

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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[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,*

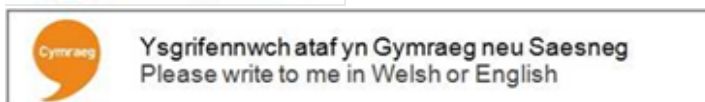
Gweler ynghlwm cynrychiolaeth CSYM mewn perthynas â'r uchod / *Please see IACC's representation in respect of the above.*

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:
Q7.0.1	IACC	Q	Assessment of parameters – review of the relevant section (10.4.3) in [APP-075] confirms that it only relates to an overarching approach of setting parameters “<i>where necessary, for the extent of the development ...</i>” and that these parameters will be defined in the LVIAs for the individual sites. Hence this question is more effectively answered under the later responses for the individual sites whilst noting that Section 10.4.3 does not provide an explicit commitment for the LVIAs to assess the worst case scenario as required under GLVIA3¹ (Sections 4.2 -4.4). Consequently, as noted in various places in the IACC LIR, the worst case scenario is not always assessed. (a) Identification of study areas – review of the relevant sections (10.4.4 – 10.4.9) confirms that the overarching approach to the selection of study areas follows best practice. IACC agrees with the use of ZTVs calculated using LiDAR data but the type and scale of the OS DTM mapping used is not stated. This has the consequence of introducing a degree of uncertainty of to the accuracy of the ZTVs regarding whether specific points or individual receptors being within or outside the ZTV. More specific comments are again provided where relevant under the response for the individual sites. IACC agrees with the use of ‘bare earth’ DTM data as this is in accordance with the LVIA being based upon a worst case scenario. IACC agrees with the need for study areas to be defined using a “<i>proportionate approach</i>” as advocated by GLVIA3 and that consequently they should be defined to allow the LVIAs to focus upon landscape and visual receptors with a greater likelihood of sustaining significant effects. In general, the study areas are

¹ Landscape Institute and Institute of Environmental Management and Assessment. 2013. Guidelines for Landscape and Visual Impact Assessment. Third Edition.

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Reference	Respondent:	Location:	Question:
			sufficient to identify all significant effects on landscape character and landscape designations. (b) Identification of receptors - IACC is <u>not content</u> with the methodology used to select landscape receptors or with the range of visual receptors that is set out in Table B10-13 with regard to the following issues. • Landscape fabric (elements) is identified as a landscape receptor but impacts on this receptor are then not assessed (it is stated that landscape fabric is assessed as part of landscape character but this is not in accordance with EN-1, see IACC LIR). As a consequence, some significant adverse impacts on landscape fabric are not identified or satisfactorily mitigated). • The restriction of the selection of landscape receptors to designations and landscape and seascape character areas that will either sustain direct impacts or indirect impacts via <u>intervisibility</u> only, as measured by ZTVs, could result in some landscape receptors and impacts being inadvertently excluded. Landscape impacts are not restricted to direct impacts or impacts via a visual effects pathway generated by the built components: perceptual attributes such as tranquillity, remoteness and time depth are often important contributory factors to landscape character and special qualities of a designated landscape or seascape i.e. the AONB and Heritage Coast. "<i>Peace and tranquillity</i>" are one of the special qualities of the AONB that are defined in Table 4 of the current AONB Management Plan Review². This description is repeated in Section 10.3.34 in the ES Volume D10 [APP-129]. Impacts upon these perceptual characteristics can result from a variety of indirect impacts that are not dependent upon the source of that impact being visible. Examples might include noise

² The Isle of Anglesey Area of Outstanding Natural Beauty (AONB) Management Plan Review 2015-2020.

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			from activities on site or from increased road or sea traffic or a reduction in dark skies from increased sky glow from upward light escape and ground reflection from on-site lighting. • IACC recommends that these potential effects pathways are explicitly considered both in the identification of landscape receptors and subsequently in the assessment of landscape effects. • The range of visual receptors as set out in Table B10-13 excludes all residential receptors in properties within the construction and operation period ZTVs that are located outside one of four “<i>main local communities</i>” for the WNDA – this will be covered in more depth in the response to Q7.0.2. This approach of excluding visual receptors outside the main communities is also applied for the Logistics Centre, the Dalar Hir Park and Ride and the Off-Site Power Station Facilities. • IACC recommend that the visual assessments for these four development components are supplemented by addenda assessing the visual effects that will be sustained by residential receptors in properties outside the main communities (as per the visual assessments provided for the A5025 Off-Line Works). IACC’s own visual impact assessments whose principal findings are set out in the Visual LIRs compiled for each of the main developments have attempted to undertake visual assessments for these excluded residential visual receptors as far as practical to gain a more comprehensive understanding of the full range of significant adverse visual effects. • The “<i>high level assessment</i>” approach adopted of not further subdividing the visual receptors in the main settlements does not allow the individual visual assessments to provide the granularity of assessment necessary to allow IACC to fully understand the

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Reference	Respondent:	Location:	Question:
			distribution of significant and not significant visual effects upon residential receptors located in these settlements. The use of a severely limited number of assessments at representative viewpoints sited within some of these settlements, whilst useful, is not sufficient to allow IACC to gain a detailed understanding of the variation in visual effects. This shortfall also has the consequence that the design of mitigation measures for the construction periods and the restoration or operation period landscape schemes do not always incorporate potential design details that might mitigate or reduce adverse effects for individual or small groups of residential receptors. • IACC recommend that addenda are produced for the visual impacts assessments that subdivide all the settlements or “main communities” within each development’s study area to allow the required understanding of the variations in the significance of visual effects within these settlements to be readily understood. • The same comments apply to groups of recreational and transient visual receptors included in the visual assessments for the WNDA site, the Logistics Centre, the Dalar Hir Park and Ride and the Off-Site Power Station Facilities. More details are provided in responses to the questions for the individual developments. (c) Identification of baseline conditions – The approach to the identification of baseline conditions as set out is comprehensive with regard to the identification of landscape and visual receptors, apart from the exception discussed below and those noted in the response to Q7.0.1c. There are surveys of woodland, trees and hedgerows, but there is not a comprehensive inventory of the distribution and condition of individual landscape elements within the sites, especially the WNDA site. Given the

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Reference	Respondent:	Location:	Question:
			importance accorded to different types of field boundaries in determining local landscape character, the need for a full understanding of the distribution of field boundaries (including gates, stiles, stone walls and cloddiau) is a key consideration particularly to ensure that the restoration plans accurately replace and ideally increase the amount of baseline landscape elements that will be lost during the site prep and construction phases. This approach is set out in section 5.36 of GLVIA3. Hence, IACC requires a DCO requirement that surveys all landscape elements on the WNDA and AD sites prior to the commencement of the works. (d) Assessment of effects –. Sensitivity of receptors Sections 10.4.30 – 37 and Table B10-14 describe the landscape assessments' approach to the derivation of landscape sensitivity and how it accords with GLVIA3. IACC agrees that the derivation of landscape sensitivity is a key stage in the assessment process. IACC is in broad agreement with the categories and descriptions included in Table B10-14, although these categories are broad and unbalanced. It is unnecessary to have two categories below medium (low and negligible) when undertaking LVIA's in the UK. All UK landscapes are locally valued, so few landscapes can be described as having a low value and it would be difficult to find any landscapes in the UK with negligible value. Consequently, for this assessment only high and medium value are used and this is a very coarse categorisation with the result that the criteria do not distinguish between locally designated and undesignated landscapes. IACC also notes that the methodology does not provide a framework for deriving the value and susceptibility of the landscape and seascape character areas. Appendices such as Appendix D10-3: Local landscape and

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Reference	Respondent:	Location:	Question:
			seascape character study for the WNDA site [APP-194] does include brief summaries of value for each landscape or seascape character area. Each summary is bought through to the table entry for each landscape and seascape character area in the landscape effects schedule appendices such as Appendix D10-6: Landscape effects schedule [APP -197]. Review of the entries for value in the local landscape and seascape character study appendices leads IACC to the conclusion that these are not comprehensive being derived substantially from whether the LCA/SCA is within a designated landscape and the attributed <i>LANDMAP</i> value. Whilst these are relevant considerations, they do not fulfil the full range of factors that can help in the identification of valued landscapes as set out in Box 5.1 of GLVIA3 leading to the potential for landscape value to be incorrectly assessed in the landscape and seascape character appendices and therefore in landscape effects schedules appendices. There appears to be no explanation of how the criteria for landscape susceptibility that are set out in Table B10-14 have been applied to the individual landscape and seascape receptors. Instead susceptibility is simply stated to be high/medium/low/negligible with no explanation provided. This does not accord with GLVIA3's emphasis upon assessment transparency. Review of Table B10-14 also indicates that there is no potential for a landscape receptor to have a variation in landscape value and landscape susceptibility i.e. a high value landscape receptor is intrinsically a landscape receptor with high susceptibility to the change generated by the relevant development of the overall Wylfa Newydd Scheme, although this is contradicted by the supporting text. This approach is unduly deterministic and may lead to inaccuracies in the landscape sensitivities ascribed to landscape receptors in the landscape effects schedules appendices.

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			IACC recommends that the landscape and seascape character areas baselines as presented in appendices are augmented by more comprehensive baseline review of sensitivity using a more detailed review of value and susceptibility based upon application of the approach set out in GLVIA3. Adoption of such an approach would introduce the missing sense of transparency and ensure that the concept of landscape susceptibility (derived from a review of each landscape receptor's physical, visual and perceptual characteristics) was given an appropriate weight. The absence of an inventory of landscape elements within the development sites prevents any baseline review of their sensitivity. This omission has the consequence that the loss of these landscape elements is generally not fully taken into account in the landscape or the visual assessments. IACC recognises that it is unrealistic to request that a full inventory of landscape elements and a review of their sensitivity are undertaken at each site prior to the DCO being determined. Instead it requests that the absence of this important detailed information in the development of mitigation and restoration strategies and the landscape assessments is acknowledged, and that detailed surveys and IACC's suggested additional mitigation and compensation measures are achieved by way of DCO requirements. Similar shortcomings are identified for baseline visual conditions and assessment of impacts on visual receptors. These include the lack of explanation as to how the definitions of values attached to views and the susceptibility of visual receptors to change that are set out in Table B10-15 have been applied to provide the entries in the visual effects schedules. Magnitude of change - Landscape In Section 10.4.39 it is stated that <i>"the size and scale of change in the landscape is mainly a reflection of the extent or proportion of the landscape</i>

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			<i>elements lost or added ...". IACC considers that the absence of detailed inventories of the baseline landscape elements (as noted under the responses to Q7.0.1(c) and (d) above) undermines the ability of the landscape assessment to implement this approach.</i> In Section 10.4.40, it is stated that "<i>geographical extent is assessed by determining the area over which the change would influence landscape</i>". IACC agrees with this approach but, in the assessments of magnitude of change on landscape character areas and designations (eg Appendix D10-6), geographical extents are not expressed in terms of distance, area or even as a proportion of the landscape unit or designation. Instead, the assessment uses vague terms such as "small" which are not defined in the methodology or assessment. Furthermore, these assessments then assess the significance of the effects and residual effects in terms of direct effects (which are generally limited to each site) and effects on the landscape unit or designation "overall". As some of the landscape units and both the AONB and Heritage Coast designations are very extensive areas, the effects on these resources overall are, inevitably, not significant. This means that the extent of the <u>significant indirect effects</u> on these landscape units and designations have not been identified and, consequently, have not been adequately mitigated or compensated. Unlike the methodology for magnitude of change for visual receptors (Section 10.4.43, see below), it is not stated in Sections 10.4.38 – 41 that a worst case scenario is consistently used in the landscape assessment. As identified in the IACC LIR, the parameter approach will lead to a wide variety of possible scenarios, eg in terms of platform and building heights and it is clear that the worst case scenario has not always been assessed with regards to impacts on historic landscape, landscape character and

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			designations (eg on the AONB, Cestyll Garden and Dame Sylvia Crowe's designed landscape). As noted above for the sensitivity criteria, the criteria for magnitude of change are also unbalanced with two criteria below medium (small and negligible) and only one above medium (large). In order to assess the greatest magnitudes of change, for example on the WNDA, and also cumulative impacts, it would be appropriate to have a "very large" magnitude of change category. Magnitude of change - Visual IACC agrees that the use of size and scale and the geographical extent of visual effects to determine the magnitude of visual effects and the listed factors that influence these two criteria are in accordance with GLVIA3. IACC welcomes the statement in Section 10.4.43 that a worst case scenario is consistently used in the visual assessment. IACC notes that there is a disconnect between the approach to determining the magnitude of visual change as set out in Sections 10.4.42 – 45 as summarised in Table B10-17 and the reliance upon the assessment of visual change at representative viewpoints as summarised in the visual effects schedules appendices (Appendix D10-7 [APP-198]). The columns for the magnitude of visual change without and post additional mitigation do contain one word entries for size and scale and geographical extent but there is no further rationale provided in the tables. The descriptions provided in the column titled 'change in view with embedded and good practice mitigation' often do not provide a detailed description that supports the derivation of the assessments for size and scale and geographical extent and hence the magnitude of visual change and, at some representative viewpoints, why the adoption of one or more of a suite of

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			additional mitigation measures is assessed as reducing the magnitude of change. IACC notes that the methodology adopted in B10 is heavily based upon assessment at representative viewpoints which feeds into a broad narrative for the principal groups of visual receptors identified in the baseline which is set out in the main LVIAs. IACC considers that this approach has several weaknesses in allowing a comprehensive understanding of the full range of visual effects: • The visual assessments do not provide IACC with a detailed understanding of the proportions of the PRow networks and open access areas where significant effects are assessed: for example at the WND A site the assessment of effects upon the local PRow network only concludes that across the detailed LVIA study area significant adverse visual effects will be sustained at all 13 representative viewpoints during the construction, operation year 1 and operation year 15 periods. The variations across the extensive PRow network in the WND A LVIA study area are only briefly touched upon in the supporting text in the Volume D LVIA [APP-129]. There is no indication of the total length of PRow network or the number of PRow s (as defined in the definitive map) where significant and not significant effects will be sustained by recreational visual receptors. Similar comments apply to the smaller PRow networks in the LVIA study areas for the Logistics Centre, Dalar Hir Park and Ride and the Off-Site Power Station Facilities. • A similar comment applies at the WND A site for the recreational visual receptors using the Wales Coast Path; Copper Trail/NCR 566 and A5025; and at all the development sites for the local road network.

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Reference	Respondent:	Location:	Question:
			- The reliance on assessments at the representative viewpoints does not allow IACC to develop a detailed understanding of variations in the effects upon residential visual receptors in the nearby communities. Principally Cemaes, Tregle and Llanfairynghornwy for the WND A site; but also at Kingsland and Trearddur for the Logistics Centre; Llanfaethlu for the Off-Site Power Station Facilities and Llanfihangel for the Park and Ride. - Recommendations are provided in response to the questions relating to the individual developments. In summary, although the visual assessments contain large amounts of information and utilise large numbers of viewpoint assessments and a moderate number of photomontage visualisations, the approach of relying almost entirely upon representative viewpoint assessments has substantially weakened the visual assessment. The result is an absence of quantitative assessment of significant adverse effects: IACC knows that the visual assessments conclude that there will be some significant adverse visual effects, for example for residents in Cemaes during the construction period, but it is not clear what the spatial extent of the predicted significant adverse effects will be and approximately how many residents will be affected. These shortcomings apply to a wide range of the main identified visual receptors groups, particularly at the WND A site, but to an extent also at the Logistics Centre, Dalar Hir Park and Ride and the Off-Site Power Station Facilities. In making this comment IACC notes that GLVIA 3 (Section 6.15) states that <i>"Where possible an estimate should also be made of the numbers of the different types of people who might be affected in each case. Where no firm data is available this may simply need to be a relative judgement ..."</i>. IACC considers that the methodology adopted in undertaking the visual

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Reference	Respondent:	Location:	Question:
			assessments at WNDA the Logistics Centre, Dalar Hir Park and Ride and the Off-Site Power Station Facilities has failed to accord with this recommendation. (f) The use of: i. Design Manual for Roads and Bridges assessment methodology for the A5025 Off-line Highway Improvements IACC is highly supportive of the use of the DRMB for the A5025 Off-line Highway Improvements for the landscape and visual assessments. IACC considers that its use avoids many of the shortcomings that have been identified in the landscape and visual assessments at the other development sites. This is due to this methodology's requirement that the baseline identifies landscape fabric and residential and recreational visual receptors at a finer level of detail e.g. small groups of residential properties or individual PRowS, and carries this level of detail through to the landscape and visual assessment. It also encourages the detailed mapping of visual effects for each period assessed. The result is a more detailed, comprehensive and transparent series of landscape and visual assessments for the A5025 sites than has been provided for the other development sites. The only drawback is that the descriptors and definitions for the sensitivity, magnitude, significance and duration criteria are different to those used for the assessments of the other aspects of the Wylfa Newydd Project, which makes it difficult to compare the impacts of the A5025 and the other developments, and also makes it difficult to undertake the assessment of cumulative intra-project impacts based on these assessments. i. Night-time visual effects assessment methodology for the Power Station – IACC agrees that the night-time assessments and ELIA should

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Reference	Respondent:	Location:	Question:
			be based upon the referenced guidance i.e. ILP Professional Lighting Guide 04³. As set out in detail in the Lighting Assessment LIR, IACC considers that the night-time visual effects assessment methodology as applied in the Environmental Lighting Impact Assessment (ELIA - Appendix D10-10 [APP-201]) is flawed. Night-time visual assessment has only been applied in any detail at the WNDA site. At the Logistics Centre, Dalar Hir Park and Ride and the Off-Site Power Station Facilities; a cursory night-time baseline has been provided followed by brief night-time lighting assessments for construction, operation and decommissioning periods based upon assumed working hours and generic lighting designs. The approaches at these development sites do not reflect the methodology set out in ILP Professional Lighting Guide 04. Only a short length of the Valley section of the A5025 Off-line Highway Works will be lit and the limited inclusion of the resultant night-time effects in the baseline context of Valley and the A5 is appropriate. The methodology does not provide a basis for assessing the effects of night-time lighting on landscape resources, such as the effects of 24 hour light on the viability of the boundary vegetation and other vegetation to be retained, the effects on the special qualities of the AONB and Heritage Coast and the effects on the Dark Skies initiative.

³ Institute of Lighting Professionals. 2013. Professional Lighting Guide 04 - Guidance of Undertaking Environmental Lighting Impact Assessments

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Reference	Respondent:	Location:	Question:
			(e) Limitations – Some of the specific limitations on the night-time lighting assessment in the LVIA's and in the ELIA for the WND A site in Appendix D10-10 [APP-201] are acknowledged by IACC but as set out in detail in the Lighting LIR, IACC assesses that the lighting design at the WND A should be sufficiently advanced to overcome some of the limitations and that other stated limitations are the consequence of flawed application of detailed lighting assessment methodologies. IACC disagree with the statement in section 10.4.70 that "<i>There are no limitations to the assessment undertaken within the scope of the methodology set out above</i>" for many of the reasons set out in other responses to this question. In particular IACC wishes to emphasise that the LVIA contains self-imposed limitations by possessing a lack of transparency in the derivation of its assessments; having a visual assessment that is overly reliant on representative viewpoint assessment; does not provide sufficient quantitative assessment on the numbers of residential properties where residents will sustain significant adverse visual effects or the lengths of routes where recreational or transient receptors will sustain significant adverse visual effects; or provide a detailed baseline for landscape elements within the development sites. A major limitation which is not acknowledged by Horizon is the degree of variability in the extent, intensity and duration of the likely significant effects that could arise, as a consequence of the parameter approach.