

From: [PMO](#)
To: [Wylfa Newydd](#)
Subject: RE: IACC Deadline 2 Submission : Local Impact Report - Off site Power Station Facilities (email 29)
Date: 04 December 2018 20:08:34
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[Off-site Power Station Facilities.pdf](#)

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.*

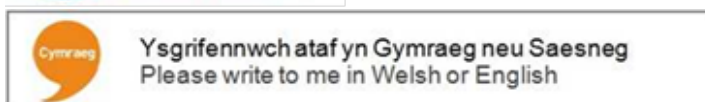
Bydd fersiwn Gymraeg yn cael ei ddarparu cyn gynted a phosib / *A Welsh version of the submission will be provided in due course.*

Cofion/ *Regards,*
Manon

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Mae'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 i'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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Ynys Môn

THE ISLE OF Anglesey

Wylfa Newydd Local Impact Report

Chapter 21: Off-site Power Station
Facilities

December 2018

PINS Ref: EN010007



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1.0 Off-Site Power Station Facilities

1.1 Context

- 1.1.1 Off-Site Power Station Facilities comprising the Emergency Control Centre (AECC) building, the Environmental Survey Laboratory Alternative (ESL) and the Mobile Emergency Equipment Garage (MEEG) are proposed to be located on relatively low-lying ground between two drumlin features. The landform gently falls from west, at approximately 55m AOD, to 48m AOD at the eastern site boundary.
- 1.1.2 The site which consists of previously developed and greenfield land fronts the A5025 to the west and is predominantly hardstanding, containing two existing commercial garages, a motor vehicle repair building and a single-storey dwelling. The site neighbours dwellings to the north and south. The site forms part of broken ribbon development to the east of the A5025. The eastern boundary of the Anglesey Area of Outstanding Natural Beauty (AONB) runs alongside the opposite side of the carriageway to the site.
- 1.1.3 The facility will be visible to residents immediately to its north and to those around Llanfaethlu church and its school and to users of parts of the footpath network. Views from the A5025 to the north and south are likely to be obscured in part by intervening built form and topography.
- 1.1.4 Coed Garreg-Lwyd Wildlife Site and ancient woodland and Llyn Garreg-Lwyd SSSI are both located approximately 750m to the north-west. There are limited records of water voles, smooth newts and breeding birds within 1km of the site. The site is located within an area at significant risk of flooding, as indicated by Horizon's own modelling (in addition to the surface water risk shown on the NRW surface water flood risk map). It is that survival of archaeological remains within the site will be limited as a result of prior disturbance during the construction and use of the existing garage.

1.2 Impacts and Evidence Base

- 1.2.1 The following sub-sections set out the local impacts which have been identified by IACC. Where there is no reference to a topic within this chapter, for example, cultural heritage, the Examining Authority can conclude that IACC has considered local impacts to be neutral for these elements.
- 1.2.2 The IACC confirms that this LIR chapter identifies the impacts of the proposed development in general and that the IACC do have detailed comments on the design of the proposal which it will make in a separate submission into the DCO process. However the IACC confirms that these comments on the detail design do not change the overall impacts identified in the LIR.
- 1.2.3 A departures [from DRMB design standards] report has been prepared for the A5025 offline works but not for other sites. The IACC requests that departure reports are required for all works affecting the public highway, creating roads which will become public highway or roads will be used by the public. IACC

would request that the Examining Authority require departure reports for this site to be submitted to allow proper consideration of the detailed design proposed.

- 1.2.4 Whilst Horizon has not identified any positive impacts arising from its proposals IACC is of the opinion that the commitment to remediate the site of the former vehicle garage, if undertaken correctly, would have a positive impact on soils and address any potential future pollution incidents. Further discussion on the approach which Horizon intends to take with regard to the decommissioning process is provided in the following sub-section.
- 1.2.5 Most of the impacts predicted to occur as a result of the construction, operation and decommissioning of the site are considered by IACC to be neutral. IACC has however identified some additional mitigation measures which it believes to be necessary to ensure that effects remain neutral. The mitigations listed below either extend or are in addition to those identified by Horizon within its environmental statement and associated documentation.

Ecology

- 1.2.6 Whilst Horizon's assessment lacks robustness in certain areas, the IACC is in general agreement with the conclusions made with regard to the level of effects upon ecological receptors. It is therefore concluded that effects will be neutral provided that the mitigation set out within the ES and the additional mitigation recommended by IACC is adopted.
- 1.2.7 Additional mitigation sought by IACC includes for the pre-construction survey of Building M3 and 'the old farm buildings' for bats. This is because no activity surveys have been undertaken whilst the baseline assessments are on surveys undertaken on nearby land in 2014. These surveys are considered to be out of date and inconsistent with survey guidance. Whilst roost surveys were undertaken in 2016, the buildings with the highest (moderate) bat potential (M3 and 'old stone farm buildings') have not been surveyed. Document 6.5.17 (Appendix 9-1)¹, suggests that Building M3 lies outside the application site yet the accompanying figure shows it within. The ES chapter notes that Building M3 was not surveyed in 2016 as at that point in time it lay outside of the proposed site boundary.
- 1.2.8 IACC is of the opinion that the change in site boundary over time during the evolution of the development proposals does not represent suitable justification for not undertaking a bat survey. IACC considers that the process of EIA should be to present sufficient information to the decision-maker to enable it to conclude the potential for significant effects. IACC would strongly advise that activity surveys at Building M3 are undertaken as soon as possible and reported within the timeframe of the ongoing DCO Examination process.
- 1.2.9 Committed mitigation should also be extended to ensuring that the lighting scheme is compatible with Bat Conservation Trust guidelines, that

¹ Examination Library reference APP-[255]

precautionary working practices for herpetofauna and Section 7 (mammals) are confirmed within the sub-CoCP² and that further detail is provided on the measures to be taken with regard to the effects of drainage/outfall construction on otter/water vole. IACC would also wish to see the method statements which are to be produced to ensure that works do not harm protected species.

Surface and Groundwater

1.2.10 Horizon has identified multiple minor adverse/minor beneficial surface water and groundwater effects which would be less than significant and are therefore neutral for the purposes of this report. Eighteen such effects assessed are detailed in Appendix I3-1³. IACC agrees with these conclusions subject to the following clarification.

1.2.11 IACC notes that the Flood Consequence Assessment identifies risks with a surface water flowpath and with the depth/velocity of flood water on the A5025 at the site entrance, and through the site. IACC recognises that Horizon has a proposed design that would intercept any flood water noting that this would be confirmed via detailed design with the future development site potentially experiencing flood depths of 0.022m in the 0.01% event.

1.2.12 IACC would note that the mitigation measures proposed would be reliant upon regular maintenance. A commitment to the undertaking of regular maintenance should be provided. Furthermore when undertaking the detailed design Horizon, and IACC need to be assured that the pipes draining the 'cattle grid' feature for intercepting A5025 surface water are of an appropriate scale/capacity and this information should be provided to IACC prior to commencement of development. Clarity is also sought as to whether the swale which would be connected to the feature would have pollution control valves to minimise the risk of it being a pollution pathway between the A5025 and the Afon Llanhyddlad.

Landscape and Visual

1.2.13 IACC notes that Horizon has identified some minor and not significant adverse effects upon the landscape character of the site and surrounding area, including a localised part of the AONB during the construction phase and IACC concurs with this conclusion. Opportunities to mitigate further the residual impacts of the development would include for the retention of more of the existing mature boundary vegetation as this may reduce these short-term effects further.

1.2.14 Proposed new planting at the start of the operational phase would provide some long-term beneficial effects on local landscape character. However, IACC is of the view that the proposed buildings and in particular the MEEG/AECC due to its scale, height and mass would be very noticeable in contrast with the current landscape character in both the AONB (Viewpoint 7) and in the local landscape

² Examination Library reference APP-[417]

³ Examination Library reference APP-[391]

(Viewpoint 8). Whilst the proposed new planting would progressively ameliorate these resulting adverse effects on landscape character they would be less successful in ameliorating effects on the AONB. The AONB boundary runs along the opposite side of the carriageway to the facility for a length not greater than 1km. The proposed lighting could also give rise to effects upon the adjacent AONB, as well as to local residents and ecological receptors (see above).

1.2.15 IACC would wish to see additional screen planting to be placed along the western and northern boundaries of the site which could consist of cloddiau topped with hedgerows. A similar approach should also be taken to the eastern boundary as an alternative to the freestanding stone walls and hedgerows proposed. IACC would also wish to agree final details including samples of the roofing and walling materials proposed for the buildings with consideration given to ways in which the appearance of the MEEG/AECC could be broken up visually. Similar requests for additional planting to mitigate otherwise significant visual effects upon local residents and users of the local footpath network are made below.

Socio-economics

1.2.16 Horizon states that there would be some generation of economic benefits through the construction of the offsite power facility including job creation and that there may be positive impacts on local supply chains through the use of local contractors and businesses. The ES chapter Volume E - Socio Economics⁴ records that there would be no significant adverse socio-economic effects and IACC would agree with this conclusion.

1.2.17 Horizon is currently committed to a local labour target of 22% across the Wylfa Newydd project. IACC considers that the type of construction activities required to build off-site facilities readily lend themselves to the local supply chain and requests that a commitment is given by Horizon to a higher target for the employment of local people at the facility along with a commitment to the local supply chain. A higher target for local labour supply should be independent to the baseline target for the Wylfa Newydd project as a whole but should not lead to a lower percentage to be achieved on the Power Station site for example.

1.2.18 IACC requests that Horizon investigates the potential for the ICT infrastructure required for these sites to also provide improved broadband connectivity and mobile coverage to adjoining communities as a legacy benefit.

Soils and Geology

1.2.19 IACC considers that the baseline conditions have generally been characterised appropriately and the potential effects of the development have been acknowledged. IACC would however wish to see further detail in the Off-Site Power Facilities sub-CoCP⁵ to improve its enforceability and precision and this

⁴ Examination Library Reference APP-241

⁵ Examination Library reference APP-[417]

request is referenced below within the consideration of additional/amended DCO requirements.

1.2.20 Negative Impacts identified by IACC include for the impacts arising from the development upon landscape and visual receptors.

Landscape and Visual

1.2.21 IACC has identified a significant negative impact upon landscape fabric which is a receptor group that has not been considered by Horizon. IACC considers that the loss of existing hedgerows and grassland to the south of the existing depot would give rise to significant negative impacts in the medium-term (up to ten years), until proposed replacement planting matures. IACC would wish to see the mitigation proposals made by Horizon amended to include for the use of cloddiau topped with hedgerows, as referenced above.

1.2.22 IACC has concluded that the construction and operational phases of and decommissioning of the off-site power station facilities would generate a small number of adverse significant visual effects upon the groups of visual receptors located within the Zone of Theoretical Visibility (ZTV) and the study area. Some of these effects have been identified by Horizon, however IACC concludes that there are in addition, several visual receptors where the magnitude of visual change should be assessed as being higher than that which has been reported within Horizon's submitted document, Appendix E 10-3⁶.

1.2.23 At Horizon's Viewpoint 2⁷, a group of community receptors who would be likely to sustain significant adverse effects are those at the recently opened Rhyd y Llan Primary School (S1). Their proximity combined with the openness of their slightly elevated views are the primary factors. Increasing the number of isolated hedgerow trees between the site and the school would potentially provide additional partial screening in the latter's northern views.

1.2.24 At Viewpoint 4⁸, a proportion of the CR2 group who are the residents of the group of properties located close to the A5025 to the north of Llanfaethlu could be significantly affected. The proximity of the off-site power station facilities to some of these properties when only limited intervening screening is available will result in residents at a small number of these properties sustaining significant adverse effects. A contributory factor is that the on-site landscape planting is proposed to be almost entirely located in the southern part of the site, consequently it will not provide screening for residents of properties to the north. IACC would therefore wish to see a proportion of larger trees being planted alongside the existing northern and eastern boundary hedgerows to the site. These should be planted before or at the start of the construction phase as their size would provide some instant filtering in views from the north and east.

⁶ Examination Library reference APP-[259]

⁷ Examination Library reference APP-[260]

⁸ Examination Library reference APP-[260]

- 1.2.25 IACC has also identified a second location for additional on-site planting. This is the on-site access traffic island where shrub and/or tree planting would provide some screening and filtering of views for visual receptors located to the west and north-west of the site. It should also be planted early.
- 1.2.26 There will be significant effects upon recreational receptors using the local PRoWs network. The first of these PRoWs (FP2 at Viewpoint 7⁹) lies within the AONB and users of the footpath will not benefit from the establishment of the on-site planting that is proposed by Horizon, IACC concludes that significant negative impacts will continue throughout the operation period unless limited off-site planting is provided that will establish to filter views.
- 1.2.27 Users of the second PROW (FP1 at Viewpoint 8¹⁰) will also sustain significant negative impacts but only until the planting proposed for the southern and south-eastern site boundaries becomes established and provides some screening.
- 1.2.28 Compensation measures in the form of improvements to the local PRoW network should be provided. These will include for signage, surfacing and the provision of access gates/stiles as appropriate. Improvements should be consistent with IACC's wider recreation and access strategies as set out in the ROWIP 2008-2018 and the replacement ROWIP once approved as well as the AONB Management Plan.
- 1.2.29 Off-site mitigation planting would be beneficial for views from the AONB on the field-side of the stone-wall that runs alongside the western verge of the A5025.

1.3 Policy Position

- 1.3.1 Planning Policy Wales (2016), (PPW) along with TAN23 (2014) encourages economic and employment growth alongside social and environmental considerations within the context of sustainable development. However, where a proposed development would cause unacceptable environmental or social harm, development demand should be steered to an alternative location, unless the harm is outweighed by the additional benefit of development at the proposed site under consideration.
- 1.3.2 IACC's Joint Local Development Plan (JLDP) Policy PS9 Wylfa Newydd and Related Development (Criterion 1) requires proposals for development related to the Wylfa Newydd project to consider relevant policies in the JLDP and any relevant Supplementary Planning Guidance. IACC is therefore of the opinion that Policy CYF 4 (New large single user industrial or business enterprise on sites not safeguarded or allocated for employment purposes) is relevant. This allows for large single industrial or business uses on sites not allocated for employment or business units provided that the proposal conforms to the criteria as listed within the policy. The first criterion within the policy specifies the locational requirement for the development proposal stating that the

⁹ Examination Library reference APP-[260]

¹⁰ Examination Library reference APP-[260]

proposal must be located on a site located within or adjoining the development boundary of the sub regional centre, urban or local centre. The remaining criterion within policy CYF 4 specifies the need for the proposal to conform to the tests as outlined in PPW and TAN23. Furthermore, where appropriate the site should be located within an existing building or on previously developed land and the scale, type and design of the development should be appropriate for the site and the locality.

- 1.3.3 The proposed off-site power station facilities would be located on a site classified as 'open countryside' within the JLDP and IACC considers that the proposal does not therefore conform to the principles as outlined in Policy CYF 4. Further Policy PCYFF 1 (Development Boundaries) stipulates that development outside the development boundaries should be resisted unless it is in accordance with specific policies within the JLDP or national planning policy or that the proposal demonstrates that its location in the countryside is essential.
- 1.3.4 The Wylfa Newydd SPG (Policy GP31) supports the principle of locating the Off-Site Facilities along the A5025 corridor provided that the proposal complies with the policies contained within the JLDP and there is support for the relocation of the existing business on site. IACC notes that no details have been included within the submitted documents relating to the relocation of the existing business and the availability of a suitable site to accommodate the business.
- 1.3.5 Horizon's documentation submitted with the application stipulates that there are specific locational requirements regarding the proposed off-site power station facilities requiring a location upwind of any prevailing potential airborne hazards and between 1.5km - 7.5km from the main site. The Site Selection Report (Volume 1 and 4) establishes a search area derived from the locational requirements and details the selection process which has resulted in the Llanfaethlu site being Horizon's preferred option.
- 1.3.6 IACC would agree that an alternative (more appropriate site) which would comply with the principle of Policy CYF 4 cannot be found within Horizon's search area. IACC also recognises the fact that most of the site is previously developed land and notes its accessibility to the A5025. For these reasons IACC is content with the principle of this development at the site subject to the following site-specific policy issues.

Ecology

- 1.3.7 The policies that are relevant to IACC's requests for additional mitigation include Section 6 of the Environment (Wales) Act 2016 (Further detail is provided in paragraph 5.3.1 of WNDA Chapter). IACC is of the opinion that this national legislation and policy, supported by local policy below justifies its request for additional mitigation requested above.
- 1.3.8 JLDP Strategic Policy PS5 Sustainable Development at criterion 6 states that all proposals should *'protect and improve the quality of the natural environment,*

its landscapes and biodiversity assets' whilst criterion 8 of Strategic Policy PS9 states 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*'.

- 1.3.9 JLDP Policy AMG5 Local Biodiversity Conservation 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.
- 1.3.10 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*'.
- 1.3.11 As submitted, Horizon's proposals fail to provide sufficient justification for the conclusions reached. IACC is particularly concerned about the lack of up to date bat surveys and requires additional detail on measures to protect species to be set out within the sub-CoCP. The local development plan and SPG policy referred to above provides the justification for requesting that the sufficient level of detail is provided in order that IACC can be satisfied that the site's ecology can be protected.

Landscape and Visual

- 1.3.12 Strategic Policy PS9: 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 screen planting, where its provision will potentially reduce adverse visual impacts sustained by residents.
- 1.3.13 Strategic Policy PS9, 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. Llanfaethlu. This could be relevant should the proposed on-site landscape works not provide their assumed filtering and screening role effectively. IACC therefore 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.
- 1.3.14 Any localised screen planting within or close to the communities will need to accord with many of the criteria in Policy PCYFF4: 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*”.

- 1.3.15 The requested on-site and off-site mitigation planting for the Off-Site Power Station Facilities is further supported by certain Objectives and Guiding Principles contained within the Wylfa Newydd SPG. Guiding Principles that are especially relevant are: GP 27: North Anglesey Key Development Principles – sub-principle v) referring to the need for a Community Resilience Fund (CRF) for unquantifiable and unforeseeable impacts and which will set out measures to enhance north Anglesey as a place to live, work and visit.
- 1.3.16 As shown on Figure E10-2 the Off-Site Power Station Facilities are located just to the east of the Isle of Anglesey AONB. As they are very close to the AONB boundary, one of the six themes of the AONB Management Plan Review: enhancing countryside and coastal character is applicable through management objective 3: development which states that “*planning policies will ensure that all development within and adjacent to the boundary of the AONB is compatible with the aims and objectives of the designation and the new developments enhance local character.*” Policy CCC3.2 states that all new developments within 2km of the AONB “*will be expected to adopt the highest standard of design, materials and landscaping ...*”
- 1.3.17 The AONB Management Plan Review concludes that the attainment of four of these themes can be supported by the implementation and management of the identified further mitigation and compensation measures. Achievement of the AONB Theme: Enhancing Countryside and Coastal Character supports IACC’s request for the implementation and management of the proposed further mitigation and compensation measures referenced above. This request is further supported by reference to the Isle of Anglesey Landscape Strategy (Update 2011). The site is located within With LCA 5: North West Anglesey, and the strategy advises that development should seek to use landform and vegetation patterns to mitigate impacts, ensure that the scale, form and materials respect the local vernacular and utilise and retain local field boundary patterns, including cloddiau and hedgerows.

Surface and Groundwater

- 1.3.18 JLDP Strategic Policy PS 5 Sustainable Development, criterion 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.
- 1.3.19 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.
- 1.3.20 SPG GP22 Conserving the Water Environment also 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 were 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.

- 1.3.21 Local policy which is designed to negate or reduce local impacts provides support to require Horizon to ensure the flood risk measures are 'comprehensive'; and to ensure that the natural environment is fully protected through the additional measures which are sought by IACC.

Soils and Geology

- 1.3.22 JLDP Strategic Policy PS 5 Sustainable Development, criterion 7 requires the protection of soil quality. Wylfa Newydd SPG GP 21 Conserving and Enhancing the Natural Environment recognises that the remediation of contaminated land can act as a mitigation measure for effects upon the natural environment. The re-use of what is mainly a previously developed and potentially contaminated site would be consistent with these elements of local policy.

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 and the consequential need for additional information are set out below:

Ecology

- 1.4.2 Certain surveys are considered to be out of date whilst building M3 has not been surveyed for bats. Pre-construction surveys should therefore be undertaken in sufficient time to allow either for changes to the design or for the submission and granting of licences prior to development commencing. Further information on the approach to mitigating construction effects upon habitats and species on and off site would be covered within a revised DCO requirement which is referenced in the next sub-section.

Landscape and Visual

- 1.4.3 IACC considers that there are gaps in the assessment present by Horizon. With regard to Landscape receptors, there is no baseline survey or assessment of effects upon landscape fabric nor a detailed hard and soft landscape scheme. Both are necessary to fully understand the impacts of the proposed development.
- 1.4.4 The manner in which residential visual receptors in a settlement or community are grouped ignores the variations in baseline conditions, in the magnitude of change and hence upon the significance of residual effects that are likely to be sustained between residential receptors are missed. IACC considers that an assessment of effects upon individual residential properties is necessary to

properly inform the consideration of effects and necessity or otherwise of further mitigation.

- 1.4.5 Changes are also required to the submitted landscape scheme to include the retention of more existing vegetation, a continuation of the low stone wall and the use of planting alongside the A5025 if practicable. Native hedgerow and hedgerow trees along the northern boundary of the site, additional planting including cloddiau elsewhere along other site boundaries as well a proposal to secure off-site planting are also required. IACC requires a commitment to provide compensation measures through improvements to the quality of public footpaths in the area consistent with IACC's wider recreation and access strategies as set out in the ROWIP 2008-2018 and the replacement ROWIP and AONB Management Plan.
- 1.4.6 IACC requests that Horizon investigates the potential for the ICT infrastructure required for these sites to also provide improved broadband connectivity and mobile coverage to adjoining communities as a legacy benefit.

1.5 DCO Obligations and Requirements

- 1.5.1 IACC would request that the submitted Off Site Power Station Facilities sub-CoCP¹¹ is revised to include the information requested above or that the DCO requirement OPSF1 is amended such that a revised code of construction practice is submitted to and approved by IACC prior to commencement of development at the site. The revised document should include for the preparation of ecological method statements which should be submitted to and approved by IACC. The document should include confirmation that the site lighting would be consistent with Bat Conservation Trust Guidance and should also include for further detail on the mitigation of contamination and the provision of a Soil Management Plan prior to work commencing.
- 1.5.2 Horizon must be required to submit details of any bat surveys undertaken to building M3 and other buildings in the form of pre-construction surveys. Whilst this is referenced within the sub-CoCP¹², the lack of a survey to M3 remains a concern of the IACC.
- 1.5.3 IACC also requires a DCO requirement requiring Horizon to submit a revised and more detailed hard and soft landscaping scheme and planting schedule identifying additional areas for planting on and off-site consistent with IACC's request under 'Landscape and Visual' above. The scheme should include for the use of cloddiau. The plan should be informed by a baseline survey of existing landscape elements (hard and soft) in addition to an assessment of their contribution to landscape character and screening value. IACC can provide a detailed list of the information it requires to form part of the landscaping scheme.

¹¹ Examination Library reference APP-[417]

¹² Examination Library reference APP-[417]

- 1.5.4 If elevational treatment remains to be agreed prior to the close of the DCO Examination, IACC would require that a DCO requirement is provided which requires Horizon to submit details illustrating the elevational treatment to the buildings, notwithstanding those submitted to date. The requirement should include for the prior agreement by IACC to the materials to be used and for the submission of material samples for approval. Consideration/justification should also be provided by Horizon with regard to the siting of the proposed buildings as IACC would wish to see the distance between the security fence and northern boundary of the site increased to allow for screen planting between the fence and adjacent residential properties and an increase in the distance between the ESL building and western boundary to soften the appearance similarly.
- 1.5.5 Unless information is submitted during examination IACC also requires an amended DCO requirement OPSF3 to include for reference to drainage details in addition to the buildings.
- 1.5.6 Mitigation of disturbance of archaeological remains could be adequately achieved by the implementation of an agreed scheme of archaeological investigation which should be the subject of a DCO requirement enabling discharge via IACC, in consultation with GAPs rather than via reliance upon the controls set out within section 11.4 of the sub-CoCP¹³.
- 1.5.7 Potentially forming part of the S106 obligation, Horizon should identify a sum of money and mechanism for the delivery of off-site screen planting and for the delivery of compensatory measures to improve the quality and usability of the public right of way network surrounding the site. The fund should also exist to deliver off-site screen planting within the community local to the site and it should run for the period of the construction phase plus 5 years.
- 1.5.8 Given the impacts upon the AONB, the IACC and consistent with its requests elsewhere within this LIR, request that the proposed Environment Fund is established for the duration of the construction phase plus 10 years to fund landscape improvements within the AONB local to the site. This fund would cover some of the measures set out above concerning footpath improvement and maintenance and off-site planting but be extended to include the restoration of field boundaries and important habitats, the control of invasive species, drainage management and the provision of rural skills programmes with local communities and schools

¹³ Examination Library reference APP-[417]

PINS Ref: EN010007



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