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BS1 6PN

For the Attention of Ms Kay Sully

**14 March 2019**

DCRM Ref. No: WN0902-HZDCO-PAC-REP-00332

Dear Ms Sully

**Wylfa Newydd DCO Project: Deadline 7 Matters**

1. This letter sets out Horizon Nuclear Power Wylfa Limited's ("Horizon") response to matters allocated to the Applicant for Deadline 7 as outlined in the Rule 8(3) and 13 – Variation to Timetable for the Examination letter published by the Examining Authority ("ExA") on 12 February 2018 ("Rule 8 letter").

**Matters contained within Horizon's Deadline 7 submission**

2. Given the publication date of the ExA's Hearing Action Points (12 March 2019), Horizon has prepared its Deadline 7 submission in accordance with the Rule 8 letter and the additional information requested by the ExA and recorded by Horizon at the Issue Specific Hearings ("ISHs") held on 4 to 8 March 2019. Horizon is submitting the documents listed in Appendix 1 to the ExA for Deadline 7. Further comments in respect of these documents are set out below. Horizon will review the Hearing Action Points documents and respond further at Deadline 8 (25 March 2019).

**Summary of documents Horizon is submitting at Deadline 7**

3. Below is a short summary of the documents that Horizon is submitting at Deadline 7 (as identified in Appendix 1):
  - a. *Response to Hearing Requests for Information:* Following requests for information by the ExA during the ISHs held on 4 to 8 March 2019, Horizon is submitting a response document at Deadline 7. For ease, Horizon is submitting a single document that contains

Deadline 7 responses to actions raised across all of the March hearings, 4 to 8 March 2019 inclusive. Horizon intends to provide a further response document at Deadline 8 to supplement this information.

Horizon notes that a number of the actions outlined in the ExA's action lists from the March ISHs (published 12 March 2019) relate to the draft DCO. Horizon confirms that these matters will be reflected in the draft DCO submitted at Deadline 8.

- b. *Submissions of Oral Cases*: Horizon is submitting summaries of its oral case as presented at the ISHs held on 4 to 8 March 2019;
- c. *Proposed Security Articles 83 and 84*: Following a request from the ExA during the ISH held on 6 March 2019, Horizon is submitting a response document that outlines its position on the new articles 83 and 84 that were advanced during the DCO ISH. In addition to responding to the matters raised by the ExA in the actions list, this note also responds to the amendments sought by the Welsh Government.
- d. *General Glossary*: Further to its original submission, Horizon is submitting an updated General Glossary that takes into account key terms defined following submission of the DCO application.
- e. *Horizon's Responses to ExA's Questions from the ASI*: Following the identification of a numerical discrepancy within Horizon's Response to the ExA's Questions from the Accompanied Site Inspections, Horizon is submitting an updated document that corrects this error.
- f. *Request for Non-material Change*: Following a request from the ExA during the ISH held on 7 March 2019, Horizon is submitting a request for a non-material change to the DCO application in relation to the design of the junction of the Dalar Hir Park and Ride facility with the A5/A55, which will be in use during the construction phase of the Wylfa Newydd DCO Project. The change is proposed in order to improve junction safety and has the full support of IACC as the local highway authority. No new or different likely significant environmental effects are predicted in relation to the proposed change.

#### **Consideration of a cap on the number of units at the Site Campus**

- 4. During the ISH hearing on Monday 4 March 2019, the ExA requested Horizon to consider and respond to a situation where the ExA felt it would be beneficial to impose an upper limit on the number of units that could be occupied at the Site Campus. The example given was a cap of 500 units. In his oral submissions, Mr Michael Humphries QC on behalf of Horizon raised concerns about the legality of such a condition, stressing that the imposition of such a cap in the Order would in effect be a refusal of the application. Horizon wishes to reiterate the points made by Mr Humphries. Please also refer to Horizon's response to Land & Lakes' Deadline 4 submission [REP5-048] which raised similar considerations.
- 5. The Wylfa Newydd DCO Project has been advanced on the basis that temporary workers accommodation would be provided onsite. To limit the number of workers permitted at the Site Campus to 500, would be to leave 3500 workers without onsite accommodation. These displaced workers would have to look elsewhere for accommodation which, as recognised throughout the Environmental Statement, would

have significant adverse effects within accommodation stocks within the local and surrounding communities. It also threatens the positive effects that would be achieved by providing onsite accommodation which are detailed throughout the Environmental Statement.

6. In reaching its decision to provide for an onsite Site Campus, Horizon has considered all reasonable alternatives. However, as detailed in the Site Selection Report [APP-439], all other proposals were ultimately rejected for a range of reasons. Overall, it was found that locating the temporary workers accommodation on a single site as close as possible to the Power Station Site would minimise impacts upon the local highway network and the amenity/culture of local communities, while reducing the costs of the Wylfa Newydd DCO Project significantly. Further, as reiterated in its response to Land & Lakes' Deadline 4 submission [REP5-048], Horizon does not have in place a commercial arrangement that could otherwise meet this short fall in worker accommodation. Imposing a cap would place Horizon in a ransom situation that would seriously threaten the financial viability of the Wylfa Newydd DCO Project.
7. Imposing such a condition would also be contrary to NPS EN-1 and EN-6 which are unequivocal as to the urgent need for new nuclear power. The Wylfa Newydd DCO Project continues to present the best opportunity for the UK to meet this urgent need, as demonstrated by Horizon in its Statement of Reasons [REP6-008] and reiterated in its responses to the ExA's Further Written Questions [REP5-002]. Imposing such a cap, and in effect refusing the application, would have potentially significant consequences on the UK's ability to achieve energy security including achieving a secure, diverse and reliable supply of electricity while meeting the Government's carbon reduction objectives.
8. Further, as also set out in Horizon's response to Land & Lakes' Deadline 4 submission [REP5-048], imposing such a condition would not meet the requirements for modifying a DCO post-application. This is because:
  - a. such a modification is so fundamental that it would constitute a new scheme;
  - b. the scheme as a whole, with such a modification in place, has not been consulted on; and
  - c. there is no assessment of effects that has considered the modified scheme as a whole. There may be new and different significant effects from the modified scheme, and these have not been assessed or consulted on.
9. For the reasons above, Horizon strongly opposes the imposition of such a condition.

#### **Matters Raised during the Open Floor Hearing on 5 March 2019**

10. Further to the Open Floor Hearings held on 5 March 2019, Horizon will provide a response to the comments made at Deadline 8, following formal publication of any written submissions of oral case. Horizon notes that some of the matters raised by Interested Parties were addressed during the ISHs but it will reiterate its comments at Deadline 8.

#### **Storage and Processing of the Excavated Archaeological finds/remains**

11. Horizon is committed to the storage and processing of the excavated archaeological finds/remains. The storage and processing works would be undertaken in accordance with recognised best practice guidance as set out in within Watkinson & Neal's First Aid for Finds (1998), the Chartered Institute for Archaeologists (CIfA) Standard & Guidance for the

collection, documentation, conservation and research of archaeological materials (ClfA 2014b) and Historic England's Environmental Archaeology (2011).

12. The scope of the works would be to make the archaeological finds/remains and environmental samples physically and chemically stable in advance of future assessment, analysis and publication which will be undertaken prior to DCO implementation as part of the Archaeological Mitigation Strategy which will be secured via a Requirement in the DCO.
13. The storage facility is located approximately 40 minutes' drive from the site office at Wylfa Newydd. The storage facility is part of a larger complex made up of warehouses and commercial business. This facility is intended to be utilised as a location in which to store and maintain physical and archive material from a range of nuclear safety related components and is a purpose-built storage unit designed to hold bulk materials. Racking systems have been installed to hold geological samples, and there is sufficient space within the remaining area to hold all the archaeological artefacts and samples that require storage. The facility has a heating vent system designed to manage the temperatures of the facility and there is out of hours security in place for the complex and control of the keys to access the building is maintained by Horizon Nuclear Power. The paper archive and delicate environmental material which requires refrigeration will be kept at the Wylfa Newydd site office within a stable office environment (the environmental material will be stored in a refrigerator). The archive will be checked on a quarterly basis by a qualified and competent archaeologist appointed by Horizon Nuclear Power, although a weekly inspection of the paper archive and refrigerator will be maintained by a member of the Horizon Nuclear Power suspended state organisation. Isle of Anglesey County Council will be invited to accompany the appointed archaeologist on the quarterly visits to ensure and satisfy themselves the integrity of the archive is maintained throughout storage.
14. Processing of the finds will entail the cleaning, marking and placement in clean bags. Any small finds requiring emergency conservation will be sent to specialists for this work to be undertaken. The environmental samples would be processed using a floatation tank, with the heavy residues collected in a coarse mesh, and the finer material floating into sieves with 250 - 300 micron mesh. These could then be sorted to retrieve the archaeologically relevant material (seeds, charcoal, small mammal bones, hammerscale etc) which would be placed into labelled containers and boxed. Once the finds and the environmental evidence is processed, the material would then be returned to the storage facility until such a time when assessment is undertaken.
15. The Isle of Anglesey County Council will be informed on progress on a monthly basis regarding the processing of the archaeological finds and environmental samples to ensure they are undertaken in a timely manner.

I would be grateful if you could confirm receipt of the Deadline 7 enclosures listed in the Appendix below. If we can be of any assistance in that regard, please do not hesitate to contact us on 0800 954 9516.



**Kieran Somers**

Development Planning Manager Horizon Nuclear Power Wylfa Limited

### Appendix 1 – Matters contained within Horizon's Deadline 7 submission

Document Title	Horizon Reference	Rev
Deadline 7 responses to actions set in Issue Specific Hearings		
Horizon's Deadline 7 Responses to Actions set in Issue Specific Hearings on 4 - 8 March 2019	WN0902-HZDCO-PAC-REP-00296	1.0
Post Oral Hearing Summaries		
Post Oral Hearing Summaries for Monday 4th March	WN0902-HZDCO-PAC-REP-00315	1.0
Post Oral Hearing Summaries for Tuesday 5th March	WN0902-HZDCO-PAC-REP-00316	1.0
Post Oral Hearing Summaries for Wednesday 6th March	WN0902-HZDCO-PAC-REP-00317	1.0
Post Oral Hearing Summaries for Thursday 7th March	WN0902-HZDCO-PAC-REP-00318	1.0
Post Oral Hearing Summaries for Friday 8th March	WN0902-HZDCO-PAC-REP-00319	1.0
General Glossary		
General Glossary	WN0902-HZ-PAC-REP-00003	2.0
Horizon's Responses to ExA's Questions from the February 2019 Accompanied Site Visit		
Horizon's Responses to ExA's Questions from the February 2019 Accompanied Site Visit	WN0902-HZDCO-PAC-REP-00258	2.0
Horizon's Response on the proposed security Articles 83 and 84		
Horizon's Response on the proposed security Articles 83 and 84	WN0902-HZDCO-PAC-REP-00327	1.0
Request for Non-Material Change (RfNMC) no.6 Dalar Hir Park and Ride Junction Improvement		
Request for Non-Material Change (RfNMC) no.6 Dalar Hir Park and Ride Junction Improvement	WN0902-HZDCO-PAC-REP-00331	1.0
Guide to the Application		
Guide to the Application	WN0902-HZCON-PAC-REP-00001_English	8.0
Guide to the Application (Welsh Translation)	WN0902-HZCON-PAC-REP-00001_Welsh	8.0

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