

From: [PMO](#)
To: [Wylfa Newydd](#)
Subject: IACC Deadline 2 Submission : First Written Questions (email 1 of 4)
Date: 04 December 2018 20:12:14
Attachments: [image001.png](#)
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[image003.png](#)
[IACC Response to ExA First Round of Written Questions.pdf](#)
[Written Questions Annex 1.zip](#)

Please note additional Annexes will follow in 3 further emails.

Pnawn Da/ *Good afternoon,*

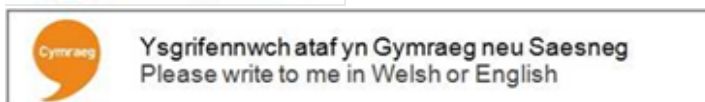
Gweler ynghlwm cynrychiolaeth CSYM mewn perthynas â'r uchod / *Please see IACC's representation in respect of the above.*

Bydd fersiwn Gymraeg yn cael ei ddarparu cyn gynted a phosib / *A Welsh version of the submission will be provided in due course.*

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Mae'r neges e-bost hon a'r ffeiliau a drosglwyddyd ynghlwm gyda hi yn gyfrinachol ac efallai bod breintiau cyfreithiol ynghlwm wrthynt. Yr unig berson sydd 'r hawl i'w darllen, eu copio a'u defnyddio yw'r person y bwriadwyd eu gyrru nhw ato. Petaech wedi derbyn y neges e-bost hon mewn camgymeriad yna, os gwelwch yn dda, rhowch wybod i'r Rheolwr Systemau yn syth gan ddefnyddio'r manylion isod, a pheidiwch datgelu na chopio'r cynnwys i neb arall.

Mae cynnwys y neges e-bost hon yn cynrychioli sylwadau'r gyrrwr yn unig ac nid o angenrheidrwydd yn cynrychioli sylwadau Cyngor Sir Ynys Môn. Mae Cyngor Sir Ynys Môn yn cadw a diogelu ei hawliau i fonitro yr holl negeseuon e-bost trwy ei rwydweithiau mewnol ac allanol.

Croeso i chi ddelio gyda'r Cyngor yn Gymraeg neu'n Saesneg. Cewch yr un safon o

wasanaeth yn y ddwy iaith.

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Reference	Respondent:	Location:	Question:
Q7.0.2	NRW, IACC, GCC, Cadw, NT, VCC, LdCC, LPCC, LbCC and TAG	WF	(a) The approach to the Study Area as described in section 10.2; including the Zones of Theoretical Visibility, the main Assessment Points and the extent of theoretical visibility of the different assessment points within the overarching study area, for the different assessment stages presented in figures D10-18 to D10-27 of 6.4.101 ES Volume D - WNDA Development Figure Booklet - Volume D (Parts 1 and 2) [App-237 and APP-238]; <u>ZTVs</u> – IACC agrees with the selection of the crane types to generate the construction period ZTV as a worst case scenario for the initial construction period ZTV. IACC agrees with the selection of the tallest stacks to generate the operation period ZTV as a worst case scenario for the initial operation period ZTV. IACC agrees with the extents of the ZTV and rationale provided including the support provided by GLVIA3. IACC agrees with the definition of overarching and detail study area and their spatial extent. IACC agrees with the selection of different assessment points in the construction and operation periods as set out in Section 10.2.7 in D10 [APP-129] as shown in Figures D10-18 – D10-27 in WNDA Development Figure Booklet - Volume D (Part 2) [APP-238]. IACC agrees with the selection of components and their heights for the ZTVs provided for the series of construction and operation period ZTVs as shown in Figures D10-18 – D10-27 in WNDA Development Figure Booklet - Volume D (Part 2) [APP-238]. IACC <u>disagrees</u> with the presentation of the ZTVs being restricted to either A3 scale or 4no ZTVs per A3 sheet. These figures form a useful

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Reference	Respondent:	Location:	Question:
			introduction but do not allow IACC to easily gain a detailed understanding of the extent of the ZTVs in relation to specific landscape and visual receptors. This issue can be addressed by the provision of the ZTVs for the detailed study area at A1 scale (including hard copies) on a 1:25,000 Ordnance Survey base. IACC requests that ZTVs are generated to provide linear diagrammatic representations of the visibility of the main components of the construction and operation periods along linear routes. These should be provided for the Wales Coast Path (temporary diversion for the construction period and permanent diversion for the operation period), the Copper Trail/NCR566 (including its permanent diversion) and A5025 within the overarching study area. The linear diagrammatic representations for the construction period should utilise the four component ZTVs provided in Figure D10-19. The linear diagrammatic representations for the operation period should utilise the four component ZTVs provided in Figure D10-24. The provision of these figures will help IACC to gain a more comprehensive understanding on the sequential changes in views of the recreational and transient visual receptors using these routes and the distribution of likely significant adverse visual effects which at present is only available through interpretation of the conclusions of the viewpoint assessments at representative viewpoints located along these routes supported by brief narrative commentary. (b) The summary of the landscape and visual baseline conditions within the study areas including the Value of Landscape Receptors summarised in Table D10-3; IACC broadly agrees with the attribution of landscape value as set out in Table D10-3 and that no landscape receptors possess low or negligible value. However, as noted above, the categories are broad and the

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Reference	Respondent:	Location:	Question:
			categorisation coarse such that no distinction in made between the values of the locally designated and undesignated landscapes. IACC does however request that, as set out in the response to the overarching methodology provided under Q7.0.1, as part of the baseline studies each landscape receptor is subject to a detailed review of landscape value in accordance with GLVIA3. This detailed review would evaluate each landscape receptor's value against the criteria set out in Box 5.1 in GLVIA3. In Wales the adoption of this approach is facilitated by <i>LANDMAP</i> data. The adoption of a detailed review of landscape value would avoid the potential for a deterministic baseline value assessment that is the outcome of the implementation of Table D10-3. For example, IACC does not agree that without more detailed information all SLAs can be automatically ascribed medium value and that all LLCAs outside the LLCA can be automatically ascribed medium value. IACC notes that the boundaries of the four communities are not shown on any baseline figures. IACC recommends that appropriate scale baseline figures are produced that define Tregele and Cemaes as they are used in the visual assessment. These figures should include composite worst case ZTVs, based upon LiDAR data if possible to highlight the screening role of the building in these two settlements. the selected Representative and Illustrative viewpoints for both daytime and night-time described in Section 3 and shown in Figures D10.14 – D10.17 of 6.4.101 ES Volume D - WNDA Development Figure Booklet - Volume D (Part 1 of 2) [APP-237 and APP-238]; IACC agrees with the selection of the viewpoints in the overarching study area as shown in Figure D10-14 but are not in agreement with the viewpoint typology adopted that is set out in Section 10.4.23 of B10

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Reference	Respondent:	Location:	Question:
			[APP-075]. This typology does not fully concur with the viewpoint typology set out in section 6.19 of GLVIA3 and subsumes the GLVIA3 definition of specific viewpoints within representative viewpoints. For example, Illustrative Viewpoint C from Parys Mountain should be categorised as a specific viewpoint under GLVIA3 and as a Representative Viewpoint under the typology presented in Section 10.4.23 of B10 [APP-075]. IACC does not agree that the definition of Illustrative Viewpoints that is provided in Section 10.4.23 of B10 [APP-075] is adequate justification for photomontage to not be produced at these viewpoints: indeed the definition that they are chosen “<i>to demonstrate a particular effect or a specific issue, for example the relationship of the Wylfa Newydd Project to a neighbouring settlement</i>” is strongly indicative of the need to provide photomontage visualisations at some Illustrative Viewpoints. IACC broadly agrees with the selection of the viewpoints in the detailed study area as shown in Figure D10-15. Agreement would be better facilitated if a composite ZTV of the operation period had been included on this figure. This would allow understanding as to why some potential viewpoint locations have been excluded. IACC considers that a representative viewpoint (and therefore a photomontage) should be provided in Llanfairynghornwy. IACC agrees with the selection of the viewpoints close to the WDNA site as shown in Figure D10-16 with the following exceptions: • Representative Viewpoint 16 (Cemaes) should be located on the western end of Maes Cynfor as this is a more elevated location

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Reference	Respondent:	Location:	Question:
			and more representative of the western views available to some residential receptors in properties on this road. • Representative Viewpoint 12 (Cemaes) should be located further to the east along Stad Castellor where more elevated and expansive views are available in which there will be more potential in the operation period for views to be available over tree cover on Mound A to the Main Power Station site. • Representative Viewpoint 13 (Cemaes/Wales Coast Path) should be located on the Wales Coast Path to the immediate north-west of the house shown in the current viewpoint photograph. This is a more elevated and open location and more representative of views available to some residents in the western part of the Penrhyn area in Cemaes. • Illustrative Viewpoint G (Cemaes) should be moved approximately 50m further west to allow a greater number of partial framed views to the WNDA through gaps between houses on Maes Capel. IACC requests the inclusion of the following additional Representative Viewpoints: • The elevated eastern end of Maes Capel in south-western Cemaes. • A second location on the PRoW that skirts the western edge of Cemaes, to be located on the western side of residential properties at the top of Cae Derwydd. • The elevated eastern end of Gwelfor in eastern Cemaes. • Wales Coast Path close to Trwyn y Parc at the entrance to Cemaes Bay. • The seasonal variation of the Wales Coast Path midway along Esgair Gemlyn along Cemlyn Bay.

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Reference	Respondent:	Location:	Question:
			• South-eastern end of Cae Garnedd in Tregale. • Parking bay on road through Llanfairynghornwy between Representative Viewpoint 8 and Illustrative Viewpoint Y to show open eastern views from the principal row of resident properties in this settlement. IACC requests the inclusion of the following additional Night-time Viewpoints: • Revised Representative Viewpoint 13 (Cemaes/Wales Coast Path) to illustrate the current baseline conditions of minimal lighting pertaining to the Site Campus as viewed from the western edge of the Penrhyn area in Cemaes. • A viewpoint in the vicinity of Llanbadrig to illustrate western views across Cemaes Bay that are available to residents in the isolated properties in this area within which the Site Campus has the potential to be a prominent component at night-time. (c) Design basis and activities for construction, operation and decommissioning, including Embedded and Good Practice mitigation; IACC welcomes all the embedded, good practice and additional mitigation measures specified in the Design and Access Statement, Volume 2 (8.2.2), in the Wylfa Newydd Code of Construction Practice (8.6), in the Main Power Station Site sub-CoCP (8.7) and in the LVIA (ES Chapter D10, 6.4.10). As outlined in the IACC WNDA Landscape LIR, IACC also expects various additional mitigation and schemes to be secured by way of DCO requirements and some compensation measures to be secured by way of S106 obligations.

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Reference	Respondent:	Location:	Question:
			As set out in the letter from IACC to Horizon dated 1/10/2018 and in the IACC WNDA Visual LIR, IACC has outstanding landscape and visual concerns about the following aspects of the construction and operation periods at the WNDA site. <u>Construction Period</u> IACC agrees with the list of construction period embedded mitigation measures as specified in section 10.4.22 in Chapter D10 [APP-129] and the good practice mitigation set out in section 10.4.27 in Chapter D10 [APP-129] with the following requirements and recommendations: • The minimal level of information about the formation of Mounds B and E and particularly Mound A in the first two years of the construction period with specific regard to residential visual receptors located in properties in the western edge of Cemaes and Tregele and alongside the A5025. IACC has previously requested and recommend the provision of wirelines superimposed upon winter baseline photography showing how the staged formation of these Mounds from Representative Viewpoints 16 and 18; and Illustrative Viewpoints F and G. • Confirmation that Horizon will agree to minimum as well as maximum height and gradient parameters for Mounds A-E. Minimum parameters are necessary to ensure that Mounds A, B and E can perform their construction period and operation period screening function for residents in Cemaes, Tregele and other residential properties close to the WNDA site. • The treatment of the areas on the WNDA perimeter where the LHMS [APP-424 &425] states Horizon intends to retain and

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Reference	Respondent:	Location:	Question:
			enhance existing field boundaries commencing at the Site Preparation and Clearance. IACC is concerned that the potential for using these perimeters, which in some sections e.g. opposite Tregele, have a width over 100m, has not been fully utilised. IACC notes that the Wales Coast Path temporary diversion will be routed along this perimeter and its treatment will therefore have an impact upon the attractiveness of this important tourism asset throughout the construction period. The undisturbed perimeter also provides important opportunities for the establishment of localised screen planting early in the construction period that could reduce adverse visual effects upon residential and recreational visual receptors later in the construction period and into the operation period. This issue is related to the absence of a comprehensive inventory of field boundaries within the WNDA site as noted in the response to Q7.0.1(d). IACC recommends the submission of drawings showing the field boundaries to be retained and enhanced in the perimeter area; the location and type of new field boundaries; the detailed alignment of the temporary diversion of the Wales Coast Path and associated location of stiles and gates; and seeding and planting types and locations. IACC acknowledges that visualisations of the Site Campus are provided in the Appendix 1-2 of Volume 3 of the Design and Access Statement [APP-409]. IACC recommends that these are supplemented by photomontage visualisations showing the fully operational Site Campus. Photomontages are to be provided from: • Representative Viewpoint 10: Wylfa Head; • Representative Viewpoint 13: Wales Coast Path at Penrhyn; and • Representative Viewpoint 11: Porth Llanbadrig.

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Reference	Respondent:	Location:	Question:
			These three representative viewpoints have been selected as visual receptors at these locations will have open, close and middle distance views that will not benefit from screening subsequent to the formation of Mounds A-E. IACC recommends that all planting is maintained for the full length of the construction period. As set out in the Lighting LIR, IACC is not satisfied with the good practice measure concerning control of light spill to reduce nuisance on communities being undertaken "<i>as far as practicable</i>". Hence, a detailed lighting design is required to be submitted to and approved by IACC. <u>Operation Period</u> With reference to the assumed growth rates provided in Section 10.4.38 of D10 [APP-129], IACC notes that the assumed woodland planting height of 7m at operation year 15 is at the upper end of the spectrum of woodland planting growth height for the detailed study area. The trees in the community woodland planted on the western edge of Cemaes in 2003 have attained heights of between 5-8m in the 15 years since planting. The comments upon the measures associated with lighting set out in the construction period (and the Lighting LIR) continue to apply in the operation period. IACC recommends that the planting maintenance is continued throughout the operation period and is not restricted to five years. IACC acknowledges that the composition of the maintenance plan will need to reflect the decrease in the extent of the maintenance activities after five years.

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Reference	Respondent:	Location:	Question:
			(d) Assessment of effects including: • evaluation of sensitivity of receptors – IACC’s response and recommendations on this issue have been set out in earlier responses to Q7.0.2 and Q7.0.1. • effects on landscape and seascape character - As explained in the IACC WNDA Landscape LIR, the approach in ES Chapter D10 [APP-129] does not separately assess the direct and indirect impacts and “averages” the impacts over each landscape and seascape character unit. It is also vague in terms of the geographical areas within which the impacts would be significant. IACC has undertaken an assessment of impacts on the LLCAs and LSCAs, distinguishing between those parts of these units that are within the Power Station Site, within the remainder of the WNDA and outside the WNDA and this is presented in the IACC WNDA Landscape LIR. Comparing the IACC assessment with the significant impacts predicted in ES Chapter D10 [APP-129] and ES Appendix D10-6, there is a high degree of agreement in terms of those landscape and seascape units that would be significantly affected on and close to the WNDA. The main differences are that ES Appendix D10 does not identify that the impacts within the Power Station Site would be Major adverse (Negative) for the full duration of the project (due to the presence of the power station and the fact that the landscape elements would not be reinstated in this part of the WNDA site). It also does not identify significant effects for the duration of the project on those more distant landscape and seascape units that are elevated and characterised by views, and so will be affected by views of the Wylfa Newydd Power Station for the duration of the project, such as LLCA 8 (Llanfairynghornwy), LLCA 9 (Mynydd y Garn), LLCA 11(Llanfechell) LLCA 13 (North Coast Hinterland), LSCA

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Reference	Respondent:	Location:	Question:
			4 (Wylfa Head), LSCA 6 (Inner Cemaes Bay) and LSCA 11 (Hen Borth). • daytime and night-time effects – The majority of the assessments in ES Chapter D10 are of daytime effects. Assessments of night-time effects have been undertaken for the construction and operational phases and for visual receptors only. Lighting during construction and operation would also have an impact on the special qualities of the AONB and Heritage Coast and the assessments of impacts on these designations do not appear to have taken the impacts of lighting into account. • visual effects IACC agree with the sensitivities adopted for walkers using the WCP; local PRoW network; cyclists on the Copper Trail/NCR566; A5025; and users of the local road network. For local communities IACC agree with the overall evaluation of high sensitivity for residents in Cemaes and Tregele but considers that residents in Llanfairynghornwy and Llanfechell should also be ascribed with high sensitivity as opposed to medium sensitivity. IACC's response to the visual assessment for the construction and operation of the WNDA site has been set out in detail in a series of visual impact assessments (VIAs) and in the WNDA Visual LIR. In summary IACC conclude that the visual assessment is broadly compliant with best practice as specified in GLVIA3 with several shortfalls as set out in earlier responses. The VIA for the WNDA site utilised the viewpoint analysis based approach to visual assessment as utilised in Horizon's visual assessment despite IACC considering that, whilst viewpoint analysis is an important contributory tool

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Reference	Respondent:	Location:	Question:
			to the production of a comprehensive visual assessment, it should not be the primary means of conducting a comprehensive visual assessment for an extensive and complex development with a large number of diverse visual receptors. Allowing for this substantial caveat IACC conclude that the Horizon visual assessment is broadly correct in its attribution of visual receptor sensitivities, magnitudes of change before and after the application of additional mitigation measures and the assessment of significance. IACC does however highlight several shortcomings and omissions in the visual assessment. These are set out in the WND A Visual LIR and in the earlier responses in this document but the most important issues can be summarised as follows: • The omission of any residential receptors in properties located outside of the four main settlements or “communities” in the detailed study area; a proportion of whom will be certain to sustain significant adverse visual effects during construction and operation periods and the associated failure to develop detailed mitigation measures for these visual receptors. Section 6.13 in GLVIA3 states that “<i>The baseline study must therefore identify the people in the area that will be affected by the changes in their views and visual amenity ... they may include people living in the area ...</i>”. GLVIA3 gives no support to an approach that excludes residential visual receptors living outside the main settlements in an LVIA study area when they are within one or more ZTVs and are therefore likely to be visually affected by the construction and/or operation of the proposed development. • The assessment’s refusal at the baseline stage to subdivide large groups of recreational visual receptors on a spatial basis into smaller

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Reference	Respondent:	Location:	Question:
			spatially or functionally coherent groups. Assessment is restricted to the visual effects schedule (Appendix D10-7 [APP-198]) based upon a limited number of representative viewpoints and summary narratives in D10 [APP-129]. • The associated absence of quantifiable baseline information and consequently of quantifiable visual assessments. The assessment does not state the length of the A5025, the Wales Coast Path or the Copper Trail where users will sustain significant visual effects. • The absence of any visualisations outside those in the Volumes 2 and 3 of the DAS [APP-408/409] of the construction period including the Site Campus • The failure to sub-divide the communities of Cemaes, Tregele and Llanfairynghornwy into groups of residential visual receptors based upon characteristics including location; elevation; morphology; aspect; orientation; baseline screening levels; and property age, type and density. This failure is exacerbated by the inadequate selection of representative viewpoints in these three settlements in terms of numbers and location and the absence of any form of visualisations for the early construction period when the magnitude of visual change will be greatest. • The inadequacies of the methodology and application of the Environmental Lighting Impact Assessment (Appendix D10-10 [APP-201] as detailed in the Lighting LIR. (e) Additional mitigation during construction, operation and decommissioning; As noted above, IACC welcomes all the embedded, good practice and additional mitigation measures specified in the Design and Access

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Reference	Respondent:	Location:	Question:
			Statement, Volume 2 (8.2.2), in the Wylfa Newydd Code of Construction Practice (8.6), in the Main Power Station Site sub-CoCP (8.7) and in the LVIA (ES Chapter D10, 6.4.10). As outlined in the IACC WNDA Landscape and Visual LIRs, IACC also expects various additional mitigation and schemes to be secured by way of DCO requirements and some compensation measures to be secured by way of S106 obligations. Some of the additional mitigation measures in Tables D10-40, D10-41 and D10-42 [APP-129] would address shortcomings noted in the baseline in earlier responses, for example the detailed field boundary survey; details about sequencing and construction of mounding; and enhancements to retained boundary features on the perimeter of the WNDA site. (f) Residual effects and Additional Mitigation for construction, operation and decommissioning summarised in Tables D10.43 to D10 for landscape; daytime visual; night-time visual; and (ecological compensation sites) receptors. IACC is in broad agreement with the residual effects and mitigation contained in Tables D10-43, D10-44 and D10-45 [APP-129]. However, as noted above, IACC is of the opinion that there would be significant residual impacts on landscape and/or seascape character during the operational phase within LLCA 8, LLCA 9, LLCA 11, LLCA 13, LSCA 4, LSCA 6 and LSCA 11. The wider geographical extent of significant residual impacts should be taken into account when defining the necessary mitigation and compensation measures within the DCO requirements.

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Reference	Respondent:	Location:	Question:
			IACC also notes that due to the large and spatially extensive nature of the visual receptor groups included, the assessments are too general to allow the effectiveness of the adoption of the additional mitigation measures to be meaningfully evaluated. The corollary of the adoption of these large receptor groups is that it is inevitable that potential and post mitigation magnitudes of change will vary and consequently there will be a mixture of significant and not significant adverse residual effects. These self-evident conclusions are of little benefit in helping IACC to have a detailed understanding of individual visual receptors or small visual receptor groups where detailed design of components on the construction and operation of the WNDA site and/or bespoke mitigation measures could reduce the magnitude of visual change. Notwithstanding the above comment, IACC note that in the construction period Table D10-43 concludes that the adoption of the additional mitigation measures results in no changes to the residual magnitude of visual change for any of the large groups of visual receptors. 1. Is the approach of using representative community views as opposed to individual viewpoints sufficient for assessing daytime and night-time visual effects on community receptors? IACC does not agree that this approach is sufficient. It is not supported by GLVIA3. A meaningful and helpful visual assessment requires that settlements such as Tregele and Llanfairynghornwy, and particularly a large and varied settlement like Cemaes, be subdivided. The subdivision should reflect the variations in the views available to the

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			development site and that are likely to be available of the Proposed Development. Factors to be considered in this subdivision have been listed in a response to Q7.0.2(d). This assessment of day-time and night-time visual effects at a community wide scale results in broad assessment conclusions and supporting narratives. These do not enable IACC to gain a detailed understanding of the distribution of significant and not significant adverse visual effects upon the residential visual receptors in these communities, some of whom are likely to sustain the largest visual magnitudes of changes sustained by any visual receptors. This failure in turn reduces the ability of the design of the WNDA site to fully incorporate measures to minimise potential adverse day-time and night-time visual effects and for the identification and development of proactive off-site Section 106 measures in these communities. This failure has been exacerbated by the inadequate number of representative viewpoints selected in these communities and the consequent minimal number of operation period visualisations provided upon which to make these sweeping assessments. Photomontages have only been produced from two locations within Cemaes (noted that as previously highlighted there are no baseline figures that define the boundary of Cemaes as used in the LVIA). These are Representative Viewpoints 12 and 16 whose precise locations do not show the worst case scenario in these parts of Cemaes. No photomontages have been produced in Tregele and Llanfairynghornwy. A list of additional representative viewpoints from where IACC strongly recommend photomontages be provided in contained in an earlier response to Q7.0.2. IACC wish it to be noted that it has made earlier requests for additional photomontages in Cemaes and Tregele that have not been met.

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