

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.*

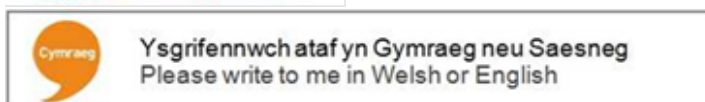
Bydd fersiwn Gymraeg yn cael ei ddarparu cyn gynted a phosib / *A Welsh version of the submission will be provided in due course.*

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.

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Sent by email

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Dyddiad / Date: 02/10/2018

Dear Kieran,

OFFICIAL SENSITIVE

Review of Horizon's DCO Submission (A5025 off-Line)

Introduction

Following the submission of the Isle of Anglesey County Council's (IACC) Relevant Representations to the Planning Inspectorate and the SOCG workshop held on the 24th July 2018, the purpose of this letter is to provide you with further detail and clarity on the IACC's position in relation to each thematic issue and site. 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 the right scheme for Anglesey.

The IACC is supportive in principle of the proposal for Wylfa Newydd. Potentially it is an unprecedented opportunity, subject to appropriate actions, mitigation and controls, to make a substantial contribution to the transformation of the economies of Anglesey and the wider North Wales region. However, given the scale and complexity of the project, particularly for North Anglesey, the impacts could be profound and the IACC's support for the project does not come at any cost. Where adverse impacts cannot be avoided, appropriate mitigation should be implemented to offset the identified, significant adverse impacts. Compensation will be required in respect of residual impacts that cannot be mitigated. The aim of this letter is to outline these issues / impacts and to define the mitigation measures required with regard to the proposed off-line highway works to the A5025 in order to make the development / impact acceptable in planning terms.

The matters raised below represent the IACC's response to the DCO application. The IACC reserves the right to add to or amend these issues (and raise new issues) as necessary in its Written Representations and Local Impact Report.

Context

The A5025 connects the Power Station main site to the A55 and wider trunk road network. 16.5km of the A5025 has been identified for improvement running from the proposed Power Station Access Road Junction south to Valley. No works are proposed east of the Power Station main site. The length of A5025 identified for improvement has been divided into eight sections, with a further section associated with the proposed Power Station Access Road Junction. Of these, Sections 1, 3, 5 and 7 and the Power Station Access Road Junction are included within the scope of the A5025 Off-line Highway Improvements. The purpose of these works (and the on-line works which are the subject of a TCPA consent) are to improve road safety, reduce congestion and to address issues relating to effects on the amenity of residents living along the A5025 corridor. The works are identified by Horizon as being a key mitigation measure in the context of the Wylfa Newydd project and the submitted Phasing Plan (Document 8.29) indicates that work will commence in the middle of construction year 1 and complete by the end of year 2. The works will be permanent.

Local Policy

IACC recognises that the proposed development will form part of the Development Consent Order (DCO) application and therefore will not be determined by the Council. Notwithstanding this, the Joint Local Development Plan (JLDP) and Supplementary Planning Guidance will carry significant weight in the decision-making process. The following paragraphs summarise IACC's current policy position regarding this element of the application.

Section 4 of Policy TRA 1 of the JLDP identifies improvements to the strategic transport network through safeguarding known strategic schemes identified on the proposals maps. Part (iii.) of Section 4 of the policy refers to improvements on the A5025 Valley to Wylfa in association with the Wylfa Newydd project as a strategic scheme required to deliver a national significant infrastructure project.

Paragraphs 6.1.45 and 6.1.46 of the Explanation to Policy TRA 1 in the JLDP highlight the current limitations along parts of the A5025 and identifies four main locations which require significant improvements. These locations correspond to Horizon's sections 1, 3, 5 and 7 for off-site highway works. These locations/sections are shown as safeguarded areas within the JLDP Proposals Map/relevant inset plans. IACC notes that the Power Station Access Road Junction is not shown as safeguarded within the JLDP as it did not form part of the strategic scheme identified during the earlier pre-application process.

Given the identification of the off-site works within the JLDP IACC consider them to be acceptable in principle. The following sections of this letter set out topic specific matters which require further discussion.

Summary of Main Issues

Historic Environment - Archaeology

IACC agrees with the Environmental Statement (ES) assessment of large magnitudes of permanent change occurring during construction period because of the loss of archaeological remains although it is of the view that the individual valuations that have been assigned within the assessment cannot always be considered reliable.

IACC notes that the ES has identified individual archaeological features or HER entries as discrete receptors and considers that this may result in a potential understatement of the significance of heritage assets likely to be affected by the proposed development. This is because the

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archaeological landscape traversed by the proposed A5025 improvements is part of a rich and complex archaeological landscape that is fundamentally connected with that on the Power Station main site. In IACC's opinion, the contribution of these links to the archaeological value of these features has not been acknowledged in the ES.

Horizon has argued that archaeological mitigation would reduce the magnitude of change to heritage assets to negligible. Given the relatively limited extent of the areas subject to disturbance, this seems appropriate in most cases, although more detail of specific proposals needs to be submitted to IACC to enable it to confirm that this mitigation presents an appropriate response. A review of each relevant road section has been undertaken and the following comments are provided.

Section 1: Valley

Horizon's conclusion that few archaeological remains of limited value are anticipated appears to be appropriate in the opinion of IACC.

Section 3: Llanfachraeth

The conclusion that archaeological remains of regional value at most would be affected appears to be appropriate. The IACC does not however necessarily agree that the limited artefactual assemblages identified in evaluation work is such that the archaeological value should be low. Limited assemblage is a characteristic of the archaeological resource for many periods of human activity in this area. Notwithstanding, whilst some assets might in the opinion of IACC be valued as medium, as opposed to low, this would not materially affect the overall conclusions of the assessment.

Section 5: Llanfaechlu, Section 7: Cefn Coch, Section 8: Power Station Access Road Junction

The conclusions that archaeological remains of regional value at most would be affected and that there is a limited potential for previously unrecorded remains appear to be appropriate.

Effects upon Setting

IACC considers that changes to setting due to the works would be relatively localised as a result of the presence of the existing major road and the topography of the area. IACC has reviewed the assessment of setting contained within the relevant documentation. While it is likely that construction period effects would be of an increased magnitude, it is not anticipated that these effects would be of sufficient duration to give rise to any lasting change. The following comments are made.

Section 1: Valley

The conclusion that indirect effects are not anticipated appears appropriate.

Section 3: Llanfachraeth

The assessment that no significant adverse effects would arise on the setting of heritage assets appears appropriate. It is not clear to what extent the diversion of through traffic from the village and on to the proposed bypass would present an enhancement in the settings of the listed buildings along the road frontage within the village, particularly in terms of noise as this aspect of the works is not considered in the ES.

Section 5: Llanfaechlu

The predicted lasting moderate effect on the Capel Soar standing stone appears appropriate and should be considered as harm of less than substantial magnitude which will need to be considered in the balance against the benefits of the proposed scheme.

The predicted moderate effects on two listed buildings (Siop Soar, and the Black Lion Inn) during

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construction would constitute harm to significance in terms of NPS-EN1 5.8.14, although the duration of these harms would be limited and should be weighted accordingly. Similar effects on the non-designated Rhos-ty-mawr, which is assessed as of equivalent value to a Grade II listed building, should also be considered.

Section 7: Cefn Coch and Section 8: Power Station Access Road Junction

The assessment conclusion of limited effects on heritage assets appears appropriate.

○ *Further Information Required*

- No mitigation is proposed by Horizon in respect of the effects which have been identified. IACC would wish to see further detail on measures to reduce noise and traffic within the villages of Llanfaethlu and Llanfachraeth as part of an update sub-CoCP or CMS.
- Given the nature of the proposals and their location the IACC recognises that it is unlikely that harm caused to change in the setting of Capel Soar standing stone can be meaningfully mitigated. The standing stone is however easily visible from the current A5025 and Horizon should identify potential compensation measures which could include an information board or similar at an appropriate location.

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

- 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.
- Compensation in the form of enhanced interpretation for the Capel Soar standing stone
- The sub-CoCP should also be updated to reference measures to restrict construction traffic through the villages of Llanfaethlu and Llanfachraeth.

Natural Environment

Ecology

IACC's review of the ecological assessment contained within the ES and supported by appendices is that there are omissions from the baseline information/assessment. In IACC's opinion, the ecological assessment conclusions tend to be generalised and not clearly/specifically linked to the relevant underpinning baseline survey data/reports/figures, site design and planned mitigation. The ecological assessment often relies on cross-references to other reports and ES chapters, without fully transparent explanation and/or justification of ecological assessment conclusions. Whilst these issues are unlikely to substantively alter the overall conclusions regarding significance of ecological effects IACC considers the ecological assessment would be more robust if certain issues were addressed. The following comments are made.

Bats:

The surveys could be regarded as out-of-date and inconsistent with the latest bat survey guidance (Collins et al 2016). The assessment of effects on bats tends to be generalised and in the opinion of IACC the overall conclusion that the road alignment will result in a minor positive effect on bats is not well-substantiated. Risks of vehicle collisions and habitat loss and habitat severance are not assessed in the context of bat ecology, survey data and embedded mitigation.

The conclusion that construction noise effects on bats will be comparable to the effects of current traffic noise is not clearly explained (e.g. based on distances from roosts).

The evaluation of bat populations/assemblages is considered to be generalised and avoids evaluating each species (e.g. only certain bat species are of Principal Importance). The nature conservation value of certain species may also be understated – for example the Bat Conservation Trust regard Natterer's bats as a scarce, poorly known species, with the UK's population being of international importance. It is considered that there are discrepancies between references to species in the evaluation of the bat assemblage, compared to those referred to as recorded during bat surveys.

The types of roost that could be affected are not characterised (e.g. maternity, hibernation, mating etc) and the baseline status of different bat species (foraging) is not well characterised with only passing, non-specific reference made to severance of bat habitats. IACC notes that there is an absence of survey data for some of the structures with moderate and high roost potential (e.g. potential tree roosts at Section 7) and this is not fully addressed whilst it is unclear whether lighting effects on foraging bats are scoped-out. The assessment of loss of potential tree roosts at Section 7 is unclear and the baseline status of bat roosts at the Power Station Access Road Junction is unclear.

Otter and water vole:

The assessment of effects on otter is generalised and not well-substantiated through reference to survey data and figures/plans and details of the distance between construction activities and recorded otter activity. Other than commitments to maintaining riparian connectivity the mitigation of construction effects on otter is unclear. It is also unclear if effects on otter habitats that are remote from watercourse crossings are assessed e.g. otters may use woodland, scrub, tussocky grassland, ponds/wetland that are some distance from a watercourse and natal holts can be prone to disturbance at distances up to 250m from construction activity. Regarding water vole, IACC considers that the 'county' value given may be understated and is unsubstantiated because established/self-sustaining water vole populations would almost certainly be of national (Wales/UK) nature conservation value. There is residual uncertainty as to whether water vole habitats/burrows will be avoided and the extent of habitat loss/disturbance/severance and therefore the scope of the associated mitigation may not be appropriate.

Section 7 Mammals and badgers:

The justification for scoping-out effects on mammal species that are of Principal Importance for biodiversity conservation (e.g. hedgehog, polecat, brown hare, harvest mouse etc) is not explained. Similarly, the basis for scoping-out effects on badgers is unclear and unsubstantiated by survey data, habitat suitability assessments, estimated habitat losses and/or the location/scope of planned or embedded mitigation.

Amphibians:

The EIA relies on Great Crested Newt (GCN) survey data that is out of date and the baseline status of GCN is not clearly characterised (number of ponds, pond suitability, inaccessible ponds and GCN status, distribution and distance from construction areas). The evaluation of GCN populations is unclear and the conclusion that the on-site and off-site road improvements will result in a minor positive effect on GCN is not well-substantiated. The basis for scoping-out effects on common toad is not explained.

Reptiles, Birds and Invertebrates:

The basis for the scoping out of effects against each receptor type is again unclear and unsubstantiated.

Fish:

IACC considers the assessment of effects on fish to be generalised in that it treats all fish as one receptor, despite many lamprey and eel populations being of national and/or international importance. It is unclear to IACC if any potential effects on other fish species such as salmonids are scoped-out. The ecological assessment does not clarify whether effects on fish migration are scoped-out. In places the assessment is unclear if effects of watercourse crossings on fish have been assessed or whether fish are absent or the sub-CoCP is simply referenced in place of assessment. The assertion that the affected eel population (and populations of other 'fish' more generally) is small is not well-substantiated, nor is the assignment of 'county value' (or lower) to fish.

Terrestrial and freshwater habitat:

The assessment (or scoping-out) of habitats is generalised. A more robust assessment would assess (or scope-out) effects on each habitat quantitatively and/or qualitatively. Effects on hedgerows are scoped-out on the basis that none of those that will be affected are 'important' according to Hedgerows Regulations criteria (ecology), however, IACC considers this conclusion may overlook hedgerows that are a habitat of Principal Importance for biodiversity conservation in Wales.

The assertion that waterbodies within the study areas are generally ephemeral and are of negligible value for freshwater species (other than fish) is generalised and not well-substantiated. Effects relating to Invasive Non-native Species are not clearly assessed or scoped-out in IACC's opinion.

EIA Approach

In addition to the comments made above concerning the approach to the scoping out of potential effects, the assignment of value and the age of some survey data, the IACC would also note that effects potentially arising from severance are largely dismissed without clear justification.

IACC would also wish to receive further justification for the basis for identifying bats as the only noise sensitive receptor at certain highway sections. The scoping-out of effects of changes in lighting, air quality and water quality on ecological receptors during construction is also generalised whilst operational water quality effects are scoped-out without clear justification.

The predicted operational traffic levels and reduced noise levels at some locations, relative to baseline conditions, are not clearly explained by way of justification of the assessment conclusions. IACC is of the opinion that the basis for the 65dB threshold below which noise effects on ecological receptors are negligible is not well-substantiated in the ecological assessment.

o Further information required

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

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the assessment of effects on GCN, the underpinning GCN survey data and specific mitigation proposals. The requirement for GCN mitigation or otherwise at the Power Station Access Road Junction is not clearly set out and further information should be provided.

- Based on the information provided it is unclear whether precautionary working practices to minimise the risk of harming common toads are planned/necessary/appropriate at this site. Any such measures, if required, should be set out in a method statement and agreed with IACC.
- Other measures should be considered for incorporation into an updated 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; measures to avoid creating wildlife refugia during construction; measures to control waste (operational and construction) to avoid increases in rat populations and associated effects on e.g. water voles; covering and sealing (e.g. using sand) excavations or providing a means of escape for trapped animals, such as ramps or gradually sloping edges/ends. Measures to avoid offences relating to breeding birds should apply to built structures, including stone walls, as well as vegetation.
 - *Summary of Mitigation and Compensation Measures to be secured in the DCO*
- IACC would request that the submitted sub-CoCP is revised to include the information requested above or that the DCO requirement OH1 is amended such that a revised plan is submitted to and approved by IACC prior to commencement of development at any section of the A5025. The revised document should also include for the preparation of the method statements referenced above.

Surface and Groundwater

The geomorphological appraisal identifies a need for more detailed consideration of the Afon Cafnan, as the bedrock cascade is a valuable feature and the IACC notes that this detail is lacking at present (in contrast to the level of detail provided for the culvert proposed for the Nant Llygeirian). It is noted that for other culverts of minor watercourses/ditches, that culvert design would occur at a later stage. Whilst this approach might be suitable for drainage features, more detail is required for the Afon Cafnan due to its higher geomorphological value.

Horizon should confirm the arrangements proposed for drainage from road embankments and specifically whether attenuation is to be provided. The submitted designs appear to show that in instances where only areas of new (steep) road embankments are drained, drainage would pass directly into watercourses. IACC requests that confirmation be provided as to whether the amount of run-off assessed is of 'no consequence' or whether allowances have been made for pro-rata runoff rate reductions in the other attenuated sub-catchments.

IACC notes that there would be an increase in flood risk at one residential receptor in Section 3 (Afon Alaw viaduct). The assessment concludes that detailed design will be able to prevent this minor increase in flood risk but IACC would wish to understand the fall-back position should such design prove physically/financially infeasible.

Further detail should also be provided in relation to wells and private water supplies as IACC has concerns regarding the assumptions made which it considers to be inconsistent and lacking in detail. IACC notes that no site visits have been undertaken and that there appear to have been no attempts to gather additional information. Document G8 notes that the ground investigation identified discontinuous thin aquifer horizons with low storage and this therefore

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means that Private Water Supplies (PWS) are potentially vulnerable to local changes which may affect their catchment. A better understanding of PWS/well use, construction, abstraction quantity and purpose should be provided rather than reliance on monitoring of one PWS at Erw Goch.

A further concern relates to the groundwater level information used in assessment of the potential effects of cuttings/embankments. Reference is made to a groundwater level with the date of May – June 2016 and with no consideration of seasonal variation in groundwater levels, or the antecedent climatic conditions.

- *Further information required*

Specific further detail is sought for the following aspects:

- More information regarding the Afon Cafnan culvert design;
- More information on the attenuation/treatment of drainage from road embankment only areas;
- An alternative approach for the Afon Alaw flood risk receptor if modelling indicates the embedded design approach not physically/financially feasible; and
- Additional information in relation to wells and private water supplies as set out above.

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

- IACC may require amendment to DCO requirement OH2 to include for reference to addition drainage details unless the information requested above is supplied to and agreed with IACC prior to the end of examination.

Landscape

The proposed A5025 off-site highway works could give rise to effects upon the landscape character of the AONB. The assessment presented by Horizon for Sections 3 and 5 during the construction phase conclude that effects would be Slight (not significant) at each location. IACC would request that consideration also be given to the combined effect on the AONB which may be more than Slight, e.g. Moderate and significant.

A lack of an assessment of combined effects upon landscape character is also a feature of the consideration of LCA 5 and LLCA 21. For both the construction and operational phases the assessment has identified effects upon the landscape character of LCA 5 at individual locations at Sections 1, 3, 5 and 7 only. Recorded individually as Moderate significant during construction, the combined effects on LCA5 may be more than Moderate and, therefore, more significant.

In the context of LLCA 21 construction phase effects also have also been assessed separately, such that the combined effects of Section 7 and the Power Station Access Road Junction on LLCA 21 during the construction phase have not been assessed. An assessment of the combined effects of the construction phases in Sections 7 and at the Power Station Access Road Junction on LLCA 21 should be provided.

The geographical extents of predicted significant effects upon landscape character have not be provided yet these are important factors to take into account when combining effects on landscape character with other topics in order to predict the Combined Topic Effects; particularly with respect to landscape designations. The geographical extent of all predicted significant

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effects on landscape character within the AONB, the SLA, LCA5 and the LLCAs should be provided.

Where Minor, Moderate or Major adverse combined effects are referred to in ES Chapter G12 (para 12.3.40) an explanation is required as to whether these definitions relate to the DMRB criteria for magnitude of change or the EIA criteria for significance. IACC notes that there are differences between the EIA/LVIA and DMRB/A5025 assessment criteria and requests further information regarding the comparability of the two sets of criteria and how any incompatibilities have been overcome when combining the assessments in the Combined Topic, Intra-Project and Inter-Project Cumulative Assessments.

With regard to inter-project cumulative effects, Chapter I5 does not state whether there would be any significant inter-project cumulative effects arising from the A5025 Off-line Highway Improvements in conjunction with the Reasonable Foreseeable Future Projects (RFFPs). Appendix I5-1 identifies Major (significant) adverse cumulative inter-project effects on local landscape character during construction and Moderate adverse cumulative inter-project effects on local landscape character during operation but it is not clear to what extent the A5025 Off-line Highway Improvements contribute to or alleviate these significant effects.

IACC notes that there would be permanent adverse effects on landscape fabric because of the highway works with several sections of Important Hedgerow and at least one section of cloddiau lost. However information relating to cloddiau is limited and IACC requires that a survey be undertaken to identify the locations of the cloddiau field boundaries which are referred to in ES Chapter G10. Other gaps in baseline information include a requirement to update the Tree Reports and Arboricultural Impact to include a survey of the vegetation near the Power Station Access Road Junction.

In addition to baseline gaps certain information presented in the form of figures and reports appears inconsistent. For example, confirmation should be provided regarding the field boundaries (hedgerows and walls) illustrated in ES Appendix G10-9 A5025 Landscape Scheme – Figures 1 – 10. IACC requires clarity as to whether the existing vegetation (shown in grey) and existing walls (dark grey) outside the Order Limits will remain unaffected by the development and whether the existing vegetation to be retained (in green) and the existing walls to be retained (brown dots) inside the Order Limits would not be affected by the works.

Clarity is also required as to whether Design Principle 21 applies to the Llanfaethlu off-line section (Section 5) only, as stated, and/or the Llanfachraeth off-line section (Section 3). The route of the shared use footway/cycleway provided as part of the A5025 Off-line Highway Improvements and referred to in Design Principle 36 and the locations of all proposed turf-faced consolidated earth banks should be confirmed on plans.

In common with all ES Landscape chapters reviewed by IACC it is noted that the assessment does not include for the identification or consideration of effects upon the landscape elements of the five individual sites.

- *Further information required*

The following additional information and mitigation should be submitted:

- Additional tree and shrub planting should be incorporated into the Detailed Landscape Scheme to screen the new road, especially near the AONB and where small sections of fields have been severed and may not be suitable for agricultural uses (see also Visual comments below).

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- Some of the replacement field boundaries should be earth banks and cloddiau, especially in locations where earth banks and cloddiau are to be removed and near the AONB.
- Enhancements to existing boundary features that are to be retained within the site, for example, infill planting and management to improve the structure and diversity of hedgerows, and repairs to stone walls and cloddiau.
- All new plants and seeds should be of local/North Wales provenance and grown in a local nursery (ideally to be established by Horizon on the island) to acclimatise the plants to the local conditions prior to planting on the site and increase the likelihood of a successful landscape scheme. This would also create local employment and needs to be implemented at least two years prior to the plants being needed on-site.
- The careful separation of topsoil, subsoil and overburden on the site during the cut-and-fill remodelling of the local topography, so that the appropriate topsoil and subsoil are used in the planting and amenity grassland areas (topsoil) and species-rich grassland areas (subsoil).
- All areas disturbed by the works should be reinstated in accordance with the Design Principles, Landscape Scheme and Detailed Landscape and Maintenance Schemes.
 - *Summary of Mitigation and Compensation Measures to be secured in the DCO*
- Subject to the level of detail provided and agreed with IACC prior to the close of the Examination, there may be a requirement for additional or revised DCO requirements to allow for the submission of additional detailed design information for IACC approval in advance of works commencing.

Visual

IACC has reviewed the visual assessment undertaken into the construction and operation phase of the proposed development.

Section 1

IACC agrees with the conclusion reached regarding the significance of effects for both phases.

Section 3

In its review of Section 3 construction effects IACC agrees with the conclusions reached except for receptors R30, R40 and PR12.

During the operation of the A5025 (year 1) several visual receptors would experience significant effects and IACC's review differs from that presented by Horizon regarding R27 R30 R31, and R40. Regarding public footpaths IACC disagrees with the magnitudes of impact identified by Horizon at PR7. At year 15, IACC also disagrees with the assessment conclusions for R27, R30, R40, PR8, PR9, PR13, PR14 and T1. Recommendations for additional mitigation are set out below.

Section 5

IACC's review of Section 5 has reached different conclusions to those reached by Horizon at the construction stage for receptors R47, R49, R50, R57 and PR18, with one difference in

conclusion at operation year 1 (R55) and agreement with all stated magnitudes of effect at year 15.

Section 7

For Section 7 IACC comes to a different conclusion to that reached by Horizon for R79, R81, R85, R94, R95 although the differences identified are unlikely to alter the residual levels of significance. For operation (year 1) IACC comes to a different conclusion for R76, R79, R80, R87, R89, PR23 and T9. For operation (year 15) IACC comes to a different conclusion for R79, R80, R87 and PR23 IACC considers receptors would experience magnitudes of change different to those reported within Horizon's assessment.

Further detail concerning IACCs conclusions can be provided with a view to reaching agreement with Horizon on the levels of significance recorded.

IACC is broadly in agreement with the mitigation measures for visual effects which have been put forward by Horizon. Modifications and additions are proposed below.

- *Further information required*

The following recommendations are made regarding the provision of further mitigation or compensation and IACC would expect Horizon to respond to each request with appropriately updated plans or documents.

Section 1

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

Section 3

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

provide some additional screening of the northern end of Section 3 for residents at R33 and users of the permanently re-routed PR13.

Section 5

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

Section 7

- Regarding receptors R76; R79; R80; R87 and PR23 there is scope for additional mitigation through the planting of hedgerow trees in a section of the hedgerow sited along the eastern corridor boundary.
- There are opportunities for off-site planting in two remnant fields that will be formed between the former A5025 and the eastern boundary of the corridor of Section 7 of the off-line A5025.
- The PRoW network in the Section 7 study area is observed in the baseline descriptions as being inaccessible. IACC considers that this situation could be remedied through improvements to management, access facilities (stiles, gates etc) and signage which would be developed in tandem with IACC's wider recreation and access strategies as set out in the ROWIP 2008-2018.
- Additional compensation measures which IACC would wish to see in Section 7 include for the maintenance and enhancement of the existing field boundaries, including cloddiau, across the Section 7 and Power Station Access Road Junction study areas. The key characteristics of LLCA21 emphasise the disrepair of hedgerow and dry-stone wall/cloddiau field boundaries. In LLCA18 the low level of hedgerow management is a noted characteristic.

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

- Subject to the level of detail provided and agreed with IACC prior to the close of the Examination, there may be a requirement for additional or revised DCO requirements to allow for the submission of additional mitigation for IACC approval in advance of works commencing.

Socio-economics

IACC notes that the assessment identifies that a large land-take of around 132ha of Grade 4 agricultural land is required to carry out the A5025 off-line improvements and that four agricultural land interests would be directly affected requiring Horizon to purchase/compulsory purchase the land to complete the works. As a consequence of the proposals there would be some loss of economic benefit through the reduction in usable agricultural land.

IACC recognises that there would be some economic benefits generated by the project through job creation during the highway improvements and positive impacts on local supply chains potentially using local contractors and businesses. Although the impact on local businesses is likely to be minimal there are six businesses located within 1km of the proposed site and there may be some minor impacts on terms of access disruption.

- *Further information required*
- 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

- Dependent upon the further information received a commitment to appropriate signage within a revised sub-CoCP.

Traffic and Transport

General information request:-

- The IACC are eager to view a draft Section 38 agreement for the Offline improvements which will require full agreement prior to commencement of works.
- The IACC requests a schedule of boundary features that the Highway Authority will be required to maintain following the implementation of the improvements. The schedule should be developed and finalised in agreement with the IACC as part of the Highways Collaboration Agreement.

Highways comments per improvement section:-

Valley

- The IACC are eager for this section to be completed first to minimise the impacts on the operation of the existing Valley crossroads junction.
- Further discussions are required on introducing suitable crossing provision for pedestrians across the frontage of the Petrol Filling Station (PFS) to the existing bus stop shelter along the A5. This includes the provision of a new kerbed footway in front of the PFS forecourt.
- Following the opening of the Valley bypass, an assessment of the signal configuration and timings will be required as part of the stopping up of the northern (A5025) highway arm.
- The IACC requests that an improved cycle link is provided between the proposed roundabout and A55 Junction 3 as a mitigation measure against the increase in HGV traffic.

Llanfachraeth

- The IACC will require full access from both the northern and southern direction in order to maintain the over-bridge over the two rivers. Horizon should be negotiating with land owners to ensure future access to structural and drainage assets that will be maintained by the Authority.

- The IACC also seeks assurances that construction traffic associated with constructing the Llanfachraeth bypass will be effectively managed, with disruption of local residents kept to a minimum. This may include providing temporary measures to avoid construction traffic having to route through the village during construction of the bypass, e.g. provision of a 'Bailey Bridge' across the two rivers.

Llanfaethlu

- The IACC seeks further clarification/detail on the area outside Ysgol Rhyd Y Llan once the road becomes a "dead-end". This will require full discussions with both the Highways and Education departments of the IACC.

Code of Construction Practice

IACC supports the intention to inform residents, businesses (including agricultural operators) and Rhyd Y Lan primary school of the type, nature and duration of the works proposed before the works commence.

IACC recognises that within the over-arching CoCP the establishment of a Community Liaison Group is a mechanism by which Horizon can respond directly to community concerns due to matters arising from construction works. It requires that a representative of the Public Protection Department shall be in attendance at all meetings in order to respond to any potential Environmental Health related concerns and IACC would request that Horizon confirm this appointment.

Noise

The noise and vibration management strategy establishes at a high level, how certain aspects of construction will be undertaken with reference to mitigation. It includes for the establishment of safe working distances, the adoption of respite periods where significant effects upon sensitive receptors cannot be avoided and the types of measures which could be implemented to reduce levels below those assumed in the ES. IACC understands that the application for prior consent under Section 61 will include a noise assessment.

Air Quality, dust and odour

Horizon have not provided Amber and Red trigger levels for dust in respect of human receptors within the sub-CoCP and relevant to the construction of this facility. IACC would wish to agree these levels to ensure that adequate protection to local residents is provided..

Horizon refer to undertaking monitoring of particulates (total particulates, PM10 and PM2.5). IACC would expect to agree appropriate trigger levels with Horizon.

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

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

Other matters

The proposed off-line highways works are intended to mitigate the effects arising from construction traffic upon the communities which live along the existing road network. As such it will be critical that the works are implemented in accordance with Horizon's submitted Phasing Strategy which indicates delivery by the end of year 2. IACC requests that Horizon confirm the contingencies it would implement should completion be delayed.

Conclusion

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. IACC looks forward to receiving Horizon's response to the requests made and ultimately, to the preparation of a Statement of Common Ground

Yours sincerely



DYLAN J. WILLIAMS

Pennaeth Gwasanaeth – Rheoleiddio a Datblygu Economaidd
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