology	APP-128	9.5	1.0	Updates to air quality assessment of sensitive ecological receptors in light of the lower emitting plant, machinery and

Application document name	Examination Reference Number	Section of document	Version to be amended	Description of amendment
				marine vessels used rather than as a direct result of changes in working hours.
Environmental Statement chapter D9 Terrestrial and freshwater ecology	APP-128	9.5	1.0	Updates to noise assessment for chough, breeding birds (barn owl), and bats.
Environmental Statement appendix D10-10: Environmental Lighting Impact Assessment	APP-201	1.2	1.0	Update to figure 1-1 (Receptor Locations) to include newly identified potential receptors: Gof Isaf bat barn and the four new residential receptors.
Environmental Statement appendix D10-10: Environmental Lighting Impact Assessment	APP-201	1.4	1.0	Update to include a baseline description of newly identified potential receptors.
Environmental Statement appendix D10-10: Environmental Lighting Impact Assessment	APP-201	1.5	1.0	Update to table 1-4 and the following description to provide assumptions on the lighting of haul routes and the proposed change to working hours for each construction zone where relevant.
Environmental Statement appendix D10-10: Environmental Lighting Impact Assessment	APP-201	1.6	1.0	The construction effects would need to be updated to include the effects on the newly identified receptors, as well as the change in potential magnitude of effects as a result of the proposed change to working hours and associated lighting of haul routes.
Environmental Statement appendix D10-10: Environmental Lighting Impact Assessment	APP-201	1.7	1.0	Update to additional mitigation to include new proposed measures.
Environmental Statement appendix D10-10:	APP-201	1.8	1.0	Update to table 1-8 to include the additional receptors, to revise the

Application document name	Examination Reference Number	Section of document	Version to be amended	Description of amendment
Environmental Lighting Impact Assessment				potential magnitude of change where relevant and to include proposed additional mitigation.
Environmental Statement chapter D13: The marine environment	APP-132	13.5.34	1.0	Update to working hours for drilling activities (to be amended to state 24-hour operations as it currently states 07:00 to 19:00)
Environmental Statement Wylfa Newydd Development Area Development Figure Booklet – Volume D	APP-237	Figure D5-5 and D6-2	1.0	Update to reflect changes to haul road locations.
Environmental Statement Wylfa Newydd Development Area Development Figure Booklet – Volume D	APP-237	Figures D5-7 to D5-11	1.0	Updates to changes in nitrogen dioxide concentrations.
Environmental Statement Wylfa Newydd Development Area Development Figure Booklet – Volume D	APP-237	Figures D6-3 to D6-10	1.0	Updates to construction noise levels.
Environmental Statement chapter I4 intra-development cumulative effects	APP-387	4.2	1.0	Update to noise and vibration assessment.
Environmental Statement chapter I4: Intra-project cumulative effects	APP-387	4.2	1.0	Update to air quality modelling results.
Environmental Statement appendix I4-2: Project-wide and Wylfa Newydd Development Area development intra-project air quality assessment	APP-393	5	1.0	Update to air quality modelling results.
Environmental Statement chapter I5 inter-development cumulative effects	APP-388	5.2	1.0	Update to noise and vibration assessment.

Application document name	Examination Reference Number	Section of document	Version to be amended	Description of amendment
Health Impact Assessment Report	APP-429	D.2.16 and D.2.17	1.0	Revise air quality conclusions to negligible for the general population and minor adverse for sensitive groups. Some narrative discussion relating to this change may be appropriate.
Health Impact Assessment Report	APP-429	D.2.10 and D.2.11	1.0	Consider revising magnitude discussion and scoring to reflect lower nitrogen dioxide levels. Magnitude score may change from medium to small.
Health Impact Assessment Report	APP-429	D.3.26	1.0	Add further detail on the extended Local Noise Mitigation Strategy. E.g. in relation to wider area, replacement garden fences and compensation.
Health Impact Assessment Report	APP-429	D.3.30	1.0	Update number of residential receptors experiencing EIA major adverse significant effects from 321 to 257.
Health Impact Assessment Report	APP-429	Table P-1	1.0	Update summary table of effects in relation to air quality changes
Equality Impact Assessment	APP-434	7.2	1.0	Updates to numbers of residential receptors significantly affected by traffic noise.
Wylfa Newydd Development Area and Power Station Site Plans	REP2-018/019	N/A	2.0	Update the following figures to reflect changes to haul routes Wylfa Newydd Development Area Reference Points 1, 2, 3 and 4.
Wylfa Newydd Code of Construction Practice	REP3-042	4.3, 7.0, 8.0	2.0	Update description of working hours and the relevant management strategies related to the topic assessments where changes from the Draft DCO application have been identified.

Application document name	Examination Reference Number	Section of document	Version to be amended	Description of amendment
Main Power Station Site sub-CoCP	REP2-032	4.3, 7.0, 8.0	2.0	Update description of working hours and the relevant management strategies related to the topic assessments where changes from the Draft DCO application have been identified.
Marine Works sub-CoCP	REP2-033	4.3, 7.0, 8.0	2.0	Update description of working hours and the relevant management strategies related to the topic assessments where changes from the Draft DCO application have been identified.

Table 1-5 RfNMC – Heavy Goods Delivery Window Changes

Application document name	Examination Reference Number	Section	Version to be amended	Description of amendment
DCO Transport Assessment	APP-101	1.13, 7.5 and 7.6	1.0	Update to key assumptions of assessment (table 1-1) and the associated figures and text.
DCO TA appendix F – Integrated Travel and Transport Strategy	APP-107	7.5	1.0	Update to figures and associated text describing delivery windows
Environmental Statement chapter C3: Public access and recreation effects of traffic	APP-090	3.5	1.0	Update to basis of assessment and duration of effects.
Environmental Statement chapter C5: Noise and vibration effects of traffic	APP-092	5.5	1.0	Changes to the number of receptors predicted to experience significant adverse effects from construction traffic and details about the enhanced mitigation to reduce effects.
Environmental Statement chapter D1: Proposed development	APP-120	1.6	1.0	Update to HGV delivery windows.
Environmental Statement Road traffic-related effects (project-wide) Figure Booklet – Volume C	APP-119	Figures	1.0	Updates to noise levels/receptors in figures.
Design and Access Statement - Volume 1 – Project-Wide	APP-407	4.4	1.0	Update to HGV delivery windows.
Wylfa Newydd Code of Construction Practice	REP2-031	8.3	2.0	Updates to outline the extended commitments of the LNMS.
Draft Heads of Terms for Planning Obligations (Planning Statement Chapter 7 (APP-406)	APP-406		1.0	Addition of road safety campaign mitigation.
Health Impact Assessment Report	APP-429	C.3	1.0	Summary of additional detail within the LNMS and

Application document name	Examination Reference Number	Section	Version to be amended	Description of amendment
				how it would mitigate the HGV delivery window changes, including for properties affected before and after the opening of the A5025 Highway Improvements.
Health Impact Assessment Report	APP-429	C.5 and J	1.0	Inclusion of Road Safety Campaign and summary of the reasons for its inclusion prior to the opening of the A5025 Highway Improvements.
Equality Impact Assessment	APP-434	7.2	1.0	Updates to numbers of properties affected by traffic noise.