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17 October 2018

Application Reference: EN010007

DCRM Ref. No: HNP-HZDCO-PAC-LET-00007

Dear Kay Sully,

Wylfa Newydd Project: summary of three additional requests for non-material change

1. As noted in the letter dated 16 October 2018 (Wylfa Newydd Project: Response to Examining Authority's Rule 6 Letter), Horizon Nuclear Power Wylfa Limited ("Horizon") writes to:
 - (a) submit two written requests for non-material changes ("RfNMC") to the Wylfa Newydd Development Consent Order Application ("DCO application") relating to the Blasting Strategy and Marine Vessel Movements; and
 - (b) advise the Examining Authority ("ExA") of three other non-material changes to the DCO application relating to shift patterns, Heavy Goods Vehicle ("HGV") deliveries and Main Site Working Hours that it is currently considering.

RfNMCs to Blasting Strategy and Marine Vessel Movements

2. Horizon appends two written RfNMCs to the DCO application for submission to the ExA (attached as **Appendix 1** and **2**¹). These are: an RfNMC to the Blasting Strategy and an RfNMC to the Marine Vessel Movements. Both of these changes underwent public consultation during August and September 2018. The RfNMCs set out the proposed changes, responses received during consultation and Horizon's response, and the environmental appraisal of the proposed changes against the relevant assessments submitted with the DCO application.
3. In assessing the proposed changes, Horizon has had regard to the advice contained in the Planning Inspectorate's Advice Note² and considers that they will not result in any new or materially different environmental effects than those assessed in the Environmental Statement submitted with the DCO application. The results of the other assessments submitted as part of the DCO application remain unchanged and the proposed changes do not alter the Project to

¹ Separate PDF copies have also been provided for publication.

² Advice Note 16: How to request a change which may be material (Version 2, March 2018)

such a degree that it is a materially different project. For these reasons, Horizon considers that the proposed changes are non-material.

4. Horizon would welcome the opportunity to discuss the timetabling of procedural decisions in respect of these RfNMCs at the Preliminary Meeting.

Other potential requests for change

5. As a result of discussions with the contractor appointed to project manage the construction of the Wylfa Newydd Project ("the Project"), Horizon has identified three additional non-material changes to the DCO application relating to Shift Patterns, HGV Deliveries and Main Site Working Hours.
6. In assessing the proposed changes, Horizon has had regard to the advice contained in the Planning Inspectorate's Advice Note and, following initial assessments, considers that they will not result in any new or materially different environmental effects than those assessed in the Environmental Statement or alter the Project to such a degree that it is a materially different project. For these reasons, Horizon's initial conclusions are that the proposed changes are non-material.
7. The detail of these changes is currently being finalised by Horizon with a view to having consultation documents ready for use early in Examination. However, in order to assist the ExA and provide the necessary information for the Preliminary Meeting, this letter provides a summary of each new change, as well as initial proposals for how the changes may be managed during the examination.
8. As with the first two RfNMCs, Horizon would welcome the opportunity to discuss these three proposed changes and the timetabling of related procedural decisions at the Preliminary Meeting.

Shift Patterns

9. During construction of the proposed Wylfa Newydd Power Station, day and night shifts will be necessary to meet the Project construction programme. The assumed shift timings and day/night splits as submitted in the DCO application are presented in table 1-1 of the DCO Transport Assessment (appendix C2-4, APP-101). It was assumed that there would be three staggered shifts in both the day and night time periods which would be in place throughout Main Construction.
10. The original shift start/finish times were selected to avoid increased traffic flows across Britannia Bridge during the busiest hours in the morning and evening peak periods (08:00-09:00 and 17:00-18:00). However, the shift times submitted as part of the DCO application result in an overlap between the day and night shifts which mean that the first three hours of each night shift is unproductive. This poses a significant challenge to construction productivity, by limiting the effective transfer of work from one shift to the other. Following submission of the DCO application, the construction contractor has reviewed the shift patterns in order to identify any changes that could be made to increase worker productivity and build greater resilience into the construction programme while ensuring adverse effects on Britannia Bridge are avoided.
11. This review identified a number of potential alternative shift patterns to those in the DCO application. Further modelling was undertaken accordingly to understand the environmental

impacts associated with the various options and any effects on traffic, particularly on the Britannia Bridge.

12. Through an iterative approach, a set of adjusted shift patterns has been identified which optimises worker productivity and builds resilience into the construction programme. Horizon is considering the following shift patterns:

Shift	Start/End times		
	DCO application	Proposed change (2020)	Proposed change (2023)
Day	07:00-17:00	07:00-17:30	07:00-17:30
	07:30-17:30	07:30-18:00	07:30-18:00
	08:00-18:00	-	08:00-18:30
	(i.e. 10-hour shifts)	(i.e. 10.5-hour shifts)	(i.e. 10.5-hour shifts)
Night	16:30-03:00	19:30-06:00	19:30-05:30
	17:00-03:30	-	20:00-06:00
	17:30-04:00	-	-
	(i.e. 10.5-hour shifts)	(i.e. 10.5-hour shifts)	(i.e. 10-hour shifts)

13. The proposed change has been reviewed and assessed against the relevant chapters and appendices of the Environmental Statement in order to identify any potential likely significant effects that would be new or materially different to those assessed in the DCO application. The adjusted shift patterns result in an improved or “no worse” environmental effect than that assessed under the DCO application and ensures adequate construction traffic control on Anglesey and at Britannia Bridge so as to avoid adverse effects on Britannia Bridge. Therefore, no new or different likely significant environmental effects are predicted to occur as a consequence of this proposed change.
14. In addition, all other assessments submitted as part of the DCO application remain unaffected by the proposed change. It is not anticipated that the proposed change alters the Project to such a degree that it is a materially different project. Furthermore, it is not anticipated that the proposed change to Shift Patterns will interact with any of the other non-material changes to produce any new or different likely significant environmental effects resulting from the interaction of these projects either in combination or cumulatively with any other projects.

HGV Deliveries

15. During construction of the Project, HGVs will be required for the transport of materials and equipment to site. For the purposes of the DCO Transport Assessment and related Environmental Impact Assessment, the DCO application assumes that HGV deliveries will be undertaken Monday to Friday between 07:00 and 19:00. The assumed HGV delivery windows and HGV numbers per month are presented in table 1-1 of the DCO Transport Assessment (appendix C2-4, Application Reference Number 6.3.14) as submitted in the DCO application.

16. Horizon is considering:
- (a) extending the weekday (Monday to Friday inclusive) delivery window into the evening, to include deliveries between the hours of 19:00 and 23:00 (limited to a maximum of 20 HGV movements); and
 - (b) seeking an additional delivery window on Saturday mornings between 08:00 and 13:00 (limited to a maximum 50 HGV movements).

17. The primary objective of this proposed change is to provide additional flexibility for delivery of materials and equipment in order to increase resilience in the Project construction programme, as it would result in a total of 85 hours per week being available for HGV deliveries (instead of the proposed 60 hours per week proposed in the DCO application).

18. As part of this change, Horizon is not considering a change to the total number of HGVs or the materials required to be delivered per month. Therefore, a peak at 160 HGVs per weekday or 3,500 HGVs per month would still represent the worst-case assessment scenario.

19. Horizon has undertaken an initial review and assessment of the proposed change against these relevant chapters and appendices of the Environmental Statement in order to identify any potential likely significant effects that would be new or materially different (either individually or cumulatively) to those assessed in the DCO application.

20. Initial assessments have indicated that no new or different likely significant environmental effects are predicted to occur as a consequence of this proposed change and all other assessments submitted as part of the DCO application would remain unaffected by the proposed change. In addition, it is not anticipated that the proposed change will alter the Project to such a degree that it is a materially different project or will interact with any of the other non-material changes to produce any new or different likely significant environmental effects resulting from the interaction of these projects, either in combination or cumulatively with any other projects.

Main Site Working Hours

21. During Main Construction of the proposed Wylfa Newydd Power Station, a number of different site operations will be required and Horizon has proposed to undertake them in the days and times stipulated in table D1-7 of chapter D1 (proposed development, APP-120) and secured in the Main Power Station Site sub-Code of Construction Practice (sub-CoCP) (APP-415). Most operations are assumed to be undertaken during the working hours 07:00-19:00 with specified exceptions, such as blasting, tunnelling and other operations.

22. Horizon is proposing the following changes to working hours:

- (a) extension of working hours to include 19:00–23:00 hours for temporary/permanent road construction and maintenance; and
- (b) extension of working hours to include 19:00–07:00 hours (i.e. extending to 24 hours a day) for the following general building and construction activities:
 - (i) rock drilling and preparation of charge boreholes required to support following day blasting activities;

- (ii) rock drilling/stuffing/pressure grouting to support soil nailing/shotcreting activities necessary to secure early excavation stability;
 - (iii) moving/repositioning excavated rock in the deep excavations;
 - (iv) increased operation of ventilation fans and dewatering pumps associated with outfall tunnelling activities (below ground);
 - (v) support operations (e.g., equipment/road maintenance (including haul roads), fuelling, dewatering, etc.);
 - (vi) MOLF construction (except dredging, for which 24-hour operation was already considered in the DCO application);
 - (vii) reinforcement bar cutting, bending, coupling and distribution.
 - (viii) site establishment (batching plant and facilities/utilities set-up);
 - (ix) miscellaneous construction operations (training, canteens, facilities management, etc.);
 - (x) non-nuclear safety, underground permanent plant commodity installation (water pipe, connecting services, firewater, etc.).
23. As a consequence of the proposed changes to working hours, a series of changes to the haul routes will be required to enable full utilisation of the proposed extended working window, without the creation of new or different likely significant environmental effects. Furthermore, to enable the Project schedule to benefit fully from the proposed changes to the working hours, and the subsequent changes to the haul routes, changes would also be required to the construction plant list/schedule as follows:
- (a) the inclusion of additional plant;
 - (b) changes to the assumptions related to the mound formation schedule; and
 - (c) related haul road movements.
24. The primary objective of the proposed change is to provide additional flexibility in the hours of site operations in order to meet the Project construction programme.
25. Horizon has undertaken an initial review and assessment of the proposed change against relevant chapters and appendices of the Environmental Statement in order to identify any potential likely significant effects that would be new or materially different to those assessed in the Wylfa Newydd DCO application.
26. Initial assessments have indicated that no new or different likely significant environmental effects are predicted to occur as a consequence of this proposed change and that all other assessments submitted as part of the DCO application remain unaffected by the proposed change. It is not anticipated that the proposed change alters the Project to such a degree that it is a materially

different project or will interact with any of the non-material changes to produce any new or different likely significant environmental effects resulting from the interaction of these projects either in combination or cumulatively with any other projects.

Cumulative assessment of the proposed changes

27. To assess whether all the proposed non-material changes could interact to result in the Project having a greater cumulative effect to that reported in the DCO application, a cumulative assessment is being carried out, the results of which will be provide in a stand-alone report.
28. Cumulative effects include both intra-project (resulting from the various developments that comprise the Project) and inter-project (resulting from the Project together with external projects) effects; these assessments are reported in volume I (cumulative effects) (App-384-397) of the submitted Environmental Statement.
29. Combined topic effects, also known as intra-development effects, occur when a single receptor is affected in more than one way by the same development. The relevant combined topic assessment (i.e. project wide effects) is reported in chapter C7 (App-094) of the submitted Environmental Statement.
30. As will be demonstrated in the cumulative assessment report, there are considered to be no new or different intra- and inter-cumulative effects to environmental receptors as a consequence of the proposed changes. Furthermore, there are considered to be no new or different combined topic effects as a consequence of the proposed changes. Consequently, the overall cumulative assessment of the Project remains as reported in the DCO application.

Next steps

31. Horizon intends to complete its final assessment of the proposed changes as soon as possible so that the proposed changes can be consulted on. The consultation documents will follow the template established by the Blasting Strategy and Marine Vessel Movements documents (as consulted upon in August and September 2018). These consultation documents will:
 - (a) describe the proposed changes being sought;
 - (b) set out environmental appraisals of the proposed changes including a table setting out the implications of the proposed change to the environmental assessments detailed in the DCO application;
 - (c) a statement on any new or different likely significant environmental effects (if any) of the proposed change; and
 - (d) a 'schedule of consequential amendments' will be provided, listing the original application documents (or parts thereof) which may be amended by Horizon should the ExA accept the proposed change.
32. Horizon's objective in compiling these consultation documents is to ensure that stakeholders have sufficient information to comment on the changes and, after consultation, for the ExA to make a decision on whether or not the proposed change may be accepted and therefore included into the examination of the DCO application.

33. Horizon intends to undertake full consultation on the proposed changes for a period of at least 28 days, commencing as soon as possible after the Preliminary Meeting on 23 October 2018. Preparations are underway to commence such a consultation accordingly, with a full proposal currently in development. As a minimum, Horizon expects that it will:
- (a) notify prescribed persons under section 42(a)-(d) of the Planning Act 2008, and any other person identified by Horizon as potentially affected, of the consultation process and invite their views;
 - (b) publicly notify the consultation over two successive weeks in a local newspaper (the Daily Post) and the London Gazette; and
 - (c) carry out targeted mail drops at residential addresses and erect site notices near the affected areas.
34. As the proposed changes do not require any 'additional land', Horizon does not consider that the consent of persons with an interest in the relevant land is required under the Infrastructure Planning (Compulsory Acquisition) Regulations 2010.
35. Due to the scheduled hearings and other demands of the examination process on stakeholders, it is not proposed to undertake 'roadshow' type events as part of the consultation, but instead undertake consultation on a written basis. Copies of the Consultation Papers will be publicly available at named locations and on the consultation website, www.horizonnuclearpower.com/consultation. The ExA may also wish to publish the Consultation Papers on the relevant section of the Inspectorate's website.
36. Following the consultation period, Horizon will revise the consultation documents to have regard to representations received. An updated document, will be submitted to the ExA as a formal written request for a non-material change to be considered for acceptance into examination by the ExA. It is anticipated that the earliest the second batch of RfNMCs could be submitted to the ExA is Deadline 3 (18 December 2018).
37. Horizon appreciates that the acceptance and appropriate procedure for the consideration and examination of all five proposed changes is entirely a matter for the ExA. However, if the ExA is minded to accept the proposed changes into examination, Horizon considers that there is sufficient time for Interested Parties to consider and make representations on the published proposed changes to the ExA and for any other procedural requirements to be met.

Further information

38. If you require any further information from Horizon in advance of the Preliminary meeting, please do not hesitate to contact me at the address below, or Alex Herbert at Alex.Herbert@Horizonnuclearpower.com.

Yours sincerely,



Kieran Somers
Head of Planning, Horizon Nuclear Power

APPENDIX 1 – REQUESTS FOR NON-MATERIAL CHANGES TO BLASTING STRATEGY AND VESSEL MOVEMENTS (FOR SUBMISSION)

