

From: [PMO](#)
To: [Wylfa Newydd](#)
Subject: RE: IACC Deadline 2 Submission : Local Impact Report - Introduction (email 3)
Date: 04 December 2018 20:37:35
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[Annex 1D-1O \(Batch 2 of 2\).zip](#)

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.*

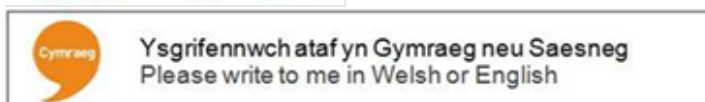
Bydd fersiwn Gymraeg yn cael ei ddarparu cyn gynted a phosib / *A Welsh version of the submission will be provided in due course.*

Cofion/ *Regards,*
Manon

Swyddfa Rhaglen Ynys Ynni /
Energy Island Programme Office
01248 752435 / 2431
PMO@ynymon.gov.uk



www.ynysynnimon.co.uk / www.angleseyenergyisland.co.uk



[Dilynwch ni ar Twitter](#) / [Darganfyddwch ni ar Facebook](#)

[Follow us on Twitter](#) / [Find us on Facebook](#)

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

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

rwydweithiau mewnol ac allanol.

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

This email and any files transmitted with it are confidential and may be legally privileged. They may be read copied and used only by the intended recipient. If you have received this email in error please immediately notify the system manager using the details below, and do not disclose or copy its contents to any other person.

The contents of this email represent the views of the sender only and do not necessarily represent the views of Isle of Anglesey County Council. Isle of Anglesey County Council reserves the right to monitor all email communications through its internal and external networks.

You are welcome to deal with the Council in Welsh or English. You will receive the same standard of service in both languages.

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

Mr Kieran Somers
Horizon Nuclear Power
Sunrise House
1420 Charlton Court
Gloucester Business Park
Gloucester
GL3 4AE

Sent by Email

DYLAN J. WILLIAMS BA (Hons), MSc, MA, M.R.T.P.I.
Pennaeth Gwasanaeth – Rheoleiddio a Datblygu Economaidd
Head of Service – Regulation and Economic Development

CYNGOR SIR YNYS MÔN
ISLE OF ANGLESEY COUNTY COUNCIL
Canolfan Fusnes Môn • Anglesey Business Centre
Parc Busnes Bryn Cefni • Bryn Cefni Business Park
LLANGEFNI
Ynys Môn • Isle of Anglesey
LL77 7XA

ffôn / tel: (01248) 752499
ffacs / fax: (01248) 752192

Gofynnwch am / Please ask for: Dylan Williams
E-bost / Email: DylanWilliams@ynysmon.gov.uk
Ein Cyf / Our Ref:
Eich Cyf / Your Ref:

Dyddiad / Date: 27/09/2018

Dear Kieran,

OFFICIAL SENSITIVE

Review of Horizon's DCO Submission (Dalar Hir)

1.0 Introduction

- 1.1 Following the submission of the Isle of Anglesey County Council's (IACC) Relevant Representations to the Planning Inspectorate, the purpose of this letter is to provide you with further detail and clarity on the IACC's position in relation to Dalar Hir Park & Ride and to seek agreement on key issues and mitigation measures. The IACC is eager to discuss and agree as many issues as possible prior to the DCO Examination to ensure that the proposed development is acceptable and that the Examination and hearings can be as focused and productive as possible.
- 1.2 Where adverse impacts cannot be avoided, appropriate mitigation should be implemented to offset the identified adverse impacts. Compensation will be required in respect of residual impacts that cannot be mitigated. The aim of this letter is to outline these impacts and to define the mitigation measures required to make the development's impact acceptable in planning terms.
- 1.3 The matters raised below represent part of the IACC's ongoing engagement with you on the DCO application and are made in response to the application documents as submitted. The IACC reserves the right to add or amend these issues (and raise new issues) as necessary in its Written Representations and Local Impact Report.

2.0 Context

- 2.1 This proposal is for a temporary park and ride facility during the construction period for the Wylfa Newydd project with the site being reinstated to its original agricultural usage once the New Nuclear power station has been completed. The facility would accommodate up to 1,900 construction worker cars, including provision for disabled drivers, 55 minibuses, and 35 motorbikes. Ancillary buildings would provide limited facilities for the shuttle bus drivers

Croeso i chi ddelio gyda'r Cyngor yn Gymraeg neu'n Saesneg. Cewch yr un safon o wasanaeth yn y ddwy iaith.
You are welcome to deal with IACC in Welsh or English. You will receive the same standard of service in both languages.

and construction workers. The works to create the facility would include for the creation of parking areas, cycle facilities, landscaping, fencing and the creation of a new roundabout located near the existing A55-A5 junction (Junction 4).

- 2.2 There would be a maximum total of 78 daily return bus movements from the park and ride facility to the Power Station Site made up of three staggered morning shifts and three staggered night shifts. There would be an additional number of bus movements at times when there are significant changes in workers accommodated at the site campus.
- 2.3 Horizon's documentation states that construction would begin in the first year of project commencement and that the construction process itself would take eighteen months.

3.0 Local Policy

- 3.1 IACC recognises that the proposed development will form part of the Development Consent Order application and therefore will not be determined by the Isle of Anglesey County Council. Notwithstanding, the Local Development Plan and Supplementary Planning Guidance will carry significant weight in the decision-making process. The following paragraphs summarise the Council's current policy position regarding this element of the application.
- 3.2 Policies PS 4, PS 9 and PS 12 of the JLDP, 8.3.3 of PPW and GP15 of the Wylfa Newydd SPG (2018) include reference to park and ride facilities. Policy TRA 1 refers to permanent park and ride facilities and so is not applicable with this development..
- 3.3 Criterion 1 in Policy PS 12 states that in order to minimise the need for construction workers and workers that service the facility to travel by private car the site should be within or adjacent to development boundaries of Centres located along or close to the A5/ A55 or in other locations along the A5/ A55. For sites in other locations along the A5/ A55 the site should be part of a comprehensive approach to mitigate the transport effects of the Project, takes account of IACC's preference to consider sites closer to the Centres, has due regard to landscaping and environmental considerations, and where provision for travel to the site by sustainable means, including public transport and cycling, can be provided.
- 3.4 In light of both local and national policy in support of park and ride facilities the principle of the development is acceptable, however, consideration needs to be given to the location and accessibility issues contained within Policy PS 12. Further consideration of the rationale for the single site approach as opposed to a multi-site is also requested. Having a number of park and ride sites could further reduce the distance travelled by car to the main site in line with criterion 3 of Policy PS 9 and criterion (vii.) in Guiding Principle GP 15 of the Wylfa Newydd SPG and this matter is returned to later in this letter.
- 3.5 Criterion 1 ii Policy PS 12 states that for sites along the A5/A55 due regard should be given to the provision for travel to the site by sustainable means, including public transport and cycling. Criterion 2 requires provision of new and enhancement of existing pedestrian and cycle paths and improvement to public transport services. Criterion 3 of Policy PS 9 states that proposal should include multi-modal solutions and investment that encourages travel by public transport, walking and cycling and other sustainable forms of transport. In addition criterion 12 of PS 9 states that all proposals should be appropriately serviced by transport infrastructure including public transport and where there is insufficient transport linkage the provision of sustainable transport options shall be provided to mitigate the impacts.
- 3.6 IACC recognise that there is an intention to provide a new bus stop on the A5 in close proximity to the pedestrian / cycle access to the park and ride facility and this is supported.

Croeso i chi ddelio gyda'r Cyngor yn Gymraeg neu'n Saesneg. Cewch yr un safon o wasanaeth yn y ddwy iaith.
You are welcome to deal with IACC in Welsh or English. You will receive the same standard of service in both languages.

Figure F1-4 of the Figures Booklet shows proposed bus shelters within the park and ride facility. It is unclear whether the local bus service will have access onto the site to drop off people at these bus stops to encourage more people to use local bus service to access the park and ride facility. To encourage additional public transport journeys to the site consideration could be given to facilitating the provision of additional local bus services during peak time at the start and end of the shift as an option to the use of private cars. This would further reduce the number of car journeys in line with National Planning Policy and align with criterion 12 of Policy PS 12. This is in line with clause (f) of criterion (ix) in Guiding Principle GP 15 of the Wylfa Newydd SPG (2018) which states 'Improvement to public transport services, particularly bus and rail provision.' Policy ISA 1 of the JLDP in reference to contributions for infrastructure list transport infrastructure including public transport.

- 3.7 IACC would also request confirmation that there will be a framework in place to monitor the use of car sharing, shuttle buses etc. to the park and ride facility which will be robust enough to identify any weaknesses/threshold levels exceeded and include a clear approach as to how any necessary additional mitigation will be provided in a timely manner.
- 3.8 A development at this scale is expected to provide a comprehensive energy assessment (PCYFF 5) and a water conservation statement (PCYFF 6). Consideration should be given to these matters.
- 3.9 In view of the local policy context set out above the following main issues have been identified.

4.0 Summary of Main Issues

4.1 Historic Environment

- 4.1.1 Horizon have identified a number of archaeological heritage assets within the site which they have assessed as being of between regional (Medium) and negligible value. Effects in all cases would be large (total removal or disturbance of remains), although the magnitude of any residual effect would be reduced to small following the application of an agreed scheme of archaeological mitigation.
- 4.1.2 No significant adverse effects are identified in the assessment as arising through change to setting or historic landscape character.
- 4.1.3 In the view of IACC the assessment of value of archaeological remains within the site as medium appears appropriate, although the identification of individual features as heritage assets rather than as elements of a wider, coherent heritage asset makes the assessment difficult to follow. Any effects would be of moderate significance in the absence of mitigation. It is agreed that no significant adverse effects would arise through direct disturbance of archaeological remains where an appropriate mitigation scheme is in place.
- 4.1.4 The Environmental Statement (ES) notes that there are relatively few designated heritage assets within the study area or ZTV and appropriately considers visibility of the proposed park and ride facility from these heritage assets. While it would also be appropriate to consider visibility of the proposed park and ride facility in views of these assets more fully, it is agreed that the proposed park and ride facility would present limited change in the settings of these assets and no significant adverse effects would arise.
- 4.1.5 Similarly, the limited scale of the park and ride facility and its location directly adjacent to the existing dual carriageway would limit change to historic landscape character and no significant adverse effects would arise. This effect would be mitigated by the restoration of

park and ride facility to farmland on completion of the construction programme.

- 4.1.6 There is no consideration of the effects of lighting on setting or historic landscape character. While the lighting to the proposed park and ride facility would be seen in the context of the A55/A5 junction and would not contribute to any significant adverse effect, measures should be taken to mitigate any sense of intrusion that may arise from the increased visibility of lighting in this area.

Further Information Required

- i. No mitigation is identified in respect of noise or visual intrusion arising from the construction and operation of the proposed park and ride facility, although it is clear from landscape and noise chapters that mitigation in the form of screening planting and working hours restrictions would be in place. Change to setting and historic landscape character arising from light spill should also be mitigated appropriately and further information on the measures to achieve this should be provided. Subject to the agreement of these mitigation measures, no further mitigation would be required in respect of the historic environment.

Summary of Mitigation and Compensation Measures to be secured in the DCO

- i. Mitigation of disturbance of archaeological remains could, in this case, be adequately achieved by the implementation of an agreed scheme of archaeological investigation which should be the subject of a DCO requirement.

Natural Environment

4.2 Ecology

- 4.2.1 IACC's review of the ecological assessment contained within the ES and supported by appendices is that there are limited omissions from the baseline information. In places the ecological assessment conclusions are considered to be vague and not clearly linked to the underpinning baseline survey data/reports, site design and planned/embedded mitigation. This limits the robustness of the ecological assessment in places. Most of the issues identified are however considered to be relatively minor and unlikely to substantively alter the overall conclusions regarding the significance of effects:

Birds:

- 4.2.2 The Phase 1 survey report acknowledges the suitability of the site for a number of Amber and Red List species that are not mentioned in the ecological assessment. As the park and ride facility is expected to result in loss of expanses of semi-natural farmland habitat, including semi-improved grassland and marshy grassland, as well as field margins/hedgerows, the ecological assessment would be more robust if informed by breeding/wintering bird surveys, plus an assessment of effects on foraging barn owl. These surveys would inform the assessment of the effects of the park and ride facility, as well as Wylfa Newydd DCO as a whole.
- 4.2.3 IACC questions the valuation ('low value') of Valley Wetland RSPB Reserve as it is understood that the Reserve includes SSSIs. The assertion that notable bird species do not occur in sufficient numbers at the Reserve to warrant its categorisation as 'Medium' or greater nature conservation value is also unsubstantiated.

- 4.2.4 The completed park and ride facility is expected to replace nesting habitat for swallow and house sparrow, although it is not stated specifically how this will be achieved.

Bats:

- 4.2.5 Effects on foraging/commuting bats are not assessed, despite bat roosts having been recorded nearby at Cartio Mon. No bat activity surveys of the site have been undertaken, which is inconsistent with the latest bat survey guidance (Collins et al 2016).

Otter and Water Vole:

- 4.2.6 The categorisation of the water vole population as 'low value' is potentially misleading. This may be consistent with the overall approach to the evaluation of ecological receptors, however established/self-sustaining water vole populations would almost certainly be of national (Wales/UK) nature conservation value. There is a focus of water vole activity within the site, which is part of the wider population associated with the ditch network. There is residual uncertainty as to whether water vole habitats/burrows will be avoided or the extent of mitigation and displacement. It would be preferable if the effects on water voles were clearly assessed specifically within the context of:
- ii. The anticipated extent of habitat loss, the methods of water vole displacement and exclusion and habitat reinstatement and reconnection;
 - iii. The implications of effects on other ditches (e.g. Ditches 6, 7 and 8) and any opportunities to retain/enhance ditches;
 - iv. A commitment to establishing/maintaining a fenced, 15m wide (minimum) riparian buffer to either side of waterbodies that support this species and any that are potentially suitable for future water vole colonisation;
 - v. Enhancing/strengthening the fenced riparian buffer through habitat enhancement and clarifying the status of the riparian buffer pre-development, post-development and post decommissioning and reinstatement;
 - vi. Measures to mitigate the risk of increased predator (rat) populations associated with waste (in food/organic waste) arising from construction and the operational park and ride facility; and
 - vii. Post-construction management and monitoring and post-decommissioning/reinstatement commitments to water vole habitats/conservation in consultation with NRW.
- 4.2.7 The majority of this information is covered/cross referenced generally in the documents, however an assessment clearly focused on these points would be more robust and in-keeping with the increasingly threatened status of water vole.

Section 7/Section 42 Mammals

- 4.2.8 The justification for scoping-out mammal species that are of Principal Importance could be explained in more detail in the view of IACC. This should also be considered within the context of any potential effects of the wider Wylfa Newydd DCO on these species and any working practices/mitigation to be implemented to minimise the risk of effects on these species.

Amphibians

- 4.2.9 It is uncertain whether the A5 is a complete barrier to Great Crested Newt (GCN) dispersal between Pond 13/16b and the site. There are also ponds situated within 500m of the site (inc. Pond 11b) that were not surveyed, including due to access restrictions. This means there could be a limited/residual risk of GCN dispersal onto the site. The baseline data were collected in 2014, which would in many circumstances be deemed out-of-date for the purpose of EIA, particularly given the proximity of the site to ponds supporting GCN.
- 4.2.10 The assessment of effects on common toad would benefit from considering the anticipated status of toads within the site, relative to the surrounding area/Anglesey and any potential effects of the wider Wylfa Newydd DCO on this species. Large common toad populations would not necessarily be of low nature conservation value.

Invertebrates

- 4.2.11 Effects on terrestrial invertebrates are not assessed. As the development is expected to result in loss of expanses of semi-natural habitat, including semi-improved grassland and marshy grassland, as well as field margins/hedgerows, the EIA would be more robust if informed by terrestrial invertebrate surveys.
- 4.2.12 It is unclear whether effects on aquatic invertebrates, including notable species recorded during the freshwater surveys are fully assessed.

Terrestrial and freshwater habitat

- 4.2.13 The assessment of effects on terrestrial/freshwater habitats is generalised. Hedgerows, ponds, semi-improved grassland and marshy grassland can be habitats of Principal Importance and there may be wider losses of these habitats associated with Wylfa Newydd DCO. It would be preferable if these effects were addressed or scoped-out more specifically (approximately/quantitatively and/or qualitatively).
- 4.2.14 The ecological assessment should clarify whether effects on any notable species, such as corn spurrey, field woundwort and alder tongue fungus are assessed or scoped-out.

EIA Approach

- 4.2.15 The ecological assessment conclusions are in places not well-linked to the underpinning baseline survey data/report. This is likely to be due to short-hand explanation rather than significant omission from baseline/assessment. It would be clearer if the impacts were assessed receptor-by-receptor rather than combined under e.g. 'Mortality'.
- 4.2.16 The conclusion that buffer zones and planting will have a minor positive effect on commuting bats, badger, breeding birds, and common toad is generalised/unsubstantiated.
- 4.2.17 The system of evaluation of ecological receptors is in places unhelpful, for example leading to the categorisation of the water vole population and RSPB Reserve as being of 'low value'.

4.2.18 It would be preferable if the ecological assessment explained why the site will ultimately be reinstated to farmland/grassland, rather than a mosaic of habitats of greater nature conservation value as part of a package of measures to compensate for, or offset, the effects of Wylfa Newydd.

Further information required:

- i. Confirmation that the park and ride facility's lighting scheme for construction and operational periods is informed as far as practicable by Bat Conservation Trust guidance.
- ii. The approach to mitigating the effects of drainage/outfall and bridge construction on otter remains to be agreed with NRW. This may need to take into account the fact that natal holts can be at risk of disturbance at 250m from construction activity. Therefore pre-construction otter surveys may need to extend to this distance from construction/earthworks areas and confirmation that this will occur should be provided.
- iii. There remain uncertainties regarding the scale of habitat loss/disturbance along watercourses that support water voles, with associated uncertainty regarding the mitigation approaches to be employed. Water vole mitigation will need to be planned in considerable site-specific detail and set out clearly in a method statement. This should include the establishment, reinstatement and protection of a connected riparian habitat corridor and supervision of all works in proximity to ditches that support this species, as well as detailed, specific approaches to vegetation clearance, water vole displacement/exclusion, destructive searches and trapping. The mitigation method statement would be subject to review/approval by NRW. It has been assumed that water vole displacement and destructive searches of burrows can take place under an NRW licence – this will need to be clarified by NRW.
- iv. Significant adverse effects on herpetofauna appear to be unlikely, however based on the information provided in the ecological assessment it is unclear whether precautionary working practices to minimise the risk of harming great crested newts and common toads are planned/necessary/appropriate at this site. Any such measures, if required, would be set out in a method statement.
- v. It is concluded that the operational park and ride facility is expected to replace the lost nesting habitat for swallow and house sparrow, although it is not stated specifically how this will be achieved and this information should be provided within the sub-Code of Construction Practice.
- vi. Other measures should be considered for incorporation into the sub-CoCP, such as measures to displace any Section 7 mammals prior to earthworks and/or remove common toads; speed limits to avoid harming wildlife (hedgehog, badger, otter); measures to avoid creating mammal refugia during construction; measures to avoid eel mortality, including any eels crossing damp grassland; measures to control waste (operational and construction) to avoid increases in rat populations, Measures to avoid disturbance of any setts that may remain undetected e.g. obscured by dense scrub. Measures to avoid offences relating to breeding birds should apply to built structures, including stone walls, as well as vegetation.

- vii. Without prejudice to IACC's overall position with regard to the future use of the site an explanation as to why the park and ride facility will ultimately be reinstated to farmland/grassland, rather than a mosaic of habitats of greater nature conservation value, possibly as part of a wider package of measures to compensate for or offset the effects of Wylfa Newydd. The ecological assessment does not refer specifically to opportunities for habitat creation as part of the park and ride facility or as part of site decommissioning and reinstatement.

Summary of Mitigation and Compensation Measures to be secured in the DCO:

- i. IACC would request that the submitted sub-CoCP is revised to include the information requested above or that the DCO requirement PR1 is amended such that a revised plan is submitted to and approved by IACC prior to commencement of the construction of the park and ride facility.

4.3 Surface and Groundwater

- 4.3.1 IACC has assessed the relevant chapter and supporting appendices, including the Flood Consequence Assessment and concludes that for the majority of identified receptors which could be impacted, suitable mitigations are identified, and the potential magnitude of change is agreed. IACC does however have significant concerns with regard to potential flood risk impacts at the site and the implications that these may have for the operational phase of the park and ride facility. It notes that Horizon has committed to further mitigation following more detailed assessment, and states that it will 'design out' the risk. Despite this the ES does judge the potential flood risk effect as 'significant' and Horizon states that the detail to address risk referred to will be provided post-DCO. This is not acceptable to IACC which requires sufficient information to be provided in advance of any decision to enable it to fully assess the implications of flooding at the site.
- 4.3.2 With respect to the issue of flood risk referenced above, IACC has the following detailed comments.
- 4.3.3 Modelling appendix F8-1-3 (Figures 7.1 and 7.2) indicates some areas of car park could flood to depths in the 1m to 1.5m deep band (pluvial/fluviol 100 yr event + cc). These are similar depths to the baseline scenario, although the areas at risk change in response to proposed changes in land levels. Figures 7.3 and 7.4 indicate that pluvial/fluviol flood depths could increase by up to 0.1m or more over some of the future car park areas, but that flood risk to off-site areas is reduced over the baseline, and importantly, flood risk to other areas of the park and ride facility is also reduced.
- 4.3.4 The modelling report is clear that there will be flood risk impacts on the park and ride facility, but these identified risks are not carried forward or developed further in the FCA or in the ES chapter F8 to state in detail how the infrastructure design will respond to or assess the consequences of this risk to people and vehicles, or to construction operations during a flood event.
- 4.3.5 With regard to the approach to site drainage document F1/F8 identifies that the site is upstream of the 'Llynnau y Fali – Valley Lakes' Site of Special Scientific Interest (SSSI)/one part of which (Llyn Dinam) also being a SAC. The documentation also provides details of the drainage measures (SuDS), to be employed but unlike with the Main Site, it does not specifically mention silt/mobilised nutrient in runoff management. IACC notes that a package plant is proposed to treat foul sewage given that the proposed toilet facility would not be connected to any existing foul sewer and it concludes that there are potential impacts on water quality. Horizon must therefore set out how effective the

package plant will be through the seasons or in instances of malfunction and should provide information on how much storage (volume/time allowance) is to be provided should the package plant fail, and the discharge automatically stop.

Further information required:

- i. Further detail is required on the approach to the management of future car parking areas that will be at risk of flooding - people, vehicles and impacts on construction operations at the Main Site. Horizon should set out the procedures to be undertaken in the event that a flood event is forecast to occur. More information is also required on inclusion of suitable design measures to manage flood risk such as the re-profiling of ground levels and other flood risk management measures. This is essential, as satisfactory delivery of this is required to ensure that impacts on other identified flood risk receptors are avoided. Measures should also cover 'management for exceedance' - i.e. how rainfall in excess of infiltration capacity/surface water runoff above gully capacity will be safely managed on site.
- ii. With regard to water quality IACC would request that Horizon confirm the proposed SuDS management train measures so that IACC can have confidence that proposed mitigations will ensure no impact on downstream SSSI/SAC. Confirmation should include reference to specification of materials/aggregate to avoid altering water chemistry, and for subsequent monitoring. IACC also requests that Horizon consider a further stage in the management train be included for the impermeable areas (roads/busways/hardstanding). This is because the present system is based on a pipe network + tank attenuation and IACC is of the opinion that a swale or similar before the final outlet would provide a further step to manage water quality (storage, bio-processing, capture of contaminants).
- iii. Package sewage plant – it is noted that the plant's discharge will automatically shut down should treated water quality be unacceptable. Horizon should provide information on the amount of storage that is to be incorporated to handle flows whilst plant discharge is shut and to set out the trigger for this shut-down such that low-level pollution may/may not occur without the plant's discharge shutting off.

Summary of Mitigation and Compensation Measures to be secured in the DCO

- i. IACC may require additional mitigation based upon the further information received.

4.4 Landscape

4.4.1 Dalar Hir is not within any landscape designations. The site is over 2.5km from the Anglesey Area of Outstanding Natural Beauty (AONB) and over 9km from the Mynydd Mechell and Malltreath Marsh and Surrounds Special Landscape Areas (SLAs) so is unlikely to have any significant direct or indirect effects on the features, special qualities or purposes of these landscape designations.

4.4.2 With regard to the landscape elements on the site, Horizon's intention to retain and enhance boundary walls, hedgerows, etc has been previously welcomed by IACC. Whilst the site design and landscape scheme have been designed to retain some landscape elements, some sections of species rich and/or important hedgerows will be lost and details of the landscape planting and maintenance to be undertaken for the duration of the operational phase and for the reinstatement phase are minimal. IACC notes that there is no assessment of impacts on landscape fabric and therefore no information on the landscape and amenity value of the principal landscape elements on the site. Where

elements are identified, there is an inconsistency between what is shown in the DAS and some of the figures accompanying the assessment. For example, DAS Figure 17 suggests that Hedgerow H16 is a defunct and species poor hedgerow whereas the survey records show it as species rich. Of particular concern is the apparent failure to take into account the 8 important hedgerows shown on Figure F11-1; these are not shown in DAS Figure 17 nor referenced within the DAS text.

Construction Phase

- 4.4.3 IACC agree with Horizon, that there are likely to be some moderate, short-term and significant adverse effects on landscape character as a consequence of the construction activities. These effects are likely to extend across the site and into the surrounding area, up to approximately 1.0km from the site boundary. Measures to mitigate the effects could include for the retention of more of the existing mature boundary and internal vegetation than is currently proposed as this could slightly reduce the short-term construction effects on the character of the local landscape (see further information below).

Operational Phase

- 4.4.4 As illustrated by the photomontages from Viewpoints 2 and 4 in Figures 01 - 04 (Figure booklet – Volume F), the presence of the large numbers of cars and hardstanding, internal roads, bus facilities building, lighting columns and site security boundary fencing during the operational phase would completely change the rural character of the site landscape, resulting in a major medium-term and significant adverse effect on the landscape character of the site. The park and ride facility would also be a very noticeable additional feature which would contrast with the current landscape character in the surrounding area resulting in a moderate medium-term and significant adverse effect on the landscape character of the surrounding area, up to approximately 1.0km from the site boundary.
- 4.4.5 The same photomontages suggest that the existing and currently proposed new planting and grasslands would do little to ameliorate these adverse effects on local landscape character within five years. More planting, for example around the security fence would noticeably reduce the effects on landscape character in the surrounding area.
- 4.4.6 Consideration should be given to incorporating some additional planting along the western and eastern boundaries of the site, allowing the existing boundary hedgerows to grow much taller, incorporating planting around the outside of the security fence and, if feasible, reducing the number of lighting columns. The bus facilities building has a low profile and so does not break the skyline when viewed from Viewpoint 4, for example, but could be further mitigated by selecting an appropriate style and colour for the external cladding which could help to assimilate this building into the landscape.

Decommissioning Phase

- 4.4.7 IACC agrees with the landscape assessment conclusions that there are likely to be some moderate short-term and significant adverse effects on the landscape character of the site and surrounding area as a consequence of the decommissioning activities, with a reversal of effects on landscape character once the reinstatement works on the site have been completed and have had time to establish.

Combined Topic Effects

- 4.4.8 IACC agrees with Horizon's assessments that the combination of increased noise levels during construction, operation and decommissioning would result in an increased perception of adverse changes to local landscape character. As the adverse effects on

landscape character would be significant then it is likely that these effects would be perceived as significant by most people.

Further information required

The following additional information and mitigation should be submitted:

- i. Figures 2 and 3 (in App F9-1 Dalar Hir Extended Phase 1 Habitat Survey and HIS Survey) - should be updated to illustrate the locations of all of the hedgerows numbered in Table 3 in Appendix C of App F9-1, so that the condition, species richness and composition of all the hedgerows on the site can be ascertained.
- ii. DAS Figure 17 (Volume 3, Appendix 1-3) - should be checked for consistency with the Habitat Survey and updated as necessary.
- iii. An additional figure should be provided that illustrates the eight important hedgerows defined under the Hedgerow Regulations 1997 (for cultural value) within the site (as shown on Figure F11-1) and all other key landscape elements on the site, with an assessment of their landscape, cultural and amenity value.
- iv. Dalar Hir Park & Ride scheme – the design should be modified to retain more of the existing species rich hedgerows, important hedgerows and hedgerow trees on the site.
- v. The Landscape Masterplan (DAS Figure 21) should be modified to correctly show the locations of the existing landscape elements to be retained and enhanced and to clearly show the areas of grassland and the various different types of planting proposed.
- vi. Sources of plants to be used in the landscape and reinstatement schemes – all trees, hedgerow and shrub plants and seeds should be of local/North Wales provenance and Horizon should provide further information regarding how they will secure sufficient quantities of suitable plant stock and seeds, and acclimatize these to the local conditions prior to planting and seeding, in order to achieve successful landscape and reinstatement schemes. Ideally, this will be by the establishment of a plant nursery on the Island, which would need to be operational at least two years prior to the plants and seeds being needed on-site.
- vii. Security fence – mitigation measures should be proposed to minimise the presence and visibility of this fence, such as the use of recessive colours, routing alongside existing hedgerows (but outside the root zone), providing planting inside and outside the fence line and the use of alternative security measures for controlling internal pedestrian and vehicular circulation, e.g. ditches, bunds, stone walls, fences, etc with the security fence limited to the perimeter of park and ride facility.
- viii. Further information should be provided on the likely quantity and quality of fill required to raise the levels (as shown in the cross sections in DAS Volume 3, Appendix 1-3) and the quantity and quality of topsoil and subsoil required for reinstatement of ground levels, planting and seeding during the decommissioning phase. The feasibility of landscape/screening bunds to accommodate all site-derived soils not required during the operational phase which should be retained

on-site for re-use during decommissioning and reinstatement of the site should also be considered.

- ix. Assessment of effects on landscape fabric - an assessment of the likely direct effects (adverse and beneficial) of the construction, operational and decommissioning phases of the park and ride facility on the existing landscape fabric (elements) of the site should be provided.
- x. Environmental Lighting Impact Assessment – for the lighting proposed on the site, with mitigation measures proposed to limit the effects of the lighting on nearby waterbodies, watercourses, retained hedgerow and boundary habitats (which are also landscape elements) and on nearby sensitive visual receptors.

Summary of Mitigation and Compensation Measures to be secured in the DCO

The following measures may require amendments to or the creation of new, DCO requirements.

- i. Historic landscape surveys, topographic and landscape survey and photographic surveys which will provide a permanent record of the current landscape character of the site, will inform the detailed design of the park and ride facility and will inform the landscape scheme and landscape reinstatement of the site.
- ii. The detailed design of the stone walling proposed along the A5 (to close the existing layby) (as shown on Figure 1-3 DAS Figure 21).
- iii. The detailed design of the proposed 1.8m high security fence around the site and the alternative security measures for controlling internal pedestrian and vehicular circulation.
- iv. A detailed lighting scheme incorporating the mitigation measures necessary to minimise the impacts of the lighting on sensitive ecological, landscape and visual receptors.
- v. Detailed designs of the buildings and other above ground structures to include scale, height, character, building mass and choice of surface colours, materials and finishes that are in keeping with the essentially rural character of the site and surrounding area.
- vi. A scheme for the control of invasive non-native species.
- vii. A detailed landscape scheme for the A55 to include new boundary tree and shrub screen planting.
- viii. A detailed landscape scheme for the site to include: the form and location of landscape/screening bunds to accommodate all site soils not required during the operational phase which should be retained on-site for re-use during decommissioning and reinstatement of the site; planting around the security fence and in some of the proposed grassland areas to achieve visual screening of the proposed development during operation, in particular, along the western and eastern boundaries of the site; further details on the proposed new boundary tree and shrub screen planting to be established for the A55 and A5; measures to protect the existing heritage assets, habitats and landscape features to be

retained; the list of typical plant species for the hedgerow, shrub and tree planting and grassland areas, expanded to give local provenance, plant sizes, numbers, plant spacing/densities; and a specification for the soil preparation, planting, seeding and maintenance operations to be undertaken.

- ix. Without prejudice to IACC's overall position with regard to the future use of the site, a detailed landscape reinstatement scheme for the site to include: plant species for the hedgerow, shrub and tree planting and grassland areas, local provenance, plant sizes, numbers, plant spacing/densities and a specification for the re-grading, soil preparation, planting, seeding and 10 year maintenance operations to be undertaken.

4.5 Visual

- 4.5.1 IACC has undertaken a full review of the detailed viewpoint assessments contained within Appendix F10-3 of the submitted documentation and the summaries which are presented within document F10. It has concluded that the assessments accurately reflect the level of effect that would be generated at each stage in the park and ride facility lifecycle. The construction, operation and decommissioning of the park and ride facility would generate only a small number of adverse significant visual effects upon the groups of visual receptors located within the ZTV and the study area. IACC does conclude however that there are a small number of visual receptors where the magnitude of visual change should be assessed as being higher than has been assessed by Horizon.
- 4.5.2 Examples of differences between what is reported within the ES and the assessment undertaken by IACC include visual receptors for the construction and decommissioning periods at Viewpoint 2 and for the operational period at Viewpoint 3. It is the opinion of IACC however, that these changes do not result in changes to the significance of the residual effects which remain not significant.
- 4.5.3 At Viewpoint 6 for transient receptors on the A5, IACC's assessment also differs with regard to the magnitude of visual changes for the construction and Year 1 and Year 5 of the operation period. For the construction period and Year 1 of the operation period the increases lead to it a conclusion that receptors will sustain medium significance of residual effect i.e. significant effects.
- 4.5.4 The Council has also re-assessed the visual effects upon residents at the Gwyddor Residential Home and identified and included an estimated 12 residential properties in the ZTV in the study area that are sited outside the defined communities. It has concluded that significant adverse effects will be sustained by residents at the Gwyddor Residential Home and Castell and requests for additional mitigation are set out below.

Further information required

In summary, IACC would wish the following:

- i. A proportion of larger trees are planted alongside the existing northern and eastern boundary hedgerows. These should be planted before or at the start of the construction phase. This type of planting would provide some instant filtering in views from the north and east. A second location for possible further on-site planting is the on-site access traffic island. This 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 park and ride facility and should also be planted as early as feasible in the construction period.

- ii. It is noted that in section 2.1.29 of Appendix 1.3 in the DAS there are observations about the “*varied success*” of the recent planting on the eastern and southern site boundaries with trees dying or stunted in some areas. This observation implies that the detailed planting plants and management, including replacement planting, must respond to detailed variations in physical characteristics across the site and IACC would require that management has the flexibility to respond to variations in the establishment success of the planting and species rich grassland.
- iii. Section 9 Post-operation of Appendix 1.3 in the DAS implies that the additional planting that will be provided in the decommissioning period, primarily gapping up retained hedgerows and reinstatement of original hedgerow pattern, would be subject to a “*long-term landscape management strategy*” as stated in Table F10-5 in the LVIA chapter of the ES (F10). Clarification needs to be provided on the composition and responsibility for the implementation of the long-term management strategy. It is also not clear from Section 9 or from the Reinstatement Plan in Figure F1-5 which, if any, of the sections of new hedgerow planting will be cloddiau or hedge banks. Consideration should be given to ensuring that a proportion of the new hedgerow section planting consist of cloddiau.
- iv. IACC has concluded that there is scope for some significant adverse visual effects to be reduced by the implementation of selective off-site mitigation planting. This would be in the form of reinforcement of the field boundary hedgerows or cloddiau located to the north and north-east of the site where some field boundaries have been lost or are in poor condition. As noted above, IACC is of the opinion that the magnitude of change in the operation period that will be sustained by receptors at Castell and those travelling along the adjacent minor road would benefit from field boundary reinforcement in their current largely open southern views towards the park and ride facility.
- v. A specific potential further off-site planting opportunity has also been identified for the western boundary of the Gwyddfor Residential Home. This could be within the Home’s curtilage or in the form of a shelterbelt on the eastern side of the adjacent field.
- vi. A final potential location for off-site planting is the provision of enhanced scrub and tree planting in the narrow strip of land to the south of the site between the A5 and A55. This area is mostly wetland and ponds so IACC accepts that there might be limited scope for tree planting to the east of the enhancement and reinforcement planting which is already proposed on Figures F1-3 and F1-5. Any planting proposals would need to be developed in consultation with ecological consultants’ requirements.
- vii. With regard to off-site planting that is on public or third party land, a commitment must be given to the provision of an appropriately funded and monitored management programme. Confirmation of landowner consent will also be required. Planting programmes should be implemented and funded for an agreed period to allow the establishment of the planting so that it can fulfil its function(s) as quickly and effectively as possible.

Summary of Mitigation and Compensation Measures to be secured in the DCO

- i. On -site mitigation measures to be presented in the context of as per last two bullets points set out under preceding landscape section taking into account the detailed visual design components listed above. Off-site mitigation measures as per detailed visual design components listed above.

4.6 Socio-economics

- 4.6.1 IACC notes that Horizon have undertaken a socio-economic impact assessment of the park and ride facility and has identified receptors within a defined local area of influence (LAI) that include the Gwyddfor Residential Home and local businesses including Cartio Môn Karting immediately adjacent to the site. Consideration has also been given to public safety and to the loss of up to 15ha of agricultural land for the operational period of the park and ride facility.
- 4.6.2 Horizon states that there would be some generation of economic benefits through the construction of the park and ride 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 records that there would be no significant adverse socio-economic effects and IACC would agree with this conclusion subject to the receipt of further clarifications that are requested below.
- 4.6.3 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 the park and ride facility 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 park and ride facility along with a commitment to the local supply chain. A higher target for local labour supply should be independent to the baseline target of 22% previously stated by Horizon for the Wylfa Newydd project as a whole. A higher target for this and potentially other AD sites should not lead to a lower percentage to be achieved on the Power Station Site, for example.

Further information required

- i. IACC requests that Horizon consider a higher target for the recruitment of local people during the construction and operation phases and sets out how it will encourage local businesses to engage in the construction of this facility. This includes the operation of the buses, for example.

Summary of Mitigation and Compensation Measures to be secured in the DCO

- i. Dependent upon the further information received, a commitment to a higher percentage of local labour and supply chain involvement for the park and ride facility with compensatory measures identified should the agreed higher figure fail to be achieved.

4.7 Traffic and Transport

- 4.7.1 IACC has reviewed the Horizon TA and Appendix H reports for the park and ride junction and Junction 4. It notes that Horizon concludes that there is sufficient capacity at the proposed roundabout as well as Junction 4 (grade-separated dumbbell to the south)

junction. Without the relevant traffic data for the junctions, as well as the junction models, IACC is not able to confirm whether it agrees with these conclusions.

- 4.7.2 IACC is also concerned that Horizon has submitted insufficient evidence within the documentation to demonstrate the operation of the car park during the shift arrival and departure periods in the morning and evening. IACC wishes to understand how the interactions between queue lengths because of the entrance barrier and shuttle bus movements may affect the operation of the proposed roundabout junction, particularly regarding delay on the Fford Llundain/London Road arm. IACC notes that ES Volume F does not include a traffic and transport assessment of the junction or of the operation of the park and ride facility. Furthermore the traffic flows at the Dalar Hir junction shown in Appendix C-3 Traffic Flows do not reflect the demand for the park and ride facility in terms of car and shuttle buses. Horizon is also requested to reduce the use of the private car to the park and ride facility and to provide more detail on how the shuttle buses will operate both to this facility and direct to the Power Station Site.
- 4.7.3 Related to its earlier concerns regarding flood risk, IACC wishes to reiterate that the capacity of Area 5 may be compromised due to such issues and notes that this would have a significant effect upon the number of spaces available. The issue of flood risk, plus the requirement to avoid environmentally sensitive areas within the site suggests to IACC a lack of contingency should Horizon's proposed car share scheme be less effective than is currently assumed. The importance of monitoring is therefore reinforced.

Further information required

- i. The following information is required in order to demonstrate that there will be no issues with queuing back to the junctions:
 - Identification of how the barriers will operate, e.g. ANPR software, and anticipated time required for vehicles to pass through barrier;
 - How car park will be controlled and managed in the event of a breakdown/issue at the barrier within the car park;
 - Information on how the different parking areas will be allocated to workers, particularly Areas 2, 3 and 4, and how the one access/exit point for these areas will be managed to ensure efficiency.
- ii. The following information is required to enable IACC to better understand the capacity assessment work:
 - Turning traffic flows for 2016, 2020, 2023 and 2033 in the reference and 'with- development scenarios;
 - Junctions 9 models for the Dalar Hir roundabout and the two A5/A55 roundabouts.

Summary of Mitigation and Compensation Measures to be secured in the DCO

- i. The provision of a specific sub-code of operation practice establishing the measures to control the operation of the park and ride facility and contingencies for queuing and situations where full or partial closure of the facility is required due to flooding or other unforeseen events.

5.0 Code of Construction Practice CoCP

- 5.1 IACC supports the formation of a Community Liaison Group as set out within the sub-CoCP. IACC recognises that this be a mechanism in which communities can be informed of forthcoming works and in which Horizon can respond directly to community concerns due to matters arising from construction works. IACC will require that a representative of the Public Protection Department shall be in attendance all the meetings to respond to any potential Environmental Health related concerns and would request that Horizon confirm this appointment.

Noise

- 5.2 The Noise and Vibration Management Strategy contains reference to the noise and vibration control measures which include for the monitoring of locations representative of noise sensitive receptors to ensure that during construction, levels will remain below those permitted under the intended Section 61 (S61) approval. The S61 application must set the thresholds and details of the monitoring programme including monitoring equipment, locations, frequency and duration of measurement and personnel skills required. It is the opinion of IACC that the proposed monitoring programme is likely to involve a combination of continuous and short-term spot check measurements, and review of these initial results to determine if ongoing monitoring is required. All monitoring results must be made available to IACC.
- 5.3 The programme for monitoring operational noise at the park and ride facility must be established and agreed with the IACC prior to commencement of operation. It is anticipated that monitoring will likely include off-site spot check noise surveys at receptors, and some on-site monitoring near particular noise sources at long-term intervals. Initial monitoring should be carried out quarterly, with results reviewed to determine if the frequency of monitoring should be adjusted.

Air quality, dust and odour

- 5.4 Horizon have not provided Amber and Red trigger levels for human receptors within the sub-CoCP relevant to the construction of the park and ride facility. IACC would wish to agree these prior to a decision being made on this application. It is clearly beneficial to both parties that trigger levels provide adequate protection to local residents whilst being attainable.
- 5.5 Horizon make no reference to undertaking continuous monitoring of particulates (total particulates, PM10 and PM2.5) using an Osiris optical particulate analyser for this site. IACC would expect to receive confirmation that such monitoring would be undertaken and would wish to agree threshold levels with Horizon.

Summary of Mitigation and Compensation Measures to be secured in the DCO

- i. Either through a detailed sub-CoCP or via the S61 process further details on the monitoring and reporting of air, dust, noise and vibration should be agreed with IACC. This is to include agreement of thresholds.

6.0 Other matters

Croeso i chi ddelio gyda'r Cyngor yn Gymraeg neu'n Saesneg. Cewch yr un safon o wasanaeth yn y ddwy iaith.
You are welcome to deal with IACC in Welsh or English. You will receive the same standard of service in both languages.

- 6.1 IACC requires that the facility be completed and operation in advance of the First Nuclear Concrete for Unit 1 which is programmes as being Year 3, Q1. This will require facility completion by year 2 Q4 and IACC would wish to agree with Horizon a mechanism by which it can ensure that this and the other key mitigations identified are operational in sufficient time.
- 6.2 Whilst IACC accepts the principle of a park and ride facility, it remains in disagreement with Horizon's strategy which suggests that only one such facility is sufficient on the Island. It is the view of IACC that additional facilities should be provided at strategic locations along the highway network because such facilities would reduce journey lengths by private car and provide resilience to Horizon if flooding or other incidents partially or fully closed the park and ride facility at Dalar Hir.
- 6.3 In the event that the park and ride is closed temporarily there will be a need to identify alternative parking arrangements. IACC would wish to see an agree the details of procedures to be put into place. If procedures are not agreed then IACC would expect Horizon's mitigation to involve a reduction in the scale of activity at the main site as a means of reducing parking demand. IACC does not wish to see a situation where workers prevented from using the park and ride park indiscriminately on the local road network.
- 6.4 The park and ride facilities which are proposed to be provided at the park and ride facilities are considered by IACC to be, at best, the minimum necessary and essentially not fit for purpose. Actual facilities for workers using the park and ride facility are limited to basic toilet facilities which given the size of the structure proposed appear to have little capacity to cater for the number of people using the park and ride facility on any working day. Given that the Power Station Site will be worked throughout the year, and the need for drivers to wait for the shuttle buses in all types of weather, facilities of a higher standard to those proposed are required. As a minimum IACC would expect Horizon to provide a waiting room or similar style terminal building including basic refreshments and other facilities.
- 6.5 IACC notes Horizon's proposals to reinstate the site post operation to agricultural use and earlier in this letter has raised to the potential to reinstate at least part of the site for the primary purpose of habitat creation. Given the proposed eight years long operational period for the park and ride facilities, IACC's position on the appropriateness of the proposed reinstatement at Dalar Hir may change as national and local planning policy changes. As such, IACC would request that Horizon provide a commitment to the potential submission of a planning application for the future re-use of the site if this is the most suitable option at the time.

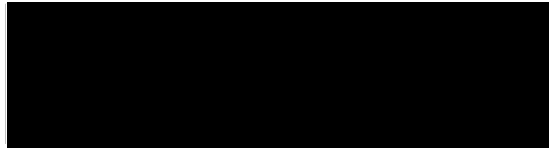
7.0 Conclusion

- 7.1 The proposed park and ride facility at Dalar Hir presents one of Horizon's key mitigations against the effects that may otherwise occur from the levels of construction traffic generated by the construction of the Wylfa Newydd development. The site's location at Dalar Hir was identified as a result of a site search exercise undertaken by Horizon. In principle, and on balance, the site selected is considered to be compliant with relevant development plan policy and the Wylfa SPG. There remain however, a number of details to be agreed concerning the design of the park and ride facility and the extent to which Horizon have adequately mitigated identified significant effects. Furthermore, the sustainability of the park and ride facility could be improved through a commitment to enhanced public transport provision alongside or directly into the site and the sustainability and resilience of the wider

project itself would be improved by the identification of additional, similar facilities on the Island. The risk (in terms of resilience and contingency) due to potential flooding issues remains a significant concern to the IACC. Horizon must provide suitable mitigation to overcome this substantial risk.

- 7.2 IACC's review of the documentation submitted has been summarised in this letter with the specific intention of identifying where additional information and/or mitigation is required. IACC looks forward to receiving Horizon's response to the requests made and ultimately, to the preparation of a Statement of Common Ground.

Yn gywir / Yours sincerely



DYLAN J. WILLIAMS

Pennaeth Gwasanaeth – Rheoleiddio a Datblygu Economaidd
Head of Service - Regulation and Economic Development