

**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](#)

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**Please note, a number of emails will follow in relation to the LIR – we will confirm the final e-mail.**

Pnawn Da/ Good afternoon,

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

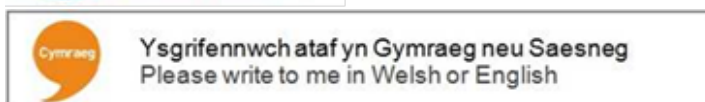
Bydd fersiwn Gymraeg yn cael ei ddarparu cyn gynted a phosib / *A Welsh version of the submission will be provided in due course.*

Cofion/ Regards,  
Manon

Swyddfa Rhaglen Ynys Ynni /  
Energy Island Programme Office  
01248 752435 / 2431  
[PMO@ynymon.gov.uk](mailto:PMO@ynymon.gov.uk)



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

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

***Sent by Email***

Dear Kieran,

**OFFICIAL SENSITIVE**

**Review of Horizon's DCO Submission (Logistics)**

**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 the Logistics Centre at Parc Cybi 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 The Logistics Centre at Parc Cybi will be operational during the construction period of the Wylfa Newydd project to control the flow of goods vehicles along the A5025. The Logistics Centre will include, an office/welfare building; security kiosk; driver instruction point; covered inspection bay; heavy goods vehicle scanner; HGV parking zones and staff parking bays.
- 2.2 During peak construction (of Wylfa Newydd) a maximum of 40 goods vehicles (light/medium

**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  
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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](mailto:DylanWilliams@ynysmon.gov.uk)  
Ein Cyf / Our Ref:  
Eich Cyf / Your Ref:

Dyddiad / Date: 27/09/2018

and HGVs) will be arriving and departing from the site each hour. Construction of the Logistics Centre will commence approximately one year after consent has been given and will last for approximately 15 months. A maximum of 50 construction workers will be on site at any given time, working shift patterns will be from 7am to 7pm Monday to Friday and 7am to 1pm on Saturdays. It is anticipated that the Logistics Centre will be operational for a period of 10 years (Power Station Construction period). Following this period it is proposed that the buildings on site will be removed however there would be no reinstatement of the site back to its former condition.

- 2.3 There will be an operation workforce of 14 staff on site which will be operational 24 hours a day seven days a week.

### **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, and given that the ministerial statement makes it clear that the Government considers that nuclear power stations due for deployment beyond 2025 should be considered under section 105 of the Act. As a consequence, the Local Development Plan, Supplementary Planning Guidance and Local Impact Report may carry more weight in the decision making process. The following paragraphs summarise the Council's current policy position with regard to this element of the DCO application
- 3.2 Strategic Policy PS9 (Wylfa Newydd and Related Development) specifies a list of criteria which require compliance when considering Wylfa Newydd and Related Development. In accordance with PS9 the policies included within the Plan along with any relevant Supplementary Planning Guidance should shape the approach of the development of Wylfa Newydd and associated development (criteria 1). All highways and transport proposal for the Wylfa Newydd projects should form part of an integrated traffic and transport strategy and show regard to PS 4 (Sustainable transport, development and accessibility) and any other relevant detailed policies within the Plan (criteria 3). Criteria 6 specifies that where proposals are for a temporary period both the site selection and the proposal detail should be informed by legacy uses, so that investment in elements such as infrastructure, buildings, ecological and landscape works bring long term benefits. Criteria 9 of PS 9 also outlines the requirement for opportunities to maximise employment, business and training opportunities for the local communities both in the short and longer term. In doing so the promoters procurement, employment, education, training and requirement strategies and delivery plans will require to be submitted to the Council as part of the wider application.
- 3.3 Furthermore, Strategic Policy PS 11 (Wylfa Newydd – Logistics Centres) is supportive of proposals for logistic centres which are to be located on safeguarded or allocated employment sites provided that the proposal includes sustainable transport proposals for staff including links to public transport as appropriate and that the siting of buildings and activities, means of access and egress and appropriate mechanisms are used to mitigate negative impacts of the proposed development on the amenity of the local communities.
- 3.4 The proposal lies within the Parc Cybi Primary safeguarded employment site. In accordance with Policy CYF 1 the site has been safeguarded for land uses which fall within the B1, B2, B8 and some suitable 'unique uses' (formerly known as sui generis) use class. The site is a Strategic Regional Site within the North Wales Regional Employment Land Strategy, meaning that it is seen as a site of regional importance with a critical role in achieving regional contribution to national economic development objectives and supporting key sector development.

- 3.5 The proposed use of the site falls within the unique uses (sui generis) use class. As specified within Strategic Policy PS 13 (Providing Opportunities for a flourishing economy) of the JLDP some unique uses may be suitable on safeguarded employment site.
- 3.6 Part of the Parc Cybi site has previously been developed as a lorry park, a use which is similar to the proposed development. Considering the time of occupation along with the legacy of having a site which is fully serviced for other suitable business to locate following the operational period of the logistic centre and not withstanding other issues i.e. visual/landscape/amenity issues (see below) it is considered that the principle of the development accords with the policies as contained within the JLDP.
- 3.7 The 'Wylfa Newydd' SPG expands on Policy PS 9 and Policy PS 11 stating that the Logistics Centre should be located in a suitable location for effective access to the main Wylfa Newydd site and that measures should be taken to ensure that there is a positive employment legacy use. The relevant policy within the Wylfa Newydd SPG is GP3 (Employment Sites, Logistics and Transport Uses). Further reference is made in GP3 to the need to ensure a beneficial legacy (including possibly the transhipment of goods through Holyhead Port or the remediation of the site for a suitable future use).
- 3.8 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's assessment records that archaeological remains within the site have already been excavated as part of the consented Parc Cybi development and concludes that no adverse direct effects are anticipated.
- 4.1.2 Horizon has identified two scheduled monuments, Ty-Mawr standing stone and Trefignath burial chamber which may be susceptible to adverse change arising from visibility of the proposed works or noise during their construction and operation. It concludes that there are two key contributing elements of the setting of these heritage assets; intervisibility between the two assets and their alignment with the winter solstice sunrise. Otherwise, their setting has been transformed by modern development and is dominated by the carriageway of the A55 North Wales Expressway and the industrial development beyond.
- 4.1.3 In the opinion of IACC the construction of the proposed development, as demonstrated by photomontage Viewpoints 1 and 2 (App. H10-5), would entirely preclude any intervisibility between these two heritage assets and would intervene in (though not preclude) views to the Winter Solstice sunrise from the Ty-Mawr standing stone. In that the winter solstice sunrise time would fall within the normal operating hours of this location, the influence of increased vehicle movements and associated lighting on the visibility and perceptual experience of the Solstice sunrise from Ty-Mawr should also be considered in any assessment.
- 4.1.4 IACC therefore concludes that the assessment of the effect of the construction of the Logistics Centre on heritage assets would be greater than that predicted. While it is not anticipated that these changes would give rise to substantial harm, any change is likely to give rise to harm to the significance of both assets that should be considered against the benefits of the proposed scheme and would constitute significant adverse effects. The much altered nature of the setting of these assets means that conservation of the

remaining contributing elements of setting should be prioritised, and cannot be taken uncritically as indicating a reduced sensitivity to change.

- 4.1.5 The proposed archaeological mitigation does not appear to accord with the statements in the ES that archaeological remains have been previously identified and recorded. Whilst recording of the present setting of the two scheduled monuments is welcomed, it would do little, if anything, to mitigate any harm. Similarly, whilst mitigation including design and selection of lighting to minimise light spill may present a minor reduction in effect, there does not appear to be any way in which the loss of intervisibility could be mitigated.
- 4.1.6 The Council considers measures such as provision of enhanced interpretation materials at the two scheduled monuments may present opportunities to compensate some of the effects of the scheme.

#### *Further Information Required*

- i. Consideration of the level of effect arising from change to the setting of the two assets considered against the benefits of the proposed scheme.

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

- i. A commitment within either the relevant sub-COCP, DCO requirement or other controlled document to the provision of enhanced interpretation prior to the commencement of development and with the prior agreement of IACC.

## **Natural Environment**

### **4.2 Ecology**

- 4.2.1 Horizon's assessment presents a database which includes European and nationally designated sites, together with habitat types within/adjacent to the Site which are common and widespread and considered to be of 'negligible value'. Horizon considers that these habitats are unlikely to support notable assemblages of lichens, fungi, bryophytes, terrestrial invertebrates and/or aquatic species and as such these groups are not considered further in the assessment.
- 4.2.2 Notable mammals (with the exception of bats, badger, otter and water vole) are also scoped-out of the assessment because of the limited extent of habitats that are suitable for them within the site. With regard to bats, badger, otter and water vole Horizon's baseline studies identified no presence of badger or otter. Whiskered/Brandt's bat and common pipistrelle have been recorded within 2km of the Site. Daubenton's bat and brown long-eared bat have also been recorded nearby. Woodland, scrub, hedgerow and grassland are suitable foraging habitats for bats. No trees within the Site have the potential to support roosting bats. Based on the Site being of limited value to foraging/commuting bats, bats are categorised as being of 'low value'. The retention of boundary habitats and limiting light spill on adjacent habitats during construction and operation is predicted to result in negligible effects on bats.
- 4.2.3 There are previous records of water vole at the attenuation pond in the north-east of the site and suitable habitat, the employment of a pre-construction survey and NRW consultation will allow drainage infrastructure to avoid water vole habitats. In the event of works in proximity to water vole burrows are unavoidable, effects on this species are

expected to be mitigated through vegetation clearance/displacement and destructive searches of burrows. A similar approach to mitigation, is proposed for reptiles.

- 4.2.4 Pollution prevention and dust control will be implemented in accordance with the CoCP. As far as practicable lighting spill into adjacent habitats during construction will also be minimised, including employing a control system which illuminates only areas where activities are occurring. Drainage would be designed to mitigate any significant effect on the attenuation pond.
- 4.2.5 The key areas of habitats likely to be used by bats and birds are the boundary features (hedgerows and dry stone walls) whilst the scrub, rock outcrops and grassland habitats support a low population of slow worm. The retention of areas of rock outcrop and hedgerow and the planting of species-rich grassland and new hedgerow would increase the amount of habitat of value to breeding birds, bats and reptiles. This would result in a minor positive effect on bats, reptiles and birds.
- 4.2.6 The Logistics Centre will be operational for ten years and will be lit at night. Measures will be in place to manage the risk of pollution, such as fuel leak/spill.
- 4.2.7 The retention of boundary features and avoiding light spill onto them is predicted to result in site lighting having a very minor detrimental effect on bats' use of these features. Site lighting is therefore predicted to have a negligible effect on bats. Noise from the operational site is also predicted to have a negligible effect on bats because bats that forage in proximity to the site are likely to be habituated to traffic noise and measures will be implemented to limit noise emissions from site traffic (e.g. engines on queuing vehicles will be turned off).
- 4.2.8 The management of surface water discharge and suspended solids runoff as detailed within the Wylfa Newydd CoCP and the Logistics Centre sub-CoCP and as described in the ES chapter will result in a negligible effect on water quality and negligible associated effects on aquatic/riparian receptors.
- 4.2.9 The effects of decommissioning the logistics centre on ecology would be mitigated in a similar way to the mitigation of construction effects and the site would not be returned to its pre-development state and instead would be made available for employment uses. Decommissioning will involve removal of buildings and leaving the hard standing in place. The buildings are predicted to have no resting, roosting or foraging potential for breeding birds and bats and decommissioning is likely to have negligible effects on ecological receptors.
- 4.2.10 Horizon concludes that there would be no significant effects on ecological.
- 4.2.11 Having reviewed the ecological assessment IACC is of the opinion that whilst there are limited omissions from the baseline information, these appear to be relatively minor issues and are unlikely to substantively skew the overall assessment conclusions. Based on the information provided it is likely that the Horizon's characterisation of the site and assessment of impacts is broadly correct.

*Further information required*

- 4.2.12 The Council considers that information is required in order for it to be satisfied that ecological features can be protected:

- i. Requiring confirmation that the design of the site's lighting scheme is informed as far as practicable by Bat Conservation Trust guidance.
- ii. Confirmation from NRW that it is satisfied that any pre-construction water vole surveys and potential water vole displacement and destructive searches of burrows can take place under an NRW licence. It is suggested that the approaches to be employed should be set out in detail and approved in principle by NRW in advance of consent being granted, information should include for use of buffers/fences to separate water vole habitats from construction activity, reinstatement and reconnection of water vole habitats, supervision of all works in proximity to ditches that support this species, as well as detailed, specific approaches to vegetation clearance, water vole displacement/exclusion and destructive searches. The mitigation should apply to all habitats that will be disturbed and are suitable for water vole.
- iii. It is unclear to the Council whether displacement of slow worm, through vegetation clearance and destructive searches (as opposed to capture and translocation), is an appropriate mitigation strategy at this site. It is unclear if there is adequate, suitable adjacent habitat into which slow worms will be displaced and where they will not become a small and increasingly isolated and vulnerable population. The mitigation method would also need to be adequate to protect juvenile slow worms, which are small and easily overlooked.
- iv. Significant adverse effects on herpetofauna appear to be unlikely, however based on the information provided in the ES it is unclear whether precautionary working practices to minimise the risk of harming common toads are planned/necessary/appropriate at this site. Any such measures, if required, would be set out in the sub-COCP or an individual Method Statement.
- v. Other measures should be considered for incorporation into the Code of Construction Practice, such as measures to displace any Section 7 mammals (e.g. hedgehog) prior to earthworks and/or remove common toads; speed limits to avoid harming wildlife; measures to avoid creating mammal refugia during construction; measures to control waste (operational and construction) to avoid increases in rat populations and associated effects on water voles; covering excavations or providing a means of escape for trapped mammals, such as ramps or gradually sloping edges/ends. Measures to avoid offenses relating to breeding birds should apply to built structures, including stone walls, as well as vegetation.

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

- i. Subject to the above confirmation, the Council may seek amendments to the relevant sub-COCP and/or a requirement for method statements in order to safeguard ecological receptors. IACC considers that this additional mitigation would be appropriately precautionary and in-keeping with Section 6 of the Environment (Wales) Act 2016. This places a duty on public authorities to 'seek to maintain and enhance biodiversity' so far as it is consistent with the proper exercise of their functions. In so doing, public authorities must also seek to 'promote the resilience of ecosystems'.

### **4.3 Surface and Groundwater**

- 4.3.1 A review of the documentation submitted with regard to Parc Cybi has been undertaken. The Council notes that situated within Flood Zone 1 is minimal with surface water limited to off-site ponds plus two minor depressions. The present condition of the site is however

noted as being marshy grassland which suggests high groundwater and confirmation is required that this would not pose a SUDs design issue.

- 4.3.2 With regard to the proposed SUDs system it is noted that this will be hard-engineered - pipes and below ground storage, limiting opportunities for bio-processing/treatment. It is recognised, however that additional off-site SuDS already exist - an open-air attenuation basin, to which partially attenuated site runoff is passed.
- 4.3.4 The proposal to provide a 20% climate change allowance in the SUDs design is considered appropriate for the temporary lifetime of the facility but this would need to be upgraded if the use is to remain permanent. Given the potential legacy use for the site, the IACC would request that this allowance in the SUDs design to be increased to allow for greater capacity and to prevent future drainage works being required on the site.
- 4.3.5 With regard to proposed drainage rates paragraph 4.3.2 of the Flood Consequence Assessment references an equivalent discharge rate of 3671l/s to the pond which appears extraordinarily high and it is not clear how this has been derived from the original Parc Cybi Drainage Strategy within which Plot 10 was a larger area than the current site. The Council would also wish clarification as to whether the off-site pond to the west is to provide further attenuation prior to discharge to a watercourse.
- 4.3.6 With regard to drainage, IACC seeks confirmation that the capacity of the culverts which convey site/catchment drainage northwards under the A55 have been assessed.

*Further information required*

- 4.3.7 The capacity of the culverts under the A55 is sought to provide clarification that sufficient on-site, and off-site (Parc Cybi) SuDS are provided to prevent deterioration of off-site water quality, whether or not the drainage ultimate enters Holyhead Bay.
- i. Confirm basis of attenuation control/and rate - document is not clear on what the actual rate is for the proposed development site. The 367l/s rate is very large for a site of this size and does not appear to be correct, clarification required.

*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 Parc Cybi is within the Anglesey Area of Outstanding Natural Beauty (AONB) but not within or near any Special Landscape Areas (SLAs). Therefore, the Council is concerned to ensure that the likely direct and indirect adverse effects of the construction, operational and decommissioning phases on the features, special qualities and purposes of the AONB and on the existing landscape character of the site and local area (the local landscape character) are mitigated wherever possible.
- 4.4.2 Horizon identifies likely 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, which would result in a moderate, short-term and significant adverse effect on this part of the AONB but a negligible adverse effect on the AONB as a whole.

- 4.4.3 At operation the presence of the large numbers of HGVs and hardstanding, internal roads, welfare/security building, lighting columns and site security boundary fencing would completely change the character of the site landscape, resulting in a moderate, medium-term and significant adverse effect on the landscape character of the site. The Logistics Centre would also be a noticeable additional feature which would contrast with the current landscape character in the surrounding area (as illustrated in Viewpoints 1 and 2), 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. As with the construction phase this would result in a moderate, medium-term and significant adverse effect on this part of the AONB but a negligible adverse effect on the AONB as a whole.
- 4.4.4 The Council concurs with Horizon's assessment that there would be no significant adverse effects arising from the decommissioning phase.
- 4.4.5 With regard to potential effects upon landscape elements the submitted documentation provides no assessment of the likely direct effects (adverse and beneficial) of the proposed Logistics Centre on the existing landscape and amenity value of the landscape fabric of the site. IACC considers that this approach is contrary to EN-1, paragraph 5.9.6 which requires applicants to assess the effects of construction and operation on landscape components as well as landscape character. The Council is particularly keen to retain as much as possible of the small woodland in the western corner of the site (both as a landscape element in its own right and in its capacity to screen inward views (see comments under Visual below)).

*Further information required*

- 4.4.6 The following additional information and mitigation should be submitted:
- i. An assessment of the landscape and amenity value of the existing landscape elements on the site.
  - ii. Modification to the design in order to retain or as much as possible of the existing small woodland copse in the western corner of the site (see also Visual comments below).
  - iii. The provision of an outline Landscape reinstatement scheme with a DCO requirement to require the submission of a detailed scheme within an agreed period of time prior to the end of the operational period. IACC would wish to make sure any planted and grassland areas disturbed by the decommissioning works are reinstated.
  - iv. Agreement to the source 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 2 years prior to the plants and seeds being needed on-site.
  - v. Further information is sought with regard to the cut-and-fill necessary to achieve the levels required on the site, in particular, whether there is sufficient quantity/quality of topsoil and subsoil on the site to achieve the planting and seeding proposed and the quantity/quality of materials that would need to be imported and/or exported from the site.

- vi. Environmental Lighting Impact Assessment – The submitted drawings provide information on the location and height of columns and information is also provided within regard to the proposed light levels. The Council would wish to receive confirmation via an impact assessment that the levels of light will be limited on nearby waterbodies, watercourses, retained hedgerow and boundary habitats (which are also landscape elements) and on nearby sensitive visual receptors (see also comments under Ecology).
- vii. 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 proposed Parc Cybi Logistics Centre on the existing landscape fabric (elements) of the site should be provided.

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

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

- i. Prior to the commencement of development the preparation and submission of 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 Parc Cybi Logistics Centre and will inform the landscape scheme and landscape reinstatement of the site.
- ii. Notwithstanding the submitted drawings and information, a detailed lighting scheme informed by a lighting impact assessment which demonstrates the incorporation of mitigation measures necessary to minimise the impacts on sensitive ecological, landscape and visual receptors.
- iii. Notwithstanding the submitted drawings, IACC will require further information on the choice of surface colours, materials and finishes of the proposed buildings and structures which should be chosen with a view to being appropriate for the site's location in the Anglesey AONB.
- iv. In addition to the information contained within the Wylfa Newydd COCP, the Council would require the submission of separate method statements for the control of each invasive non-native species. These statements should be submitted to and approved by IACC prior to commencement of development.
- v. A scheme for the cut-and-fill remodelling of the site, so that the appropriate site-derived topsoil and subsoil are used in the planting and amenity grassland areas (topsoil) and species-rich grassland areas (subsoil) (see further information comment above).
- vi. A detailed landscape scheme for the site to include: measures to protect the existing habitats and landscape features to be retained and enhanced on the site and the sightline between the existing heritage assets; the plant species for the hedgerow, shrub and tree planting and species mix for the grassland areas, local provenance, plant sizes, numbers, plant spacing/densities; and a specification for the soil preparation, planting, seeding and 10 year maintenance operations to be undertaken.
- vii. A detailed landscape reinstatement scheme for the site to make good any areas disturbed by the decommissioning works, to include: plant species for any hedgerow, shrub and tree planting and grassland areas, local provenance, plant sizes, numbers,

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plant spacing/densities and a specification for the re-grading, soil preparation, planting, seeding and 5 year maintenance operations to be undertaken (see further information comment above).

#### **4.5 Visual**

4.5.1 IACC's review of the detailed viewpoint assessments in Appendix and main Landscape and Visual chapter concludes the Horizon visual assessments are generally accurate, but for a small proportion of visual receptor groups may over-assess the visual role of the construction and operation of the Logistics Centre. The Council has not identified any additional visual receptor groups nor has it identified any examples where the Horizon visual assessments have under-assessed the magnitude of change and hence the significance of residual effects.

4.5.2 The construction, operation and initial decommissioning of the Parc Cybi Logistics Centre would generate significant adverse visual effects for a high proportion of the moderate number of visual receptors who have local views (under 1km) as defined in Table H10-1 in the H10 Landscape and Visual chapter. It is agreed that significant adverse effects will be sustained by visitors to the two nearby scheduled monuments, community receptors in the closest parts of Kingsland (some properties around Cweryd Villas) and Trearddur and recreational and transient receptors using the closest sections of two cycle ways and the Service Road.

4.5.3 The Council has reviewed the list of additional mitigations proposed by Horizon and concludes with Horizon the adoption of the limited range of measures, whilst beneficial, would not change the visual assessments for any group of visual receptors.

4.5.4 IACC is of the view that the potential for further on-site mitigation is limited. Clarification is however sought firstly that the 2.4m high paladin fencing has a neutral colour finish to minimise any potential visual contrast with the elements within and beyond the site against which it will be viewed; and verification that the lighting columns in the central part of the site need to be 12m high. Their height increases their visual prominence in views from the immediate surroundings of the site e.g. Viewpoint 1 at Trefignath Burial Chamber.

4.5.5 The footprint and the functional requirements of the Logistics Centre result in a minimal amount of potential for additional on-site mitigation planting whilst the ten years long operation period limits the potential for successful screen planting. Screening would benefit from retention of the limited amount of existing on-site trees, scrub and hedgerow however the construction of the Logistics Centre will necessitate the removal of a proportion of the woodland copse sited in the western corner of the site and the smaller area of scrub in the southern corner of the site. The Council would therefore wish to see the detail design of the Logistics Centre reviewed to minimise the vegetation losses in these two areas. Even the additional retention of a small number of shrubs or trees would be beneficial, particularly for visitors to the two scheduled monuments.

4.5.6 There are in addition two possible on-site locations where further enhanced planting would provide additional long-term screening and filtering in the views available to some groups of visual receptors. The proposed new hedgerow along the north-western site boundary should include an increased number of tree species, a high proportion of which should be larger specimens (such as heavy or extra heavy standards) to provide instant filtering of views. Filtering provided by the trees would be beneficial for visual receptors located to the north-west, including visitors to the Ty Mawr Standing Stone scheduled monument. In addition if the irregular shaped area to the north west of the hedgerow is

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 the Council in Welsh or English. You will receive the same standard of service in both languages.

available it should be used to provide an extension of the adjacent woodland copse, providing visual, landscape and ecological compensation for the partial removal of the woodland copse.

- 4.5.7 The second potential further on-site mitigation and enhancement planting proposal relates to the site's south-eastern boundary which fronts onto the Parc Cybi Service Road (and is traversed by the Lon Trefignath Cycle path). DCO drawing WN0902-HZDCO-ADV-DRG-00016 (General Arrangement and Finished levels) shows only grassland is proposed for the frontage of the Logistics Centre. It may be necessary to avoid tree and shrub planting to allow for the mandatory lines of sight to be provided for drivers at the site entrance however, within these restrictions consideration should be given to providing some limited planting in the form of small groups of trees and shrubs alongside the retained stone wall using a proportion of larger specimens for instant visual effect. As such planting becomes established it would break up views of the parked lorries and built elements in close distance moving views from the Lon Trefignath and Parc Cybi cycle paths and more distant community receptor views from the north-east of Trearddur. The further proposed on-site mitigation planting would also have the long-term benefits of providing in-situ established screening for the subsequent development on the site. The detailed design of this planting would also need to consider the need to maintain a line of site between the two scheduled monuments.
- 4.5.8 Horizon have not proposed any off-site planting at Parc Cybi which is in accordance with their overall approach, nevertheless the IACC has identified limited potential further off-site mitigation planting. Such planting would be adjacent to the site and would have the objective of replicating the visual (and landscape and ecological) role of the areas of woodland copse and scrub planting in the site that will be lost during the construction period. Hence one area of the off-site planting would be located within the short distance between the southern part of the site and the Trefignath Burial Chamber. The second area would be associated with the remnant of the woodland and scrub copse at the western corner of the site. The remnant copse could be extended to the west, south-west and north, potentially linking up with woodland planting in the part of the site beyond the north-west boundary hedgerow. The off-site planting proposals would provide beneficial partial screening and filtering in views available to visual receptors located to the south, south-east, west and north-west including visitors to the two scheduled monuments. As with some of the further additional on-site mitigation planting proposals identified, this off-site planting would need to be designed to maintain the line of sight between the scheduled monuments.
- 4.5.9 A final potential further off-site mitigation planting option that has been identified in the wider Parc Cybi area. This relates to the provision of structural planting for the consented development that will be provided in the Parc in the medium to long-term. Some structural planting has already been provided close to some sections of the Parc Cybi Service Road. There is potential for further planting to be implemented that would provide some screening for visual receptors for the late operation period and would provide increased screening for the decommissioned Logistics Centre as well as providing an enhanced landscape structure for the consented future development across the wider Parc Cybi. There is also potential for compensation measures across Parc Cybi to include for the reinforcement and restoration of the stone walls that contribute strongly to the field boundary pattern. This reinforcement and restoration should be designed to combine the need to reinforce the time depth of the remnant field boundary pattern with acknowledgement that suitable size areas must be provided to host the permitted B1, B2 and B8 developments as they are implemented.

#### *Further information required*

4.5.10 In summary, the Council would wish the following:

- i. The ability to agree the colouring and design of the proposed boundary fence.
- ii. A review by Horizon of the need or otherwise for 12m high lighting columns in the central part of the site.
- iii. Consideration of ways in which the proposed development could be amended to retain more of the existing vegetation on site.

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

- i. The ability for IACC to agree the colouring and design of the proposed boundary fence.
- ii. Either through a revised GA drawing or via a DCO requirement, the inclusion of additional planting within the site as discussed above and consideration of recommendations for off-site planting both close to the site and within the wider Parc.

### **4.6 Socio-economic**

- 4.6.1 The Council recognises that there are likely to be positive impacts arising from construction of the Logistics Centre on job creation and the potential for training and apprenticeship opportunities although in terms of direct jobs created as part of this development, they are likely to be limited in number at 50 construction and 14 operational jobs. The works proposed do however present the opportunity to use local contractors and develop local supply chains.
- 4.6.2 The Council notes that there may be a 'not significant' impact on local business arising from the increased traffic flow associated with the use of the site and requests that a commitment is made by Horizon to provide signage to inform customers of local businesses that they are still open during the construction works and provide alternative access route if feasible.
- 4.6.3 IACC would wish to see further consideration with regard to improving linkages between the Parc Cybi site and the Port of Holyhead to complement and support the delivery of the Enterprise Zone site and enhance connectivity with the Port as a key international gateway.

#### *Further information required*

- i. Agreement in principle to the inclusion of a DCO requirement or amendment to the Code of Operational Practice to include for the provision of a signage strategy to existing local businesses.

### **4.7 Noise and Air Quality**

- 4.7.1 IACC's Public Protection team notes that the sub-CoCP is categorised into various aspects with regards to mitigation measures for overarching topics that include the Community Liaison Group, general site management strategy, air quality management strategy, noise and vibration management strategy, waste and materials management strategy including soils and land contamination and the water management strategy.

- 4.7.2 With regard to the air quality management strategy Horizon have stated in the Main Power Station Site and Marine Works sub-CoCP's that the amber and red trigger levels for dust deposition at ecological receptors will be 150mg/m<sup>2</sup>/day and 200 mg/m<sup>2</sup>/day. The latter position is also considered applicable for human receptors and it should be noted that such threshold levels have yet to be agreed with HNP by IACC at this time.
- 4.7.3 Horizon makes one reference to undertaking continuous monitoring of particulates (total particulates, PM<sub>10</sub>) using an Osiris optical particulate analyser for the logistics site. Again, threshold levels have yet to be agreed with IoACC.
- 4.7.4 The noise and vibration management strategy contains reference to the Noise and Vibration control measures which include for the monitoring of location representative of noise sensitive receptors to ensure that during construction, levels will remain below those permitted under the intended section 61 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 the Council.
- 4.7.5 The programme for monitoring operational noise at the Logistics Centre 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.

*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 to be agreed with IACC. This is to include for the agreement of thresholds.

#### **4.8 Traffic and transport**

- 4.8.1 The Council will require assurance that it has the ability to enforce the Horizon commitment that the number of vehicles movements (LGV/MGH/HGV) are restricted to a maximum of 40 movements per hour per direction and are released at regular intervals to avoid 'convoys' and sensitive times of the day (e.g. school run). The IACC can confirm that it agrees with the proposed approach to use a Distribution Management Asset Tracking System. This is essential to monitor, manage and control movements to and from the Logistics Centre.
- 4.8.2 The Policy review presented earlier within this letter referenced Strategic Policy PS 11 (Wylfa Newydd – Logistics Centres) which is supportive of proposals for logistic centres providing amongst other criteria, that they include for sustainable transport proposals for staff which should include links to public transport as appropriate. Figures C2-2 and C2-3 ES Volume C Road traffic related effects illustrate existing bus and cycle routes and demonstrate that neither pass close by or to the site. The Council would therefore wish to receive from Horizon a commitment to secure public transport provision to the site to serve the workers during the operational phase.

#### **4.9 Legacy**

In its consideration of topic specific issues above, the Council has touched upon the issue of legacy. This has been in relation to ensuring that site drainage is built with sufficient capacity to deal with climate change impacts beyond 20 years and that the landscaping undertaken as part of this development is retained. Chapter 1.5.9 of Volume 6.8.1 lists the following elements for removal:

- i. removal of office/welfare building;
- ii. removal of inspection bay covering;
- iii. removal of security scanner; and
- iv. removal of security kiosks.

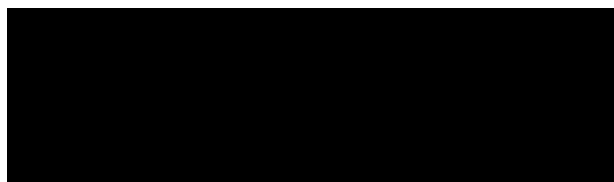
4.9.1 IACC can confirm that it accepts the removal of these structures and equipment but for the benefit of doubt it would expect, in addition to the landscaping, that the hard surfacing, fencing, lighting and services are retained. The IACC would expect Horizon to maintain the site in its decommissioned status for a period of five years or until such time as the site is occupied or sold to a third party whichever is the sooner.

#### **5.0 Conclusion**

5.1 The Council notes that the provision of the logistics centre at Parc Cybi represents a key element of Horizon's proposals to mitigation the traffic and transport effects arising from the construction of Wylfa Newydd. To achieve this however it is essential that they are delivered quickly and ahead of the more intensive construction activities at the main site. The submitted phasing strategy shows that the facility will be open by the end of construction year 2 and IACC would request that Horizon agree to a DCO requirement or other means to ensure that this is achieved and that as such, construction activities generating significant amounts of traffic are not allowed to occur without the centre being in use, i.e. at the start of Q1, year 3.

5.2 Whilst the centre represents a relatively small element of the overall project, it is still of a size and scale that can give rise to significant effects in its own right. 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 may be required. The Council looks forward to receiving Horizon's response to the requests made and ultimately, to the preparation of the Statement of Common Ground.

**Yn gywir / Yours sincerely**



**DYLAN J. WILLIAMS**

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