

From: [PMO](#)
To: [Wylfa Newydd](#)
Subject: RE: IACC Deadline 2 Submission : Local Impact Report - A5025 Offline Highway Improvements (email 30)
Date: 04 December 2018 20:11:48
Attachments: [image001.png](#)
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[image003.png](#)
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Please note, a number of emails will follow in relation to the LIR – we will confirm the final e-mail.

Pnawn Da/ Good afternoon,

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

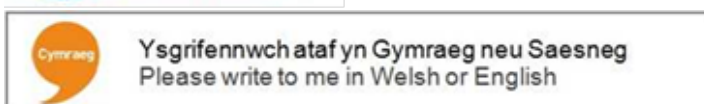
Bydd fersiwn Gymraeg yn cael ei ddarparu cyn gynted a phosib / A Welsh version of the submission will be provided in due course.

Cofion/ Regards,
Manon

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Mae cynnwys y neges e-bost hon yn cynrychioli sylwadau'r gyrrwr yn unig ac nid o angenrheidrwydd yn cynrychioli sylwadau Cyngor Sir Ynys Mon. Mae Cyngor Sir

Ynys Mon yn cadw a diogelu ei hawliau i fonitro yr holl negeseuon e-bost trwy ei rwydweithiau mewnol ac allanol.

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THE ISLE OF

Anglesey

Wylfa Newydd

Local Impact Report

Chapter 22: A5025 Off-line
Highway Improvements

December 2018

PINS Ref: EN010007



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1.0 A5025 Off-line Highway Improvements

1.1 Context

- 1.1.1 The A5025 provides the main access to the northern coast of Anglesey. It also connects the site of Wylfa Newydd to the A55 and wider trunk road network. 16.5km of the A5025 has been identified for improvement running from the proposed Power Station Access Road Junction south to Valley. No works are proposed east of the Wylfa Newydd main site. The length of A5025 identified for improvement has been divided into eight sections, with a further section associated with the proposed Power Station Access Road Junction. Of these, Sections 1, 3, 5 and 7 and the Power Station Access Road Junction are included within the scope of the A5025 Off-line Highway Improvements.
- 1.1.2 The purpose of these works (and the on-line works which are the subject of a issued planning permission from the IACC as local planning authority) are to improve road safety, reduce congestion and to address issues relating to effects on the amenity of residents living along the A5025 corridor. The works are identified by Horizon as being a key mitigation measure in the context of the Wylfa Newydd project and the submitted Phasing Plan (Volume 8.29)¹ indicates that work will commence in the middle of construction year 1 and complete by the end of year 2. The works will be permanent.
- 1.1.3 The A5025 runs in close proximity to (and sometimes along the boundary of) the Anglesey AONB. The importance of the visual experience for residents and visitors travelling along this section of the A5025 is emphasised by the importance that is attached to scenery, the coastline and access to beaches that is reported in the Anglesey Visitor Survey² and the Anglesey Wellbeing Assessment³.
- 1.1.4 The four sections and Access Road Junction are located within and around settlements and consequently their construction and subsequent operation have the potential to be audible and visible to some of the residents. The new off-line highways sections and vehicles travelling upon them will introduce other new visual elements into views e.g. new on-site planting, new field boundaries and, in same locations, embankments, a bridge and acoustic fencing. These all have the potential to individually and cumulatively modify views for residents, change the landscape character of the immediate area and affect species and habitats, including watercourses. The existing public footpath network will also be affected. The proposed works will be seen in the views characterised by deeply rural elements and sometimes long-distance views across the AONB and to the coast and valued landmarks such as Mynydd-y-Garn. Whilst the operation of the A5025 off-line sections will have some beneficial amenity effects due to the removal of traffic from the centre of settlements and the embedded mitigation design, it is crucial that the scope for additional on-site and off-site mitigation measures is fully explored along with suitable compensation measures where significant effects cannot be mitigated.

¹ Examination Library reference APP-[447]

² Anglesey Visitor Survey. 2012. Beaufort Research and the Tourism Company. (Annex 22A)

³ Isle of Anglesey Wellbeing Assessment. 2017. Isle of Anglesey County Council. [\(Link\)](#)

1.2 Impacts and Evidence Base

- 1.2.1 The following sub-sections set out the impacts which have been identified by IACC. Where there is no reference to a topic within this chapter, the Examining Authority can conclude that IACC has considered local impacts to be neutral for the offline highway works.
- 1.2.2 The percentage increase in HGVs using the A5025 to access the Main Site from the A55 at Valley would be significant and would have a detrimental effect on receptors that are sensitive to changes in traffic flow such as schools and villages. Mitigation in the form of bypasses or Off-line highway improvements has been identified to address the impacts on the villages of Llanfachraeth, Llanfaethlu, and Cefn Coch. The removal of project and non-project related traffic from the villages would be a positive impact both for residents and for drivers and their passengers.
- 1.2.3 Positive residential impacts would stem from a reduction in traffic-related noise at certain properties during the operational phase with Horizon identifying 28 properties where occupiers would experience significant beneficial noise effects during the day time and 56 during the night-time period (Table C5-14)⁴.

Ecology

- 1.2.4 The habitats within which the works would occur predominantly comprise improved and semi-improved grassland, walls and hedgerows. Horizon consider there to be little evidence of badger or reptiles which it has scoped from the assessment along with breeding and wintering birds, macroinvertebrate and macrophyte and terrestrial invertebrates. Species considered to be more common in the area include bats, great crested newts, otter, water vole and fish. The Isle of Anglesey Sense of Place report recognises that great crested newt, otter and water vole are rare and protected and that the residents of Anglesey placed great weight on the importance of the natural environment in the Anglesey Well-being Assessment⁵, recognising that a rich diversity of species contributes to improved well-being and quality of life.
- 1.2.5 IACC's review of the ecological assessment contained within the ES and supported by appendices is that there are omissions from the baseline information. The ecological assessment conclusions tend to be generalised and not clearly linked to the underpinning baseline survey data/reports, site design and planned/embedded mitigation.
- 1.2.6 IACC has not identified any significant adverse effects based upon the information provided by Horizon. However, it does note that there is little justification provided to dismiss impacts arising from severance and that the scoping out of effects arising from actions such as lighting, air and water quality are in some instances unjustified. IACC is of the opinion that the basis for the 65dB threshold below which noise effects on ecological receptors are negligible is not well-substantiated in the ecological assessment
- 1.2.7 Whilst Horizon's assessment lacks robustness in certain areas IACC is in general agreement with the conclusions made regarding the level of effects

⁴ Examination Library reference APP-[092]

⁵ Anglesey Well-being Assessment 2017. ([Link](#))

upon ecological receptors subject to the comments provided on particular species below. It concludes that impacts will be generally neutral providing the mitigation set out within the ES and the additional mitigation recommended by IACC below is adopted.

Bats

- 1.2.8 IACC considers that Horizon's assessment of minor positive effects upon bats is unsubstantiated with further information required before IACC can conclude the level of impact. It considers that the assessment of potential effects arising from risk of vehicle collision, habitat loss and severance to be insufficiently assessed and that the conservation value of certain species is under-stated due to an absence of survey data for some of the structures with moderate and high roost potential (e.g. potential tree roosts at Section 7).

Otter and Water Vole

- 1.2.9 There is little in the way of assessment of the potential effects upon otter and no clarity regarding the extent to which otter holts more remote from construction activities might be affected. IACC also questions the 'county' value given to water vole, when in its view a self-sustaining population should be of 'national' value. IACC is uncertain, from the information provided, as to whether water vole habitats/burrows will be avoided and the extent of habitat loss/disturbance/severance. Given this uncertainty IACC would wish to see clarification from NRW that is content with Horizon's proposal to undertake pre-construction surveys and if required, undertake destructive surveys under license. IACC requests that a detailed site-specific method statement be provided and that this should include for the use of buffers/fences to separate water vole habitats from construction activity, reinstatement and reconnection of water vole habitats, supervision of all works in proximity to habitats that support this species, as well as detailed, specific approaches to vegetation clearance, water vole displacement/exclusion and destructive searches. The mitigation should apply to all habitats that will be disturbed and are suitable for water vole and the sub-CoCP⁶ should be amended to reflect this request.

Section 7 Mammals and Badger

- 1.2.10 IACC does not agree with the scoping out from the assessment of badgers. The justification presented within the assessment chapter is unsubstantiated. Similarly, the justification for scoping-out effects on mammal species that are of Principal Importance for biodiversity conservation (e.g. hedgehog, polecat, brown hare, harvest mouse etc.) is not explained. Given the protected nature of badgers, a location-specific scope of any badger mitigation will need to be clarified based on survey data and set out in detail in a Method Statement which should form part of an updated sub-CoCP.

Amphibians

- 1.2.11 Survey data for great crested newt (GCN) is considered to be out of date and the baseline status not clearly characterized. IACC does not agree with Horizon that effects upon GCN will be minor positive and considers it to be neutral.

⁶ Examination Library Referece APP-420

- 1.2.12 Horizon has sought to scope out from assessment common toad, reptiles, bird and invertebrates and habitats without sufficient justification. Furthermore, it has assessed fish as a single receptor when different fish may have differing sensitivities to particularly construction related effects whilst scoping out from assessment potential impacts upon hedgerows based upon Hedgerows Regulations criteria (ecology) may overlook hedgerows that are a habitat of Principal Importance for biodiversity conservation in Wales. IACC requests that a location-specific scope for any reptile mitigation be clarified based on survey data and set out in detail in a Method Statement. It requests that a similar approach is taken to minimise the risk of harming common toads.
- 1.2.13 Measures in the sub-CoCP (Volume 8.12)⁷ to protect Section 7 species should include agreed actions to displace mammals prior to earthworks and/or remove common toads; speed limits to avoid harming wildlife (hedgehog, badger, otter) and measures to avoid creating mammal refugia during construction. The sub-CoCP should also set out measures to avoid eel mortality, including any eels crossing damp grassland; to control waste (operational and construction) to avoid increases in rat populations and to avoid disturbance of any setts that may remain undetected e.g. obscured by dense scrub. The document should also set out the procedures to avoid offences relating to breeding birds which should cover built structures, including stone walls, as well as vegetation. IACC has requested that the relevant DCO requirement relating to the submitted sub-CoCP is amended later in this chapter.

Landscape and Visual

- 1.2.14 IACC has reviewed the landscape and visual assessment of the proposed A5025 off-line highway works prepared by Horizon. The assessment is contained within document G-10 Landscape and Visual Effects⁸, supplemented by Appendices G10.1 to 10.9⁹.
- 1.2.15 IACC agrees that there will be some neutral impacts upon the landscape receptors. These receptors include landscape fabric (trees, hedgerows etc), landscape character and designations. In most cases neutral effects occur later in the project lifecycle, following construction. They occur at a time when the landscaping proposed by Horizon has begun to mature. In the short-term, negative impacts are likely to be significant.
- 1.2.16 Key landscape effects include the impact of the project upon landscape designations. IACC considers that significant short-term impacts upon the AONB will reduce to not significant (neutral) in the medium and long term whilst effects upon the Mynydd Mechell and Surrounds SLA will be neutral in all phases.
- 1.2.17 IACCs conclusions regarding the significance of impacts upon views are informed by the assessments submitted by Horizon and principally Appendix G10-4 – Visual Effects Schedule¹⁰ and Appendix G10-6 – Illustrative

⁷ Examination Library reference APP-[420]

⁸ Examination Library reference APP-[313]

⁹ Examination Library reference APP-[336-344]

¹⁰ Examination Library reference APP-[339]

Viewpoints¹¹. Additional evidence to support IACC's conclusions which are set out below can be found with reference to some of the key characteristics set out for the relevant Local Landscape Character Area: LLCA 4 – Valley farmlands as defined in Appendix G10-1¹²

- 1.2.18 Horizon's assessment has identified neutral impacts (slight adverse residual effects) consisting of individual properties or property groups, communities and users of the national footpaths and cycleways (PR1 Wales Coast Path and PR2 National Cycle Network (NCN) route 5, PR3 NCN route 8, PR4 NCN route 566/Copper Trail, 5) and local public rights of way. Neutral (neutral or slight adverse) effects have also been identified to users of the local road network such as T5 Local road: Llanfaethlu to Llanfwrog and T6 Local road: within Isle of Anglesey AONB south-west of Llanfaethlu.
- 1.2.19 IACC agrees with most but not all of the neutral effects identified by Horizon. IACC considers that there would be residual significant adverse effects (negative impacts) during construction upon the landscape fabric which would be directly affected by the construction of the off-line highway improvements. Existing field patterns, trees, field boundaries and important hedgerows would be lost resulting in impacts that would be adverse and permanent. In the medium term there would also be a level of impact upon similar receptors which are located adjacent to the works. Field patterns would be disrupted for example.
- 1.2.20 The loss of features in the landscape would also represent a negative impact upon landscape character given that many of the features, such as hedgerow trees, stone walls, and earth banks contribute to the distinctive landscape of the area. The presence of the new highway would also alter the character of the immediate landscape surrounding the route albeit that this effect would reduce over time as replacement planting matures. IACC does consider that additional hard and soft landscape should however be provided and further information is provided later within this chapter.
- 1.2.21 The construction and operation of the road will not direct effect nearby landscape designations (the Anglesey AONB) given that it lies outside the boundary. However, there will be negative impacts in the short-term due to the actions associated with the construction of the project and the loss of field patterns, trees, field boundaries and important hedgerows in sections 3 and 5. Whilst outside of the AONB, these losses would take place within views from the AONB.
- 1.2.22 IACC's consideration of the visual effects arising from the project is presented for each individual off-line section.

Section 1 Valley

- 1.2.23 IACC concurs with Horizon's assessment that there would be residual significant adverse effects (negative impacts) during construction at:

a) R4: two properties on eastern edge of Valley;

¹¹ Examination Library reference APP-[341]

¹² Examination Library reference APP-[336]

- b) C1: publicly accessible community areas in Valley;
- c) PR6: two PRoWs to north of Section 1;
- d) T13 & T14: closest sections of A5 and A5025.
- e) Z1: Valley Cemetery.

1.2.24 Two of the receptor groups referenced above would also experience negative impacts at Year 1 of operation. They are receptor groups R4 and Z1. No negative impacts would be experienced at Year 15 of operation.

1.2.25 IACC agrees with the assessment presented by Horizon but is of the opinion that the negative impacts could be substantially reduced by additional mitigations over and above those proposed by Horizon. For the small number of visual receptors assessed as sustaining impacts during the construction period, IACC would ask that emphasis be placed on the application of two of the additional mitigation measures for the construction period set out in Horizon's Table G10-9¹³. These are the reduction of light spill from lighting units in the construction compound and the design of the appearance of the construction compound. One exception to the mitigations proposed by Horizon would be the two PRoWs (Definitive Map References 49/016/1 & 2 and 49/009/1) where compensation measures involving footpath and signage improvements would be appropriate.

1.2.26 During the operational phase there are two visual receptor groups where IACC believes that consideration should be given to reinforcing existing off-site planting. At R4¹⁴ IACC concludes additional planting along the property boundary could provide additional screening recognising that it would need to be undertaken in consultation with the residents at the two properties (and the landowner if planting were to be outside the properties' curtilages). At Valley Cemetery, existing boundary planting within the Cemetery is not as extensive and there may be greater scope for additional planting within and alongside the western boundary.

Section 3 Llanfachraeth

1.2.27 Horizon has identified thirteen residential receptor groups, two public recreation routes and three local roads where occupiers or user would sustain negative impacts during construction. Approximately half of these visual receptors are assessed as sustaining large or very large impacts. IACC agrees with the assessments of significance.

1.2.28 At Operation Year 1 all the visual receptors listed above are assessed as sustaining moderate magnitudes of impact although the resulting significance of residual effects varies between moderate and large. Effects upon these receptors reduce to moderate (but still significant) at Year 15. IACC agrees with the assessments of significance for many receptors identified but is of the opinion that effects are under-represented at R27 Properties on Parc Llynnon,

¹³ Examination Library reference APP-[344]

¹⁴ As shown on [Table G10-4.1], Examination Library reference APP-[339]

R30 Bedo Farm, R31 Four properties east of Llanfachraeth and R40 Pen-y-Groes¹⁵.

1.2.29 At Operation Year 15 IACC agrees with Horizon's conclusions of significance, except for receptors R27 – Properties on Parc llynnon, R30 – Bedo Farm, R40 Pen-y-Groes, PR8 – PRoW south-east from southern end of Section 3, PR9 – PRoW along Afon Alaw, PR13 – PRoW south of Plas Ellen & Tan y Bryn and PR14 – PRoW south of Donwy.

1.2.30 IACC considers that existing off-site planting should be reinforced to further mitigate local impacts. This planting would be concentrated upon existing field boundaries formed by hedgerows and/or post and wire fences as opposed to field boundaries formed by cloddiau or stone walls. IACC considers that there may also be limited scope for the introduction of carefully sited field corner planting or shelterbelts. This type of planting would be more appropriate to key landscape characteristics present in parts of the overarching study area sited in LLCA7, LLCA9 and LLCA10¹⁶.

1.2.31 Examples of measures to be taken to further screen section 3 would be small scale tree planting to block up narrow gaps and this could be crucial in providing increased screening and/or filtering of views to a section of the noise barrier or the viaduct and its embankments for residents in individual or small groups of properties in eastern Llanfachraeth. Furthermore, field boundary planting should be sought in this area, potentially as compensation for any adverse effects upon the closest part of the AONB. IACC notes that a comparison of aerial photographs from 2010 and 2017¹⁷ shows that a previously well-treed field boundary running north-south from Minffordd to Lon y Felin lost all its tree resource after 2010. The replacement of the lost vegetation would be beneficial in landscape and visual terms screening views of Llanfachraeth for receptors in the nearest parts of AONB. The reinforcement of hedgerow to north of western end of PR8¹⁸ would provide some additional screening for residents at R23 Tyn Fynnon¹⁹, whilst selective planting on the southern side of the western end of T1 ²⁰would also provide some additional screening for residents at R33²¹ and users of the permanently re-routed PR13²².

Section 5 Llanfaethlu

1.2.32 Thirteen residential receptor groups, one community (Llanfaethlu), two public recreation routes and one local road have been identified by Horizon where occupiers or users would sustain negative impacts during construction. This reduces at the Operational Year 1 and Years 15 assessment periods such that Horizon identifies one significant adverse visual effect at R56 Rhos-ty-mawr ²³at Year 15. IACC is in general agreement with the assessment conclusions

¹⁵ As shown on [Table G10-4.1], Examination Library reference APP-[339]

¹⁶ Examination Library reference APP-[194]

¹⁷ Google Earth Pro

¹⁸ As shown on [Table G10-4.1], Examination Library reference APP-[339]

¹⁹ As shown on [Table G10-4.1], Examination Library reference APP-[339]

²⁰ As shown on [Table G10-4.1], Examination Library reference APP-[339]

²¹ As shown on [Table G10-4.1], Examination Library reference APP-[339]

²² As shown on [Table G10-4.1], Examination Library reference APP-[339]

²³ As shown on [Table G10-4.1], Examination Library reference APP-[339]

and whilst it has identified some receptors where it considers that the magnitude of change could be higher than that identified by Horizon it does conclude that the residual levels of significance which have been recorded are accurate.

- 1.2.33 To further mitigate the local impacts recorded IACC would wish to see additional on-site shrub and intermittent tree planting close to the junction of section 5 with the former A5025²⁴. In this location a north-western extension of proposed native shrubs with intermittent trees planting type or a small number of individual trees on the western side of Section 5 would provide additional filtering of views of the junction and the slightly elevated section to its east for the residents of Rhos-ty-mawr (R56)²⁵.
- 1.2.34 IACC has also identified opportunities for off-site planting which would provide additional screening through the reinforcement of existing field boundaries. This would take at the western end of the Llanfaethlu – Llandeusant road (T4)²⁶ and in the area between PR18 and Cae'r Bryniau (R53)²⁷ and the northern section of Section 5.

Section 7 Cefn Coch and Power Station Access Road Junction

- 1.2.35 Horizon's assessment has concluded that there would be negative impacts during construction at seventeen individual or groups of residential receptors, five PRoWs, one community receptor (public areas in Tregale) and four local roads. This reduces to two properties and one road in Year 1 Operation and one residential receptor (R76 Tyn felin) at Year 15. The additional mitigation measures identified by Horizon do not reduce the levels of significance recorded.
- 1.2.36 IACC's review of Horizon's assessment identifies slight differences between the conclusions reached with regard to Construction effects. With regard to year 1 Construction effects IACC is of the opinion that the conclusions of no significance reached for receptors R79 (Pen yr Groes), R80 (The White House), R87 (Rhandir) and PR23 (PRoW close to White House)²⁸ potentially underplay the significance of effect resulting from the operation of Section 7 such that effects would be moderate and therefore significant as opposed to slight. As such significant negative impacts would occur.
- 1.2.37 For the same receptors, IACC has identified additional negative impacts over and above those recorded by Horizon at Year 15 Operation.
- 1.2.38 There is minimal scope for the impacts identified by IACC to be reduced by additional on-site mitigation planting. This is because apart from R79²⁹ the receptors are very close to Section 7 of the A5025 and the low level of existing screening cover available. In nearly all locations, the narrowness of the section

²⁴ As shown on [Table G10-4.1], Examination Library reference APP-[339]

²⁵ As shown on [Table G10-4.1], Examination Library reference APP-[339]

²⁶ As shown on [Table G10-4.1], Examination Library reference APP-[339]

²⁷ As shown on [Table G10-4.1], Examination Library reference APP-[339]

²⁸ As shown on [Table G10-4.1], Examination Library reference APP-[339]

²⁹ As shown on [Table G10-4.1], Examination Library reference APP-[339]

7 on-site corridor limits the scope for additional on-site planting, with one exception along the eastern boundary.

1.2.39 To provide appropriate mitigation therefore IACC would wish to see off-site planting in locations such that they would reduce otherwise significant adverse effects at R79 and R97³⁰ to not significant. Planting should take place within the two remnant fields that would be formed between the former A5025 and the eastern boundary of the corridor of section 7.

1.2.40 Additionally, targeted planting could be provided in a number of locations where adverse although not significant effects have been identified. Such planting would be in the form of reinforcing and strengthening the screening and filtering role of existing boundary hedgerows or belts of trees.

Compensation and Enhancement

1.2.41 Throughout the area crossed by the off-line sections there are several public footpaths which Horizon has recorded as being difficult to access or inaccessible. This is particularly the case within section 3 and 7 and the study area around the Power Station Access Road. The situation could be remedied through improvements to the management, access facilities (stiles, gates) and signage enhancements even where the small number of PRoWs in the Section 5 study area appear to be easily accessible. There would be scope for improvements in tandem with IACC's wider recreation and access strategies as set out in the ROWIP 2008-2018³¹ and the replacement ROWIP once approved. Compensation measures could also extend to the maintenance and enhancement of field boundaries including cloddiau. At section 7 for example, the key characteristics of LLCA21³² emphasise the disrepair of hedgerow and dry stone wall/cloddiau field boundaries and their consequent reinforcement or replacement by post and wire fencing.

1.2.42 The key characteristics of LLCA12 and LLCA11³³ emphasise the importance of retaining the field boundary pattern and evidence of a lack of current maintenance.

Surface and Groundwater

1.2.43 IACC has assessed the relevant chapter and supporting appendices, including the Flood Consequence Assessment³⁴ and concludes that for most of the identified receptors which could be impacted, suitable mitigations are identified, and the potential magnitude of change is agreed. Horizon has identified multiple minor adverse surface water and groundwater effects which would be less than significant. 39 such effects assessed are detailed in Appendix I3-1 (Master Residual Effects)³⁵. IACC agrees with these conclusions and for the purposes of this report these effects are considered to be neutral impacts.

³⁰ As shown on [Table G10-4.1], Examination Library reference APP-[339]

³¹ Isle of Anglesey, Rights of Way Improvement Plan 2008-2018 ([Link](#))

³² Examination Library reference APP-[194]

³³ Examination Library reference APP-[194]

³⁴ Examination Library reference APP-323

³⁵ Examination Library reference APP-[391]

- 1.2.44 IACC has significant concerns regarding potential flood risk impacts at the unnamed residential property at section 3 (Afon Alaw viaduct)³⁶. The assessment concludes that detailed design will be able to prevent the predicted minor increase in flood risk but IACC would wish to understand the fall-back position should such design prove physically/financially infeasible.
- 1.2.45 Further detail is also required in respect of potential impacts upon private water supplies (PWS). IACC has concerns that the assessment as presented includes for assumptions which are inconsistent and lacking in detail. No site visits appear to have been undertaken with few if any attempts to gather additional information. Chapter G8³⁷ notes that the ground investigation identified discontinuous thin aquifer horizons with low storage and this therefore means that Private Water Supplies (PWS) are potentially vulnerable to local changes which may affect their catchment. A better understanding of PWS/well use, construction, abstraction quantity and purpose should be provided rather than reliance on monitoring of one PWS at Erw Goch.
- 1.2.46 Horizon notes that there is a natural bedrock cascade within the Afon Cafnan, immediately downstream of the small road crossing to Pen-yr-orsedd. It considers the cascade to be of high sensitivity providing geomorphological diversity within the catchment and a unique feature within the watercourse. A section of the cascade is proposed for removal with the replacement taking the form of a concrete culvert. Horizon also notes that the section of the cascade not needed for removal may be damaged during culvert construction. Reference is made to the adoption of buffer zones and risk assessment within the main Wylfa Newydd CoCP although the measures in that document appear to be more associated with the prevention of spills and accidents as opposed to the protection of the feature (Application document 8.6, section 10.2)³⁸.
- 1.2.47 IACC requires further information about the bedrock cascade as the suitability of the mitigation is unclear. Horizon needs to give consideration as to whether the feature is likely to be entirely removed (lost), or whether the extent of works can be adjusted to leave as much as possible of the feature intact. IACC requires more information to demonstrate whether recreation/mitigation is possible.

Historic Environment

- 1.2.48 Horizon's assessments and conclusions in relation to effects upon historic assets and their settings are considered appropriate although the conclusions presented do not explicitly consider potential beneficial effects on historic buildings within the villages which are to be bypassed. Most notably at Llanfachraeth, there are a number of listed buildings which front directly onto the present line of the A5025 and where the removal of through traffic could reinforce the historic character of the village, thereby enhancing the contribution of the setting of these heritage assets to their significance. In the opinion of IACC this would be a lasting Neutral or slight Positive impact.

³⁶ Examination Library reference APP-[323]

³⁷ Examination Library reference APP-[311]

³⁸ Examination Library reference APP-[414]

- 1.2.49 A potential moderate adverse effect (negative impact) on the significance of the Capel Soar Standing Stone at Llanfaechlu because of construction activities and the realignment of the road has been identified. This conclusion appears appropriate to IACC which considers that any harm would be of a limited magnitude. The stone is easily visible from the current A5025 and Horizon should identify potential compensation measures which could include an information board or similar at an appropriate location.
- 1.2.50 Horizon's ES also identifies negative impacts arising through change to setting of Grade II listed buildings at Siop Soar (Asset 149, LB 28414) and the Black Lion Inn (Asset 150, LB 24794) and the non-designated Rhos-ty-Mawr (Asset 173) at Llanfaechlu. These effects would constitute moderate harm to significance for a limited period, a temporary and short-lived negative impact.

Socio economic

- 1.2.51 IACC notes that the assessment identifies that a large land-take of around 132ha of Grade 4 agricultural land is required to carry out the A5025 off-line improvements and that four agricultural land interests would be directly affected requiring Horizon to purchase/compulsory purchase the land to complete the works. A reduction in usable agricultural land would lead to an economic impact upon the business affected.
- 1.2.52 IACC recognises that there would be some economic benefits generated by this element of the project through job creation during the highway improvements and positive impacts on local supply chains potentially using local contractors and businesses. Although the negative impact on local businesses is likely to be minimal, there are six businesses located within 1km of the proposed sites and there may be some minor impacts on terms of access disruption. Amendments to the sub-CoCP to provide a commitment to signage that local businesses remain open should be made.

Other Matters

- 1.2.53 The proposed off-line highways works are intended to mitigate the effects arising from construction traffic upon the communities which live along the existing road network. As such it will be critical that the works are implemented in accordance with Horizon's submitted Phasing Strategy³⁹ which indicates delivery by the end of year 2. IACC requests that Horizon confirm the contingencies it would implement should completion be delayed.
- 1.2.54 The Wylfa Newydd SPG identifies a number of opportunities potentially arising from development within the A5025 corridor. These include that consideration is given to providing new or upgraded utilities and infrastructure whilst improvements are made to the A5025⁴⁰. IACC requires that the project promoter work with utility providers to ensure that any upgrades are where possible, incorporated into the design and implementation of the A5025 improvements and that resilience and future proofing should also be considered (e.g. insertion of ducting) to prevent future impacts on the highway network and to provide a lasting legacy.

³⁹ Examination Library reference APP-[447]

⁴⁰ Wylfa Newydd SPG 2018, page 168 ([Link](#))

1.2.55 The IACC are satisfied in principle with the design which has been developed through the Highways Collaboration Agreement between Horizon and IACC Major Projects Team. The design principles have been accepted and the A5025 Off-line Departures from Standard report has been approved by the Highways Department's Interim Head of Service. The IACC has however a number of concerns with and objections to the details submitted. The IACC notes at this time that it has objections to some of the detail of these proposals and these will be submitted to the Examining Authority in due course. In reviewing these plans, the IACC has also noted a number of points on which improvements could be made to the detailed proposals, including for example altering the layout of shared path provision to halve the number of carriageway crossing points required for pedestrians and moving crossing to points to locations where speed limits below the national speed limit would apply improving safety. Opportunities for improvements of this sort will be also be noted in the IACC's submissions on the detail.

1.3 Policy Position

- 1.3.1 Policy PS 9 of the Joint Local Development Plan provides the overarching framework in relation to the proposed Wylfa Newydd project including development associated with the project. Criterion 1 of Policy PS 1 provides a link with it and other Policies in the Plan that may be relevant, as well as SPGs. It expects that the development of the nuclear power station and proposals for related development are shaped by these additional Policies and SPG.
- 1.3.2 Criterion 3 of Policy PS 9 is also of particular relevance in that it expects highways and transport proposals to form part of the integrated traffic and transport strategy that has regard to Policy PS 4 and any relevant detailed policies, minimising adverse transport impacts to an acceptable level.
- 1.3.3 On the basis that there are likely to be unforeseen impacts, the requirements of criterion 16 of Policy PS 9, which sets out the Council's expectation that a robust review mechanism be developed to monitor a full range of impacts, to review the adequacy of mitigation and compensation measures and make adjustments as necessary.
- 1.3.4 Additionally, based on the issues raised in this Chapter criterion 13 is of particular relevance in that it sets out the Council's expectation that the developer will set up appropriate packages of community benefits.
- 1.3.5 Moving on to detailed Policies, it is noted that Section 4 of Policy TRA 1 of the Joint Local Development Plan (JLDP) identifies improvements to the strategic transport network through safeguarding known strategic schemes identified on the proposals maps. Criterion (iii.) of Section 4 of the policy refers to improvements on the A5025 Valley to Wylfa in association with the Wylfa Newydd project as a strategic scheme required to deliver a national significant infrastructure project.
- 1.3.6 Paragraphs 6.1.45 and 6.1.46 of the Explanation to Policy TRA 1 in the JLDP highlight the current limitations along parts of the A5025 and identifies four main locations which require significant improvements. These locations correspond to Horizon's sections 1, 3, 5 and 7 for off-site highway works. These locations/sections are shown as safeguarded areas within the JLDP Proposals

Map/relevant inset plans. IACC notes that the Power Station Access Road Junction is not shown as safeguarded within the JLDP as it did not form part of the strategic scheme identified during the earlier pre-application process.

- 1.3.7 The Wylfa Newydd SPG establishes a number of over-arching, Key Development Principles (GP 27) appropriate to all Wylfa Newydd related development proposals within the area in which a greater part of the proposed A5025 works would take place. These principles focus upon the need to ensure that the consequence of the project upon the communities and environment of North Anglesey are minimised and that where otherwise significant effects remain, that these are mitigated. The SPG also establishes the concept of compensation and recognises that given the scale, complexity and duration of the Wylfa Newydd Project, that there will be instances where impacts are such that they are unquantifiable or unforeseeable.
- 1.3.8 The SPG therefore calls for the establishment of a Community Resilience Fund (CRF) from the project promoter within the planning mitigation. This fund should be ring fenced with an appropriate part for North Anglesey and should seek to support measures to enhance North Anglesey as a place to live, work and visit.
- 1.3.9 The following paragraphs set out IACC's view with regard to the topic specific policies of the JLDP.

Ecology

- 1.3.10 The policies that are relevant to mitigation include Section 6 of the Environment (Wales) Act 2016. IACC is of the opinion that this national legislation and policy, supported by local policy below justifies the additional mitigation requested above.
- 1.3.11 Criterion 8 of the JLDP's Policy PS 9 expects that a scheme's layout and design, ... planting (including hedging and tree belts), etc should avoid, minimize, mitigate or compensate for a range of impacts, including ecological impacts in the short and longer term.
- 1.3.12 JLDP Strategic Policy PS 5 states that all proposals should '*protect and improve the quality of the natural environment, its landscapes and biodiversity assets*',
- 1.3.13 JLDP Strategic Policy PS 19 provides the overarching framework in relation to conserving and where appropriate enhancing the natural environment. Of particular relevance are criteria 4 and 8, which state that biodiversity should be protected and enhanced and that natural habitats should be enhanced and/ or restored, and that when determining a planning application, there is a need to '*Protect, retain or enhance trees, hedgerows or woodland of visual, ecological, historic cultural or amenity value*'. JLDP Policy AMG 5 Addressing Local Biodiversity Conservation builds on Policy PS 19 and states that proposals must '*protect and, where appropriate, enhance biodiversity...considering opportunities to create, improve and manage wildlife habitats and natural landscape including wildlife corridors...trees, hedges*' etc.
- 1.3.14 Wylfa Newydd SPG GP21 Conserving and Enhancing the Natural Environment states that '*where adverse impacts cannot be avoided, appropriate mitigation and/or compensation measures will require to be implemented*'.

- 1.3.15 Wylfa Newydd SPG GP31 A5025 Corridor identifies the natural environment as a key issue and states that proposal either alone or in combination with other development proposals should not have significant adverse effects on ecological assets within and close to the Area of Search.
- 1.3.16 With regard to the local policy referenced IACC considers that they provide sufficient justification to require Horizon to provide additional detail and information to justify the scope of the assessment undertaken and that additional mitigation measures be presented to and agreed by both IACC and Horizon. The measures are required in order to provide adequate protection of existing ecological receptors such as Section 7 mammals and amphibians.

Landscape and Visual

- 1.3.17 Strategic Policy PS 9: Wylfa Newydd and Related Development states under criterion 8 that “*The scheme layout ... landscaping, planting (including hedging and tree belts), ... should avoid, minimise, mitigate or compensate for visual landscape and ecological impacts on the local and wider area.*” Criterion 13 states that “*The burden and disturbance borne by the community ... should be recognised; and appropriate packages of community benefits provided by the developer will be sought to offset and compensate the community ...*”. Both these criteria support the need for the provision of mitigation and compensation, the latter in the form of off-site landscaping and screen planting, where its provision will potentially reduce adverse visual impacts sustained by residents.
- 1.3.18 Strategic Policy PS 9, criterion 16 states that as the project develops there may be unforeseen circumstances resulting from the construction and operation periods that require additional works to be carried out by the developer to offset any additional impacts borne by the community affected i.e. Valley, Llanfaethlu, Tregele. This could be relevant should the proposed on-site landscape works not provide their assumed filtering and screening role effectively, nor relate the highway works satisfactorily in to the surrounding landscape character. IACC considers it necessary for the developer to monitor impacts and review the adequacy of the mitigation measures and to make adjustments as necessary. Such adjustments may include provision of additional on- and off-site planting.
- 1.3.19 Any localised planting within or close to the communities will need to accord with many of the criteria in Policy PCYFF 4: Design and Landscaping. The supporting explanation notes that a well-designed and executed landscape scheme can become “*an ongoing asset to the community*” and that the overall aim is to “*achieve an environment that maximises the quality of life for people who live and work in the Plan area*”.
- 1.3.20 The Wylfa Newydd SPG provides policy guidance with regard to the A5025 off-line highway improvements.
- 1.3.21 The provision of mitigation and compensation proposals regarding impacts upon the landscape and visual amenity accords with SPG Objective 3, especially the need to ensure that measures are implemented to mitigate and/or compensate for significant negative effects of proposals and support local communities where these effects may occur; and ensuring compensation is secured for residual adverse effects that cannot be mitigated.

- 1.3.22 Mitigation and compensation proposals would also accord with Objective 4, especially ensuring that measures are implemented to minimise visual amenity impacts through appropriate mitigation and providing compensation and for Objective 7 which seeks to enhance the Island's distinctive landscape and providing as compensation for residual adverse visual effects that cannot be mitigated.
- 1.3.23 An additional GPs considered to be of relevance is GP 7: Health which states that mitigation measures relating to health should include the physical design of the new development including consideration of screening to minimise impacts on sensitive receptors i.e. residents in the overarching study area; and monitoring the potential impacts including in respect of light pollution.
- 1.3.24 SPG GP 21: Conserving and Enhancing the Natural Environment establishes IACC's expectation that Horizon explores opportunities to enhance the Island's natural environment and ecosystem services including through the adoption of high quality design principles (sub-principle xv) and landscaping schemes (sub-principle xix) whilst GP24: Planning Obligations states that compensation and mitigation should relate, directly or indirectly, actual or perceived to the impacts of the Wylfa Newydd Project, including adverse impacts on the health and well-being of communities.
- 1.3.25 SPG GP 31 A5025 Corridor states that careful consideration should be given to the location, scale and design of development in order to conserve and enhance the Anglesey AONB and that the materials to be used on road improvement projects (for walls, footpaths etc) should reflect local character with vegetation and habitat loss minimised and where lost replaced.

Surface and Groundwater

- 1.3.26 JLDP Strategic Policy PS 5 Sustainable Development, criteria 6, 7 and 8 seek the protection and improvement of the natural environment, the need to avoid pollution from new development and to reduce the effect arising from development upon water resources and quality as well as the need to manage flood risk and to maximise the use of sustainable drainage schemes.
- 1.3.27 The Wylfa Newydd SPG at GP20 Adapting to Climate Change requires the implementation of appropriate measures for inclusion for the effects of climate change such as the provision of compensatory flood storage and uses of SuDS. It also requires flood warning and evacuation plans.
- 1.3.28 Wylfa Newydd SPG GP22 Conserving the Water Environment requires the project promoter to demonstrate that the project would not have an adverse effect on water quality, riparian habitats and aquatic features and that where the potential for adverse effects is identified, appropriate mitigation measures are implemented. Furthermore, the Guiding Principle calls for the control of surface water run-off also through sustainable drainage schemes.
- 1.3.29 SPG GP 31 A5025 Corridor identifies opportunities to be taken in respect of the corridor which include for the improvement of watercourse water quality and to better attenuate road run-off. Plan policy and SPG guidance are considered to be supportive of IACC's position with regard to the requirement for additional

information to enable it to fully understand the significance of the works as proposed.

Historic Environment

- 1.3.30 Strategic Policy PS9: Wylfa Newydd and Related Development states at criterion 8 that *“The scheme layout should avoid, minimise, mitigate or compensate..... for cultural and historic aspects of the landscape, both in the short and longer term.* Whilst Policy PCYFF 3 Design and Place Shaping states that all proposals must take into account the natural, historic and built environmental context. *Additionally, based on the issues raised in this Chapter, Policy PS 20, the overarching Policy that relates to preserving and where appropriate enhancing heritage assets is of particular relevance. In line with national planning policy and legislation, it supports proposals that fully consider the impacts on a range of heritage assets, which include Listed Buildings and their curtilages, and Registered Parks and Gardens.*
- 1.3.31 The Wylfa Newydd SPG recognises that within the A5025 Corridor there are a large number of designated historic assets including Listed Buildings and a registered historic park and garden. SPG GP 31 it states that development proposals should seek to avoid adverse impacts on the area's historic assets and their settings and that proposals should adopt high quality design principles that reflect and enhance local character providing a safe and accessible public realm. IACC's request that access and improved interpretation be provided at Capel Soar Standing Stone is supported by this policy guidance.
- 1.3.32 IACC would wish to receive Horizon's proposals for the provision of an information board or similar at Capel Soar Standing Stone.

1.4 Gaps in Information

- 1.4.1 Based upon IACC's knowledge of the site and the information provided by Horizon within its assessment a number of information gaps have been identified. These gaps are referred to above and include for insufficient information within the submitted sub-CoCP⁴¹.

Ecology

- 1.4.2 Horizon states that water vole displacement and destructive searches of burrows can take place under an NRW licence but IACC does require that this be clarified by NRW. The mitigation approach will need to be set out in detail in a site-specific method statement and approved by NRW. IACC would request that a draft method statement is prepared prior to the close of examination.
- 1.4.3 IACC also requires a location-specific scope for reptile/badger mitigation based on survey data and set out in detail in a method statement.
- 1.4.4 The ecological assessment is unclear on the requirement for and scope of measures to mitigate effects on bats, otter and fish. It also does not draw together a clear link between the assessment of effects on GCN, the underpinning GCN survey data and specific mitigation proposals. The

⁴¹ Examination Library Reference APP-420

requirement for GCN mitigation or otherwise at the Power Station Access Road Junction is not clearly set out and further information should be provided.

- 1.4.5 Based on the information provided it is unclear whether precautionary working practices to minimise the risk of harming common toads are planned/necessary/appropriate at this site. Any such measures, if required, should be set out in a method statement and agreed with IACC.
- 1.4.6 The method statements requested may be appropriately incorporated into a revised sub-CoCP. The updated sub-CoCP should also include for measures to displace any Section 7 mammals prior to earthworks and/or remove common toads; speed limits to avoid harming wildlife; measures to avoid creating wildlife refugia during construction; measures to control waste (operational and construction) to avoid increases in rat populations and associated effects on e.g. water voles; covering and sealing (e.g. using sand) excavations or providing a means of escape for trapped animals, such as ramps or gradually sloping edges/ends. Measures to avoid offences relating to breeding birds should apply to structures, including stone walls, as well as vegetation.

Landscape and Visual

- 1.4.7 IACC requires that ES Appendix G10-7 Tree Reports and Arboricultural Impact⁴² is updated to include a survey of the vegetation in the vicinity of the Power Station Access Road junction. The Landscape Effects Schedule (ES Appendix G10-3)⁴³ states that a section of cloddau will be lost at the Power Station Access Road junction but ES Figures D9-03 and D9-10⁴⁴ show a stone wall and hedgerow along the roadside at the location of this proposed junction. The location of the junction is not presently shown (so it is not clear how much of this existing landscape fabric would be removed) and the plans are based on the Phase 1 Habitat Survey undertaken on the WNDA in 2013 (so the survey data is more than 5 years old).
- 1.4.8 A survey should be undertaken to identify the locations of all cloddau field boundaries along the route of the A5025 off-line works, including those referred to in ES Chapter G10 and ES Appendix G10-3.
- 1.4.9 ES Figures G9-11 – G9-16 (Phase 1 Habitat Survey Results)⁴⁵ should be updated to show the proposed road and embankments superimposed in pale outline only (so that the field boundaries and other vegetation to be removed beneath the route can be clearly seen) and to show those field boundaries that are cloddau or turf-faced earth banks (both to be retained and to be removed).
- 1.4.10 The Site Clearance Plans (2.7 – 2.10: A5025 Off-line Highway Improvements – Section 1 (WN0902-HZDCO-OHW-DRG-00004), Section 3 (WN0902-HZDCO-OHW-DRG-00017 - 20), Section 5 (WN0902-HZDCO-OHW-DRG-

⁴² Examination Library reference APP-[342]

⁴³ Examination Library reference APP-[338]

⁴⁴ 'Phase 1 habitat Survey' and 'Habitats listed in accordance with section 7 of the Environment (Wales) Act within the survey study area', Examination Library reference APP-[237]

⁴⁵ Examination Library reference APP-[353]

00039 - 40) and Section 7 (WN0902-HZDCO-OHW-DRG-00052 - 53))⁴⁶ should be updated to identify any cloddiau and turf-faced earth banks to be removed.

- 1.4.11 Drawing IH306 (WN0902-HZDCO-OHW-DRG-00020)⁴⁷ should be extended southwards to include all of the Important Hedgerow to be removed to enable the new junction between the off-line route and the existing side road/A5025 to the south of IH306. The roadside hedgerow along the western side of the existing A5025, perpendicular to and northwest of IH509 (WN0902-HZDCO-OHW-DRG-00039)⁴⁸ should also be identified as an Important Hedgerow to be removed.
- 1.4.12 Clarification should be provided to IACC regarding the field boundaries (hedgerows and walls) illustrated in ES Appendix G10-9 A5025 Landscape Scheme – Figures 1 – 10 and DAS Volume 3 Appendix 1-5 Appendix A⁴⁹. These drawings show both existing vegetation to be retained (in green) and existing walls to be retained (brown dots) and also existing vegetation (in grey) and existing walls (dark grey) which also appear to be retained. These plans do not show the Order Limits and it may be the intention to distinguish between the existing vegetation and walls to be retained inside the Order Limits and the existing vegetation and walls that are outside the Order Limits and so would not be affected, but that does not appear to be the case in all locations.
- 1.4.13 Design principle 9 (DAS Volume 3 Appendix 1-5, paras 3.3.1 – 3.3.3 and table of design principles)⁵⁰ states “slackening of earthwork slopes to the south of the viaduct at section 3 must be provided to reduce adverse effects on landscape character and views from adjacent residential properties and the AONB ...”. Clarification is required as to whether the earthwork slopes have already been slackened or whether this is an additional mitigation measure that would be incorporated into the detailed design of the scheme.
- 1.4.14 Design principle 16 (DAS Volume 3 Appendix 1-5, paras 3.3.1 – 3.3.3 and table of design principles) states that “road alignments must work with existing land uses and agricultural field patterns to reduce field severance where possible”. All four sections result in field severance and small pockets of land but it would be difficult to avoid this. From the point of view of farmers and other landowners, access to fields separated from the main landholding by the new sections of road will be important and it is clear from the plans that various tracks have been incorporated into the Landscape Scheme to resolve access for some landowners.
- 1.4.15 Design principle 21 (DAS Volume 3 Appendix 1-5, paras 3.3.1 – 3.3.3 and table of design principles) states “slackening of earthwork slopes at Llanfaethlu off-line section must be proposed to reduce adverse effects on views from adjacent residential properties ...”. Clarification is required as to whether the earthwork slopes have already been slackened or whether this is an additional mitigation measure that would be incorporated into the detailed design of the scheme.

⁴⁶ Examination Library reference APP-[019-022]

⁴⁷ Examination Library reference APP-[020]

⁴⁸ Examination Library reference APP-[021]

⁴⁹ Examination Library reference APP-[344 and 410]

⁵⁰ Examination Library reference APP-[410]

- 1.4.16 Design principle 24 (DAS Volume 3 Appendix 1-5, paras 3.3.1 – 3.3.3 and table of design principles) states “where stone walls and cloddiau require removal as part of construction, their loss will be mitigated by re-building them using original materials where practicable in order to maintain historic field pattern”. Once information on existing cloddiau has been provided, it may be that cloddiau should be proposed along some sections of the A5025 off-line works and plans showing these should be submitted.
- 1.4.17 The proposed A5025 Landscape Scheme (illustrated in the A5025 Off-line Highway Improvements General Arrangement plans (2.7 – 2.10: Section 1 (WN0902-HZDCO-OHW-DRG-00002 - 3), Section 3 (WN0902-HZDCO-OHW-DRG-00013 - 16), Section 5 (WN0902-HZDCO-OHW-DRG-00037 - 38), Section 7 (WN0902-HZDCO-OHW-DRG-00049 - 51)⁵¹ and 2.6.1: Power Station access road junction (WN0902-HZDCO-OHW-DRG-00063)⁵² and also in ES Appendix G10-9 A5025 Landscape Scheme – Figures 1 – 10 and DAS Volume 3 Appendix 1-5 Appendix A⁵³ needs to be updated to show the locations of turf-faced earth banks and cloddiau to be re-built, to ensure that all parcels of land resulting from field severance by the new sections of the A5025 are provided with access and new field gates, and to incorporate the mitigation measures outlined above.
- 1.4.18 A5025 Off-line Highway Improvements Boundary Details drawing (WN0902-HZDCO-OHW-DRG-00068 in 2.7 – 2.10)⁵⁴ also needs to be updated to include a construction detail for a clawdd.
- 1.4.19 The Landscape maintenance strategy (DAS Volume 3, Appendix 1-5, paras 4.6.16 – 4.6.17 and Table 2)⁵⁵ for the soft landscape elements of the scheme is currently for 3 years following the completion of the works. This landscape management strategy needs to be for 5 years and also needs to include 5 years maintenance of the hard landscape elements (i.e. stone walls, cloddiau, turf-faced earth banks, fences, gates, stiles, footpath and cycle path surfacing, etc), as has been agreed for the A5025 On-line Highways Works.

Surface and Groundwater

- 1.4.20 Gaps in the information submitted by Horizon are considered to include the following:
- a) For Section 7 of the A5025, no substantive detail for Afon Cafnan culvert over bedrock cascade is provided (in contrast, this detail is provided for the culvert proposed for the Nant Llygeirian elsewhere on this section of the A5025). Outline drawings of potential approach/statements of culvert techniques should be provided.
 - b) Arrangements for drainage from road embankments and in particular the need for attenuation. The designs appear to show that in instances where only areas of new (steep) road embankments are drained, this passes direct to watercourses. IACC needs to understand whether this is assessed as being of

⁵¹ Examination Library reference APP-[020. 021 and]

⁵² Examination Library reference APP-[015]

⁵³ Examination Library reference APP-[344 and 410]

⁵⁴ Examination Library reference APP-[022]

⁵⁵ Examination Library reference APP-[410]

no consequence in terms of runoff rates, or whether allowances been made for pro-rata runoff rate reductions in the other attenuated sub-catchments).

- c) Information regarding the fall-back position to address the residual flood risk at the unnamed property section 3 (Afon Alaw viaduct) should such design prove physically/financially infeasible.
- d) Further detail including construction, abstraction quantity and purpose should be provided in relation to wells and private water supplies.

Design and transfer to public highway regime

1.4.21 The Highways Authority would note there is still outstanding information required by it:-

- a) Land transfer requirements to fully enable the Highway Authority to comprehend and establish the extent of land to be designated as a public highway which is to be maintained at public expense.
- b) Further to this, the IACC assumes that boundary features will not be maintained by the Highway Authority. However, should this prove to be different, the IACC requests a schedule of boundary features that the Highway Authority will be required to maintain following the implementation of the improvements. The schedule should be developed and finalised in agreement with the IACC as part of the Highways Collaboration Agreement.
- c) The access rights that will be granted to the Highway Authority to enable full access to all highway structures from all directions (including overbridges, underpasses and culverts) and surface water attenuation ponds for maintenance purposes.
- d) IACC as Highway Authority are willing and able to enter into agreements to facilitate the necessary works to the public highway in a manner which respects the Highway Authority's need to maintain control of the public highway network and to manage occupation of the carriageway it in the interests of public safety and effective traffic management. Horizon has not sought agreement on alternative means of gaining the rights required for these works. A S278 agreement has been successfully concluded between Horizon and IACC for the A5025 online works and IACC would be willing to progress such agreements (i.e. S278 and/or S38) to facilitate these Off-line works.
- e) IACC and Horizon to agree upon a Commuted Sum for the future maintenance of the new public highway.

1.5 DCO Obligations and Requirements

Requirements

1.5.1 Subject to the receipt of additional information IACC is likely to request amendments to the relevant sub-COCP. If this is not provided prior to the close of examination, the existing DCO requirement OH1 should be re-drafted to ensure that a detailed sub-CoCP is provided to and approved by IACC prior to commencement of development. In summary, the detailed sub-CoCP will need to include for:

- a) The further information and method statements summarised within Ecology, 'Gaps in Information';
 - b) Measures to notify businesses and publicise alternative routes for access;
 - c) A specific Public Rights of way management plan for the management of existing rights of way which are likely to be temporarily and permanently affected;
 - d) Measures to ensure that existing wells and PWS are protected and alternative arrangements to be delivered should effects occur;
 - e) Provision of a scheme to control invasive species that identifies the invasive species and the control measures to be employed, to be submitted to and approved by the Council prior to work commencing on the site;
 - f) Provision of a scheme that identifies the existing trees, scrub, hedgerows, watercourses and other landscape features (eg cloddiau, stone walls, earth banks) to be retained and the measures to be employed to protect these during construction, to be submitted to and approved by the Council prior to work commencing on the site;
 - g) A detailed construction transport method statement setting out routes to be used, specific measures to be put in place to ensure that construction traffic is properly managed relative to the A5025 work. Presently the sub-CoCP covers this within half of one page.
- 1.5.2 Should certain information requested above not be supplied during the examination IACC would require a requirement for a survey of the existing hard landscape elements within the DCO limits (fences, stone walls, cloddiau, etc) that identifies their locations, materials, condition and contribution to landscape character and visual amenity, including their screening value for neighbouring properties. This should be undertaken during winter and submitted to and approved by the Council prior to work commencing on the site.
- 1.5.3 IACC would also require historic landscape surveys, topographic and landscape survey and photographic surveys (as described in Wylfa Newydd CoCP paras 12.4.1 – 2). These will be a permanent record of the current landscape fabric and character of the site, will inform the detailed design of the A5025 Off-line Highways Works and will inform the reinstatement of landscape fabric disturbed by the works. The surveys should be undertaken during winter and summer and submitted to and approved by the Council prior to work commencing on the site.
- 1.5.4 A requirement for detailed designs for the attenuation ponds should be provided which should be more sympathetic to existing landscape character with greater landscape and ecological value. Details should be submitted to and approved by the Council prior to work commencing on the site.
- 1.5.5 To address identified visual impacts the following mitigatory or compensatory planting and footpath enhancements should be provided or agreed via a DCO requirement.

1.5.6 Section 1

- a) There are two visual receptor groups where consideration should be given to reinforcing existing off-site planting. At R4 IACC's review concluded that there could be limited scope whilst at Valley Cemetery existing boundary planting is less extensive with consequently greater scope for additional planting within and alongside the western boundary.
- b) Compensation in the form of improvements to the two PRowS (Definitive Map References 49/016/1 & 2 and 49/009/1) involving footpath and signage improvements.

1.5.7 Section 3

- a) The Landscape Scheme only proposes native hedgerow with trees at the northern end (plus grassland) and native hedgerow at the southern end (plus grassland) of Section 3. Subject to any ecological constraints, there may scope for some additional individual trees, shrubs with intermittent trees and/or native shrub planting. This would increase the filtering of views of the noise barrier and, for some visual receptors, their views along the carriageway.
- b) Off-site mitigation measures would require increased levels of signage and access and safety improvements for those PRowS that will remain open during the construction period e.g. PR10 and PR7. The improvements would extend into the operation period for temporarily closed PRowS, e.g. PR13, PR9, and PR8.
- c) Consideration should be given to reinforcing existing off-site planting to reduce effects upon visual receptor groups. This would be concentrated upon existing field boundaries formed by hedgerows and/or post and wire fences at Llanfachraeth and at PR8 with the reinforcement of hedgerow. Planting would also provide some additional screening of the southern end of Section 3 for residents at R23 Tyn Fynnon. In addition, IACC would wish to see planting on the southern side of the western end of T1. This would also provide some additional screening of the northern end of Section 3 for residents at R33 and users of the permanently re-routed PR13.

1.5.8 Section 5

- a) There is the potential for the implementation of limited additional on-site shrub and intermittent tree planting close to the junction of Section 5 with the former A5025 at Rhos-ty-mawr (R56).
- b) IACC is also of the opinion that there are opportunities for the provision of additional screening through the reinforcement of existing field boundaries at the western end of the Llanfaethlu – Llandeusant road (T4) and in the area between PR18 and Cae'r Bryniau (R53) and the northern section of Section 5.
- c) The small number of PRowS in the Section 5 study area appear to be easily accessible. There would be scope for improvements in tandem with IACC's wider recreation and access strategies.

1.5.9 Section 7

- a) Regarding receptors R76; R79; R80; R87 and PR23 there is scope for additional mitigation through the planting of hedgerow trees in a section of the hedgerow sited along the eastern corridor boundary.
- b) There are opportunities for off-site planting in two remnant fields that will be formed between the former A5025 and the eastern boundary of the corridor of Section 7 of the off-line A5025.
- c) The PRoW network in the Section 7 study area is observed in the baseline descriptions as being inaccessible. IACC considers that this situation could be remedied through improvements to management, access facilities (stiles, gates etc) and signage which would be developed in tandem with IACC's wider recreation and access strategies as set out in the ROWIP 2008-2018.

1.5.10 IACC will require a commitment that all new plants and seeds are to be of local/North Wales provenance and grown in a local nursery to acclimatise the plants to the local conditions prior to planting on the site and increase the likelihood of a successful landscape scheme. This needs to be implemented at least two years prior to the plants being needed on-site. Further information is also required with regard to the careful separation of topsoil, subsoil and overburden on the site during the cut-and-fill remodelling of the local topography, so that the appropriate topsoil and subsoil are used in the planting and amenity grassland areas (topsoil) and species-rich grassland areas (subsoil).

1.5.11 Further details on the design of the off-line highways improvements should be submitted to and approved by IACC prior to work commencing on the site, that:

- a) Include the proposed slackening of the earthwork slopes to the south of the viaduct (in Section 3) and at Llanfaethlu (Section 5) to reduce the adverse effects on landscape character and views from adjacent residential properties and the AONB.
- b) Incorporate the shared use footway/cycleway alongside the A5025 from where Sustrans Route 566 crosses the A5025 in Tregale (to the north of the Power Station Access Road junction) through the junction and on to where the alternative route of Sustrans Route 566 crosses the A5025 (to the south of the Power Station Access Road junction).
- c) Include any additional measures necessary to access fields severed from landholdings.
- d) Adjust the route of the shared use footway/cycleway in Section 5 so that it crosses the A5025 no more than twice and within a 40mph zone.
- e) Provides more tree planting to screen the new road, especially in the vicinity of the AONB and where small sections of fields have been severed and may not be suitable for other agricultural uses.
- f) Provides formal planting along the A5 approaching Valley, such as an avenue of trees alongside the A5.

- g) Includes the construction of cloddiau, stone walls or turf-faced earth banks along some roadside and field boundaries where appropriate.
- 1.5.12 IACC also requires the provision of a detailed hard landscape scheme, informed by the hard landscape survey, to be submitted to and approved by the IACC prior to work commencing on the site, and that includes, but is not limited to:
- a) Detailed plan showing the locations and dimensions of all hard landscape elements (ie stone walls, cloddiau, turf-faced earth banks, fences, gates, stiles, footpath and cycle path surfacing, etc).
 - b) Specifications and construction drawings for all hard landscape elements.
 - c) Programme of operations for the construction and maintenance of the hard landscape scheme for 5 years following the completion of the works.
- 1.5.13 A detailed soft landscape scheme is required to be submitted to and approved by IACC prior to work commencing on the site, and that includes, but is not limited to:
- a) All new native hedgerow, tree and shrub planting and species rich grasslands and other grasslands, etc as in the proposed A5025 Landscape Scheme (illustrated in the A5025 Off-line Highway Improvements General Arrangement plans (2.7 – 2.10: Section 1 (WN0902-HZDCO-OHW-DRG-00002 - 3), Section 3 (WN0902-HZDCO-OHW-DRG-00013 - 16), Section 5 (WN0902-HZDCO-OHW-DRG-00037 - 38), Section 7 (WN0902-HZDCO-OHW-DRG-00049 - 51), 2.6.1: Power Station access road junction (WN0902-HZDCO-OHW-DRG-00063) and also in ES Appendix G10-9 A5025 Landscape Scheme – Figures 1 – 10 and DAS Volume 3 Appendix 1-5 Appendix A, as updated).
 - b) Detailed schedule of plants for the hedgerow, shrub and tree planting to include species, sizes, numbers and planting spacing/densities.
 - c) Detailed schedule of species mixes for the proposed species-rich grassland areas and other grasslands, to include species and seed sowing rates.
 - d) Provenance and sources of all plants and seed mixes (provenance to be local or North Wales and plants to be grown in a local nursery on Anglesey for at least one year prior to planting to acclimatise the plants to the local conditions).
 - e) Detailed planting plans showing the locations of all plants to be planted and grasslands to be established.
 - f) Specification for the soiling, seeding, planting and maintenance operations.
 - g) Programme of operations for the establishment and maintenance of the soft landscape schemes for 5 years following the completion of the works.
- 1.5.14 IACC requires the provision of a detailed lighting scheme that minimises the number of lighting columns, avoids light spill onto surrounding buildings, watercourses and boundary features (to minimise night-time glow and effects on landscape character, the special qualities of the AONB and Anglesey's Dark Sky status aspirations), to be submitted to and approved by the Council prior to work commencing on the site.

- 1.5.15 The success of planting in screening the A5025 off-line works will be dependent upon how it establishes and the extent to which it is maintained. IACC wishes to see a DCO Requirement to monitor the planting for its ability to mitigate visual effects and to identify and deliver additional mitigations if considered appropriate by IACC.
- 1.5.16 Should further information regarding the requests relating to surface water not be forthcoming, IACC would wish to see an amended OH2 such that details are submitted to IACC for its approval prior to commencement of development (bedrock cascade and designs to mitigate flood risk). Similarly, IACC wishes to receive additional safeguards relevant to the protection of private water supplies which should include for an expansion of monitoring proposals and a protocol to set out the measures to be taken should water supply or quality be affected by the works.

1.6 S106 Obligations

- 1.6.1 IACC wishes to see a commitment from Horizon to fund via a DCO Obligation, off-site mitigatory and compensatory planting. This could be provided either directly by Horizon, with landowner agreement, or via a fund constituted for the purpose. IACC has identified several locations where planting would be appropriate and would welcome further discussion with Horizon on this matter and on opportunities for measures to enhance existing field boundaries, particularly cloddiau. Funding should be provided to maintain off-site planting for a period of five years.
- 1.6.2 The proposed Environmental Fund to be in place for the duration of the Construction Phase plus 10 years to fund landscape improvements in part of the AONB (local to the site). For example:
- a) A survey of hedges, stone walls and cloddiau to identify the extent and condition of traditional field boundaries.
 - b) A scheme for the restoration of traditional field boundaries.
 - c) Schemes for the restoration and enhancement of important habitats, such as woodland, hedgerows, roadside verges and red squirrel habitats and to improve the connectivity between habitats.
 - d) A scheme for the control of non-native invasive species.
 - e) Drainage management schemes for ditches and surface water courses, to enhance water quality for habitats and species, to improve agricultural land and to reduce flooding.
 - f) Footpath improvement schemes for existing public rights of way, including surfacing, gates, stiles, signage particularly in section 3 and 7.
 - g) The provision of interpretation signage and access improvements for the Capel Soar Standing Stone.
 - h) Rural skills programmes with local communities and schools.

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