

16 August 2020

Dear Rebecca,

Many thanks for your invitation to participate in the NRA Addendum consultation process in the in accordance with the provisions of MGN 543.

As requested, I circulated the questions and your Figure 1 (20UK1647\_Morlais\_NRA\_Layout) among SCC members and also with other sea kayak stakeholders. This response is drawn from this consultation and previous submissions by the sea kayak community to consultations on the NRA.

The zonation of the MDZ as indicated in your Figure 1 should not itself impede passage around the Stacks by kayak. However, as outlined in our previous responses to the TWAO and Marine license consultations we are concerned that (a) changes to the hydrodynamics of the inshore passage may render it unsafe for existing use, (b) floating and emergent structures within the MDZ are a significant hazard and pose a risk to life and (c) exclusion zones during construction may restrict passage.

The risks to kayak navigation largely arise from changes to flow and wave regimes. To assess the cumulative impact of these changes we need to be able to inspect the outputs of the hydrodynamic modelling. As you pointed out Morlais provided us with copies of the revised Wallingford report but the figures are too small to see the detail of interest to us. I have requested higher resolution images from Morlais but these have not yet been provided. Since this is the case our concerns are unchanged from those previously submitted and we can only reassert that the navigation risk for kayaks between the coast and MDZ are likely to be intolerable. For further detail I suggest you examine the SCC and Canoe Wales responses to the TWAO and NRW consultations, the personal consultation responses from sea kayakers and the minutes of our meeting with Morlais on the 10 February 2020.

**1. Changes to your current activities within vicinity of the project;**

Sea kayaks are generally just over 5 m long, up to 0.5 m wide with a draught of less than 0.15 m. As self-powered paddle craft we have limited forward speed – generally navigation planning would work on a 6 km/hr (1.6 m/sec) forward speed. A strong paddler may have a maximum speed of twice this but it can only be sustained for short periods of time. We work at an intimate scale with the water; using eddies for safety and to make progress against the prevailing tide while standing waves on overfalls are used as ‘play’ features to surf against the flow as well as for passage.

The changes indicated in the Wallingford model suggest increases in flow speed of up to 0.8 m/sec and up to 0.5 m to wave heights. This alone would prevent passage by a significant proportion of paddlers. In addition hydrodynamic changes may also compromise safety features such as eddies and access to land such that use as a training and guiding location maybe compromised. Without further detail we would have to conclude that Morlais represents a significant risk and will curtail current activities.

**2. Areas where you consider navigational risks to have changed;**

Navigational risk will be significantly increased in the whole of the area within and landward of the MDZ and perhaps further afield e.g. Carmel Head and the Skerries.

Within the MDZ we consider there will be a significant risk to life from interactions with emergent and floating infrastructure. Once we stop paddling, say for example, to put someone back in their boat after a capsize (a not uncommon occurrence as the area is used for rescue training and practice) we are at the mercy of the tide and will be rapidly swept into the MDZ where we would be very vulnerable to collision and/or entanglement as in a rescue situation we are unable to manoeuvre, will be trailing tow ropes and may have swimmers in the water.

**3. Any additional risk control measures you consider could be introduced to allow operations and navigation to continue safely;**

As we pointed out at the meeting with Morlais, proposed mitigation in the form of grab chains and ladders will actually render the structures more and not less hazardous because of entanglement, the inability of a swimmer to hold on against the tide and likely extreme difficulty of undertaking a rescue close to the floating structure.

Ideally risk control measures would take the form of a safe runout of, say, ten minutes at peak flow 'downstream' of features such as Penrhyn Mawr on the flood and North Stack on the ebb.

**4. Any other observations or general points relevant to shipping and navigation.**

We are concerned about the risks posed to kayaks of sharing the inshore passage with construction and other recreational vessels as at present we encounter few other vessels – at most a handful of low speed small commercial and recreational fishing boats and occasional dive boats.

Yours sincerely,



Jenny Wong

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Cc Canoe Wales