Notice of request for more information

Environmental Permitting (England and Wales) Regulations 2016

Notice requiring further information

To: Mr Neil Burke

Application number: PAN-002429

Natural Resources Wales, in exercise of its powers under paragraph 4 of Part 1 of Schedule 5 of the above Regulations, requires you to provide the information detailed in the attached schedule. The information is required in order to determine your application for a permit, duly made on 20th June 2018. The information requested should be sent to the following address by 14th November 2018.

Information should be sent to:

Wales Permitting Centre
Natural Resources Wales
Cambria House
29 Newport Road
Cardiff
CF24 0TP

Name	Date
Patrick Duffy	17th October 2018

Authorised on behalf of Natural Resources Wales

Ebost/Email patrick.duffy@cyfoethnaturiolcymru.gov.uk
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Schedule

The following information is required;

Appendix G – Stack Height Assessment Report

1. Section 2.3, p9. "EDG A and EDG B have their stacks routed up the sides of the reactor building, the first configuration assumes the stacks are 3m above the reactor building's parapet, which in turn is 7m lower than the reactor building dome." Please provide evidence that this configuration represents a worst-case scenario in terms of building downwash effects.

2. Section 2.4, second bullet point, p10. Scenario B; emissions from three EDGs have different building-association and height, please provide evidence that the combination with the highest prediction was properly assessed.

3. Section 2.9, p18. Please provide more detailed information regarding the 'parameter plan' and provide evidence why, as the submitted report claimed, "it was considered that it was most appropriate to use the nominal lengths and widths for each building."

4. Section 2.9, p18. Please provide evidence supporting the following statements. "Similarly, taller buildings will tend to produce higher ground-level concentrations from elevated sources, so the maximum height was used for buildings which act purely as obstacles. However, for buildings which are associated with sources, the first stack configuration has the stacks 3m above the top of the building, so in these cases the minimum building height was used. This is because having the emission at a lower height will have a greater impact on ground-level concentrations than the building height. This building configuration is therefore judged to be most likely to produce the highest ground-level concentrations, within the bounds of the provided parameter plan". Please also provide evidence that the adopted approach represents a worst-case.

5. Table 2.4, p20. Please state how many building roofs associated with stack emissions are not flat but modelled as flat roofs. Please provide detailed information of building roof features (i.e., dome, slope) and any sensitivity analysis that has been undertaken to consider the impact of these roof features in terms of building downwash effect.

6. Section 2.13, p25. Appendix H used the Jacobs 2017 report; however, Jacobs 2015 was used for this section. Please provide a reason for this.

7. p33-35. In the commissioning scenario the number of hourly exceedances modelled was 182 (which was the same as Appendix H). In the LOOP/LOCA scenario the number of hourly exceedances modelled was 1833, but Appendix H was 1651. Please explain why

different hourly exceedances were predicted for the LOOP/LOCA scenario but not for the commissioning scenario.

Appendix H – Air Dispersion Modelling Report

8. Table 2.2, p10. Please provide the detailed information of the shape and dome features on the roof of 1-101 and 2-101 buildings. Please provide any sensitive analyses undertaken in terms of the selection of roof height (from parapet to apex), selection of main buildings (i.e., 49 m buildings). Please provide evidence that the proposed approach (moving stack away from the wall) would not affect plume-trapping in the building downwash. Also, please provide evidence that the selected scenario (i.e. main building, building height and moving stack) has reflected a worst-case prediction in terms of building downwash effect.

9. Figure 2.1, p17. There are discrepancies between Figure 2.1 – Locations of modelled receptor locations in Appendix G and Appendix H. Please clarify why some receptors are missing from the (north) Wylfa Newydd Development Zone in Appendix H.

10. Appendix A Section 3.1.1, paragraphs 2-4, p8 of 40. Please confirm that there will be no overlap between different testing scenarios.

11. Appendix A, Section 3.1.2, paragraph 2, p9 of 40. Please confirm if there are any exceedances from individual runs of the EDG, BBG and ASG.

Appendix J – Noise Modelling and Assessment Report

12. Source terms. Please explain why there are discrepancies between the noise and air quality modelling regarding source locations and heights.

13. Table 4.6, p17. Please provide further detail as to how Receptor Group G is “linked to development”. Please provide clarification regarding the status of the receptor when assessing the impact.

14. Appendix 2 – Source noise levels used in calculations. Please supply references or further explanation as supporting evidence for the reverberant level within the building, stack and intake source levels.

15. Appendix 2 – Source noise levels used in calculations. The noise modelling input files show EDG stacks located 3m above the EDG building roofs (49m + 3m, total height 52m). This is contradictory to the air quality model where the stacks are located next to the EDG buildings and at a height of 37m. Please clarify and justify that this does not change predicted noise levels.

Shadow HRA – Appendix L

16. Please provide an up to date National Vegetation Classification (NVC) map of the habitats present within the Shingle ridge community interest feature of Cemlyn Bay SAC.

17. Please provide justification for the use of the less precautionary critical load for Nitrogen deposition at Cemlyn Bay SAC of 20KgN/ha/year used in table 7-26 p371 of the Shadow HRA (Appendix L) instead of the 8KgN/ha/year used in Table 26 of Appendix I, p79.

END OF SCHEDULE