

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.*

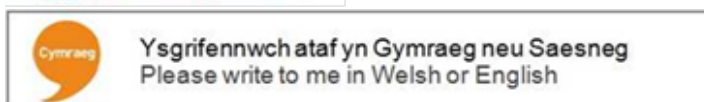
Bydd fersiwn Gymraeg yn cael ei ddarparu cyn gynted a phosib / *A Welsh version of the submission will be provided in due course.*

Cofion/ Regards,
Manon

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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.

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

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Sent by Email

Dear Kieran,

OFFICIAL SENSITIVE

Review of Horizon's DCO Submission (Off Site Power Station Facilities)

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 Off Site Power Station Facilities 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 proposal involves the development of a former bus depot site (currently used as a garage) for off-site power station facilities associated with the Wylfa Newydd development. The off-site facilities comprises of Alternative Emergency Control Centre (AECC), Environmental Survey Laboratory (ESL) and a Mobile Emergency Equipment Garage (MEEG), along with other ancillary development on the site.

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Ein Cyf / Our Ref:
Eich Cyf / Your Ref:

Dyddiad / Date: 27/09/2018

- 2.2 A large portion of the development will be located on previously developed land with some of the development on land which is considered greenfield. Within the Joint Local Development Plan the site is considered to be open countryside because it and adjoining properties are not located within a development boundary as defined by Policy PCYFF 1. Directly opposite the proposed site lies the Anglesey Coast Area of Outstanding Natural Beauty, along with the Garreglwyd Registered Historic Parks and Gardens.
- 2.3 Horizon's documentation states that construction would begin in the third year following grant of development consent, and last for approximately two years. The Off-Site Power Station Facilities would be operated until the decommissioning of the Power Station. Construction would be timed to begin following the completion of the A5025 highway works.

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, 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 application.
- 3.2 Planning Policy Wales (2016) along with TAN23 (2014) encourages economic and employment growth alongside social and environmental consideration within the context of sustainable development. However where a proposed development would cause unacceptable environmental or social harm, demand should be steered to an alternative location, unless the harm is outweighed by the additional benefit of development at the original site under consideration.
- 3.3 Policy PS 9 (criterion 1) requires proposals for development related to the Wylfa Newydd project to consider relevant policies in the JLDP and any relevant supplementary planning guidance. Reference should be made to policy CYF 4 (New large single user industrial or business enterprise on sites not safeguarded or allocated for employment purposes). The policy allows for large single industrial or business uses on sites not allocated for employment or business units provided that the proposal conforms to the criteria as listed within the policy. The first criteria within the policy specifies the locational requirement for the proposal stating that the proposal must be located on a site located within or adjoining the development boundary of the sub regional centre, urban or local centre. The remaining criteria within policy CYF4 specifies the need for the proposal to conform to the tests as outlined in PPW and TAN23. Further where appropriate the site should be located within an existing building or a previously developed land and the scale, type and design of the development should be appropriate for the site and the locality or is compatible with the existing design.
- 3.4 The proposed development is located on a site classified as open countryside within the JLDP and IACC considers that the proposal does not therefore conform to the principles as outlined in policy CYF4. Further Policy PCYFF 1 (Development Boundaries) stipulates that development outside the development boundaries should be resisted unless it is in accordance with specific policies within the Plan or national planning policies or that the proposal demonstrates that its location in the countryside is essential.
- 3.5 The Wylfa Newydd SPG (policy GP31) supports the principle of locating the Off-Site Facilities along the A5025 corridor provided that the proposal complies with the policies

contained within the JLDP and the relocation of the existing business on site. The Council notes that no details have been included within the submitted documents relating to the relocation of the existing business and the availability of a suitable site to accommodate the business.

- 3.6 The documentation submitted with the application stipulates that there are specific locational requirements with regard to the proposed use requiring a location upwind of any prevailing potential airborne hazards and between 1.5km - 7.5km from the main site. The Site Selection Report (Volume 1 and 4) details the selection process which has resulted in the Llanfaethlu site being the preferred option.
- 3.7 Accepting that the proposal does not conform with Policy CYF4 the Council would agree that an alternative (more appropriate site) which would comply with the principle of Policy CYF4 could be found within the search area. The Council also recognises the fact that the vast majority of the site is previously developed land and notes the site's accessibility to the A5025. For these reasons the Council is content with the principle of this development at the site subject to the following site specific issues.

4.0 Summary of Main Issues

4.1 Historic Environment

- 4.1.1 IACC has reviewed the submitted assessment of effects upon the historic environment contained within ES Volume E. Whilst it has some concerns over the specific valuations of archaeological remains it recognises that because the site is predominantly brownfield the potential survival of archaeological remains is likely to be limited. The Council is of the opinion that potential effects could be mitigated through an agreed scheme of archaeological investigation.
- 4.1.2 Horizon notes that there are relatively few designated heritage assets within the study area. Whilst the Council considers it appropriate that the visibility of the proposed development from these assets should be considered it does agree that the proposed development would present limited change in their settings with no significant adverse effects to be recorded.
- 4.1.3 Given the limited scale and containment of the proposed development in an area of existing industrial/transport use the Council is also in agreement that the proposal would present limited change to historic landscape character and no significant adverse effects would arise.

Further Information Required

- i. See comments under landscape and visual with regard to additional screening.

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

- i. Mitigation of disturbance of archaeological remains could be adequately achieved by the implementation of an agreed scheme of archaeological investigation which should be the subject of a specific requirement rather than reliant upon reference within the sub-CoCP.

Natural Environment

4.2 Ecology

4.2.1 IACC's review of the ecological assessment contained within the environmental statement and supported by appendices is that there are limited omissions from the baseline information. However, in places the EIA conclusions are considered to be vague and not clearly linked to the underpinning survey data/reports. This limits the robustness of the assessment in places although in the view of the Council these issues are unlikely to substantively skew the overall conclusions regarding the significance of effects. The following comments are made.

GCN:

4.2.2 The baseline surveys are based upon presence/absence rather than an assessment of population size class. Data collected in 2014 could be considered out of date whilst the Council is not convinced that the A5025 would act as a complete barrier to GCN dispersal between Pond 21 and the site.

Bats:

4.2.3 No activity surveys have been undertaken with baseline assessments based on surveys undertaken on nearby land in 2014. These are out of date and inconsistent with survey guidance. Whilst roost surveys were undertaken in 2016 the buildings with the highest (moderate) bat potential (M3 and 'old stone farm buildings') have not been surveyed. Document 6.5.17, an Appendix to Volume E, suggests that building M3 lies outside the application site yet the accompanying figure shows it within. The ES chapter notes that the building was not surveyed in 2016 as at that point in time it lay outside of the proposed site boundary. The sub-CoCP references the intention to undertake pre-construction surveys of the building and to apply for a licence should this be necessary prior to demolition.

4.2.4 The Council is of the opinion that the change in site boundary over time does not represent suitable justification for not undertaking a bat survey. The Council considers that the process of EIA should be to present sufficient information to the decision-maker to enable it to conclude the potential for significant effects. The Council would strongly advise that activity surveys at building M3 are undertaken as soon as possible and reported as part of the DCO process.

Otter and Water vole:

4.2.5 The Council considers that the categorisation of the water vole population as 'low value' requires further explanation although it recognises that it is unlikely that there is a mechanism by which the development could have a significant effect upon water voles.

4.2.6 IACC notes that water voles have been identified in the East Drain which extends to the south east of the site and baseline data would afford more confidence in the assessment conclusion.

Reptiles

4.2.7 The Council notes the scoping out of reptiles yet there is reference in the Phase 1 habitat survey to the potential presence for reptiles. The submitted sub-CoCP currently does

not reference reptiles and the Council would request that Horizon clarify the measures it will take at the site to ensure compliance with legislation.

Terrestrial and freshwater habitat

- 4.2.8 There is limited justification of the conclusion that the freshwater habitat in the area is of 'low value'. However it is acknowledged that the scope for significant effects is low. With regard to terrestrial habitat the assessment does not acknowledge assess or scope-out effects upon the area of semi-improved grassland.

EIA Approach

- 4.2.9 The EIA conclusions are in places not well-linked to the underpinning baseline survey data/report. Furthermore in some cases the justification that is presented is misleading, for example it would appear that no macrophyte, macroinvertebrate or fish surveys have been carried out on the drains/ditches in proximity to the site, although these surveys are referenced by way of justification of a conclusion that these receptors are of negligible value.

Further information required

- i. Confirmation that the site's lighting scheme is informed as far as practicable by Bat Conservation Trust guidance.
- ii. 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 great crested newts/reptiles are planned/necessary/appropriate at this site. Any such measures, if required, would be set out in a Method Statement.
- iii. Horizon should give full consideration to the undertaking of roost surveys to Building M3 and potentially the 'old stone farm buildings' prior to examination.
- iv. There remain uncertainties regarding the scale of habitat loss/disturbance along watercourses that may support water voles, with associated uncertainty regarding the mitigation approaches to be employed. The approach to mitigating the effects of drainage/outfall construction on otter/water vole is not detailed in the ES and remains subject to further survey work and agreement with NRW. This information should also be provided to the Council
- 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); 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 potential associated effects on water vole. Measures to avoid offences relating to breeding birds should apply to built structures, as well as vegetation.

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 development at the site. The revised document should include for the preparation of method statements which should be submitted to and approved by IACC.

4.3 Surface and Groundwater

- 4.3.1 The Council notes that the Flood Consequence Assessment identifies risks with a surface water flowpath and with the depth/velocity of flood water on the A5025 at the site entrance, and through the site. It recognises that Horizon has a proposed design that would intercept any flood water and that this would be confirmed via detailed design with the future development site potentially experiencing flood depths of 0.022m in the 0.01% event.
- 4.3.2 IACC would note that the mitigation measures proposed would be reliant upon regular maintenance and that when undertaking the detailed design that the pipes draining the 'cattle grid' feature for intercepting A5025 surface water are of an appropriate scale/capacity. Clarity is also sought as to whether the swale which would be connected to the feature would have pollution control valves to minimise the risk of it being a pollution pathway between the A5025 and the Afon Llanhyddlad.

Further information required

- i. Clarification with regard to detailed design which should be provided to the Council prior to commencement of development.

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

- i. IACC may require amendment to DCO requirement OPSF3 to include for reference to the drainage details in addition to the buildings.

4.4 Landscape

- 4.4.1 IACC notes that Horizon has identified some minor and not significant adverse effects upon the landscape character of the site and surrounding area, including a localised part of the AONB during the construction phase and the Council concurs with this conclusion. Opportunities to mitigate further the residual impacts of the development would include for the retention of more of the existing mature boundary vegetation as they may reduce these short-term effects further.
- 4.4.2 Proposed new planting at the start of the operational phase would provide some long-term beneficial effects on local landscape character. However IACC is of the view that the proposed buildings and in particular the MEEG/AECC due to its scale, height and mass would be very noticeable in contrast with the current landscape character in both the AONB (Viewpoint 7) and in the local landscape (Viewpoint 8). Whilst the proposed new planting would progressively ameliorate these resulting adverse effects on landscape character they would be less successful in ameliorating effects on the AONB.
- 4.4.3 The Council would wish to see additional screen planting to be placed along the western and northern boundaries of the site whilst it would wish to agree final details including samples of the roofing and walling materials proposed for the buildings with consideration given to ways in which the appearance of the MEEG/AECC could be broken up visually.
- 4.4.4 It is noted that the assessment does not include for the identification or consideration of effects upon the landscape elements of the site.

Further information required

The following additional information and mitigation should be submitted:

- i. A survey of the existing landscape elements of the site that identifies the species, age, condition/quality and contribution to landscape character and visual amenity.
- ii. Consideration should be given how the appearance of the MEEG/AECC could be mitigated given that it dominates the site when viewed from the AONB.
- iii. A revised outline landscape scheme should be submitted that includes: retaining more of the existing mature vegetation on and around the boundaries of the site; continuing the low stone wall along the northern and western boundaries and using planting to soften the site boundary alongside the A5025; a new native hedgerow with hedgerow trees along the northern boundary of the site; planting outside the security fence to be undertaken in advance of the commencement of construction to enable the planting to start establishing and to begin to soften the boundary fence once this is installed; a schedule of typical plant species mixes for the hedgerow, shrub and tree planting and grassland areas, together with approximate plant numbers and an outline of the soil preparation, planting, seeding and maintenance operations to be undertaken; the species mixes and an outline of the soiling, seeding and maintenance operations to be undertaken in the overspill parking area.
- iv. Details on the sources of plants to be used in the landscape and reinstatement schemes, including provenance.
- v. 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 Off-Site Power Station Facilities on the existing landscape fabric (elements) of the site should be provided.
- vi. 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. A detailed lighting scheme incorporating the mitigation measures necessary to minimise the impacts of the lighting on sensitive ecological, landscape and visual receptors, consistent with Bat Conservation Trust Guidance (see ecological comments above).
- ii. A DCO requirement that requires Horizon to submit details illustrating the elevational treatment to the buildings, notwithstanding those submitted to date. To include for the prior agreement by the Council of materials and for the submission of material samples for approval.

- iii. A requirement for the submission and approval of a detailed landscape scheme for the site to include: plans showing existing vegetation to be retained and new planting; a schedule of plant species mixes for the hedgerow, shrub and tree planting and grassland areas, together with the plant sizes, numbers, plant spacing/densities, seeding rates, local provenance and specification for the soil preparation, planting, seeding and maintenance operations to be undertaken.
- iv. An outline landscape reinstatement scheme for the site to include: plant species for the hedgerow, shrub and tree planting and grassland areas, plant sizes, numbers, plant spacing/densities, seeding rates, local provenance and a specification for the re-grading, soil preparation, planting, seeding and 10 year maintenance operations to be undertaken with a requirement to submit details prior to decommissioning.
- v. Provision of a Community Environmental Fund for the duration of the Construction Phase plus 5 years to fund off-site screen planting – eg in nearby residents' gardens and on the opposite side of the carriageway.

4.5 Visual

- 4.5.1 The Council notes that the assessment of visual impacts is based primarily upon the eight representative viewpoints (and two photomontages) provided for the recreational, community, commercial and transient visual receptor groups in the ZTV in the Off-Site Power Station Facilities study area.
- 4.5.2 Having reviewed the assessment the Council has concluded that it agrees with the construction, operation and decommissioning effects identified for Viewpoints 1, 3, 5 and 6 but disagrees with some aspects of the remainder. Essentially it is of the opinion that a small proportion of visual receptor groups may be under-assessed and it concludes that the construction, operation and decommissioning of the Off-Site Power Station Facilities would generate significant adverse visual effects for a relatively small number of community and recreational receptors.
- 4.5.3 The community receptors are a proportion of the CR2 group who are the residents of the group of properties located close to the A5025 to the north of Llanfaethlu. The proximity of the Off-Site Power Station Facilities to some of these properties when only limited intervening screening is available will result in residents in a small number of these properties sustaining significant adverse effects. A contributory factor is that the on-site landscape planting is almost entirely located in the southern part of the site, consequently it will not provide screening for residents in properties to the north.
- 4.5.4 The second group of community receptors who would be likely to sustain significant adverse effects are those at the recently opened Llanfaethlu Primary School (S1). Their proximity combined with the openness of their slightly elevated views are the primary factors. Views should become more heavily screened as the landscape planting on the northern side of the Primary School approaches maturity i.e. by Year 15.
- 4.5.5 Significant effects upon recreational receptors using PRoWs are assessed as being restricted to the small number of PRoWs located to the south (FP1) and the west (FP2). The latter PRoWs are within the AONB. FP1 recreational receptors will only sustain significant adverse effects until the planting proposed for the southern and south-eastern site boundaries becomes established and provides some screening. Hence visual effects assessed as becoming not significant by Year 15. Recreational receptors to the west

(FP2) will not sustain screening benefits from the establishment of the proposed on-site planting hence the Council concludes that significant adverse effects will continue throughout the operation period unless limited off-site planting is provided that will establish to filter receptors' views.

Further information required

4.5.6 The proposed ESL building's location on the western edge of the site ensures that its long elevation is directly visible from the A5025 and faces the AONB and recreational receptors using FP2 PRoWs. It will also be obliquely visible in views available to community receptors at Llanfaethlu Primary School and in some properties within CR2. This relatively high level of visibility should be reflected in the elevation's appearance hence it is important that, as shown in Figure 36 in the DAS, this elevation of the ESL building is surfaced entirely in Penmon limestone as opposed to the metal insulated cladding proposed for use on a proportion of the other outer walls of the ESL. The Council would wish to see an amended elevational treatment for this building and for further consideration to be given to the proposed MEEG/AECC (see Landscape comments above).

In summary, the Council would also wish the following:

- i. That 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 site and should also be planted early.
- ii. Further revisions to the landscape scheme (see Landscape comments also) to include a small number of native hedgerow trees in the two lengths of internal hedgerow located in the central part of the site. Their presence would mirror the presence of garden trees in the curtilage of nearby residential properties.
- iii. Off-site mitigation planting would be beneficial on the field-side of the stone-wall that runs alongside the western verge of the A5025. Visual benefits would result from the establishment of a small number of individual hedgerow trees along the length of field boundary stone wall opposite the ESL building and increasing the number of isolated hedgerow trees further south. The latter would potentially provide additional partial screening in northern views from Llanfaethlu Primary School.
- iv. Compensation measures in the form of improvements to the local PRoW network – signage, surfacing, access gates/stiles etc and as appropriate consistent with IACC's wider recreation and access strategies as set out in the ROWIP 2008-2018 and the replacement ROWIP once approved as well as the AONB Management Plan.

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

- v. Subject to the receipt of further information listed above an amended landscaping plan, or a DCO requirement requiring Horizon to submit a revised

and more detailed landscaping plan and planting schedule identifying additional areas for planting on and off-site consistent with the Council's request under 'Landscape' above.

- vi. If elevational treatment remain to be agreed prior to the close of examination, that a DCO requirement is provided which requires Horizon to submit details illustrating the elevational treatment to the buildings, notwithstanding those submitted to date. The requirement should include for the prior agreement by the Council to the materials to be used and for the submission of material samples for approval (see Landscape requirements above).

4.6 Socio-economics

- 4.6.1 IACC notes that Horizon have undertaken a socio-economic impact assessment of the proposed facility and has identified seven businesses within 1km but that it has concluded that the impact arising from the development will be not significant.
- 4.6.2 Horizon states that there would be some generation of economic benefits through the construction of the facilities 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 the Council would agree with the conclusions contained within the assessment subject to the receipt of further clarifications which are requested below.
- 4.6.3 Horizon is currently committed to a local labour target of 22% across the project as a whole. The Council considers that the type of construction activities required to build the off-site power station facilities readily lend themselves to the local supply chain and requests that a commitment is given by Horizon to a higher target for the employment of local people at this development 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 project as a whole. A higher target for this and potentially for the AD sites should not lead to a lower percentage to be achieved on the main site for example.

Further information required

- i. The Council requests that Horizon consider a higher target for the recruitment of local people during the construction and operation phases of this facility and sets out how it will encourage local businesses to engage in its construction.
- ii. Agreement from Horizon that it will provide signage to inform customers of local businesses that they remain open during the construction works and the provision of alternative access routes if required. Reference could be included within revised sub-CoCP.

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

- i. Dependent upon the further information received, an enforceable commitment to a higher percentage of local labour and supply chain involvement for this facility and a revised sub-CoCP.

4.7 Soils and Geology

- 4.7.1 The Council considers that the baseline conditions have generally been characterised appropriately and the potential effects of the development have been acknowledged.

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Horizon's assessment that a minor adverse effect would occur is considered appropriate providing soil stripping and management is appropriately controlled.

- 4.7.2 The Council would however wish to see further detail in the sub-CoCP to improve its enforceability and precision.

Further information required

- i. Improve precision within the Code Of Construction Practice. For example it states in 9.5.5 that "Soil handling works will cease when soil moisture exceeds specific limits", the CoCP should state that these limits should be set out in a Soil Management plan that is subject to review and acceptance by IACC prior to work commencing.

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

- ii. Amendments to the sub-CoCP either prior to close of examination or subject to a revised DCO requirement allowing IACC to approve an amended document.

5.0 Code of construction practice

- 5.1 The Council supports the intention to inform local residents and the school of the type, nature and duration of the works proposed before they start. Consistent with the comments made with regard to socio-economics the IACC would also ask that the local businesses are also included within these communications.
- 5.2 IACC recognises that within the over-arching CoCP the establishment of a Community Liaison Group is a mechanism in which Horizon can respond directly to community concerns due to matters arising from construction works and it would require that a representative of the Public Protection department shall be in attendance at each and every one of the meetings in order to respond to any potential Environmental Health related concerns and would request that Horizon confirm this appointment. This site, unlike some of the associated sites, does bring development very close to existing residential properties and as such the Council would expect that consideration is given to the way in which construction is managed.

Noise

- 5.3 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.
- 5.4 Given the proximity of residential properties, the Council would wish to approve the siting and design (the sub-CoCP states 'up to 3.6m') of the site hoardings which are proposed as acoustic screens. This approval could occur through the S61 application process.

Air Quality, dust and odour

- 5.5 Horizon have not provided Amber and Red trigger levels for human receptors within the sub-CoCP relevant to the construction of this facility. The Council 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.
- 5.6 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. The Council would expect to receive confirmation that such monitoring would be undertaken and would wish to agree threshold levels with Horizon.

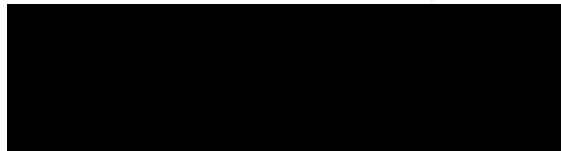
Summary of Mitigation and Compensation Measures to be secured in the DCO

- i. Either through a detailed sub-CoCP or via the s61 process further details on the mitigations, monitoring and reporting of air, dust, noise and vibration to be agreed with IACC. This is to include for the agreement of thresholds.

6.0 Conclusion

- 6.1 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