

Wylfa Newydd Project

Horizon's Response to Written Representation

- Michael Cominetti

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Examination Deadline 3

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1 Horizon's Response to Michael Cominetti Written Representation

1.1 Introduction

- 1.1.1 This report provides Horizon's response to the Written Representation submitted by Michael Cominetti at Deadline 2 (4 December 2018). For ease, cross-references are provided (where appropriate and feasible) and the response generally follows the structure and sequence of the written representation received. Horizon has endeavoured to respond to the key matters raised in this written representation. Where Horizon has not responded to a particular point or issue raised by an Interested Party, this should not necessarily be taken as agreement with that point
- 1.1.2 Horizon has endeavoured to respond to the key matters raised in this Written Representation. Where Horizon has not responded to a particular point or issue raised by an Interested Party, this should not necessarily be taken as agreement with that point.

1.2 Raises Concerns regarding the Cooling Water System Alternatives

- 1.2.1 The response by Michael Cominetti asks why the design of the cooling water system was chosen when alternatives would have less impact on fish migration.
- 1.2.2 Please see chapter D2 – Alternatives and design evolution [APP-121] which outlines the site selection process and design evolution for the Wylfa Newydd Development Area (WNDA) Development, and describes how design considerations, consultation responses and environmental constraints have influenced the decision-making process.
- 1.2.3 Horizon recognises that heat dispersal from thermal power stations can be achieved by direct cooling systems (once-through systems into surface water bodies), indirect cooling systems (air cooling systems), or a hybrid that combines both systems.
- 1.2.4 The suitability of both direct and indirect cooling systems was considered for the Power Station. As part of this appraisal, consideration was given to the Overarching National Policy Statement for Energy (EN-1), the National Policy Statement for Nuclear Power Generation (EN-6), the Integrated Pollution Prevention and Control (IPPC): Reference Document on the application of Best Available Techniques to Industrial Cooling Systems, and Cooling Water Options for the New Generation of Nuclear Power Stations in the UK (SC070015/SR3).
- 1.2.5 Ultimately, it was concluded that a once-through (direct) CWS using seawater abstracted from the Irish Sea was the best option for the proposed Power Station. Air cooling, with its associated costs in terms of efficiency loss, capital and land take, was discounted as less favourable given the availability of seawater afforded by the Power Station Site's coastal location.

1.3 Raises concern regarding the Effects of the Cooling Water System on the Marine Environment

- 1.3.1 Please see chapter D13 – The Marine Environment [APP-132] which includes an assessment of the effects of the Wylfa Newydd Project on the marine environment.
- 1.3.2 No significant effects in the WNDA have been identified from the assessment of the operation phase however; a number of minor adverse effects to marine receptors were identified. Whilst these are not significant effects, additional mitigation relevant to some of these effects have been proposed.
- 1.3.3 Impingement within the Cooling Water intake system is assessed as having a potentially minor adverse effect on river lamprey, European eel and Atlantic salmon. This assessment is primarily driven by the high value of these receptors, although the magnitude of impingement is predicted to be small. In addition, entrainment within the CWS may also have a minor adverse effect on ichthyoplankton of conservation and commercial importance.
- 1.3.4 Mitigation is secured through the Design and Access Statement (DAS) Vol.2 submitted at Deadline 2, and includes screens, a fish deterrent system and a fish recover and return system.
- 1.3.5 Horizon will also implement a monitoring programme for entrapment (impingement and entrainment) associated with the cooling water intake system. This will assess the effectiveness of fish protection measures embedded in the system during the operation of the Power Station, through a programme agreed with NRW, and enable any improvements to mitigation measures to be made where necessary. This additional mitigation is not considered to reduce the magnitude of change or significance of effect on river lamprey, European eel and Atlantic salmon however; further mitigating actions can be considered, in consultation with NRW, should monitoring identify potential issues.