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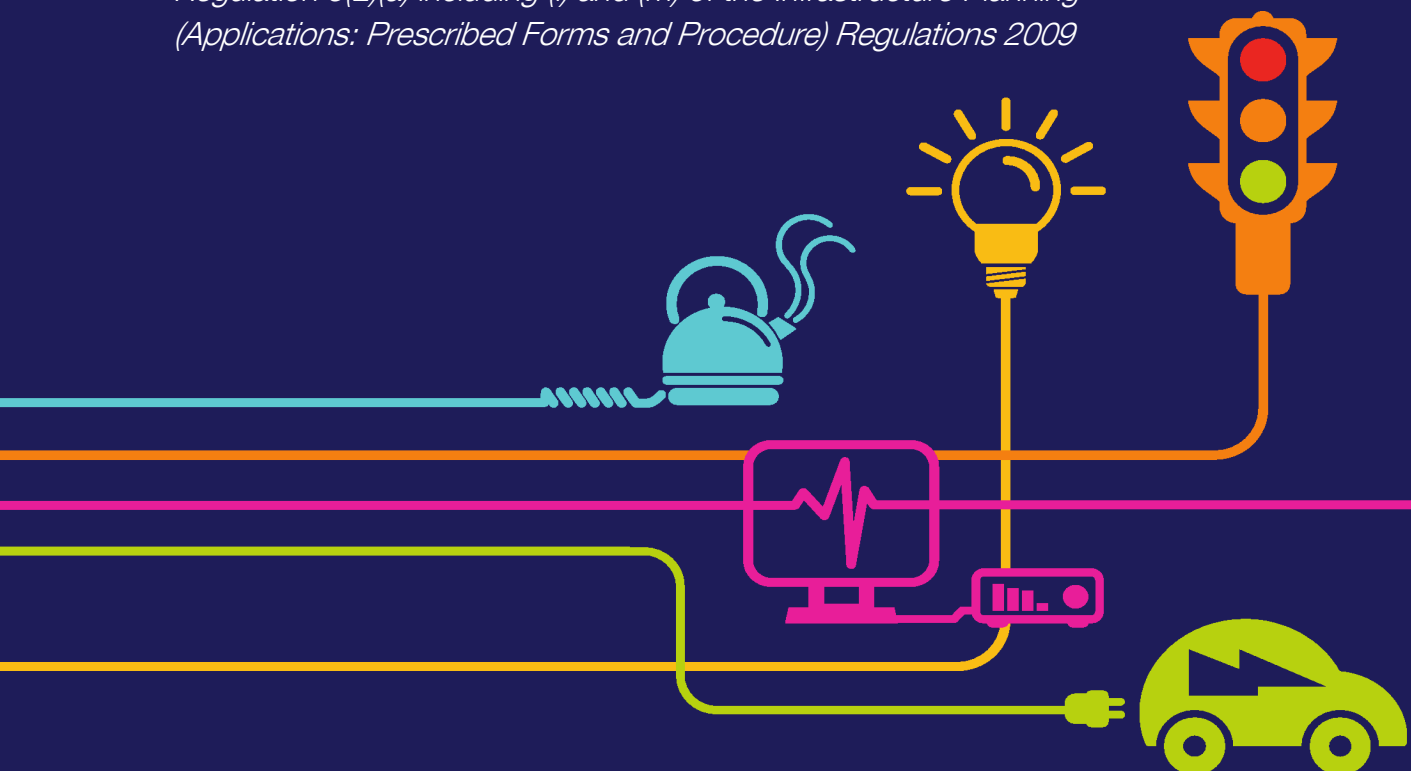
5.5.2.2

Schedule of Responses to the PEIR

Chapter 5 – Appendix 2

National Grid (North Wales Connection Project)

*Regulation 5(2)(a) including (l) and (m) of the Infrastructure Planning
(Applications: Prescribed Forms and Procedure) Regulations 2009*





North Wales Connection Project

Environmental Statement

Document 5.5.2.2 Appendix 5.2 Schedule of Responses to the PEIR

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Final September 2018

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1 Introduction

- 1.1.1 The preliminary findings of the Environmental Impact Assessment (EIA) of the Proposed Development were published in the form of a Preliminary Environmental Information Report (PEIR) to support the statutory pre-application consultation being undertaken, required by Section 42 and Section 47 of the Planning Act 2008.
- 1.1.2 A number of the Section 42 consultees provided responses in relation to the PEIR. Each of the technical chapters explains how these comments have been taken into account within the ES where relevant.
- 1.1.3 This document provides a summary of the responses from stakeholder organisations on the PEIR. Only those stakeholders who have commented on the PEIR have been included.
- 1.1.4 Stakeholder responses are provided below. The document is structured as follows:
- Isle of Anglesey Council (IACC);
 - Gwynedd Council;
 - Natural Resources Wales (NRW);
 - Welsh Government;
 - National Trust;
 - Royal Society for the Protection of Birds (RSPB);
 - Snowdonia National Park Authority;
 - Amlwch Town Council;
 - Beaumaris Town Council;
 - Campaign for the Protection of Rural Wales;
 - Cwm Cadnant Community Council;
 - Horizon Nuclear Power Services Limited;
 - Llanbadrig Community Council;
 - Llanfairpwll, Llanfair yn Neubwll, Penmynydd, Pentraeth, Trearddur and Trewalchmai and Llanfihangellesceifiog Community Council;
 - Mechell Community Council;
 - Menai Science Park;
 - National Farmers' Union (NFU) Cymru;
 - Network Rail Infrastructure Ltd;
 - North Anglesey Council's Partnership;

- North Wales Fire and Rescue Service;
- North Wales Police;
- One Voice Wales;
- Orthios Group Holdings Limited;
- Pentir and Y Felinheli Community Council;
- Public Health England;
- Public Health Wales;
- Snowdonia Society; and
- Welsh Ambulance Service NHS Trust.

2 Isle Of Anglesey County Council

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| Table 1: Isle of Anglesey County Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| 1.0 Introduction | | | |
| | <p>On 5th October 2016 National Grid Electricity Transmission plc (National Grid) commenced its statutory consultation under sections 42 and 47 of the Planning Act 2008 for the North Wales Connection Project (the project).</p> <p>The consultation includes a substantial amount of documents which together provide information on the project, its evolution to date and the potential effects upon the environment (social, economic and environmental) that could arise.</p> <p>This document represents the Isle of Anglesey County Council's (IACCs) response to one of the consultation documents, namely the Preliminary Environmental Information Report (PEIR) and its associated appendices.</p> | IACC 1.1 | Noted |
| 2.0 The Role Of Preliminary Environmental Information | | | |
| | <p>A PEIR provides preliminary environmental information (PEI) in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 (as amended by the Infrastructure Planning (EIA) (Amendment) Regulations 2011 and 2012)('the 2009 EIA Regulations').</p> | IACC 2.1 | Noted |
| | <p>The PEIR is intended to present preliminary information about the potential significant environmental effects of the proposed project, as they are understood at that stage in the pre-submission / design process. It presents the early findings of the, as yet incomplete, Environmental Impact Assessment (EIA) and gives an indication as to whether identified environmental effects are likely or unlikely to be significant and, where possible, the degree of significance.</p> | IACC 2.2 | Noted |
| 3.0 Structure And Presentation Of The PEIR | | | |
| | <p>The PEIR suite of documents submitted for the S42 consultation is extensive and to assist with navigating the hard copy documents it would have benefitted with the inclusion of a contents page at the beginning of each document to denote chapter headings / numbers or alternatively tabs inserted at the beginning of each chapter.</p> | IACC 3.1 | Noted |

| Table 1: Isle of Anglesey County Council | | | |
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| 5.0 General Observations | | | |
| | <p>National Grid state 'The results assessment presented within the PEIR is to some extent based on professional judgement, and baseline assessment is yet incomplete. National Grid states that 'mitigation measures have not all been defined or designed'.</p> <p>The IACC acknowledges that the PEIR contains preliminary environmental information (ie. is not a completed EIA), however, the Council would highlight that where it has not been possible for National Grid to undertake a completed quantitative assessment of predicted impacts, this means that IACC's ability to meaningfully engage on assessment outcomes and input into the project design is limited.</p> | IACC 5.1 | Noted |
| | The Council expects that National Grid will engage in further consultation on the emerging outcomes of the EIA, the draft Environmental Statement (ES), and associated management plans prior to submission of the DCO application. | IACC 5.2 | Consultation with consultees following the publication of the PEIR is documented in Chapter 5 of the Environmental Statement, EIA Consultation (Document 5.5). |
| | Within National Grid's Draft Route Alignment (DRA) and Menai Strait Crossing (MSC) Reports, limited detail has been provided on the design measures that have been built in to the proposed development in order to avoid or reduce effects at source. As the Council has recommended consistently during each stage of consultation, the ES should be accompanied by a design approach document or ES chapter setting out how the infrastructure has been designed to minimise adverse effects. More detailed information and where relevant cross reference to the design approach document should be made from the topic specific chapters. | IACC 5.3 | Noted, this has been included in ES Chapter 3 Description of the Proposed Development (Document 5.3). |
| | The Council also notes the PEIR does not contain the detailed proposals that will be required to mitigate the impacts of the proposed development. The Council expects that National Grid will consult on the required mitigation measures as the project evolves and produce a detailed mitigation strategy and tracker. | IACC 5.4 | <p>Following the publication of the PEIR, National Grid has continued consultation on the development of mitigation measures as outlined in Chapter 5 of the Environmental Statement, EIA Consultation (Document 5.5).</p> <p>Mitigation measures and residual effects during the construction, operation (including maintenance) and decommissioning stages of the Proposed Development are provided in Section 9 of technical chapters (Document 5.7-5.18).</p> |

| Table 1: Isle of Anglesey County Council | | | |
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| | | | <p>Schedule of Mitigation (Document 5.28) outlines all the mitigation measures provided throughout the ES.</p> <p>The CEMP (Document 7.4) provides control and management measures (CMM) which will be adhered to during the construction phase of the Proposed Development to reduce adverse effects.</p> |
| | In relation to construction aspects, the Council suggests that these are captured in the Construction Environmental Management Plan (CEMP). The CEMP consulted on within the PEIR documentation outlines general mitigation commitments that will be secured during the construction stage. The measures contained represent generic best practice and should be supplemented with project-specific measures in accordance with the findings of the EIA. As the IACC highlighted in their scoping response dated May 2016, the IACC expects the CEMP to be a live document, which will be consulted upon and up dated as required. The CEMP and related mitigation measures should be secured by way of DCO requirement. | IACC 5.5 | The CEMP (Document 7.4) includes generic and topic specific measures. It is secured by draft Requirement 6 of the Draft DCO (Document 2.1). |
| | For the avoidance of doubt the Council comments in paragraphs 5.1-5.5 applies to the assessment in each chapter of the PEIR. | IACC 5.6 | Noted |
| 6.0 Consenting (Chapter 2-5 and throughout PEIR) | | | |
| | The IACC's comments on National Grid's consenting strategy are addressed in the Strategic Report Appendix A to the IACC's s.42 consultation report. However, the Council would highlight that the lack of clarity on what comprises the proposed development and wider works raises concerns about National Grid's ability to carry out an effective cumulative assessment. | IACC 6.1 | <p>The wider works do not form part of the Proposed Development, as they are required regardless of the need for the Proposed Development, and will therefore not be consented in the form of a Development Consent Order (DCO) under the Planning Act 2008. The wider works will be consented, where appropriate, under the Town and Country Planning Act 1990 (as amended) or Section 37 of the Electricity Act 1989 and will be supported by the appropriate level of environmental assessment.</p> <p>The ES presents the cumulative assessment undertaken for the Proposed Development. The wider works is referenced to in ES Chapter 21 Statement of</p> |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | Combined Effects with the Wider Works (Document 5.21). |
| | The DCO submission now consists of the upgrades required between Wylfa and Pentir, rather than the North Wales Connections Project including wider works in Gwynedd. The IACC note that a clear consenting strategy for all elements of the project, including Associated Development and Wider Works has yet to be provided. This was requested in response to Scoping, but is not provided in the Section 42 Consultation material. The ES and wider supporting technical documents will need to set out a clear and unambiguous approach to the assessment of all elements of the wider project within the assessment of inter-related and cumulative effects. | IACC 6.2 | <p>A description of the wider works and potential combined effects of the wider works with the Proposed Development is provided in ES Chapter 21 Statement of Combined Effects with the Wider Works (Document 5.21).</p> <p>Inter-related effects occurring as a result of the environmental effects of two or more separate projects culminating in an overall effect of greater significant than those resulting individuals is provided in ES Chapter 20 Inter-Project Cumulative Effects (Document 5.20).</p> <p>IACC's comments regarding a consenting strategy are addressed in Table 8.33 of the Consultation Report (Document 6.1).</p> |
| Chapter 3 Section 4.4 Table 3.2 List of Typical Equipment to be Utilised | Equipment listed as "Generators (Permanent or Temporary)" with a description that "Generators will either be brought to site in the event or will be left in situ". It is not clear whether there will be permanently installed generators or not. It would be helpful for the ES if a clearer description can be provided. Stand-by generators have the potential to be noisy. If generators are permanent they may need to be tested on a regular basis, in which case some control may be needed over the timing of testing/some noise control provided. If generators are brought to the site when required and then removed straight away no regular testing at the application site would be expected. | IACC 6.3 | Mains power would be used to power the tunnelling activities. Therefore, large generators would not be required, except during the start-up works and for emergency situations. Prior to mains power being connected, generators would only be used during the daytime. Following mains connection, a single 100 kilo-volt-ampere (kVA) generator would be required. |
| 7.0 Construction, Operation, Maintenance And Decommissioning Of The Proposed Project (Chapter 4) | | | |
| | In paragraph 2.4.6 National Grid explain that there are two primary methods that could be employed for tunnel construction; a tunnel boring machine (TBM) and precast segmental lining, or excavation by drill and blast or road header machine and lined with sprayed concrete lining (SCL). It would be helpful for National Grid to clarify the potential impacts associated with each | IACC 7.1 | There are three scenarios for tunnel construction, these are: |

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| | technology option. The IACC should be consulted on a method statement for re- instatement proposals. | | <ul style="list-style-type: none"> Scenario 1 –TBM from Braint to Tŷ Fodol; Scenario 2 – TBM from Tŷ Fodol to Braint; and Scenario 3 – Drill and Blast from both shafts. <p>All three scenarios have been considered within the Environmental Impact Assessment (EIA) as explained in ES Chapter 6, EIA Methodology (Document 5.6).</p> <p>Whilst all three options have been assessed there is a preference for scenario 1. Assessment of potential effects for each of the possible tunnel construction scenarios is provided in Section 2.3 of ES Chapter 4 Construction, Operation, Maintenance and Decommissioning of the Proposed Development (Document 5.4).</p> |
| | <p>National Grid state that 'Disposal of spoil would be necessary, either off-site, necessitating numerous lorry movements, or on-site through creation of earth mounding.' National Grid state that an Energy Plant may be required, but have not yet assessed the impacts.</p> <p>The treatment of spoil requires further definition, including quantities arising, proposals for re-use or disposal and associated transport movements and impacts on local communities. Further commentary is provided within this review in respect of transport impacts, noise, and air quality impacts related to the disposal of soil.</p> | IACC 7.2 | <p>All necessary traffic movements are included in the Traffic and Transport chapter (Document 5.13) and the Transport Assessment (Document 5.13.2.1) and are also assessed in terms of noise and air quality effects in Chapter 14 Air Quality (Document 5.14) and Chapter 15 Construction Noise and Vibration (Document 5.15) These documents have been referenced in the OWMP. The assessment ends when traffic reaches strategic road network. This is essential to allow the contractor flexibility, should a new opportunity arise. Any facilities used for recycling or deposition are covered by their own licences and permissions for traffic movements.</p> |
| | There could also be intra-project effects arising from the treatment of spoil, for example if proposals were put forward to use the spoil for landscaping, which could further have associated socio-economic and recreational impacts. Further assessment of impacts associated with tunnel construction and spoil arising is required. | IACC 7.3 | All impacts related to the proposed management of spoil are assessed in the ES (Volume 5) |

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| | The draft CEMP should contain noise and air quality mitigation measures specifically in respect of the Energy Plant. | IACC 7.4 | The CEMP (Document 7.4) section 3 and section 4 details air quality, noise and vibration mitigation measures for the Proposed Development. It should be noted, the Proposed Development no longer contains an Energy Plant; only emergency generators, the effects of which are assessed. |
| | National Grid state that 'Materials Management Plan (MMP) will be developed to ensure that spoil removed from the launch site during the excavation of the tunnel is removed from site appropriately'. The provision of the MMP is welcomed, and the IACC request to be consulted on this key document as it is developed prior to submission of the DCO application. | IACC 7.5 | IACC were provided a draft OMMP (Document 7.12) for comment as part of a review of the draft ES. |
| 8.0 PEIR Approach And Methodology (Chapter 5) | | | |
| | In Chapter 5 National Grid state that 'mitigation measures have not all been defined or designed'. The definition of mitigation measures is limited, and does not highlight the potential scope for compensation measures and enhancement opportunities. | IACC 8.1 | Chapter 5, Section 2 of the PEIR states that '2.4.8 Mitigation will be categorised in the EIA as follows: <ul style="list-style-type: none"> • Control and Management Measures (CMM): These are measures which will be included within the CEMP such as the use of road sweepers and the implementation of measures to control silt laden runoff during construction etc. • Mitigation by Design (DM): These are measures which have been built into the design, such as the design of the route to avoid certain receptors, pylon choice and conductor type. • Mitigation Measures (MM): These are measures over and above mitigation by design for example anything that has been added to the design purely to mitigate an effect such as landscape planting or acoustic barriers. |

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| | | | <ul style="list-style-type: none"> Compensation Measures (CM): Compensation measures are not mitigation measures, as they do not address the original effect, however they can offset the effect elsewhere, or in a different way. Compensation measures are used when the above mitigation measures cannot be implemented for any reason.' <p>The mitigation measures are detailed in Section 9 of ES technical chapters (Document 5.7-5.18).</p> |
| | It is essential that detailed mitigation measures are consulted on prior to DCO submission. Chapter 5 could be expanded on further to clarify the potential role of offsite mitigation, and enhancement opportunities which may be important aspects of the evolving project design. National Grid states that 'Compensation measures are used when the above mitigation measures cannot be implemented for any reason.' This fails to recognise the role of compensation or enhancement to achieve wider benefit, such as net biodiversity gain. Further dialogue would be expected in relation to mitigation, enhancement and compensation opportunities to be secured by way of requirements and obligations. | IACC 8.2 | <p>Draft copies of all technical ES chapters were issued to IACC for review and comments have since been received and addressed where appropriate.</p> <p>Details of proposed enhancement measures are included within the Enhancement Strategy (Document 7.13), a draft of which was provided to IACC prior to submission of the DCO for comment.</p> |
| | It is not clear how the consideration of health and wellbeing, including the recent National Grid workshops relating to Well-being Assessment will be integrated into the EIA, or submitted in support of the DCO application. The lack of detail within the S42 Consultation documents is of concern to the IACC. Reference must be made within the EIA to the wider health impact assessment for the project when considering potential impacts on health associated with for example, intra-project effects during construction relating to air quality, traffic and noise disturbance. | IACC 8.3 | <p>Consultation with relevant consultees is documented in ES Chapter 5 EIA Consultation (Document 5.5). Findings relating to well-being are provided in the Well-being Report (WBR) (Document 5.27).</p> <p>The following technical chapters have considered the impact on human health where appropriate:</p> <ul style="list-style-type: none"> Traffic and Transport (Document 5.13); Air Quality and Emissions (Document 5.14); Construction Noise and Vibration (Document 5.15); Operational Noise and Vibration (Document 5.16); and Socio -Economics (Document 5.17). <p>The ES demonstrates the Proposed Development would not give rise to significant adverse health</p> |

| Table 1: Isle of Anglesey County Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | and/or well-being impacts throughout the construction, operation (including maintenance) and decommissioning stages. |
| 9.0 Landscape And Visual Assessment | | | |
| | The PEIR presents the Landscape and Visual Chapters separately, however, due to the close inter-relationship between the two chapters they have been combined within this response. | IACC 9.1 | This comment is noted. |
| 9.2 OFF-SITE MITIGATION (Chapters 6 & 7 and also relevant to Chapters 8 & 9) | Due to the nature of the proposed development i.e. including tall structures, it is unlikely that onsite secondary mitigation will do much to reduce the significance of some predicted effects, especially visual effects in respect of overhead lines. Therefore, it is anticipated that off- site measures will be needed to enhance the surrounding landscape and to screen and/or improve views towards the proposed development. It is also anticipated that off-site works to enhance PRow user experience will be necessary where on-site mitigation is not possible. | IACC 9.2 | <p>Secondary measures fall under the umbrella of 'enhancement' as these cannot be guaranteed. Enhancement measures have been considered separately to the EIA as these would be undertaken by voluntary agreement; such measures include consideration of wider landscape enhancement e.g. restoration of boundaries, such as cloddiau, that are not directly affected by the Proposed Development and planting of trees and woodland in the wider landscape. In addition, planting would be offered to residential receptors in the form of a Voluntary Residential Planting Scheme (VRPS). This would include the offer of planting to reduce/ minimise visual effects for eligible properties identified during the assessment.</p> <p>Enhancement measures along with the VRPS are presented in the Enhancement Strategy (Document 7.13), a draft of which was provided to IACC prior to submission of the DCO for comment.</p> |
| | An Off-site planting and enhancement strategy should be prepared and consulted on at the earliest opportunity. This should describe the measures proposed, outline their purpose and set out the methods by which they will be secured as part of the DCO process e.g. as designed in mitigation, planning requirements / conditions and s106 obligations. Commentary should include opportunities for advance planting, provenance and supply of plant stock. | IACC 9.3 | Off-site and enhancement measures along with the VRPS as described above are presented in the Enhancement Strategy (Document 7.13), a draft of which was provided to IACC prior to submission of the DCO for comment. |
| | The process of agreeing the scope and quantum of off-site mitigation on Hinkley C Connection Project began at S42 and continued over a long period of time through to the Issue Specific | IACC 9.4 | Noted. |

| Table 1: Isle of Anglesey County Council | | | |
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| | Hearings conducted during Examination. The process of agreement with third party landowners is likely to be time consuming. | | |
| 9.3 ON-SITE SECONDARY MITIGATION (Chapters 3, 6 & 7 (also relevant to Chapters 8 & 9) | There is no description in Chapter 3 of the PEIR or the other referenced topic chapters as to what secondary landscape mitigation is proposed within the order limits to reduce visual and landscape effects arising as a result of the proposed scheme. This mitigation will be required for example in the form of in situ replacement planting where trees and hedgerows are affected by construction works and also around any site specific infrastructure such as substations, CSECs, Tunnel Head Houses, etc. | IACC 9.5 | <p>Mitigation in the form of reinstatement is included within the CEMP (Document 7.4) and shown on Figure 1 Reinstatement Plans (Document 7.4.1.1).</p> <p>Figures 7.12-7.16 Landscape Mitigation Proposals (Document 5.7.1.12-5.7.1.16) present more detailed information on specification of proposed mitigation planting.</p> <p>These embedded mitigation measures have been assessed as part of the Proposed Development and include for example, planting around the CSEC/THH, in-situ planting such as replacement of hedgerows and boundaries post construction and tree replacement and planting, all within the Order Limits.</p> <p>Secondary measures fall under the umbrella of 'enhancement' as these cannot be guaranteed. Enhancement measures have been considered separately to the EIA as these would be undertaken by voluntary agreement; such measures include consideration of wider landscape enhancement e.g. restoration of boundaries such as cloddiau not directly affected by the Proposed Development and planting of trees and woodland in the wider landscape. In addition, planting would be offered to residential receptors in the form of a Voluntary Residential Planting Scheme (VRPS). This would include the offer of planting to reduce/ minimise visual effects for eligible properties identified during the assessment.</p> <p>Enhancement measures along with the VRPS are presented in the Enhancement Strategy (Document</p> |

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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | 7.13) , a draft of which was provided to IACC prior to submission of the DCO for comment. |
| | <p>These measures need to be described in the relevant chapters with the provision of plans showing proposed measures including new and replacement planting. A draft version of this information should be consulted upon well in advance of the final ES accompanying the DCO submission to allow a meaningful dialogue between National Grid and the relevant consultees. Commentary should include opportunities for advance planting, provenance and supply of plant stock.</p> | IACC 9.6 | <p>Mitigation in the form of reinstatement is included within the CEMP (Document 7.4) and shown on Figure 1 Reinstatement Plans (Document 7.4.1.1).</p> <p>Figures 7.12-7.16 Landscape Mitigation Proposals (Document 5.7.1.12-5.7.1.16) present more detailed information on specification of proposed mitigation planting.</p> <p>These embedded mitigation measures have been assessed as part of the Proposed Development and include for example, planting around the CSEC/THH, in-situ planting such as replacement of hedgerows and boundaries post construction and tree replacement and planting, all within the Order Limits.</p> <p>Secondary measures fall under the umbrella of 'enhancement' as these cannot be guaranteed. Enhancement measures have been considered separately to the EIA as these would be undertaken by voluntary agreement; such measures include consideration of wider landscape enhancement e.g. restoration of boundaries such as cloddiau not directly affected by the Proposed Development and planting of trees and woodland in the wider landscape. In addition, planting would be offered to residential receptors in the form of a Voluntary Residential Planting Scheme (VRPS). This would include the offer of planting to reduce/ minimise visual effects for eligible properties identified during the assessment.</p> <p>Enhancement measures along with the VRPS are presented in the Enhancement Strategy (Document</p> |

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| | | | 7.13) , a draft of which was provided to IACC prior to submission of the DCO for comment. |
| 9.4 ON AND OFF-SITE REPLACEMENT PLANTING (Chapters 6 & 7. Also relevant to Chapters 8 & 9) | Due to the nature of the works, trees and hedgerows will need to be removed to accommodate the construction and operation of the proposed development. | IACC 9.7 | This comment is noted. |
| | In situ replacement planting as mitigation should be the first priority. This should take the form of like for like replanting of hedgerows and trees within the order limits. Where an overgrown hedgerow or line of trees needs to be removed, but for operational reasons cannot be replaced in situ, hedgerow or scrub planting should be used to reinstate the linear feature in situ. | IACC 9.8 | Mitigation in the form of reinstatement is included within the CEMP (Document 7.4) and shown on Figure 1 Reinstatement Plans (Document 7.4.1.1). |
| | Where, for operational reasons, in situ replanting of hedgerows and trees is not possible within the order limits, off site replacement planting should be carried out as close to the site of loss as possible. This is likely to require 3rd party landowner agreement. In order for as much replacement planting as possible to be secured ensuring it can be classed as mitigation, landowner agreement should be sought by National Grid as early as possible. Commentary should include opportunities for advance planting, provenance and supply of plant stock. | IACC 9.9 | <p>Mitigation in the form of reinstatement is included within the CEMP (Document 7.4) and shown on Figure 1 Reinstatement Plans (Document 7.4.1.1).</p> <p>Figures 7.12-7.16 Landscape Mitigation Proposals (Document 5.7.1.12-5.7.1.16) present more detailed information on specification of proposed mitigation planting.</p> <p>These embedded mitigation measures have been assessed as part of the Proposed Development and include for example, planting around the CSEC/THH, in-situ planting such as replacement of hedgerows and boundaries post construction and tree replacement and planting, all within the Order Limits.</p> <p>Secondary measures fall under the umbrella of 'enhancement' as these cannot be guaranteed. Enhancement measures have been considered separately to the EIA as these would be undertaken by voluntary agreement; such measures include consideration of wider landscape enhancement e.g. restoration of boundaries such as cloddiau that are not directly affected by the Proposed Development</p> |

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| | | | <p>and planting of trees and woodland in the wider landscape. In addition, planting would be offered to residential receptors in the form of a Voluntary Residential Planting Scheme (VRPS). This would include the offer of planting to reduce/ minimise visual effects for eligible properties identified during the assessment.</p> <p>Enhancement measures along with the VRPS are presented in the Enhancement Strategy (Document 7.13), a draft of which was provided to IACC prior to submission of the DCO for comment.</p> |
| 9.5 RESIDENTIAL AMENITY ASSESSMENT (Chapters 6 and 7. Also relevant to Chapters 8 and 9 including Chapter 18 - Intra-Project Effects) | Paragraph 8.1.3 of Chapter 7 explains that the methodology for the assessment of residential amenity was included at appendix 5.2 of the Scoping Report. | IACC 9.10 | <p>This comment is noted.</p> <p>The methodology for the Residential Visual Amenity Assessment can be found in Section 4 of Chapter 8, Visual Assessment (Document 5.8).</p> |
| | The IACC expects to be consulted on the draft ES, including outcomes of assessment and appropriate mitigation measures. Reference must be made to the wider health impact assessment for the project when considering potential impacts on health associated for example, intra- project effects during construction relating to air quality, traffic and noise disturbance. | IACC 9.11 | <p>National Grid shared a draft ES with IACC, receiving detailed comments which were able to be considered and taken in to account where appropriate in finalising the ES.</p> <p>Intra-Project Effects are set out Chapter 19 (Document 5.19).</p> <p>Wider health issues are presented in the WBR (Document 5.27).</p> |
| ECOLOGY AND NATURE CONSERVATION (Chapter 8) | | | |
| 10.1 Menai Strait & Conwy Bay SAC | The PEIR confirms that a tunnelled solution is being taken forward for the crossing of the Menai Strait; overall this avoids many ecological impacts, including those that could affect the SAC. However, there are still potential impacts associated with the construction of a tunnel. In the absence of suitable mitigation, adequately demonstrated by a project level Habitats Regulation | IACC 10.1 | Potential effects on Annex I habitats and other features as a consequence of tunnel construction have been addressed (partly based on modelling outputs) in ES Chapter 9 Ecology and Nature |

| Table 1: Isle of Anglesey County Council | | | |
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| | Assessment (HRA), there is a risk that these impacts could have a significant adverse effect on this internationally important site, notably the Annex 1 habitats present such as marine reefs. | | Conservation (Document 5.9) and Habitat Regulations Assessment Report (Document 5.23). The requirement to comply with the Habitats Regulations was identified at the commencement of the design process. This requirement has been taken into account during the design process and face to face engagement with stakeholders has been undertaken. |
| | At this stage, the PEIR includes no detailed mitigation measures for the SAC; whilst the PEIR states that the predicted magnitude of effect is very low, until proposals are developed further this cannot be confirmed. It should be noted that no draft HRA has been included with the PEIR information pack. The Council would expect to receive a draft of this document when available and consult with Natural Resources Wales to ensure mitigation measures set out are adequate. The Council expects that an appropriate assessment will be required. | IACC 10.2 | Potential effects on Annex I habitats and other features as a consequence of tunnel construction have been addressed in the ES and Habitat Regulations Assessment Report (Document 5.23). If the need for mitigation is identified, this has been detailed. Noted. The requirement to comply with the Habitats Regulations was identified at the commencement of the design process. This requirement has been taken into account during the design process and face to face engagement with stakeholders has been undertaken. |
| 10.2 Anglesey Fens SAC | The PEIR indicates that, in the absence of mitigation, a range of adverse / negative impacts could occur to the Anglesey Fens SAC, including direct habitat loss and changes to hydrology. Baseline surveys are ongoing and no detailed results are presented in the PEIR to allow full risk quantification. In the absence of suitable mitigation, adequately demonstrated by a project level Habitats Regulation Assessment (HRA), there is a risk that these impacts could have a significant adverse effect on this internationally important site on Anglesey. | IACC 10.3 | Noted. Potential effects have been addressed within the ES and project level HRA Habitat Regulations Assessment Report (Document 5.23). The requirement to comply with the Habitats Regulations was identified at the commencement of the design process. This requirement has been taken into account during the design process and face to face engagement with stakeholders has been undertaken. |
| | It is understood from conversations with National Grid's representative during the site visit on 13th October 2016 that direct impacts are likely to be limited to tree pruning, but this needs confirmation along with detailed proposals as to how hydrological impacts will be avoided during the construction of the OHL near the SAC. It should be noted that no draft HRA has been included with the PEIR information pack. The IACC would expect to see the draft of this | IACC 10.4 | Noted. Potential effects have been addressed within the ES and project level HRA Habitat Regulations Assessment Report (Document 5.23), a draft copy of which was issued to Stakeholders for review. The requirement to comply with the Habitats Regulations |

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| | document when available in order to consult with Natural Resources Wales (NRW) to ensure the mitigation measures set out are adequate. There must be no significant negative effect on the integrity of the SAC as a result of this project, either alone or in combination. | | was identified at the commencement of the design process. This requirement has been taken into account during the design process and face to face engagement with stakeholders has been undertaken. |
| 10.3 Impacts to County Wildlife Sites and Section 42 Priority Habitats | The PEIR identifies that various impacts, including direct habitat loss, will occur to County Wildlife Sites (CWSs) and Section 42 priority habitats (Environment Act Wales 2016) as a result of the proposed project. The Council notes that baseline surveys are ongoing and no detailed results are presented in the PEIR to allow for a complete analysis of the impacts. In the absence of suitable mitigation, there is a risk that habitat losses and degradation as a consequence of the scheme could have a significant adverse effect on important habitats on Anglesey. | IACC 10.5 | The impacts that have been identified and their effects have been addressed within Chapter 9, Ecology and Nature Conservation (Document 5.9) of the ES, together with associated mitigation measures where appropriate. |
| | The ES should contain full baseline results, including quantitative calculations of habitat loss / degradation which should form the basis for the mitigation and enhancement proposed. The IACC requires that losses of habitats within CWSs are adequately mitigated and consider asking for a financial contribution from the applicant in line with the approach taken for National Grid's Hinkley C Connection Project. This must be kept under review as National Grid's proposals take shape. | IACC 10.6 | This has been addressed within Chapter 9, Ecology and Nature Conservation (Document 5.9) of the ES and its associated appendices. |
| 10.4 Impacts to legally protected and Section 42 Priority Species | The PEIR identifies that various impacts, including species mortality and injury, may occur to legally protected species such as great crested newts, reptiles, badger and bats, along with Section 42 priority species (Environment Act Wales 2016) as a result of this project. The Council notes that baseline surveys are ongoing and no detailed results are presented in the PEIR to allow full risk quantification. In the absence of suitable mitigation, there is a risk that these impacts could have a significant adverse effect on important populations of fauna on Anglesey. | IACC 10.7 | This has been addressed within ES Chapter 9, Ecology and Nature Conservation (Document 5.9) and its associated appendices. |
| | The ES should contain full baseline results, including detailed accounts of ongoing faunal surveys which should form the basis for the mitigation and enhancement proposed. In particular, National Grid should provide detailed proposals for European Protected Species (great crested newts and bats in particular which may be of regional importance) where impacts are predicted and development licences will be required. | IACC 10.8 | This has been addressed within ES Chapter 9, Ecology and Nature Conservation (Document 5.9) and its associated appendices, where full baseline results have been provided. |
| 10.5 Bird collisions with overhead lines / structures | The PEIR includes reference to potential collision risk for birds hitting wires, notably Whooper Swans associated with Llyn Alaw SSSI and other wetland species. The Council notes that baseline surveys are ongoing and no detailed results are presented in the PEIR to allow for a complete analysis of the impacts. In the absence of suitable mitigation, there is a risk that birds, | IACC 10.9 | This has been addressed within ES Chapter 9, Ecology and Nature Conservation (Document 5.9) and its associated appendices, where full baseline results have been provided. Stakeholder |

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| | including those that form populations of national significance that use habitats on Anglesey on a regular basis, could be adversely impacted by the project. | | engagement meetings have also been conducted to discuss this issue prior to completion of the ES. |
| | The ES should contain full baseline results, modelling of impacts where possible and assessment of effects in the absence of fitting flight diverters on OHLs. If this suggests that there is potential for significant collision risk for key species, National Grid should adopt precautionary mitigation in line with latest guidance (SNH, 2016) and National Grid's protocols for fitting flight diverters to protect key populations of birds on Anglesey. | IACC 10.10 | This has been addressed within ES Chapter 9, Ecology and Nature Conservation (Document 5.9) and its associated appendices, where full baseline results have been provided. |
| 11.0 HISTORIC ENVIRONMENT (Chapter 9) | | | |
| 11.1 Baseline (linked to Chapters 6&7) | The baseline conditions in the PEIR have been informed by a desk based assessment (existing datasets, aerial photographic interpretation, and LiDAR analysis), and a walkover survey. This information has been used in part to inform the locations for proposed pylons and compounds. However, the potential for significant archaeological remains to be present within these areas is not known due to the absence of field surveys (geophysics and trial trenching). | IACC 11.1 | Geophysical Survey has been completed over a survey area agreed with Gwynedd Archaeological Planning Service (GAPS) and the report on the results is included within the ES Chapter as Appendix 10.2 (Document 5.10.2.2). Trial trenching has also been completed, with trench locations also agreed with GAPS. The report on the results is included within the ES Chapter as Appendix 10.7 (Document 5.10.2.7). |
| | In the event that significant archaeological deposits are present, National Grid has stated that pylon locations could be relocated to avoid these impacts; however, this could introduce additional setting and LVIA impacts as a result. Re-location of pylons will be restricted by the Limits of Deviation (LoD) applied for within the DCO; however, longitudinal movement along the route alignment could be accommodated within the LoD, but compromise the 'pairing' of pylons from a landscape and visual perspective. Therefore, it is vital that these surveys are undertaken at the earliest opportunity and prior to submission of the DCO application to enable combined effects to be considered, assessed and mitigated appropriately. | IACC 11.2 | Geophysical Survey has been completed over a survey area agreed with Gwynedd Archaeological Planning Service (GAPS) and the report on the results is included within the ES Chapter as Appendix 10.2 (Document 5.10.2.2). Trial trenching has also been completed, with trench locations also agreed with GAPS. The report on the results is included within the ES Chapter as Appendix 10.7 (Document 5.10.2.7). In some locations the LOD has been restricted where pylon movements would result in a change to the LVIA effects. |

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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>A programme of archaeological surveys must be undertaken at the earliest opportunity, to consist of:</p> <ul style="list-style-type: none"> Geophysical survey of all pylon locations, proposed compounds and associated construction areas where excavation would be required (haul roads etc.) Trial trenching of identified anomalies and 'blank' areas to characterise the archaeology and test the effectiveness of the geophysical survey. Review pylon locations against survey findings; where necessary relocate pylons and re-assess (historic environment and LVIA). Additional surveys may be required for proposed relocation areas. Review impacts in construction areas and compounds and avoid impacts by design where possible. Assess impact following design review, and propose mitigation. | IACC 11.3 | <p>Geophysical Survey has been completed over a survey area agreed with Gwynedd Archaeological Planning Service (GAPS) and the report on the results is included within the ES Chapter as Appendix 10.2 (Document 5.10.2.2). Trial trenching has also been completed, with trench locations also agreed with GAPS. The report on the results is included within the ES Chapter as Appendix 10.7 (Document 5.10.2.7).</p> <p>The information obtained during these surveys has been used to assess effects on the identified remains and disturbance to these avoided where possible.</p> |
| 11.2 Baseline (General) | <p>In paragraph 1.1.5 of the PEIR, National Grid state the purpose of the Chapter is to:</p> <ul style="list-style-type: none"> Summarise the historic environment baseline; Identify those heritage assets for which the Proposed Project would give rise to potentially significant effects during the construction, operation or decommissioning stages; Identify initial measures that may be adopted to mitigate these effects; Consider residual effects to the historic environment; and Establish any survey or desk based work that would still be required as part of the EIA the results of which will be included in the ES. | IACC 11.4 | Noted. |
| | <p>The baseline is incomplete due to a limited amount of survey across the area and the lack of historic asset and setting evaluation to date. Not all heritage assets likely to give rise to significant effects have been identified and those which have been identified as potentially significant require further evaluation to establish their significance and the likely effects on them and their respective settings.</p> | IACC 11.5 | <p>Geophysical Survey has been completed over a survey area agreed with Gwynedd Archaeological Planning Service (GAPS) and the report on the results is included within the ES Chapter as Appendix 10.2 (Document 5.10.2.2). Trial trenching has also been completed, with trench locations also agreed with GAPS. The report on the results is</p> |

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| | | | <p>included within the ES Chapter as Appendix 10.7 (Document 5.10.2.7).</p> <p>Further analysis of the settings of assets has also been completed, and this baseline description is included as Section 7.5 of ES Chapter 10 Historic Environment (Document 5.10).</p> |
| | Sites where there is potential adverse impact created by the proposed line on an assets setting or on its important outward view(s) will require a detailed evaluation to inform the scope and extent of any proposed mitigation. Enhancements should be considered wherever there is an unmitigated residual impact, for example, a setting impact which would not be appropriate to mitigate through screening, and also wherever there are opportunities to strengthen landscape or historic asset character, reinforce a sense of place or shift the visual emphasis away from the overhead infrastructure. | IACC 11.6 | <p>Assessment of effects on the settings of assets has been completed and is included as Section 9.5 of ES Chapter 10 Historic Environment (Document 5.10).</p> <p>Opportunities for enhancement are identified in the Enhancement Strategy (Document 7.13), a draft of which was provided to IACC and GAPS prior to submission of the DCO for comment.</p> |
| | A programme of staged archaeological investigation needs to progress to establish the significance of currently undesignated monuments which might be of National Importance and also to evaluate areas of archaeological potential to determine whether similar remains might be impacted upon which have not currently been identified. A programme of magnetometer survey and intrusive archaeological trial trenching needs to be agreed and in some cases topographic survey. This work needs to inform decision making as well as informing appropriate mitigation. | IACC 11.7 | Geophysical Survey has been completed over a survey area agreed with Gwynedd Archaeological Planning Service (GAPS) and the report on the results is included within the ES Chapter as Appendix 10.2 (Document 5.10.2.2). Trial trenching has also been completed, with trench locations also agreed with GAPS. The report on the results is included within the ES Chapter as Appendix 10.7 (Document 5.10.2.7). |
| 11.3 Viewpoint Assessment. | National Grid state in paragraph 6.3.4 – ‘The Viewpoint Assessment given in the Visual Impact Chapter shall be incorporated into the assessment of setting impact in order to refine those assets where there are currently potential significant effects’. | IACC 11.8 | The proposed scope of the settings assessments was provided to consultees in July 2016 and responses provided in August 2016. The scope was amended to reflect these comments and some additional photomontages for the purposes of the historic environment assessment were identified on the basis of these consultee comments. These photomontage are included in the ES as Document 5.29 . |

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| | | | The Viewpoint Assessment is presented in Appendix 8.2 (Document 5.8.2.2) and photomontages in Photomontages (Document 5.29). |
| | A detailed and selective setting assessment is urgently needed to refine those assets where there are currently potential significant residual effects (as identified in table 9.19 and as might be identified through field evaluation). However, the viewpoints in the Visual Impact Assessment do not appear to meet the needs of the setting impact assessment and should not therefore simply be embedded within any setting assessment. | IACC 11.9 | As noted above, additional photomontages for the purposes of the historic environment assessment were identified on the basis of these consultee comments. These photomontage are included in the ES as Document 5.29 . Views of from other historic assets are also shown in a number of wireframe illustrations (Documents 5.8.2.2 and 5.10.2.8). |
| | Bespoke visualisations will need to be created to illustrate the way the proposals might impact on particular elements of the settings of historic assets by preparing photomontages from, towards and where appropriate between assets. This is particularly important for sites where there is obvious inter-visibility e.g. views between AN080 and AN110; where one monument has influenced the siting of another e.g. the relationship between AN080 and LB 5349. | IACC 11.10 | The ES includes a number of photomontages (Document 5.29) illustrating views of and from historic assets. Photomontage A8 (Document 5.29) shows the view from monument AN030 across to AN110, including the location of AN080, whilst Photomontage A10 illustrates the view back from AN110 across the location of AN080 to AN030, and Photomontage A9 illustrates the view from near to AN080, looking along the line of the OHL and including the location of AN110. Due to intervening topography, AN080 and LB 5349 (the Grade II Listed Church of St Peirio) are not intervisible and there is no direct visual relationship between these which could be shown in a visualisation. Other photomontages showing the view of or from historic assets include Photomontage A12 from Bodewryd next to the Church of St Mary (LB 5348), Photomontage C6 from the Church of St Michael (LB 5390), Photomontage E6 from AN002 and Photomontage F3 from within Vaynol Registered Park and Garden. |

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| | | | Views of from other historic assets are also shown in a number of wireframe illustrations (Documents 5.8.2.2 and 5.10.2.8). |
| 12.0 GEOLOGY, HYDROGEOLOGY AND GROUND CONDITIONS (Chapter 10) | | | |
| 12.1 Groundwater (Preliminary Assessment of Effects) | With the good site practice mitigation measures outlined in the Construction and Environmental Management Plan (CEMP) (Appendix 4.1) in place, the effects on uncontaminated strata and construction worker health is considered by National Grid to be Negligible (not significant) as spillages will be unlikely and if they did occur they would be managed so not posing a risk to human health and localised effects on soils and geology repairable. However, the effect on groundwater is considered to be Minor Adverse (not significant) based on a low magnitude of predicted effect. The IACC highlights the presence of groundwater receptors of high importance within some areas of the Proposed Project Boundary. Therefore, whilst it is the very low risk of a leak or spillage that limits the significance, it is imperative that robust control measures are in place to ensure that effects are mitigated. National Grid should be aware of the implication of the Environmental Damage Regulations 2009 for any spills: http://gov.wales/topics/environmentcountryside/epq/environmental-damage-regulations/?lang=en | IACC 12.1 | Control measures are included in the CEMP (Document 7.4). |
| | As set out at Scoping, the commitments to pollution control, inspections and incident procedures including a Pollution Incident Control Plan are welcomed by the IACC. It is expected that these measures are developed in consultation with Natural Resources Wales (NRW) and secured by way of DCO Requirement. | IACC 12.2 | The Pollution Incident Control Plan (PICP) has been developed with consultation with NRW. The PICP is secure by Requirement 7 of the DCO (Document 2.1). |
| 12.2 Tunnels and Associated shafts (Preliminary Assessment of Effects) | It is unclear from the PEIR how much rock spoil / material will be generated, its material / mineral properties and where it will be landed, i.e. at Anglesey, on the mainland or both sides if two tunnel boring machines are used. This needs to be established if TBM or SCL tunnelling methods are to be used. | IACC 12.3 | There are three scenarios for tunnel construction, these are: <ul style="list-style-type: none"> Scenario 1 –TBM from Braint to Tŷ Fodol; Scenario 2 – TBM from Tŷ Fodol to Braint; and Scenario 3 – Drill and Blast from both shafts. All three scenarios have been considered within the Environmental Impact Assessment (EIA) as |

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| | | | <p>explained in ES Chapter 6, EIA Methodology (Document 5.6).</p> <p>Generation of arisings and materials management are discussed within the CEMP (Document 7.4), Outline Materials Management Plan (Document 7.12) and within Chapter 4 Construction, Operation, Maintenance and Decommissioning of the Proposed Development (Document 5.4).</p> |
| | The sections related to the construction and decommissioning of the tunnel should also refer to the excavation material and fill material arising from the tunnel and required to backfill the tunnel. In particular the storage, albeit temporary of the arisings and fill will need to be stored in such a way as to address potential impacts on the existing soils and groundwater. | IACC 12.4 | The potential effects derived from storage of arisings and fill are discussed under Section 8 Potential Effects of ES Chapter 11 Geology Hydrogeology and Ground Conditions (Document 5.11). |
| | The ES will need to address the recovered use and disposal of the considerable amount of spoil arising as a result of the construction of the tunnel. Spoil could be used (recovered) as part of a mitigation scheme and also be considered a part of the proposed development, giving rise to its own environmental effects, depending on how it is disposed of / utilised. | IACC 12.5 | <p>Suitable facilities and sites have been identified on Anglesey and in North Wales for the recovery, recycling and disposal of tunnel spoil. These activities would be accommodated within the approved environmental management and mitigation strategies appropriate for each site.</p> <p>This is addressed in section 9 mitigation and residual effects of Chapter 11, Geology, Hydrogeology and Ground Conditions (Document 5.11). Further information is provided in the OMMP (Document 7.12).</p> |
| | Based on internal officer calculations the size of the shaft and tunnel a basic calculation establishes a figure of 8,766 m3 of material from the shaft construction and 62,840m3 from tunnelling. Tunnelling is to be undertaken over a 3 year period and therefore in quarrying terms this does not account to substantial amounts of material and would in all probability be utilised within the overall development. Further studies and assessment are required of the tunnelling methodology, spoil disposal options to ensure that appropriate mitigation can be provided, transport from the tunnels, off-site disposal, reuse, and the effects on the existing aggregate industry within the area. | IACC 12.6 | <p>The majority of tunnel spoil would not be utilised for the construction works and would be taken off site for use elsewhere at suitable facilities identified in the region. The effects on the existing aggregates industry have been considered in the context of the likely options for the tunnel spoil.</p> <p>This is addressed in section 9 mitigation and residual effects of Chapter 11, Geology, Hydrogeology and Ground Conditions (Document</p> |

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| | | | 5.11). Further information is provided in the OMMP (Document 7.12). |
| | National Grid states that 'Materials Management Plan (MMP) will be developed to ensure that spoil removed from the launch site during the excavation of the tunnel is removed from site appropriately. It is suggested that a MMP addresses broader issues than spoil/material removal from the tunnel excavations. The provision of the MMP is welcomed, and the IACC seek the establishment of a Materials and Waste Management Steering Group between relevant stakeholders to address waste and material management associated with the construction, operation, maintenance and decommissioning of the proposed project prior to submission of the DCO application. | IACC 12.7 | <p>A Materials and Waste Management Steering Group has been established and met on a number of occasions to discuss the details prior to submission of the DCO application. Please refer to Chapter 5, EIA Consultation (Document 5.5).</p> <p>An OMMP (Document 7.12) is included with the application. A draft OMMP was provided to IACC for comment prior to submission of the DCO for comment.</p> |
| | Such a management plan should be submitted in draft as one of the application documents addressing the volume, geology and time frame for extraction of tunnel arisings and suitability for use within the overall project, material for construction of temporary haul roads, concrete, compound surfacing etc. The MMP will also need to address the end use / disposal of material utilised as part of the temporary haul roads, compounds that form the overall project. The storage of arisings will also need to be addressed within the LVIA if large stockpiles of material are to be stored on site (This should be considered within chapter 18 - Intra- project effects). | IACC 12.8 | <p>The OMMP (Document 7.12) has been submitted as part of the DCO application and considers the project life cycle of the materials required temporarily and their subsequent removal and end use.</p> <p>A draft OMMP was provided to IACC for comment prior to submission of the DCO for comment.</p> <p>Consideration of the effects of the storage of arisings/stockpiles of material are considered in the assessment of construction effects in both ES Chapter 7, Landscape Assessment (Document 5.7) and Chapter 8, Visual Assessment (Document 5.8).</p> |
| | Within the MMP a materials balance exercise should be undertaken in estimating the amount of aggregate and waste generated within the scheme against the required aggregate for the development. In doing so the IACC can engage with National Grid in identifying sources and providers of aggregates and mineral materials together with potential sites for processing of waste and storage of stockpiles on Anglesey, Gwynedd, North Wales in the scheme's development. (This should be considered within chapter 19, Inter-project effects). Such consideration will also need to be addressed within Chapter 4 - Construction, Operation, Maintenance and Decommissioning of the proposed project. | IACC 12.9 | <p>The comment is noted and the matters have been addressed in the appropriate chapters.</p> <p>A Materials and Waste Management Steering Group has been established and met on a number of occasions to discuss the details prior to submission of the DCO application. Please refer to Chapter 5, EIA Consultation (Document 5.5).</p> <p>An OMMP (Document 7.12) is included with the application. A draft OMMP was provided to IACC for</p> |

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| | | | comment prior to submission of the DCO for comment. |
| 13.0 WATER QUALITY, RESOURCES AND FLOOD RISK (Chapter 11) | | | |
| 13.1 Water resources receptors | In paragraph 3.3.7 National Grid state: "Water resources receptors are defined within this assessment as surface water abstractions and their associated upstream catchment". | IACC 13.1 | See below. |
| | It is important for National Grid to include Ground Water (GW) receptors and the text elsewhere implies that records of GW abstractions have been requested from NRW/LAs. It is important for groundwater to be referenced and included in other chapters- e.g. in the hydrogeology chapter. | IACC 13.2 | The effects associated with groundwater abstractions are addressed in Chapter 11 Geology, Hydrogeology and Ground Conditions (Document 5.11). |
| | National Grid should obtain groundwater abstraction data and cover groundwater as a potential receptor as part of the assessment or refer to where this is detailed elsewhere. National Grid must acknowledge the risk that not all private supplies may be registered and the need to consult landowners potentially affected. | IACC 13.3 | <p>National Grid's team has engaged with landowners and tenants during the development of the Proposed Development. Land interest information was requested from Major Land Owners (MLO) including Local Authorities and Statutory Undertakers and other landowners with multiple land ownerships, through letter and email requests for information.</p> <p>The effects associated with groundwater and groundwater abstractions are addressed in Chapter 11 Geology, Hydrogeology and Ground Conditions (Document 5.11). Private water supplies identified are included in ES Appendix 11.6 (Document 5.11.2.6)</p> |

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| 13.2 Magnitudes of effect and Mitigation | Tables 11.20 -11.24 includes detail on magnitude of effects for - overhead line, third party underground services, tunnel, THH/SECs and substations. | IACC 13.4 | N/A |
| | Effects and mitigation options have been seemingly discounted within the document at an early stage, without the provision of evidence to support the conclusions drawn. The IACC would expect to see evidence to support the assessment of the significance of effects reported in Sections 5.2 to 5.6. As a minimum, this should be provided through the Water Framework Directive (WFD) assessment and Flood Consequence Assessments. It seems premature to assess the potential effect without these assessment completed as a minimum. This has been identified as an issue to avoid scoping out potentially significant effects and to ensure transparent and robust decision making. | IACC 13.5 | Further detail has been provided in Section 9 of ES Chapter 12 Water Quality, Resources and Flood Risk (Document 5.12) within the assessment of residual effects. This has included an assessment of site specific infrastructure including proposed tracks, pylons and crossings and their hydrological connectivity to individual surface water receptors. This approach has also been adopted in the FCA and WFD Appendices 12.1-4 (Document 5.12.2.1-4) and 12.5 (Document 5.12.2.5) respectively. The CEMP (Document 7.4) provides mitigation measures, which would be secured through DCO Requirement 6. |
| 13.3 Control and Management Measures (CMM) and Mitigation by Design (DMM) | In Table 11.18, the mitigation by Design Measures due to changes to watercourse morphology as a result of works in or near watercourses (e.g. installation of watercourse crossings) should also include potential mitigation required, including compensatory measures, due to any deterioration in WFD hydromorphological supporting elements, e.g. due to culvert crossings. | IACC 13.6 | Mitigation by design presented in Section 9.1 has reduced the number of watercourse crossings and avoided the loss of WFD habitat. Further mitigation is also included in Table 12.20 (Document 5.12) and the CEMP (Document 7.4) which is secured through DCO Requirement 6. Measure FM12 specifically would help manage effects from watercourse crossings to an acceptable level, as reported in the WFD Assessment in Appendix 5 (Document 5.12.2.5). FM12 includes a requirement for all crossing structures to be covered by Flood Risk Activities Permit (FRAP) and Ordinary Watercourse Consents (OWC) as appropriate, to comply with the WFD. |
| | The mitigation by Design Measures due to volumetric displacement of flood water associated with the construction of temporary spoil mounds, access tracks and temporary spoil mounds also needs to include potential mitigation required, including compensatory measures, due to any loss of floodplain. This is applicable to associated proposed infrastructure of OHL and third party services and also THH/SECs and Substations. This has been identified to allow for | IACC 13.7 | Mitigation is included in Table 12.20 (Document 5.12) and the CEMP (Document 7.4) as secured through DCO Requirement 6. Measures FM15-17 provides mitigation to manage the displacement of flood water associated with the construction of temporary spoil mounds. Other measures have |

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| | compensation for loss/localised deteriorations in WFD quality elements and/or any loss of floodplain resulting from spoil heaps or raised access tracks in floodplain areas. | | been provided in WE51-53 for the sustainable drainage of infrastructure along the Proposed Development. |
| 14.0 TRAFFIC AND TRANSPORT (Chapter 12) | | | |
| 14.1 Menai Strait Crossing (Cross reference with the Menai Strait Crossing Report (Chapter - Construction Consideration, other infrastructure). | National Grid state that 'As plans for a potential third bridge across the Menai Strait become more defined National Grid will continue to review its proposals. At this time the Third Menai Bridge project is still not confirmed and until there is a final design, with funding and consents confirmed, National Grid are required to progress with its current plans to connect the Wylfa connection'. | IACC 14.1 | This remains the case. |
| | Anecdotal evidence and traffic data suggests that the Britannia Bridge is a pinch point on the A55 and at peak periods (westbound am and eastbound pm), during summer months, or when the ferry has disembarked at Holyhead, this has considerable traffic implications on the Britannia Bridge. This is the only section of the E22 Euro Route which is single carriageway and therefore this is already a concern without this issue being further compounded by traffic generated by the proposed Wylfa Newydd and National Grid projects. Additionally, during adverse weather conditions or severe accidents, this also has a significant impact on both the Britannia Bridge and Menai Bridge (diversion route) where the bridges may be closed to high sided vehicles. This raises significant concerns with regards to resilience due to the closure of the bridges. | IACC 14.2 | ES Chapter 13 Traffic and Transport (Document 5.13) and the Transport Assessment (TA) (Document 5.13.2.1) provide detail on the construction vehicle activity associated with the Proposed Development and the impact on key routes, including the A55 Britannia Bridge. The project team is aware of the occasional closures to the bridge to high-sided vehicles and, less frequently, to all traffic and has ensured resilience against this. Site working areas would have the ability to store vehicles and construction traffic would adhere to measures included in the Outline Construction Traffic Management Plan (OCTMP) (Document 7.5). |
| | From an Emergency Planning perspective and linked to impacts on traffic congestion the influx of site traffic could increase the incidence of traffic congestion within the "incident management area" around both Britannia & Menai Suspension Bridge during periods of high winds and the implications of stacking any vehicles unable to cross. The accumulation of both National Grid and Wylfa Newydd traffic could become a significant factor in the event of any incident affecting the road network and has the potential to hinder the emergency response. | IACC 14.3 | Chapter 13 of the Environmental Statement (Document 5.13) and the Transport Assessment (TA) (Document 5.13.2.1) will provide detail on the construction vehicle activity associated with the Proposed Development and the impact on key routes, including the A55 Britannia Bridge. The project team is aware of the occasional closures to |

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| | <p>Local authorities are Category 1 responders with a statutory duty under the Civil Contingencies Act 2004 to undertake risk assessments and plan for emergencies. As part of this requirement IACC must, as the Local Authority with statutory responsibility for emergency planning, assist in the preparation of any relevant multi-agency response plans required during the construction phase</p> <p>The role of the IACC, coordinated by Strategic Co-ordination Centre, in response to an emergency is as follows:</p> <ul style="list-style-type: none"> to support the emergency services including attendance at the strategic level of multi-agency control (known as the Strategic Co- ordination Centre) and / or the tactical level of control (known as the Tactical Control Centre); and to provide humanitarian assistance to the affected local community (local residents, visitors to the local area and road users caught up in the events). <p>The operator will be required to provide a Traffic Management Area Plan. National Grid should arrange for all site bound traffic and traffic leaving the site in the immediate are of Britannia Bridge to be moved to a 'place of safety' if any restrictions are in operation on traffic movement across Britannia Bridge; National Grid would also be required to provide positive control of the movement of site traffic during any such incident in order to:</p> <ul style="list-style-type: none"> Arrange to contact suppliers to cancel/postpone deliveries; and Arrange to stop or modify the movement of construction worker traffic to and from National Grid Sites | | <p>the bridge to high-sided vehicles and, less frequently, to all traffic and has ensured resilience against this. Site working areas will have the ability to store vehicles and construction traffic will adhere to measures included in the OCTMP (Document 7.5).</p> |
| | <p>National Grid need to work closely with the IACC, Gwynedd Council, Welsh Government, Horizon Nuclear Power and other public sector partners (such as North Wales Police) to fully assess the potential impacts on the Britannia Bridge and consider if National Grid apparatus could be accommodated in a third crossing, with significant efficiencies (potentially including commercial efficiencies) for all parties.</p> | IACC 14.4 | <p>Chapter 13 of the Environmental Statement (Document 5.13) and the Transport Assessment (TA) (Document 5.13.2.1) will provide detail on the construction vehicle activity associated with the Proposed Development and the impact on key routes, including the A55 Britannia Bridge. Extensive consultation has been undertaken with the local highway authorities and feedback from the emergency services has helped to inform the proposed construction traffic routes.</p> <p>National Grid has worked, and continues to work, closely with Welsh Government on their plans for a</p> |

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| | | | <p>third crossing at the Menai Strait. Welsh Government officials are keen to understand if it's possible for a bridge to carry the new electrical connection needed for Wylfa Newydd. As part of this, Welsh Government has commissioned National Grid to undertake a feasibility study into potential options to use the bridge.</p> <p>There are a lot of things to consider before National Grid and Welsh Government will be able to understand if putting cables of the size required for the new electrical connection on a new bridge is possible. To our knowledge, there are no high voltage transmission cables on a bridge anywhere in the world. Costs, technical considerations, route on and off the bridge and timing are just some of the things to be worked out.</p> <p>In addition, any proposal for a third Menai crossing put forward by Welsh Government needs to be consented and funded before it can go ahead.</p> <p>At the same time, it's vital that National Grid is able to deliver a connection for Horizon in the mid-2020s, when it is expected that Wylfa Newydd would start generating. This is why National Grid is continuing with the plans for a tunnel under the Menai Strait. When completed, the feasibility findings will be considered and next steps agreed.</p> |
| 14.2 Construction Traffic Management Plan (CTMP) | <p>The IACC raise a number of concerns with the CTMP, namely:</p> <ul style="list-style-type: none"> The use of unsuitable roads to transport goods, materials and workers during the construction phase of the project. The likelihood of significant increase in uncontrolled traffic numbers using Class II, III and unclassified roads to access different bellmouths along the OHL route. | IACC 14.5 | <p>The construction route strategy and the OCTMP (Document 7.5) has been substantially revised to account for comments from IACC Highways throughout the development of the project.</p> <p>Construction routes have been identified based on feedback from the local highway authority. In addition, the temporary access track has been extended from the S42 scheme in order to provide</p> |

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| | <ul style="list-style-type: none"> This would lead to issues such as road safety concerns, increase in potential vehicle collisions, increase in traffic congestion, speeding concerns, edge of carriageway damage, etc. | | <p>opportunities to reduce the amount of construction traffic on the local highway network and mitigate potential effects.</p> <p>The Transport Assessment (Document 5.13.2.1) considers the potential for increased road traffic collisions. Multiple junctions on the local highway network have been assessed for capacity and delay.</p> <p>The OCTMP (Document 7.5) and the design of the Proposed Development include a range of measures to help offset impacts associated with the increased construction activity.</p> |
| | National Grid will need to submit a comprehensive and robust Construction Traffic Management Plan to the IACC for review and approval prior to inclusion in the Environmental Statement (ES). | IACC 14.6 | The OCTMP (Document 7.5) has been submitted to IACC and other stakeholders at regular stages during the project. A draft OCTMP was included at the S42 stage. A revised draft OCTMP following stakeholder consultation and project design development was also reissued for comment in April 2018. Comments from IACC (and other stakeholders) have been considered throughout. |
| 14.3 Transport Assessment (Methodology) | National Grid state that: Rule 1: include highway links where total traffic flows are predicted to increase by more than 30% (or where the number of HGVs is predicted to increase by more than 30%'. Despite certain links having a relatively small overall increase in traffic volume, the IACC considers the percentage increase in HGV traffic during working hours very significant. The traffic flow increase should be assessed as an hourly increase in HGV traffic, rather than the vehicle Annual Average Daily Traffic (AADT). | IACC 14.7 | Chapter 13 of the ES (Document 5.13) includes within the assessment consideration of all traffic links identified as construction traffic routes for the Proposed Development. Increases in traffic on these links are presented and assessed using a range of temporal measures. ES Chapter 13 Traffic and Transport (Document 5.13) presents and assesses traffic in peak week and average week across a peak year. The TA (Document 5.13.2.1) presents monthly traffic profiles for links and AM and PM peak hour profiles are assessed. |
| | 'Preliminary Assessment of Highway Safety Unnamed Road NCR 8 :- HGV % increase weekday 24 hours = 174% Significance = Moderate / Large' HGV % increase should be assessed as an hourly increase in HGV traffic rather than AADT % increase. The IACC disagrees with the significance conclusion as per table 12.46, i.e. 174% increase is not a moderate significance. | IACC 14.8 | ES Chapter 13 Traffic and Transport (Document 5.13) provides an updated assessment of traffic effects on all links used by construction traffic for the Proposed Development. |

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| | 'For the purposes of the preliminary assessment, light vehicles (LV) are considered as cars, vans & goods vehicles weighing less than 7.5 tonnes' Any vehicle over 3.5 tonnes should not be classed as a Light Vehicle as per the Driver & Vehicle Standards Agency's guide to lorry types and weights. | IACC 14.9 | Both ES Chapter 13 Traffic and Transport (Document 5.13) and the TA (Document 5.13.2.1) consider any vehicle over 3.5 tonnes as a Heavy Goods Vehicle (HGV). |
| | National Grid will need to agree an assessment methodology with the IACC prior to any transport assessments being undertaken. | IACC 14.10 | A Transport Assessment Scoping Report (Document 5.13.2.1, Annex A) was first issued to IACC on 17 th November 2016, with a subsequent update provided in October 2017. The methodology was also presented to IACC in August 2017. Comments were received from the authorities on the proposed scheme and method and have been discussed in subsequent meetings. These comments and discussions are reflected in the TA (Document 5.13.2.1). |
| 14.4 Location and access to Braint. | Table 12.0 (Study Area) 'Link Description: A4080 between A5 and Plas Newydd'. This link is deemed unsuitable as a proposed construction haulage route due to capacity constraints making it unsuitable for the volume of HGVs, with limited options for physical improvements due to existing structures, properties, etc. Certain traffic management measures such as temporary traffic lights implemented as mitigation measures are likely to be objected by the Highways Authority on the basis of disruption, extensive driver delay, major road safety issues due to the proximity of Llanfairpwll primary school. | IACC 14.11 | <p>The construction route strategy and the OCTMP (Document 7.5) has been substantially revised to account for comments from IACC Highways throughout the development of the project.</p> <p>Construction routes have been identified based on feedback from the local highway authority. In addition, the temporary access track has been extended from the S42 scheme in order to provide opportunities to reduce the amount of construction traffic on the local highway network and mitigate potential effects.</p> <p>The A4080 between A5 and Plas Newydd is identified as a route for AILs, some upfront enabling works and as a contingency route. It is not identified in the OCTMP (Document 7.5) as a Primary construction route.</p> |
| | Table 12.0 (Study Area) 'Link Description: Unnamed road between Star and access to Braint'. This link is deemed unsuitable as a proposed construction haulage route due to capacity constraints and restrictive widths making it unsuitable for the volume of HGVs, with limited | IACC 14.12 | The construction route strategy and the OCTMP (Document 7.5) has been substantially revised to |

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| | options for physical improvements due to existing structures, properties, etc. The A5 junction in this link has a history of collisions and speeding complaints. | | <p>account for comments from IACC Highways throughout the development of the project.</p> <p>Construction routes have been identified based on feedback from the local highway authority. In addition, the temporary access track has been extended from the S42 scheme in order to provide opportunities to reduce the amount of construction traffic on the local highway network and mitigate potential effects.</p> <p>The route referred to in the comment is identified as a route for some upfront enabling works, access for OHL elements and as a contingency route. It is not identified in the OCTMP (Document 7.5) as a Primary construction route.</p> |
| | Table 12.0 (Study Area) 'Link serving Bellmouth F01/G8/T1A/iii (Unclassified road over Pont Rhonwy Llanfairpwll)'. This link is deemed unsuitable to accommodate any HGV or increase in LV traffic due to capacity constraints, poor horizontal and vertical alignment, etc. | IACC 14.13 | In order to reduce the impact on the two links referred to in the comments above, the Proposed Development has identified this link (Pont Ronwy) as the primary construction traffic route for the Braint Tunnel Head House. The Proposed Development includes this road to be closed as a through route for general traffic for the duration of the construction programme. The OCTMP (Document 7.5) outlines the intended use and management of this link. |
| | National Grid should seek alternative routes or introduce physical highway improvements to make routes more suitable to accommodate an increase in traffic volume generated by the Proposed Project. It is important that regular dialogue is maintained between National Grid and the IACC. | IACC 14.14 | <p>The OCTMP (Document 7.5) and Transport Assessment (Document 5.13.2.1) details physical and non-physical highways mitigation measures to enable the Proposed Development to be constructed.</p> <p>Regular meetings and dialogue with IACC has taken place continually throughout the project.</p> |

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| 14.5 Suitability of Construction Traffic Routes (Appendix 4.3 preliminary CTMP, Annex A2: preliminary Construction Routes and Access Point Locations). | <p>14.5.1 All construction traffic routes are to be agreed with the IACC. The following list, which is by no means exhaustive, contains unsuitable routes/bellmouths proposed for use within proposed project:</p> <ul style="list-style-type: none"> Bellmouth A05 - Assessment should include Horizon works, i.e. Site Preparation & Clearance works to fully assess the impact and mitigation required. Brynddu Road (Llanfechell to Rhosgoch) - This section of road deemed unsuitable to accommodate an increase in traffic volume due to capacity constraints, lack of road width to accommodate 2-way traffic flow, etc. Unnamed Road A8 (B5111 to Capel Parc) - This section of road deemed unsuitable to accommodate an increase in traffic volume due to capacity constraints, lack of road width to accommodate 2-way traffic flow, etc. Lon Leider - This section of road deemed unsuitable to accommodate an increase in traffic volume due to capacity constraints, lack of road width to accommodate 2-way traffic flow, etc. Unnamed Road A9 (Lon Bachau) - This section of road deemed unsuitable to accommodate an increase in traffic volume due to capacity constraints, lack of road width to accommodate 2-way traffic flow, etc. Route linking B5110 Rhosmeirch to B5111 - not suitable for use as an LGV route. Alternative route should be proposed. Unnamed Road A10 - Section of road linking to the Temporary Access Road (TAR) deemed unsuitable to accommodate HGV traffic Unnamed Roads A17 & A20 serving Bellmouths E03, E04, E05 and E06 not suitable for increase in traffic volume. Alternative suitable route should be proposed. Bellmouth C11 - road serving access to proposed Bellmouth C11 is a public highway - this should be noted on the drawings. Unnamed Road A19 - road serving proposed bellmouth C06 & C07 in poor condition and unable to accommodate an additional volume of traffic without remedial /improvement works. | IACC 14.15 | <p>1. Arrangements for access in this location have evolved and are documented in the OCTMP (Document 7.5).</p> <p>2. This is proposed as a tractor and trailer and LGV route with one temporary access located off it in the OCTMP (Document 7.5). Temporary access tracks are proposed to provide the opportunity for construction traffic to avoid the Local Road Network (LRN) and mitigate against the potential traffic effects of the Proposed Development.</p> <p>3. This is proposed as a tractor and trailer and LGV route with one temporary access located off it in the OCTMP (Document 7.5). Temporary access tracks are proposed to provide the opportunity for construction traffic to avoid the LRN and mitigate against the potential traffic effects of the Proposed Development</p> <p>4. The proposed LGV only route to temporary cross over bellmouths B12 and B13 has been removed from the OCTMP (Document 7.5).</p> <p>5. This is proposed as a tractor and trailer (on the eastern section only) and LGV route with two temporary accesses located off it in the OCTMP (Document 7.5). Temporary access tracks are proposed to provide the opportunity for construction traffic to avoid the LRN and mitigate against the potential traffic effects of the Proposed Development.</p> <p>6. Proposed LGV route removed from the OCTMP (Document 7.5).</p> <p>7. The short construction traffic route link between temporary bellmouth C3 and C4 has been removed</p> |

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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <ul style="list-style-type: none"> B5420 between Llangefni Link Road roundabout and construction compound entrance - substantial improvement required due to network constraint points. Unnamed road NCR 8 / A5 junction to be included within Transport Assessment. | | <p>by relocating temporary bellmouth C3 opposite to C4 to form a cross over type bellmouth.</p> <p>8. Temporary bellmouths E3 and E4 have been relocated to the east and bellmouths E5 and E6 have been removed from their original location. Temporary access tracks are proposed to provide the opportunity for construction traffic to avoid the LRN, and reduce the potential traffic effects of the Proposed Development.</p> <p>9. Temporary bellmouth C11 has been removed from the OCTMP (Document 7.5).</p> <p>10. The OCTMP (Document 7.5) refers to condition surveys for routes identified for construction traffic to enable the Proposed Development. This link is identified for the use of tractor and trailer and LGV use. Temporary access tracks are proposed to provide the opportunity for construction traffic to avoid the LRN, and reduce the potential traffic effects of the Proposed Development.</p> <p>11. Proposed construction route between Llangefni link road roundabout and proposed overhead line construction compound access D3 (approx. 1km) proposed to remain, however alternative routes via the access track network could be used to reduce the potential traffic effects of the Proposed Development.</p> <p>12. This is included in the Transport Assessment (Document 5.13.2.1).</p> |
| | All construction traffic routes to be agreed with IACC with regular dialogue continued. Mitigation proposals to be assessed where appropriate in the form of physical highway improvements or alternative routing proposals. | IACC 14.16 | The construction route strategy and the OCTMP (Document 7.5) has been substantially revised to account for comments from IACC Highways throughout the development of the project. |

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| | | | The OCTMP (Document 7.5) and Transport Assessment (Document 5.13.2.1) details physical and non-physical highways mitigation measures to enable the Proposed Development to be constructed. |
| 14.6 Location and access to the Construction Compound | In Chapter 6 (Proposed Mitigation and Residual Effects) National Grid calculate that – ‘Vehicle trips associated with the OHL scheme element, approximately 30% are expected to route via the construction compound near Llangefni. The remaining 70% of traffic is assumed to route directly to and from the appropriate bellmouth connecting the Temporary Access Road and the construction area’. | IACC 14.17 | This assumption is no longer referred to in ES Chapter 13 Traffic and Transport (Document 5.13) as more detail is now known about the likely activity to the OHL construction compound. |
| | Sufficient information has not been provided to evidence the above assumption. The IACC considers the links providing access to the construction compound poor and unsuitable. This is due to a combination of network constraint points and poor vehicular access on to and off the strategic highway network. Funding for sections 3&4 of the Llangefni Link Road included as a construction route for National Grid vehicles it yet to be secured. The B5420 between Llangefni and Four Crosses roundabout is not suitable as a HGV route to the construction compound, due to poor horizontal and vertical geometry, restrictive widths, community severance, etc. Due to the above constraints, National Grid should consider Bryn Cefni Industrial Estate (Llangefni) or other suitable sites as compatible locations for the construction compound and proceed to engage with the IACC on suitability to accommodate traffic movements during the construction period. | IACC 14.18 | <p>This assumption is no longer referred to in ES Chapter 13 Traffic and Transport (Document 5.13) as more detail is now known about the likely activity to the OHL construction compound. We understand that funding for sections 3&4 of the Llangefni Link Road is now secured and the road is scheduled to be completed before construction for the Proposed Project commences. Were it not to be completed, an alternative route through the Bryn Cefni Industrial Estate has been included in the OCTMP (Document 7.5) and assessed within the Transport Assessment (Document 5.13.2.1).</p> <p>The B5420 between Llangefni and Four Crosses roundabout has been identified in the OCTMP (Document 7.5) as a HGV contingency route for construction traffic.</p> <p>The alternative construction compound locations suggested by IACC were considered, however on balance they offered no overall benefit over that proposed which is central to the overhead line route.</p> |
| | In the first instance, further consultation is required with the IACC to discuss the distribution of traffic on the local and strategic highway network. Secondly, highway improvements to be proposed and agreed with the IACC to make the link to the construction compound more suitable and to facilitate the predicted increase in HGV traffic volume as a result of the National | IACC 14.19 | The construction route strategy and the OCTMP (Document 7.5) has been substantially revised to |

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| | Grid project. IACC are considering the need for financial contributions to secure the use of sections 3 & 4 as an access route, or consider an alternative suitable route to the construction compound. | | <p>account for comments from IACC Highways throughout the development of the project.</p> <p>The OCTMP (Document 7.5) and Transport Assessment (Document 5.13.2.1) details physical and non-physical highways mitigation measures to enable the Proposed Development to be constructed.</p> <p>We understand that funding for sections 3&4 of the Llangefni Link Road is now secured and the road is scheduled to be completed before construction for the Proposed Project commences. Were it not to be completed, an alternative route through the Bryn Cefni Industrial Estate has been included in the OCTMP (Document 7.5) and assessed within the Transport Assessment. (Document 5.13.2.1).</p> |
| 14.7 Wales Coastal Path (Appendix 4.4 Draft Public Rights of Way (PRoW) Management Plan) | It is anticipated that the construction traffic route along the A4080 will have a negative effect on the PRoW, including local community walks and a section of the All Wales Coastal Path. It will be necessary to assess the safety of PRoW users along this route due to the significant increase in HGV traffic volume generated by National Grid project. This section of PRoW should also be included in the socio-economic chapter, due to an anticipated reduction in attractiveness of the route resulting in a loss of potential users, etc. | IACC 14.20 | <p>The A4080 between A5 and Plas Newydd is identified as a route for AILs, some upfront enabling works and as a contingency route. It is not identified in the OCTMP (Document 7.5) as a Primary construction route.</p> <p>The effects of the Proposed Development on Public Rights of Way (PRoW) are assessed in Section 9 of the ES Chapter 13 Traffic and Transport (Document 5.13).</p> <p>The PRoW Management Plan (Document 7.6) outlines how the interface between the All Wales Coast Path and the Proposed Project will be managed.</p> |
| 14.8 Public Rights of Way (PRoW) (Cross reference with Chapter 16) | Para 5.1.8 of the Socio Economics chapter states that: 'According to the PRoW Management Plan, it is anticipated that the majority of PRoWs that are affected by the Proposed Project will be managed through the use of contract staff at crossing points'. | IACC 14.21 | <p>The effects of the Proposed Development on PRoW are assessed in Section 9 of the ES Chapter 13 Traffic and Transport (Document 5.13).</p> <p>The PRoW Management Plan (Document 7.6) outlines how the interface between the All Wales</p> |

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| | | | Coast Path and the Proposed Project will be managed. |
| | Additional detail is provided in the Management Plan in Appendix 4.4, however, further information is required on how this would operate, particularly with regards to Health and Safety arrangements and likely length of delays to PRow users. | IACC 14.22 | <p>The effects of the Proposed Development on PRow are assessed in Section 9 of the ES Chapter 13 Traffic and Transport (Document 5.13).</p> <p>The PRow Management Plan (Document 7.6) outlines how the interface between the All Wales Coast Path and other PRow and the Proposed Project will be managed.</p> |
| | It should be ensured that appropriate Health and Safety protection is afforded to PRow users within close proximity to construction areas. If delays are likely to be significant, a temporary diversion may be more appropriate. Any such proposals should be discussed with the IACC with a sufficient level of underpinning information. | IACC 14.23 | <p>The effects of the Proposed Development on PRow are assessed in Section 9 of the ES Chapter 13 Traffic and Transport (Document 5.13).</p> <p>The PRow Management Plan (Document 7. 6) outlines how the interface between the All Wales Coast Path and other PRow and the Proposed Project will be managed.</p> |
| 15.0 AIR QUALITY AND EMISSIONS (Chapter 13) | | | |
| | <p>National Grid state that – ‘<i>The energy strategy for the proposed project is currently ongoing and emissions data for the purposes of the air quality assessment will be provided when available. The detailed assessment of energy plant emissions that will be reported in the ES will be based on the method described in Appendix 13.4</i>’.</p> <p>The lack of assessment of the environmental impacts associated with the proposed energy plant is of concern to the IACC. The assessment, and proposed mitigation measures should be completed and consulted on prior to DCO submission. Appendix 13.4 shows that dispersion modelling would be undertaken and only 1 year of meteorological data from Mona Station would be used. It is considered best practice that interannual variability should be tested by using at least three years’ worth of meteorological data.</p> | IACC 15.1 | <p>The assessment of construction phase emergency generator emissions is described in Section 4 of ES Chapter 14 Air Quality and Emissions (Document 5.14) and Appendix 14.3 (Document 5.14.2.3).</p> <p>It includes the sensitivity analysis of impacts using five years of meteorological data from the Mona station.</p> |
| | Once the assessment is completed and interannual variability assessed, IACC should be consulted on the assessment of potential impacts and advise on the requirement for any | IACC 15.2 | The assessment of construction phase emergency generator emissions is described in Section 4 of ES |

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| | abatement measures which are required for the energy plant. The CEMP does not contain noise and air quality mitigation measures specifically in respect of the energy plant. The CEMP should be updated with project-specific measures in accordance with the findings of the EIA. | | Chapter 14 Air Quality and Emissions (Document 5.14) and Appendix 14.3 (Document 5.14.2.3). It includes the sensitivity analysis of impacts using five years of meteorological data from the Mona station. Any mitigation measures required to control/minimise emissions associated with emergency generators are described within the CEMP (Document 7.4). |
| 16.0 CONSTRUCTION NOISE AND VIBRATION (Chapter 14) | | | |
| PEIR Chapter 14 – para 2.1.2 | Study area for off-site access is described as "noise change along each link". This is a way of identifying impacts rather than a spatial study area. The issue of spatial study area for road traffic noise resulting from the application site was raised by IACC within the scoping response. Spatial scope may not be sufficient to identify all likely significant effects. | | The study area for construction traffic routes has been defined by identifying the existing road links where construction traffic would be required to access, and then providing a 250 metre (m) zone around the road links identified. Further details of the assessment methodology that has been used are provided in ES Chapter 15 Construction Noise and Vibration (Document 5.15) Further details regarding the rationale for the construction traffic routes considered is provided in Chapter 13 Traffic and Transport (Document 5.13). |
| PEIR Chapter 14 – para 4.3.23 | Residential properties are assessed as being noise sensitive, although developments such as hospitals and schools also contain receptors that are potentially noise sensitive. It is therefore appropriate to determine sensitivity on a case by case basis at a local level. The WHO 'Guidelines for Community Noise' [14] offer some comment on degrees of sensitivity, identifying 'vulnerable subgroups' such as those suffering from particular medical conditions. | | The paragraph referenced indicates that sensitivity will be determined on a case by case basis at a local level which is accepted by the Council as appropriate. Table 4.2 of the PEIR defines the sensitivities generally allocated to each receptor type and this table has been used generically except where the defined sensitivities may need to be varied based upon specific circumstances as per the case by case basis. Particular sensitivities assigned to each receptor are provided in Section 9 mitigation |

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| | | | <p>and residual effects of ES Chapter 15 Construction Noise and Vibration (Document 5.15). The WHO document is mainly focused on guidance for new residential developments.</p> <p>Non-residential receptors have been considered within the assessments in ES Chapter 15 Construction Noise and Vibration (Document 5.15).</p> |
| PEIR Chapter 14 – para 4.3.31 | For construction sites where works are being carried out for a period of greater than six months, lower noise limits will apply than those identified above. A daytime façade noise limit of 58 dB $L_{Aeq,12hr}$ between 07:00 and 19:00 hrs and a night time free-field noise limit of 45 dB $L_{Aeq,12hr}$ (adjusted to façade level from free-field to be consistent with the levels in Table 14.3). | | <p>It is noted that there is a typographical error in this section and it should read 'night-time free-field noise limit of 45 dB $L_{Aeq,12hr}$'.</p> <p>This text has been amended in ES Chapter 15 Construction Noise and Vibration (Document 5.15).</p> |
| PEIR Chapter 14 – Table 14.5, para 4.3.34 | The Council welcomes the inclusion of the reference to consideration of the duration of the works, but we note that the wording stops short of identifying the point at which significant effects would be identified. A footnote to the table to state that the vibration levels apply to a measurement position that is representative for the point of entry into the recipient would be useful, as this is different to the location for the following Table (14.6). Assessment of significance cannot be made without defined criteria for significance. Relocation of values, issues raised to ensure clarity and correct application of criteria. | | As with BS 5228-1:2009+A1:2014, the methodology in DMRB does not follow standard EIA protocol where impact and sensitivity are separated. Therefore in general (i.e. for residential and other receptors of medium sensitivity), a magnitude of effect of low or above (i.e. a 1 dB or greater change in the short-term) would result in a significance of effect of minor or above. This connection has been clarified in ES Chapter 15 Construction Noise and Vibration (Document 5.15). |
| PEIR Chapter 14 – para 4.3.35 | BS 7385-2 -described as 2 in the numbers, then as Part 1 in the words. Should be part 2. | | This has been checked and amended in ES Chapter 15 Construction Noise and Vibration (Document 5.15). |
| PEIR Chapter 14 – para 4.3.36 | For sites where there is the potential for blasting activity to take place, additional vibration criteria following guidance in MTAN1 will be applied. At these sites, ground vibration at the nearest sensitive receptor, as a result of blasting, should not exceed a peak particle velocity (PPV) of 6 mms-1 in 95% of all blasts measured over any six month period. Additionally, no individual blast should exceed a PPV of 10 mms-1. | | This is addressed in the section 4 of ES Chapter 15 Construction Noise and Vibration (Document 5.15) and appropriate management measures are included in the CEMP (Document 7.4) and Noise and Vibration Management Plan (NVMP) (Document 7.9). |

| Table 1: Isle of Anglesey County Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| 16.1 Pylon Construction (Construction Noise Impacts) | In paragraph 6.3.13, National Grid state – ‘The preliminary assessment of noise impacts arising from different aspects of construction has identified piling works as a potentially significant source of noise and vibration. Further assessment of this activity has therefore been carried out’ | IACC 16.1 | See below. |
| PEIR Chapter 14 16.1 Pylon Construction (Construction Noise Impacts) | The IACC believe the assessment of piling noise/vibration for OHL pylons has been carried out on a worst case basis, assuming impact methods for piling, which is appropriate for the purpose of the environmental impact assessment. It is likely that a quieter method will be required when close to noise sensitive receptors. The IACC would expect arrangements to be set out for how BPM will be secured. | IACC 16.2 | The CEMP (Document 7.4) would require the contractor to adopt Best Practicable Means (BPM) for all works which could result in adverse noise or vibration effects at receptors. The type of foundation construction for the pylons would vary with ground conditions; please refer to Chapter 4 Construction, Operation, Maintenance and Decommissioning of the Proposed Development (Document 5.4). For whatever ground conditions and commensurate foundation construction is required for each pylon, the contractor would employ the best practicable means in relation to plant and methods as appropriate to the foundation type required. This is a commitment in the NVMP (Document 7.9). |
| PEIR Chapter 14 16.2 Tunnel | In paragraph 6.5.3 under the main heading of Tunnel and sub heading of Drill and Blast, National Grid state – ‘Air over-pressure as a result of surface blasting activity Lower frequency airborne energy may be felt as concussion or pressure. Due to the temporary nature of the works, it is not considered likely to result in an adverse impact at the nearest receptor. Air overpressure will be mitigated through appropriate blast design. Noise from blasts within the tunnel will be contained and will reduce the further the tunnel progresses below surface.’ | IACC 16.3 | Noted. No response required. |
| PEIR Chapter 14 16.2 Tunnel | Further ahead in the chapter in paragraph 6.5.11 under sub heading Construction Noise and Vibration Impact, National Grid state ‘Both tunnelling methods have the potential to result in discernible ground- borne noise and vibration as they pass underneath NVSRs. The potential noise and vibration impact will depend on the tunnel route and the chosen method. From experience of other tunnelling projects, ground-borne noise and vibration are unlikely to result in a significant impact at potential receptors due to the short duration in which the tunnelling activity will pass within close proximity (under) of the receptor. Therefore, effects due to ground-borne noise/vibration are likely to be of negligible significance particularly if any potentially affected residents are notified in advance which constitutes best practice’. | IACC 16.4 | Noted. No response required. |

| Table 1: Isle of Anglesey County Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| PEIR Chapter 14 – para 6.5.10 to 6.5.12 | <p>6.5.10 appears to contradict section 6.5.3 with respect to whether or not tunnelling related activity has the potential to result in noise and vibration impact.</p> <p>The Council agrees with respect to the conclusion regarding the low likelihood of significant impacts due to tunnel boring machine, although this conclusion will need reference to evidence for similar ground condition, TBM type and receptor location in the ES. See previous comment with respect to the potential for issues arising from Temporary Construction Railway if receptors are close and mitigation not included.</p> | IACC 16.5 | There is the potential for impacts to occur due to tunnelling, whereas Section 5.5.3 relates specifically to blasting. |
| PEIR Chapter 14 – para 6.5.16 | Drilling activities would take place for a period of six months or more, and therefore moderate adverse effects are expected to occur at a level of 58 dB L _{Aeq,T} for daytime activity and 45 dB L _{Aeq,T} for night-time activity. With both tunnelling and drill and blast methods, the levels at NSRs exceed the threshold for moderate adverse effects for night-time activity. Therefore, if night-time working is required then appropriate mitigation will need to be put into place in order to reduce the significance of effects. | IACC 16.6 | This has been assessed in ‘Section 9.78 tunnelling works’ of ES Chapter 15 Construction Noise and Vibration (Document 5.15). |
| PEIR Chapter 14 16.2 Tunnel | The IACC believes that there is a clear need for pro-active community liaison if significant effects are to be avoided. The IACC would expect arrangements to be set out in the CEMP (or Noise and Vibration Management Plan) for notifications to be made to potentially affected noise/vibration sensitive receptors regarding tunnelling/blasting. | IACC 16.7 | This has been addressed; please refer to the CEMP (Document 7.4) which is secured by Requirement 6. |
| PEIR Chapter 14 16.3 Construction Environmental Management Plan (CEMP) (General) | The IACC believes that the proposed mitigation measures are inadequate and expects the proposed controls and mitigation measures to be consistent with best practice and consistent with the protection provisions that have been used on other DCO schemes. The IACC would expect more information setting out how long term, 24 hour noise from the tunnel support site would be controlled, and how those controls would be secured. It should be noted that impacts associated with the proposed energy plant are yet to be assessed. | IACC 16.8 | See response below. |
| PEIR Chapter 14 16.3 Construction Environmental Management Plan (CEMP) (General) | IACC expects arrangements to be set out for how working hours and BPM will be secured. For example, many DCO schemes have made commitments to use processes for seeking, obtaining and working within specific consents as set out in Section 61 of the Control of Pollution Act (s61). Mechanisms should also be set out for monitoring construction effects and ensuring that they are not materially worse than those reported in the environmental statement. | IACC 16.9 | Comments noted. ‘Section 9.7 tunnelling works’ of ES Chapter 15 Construction Noise and Vibration (Document 5.15) and the CEMP (Document 7.4) fully address and define required mitigation measures including use of the S.61 process. |
| PEIR Chapter 14 | The IACC would expect to see delivery times to construction compounds limited so that deliveries do not occur at night-time. The IACC would like to see more emphasis on logistics, | IACC 16.10 | Traffic has been confined to the core working hours which would be between 07:00 and 19:00 hours |

| Table 1: Isle of Anglesey County Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| 16.3 Construction Environmental Management Plan (CEMP) (General) | planning and organisation to reduce impacts. 'Just in time' deliveries to specific sites rather than to the construction compound could reduce impacts, where practicable. | | (hrs) Monday to Saturday and between 09:00 and 17:00 hrs on Sundays as set out in Requirement 8. Any out of hours deliveries are only likely under exceptional or emergency circumstances. |
| PEIR Chapter 14 16.3 Construction Environmental Management Plan (CEMP) (General) | It is recommended the construction compound at Llangefni (PEIR 3.12.2) should be located in the more easterly of the two fields either side of the fence. This takes advantage of natural screening provided by landform, to protect the nearby property. Bunding using material from the site could be used to provide additional mitigation, along the fence line. | IACC 16.11 | This suggestion has been considered along with other issues and constraints and the more easterly of the two fields has been selected, please refer to Construction Plans DCO_D/WO/PS/04_A and DCO_D/WO/PS/04_B (Document 5.4.1.1) |
| PEIR Chapter 14 16.4 CEMP – Fencing and other means of enclosure | <p>In paragraph 7.1.4, National Grid state that: <i>'Further mitigation, over and above that contained within the preliminary CEMP may be required at long term and 24 hr construction sites. This may include the use of acoustic barriers and enclosures for particularly noisy activities, or the erection of site hoardings which will be provided around most sites anyway. These measures will only be definable once the contractor has completed a detailed noise and vibration assessment of the specific activities and works that will occur at each location. These measures will then be identified in the detailed CEMPs in relation to each site or area of works'</i></p> <p>No reference has been made to solid site hoardings of sufficient mass to provide a barrier to reduce construction noise in the CEMP. Where there's a need to provide noise reduction appropriately designed imperforate site hoarding should be used to reduce noise from the construction site. Barriers are cited in CEMP Table 2. For a static plant the IACC would expect that the duration and hours of use of the plant would be cited as a deciding factor in the level of mitigation required.</p> | IACC 16.12 | Mitigation requirements for long term and 24 hour construction sites have been considered on a site by site basis and are reported in Section 9 mitigation and residual effects of ES Chapter 15 Construction Noise and Vibration (Document 5.15) and secured in the NVMP (Document 7.9)/CEMP (Document 7.4). |
| PEIR Chapter 14 16.5 CEMP – Off-site mitigation | IACC would expect reference to a commitment to an off-site mitigation programme. This may be required in the event that the ES identifies significant effects which cannot reasonably or practicably be mitigated within the work-site, or that such effects occur during construction as a result of noisy work being required that could not reasonably have been foreseen when the ES was prepared. | IACC 16.13 | Wherever significant adverse effects are identified, options for mitigation have been considered and committed to as necessary in the CEMP (Document 7.4)/NVMP (Document 7.9). |
| PEIR Chapter 14 16.5 CEMP – Off-site mitigation | It is established good practice for large infrastructure projects to have a Noise Insulation and Temporary Re-Housing Policy for the construction phase. The Policy sets out criteria (noise levels, length of time of anticipated impacts) which if met would trigger either temporary rehousing or noise insulation. It also sets out what measures are to be taken when predictions indicate that the criteria will be exceeded. Operation of the scheme is made a contractual | IACC 16.14 | The assessment is presented in Section 9 mitigation and residual effects of ES Chapter 15 Construction Noise and Vibration (Document 5.15) and necessary mitigation committed to in the CEMP (Document 7.4)/NVMP (Document 7.9). |

| Table 1: Isle of Anglesey County Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | requirement for the Contractor. This approach has been seen to ensure that the Contractors provide the maximum effort to control noise at source. | | |
| PEIR Chapter 14 – Section 7.1 | The proposed mitigation measures set out in this chapter are inadequate. We would expect the proposed controls and mitigation measures to be consistent with best practice and consistent with the protection provisions that have been used on other DCO schemes. For example, we would expect specific provisions and arrangements to be set out for working hours and BPM and how they will be secured. For example, many DCO schemes have made commitments to use processes for seeking, obtaining and working within S61 consents. Where, despite the use of BPM on site, the noise and vibration effects are likely to be acute it would be reasonable to expect noise insulation and/ or temporary rehousing to be considered. Mechanisms should also be set out for monitoring construction effects and ensuring that they are not materially worse than those reported in the environmental statement. This will ensure proper control of construction noise and vibration, particularly associated with long term works such as the tunnelling. | IACC 16.15 | Comments noted; ES Chapter 15 Construction Noise and Vibration (Document 5.15), the CEMP (Document 7.4) and NVMP (Document 7.9) address and define required mitigation measures including use of the s. 61 process. |
| 17.1 OPERATIONAL NOISE AND VIBRATION (Chapter 15) | | | |
| 17.0 Conductors | This chapter is cross referenced with the Preferred Route Options Selection Report (PROS Report), (Options Appraisal Scope and Methodologies OASM) where it states in 9.2: 'EN-5 notes that noise from overhead lines is unlikely to lead the determining authority to refuse an application; this is because noise from high voltage overhead lines is principally a function of voltage and geometry and it is not practicable to eliminate noise effects entirely. Once built, opportunities for further mitigation of overhead line noise are very limited. National Grid follows the guidelines on noise set out in EN-5 and considers these as an integral part of its process for siting and the design of new overhead lines'. | IACC 17.1 | This Comment is noted. |
| | <p>PEIR paragraph (4.1.9 Section B: Rhosgoch to Llandyfrydog) states: <i>'There will be approximately 5.9 km of new linecomprising L12 pylons with Twin Redwood conductor operated at 400 kV. A section of the existing overhead line is to be realigned requiring the removal of seven L6 pylons to be replaced with L12 pylons with twin Redwood conductor'</i>.</p> <p>The IACC believes that in transposition zones, the potential for noise problems is increased due to 2 x OHL of twin conductors and the proximity to dwellings. Not only will an additional line be erected in this area but the existing line will experience an alteration which will see deterioration in its noise performance. As little can be done once the lines are constructed, the IACC believe there is sufficient justification to consider undergrounding the cables in these area. The</p> | IACC 17.2 | <p>In the transposition areas two new OHLs have been modelled in the ES. It is implicit that in these areas the width of the zone of effect would be wider as the two new OHLs are spaced at least 65 m apart.</p> <p>The combined effect of new and existing OHL infrastructure is considered qualitatively within the results of this assessment. Further details are provided in technical Appendix 16.3 (Document 5.16.2.3) and Appendix 16.4 (Document 5.16.2.4)</p> |

| Table 1: Isle of Anglesey County Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | additional cost of replacing pylons on the existing line and the deterioration in noise performance merits further consideration for undergrounding within these transposition areas, because as paragraph 5.1.28 states <i>Underground cables do not produce operational noise or vibration...</i> ". | | <p>with a summary of results presented in section 9 of ES Chapter 16 Operational Noise (Document 5.16).</p> <p>National Grid considered whether the use of underground cables in this section of the route would be appropriate, having regard to National Planning Policy and National Grid's statutory duties. In the Wylfa to Pentir Preferred Route Corridor Selection Report (Document 9.2) National Grid considered that an overhead line route could be identified in this area that would comply with all relevant legislation and planning policies, and that the significant additional cost of the underground cables in the area from Rhosgoch to Rhosybol would not be appropriate.</p> <p>In bringing forward a final design proposal National Grid again considered the need to use underground cables in this area. The further detailed design and assessment work which has been undertaken and informed by consultation feedback has led National Grid to conclude that its earlier judgement in 2015 remains the most appropriate overall design solution. The use of an overhead line in this area would comply with National Planning Policy and National Grid's statutory duties. This is further explained in the Back-check of Wylfa-Pentir Design Decisions Report (Document 7.18).</p> |
| 17.2 Tunnel Head House (THH) | <p>For the proposed Tunnel Head House development National Grid in paragraph 5.1.31 state that <i>'Operational noise from THH's will be assessed using the method outlined in BS 4142:2014 ... This method will identify potentially significant adverse effects and assist in appropriate design criteria and noise mitigation where necessary. However at this stage it is considered unlikely that there will be any significant effects, due mainly to the distance to the nearest NSR.'</i></p> <p>The IACC seeks a comprehensive design and assurance process to ensure that significant effects are avoided and any adverse effects are minimised as far as it is practical to do so. Upon reviewing the outcome of the design and assurance process, the IACC will advise on the need</p> | IACC 17.3 | <p>The design of the tunnel head houses has considered potential operational noise effects and the approach has been discussed with IACC and Gwynedd Council during stakeholder meetings. The THHs have been designed as far as reasonably practicable using engineering noise control measures.</p> <p>The results of the noise assessment for both THHs are included in Appendix 16.5 (Document 5.16.2.5).</p> |

| Table 1: Isle of Anglesey County Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | for control measures and DCO Requirements to ensure delivery of equipment with acceptable noise levels. | | Noise contour plots for both sites are presented in Figure 16.5, 16.6 and 16.7. |
| 17.3 Substations | This chapter is cross referenced with the Draft Route Alignment Report (DRA Report) 4: Section A Wylfa to Rhosgoch | IACC 17.4 | This Comment is noted. |
| | Paragraph 5.1.38 of the PEIR states that: 'No additional reactive plant is proposed for Wylfa, however it is anticipated that an additional shunt reactor will be required at Pentir. A full assessment of potential noise emissions from substations will be carried out when detailed plant requirements are available.' | IACC 17.5 | It is confirmed that there is no additional reactive plant at Wylfa substation, please refer to Chapter 3 Description of the Proposed Development (Document 5.3). A new shunt reactor would be required at Pentir substation, to be located within the boundary of the existing substation within the zone shown on Design Plan DCO_DE/PS/01 Sheet 3 of 9 (Document 4.13). This is assessed in ES Chapter 16 Operational Noise (Document 5.16). |
| | <p>DRA Report – 4: Section A states that: ...<i>'to connect one of these two new circuits to Wylfa, an extension will be required to the existing Substation.</i> DRA Report – 4: Section A states that: ... <i>'It is proposed that the new electrical equipment required would largely comprise compact, gas insulated equipment rather than the more traditional air insulated equipment that makes up the existing substation at Wylfa. ...</i></p> <p>The IACC consider that noise limits will need to be discussed and limits imposed to ensure that there are no significant effects due to noise from equipment at the substations. The IACC seek that a full assessment be carried out for the EIA and that a detailed design, procurement and assurance process be specified and agreed to avoid significant effects and minimise adverse impacts as far as practical. Following the assessments the IACC will review the requirement for noise limits to be imposed, and Requirements imposed to ensure delivery of equipment with acceptable noise levels.</p> | IACC 17.6 | ES Chapter 16 Operational Noise (Document 5.16) has considered noise emissions related to all operational plant applied for within the draft DCO (Document 2.1) |
| | Electrical hum has been the cause of complaint from Cemaes village in the past. The IACC understands that at the present time National Grid are uncertain whether it is their own transformers or those at Wylfa A which are audible in Cemaes or a combination. One of the remaining transformers is identified as a quieter type while SGT4 is of an older noisier type. | IACC 17.7 | The transformers at National Grid Wylfa substation do not form part of the DCO application. |

| Table 1: Isle of Anglesey County Council | | | |
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| | Consideration should be given to offering replacement of this transformer as a mitigation measure in this area. | | |
| 17.4 Mitigation and Residual Effects | <p>National Grid state in paragraph 6.1.1 – <i>‘At this stage it is not possible to provide detailed mitigation measures until the design and layout have been finalised. A further assessment will be carried out at detailed design stage, looking at methods to mitigate the potential noise impacts from the Proposed Project’</i>. Paragraph 6.1.4 indicates that <i>‘Once the design and routing options for a new overhead line are fixed there are no further practicable mitigations options available....’</i> Paragraph 6.1.5 concludes with <i>‘Noise from pylon fittings and insulators will be mitigated through the selection of appropriate equipment and correct installation...’</i></p> <p>The first two statements above appear contradictory. The IACC understand that the pylon siting and conductor selection are fundamental to the noise produced, and once these are set there can be no further mitigation, other than selection of pylon fittings and insulator types. It would therefore seem apparent the choice of conductor is a fundamental means of mitigation. The IACC has therefore serious concerns about the PEIR assessment and its influence on the choice of conductor, because the assessment is currently based on an assumed background noise level of 30dB (A), which the IACC does not agree with. The statement that the chosen configuration is the quietest system that can be deployed should be justified with sufficient evidence.</p> | IACC 17.8 | <p>National Grid agree with IACC that pylon siting and conductor selection are fundamental to the noise produced and the outcome of noise assessment.</p> <p>The justification for the choice of conductor type and pylon siting is set out in the Design Report (Document 7.17).</p> <p>National Grid adopts a staged approach to the design of all its projects. The information used is proportionate to that stage in the project’s development i.e. Strategic Options, Route Corridors and detailed alignment. At all stages a back check is undertaken of previous decisions to check their validity. Further information is provided in the Back Check of Wylfa-Pentir Design Decisions Report (Document 7.18).</p> |
| | It would therefore appear that the choice of conductor is a fundamental means of mitigation and this needs to be environmentally appropriate within the constraints of the options available. A process should be set out for selecting, agreeing and securing the optimum alignment and location of overhead lines and other equipment that will minimise noise as far as it is practical to do so. | IACC 17.9 | The justification for the choice of conductor type and pylon siting is set out in the Design Report (Document 7.17). ES Chapter 6 Operational Noise (Document 5.16) considers the Proposed Development as given in the Works Plan (Document 4.4). |
| 18.0 SOCIO-ECONOMICS (Chapter 16) | | | |
| 18.1 Employment and Skills | National Grid state: <i>‘There is potential for the proposed development to impact (positively or negatively) on the communities within the study area through the introduction of additional workers. The number of construction workers would fluctuate throughout the construction programme, and is expected to peak at around 400. The main construction works are expected to take place over a four year period (2020-2024) (para 5.6.2), with the majority of the workers coming from outside the region’</i> (no details given) (Page 68). | IACC 18.1 | This comment has been noted |

| Table 1: Isle of Anglesey County Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | National Grid suggest that a small number of construction jobs would be taken up by workers from Anglesey and Gwynedd (page 47)'. | IACC 18.2 | This comment has been noted |
| | <p>The key issues relevant to the socio-economic chapter which need to be addressed are:</p> <ul style="list-style-type: none"> Local employment and skills - The skills profile and number of local jobs has not been defined. This is a necessary pre-requisite to identifying opportunities, access to jobs and training and developing pathways to employment. The profile and numbers will also determine the extent and scale of a range of other potential impacts e.g. demand for accommodation from construction workers; Potential negative employment effects - if the demand for local employment is already taken up by other existing projects, exceeding local capacity. This needs to be understood if the potential to create local jobs from the project are to be realised. In view of the relatively low number of jobs estimated at peak, there are likely to be limited displacement effects. It is suggested this analysis is undertaken; Commitment to using local businesses and labour - the above National Grid PEIR statements need to be translated into a firm commitment to maximise local jobs and training through main contractors and sub-contractors alongside an understanding of what skills/competences are required for the potential jobs (refer to Supply Chain Charter and Procurement Strategy mitigation proposals); The findings from the Business survey will provide further evidence on the potential effects on local businesses from which mitigation proposals would be developed. It is understood that the IACC are to request an update on IACC's input into the Business Survey methodology and the timeline for carrying out the surveys – analyse results and identify further areas of concern. | IACC 18.3 | <p>An assessment of socio-economic effects is provided in Chapter 17, Socio Economics (Document 5.17), and includes an assessment of employment effects during construction in section 9. The assumptions made in relation to the skills profile of workers is presented in Appendix 17.2 Workforce Analysis Assumptions Log (Document 5.17.2.2).</p> <p>Employment effects during the operational phase have not been considered. General operation activities are expected to be undertaken by existing National Grid employees and the numbers would be expected to be low. Any employment generation that could be directly attributed to the operation of the Proposed Development would be minimal and represent a 'no change' or 'no impact' scenario.</p> <p>An assessment of cumulative effects on employment is provided in section 10 of Document 5.17.</p> <p>For full results of the Business Survey, refer to Document 5.17.2.4. An overview of the survey and the results is provided in section 7 of Chapter 17 (Document 5.17).</p> <p>Details of enhancement opportunities are provided in the Enhancement Strategy (Document 7.13), a draft of which was provided to IACC prior to submission of the DCO for comment.</p> |
| | <p>The IACC would suggest that the following mitigation measures should be developed and taken forward:</p> <ul style="list-style-type: none"> Develop a Workforce Strategy which identifies the number of potential jobs and the skills required locally with a view to increasing training to enable residents to take advantage of | IACC 18.4 | Details of enhancement opportunities are provided in the Enhancement Strategy (Document 7.13), a draft of which was provided to IACC prior to submission of the DCO for comment. |

| Table 1: Isle of Anglesey County Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>job opportunities. The skills profile should set out the local-non-local labour position. The analysis should cover the construction and operational phases of the project;</p> <ul style="list-style-type: none"> Whilst the overall construction workforce numbers are likely to be relatively low, the project offers the opportunity for employment, work experience, training and apprenticeships. A realistic and deliverable target for the employment of local people should be secured based on an agreed Workforce Strategy (see 1 above). For example, the Hinkley Connections project identified a cumulative total of at least 17% employment of local people with NG or Tier1 or Tier 2 contractors; Develop and adopt a clear Procurement Strategy which requires first and second tier contractors to identify the number and range of jobs, training places, work experience placements and apprenticeships available. This should be in the form of an Employment and Training Plan which identifies how and when the opportunities will be delivered; Identify/create apprenticeships and work placements leading to permanent jobs and set a clear target and commitment to a number of apprentices and work placements in different trades and occupations showing how this is broken down and what resource (financial and staff) is dedicated to delivering it; Contractors will be required to work with the IACC and partners to promote opportunities for training and employment which should be monitored; Undertake a gap analysis to identify potential opportunities and develop employment and training pathways work for target groups and residents who aspire to enter the construction sector labour market. This should involve working collaboratively with the IACC and training/support agency partners; Invest in training provision and new training facilities to maximise the proportion of job opportunities being taken by labour resident in the labour market/travel to work area in construction and operational phases. Includes capital investment in facilities both for construction trades, mechanical and electrical, civils, managerial and professional and support occupations to maximise the use of local talent and labour and address the impacts of labour displacement; Investigate access to training and employment, can act as a barrier to entry and progression in the labour market, particularly for young people without access to a car or with limited access to public transport; and | | |

| Table 1: Isle of Anglesey County Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <ul style="list-style-type: none"> Deliver a programme of promotion and awareness about the opportunities using existing publicity channels and web based initiatives. Utilise Employment & Skills Service for the project to increase / enhance local employment. | | |
| 18.2 Supply Chain | <p>For project-wide effects National Grid state: <i>‘Construction of the project would require significant capital expenditure. A proportion of this expenditure is associated with labour, supporting construction employment as discussed above. The remaining non-labour proportion would be spent on construction works / materials generating supply chain effects. Due to the specialised nature of the construction work, the majority of this expenditure is likely to be captured outside the region. However, a small proportion of the construction expenditure would be captured by businesses within Anglesey and Gwynedd.’</i></p> <p><i>‘Direct employment and expenditure effects as well as indirect / induced effects will be assessed in full in the ES; Only a limited assessment of effects on non-tourism businesses resulting in potential loss of trade is presented in the PEIR. Further information on the trade and operations of non-tourism businesses is required to fully assess the effects. This will be presented in the ES’.</i></p> <p>National Grid anticipate that a small number of construction jobs would be taken up by workers from Anglesey and local labour/contractors would be provided the opportunity to take up construction contracts and this could include dry stone walling, planting, fencing, plant hire and provision of some construction materials.</p> | IACC 18.5 | For an assessment of expenditure and supply chain effects, refer to section 9.11 of Chapter 17, Socio Economics (Document 5.17). For an assessment of employment effects, including presentation of the anticipated skills profile, refer to section 9.10 of Chapter 17 (Document 5.17). |
| | <p>The key issues relevant to the socio-economic chapter which need to be addressed are:</p> <ul style="list-style-type: none"> There is no indication as to how these services will be procured or type of the jobs could that could be on offer. Clarity is required about access to jobs and procurement process, accreditation etc. The IACC expect that a procurement strategy is required and a commitment to supporting local businesses to become tender ready to be in a position to compete for opportunities during the construction, maintenance (operational) and decommissioning phase. There is insufficient information on the exact number of opportunities likely to arise, or the percentage perceived as local within this. National Grid contend that due to the specialised nature of the construction work, the majority of construction expenditure is likely to leak outside the region. However, a small proportion of the expenditure would be captured by local businesses within Anglesey and Gwynedd. The IACC acknowledge that elements of the project are specialised in nature, | IACC 18.6 | <p>For an assessment of expenditure and supply chain effects, refer to section 9.11 of Chapter 17 (Document 5.17). For an assessment of employment effects, including presentation of the anticipated skills profile, refer to section 9.10 of Chapter 17 (Document 5.17).</p> <p>Details of enhancement opportunities are provided in the Enhancement Strategy (Document 7.13), a draft of which was provided to IACC prior to submission of the DCO for comment.</p> |

| Table 1: Isle of Anglesey County Council | | | |
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| | however, the IACC would expect to capture the maximum number of local opportunities for less specialised contracts. | | |
| | <p>National Grid suggest that a number of socio-economic measures could be developed including a supply chain strategy; local sourcing of construction materials, and a construction worker accommodation strategy. The IACC would suggest that the following mitigation measures should be developed and taken forward:</p> <ul style="list-style-type: none"> • A clear procurement strategy which sets out the work packages and services required. The strategy should encourage the use of consortia and set out the accreditation requirements and how local companies can register. The strategy should commit to “buying local” where possible (subject to commercial considerations and the need to deliver value for money). First Tier and Second Tier contractors should be required to use reasonable endeavours to engage with local companies and set out procurement requirements and the range of opportunities; • Commit to develop the proposed “Supply Chain Charter” to ensure potential local businesses are aware of the opportunities and likely demands of the project. The overriding objective of the Charter should be to encourage and support local businesses to plan for and become “tender ready”, enable ‘upskilling’, training and business development thereby be in a strong position and to compete for opportunities; • The proposed “Supply Chain Charter” should enable awareness raising events about opportunities (clearly defined) and how local companies should register. This would enable local companies to be “tender ready” to compete for site preparation works contracts other activities associated with the development i.e. civils; scaffolding; fencing, stone-walling, temporary roads, site security etc. • Further assessment is required to identify the number of local: non- local construction contractors/jobs and to assess the associated expenditure effects; • National Grid should commit to working with the IACC and partners to provide business support/training to build competences and capacity thereby enhancing the chances of success on this projects and similar projects in the future; • Use Sell2Wales and other procurement portals including the IACC’s Corporate website and the NWEAB’s website which has a section on Supply Chain to promote opportunities, set out the tender timelines and to raise awareness about the project. | IACC 18.7 | Details of enhancement opportunities are provided in the Enhancement Strategy (Document 7.13), a draft of which was provided to IACC prior to submission of the DCO for comment. |

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| 18.3 Tourism | <p>Within the socio-economic chapter National Grid report on a number of tourism related activities:</p> <ul style="list-style-type: none"> A Business Survey will be undertaken during autumn 2016 in order to gather further evidence on the potential effects on local businesses. Telephone interviews will be undertaken by an independent market research company, targeting businesses which may be affected by the Proposed Project. The results of the survey will be incorporated into the assessment presented in the ES (para 3.3.8, page 10) A Visitor Behaviour was undertaken in August 2016 with a second round due to be completed in October 2016. The aim of the survey is to understand visitor behaviour and motivation for visiting the area, and whether construction and operation of the proposal is likely to affect visitors' intentions to return, their spending and / or the types of activities they undertake. The survey will involve face-to-face interviews with visitors to various camping / caravan sites and attractions, and users of public footpaths. The results of the survey will be used to inform the assessment of effects on the tourism sector presented in the ES (para 3.3.4 page 9). According to NG, the positioning of the proposal is such that it avoids close proximity to the majority of tourism locations and attractions. Whilst disruption during construction could result in a reduction in visitors to particular areas / sites it is likely that these visits would be displaced elsewhere within Anglesey/Gwynedd as opposed to resulting in a net loss of visitors (page 69). Whilst disruption during construction could result in a reduction in visitors to particular areas / sites it has been suggested that these visits would be displaced elsewhere within Anglesey/Gwynedd as opposed to resulting in a net loss of visitors; National Grid recognise that Tourism businesses are highly sensitive to visual effects, air quality and noise; therefore there is potential for significant effects on these receptors. Further effects may be identified within the wider ZTV and will be assessed at the ES stage. According to National Grid the introduction of construction workers into the area would generate additional tourism accommodation revenue. It is expected that workers would take up spare capacity in hotels / B&B / non-serviced accommodation that would otherwise be empty. In addition, construction workers would spend a portion of their wages in the area, generating further benefits to local businesses. This needs to be quantified in the terms of cumulative impacts with other projects and the potential decline in accommodation stock quality. | IACC 18.8 | This comment has been noted |

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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>The key issues relevant to the socio-economic chapter which need to be addressed are:</p> <ul style="list-style-type: none"> • Tourism is worth over £270 million to the Isle of Anglesey economy, attracting over 1.6 million visitors and is a major local employer supporting over 4,000 jobs. Tourism is a fiercely competitive global industry. In view of the importance of tourism to the local economy, tourism has not been considered in sufficient depth and detail. • To provide more robust evidence for the above, the results and analysis of the surveys are awaited. There is concern that the infrastructure (pylons, sub-station, overhead lines, and main tunnel head house for the Strait) could have a negative impact on the landscape, amenity and tourism offer reducing visitor numbers and behaviours, revenues and therefore impact on the local economy, employment and prosperity. • There is insufficient information on the impact on tourism accommodation and what proportion of workers will be taking up this element of the industry. There needs to be additional analysis in terms of the occupancy levels required and what is currently available; • A number of tourism related issues appear to be based on assumptions and not on raw data. In our view these are premature and need appropriate assessment in place to quantify their robustness. Overall there is limited information on tourism impacts and mitigation proposals. It is not clear as to the extent of impacts on the tourism sector from the perspective of visitor activity, local produce and food impacts on accommodation and wider impacts on activity within the sector including displacement of employment from businesses in sectors including hospitality, food, catering and other sectors of central importance to the tourism sector and wider economy. It is likely that displacement levels will have limited effects. • There is limited information on how the tunnel head house for the Strait crossing will be accessed, and what impact this will have on the settlements of Llanfair PG and Llanndaniel, and possible secondary impacts to the A4080 which houses Plas Newydd and one of the main thoroughfares to Newborough (some of our busiest and most popular visitor destinations) • The DMP 2016-2020 makes clear recommendations in terms of the major energy projects and strategic infrastructure, and it is vital that these recommendations are taken on board • The IACC expect potential impact on image and perception of the Island to be included, this would need consideration and potential mitigation during the construction/operation periods. | IACC 18.9 | <p>During the Stage One Consultation (2012), the preliminary preferred strategic option of an onshore connection and potential route corridors between Wylfa and Pentir were consulted upon. Following a review of feedback and further design and assessment work, potential route options were identified within the preferred route corridor and consulted upon at Stage Two Consultation (2015). A proposed alignment within the preferred route option was designed, taking account of feedback, and consulted upon at Stage Three Consultation (see Design Report (Document 7.17)). As part of this process, the potential social and economic effects, including tourism, of the route corridors, route options and Menai Strait crossing options were assessed. Potential effects on tourism are often linked to landscape and visual amenity concerns. The design taken forward has been developed to minimise landscape and visual effects and, taking account of other considerations, is considered to be most favourable from a socio-economic perspective.</p> <p>Chapter 17, Socio Economics (Document 5.17) takes a multifaceted approach to assessing potential socio economic effects of the Proposed Development on tourism and includes:</p> <ul style="list-style-type: none"> • the consideration of individual receptors (such as tourism businesses, tourist attractions, recreational resources and PRow) assessing the potential effects on them arising from visual, noise, air quality or traffic and transport impacts, in isolation or in combination. • the assessment of potential effects on the availability of tourism accommodation as a result of construction worker demand. |

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| | <p>This is also true for people travelling across the Island to/from the port of Holyhead for further travel or from cruise vessels visiting the area.</p> <ul style="list-style-type: none"> The coastal path on Anglesey attracts over 330,000 walkers annually for the tranquillity and unobstructed views. The PEIR mentions the coast path around Wylfa and Vaynol. Need to ensure that the coastal path around Anglesey especially at the Menai area is also captured and scoped within the ES. | | <ul style="list-style-type: none"> the assessment of potential effects on labour availability in the tourism sector. the assessment of potential effects on the wider tourism sector that could result from changes in visitors' behaviours or perceptions of the area. This has informed by the outputs of a bespoke Visitor Behaviour Survey. <p>In addition, potential effects on the amenity of communities have been assessed (see Appendix 17.1, Document 5.18.2.1); a summary of the findings of this is provided in Chapter 17, Section 9. This is a combined assessment of air quality, noise, traffic and visual effects. This includes settlements close to the Tunnel Head Houses.</p> <p>The socio-economic assessment does not identify any significant adverse effects on communities or tourism, either in isolation or cumulatively with Wylfa Newydd and other major developments. As a result, no mitigation is required. Details of enhancement opportunities are provided in the Enhancement Strategy (Document 7.13), a draft of which was provided to IACC prior to submission of the DCO for comment.</p> |
| | <p>The IACC would suggest that the following mitigation measures should be developed and taken forward:</p> <ul style="list-style-type: none"> It is noted that a community relations agency will be appointed to provide dedicated community relations and external communications support to investigate and manage complaints, taking appropriate action accordingly. Details of the governance arrangements, timeframe and relationships will be required to ensure appropriate linkages to IACC and other tourism stakeholder bodies and (4) below; There is a need for further work to identify which areas will be significantly impacted and identify linkages between issues and areas that will be affected as a basis for developing | IACC 18.10 | <p>The Amenity Assessment in Chapter 17 Socio Economics (Document 5.17) assesses potential effects on communities within the Study Area. Where significant effects are identified for a community, this would trigger an assessment of effects on community facilities</p> <p>A total of 50 community settlements were considered in relation to potential amenity effects.</p> <p>Effects on communities during construction and operation were assessed as not significant in all</p> |

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| | <p>responsive and realistic mitigation proposals. It is likely that displacement levels will be limited these should be defined;</p> <ul style="list-style-type: none"> Physical proposals should ensure minimal disruption to local communities and the tourism economy and be in accordance with planning policies, SPG and Design Excellence principles SG. National Grid should work with the IACC and partners on emerging mitigation proposals; The provision of a financial support to provide regular surveys with visitors to gauge impacts and adapt mitigation as the development progresses; The provision of a financial support to provide regular surveys with visitors to gauge impacts and adapt mitigation as the development progresses; Where rights of way, byways and cycle paths are affected by the development, alternative routes should be planned for and promoted to both residents and visitors to encourage travel by sustainable modes; and Where the destruction of planting/woodland occurs a series of advanced planting to take place to ensure limited impacts. Undergrounding for longer distance away from the Menai Strait and under the A55. This would result in no visual impact of additional pylons for individuals using the A55, A5 or main rail connections. | | <p>communities and, accordingly, effects on community facilities during construction and operation are also assessed as not significant.</p> <p>As no significant effects are identified for the Proposed Development, no mitigation is proposed. No enhancement measures are described in Chapter 17 Socio Economics. Proposed enhancement measures are documented in the Enhancement Strategy (Document 7.13), a draft of which was provided to IACC prior to submission of the DCO for comment.</p> <p>Potential indirect amenity effects on PRowS, byways and cycleways have been assessed (Document 5.2.17.1). No significant effects have been identified.</p> <p>All mitigation measures set out in the ES are also provided in the Schedule of Mitigation (Document 5.28). This includes how PRowS and cycleways would be managed and improved, and the replanting and management of the Gylched Covert and the woodland around Pentir substation. In addition, details of new planting proposed around the two tunnel head houses and sealing end compounds are provided in the landscape assessment chapter of the ES (Document 5.7) and illustrated in Documents 5.7.1.12 to 5.7.1.16. With the exception of the Gylched Covert and Pentir substation, no woodland is proposed to be removed.</p> <p>Enhancement opportunities are set out in the Enhancement Strategy, which has been submitted as part of the DCO application (Document 7.13). This covers further measures such as voluntary boundary planting which could provide benefits to individual properties.</p> |

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| | | | <p>In response to the feedback provided at the Stage Two Consultation requesting that the connection be placed underground, the potential sensitivities of the area near the village of Star were considered against National Planning Policy and National Grid's statutory duties. National Grid concluded that an overhead line was the appropriate technology choice in this area.</p> <p>In bringing forward a final design proposal following feedback received at the Stage Three Consultation, National Grid considered the need to use underground cables in this area, including consideration of the A55, A5 and main railway. The further detailed design and assessment work which has been undertaken and informed by consultation feedback has led National Grid to conclude that its earlier judgement remains the most appropriate overall design solution. The use of an overhead line in this area would comply with National Planning Policy and National Grid's statutory duties. This is further explained in the Back-check of Wylfa-Pentir Design Decisions Report (Document 7.18).</p> |
| 18.4 Public Rights of Way (PRoW) (Cross reference with Chapter 12) | <p>Para 5.2.1 of the Socio Economics chapter refers to amenity effects on promoted PROW in Section A during OHL construction:</p> <p><i>'The Proposed Project crosses 17 PROWs, as shown in the PROW Crossing Schedule in Appendix 3.4. Of these PROWs, two are promoted for recreational use (PROWs 38/034A/2 and 20/031/1 both of which form part of the Wales Coast Path). These paths are potentially affected by construction traffic and transport (see Chapter 12). Sections of the routes also fall within 20m of the proposed OHL where there is a medium risk of air quality impacts from dust soiling/deposition (see Chapter 13) and within 250m of the proposed OHL where there are potential noise and vibration impacts (see Chapter 14). The proposed OHL also crosses Sustrans 566 cycle route. Sections of the route fall within 20m of the proposed OHL where air quality impacts may arise and within 250m of the proposed OHL where noise impacts may arise. The combination of these effects could result in potentially significant amenity effects on users of the PROW 38/034/A/2 and 20/031/1, and Sustrans 566.'</i></p> | IACC 18.11 | <p>National Grid has engaged with IACC and its representatives on the development of the PROW Management Plan (Document 7.6).</p> <p>Direct effects on PROW, such as temporary diversions and closures, are assessed in Chapter 13 Traffic and Transport (Document 5.13) and considered in the PROW Management Plan (Document 7.6).</p> <p>Amenity effects on PROW have been assessed in the Chapter 17, Socio Economics (Document 5.17)</p> <p>As no significant effects on PROW are identified for the Proposed Development, no mitigation is</p> |

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| | <p>Potentially significant effects are also identified during OHL decommissioning (para 5.2.10).</p> <p>The magnitude of effect and therefore significance of effect on PRow 38/034/A/2 and 20/031/1, and Sustrans 566 is yet to be confirmed. Mitigation proposals for PRow 38/034/A/2 and 20/031/1, and Sustrans 566 should be discussed with the IACC, including input from air quality and noise specialists to identify appropriate measures.</p> | | proposed. No enhancement measures are described in Chapter 17 Socio Economics. Proposed enhancement measures are documented in the Enhancement Strategy (Document 7.13), a draft of which was provided to IACC prior to submission of the DCO for comment. |
| 18.5 Public Rights of Way (PRow) (Cross reference with Chapter 12) | <p>Para 5.2.2, 5.2.3 and 5.2.4 of the Socio Economics chapter refer to amenity effects on promoted PRow in Section B, C and D during OHL construction:</p> <p>The Proposed Project crosses ten PRows as shown in the PRow Crossing Schedule in Appendix 3.4. None of these PRows are promoted for recreational use; therefore users are not considered to be sensitive to changes in environmental effects. The proposed OHL also crosses Sustrans 5 cycle route. Sections of the route fall within 20m of the proposed OHL where air quality impacts may arise and within 250m of the proposed OHL where noise impacts may arise. The combination of these effects could result in potentially significant amenity effects on users of Sustrans 5.' Potentially significant effects are also identified during OHL decommissioning (para 5.2.10).</p> | IACC 18.12 | Noted. The potential amenity effects on these PRow and cycle routes are assessed in the Socio-Economic Amenity Assessment (PRow) (Appendix 17.1, Document 5.17.2.1). |
| | The magnitude of effect and therefore significance on Sustrans 5 is yet to be confirmed. Mitigation proposals for Sustrans 5 should be discussed with the IACC, including air quality and noise specialists to identify appropriate mitigation measures. | IACC 18.13 | National Grid has continued to engage with IACC and its representatives on the development of the PRow Management Plan (Document 7.6) |
| | Access from the A4080 to construct the proposed tunnel head near Llwyn Ogan will involve crossing a permissive section of the Wales Coastal Path which is located parallel to the A4080 within the field. Construction traffic is likely to have a significant effect on this path and a temporary closure might be necessary. Mitigation proposals for the Wales Coast Path near the A4080 should be discussed with the IACC with the suggestion that the establishment of a new section of the Wales Coast Path along the coast through Plas Newydd land should be investigated as mitigation. This would provide a lasting legacy. | IACC 18.14 | As no significant effects on PRow are identified for the Proposed Development, no mitigation is proposed. No enhancement measures are described in Chapter 17 Socio Economics. Proposed enhancement measures are documented in the Enhancement Strategy (Document 7.13), a draft of which was provided to IACC prior to submission of the DCO for comment. |
| 19.0 AGRICULTURE (Chapter 17) | | | |
| | All farms which are likely to be affected by the Proposed Project should be assessed for disruption individually, ensuring the relevant enterprise is identified. There could be significant disruption to normal farm activities, for example, the day to day logistics of a dairy farm could be affected considerably with cattle requiring milking twice a day. If a dairy farm was split during | IACC 19.1 | Throughout the Project, National Grid has been in consultation with the Land Owners so as to identify any areas of increased sensitivity which may be affected by the development, to allow appropriate |

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| | National Grid's construction and decommissioning phase, grazing rotation may be affected. Similarly, suckle herd calving may need ease of access to farm buildings when calving intervention is required. National Grid should undertake an accurate and up to date database of existing farm uses. | | mitigation measures put in place so as to minimise the impact. |
| | Where will the soil excavated for foundations of the towers be disposed of, as the majority will be sub-soil and will be significant in volume. Although it has been partly addressed on page 21 paragraph 5.1.12 | IACC 19.1 | The Outline Soil Management Plan (OSMP) (Document 7.10) details best practice measures for the handling, storage and restoration of soil resources to ensure land is restored to its pre-development agricultural quality. |
| 20.0 INTRA PROJECT CUMULATIVE EFFECTS (Chapter 18) | | | |
| | The assessment of intra-project effects is inadequate and requires further assessment. The IACC has raised a number of concerns regarding the methodology and initial assessment outcomes presented, which at this stage lack evidence. The statement that no significant effects are identified requiring mitigation lacks supporting evidence. The IACC consider that further mitigation may be required, particularly in consideration of intra-project effects on local receptors associated with construction disturbance (noise, air quality, designated nature conservation sites, and amenity impacts on users of PROW etc). The means by which and location of assessment of amenity effects is ambiguous, referring to individual assessment chapters without drawing any conclusions as to intra-project and socio-economic effects. There is very little assessment of intra-project effects during construction to support the conclusions set out by National Grid. Further consultation including draft assessment outcomes and mitigation proposals to be secured by way of method statement and requirements are essential. | IACC 20.1 | The Intra-Project Effects assessment has been revised since the publication of the PEIR. The methodology of the assessment is provided in Section 4 of ES Chapter 19 Intra-Project Effects (Document 5.19). Those receptors identified as having a potential significant effect in the first stage of the assessment, were taken forward to a shared receptor workshop, which was attended by various technical teams, to determine if significant cumulative effects would occur. |
| | Intra project cumulative effects cannot be assessed using the methodology for visual effects assessment. A separate and different methodology is required, which accounts for the differential topic effects. This is not sufficiently addressed in the PEIR, and the assessment method set out in Intra-Project effects is not yet sufficiently developed. | IACC 20.2 | A separate methodology for intra-project effects has been developed, which is set out in ES Chapter 19 Intra-Project Effects (Document 5.19). |
| | The IACC is yet to be consulted on a clear and coherent methodology for the assessment of cumulative intra-project effects and would expect engagement with National Grid at the earliest opportunity. | IACC 20.3 | A draft copy of the ES Chapter 19 Intra-Project Cumulative Effects (Document 5.19) was issued to IACC for consideration and comments received have been addressed where appropriate. |

| Table 1: Isle of Anglesey County Council | | | |
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| 21.0 INTER PROJECT CUMILATIVE EFFECTS (Chapter 19) | | | |
| | Table 18.4 contains the preliminary assessment of effects, however the IACC consider that the drawing together of conclusions lacks a robust evidence base at this stage due to the level of maturity of the EIA assessment. The cumulative assessment in this chapter must therefore be kept under review and should be subject to further consultation. | IACC 21.1 | This comment is noted. A draft copy of the ES Chapter 20 Inter-Project Cumulative Effects (Document 5.20) was issued to IACC for consideration and comments received have been addressed where appropriate. |
| | It is noted that the key conclusions are reported in the individual assessment chapters rather than Chapter 19. The IACC considers cross-referencing to be essential. | IACC 21.2 | This comment is noted. |
| | The IACC is yet to be consulted on a clear and coherent methodology for assessment of cumulative inter-project effects and would expect engagement with National Grid at the earliest opportunity. | IACC 21.3 | This comment is noted. A draft copy of the ES Chapter 20 Inter-Project Cumulative Effects (Document 5.20) was issued to IACC for consideration and comments received have been addressed where appropriate. |
| 22.0 SOCIO-ECONOMIC – CUMULATIVE EFFECTS | | | |
| | <p>The PEIR suggests that ‘other major projects located in Anglesey and north Gwynedd could also result in cumulative effects in terms of general construction disturbance affecting visitors’ perceptions of the area and a consequent reduction in visitor numbers / associated expenditure. Such cumulative effects would only occur if construction phases overlap significantly. Based on currently available information on construction timescales, the following developments are considered potentially likely to result in a cumulative effect on tourism visitors: Wylfa Newydd, Land and Lakes, and the A487 Caernarfon to Bontnewydd Bypass. However, it is considered unlikely that there would be a material increase on the overall significance of effects of these projects in combination.</p> <p>Given the number of major developments proposed on Anglesey over the next 5 to 10 years, there is a real risk of adverse cumulative impacts on the Island. This includes cumulative impacts within the National Grid Project to serve HNP’s development (i.e. Wylfa Newydd Site and associated developments) and cumulative impacts with other major development such as Land & Lakes, National Grid, LNG Great Lakes, Orthios and others. The IACC would expect to</p> | IACC 22.1 | Cumulative impacts relating to i) tourism (visitor numbers) and ii) the local economy are assessed in section 10 of Chapter 17, Socio Economics (Document 5.17). |

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| | agree in advance the approach and methodology to assess the cumulative impacts on the Island and to monitor the cumulative impacts. | | |
| | Further information could be provided to clarify the definition of amenity, the scope of this assessment, and the methodology to be employed. However, limited information is provided in relation to the scope of this assessment and the assessment methodology to be applied. The Council requests to be consulted further on the scoping of such surveys. | IACC 22.2 | The scope of the amenity assessment, together with a definition of amenity, is provided in section 3 of Chapter 17, Socio Economics (Document 5.17). The methodology for the amenity assessment is provided in section 4 of Chapter 17 Socio Economics (Document 5.17). |
| | There is a need to adequately assess the perception of the impact of the development on the tourism industry and to measure the cumulative impact of all the major energy developments to ensure where possible no negative impact takes place on the economy as it's acknowledged in 14.5.30 that Anglesey's economic performance is below average across Wales. Further negative impacts on the tourism sector on Anglesey could have further detrimental effects. There is a need to consider secondary and tertiary tourism products including restaurants/eating out as part of the wider tourism mix and not just attractions and accommodation. Liaison with stakeholders will be required to enable this approach. | IACC 22.3 | <p>Chapter 17, Socio Economics (Document 5.17) takes a multifaceted approach to assessing potential socio-economic effects of the Proposed Development on tourism and includes:</p> <ul style="list-style-type: none"> the consideration of individual receptors (such as tourism businesses, tourist attractions, recreational resources and PRow), assessing the potential effects on them arising from visual, noise, air quality or traffic and transport impacts, in isolation or in combination. the assessment of potential effects on the availability of tourism accommodation as a result of construction worker demand. the assessment of potential effects on labour availability in the tourism sector. the assessment of potential effects on the wider tourism sector that could result from changes in visitors' behaviours or perceptions of the area. This has informed by the outputs of a bespoke Visitor Behaviour Survey. <p>Cumulative effects on tourism are assessed in section 10 of Chapter 17 Socio-Economics (Document 5.17).</p> |

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| | <p>The following proposals will strengthen the approach and address a number of key issues:</p> <p>Key cumulative issues for the IACC include the potential economic and employment opportunities afforded to the local workforce and businesses as a result of a number of projects coming forward on Anglesey at the same time. Insufficient information or no information at all is provided with the S42 documents in relation to cumulative impacts. The IACC would require:</p> <ul style="list-style-type: none"> • Opportunities to increase training to enable workers to take advantages of employment opportunities and supporting STEM awareness and training in schools in addition to post-secondary education to ensure that younger residents are able to identify and take advantage of future workplace opportunities. (Refer to Socio-economic response on skills and employment); • National Grid need to provide mitigation measures such as marketing and 'Brand' support for the tourism sector as a means to reduce effects or to compensate for the loss of trade in the tourism sector during the construction and operational phase. Commitment is required from National Grid in the form of potential mitigation measures to overcome adverse effects on the tourism sector such as improvements elsewhere to the long distance footpath network, cycle network, etc. Marketing and branding should also commence in advance of construction to ensure that visitors are not dissuaded initially from visiting Anglesey; • The IACC expects to see sufficient information, including cumulative visualisations, to enable robust conclusions to be reached on the significance of effects upon local communities (especially those areas that will be mostly affected such as Tregele, Rhosybol, Star, Talwrn). Similarly sufficient information will be required to enable consideration of the combined effects upon the AONB and other designated sites, bearing in mind a combination of effects may give rise to a significant level of disturbance upon communities which surround the pylon corridor and the main transport corridors which follow the line; • The IACC is concerned about the lack of regard of the Welsh Language as a receptor in the cumulative environmental documentation submitted. It is considered that cumulative effects upon the Welsh language should be assessed and mitigation identified where conclusions of significance are reached. | IACC 22.4 | <p>Proposed enhancement measures are documented in the Enhancement Strategy (Document 7.13). Chapter 17 Socio-Economics (Document 5.17) includes an assessment of cumulative effects (section 10).</p> <p>The Welsh Language Impact Assessment (WLIA) (Document 5.26) includes an assessment of potential cumulative effects on Welsh language.</p> <p>As no significant socio-economic effects are identified for the Proposed Development, no mitigation is proposed. No enhancement measures are described in Chapter 17 Socio Economics. Proposed enhancement measures are documented in the Enhancement Strategy (Document 7.13), a draft of which was provided to IACC prior to submission of the DCO for comment.</p> |

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3 Gwynedd Council

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| Table 2: Gwynedd Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| The Council's Response | | | |
| | <p>The Council welcomes the opportunity to submit observations on this scheme as part of the statutory consultation and the commitment made by the company to give the Council and the public an opportunity to express an opinion on the scheme in advance. There are 3 parts to the Council's response on the statutory consultation which includes:</p> <p>a) Overview of the main matters</p> <p>b) Response to the 6 questions asked by the Grid as part of the consultation</p> <p>c) Detailed response to all documents that are part of the consultation which have been prepared with the assistance of the ARUP company (this reiterates a) and b) above and has not been included with this report)</p> | GC 1.1 | This comment is noted. |
| Part 1 - Overview of the main matters | | | |
| The preferred option for upgrading the network | In terms of long term visual impacts, the intention not to construct more pylons and cables across the Menai Straits but to construct a tunnel underground instead is welcomed. | GC 2.1 | This comment is noted. |
| | <p>It is noted that the tunnel for electricity cables reaches above ground in the Fodol area near Nant-y-garth Woodland in Gwynedd which means that there is a need to construct a sealing head compound and a tunnel head building, only approximately 1km from the Pentir sub-station. Again, it is emphasised that careful consideration should be given to creating a tunnel for cables that extends all the way to the Sub-station in Pentir. This would then avoid the need for a sealing head compound and the substantial tunnel head building in the Fodol area, and avoid the need to construct four new pylons to install overhead cables to reach the sub-station in Pentir. This is the preferred option by Gwynedd Council and it is believed that this option needs to be considered in much greater detail, and examine what exactly are the comparative costs, but by doing this it is believed that we should: (a) consider the additional cost against the cost of the entire project - it is likely to be very small in comparison; (b) set the additional cost against the lesser sustainability impact of installing pylons and cables across the land. Without doing this, the company could fail to identify economic and social restrictions and benefits;</p> | GC 2.2 | <p>National Grid carefully considered the siting of the Ty Fodol tunnel head house within Gwynedd and the use of both overhead line and underground cables to complete the connection to Pentir substation. Whilst extending the tunnel to Pentir could reduce the likely environmental effects of the overhead line in Gwynedd it would increase the technical complexity as the tunnel length would increase, the tunnel shaft would be likely to increase in depth, and it would generate additional quantities of spoil resulting in increased traffic movements. As a result, it would also further increase the cost of the scheme.</p> <p>National Grid has assessed the proposals for an overhead line from Ty Fodol to Pentir and does not consider that the benefits of extending the tunnel, given the additional technical complexity and cost outweigh the likely environmental effects of the</p> |

| Table 2: Gwynedd Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | <p>overhead line proposed in the context of applicable statute, policy and guidelines.</p> <p>The options in this area were revisited as a result of the consultation comments received in feedback to the Stage Three Consultation, but no new information was presented that altered the above analysis. This is described in the Back-check of Wylfa-Pentir Design Decisions Report (Document 7.18).</p> |
| The labour market and the economy | <p>It appears that the assessment of impact on the local economy is restricted to considerations involved with the tourism sector. Whilst there is no doubt that there is a need to ensure that the project will not have a detrimental impact on visitor enjoyment of the area during the construction period and afterwards, it is believed that the matter should be examined in a more holistic manner, e.g.</p> <ul style="list-style-type: none"> Impact of infrastructure construction work on vehicle movements in the area, traffic congestion, noise, etc., that could in turn be detrimental to local businesses in terms of receiving and distributing goods; Lack of construction workers' availability with the right skills locally to work on other projects as the major projects taking place will use up this resource. Early intervention measures should be examined such as collaborating to develop local construction skills schemes. Careful attention should be given to measures ensuring that local companies working in many sectors are in a good position to be able to take advantage of work contracts during the construction period. It is believed that considering a strategy for a supply chain / workforce development and a procurement strategy that keeps the benefit local is essential. | GC 2.3 | <p>Comment noted and addressed in Chapter 17, Socio Economics (Document 5.17), Sections 8 and 9.</p> <p>As no significant socio-economic effects are identified for the Proposed Development, no mitigation is proposed. No enhancement measures are described in Chapter 17 Socio Economics.</p> <p>Proposed enhancement measures, including employment initiatives, are documented in the Enhancement Strategy (Document 7.13), a draft of which was provided to Gwynedd Council prior to submission of the DCO for comment.</p> |
| Transport and road infrastructure | The Council is still concerned about the impact on road infrastructure and transport in the region during the construction period. | GC 2.4 | <p>This comment is noted. Likely significant traffic and transport effects of the Project have been assessed. Detail is set out in the traffic and transport chapter of the ES (Document 5.13) and the Transport Assessment (Document 5.13.2.1).</p> <p>The ES, along with a more detailed Transport Assessment report, takes into consideration the traffic and transport effect of relevant schemes that could</p> |

| Table 2: Gwynedd Council | | | |
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| | | | <p>result in likely significant cumulative effect, including Wylfa Newydd.</p> <p>Transport effects are taken into account in the Socio-Economics Amenity Assessment (Appendix 17.1, Document 5.17.2.1).</p> |
| | The Council is concerned about the impact of additional traffic on the A55 corridor to North West England, the A487 corridor towards the South and the A5 corridor to the Midlands. | GC 2.5 | This comment is noted. The scope of the Transport Assessment has been agreed with Welsh Government, IACC and Gwynedd Council, including the extent of the trunk road network that has been assessed. This covers the A55, A487 and A5 and Britannia Bridge. |
| | It is understood that the main work with the Scheme is involved with the construction of the tunnel under the Menai Straits, and although we welcome this in terms of the long term visual impact, very little information is available regarding what would happen to all materials that would need to be disposed of in light of the tunnelling work. The Environmental Impact Assessment (EIA) - which will be required with the application - will need to include a clear strategy about the bulk of the materials, what exactly will be the impact of disposing and transporting the materials along the transport network and the area in general. | GC 2.6 | <p>The Transport Assessment (Document 5.13.2.1) provides detail on the construction vehicle activity associated with the Proposed Development and the impact on construction traffic routes.</p> <p>Information regarding the management of tunnel arisings is also provided in the OMMP (Document 7.12).</p> |
| | We also continue to be of the opinion that there is a need to thoroughly consider the traffic impact of this Scheme with Wylfa Newydd on Britannia Bridge, and we will encourage a further dialogue with Welsh Government and the North Wales Economic Ambition Board to identify any opportunities to develop proposals for a new bridge (which would transport the electricity generated at Wylfa Newydd as well as vehicles), as well as opportunities to use the railway to transport workers and goods. Is it possible for all parties to work together in order to programme these projects on a joint basis to ensure long term benefits? Of course, it is noted that all possible impacts in terms of the option to upgrade the electricity network, would have to be re-considered in the context of the whole project. | GC 2.7 | <p>The impact of the proposed scheme on the A55 and Britannia Bridge has been assessed in the traffic and transport chapter of the ES (Document 5.13) and the associated Transport Assessment (Document 5.13.2). The scope of the Transport Assessment has been agreed with Welsh Government, IACC and Gwynedd Council, including the extent of the trunk road network that has been assessed.</p> <p>National Grid has worked, and continues to work, closely with Welsh Government on their plans for a third crossing at the Menai Strait. Welsh Government officials are keen to understand if it's possible for a bridge to carry the new electrical connection needed for Wylfa Newydd. As part of this, Welsh Government has commissioned National Grid to undertake a</p> |

| Table 2: Gwynedd Council | | | |
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| | | | <p>feasibility study into potential options to use the bridge.</p> <p>There are a lot of things to consider before National Grid and Welsh Government will be able to understand if putting cables of the size required for the new electrical connection on a new bridge is possible. To our knowledge, there are no high voltage transmission cables on a bridge anywhere in the world. Costs, technical considerations, route on and off the bridge and timing are just some of the things to be worked out.</p> <p>In addition, any proposal for a third Menai crossing put forward by Welsh Government needs to be consented and funded before it can go ahead.</p> <p>At the same time, it's vital that National Grid is able to deliver a connection for Horizon in the mid-2020s, when it is expected that Wylfa Newydd would start generating. This is why National Grid is continuing with the plans for a tunnel under the Menai Strait. When completed, the feasibility findings will be considered and next steps agreed.</p> <p>The nature of overhead line construction can involve numerous concurrent work locations which construction workers, equipment and materials have to reach. It is therefore not feasible to use the railway to transport workers and/or goods for the overhead line.</p> <p>The potential to use the railway to transport spoil from the tunnel and to bring in concrete lining segments has also been considered. There are no existing sidings or rail loading facilities in close proximity to either tunnel head house sites or substation locations. The amount of material being generated from the tunnel or substation works would make the construction of such a siding or rail loading facility for</p> |

| Table 2: Gwynedd Council | | | |
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| | | | this purpose unviable. Furthermore, the construction of a siding would require a significant amount of materials and therefore HGV movements in itself. In any case, the use of any other sidings in the region would not reduce the amount of HGV movements generated, as the tunnel spoil would need to be transported to these facilities by road and any materials would need to be transported from these facilities to the construction sites by road. |
| Housing, the Welsh Language and social and community matters | Constructing this scheme will mean that there will be a maximum of approximately 400 workers (although closer to 200 generally) in the Scheme's area. It is noted that the scheme involves approximately 5 years of construction work with the tunnelling work taking the longest time and requiring the majority of workers. | GC 2.8 | More up to date information regarding programme ad worker numbers is provided in Chapter 17 Socio-Economics (Document 5.17) and its appendices. |
| | Substantial parts of the housing market in north west Wales are already beyond the reach of local people on low incomes - which include the Bangor area - as the Local Housing Allowance is insufficient to find accommodation. There is a risk that a further increase in the cost of private home rents will mean that some of the most needy residents within society will be forced to re-locate. This could lead to a risk of moving and exacerbating social problems, including homelessness, and increase pressures on public services beyond Anglesey. The EIA needs to include details about work patterns, workers' profile, numbers and how it is intended to meet workers' accommodation needs. | GC 2.9 | Comment noted and addressed in the WBR (Document 5.27) and ES Chapter 17 Socio-Economics (Document 5.17) |
| | Considering the construction period of the Scheme and the number of workers required, the EIA will need to consider the short and long term impact on the Welsh language and culture of the area in accordance with methodology to be agreed upon by the Councils. | GC 2.10 | A WLIA has been undertaken in parallel to the ES (Document 5.26) |
| | Due to the construction period of the scheme, it is likely that there will be increased demand for local services and that it will influence the social features of our communities. It must be recognised that impact on the local community's features and qualities is possible and there will be a need to work closely to monitor the situation and to identify appropriate mitigation measures. | GC 2.11 | Comment noted and addressed in the Socio-Economic Amenity Assessment (Communities) (Appendix 17.1, Document 5.17.2.1) and the WBR (Document 5.27). |
| | The Council has a real concern about the side-effects of the construction work on the amenities of the area's residents in terms of the impact of engineering work and movements of large lorries. As previously noted, there is currently no clear information regarding what would be the implications of disposing materials in light of the tunnelling work. There is also a concern about the long term side-effects of the Scheme on residents | GC 2.12 | Comment noted and addressed in the Socio-Economic Amenity Assessment (Communities) (Appendix 17. 1, Document 5.17.2.1); this includes potential effects during construction, operation and decommissioning. The method of assessment for the |

| Table 2: Gwynedd Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | who are local to the development, after its completion. The EIA must examine this in detail and identify a methodology to be agreed upon by the Councils to assess impacts on residential amenities. | | Socio-Economic Amenity Assessment (Communities) is detailed in Chapter 17, Section 5. |
| Environmental matters | Lack of information regarding the bulk of materials that will need to be disposed of in light of the tunnelling work makes it very difficult to undertake a robust assessment of what would be the likely environmental impacts. | GC 2.13 | Information regarding tunnelling works can be found in ES Chapter 4 Construction, Operation, Maintenance and Decommissioning of the Proposed Development (Document 5.4). |
| | With the visual impact, the company needs to address the Council's LANDMAP information as well as more recent work undertaken by the Gillespies company on the area's environmental capacity, which has been incorporated into the process of preparing the Gwynedd and Anglesey Joint Local Development Plan. | GC 2.14 | <p>The Isle of Anglesey, Gwynedd and Snowdonia National Park Landscape Sensitivity and Capacity Study, Gillespies (2014) (JLDP Supporting Document) has been taken into account in both Chapter 7, Landscape Assessment (Document 5.7) and Chapter 8, Visual Assessment (Document 5.8) of the ES.</p> <p>LANDMAP information has been utilised to inform judgements regarding landscape value and susceptibility, as presented in Appendix 7.2, VSAA Character Assessment (Document 5.7.2.2). Effects on landscape character are identified for each relevant LANDMAP Visual and Sensory Aspect Area (VSAA) within the same appendix and summarised in Chapter 7, Landscape Assessment (Document 5.7).</p> |
| | A lack of baseline information and supportive evidence on ecological matters makes it difficult to be able to give full consideration to the likely side-effects. Similarly, there is a lack of evidence to support statements made on water quality, resources and flood risks. | GC 2.15 | This has been addressed within ES Chapter 9, Ecology and Nature Conservation (Document 5.9) and its associated appendices, where full baseline results have been provided, and ES Chapter 12 Water Quality, Resources and Flood Risk (Document 5.12). |
| | The Council has a concern about the potential impacts of the scheme on the area's heritage and specifically on the setting of Ancient Monuments such as Fodol Ganol (CN175) and the setting of the Faenol and registered gardens and park. It is believed that priority must be given to undertake further relevant surveys as there is a high possibility that significant archaeological remains have been buried in the area. | GC 2.16 | Effects on the settings of historic assets are assessed within ES Chapter 10 Historic Environment (Document 5.10) and this includes an assessment of effects on both of the assets mentioned. In particular, a baseline description is included within section 7.5 of Chapter 10, and the assessment of effects within section 9.5. This assessment was completed in accordance with Cadw guidance and a draft of the |

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| | | | <p>assessment was shared with Cadw, who were in general agreement with the conclusions. Any effects on the Faenol registered gardens and park would be effectively limited by the use of a tunnel to cross the Menai and the use of a low height pylon on the OHL leading from the Ty Fodol Sealing End Compound to Pentir.</p> <p>It is recognised that construction will affect buried archaeological remains and surveys have been completed in the form of geophysical survey and trial trenching. This is also described within Chapter 10 of the ES (Document 5.10). Disturbance to archaeological remains has been avoided where possible and a programme of archaeological investigation and recording would take place prior to and during construction. This is described within the Archaeological Strategy (Document 7.8) and it is anticipated that this work will improve understanding of the archaeology of the area.</p> |
| Cumulative effects | It is noted that it is inevitable that construction work for this project will take place at the same time as construction work for Wylfa newydd, namely during the period between 2020 until 2025. We are concerned that there is no evidence that sufficient consideration has been given to the exact impact of constructing this project alongside Wylfa Newydd and to decommission Wylfa Power Station. It must also be borne in mind that upgrading work will be undertaken between Pentir and Trawsfynydd in Gwynedd as part of the wider project (although it will not be part of the application for a permitted development order). Therefore, there is a need to consider and understand what exactly will be the cumulative impacts of this work on Gwynedd and in particular the Bangor area. | GC 2.17 | Noted. A full Cumulative Effects Assessment (CEA) is provided in ES Chapter 20 Inter-Project Cumulative Effects (Document 5.20). |
| | It is, therefore, crucial that there is a clear understanding of the cumulative side-effects on Gwynedd across the areas noted above. | GC 2.18 | Noted. A full Cumulative Effects Assessment (CEA) is provided in ES Chapter 20 Inter-Project Cumulative Effects (Document 5.20). |
| Mitigating measures | We believe that the company will need to prepare a mitigation strategy, to explain what mitigation measures will be required and how to realise them through arrangements that include 106 Agreements. Therefore, the company is asked to commit to preparing a mitigation strategy in consultation with the Council. There is a need to consider appropriate | GC 2.19 | A Schedule of Mitigation (Document 5.28) has been prepared. This document combines all the required mitigation measures throughout the technical chapters |

| Table 2: Gwynedd Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | mitigation measures within and outside land that will be within the boundaries of the application, and the scope of the mitigation strategy will need to be broad in order to mitigate all impacts of the scheme, and not only visual impacts. | | of the ES (Document 5.7-5.18) and identifies how/where they are secured. Proposed enhancement measures are documented in the Enhancement Strategy (Document 7.13), a draft of which was provided to Gwynedd Council prior to submission of the DCO for comment. |
| Policy context | <p>The decision maker will need to carefully consider national and local policies. Announcements by the company should give much more attention to the following :</p> <p>a. Explanation that planning and local policies were considered during the application for a Permitted Development Notice, as well as for planning applications that will be determined by the Council;</p> <p>b. The latest version of the Joint Local Development Plan;</p> <p>c. Provide a more balanced description of local planning policies and guidelines, i.e. reference should be made to policies relating to landscape, nature conservation and visual amenities as they are all important to be able to consider the socio-economic impacts of the project.</p> | GC 2.20 | <p>Section 2 of technical chapters in the ES (Document 5.7-5.18) outlines the legislative and planning policy framework that is relevant to that assessment.</p> <p>A full review of compliance with local and national planning policies and relevant guidance documents are provided in the Planning Statement (Document 7.14). The latest version of the Joint Local Development Plan was used in the assessment.</p> <p>A full review of relevant legislation is set out in the Legislation Compliance Audit (Document 5.28.2.1).</p> |
| Part 2 - Response to specific questions asked as part of the consultation: | | | |
| | It is noted that Part 1 of the Council's response above provides an overview of the Council's response to the main matters and, therefore, the following questions are used to provide more specific observations on more local matters, but that this is in the context of the response in Part 1. | GC 3.1 | This comment is noted. |
| C1. Wylfa sub-station and the overhead line in Anglesey | The Council understands the concerns by Anglesey Council regarding the construction of a new row of pylons across the Island, and fully appreciates concerns about the short and long term impacts of the Scheme on the Island's communities. It is expected that the company will give appropriate consideration to concerns that will be conveyed in Anglesey's response when developing the Scheme. | GC 3.2 | The concerns raised in the consultation period have been considered in the design of the Proposed Scheme and preparation of this ES. Amendments in the design and routeing of the Proposed Development are outlined in ES Chapter 2 Alternatives and Proposed Development History (Document 5.2) and |

| Table 2: Gwynedd Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | ES Chapter 3 Description of the Proposed Development (Document 5.3). |
| | Gwynedd Council objects to the construction of overhead cables in Gwynedd and this has been emphasised by the Council from the very beginning. | GC 3.3 | This comment is noted. |
| C2. The tunnel under the Menai Straits and associated equipment | <p>Reference is made to observations of the Council in Part 1 above and in addition, the following observations refer to specific parts of the tunnel scheme, namely:</p> <ul style="list-style-type: none"> Gwynedd sealing head compound Gwynedd tunnel head building Tunnel route and Tunnel construction | GC 3.4 | This comment is noted. |
| | The National Grid's environmental report (PEIR report) requires additional details on transport, the type and method of working and proposed steps to be undertaken to reduce impact on communities and the environment that could be affected. A consultation is expected to be undertaken on these measures and further discussions with NG are expected on these matters. | GC 3.5 | <p>ES Chapter 13 Traffic and Transport (Document 5.13) and the Transport Assessment Report (Document 5.13.2) consider the effects of construction traffic arising from the Proposed Development. The OCTMP (Document 7.5) includes a range of measures to reduce the potential effects.</p> <p>National Grid shared a draft ES with Gwynedd Council, receiving detailed comments which were able to be considered and taken in to account where appropriate in finalising the ES.</p> |
| | Impact on the community and environment surrounding the tunnel head building and sealing head compound cannot be assessed due to a lack of information and details. There is also a concern that the report notes that traffic work and haulage of equipment could take place outside the development's core hours. | GC 3.6 | Comment noted. Please see response to detailed comments provided below. |
| | The Report contradicts itself on the impact of noise from the tunnelling process, this will depend on the nature of the land that needs to be crossed and how close the houses are from the process. Further evidence will be required to ensure that the underground tunnelling process will not create a substantial impact on residents, due to vibrations during the construction period. | GC 3.7 | Potential noise and vibration effects from shaft construction/tunnel boring and drill and blast of the shafts have been assessed in ES Chapter 15 Construction Noise and Vibration (Document 5.15) Section 9.7 tunnelling works. |

| Table 2: Gwynedd Council | | | |
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| | A statement is expected on what direction they will be tunnelling as it could have a substantial impact on areas surrounding the tunnel head. As well as noise, it could have an impact on the quality of local air as a result of dust and traffic emissions. Again, it is emphasised that detailed information is required regarding the bulk of materials that will derive from the tunnelling work and how this will be disposed of to be able to assess the impacts on communities, the transport network and the environment. | GC 3.8 | <p>There are three scenarios for tunnel construction, these are:</p> <ul style="list-style-type: none"> Scenario 1 –TBM from Braint to Tŷ Fodol; Scenario 2 – TBM from Tŷ Fodol to Braint; and Scenario 3 – Drill and Blast from both shafts. <p>All three scenarios have been considered within the Environmental Impact Assessment (EIA) as explained in ES Chapter 6, EIA Methodology (Document 5.6).</p> |
| | There are concerns about the impacts of tunnelling on archaeology and heritage in general, as well as the visual impact of the sealing head compound and tunnel head building on the local heritage environment such as Fodol Ganol (CN175) and the setting of the Faenol and registered gardens and park. There is also a concern about impacts on the visual amenities of nearby residents, on distant views and on residential amenities. | GC 3.9 | Comment noted. Please see response to detailed comments provided below. |
| C3. The overhead line in the north of Gwynedd and Pentir sub-station | Again, it is emphasised that the Council objects to this element of the Scheme and that tunnelling work to the sub-station should be undertaken all the way. More detail is provided on the Council's stance in Part 1 of the response. | GC 3.10 | This comment is noted and response provided above in relation to Part 1. |
| | There is substantial concern about the visual impacts of the four proposed pylons on the amenities of local residents because, although this is a rural area, a number of houses are closely located to the location of the pylons. There is also concern about the impact on the area's visual amenities in general, including the cumulative impact of pylons with overhead cables that are already in the area. | GC 3.11 | <p>A residential visual amenity assessment has been undertaken for all properties that fall within 500 m of LOD/maximum parameters of the Proposed Development; the results of this assessment are provided in Appendix 8.3, Residential Visual Amenity Assessment (Document 5.8.2.3).</p> <p>Existing OHLs within the area have been considered part of the baseline. The assessment of effects on general public visual amenity from publically accessible places is described in Chapter 8, Visual Assessment (Document 5.8).</p> |
| | There is also substantial concern about impacts on archaeological features that are in the location where it is proposed to construct the pylons. | GC 3.12 | A full assessment of potential effects on archaeological features is provided in ES Chapter 10 Historic Environment (Document 5.10). |

| Table 2: Gwynedd Council | | | |
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| | Noise should be one of the main matters when determining the distance between installing cable lines and sensitive properties. The row of pylons is too close to a number of properties in this area and although there is an existing connection to Pentir sub-station, it should not be presumed that these residents should accept more similar noise. | GC 3.13 | The assessment presented in ES Chapter 16 Operational Noise (Document 5.16) takes into account potential noise from the existing line within the assessment, as well as other sources of noise associated with the Proposed Development, (e.g. tunnel head house and new shunt reactor at Pentir Substation). |
| | In considering noise levels, we endeavour to strike a reasonable balance between the rights of residents and the developer's ability to complete the project without unnecessary restrictions being imposed. Further discussions are being held between NG and Anglesey and Gwynedd Officers on some noise matters where both Councils disagree with the interpretation and conclusion of NG. | GC 3.14 | These matters have been discussed with the officers through stakeholder meetings and through submission of the draft chapter 15 Construction Noise (Document 5.15) for comment. |
| | This scheme has considered the type of cable and pylon that would offer the best outcome in terms of noise. However, not much can be done in terms of reducing noise from cables and pylons once the lines will be constructed and put in place. Taking this into consideration, we believe that there is justification to give further consideration for the scheme to be underground in its entirety in this area. | GC 3.15 | <p>The findings of the assessment of operational noise, as reported in Chapter 16 Operational Noise (Document 5.16) are that there would be no significant effects on any property as a result of the Proposed Development.</p> <p>National Grid carefully considered the siting of the Ty Fodol tunnel head house within Gwynedd and the use of both overhead line and underground cables to complete the connection to Pentir substation. The options in this area were revisited as a result of the consultation comments received in feedback to the Stage Three Consultation, but no new information was presented that altered the above analysis. This is described in the Back-check of Wylfa-Pentir Design Decisions Report (Document 7.18).</p> |
| C4. Project development | The Council appreciates the opportunities that have been provided to try to influence the Scheme for the benefit of Gwynedd residents over the past few years as the scheme was developed. | GC 3.16 | This comment is noted. |
| C5. Any other observations? | The Council's response can be seen in Part 1 above and more detailed observations in Part 3. | GC 3.17 | This comment is noted. |

| Table 2: Gwynedd Council | | | |
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| | There is emphasis on the need to give firm consideration to any cumulative impacts of this scheme on the Wylfa Newydd scheme and the need to develop a strategy to mitigate any unacceptable impact. | GC 3.18 | Noted. A full Cumulative Effects Assessment (CEA) is provided in ES Chapter 20 Inter-Project Cumulative Effects (Document 5.20). |
| | In the Well-being Assessment undertaken in September this year, reference was made that very little consideration had been given to the impact on mental health during the Project. Potential impact on those living in the vicinity and concerned about noise or impact on health, as well as those who object to the scheme. There are no details about the impact on communities when individuals or families will consider no other option other than to move away from their community. The developments in Gwynedd substantially affect one community as there is so much development, on a temporary and permanent basis. | GC 3.19 | <p>An Amenity Assessment has been undertaken which considers all communities within the Study Area. No significant effects have been identified. Details are provided in Appendix 17.1, Document 5.17.2.1.</p> <p>In addition, a WBR (Document 5.27) has been prepared which considers the potential effects of the Proposed Development against the Well-being goals of the Welsh Government. The approach was agreed with IACC and Gwynedd Council.</p> <p>The potential for out-migration as a result of the Proposed Development is assessed in the WLIA (Document 5.26).</p> |
| C6. Has the submitted information been useful to help you respond to this consultation? | Much useful information has been prepared as part of the consultation, but there is a lack of detail and evidence on several aspects of the Scheme which is a concern to the Council. | GC 3.20 | This comment is noted and responses to the specific areas highlighted by the Council provided where appropriate in this table. |
| | We will welcome further discussions regarding the matters that are of concern to the Council as noted in Parts 1, 2 and 3 of the Council's response | GC 3.21 | <p>National Grid has proactively engaged with Gwynedd Council during the development of the Project, including via meetings, correspondence and thematic group meetings in relation to the following topics: landscape and visual, ecology, the historic environment, geology and hydrology, traffic and transport, air quality, noise, socio-economic (including tourism), Welsh language, and waste and materials. National Grid continues to work with Gwynedd Council with a view to agreeing a Statement of Common Ground.</p> <p>Detail of the engagement with Gwynedd Council in relation to the environmental impact assessment (EIA)</p> |

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| | | | is provided in Environmental Statement Chapter 5, EIA Consultation (Document 5.5). |
| | Part 3 - Detailed response to all documents that are part of the consultation which have been prepared with the assistance of the ARUP company (this reiterates a) and b) above and is attached. | GC 3.22 | This comment is noted. |
| PART 3 | Gwynedd Council's detailed response to the Section 42 consultation for National Grid's North Wales Connections Project, provided with support from ARUP | | Review of North Wales Connections Project Preliminary Environmental Information Report |
| 1 Introduction | | | |
| | Arup has been commissioned by Gwynedd Council (GC) to provide independent, technical support to inform the Council's continued dialogue with National Grid on the North Wales Connections Project, in accordance with a Planning Performance Agreement (PPA). | GC 4.1 | This comment is noted. |
| | The North Wales Connection Project, as proposed by National Grid, consists of approximately 30km of 400kV grid infrastructure and supporting buildings between Wylfa and Pentir (the Proposed Project) within the administrative boundaries of Isle of Anglesey County Council (IACC) and Gwynedd Council (GC). The Proposed Project is classed as a Nationally Significant Infrastructure Project (NSIP) and will require a Development Consent Order (DCO) application to the Secretary of State. National Grid currently anticipates that the DCO application will be submitted in late 2017. | GC 4.2 | This comment is noted. |
| | This report sets out the response from GC to the Preliminary Environmental Impact Report (PEIR). The PEIR forms part of a suite of documentation being consulted on by National Grid under Section 42 of the Planning Act (2008). The Council welcomes the opportunity to review and appraise submissions made by National Grid relating to their proposals for a new grid connection in North Wales. As a host authority to the development, the Council recognises their key role in assessing the proposals as they evolve in response to National Grid's consultation process. The report draws upon statutory provisions and contemporary pre-application consultation practice for Nationally Significant Infrastructure Projects (NSIPs), in addition to knowledge of previous informal consultation stages of the project dating back to 2010. | GC 4.3 | This comment is noted. |
| | The Council understands that it is imperative that National Grid captures sufficient detail in this formal stage of consultation as, at this time, the Council is unaware of any plans for further formal consultation through which affected communities and interested parties will be able to submit views pre-DCO submission. | GC 4.4 | This comment is noted. |

| Table 2: Gwynedd Council | | | |
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| | GC and IACC have provided responses to other documents within the Section 42 documentation, including the Draft Route Alignment Report, Menai Strait Crossing Report, Preferred Route Option Selection Report and Need Case in separate stand-alone reports. Where appropriate, reference is made to these wider responses within this report. | GC 4.5 | This comment is noted. National Grid's response to the comments of Gwynedd Council on the Draft Route Alignment Report, Menai Strait Crossing Report, Preferred Route Option Selection Report and Need Case are provided in Appendix 33 to the Consultation Report (Document 6.2). |
| 2 Scope of Review | | | |
| | The purpose of the Preliminary Environmental Impact Report, as reported by National Grid, is to provide preliminary information about the potential significant environmental effects of the project and the means of mitigating those effects. The Council understands that the PEIR is the primary means by which National Grid is consulting on the most up-to-date baseline data and project information on which technical commentary can be provided. The Council's comments are made on this basis. | GC 5.1 | This comment is noted. |
| | Gwynedd Council provided comments on the Strategic Options for the route at Stage 2 Consultation in December 2015. These comments have been referenced throughout this report and have been used as a basis for assessing the Adequacy of Consultation at the Section 42 stage (Chapter 23). Comments made at this stage are made without prejudice to further comments made by the Council in due course, as understanding of the project, particularly in reference to on-going consultation required on as yet incomplete Environmental Impact Assessment, is enhanced. | GC 5.2 | This comment is noted. |
| | National Grid should also consider how local communities will be afforded the opportunity to adequately engage in highly complex and detailed information relating to key design decisions in their locality. The Councils are not aware of any previous opportunities for communities or wider stakeholders to engage on the proposed locations of the Sealing End Compounds, Tunnel Head Houses and the Construction Compounds before selection of the preferred locations now determined by National Grid and presented within the suite of Section 42 consultation documents. | GC 5.3 | National Grid has been open in explaining its work and has sought to provide members of the public and stakeholders significant opportunities to influence the proposals. Three defined periods of consultation have been undertaken where people were actively encouraged to provide feedback. The first was undertaken in 2012, followed by a second in 2015 and then the statutory consultation in 2016. Further localised consultation has occurred since then. At each stage, National Grid has put forward a range of options or proposals for people to comment on, and welcomed feedback on any aspect of the Project. The feedback received both during and between consultation stages has been influential in refining the |

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| | | | <p>options considered and influencing the nature of the Project.</p> <p>National Grid ensured that the PEIR contained sufficient information to enable both technical and non-technical consultees to develop an informed view of the likely significant environmental effects of the proposed development and to provide detailed comments on the design and mitigation proposed, as appropriate for that stage and in line with applicable statute, guidance and advice notes.</p> <p>Other information presented by National Grid for the statutory Stage Three Consultation included detailed plans of the Project and technical reports detailing the work undertaken to develop the proposed connection.</p> <p>To aid engagement by the public, the PEIR was presented by section of the route to allow readers to focus on potential effects in geographical areas. Chapter 21 of the PEIR provided a summary of the environmental baseline and potential effects by section of the route, and a non-technical summary of the PEIR was also published.</p> |
| 3 Review of Introductory Chapters | | | |
| 3.1 Project History and Consenting Strategy | <p>National Grid will need to engage with the Councils in pre-application discussions in respect of Town and Country Planning Act applications supporting Associated Development to the DCO. This was requested in response to Scoping, but is not provided in the Section 42 Consultation material. The ES and wider supporting technical documents will need to set out a clear and unambiguous approach to the assessment of all elements of the wider project within the assessment of inter-related and cumulative effects. GC and IACC note that Associated Development applications in Wales would be made under the provisions of the Town and Country Planning Act (TCPA) 1990 to the Councils as Planning Authorities for their areas. The Councils anticipate a good level of pre-application dialogue pursuant to any such applications. These applications made under TCPA will need to include a requisite level of information and detail commensurate with the scale of the</p> | GC 6.1 | <p>In preparation for the Stage One Consultation, National Grid established its preference for an overhead line to provide the second connection between the substations at Wylfa and Pentir, which therefore would be subject to a DCO.</p> <p>Ongoing discussions were held with IACC on the consenting strategy for the Project, with updates provided when practicable. A draft Memorandum of Understanding was submitted for comment prior to the Stage Three Consultation.</p> |

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| | proposed works. A Memorandum of Understanding in respect of the consenting strategy for the project is yet to be agreed in this respect. | | <p>Following Royal Assent of the Wales Bill 2017 on 31st January 2017, it was agreed between IACC, Gwynedd Council and National Grid that a previously drafted Memorandum of Understanding on the route to consent for the North Wales Connection Project was no longer necessary. This was agreed at the Level 2 Planning Performance Agreement meeting held on 24th July 2017.</p> <p>Consent for all elements of the North Wales Connection Project required for the connection between the substations at Wylfa and Pentir have been sought via the DCO application. Works required to the wider North Wales electricity transmission network are subject to their appropriate consents, and considered within the inter-project cumulative effects assessment, part of the ES (Document 5.20).</p> |
| | National Grid note in Chapter 1 of the PEIR that it may be necessary to secure a Marine Licence under the Marine and Coastal Access Act 2009. The Council would welcome clarity on this requirement to ensure that appropriate licences are obtained. | GC 6.2 | The need for a Marine Licence is identified in ES Chapter 9 Ecology and Nature Conservation (Document 5.9). The responsibility of obtaining a Marine Licence will fall on the contractor, and therefore a Marine Licence application will be submitted at a later date. |
| 3.2 Approach to PEIR | Section 1.1.7 of the PEIR states that the PEIR “provides sufficient information to help stakeholders, including the local community, to understand the main environmental effects that could result from the Proposed Project, and to allow an opportunity to comment on the proposed scope of the Environmental Impact Assessment (EIA) (which will ultimately be reported in the Environmental Statement (ES))”. The Council have provided previous representation in response to the North Wales Connection Scoping Report, and draw National Grid’s attention to the Scoping Response provided by the Planning Inspectorate. It is expected however that there would be further engagement of the detailed scope of EIA as part of on-going informal stakeholder engagement, and as part of the PEIR. | GC 6.3 | <p>National Grid has proactively engaged with Gwynedd Council during the development of the Project, including via meetings, correspondence and thematic group meetings in relation to the following topics: landscape and visual, ecology, the historic environment, geology and hydrology, traffic and transport, air quality, noise, socio-economic (including tourism), Welsh language, and waste and materials. National Grid continues to work with Gwynedd Council with a view to agreeing a Statement of Common Ground.</p> <p>National Grid shared a draft ES with Gwynedd Council, receiving detailed comments which were able</p> |

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| | | | <p>to be considered and taken in to account where appropriate in finalising the ES.</p> <p>Detail of the engagement with Gwynedd Council in relation to the environmental impact assessment (EIA) is provided in Environmental Statement Chapter 5, EIA Consultation (Document 5.5).</p> |
| | Generally, throughout the PEIR there is a lack of detailed information and commitment to mitigation that may be required to reduce impacts. It is essential that mitigation measures be consulted on prior to DCO submission. | GC 6.4 | National Grid shared a draft ES with Gwynedd Council, receiving detailed comments which were able to be considered and taken in to account where appropriate in finalising the ES. |
| | <p>Paragraph 2.2.11 of the PEIR Chapter 1 states that:</p> <p><i>"Detailed information, such as the methodologies being used to gather baseline information, and planning policy background, have been specifically excluded in order to maintain the focus and conciseness of the report."</i></p> <p>It is expected that where common ground may be sought with the local planning authority regarding survey methodologies and planning policy, further consultation material will be provided prior to DCO submission.</p> | GC 6.5 | <p>National Grid has proactively engaged with Gwynedd Council during the development of the Project, including via meetings, correspondence and thematic group meetings. National Grid continues to work with Gwynedd Council with a view to agreeing a Statement of Common Ground.</p> <p>National Grid shared a draft ES with Gwynedd Council, receiving detailed comments which were able to be considered and taken in to account where appropriate in finalising the ES.</p> |
| 3.3 Project Description | <p>Chapter 2 provides a factual and concise summary of strategic options development, route selection and appraisal to date. It does not however acknowledge or address concerns raised by the Council at Stage 2 Consultation or at Scoping. It is considered essential that comments from statutory and non-statutory bodies are tracked and responded to in a transparent manner to fulfil National Grid's duty to consult on the project. The Council's consultation comments raised previously relate to;</p> <ul style="list-style-type: none"> Inadequate assessment of cumulative and whole project (end to end rather than discrete section by section) effects; Landscape assessment methodology; | GC 6.6 | <p>The Consultation Report (Document 6.1) provides details of consultation undertaken throughout the course of the project, a summary of the feedback received and how National Grid has had regard to it.</p> <p>Detail of the engagement with Gwynedd Council in relation to the environmental impact assessment (EIA), including Scoping, is provided in Environmental Statement Chapter 5, EIA Consultation (Document 5.5).</p> |

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| | <ul style="list-style-type: none"> Potential impacts on tourism; Potential impacts on nature conservation; Heritage impacts; and Cost calculations and appraisal methodology for strategic options. | | |
| | <p>The Council sees ongoing back-checking in regards to costs as essential. National Grid should update the cost calculations for all Strategic Options in the light of new and more detailed information. The updated costs should be presented in a clear and transparent manner with a breakdown of the various elements. This is essential in order to make proper and up to date comparisons between the different options.</p> | GC 6.7 | <p>As part of its ongoing back-check process National Grid has updated its Strategic Options Report (Document 7.2), which provides details of the strategic options considered, including subsea connections, and the reasons for selecting the preferred option.</p> <p>The Strategic Option Report costs are early stage indicative estimates of the construction, capital and lifetime costs to allow a high level cost comparison of options. They are based on a high level scope of works defined for each Strategic Option in respect of each technology option that is considered to be feasible. This is considered appropriate to the strategic options stage of the project development process.</p> <p>The 2018 Strategic Options Report (Document 7.2) demonstrates that even when the additional costs identified through detailed design (including the tunnel in the area of the Menai Strait) are added to the cost of the overhead line Strategic Option 3, there is still a significant cost differential between the preferred Strategic Option and the alternatives.</p> <p>Following consideration of environmental, community, cost and technical factors, National Grid considers that the most appropriate option for the majority of the route between Wylfa and Pentir is an overhead line. National Grid considers that the Project would fulfil its statutory duties and complies with national planning policy. The Strategic Options Report (Document 7.2)</p> |

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| | | | contains further information on this decision. The Planning Statement (Document 7.14) sets out how the Project complies with national planning policy. |
| | It is noted that the cost estimates associated with the Menai Straits crossing have increased considerably from £30-50m at initial Strategic Options appraisal, to £170m at this current consultation stage. The Councils have provided detailed comments in respect of the Strategic Options Report under a separate cover. | GC 6.8 | National Grid's response to the comments of Gwynedd Council on the Strategic Options Report and Need Case are provided in Appendix 33 to the Consultation Report (Document 6.2). |
| | As requested at Section 2 Consultation, the Council requests that National Grid provide cost estimates for extending the tunnel from its current proposed location, to the proposed substation at Pentir. The cost for undergrounding the full route to Pentir should be reviewed in the context of the wider project, including the environmental and socio-economic impacts of alternative route and technology options. It is considered that the documents provided at Section 42 Consultation have not addressed the concerns set out by the Council relating to the need to back-check the Strategic Options and route development, including mitigation by undergrounding. | GC 6.9 | National Grid's response to the comments of Gwynedd Council on the Strategic Options Report and Need Case are provided in Appendix 33 to the Consultation Report (Document 6.2). As part of its ongoing back-check process National Grid has updated its Strategic Options Report (Document 7.2), which provides details of the strategic options considered, including subsea connections, and the reasons for selecting the preferred option. National Grid's response to undergrounding the overhead line in Gwynedd is provided under Reference Coe GC 2.2 above. |
| 3.4 Construction, Operation, Maintenance and Decommissioning | | | |
| | Chapter 4 helpfully sets out the proposed methods for Construction, Operation, Maintenance and Decommissioning of specific elements of the project. It does however lack any information regarding the construction and decommissioning of temporary works including highways improvement, and temporary construction compounds. Further detail should be provided to ensure impacts are assessed and appropriate mitigation secured. | GC 7.1 | Information regarding proposed Construction Compounds is provided in Chapter 4 Construction, Operation, Maintenance and Decommissioning of the Proposed Development (Document 5.4). Potential effects of the construction and decommissioning of temporary works, including highways improvements and temporary construction compounds, have been considered and assessed where appropriate in the ES. |
| | The chapter also lacks detail regarding any post-construction restoration proposals. The Council should be consulted on a method statement for re-instatement proposals, including | GC 7.2 | Restoration proposals are reported in Chapter 4 Construction, Operation, Maintenance and |

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| | any environmental mitigation and control measures proposed. A section providing specific proposals for post-construction restoration should also be provided within the ES. | | Decommissioning of the Proposed Development (Document 5.4). The OSMP (Document 7.10), which forms part of the Construction Environmental Management Plan (CEMP) (Document 7.4), sets out the general methods for handling, excavation, storage and reinstatement of soils and peat. The CEMP also contains the following reinstatement commitment: <i>'To facilitate the reinstatement of land, soil and watercourses, pre-condition surveys will be discussed with landowners and where agreed, carried out of land within working areas. This will include a photographic record, written description and topographical survey, which will be used to ensure a complete and accurate reinstatement of land'</i> . As the pre-condition surveys would not be undertaken until after the DCO is in place, the results cannot be provided in the ES as requested. |
| | A high level construction programme is presented in Appendix 4.1. It would be helpful if this were developed in more detail, to include pre-construction mitigation works and geographical phasing of works for the purposes of DCO submission. | GC 7.3 | A high level construction programme is provided in Chapter 4 Construction, Operation, Maintenance and Decommissioning (Document 5.4). |
| | The Council welcomes the provision of a draft Construction Environmental Management Plan (CEMP) as Appendix 4.1 to the PEIR. The CEMP identifies best practice environmental measures which National Grid commit to as an integral part of the project. It is expected that the CEMP will be updated and refined during the design of the project, to incorporate design evolution and further information made available as part of the EIA, including additional mitigation identified during the EIA. National Grid note that the CEMP reflects proven methods on National Grid projects. It is important that these are kept under review in line with lessons learned from other major infrastructure projects. | GC 7.4 | Noted, the updated CEMP is provided as Document 7.4 . |
| | As set out by the Council at Scoping, further rationale is required to justify the proposed construction working hours, as this differs from those agreed at the Hinkley Point C Connections Project as a contemporary transmission project example, and should be relevant to local impact assessment and circumstances. The Council wishes to understand in particular the likely effects of weekend working in relation to local socio-economic and tourism impact, and what control measures might be employed to minimise effects. The Council would also expect limitations on noisy activities (such as piling) during working | GC 7.5 | An OCTMP (Document 7.5) has been developed, alongside the CEMP (Document 7.4), which details the way the construction traffic will route in order to construct the scheme. A specialist AIL contractor has developed an AIL report which is included as an Annex to the Transport Assessment. This report outlines how AILs (including one transporting the |

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| | hours to be further defined. The CEMP proposes that there may be circumstances in which activities take place outside core working hours. It is expected that these circumstances will be clearly defined and include exclusions for noisy activities, such as cable cutting. The impacts of construction of the Menai Strait crossing, particularly for local receptors in the vicinity of proposed Sealing End Compound (SEC) and Tunnel Head House (THH) within Gwynedd are yet to be understood, and it is imperative that the CEMP be used to secure appropriate mitigation measures. The CEMP also notes that deliveries may take place outside core working hours. It is expected that a plan for mitigation of traffic impacts will be detailed in a Transport Management Plan, to be developed in consultation with the Council. Such a plan is likely to include scheduling of deliveries and specified hours under which deliveries will be permitted to take place. Careful consideration should also be given to the movement of the proposed Tunnel Boring Machine, which as an Abnormal Indivisible Load (AIL) will require specific delivery methodology agreed with GC as Local Highways Authority together with the possible movement associated with the removal of excavations from tunnelling operations. | | <p>tunnel boring machines) will access key working areas.</p> <p>The potential effect of noise and traffic on commercial and tourism receptors has been assessed and is presented in Chapter 17 Socio-Economics (Document 5.17), Sections 8 and 9 and the Amenity Assessment (Appendix 17.1 – Document 5.17.2.1).</p> <p>Construction working hours are set out in DCO Requirement 8 (Document 2.1), which was discussed with both IACC and Gwynedd Council.</p> |
| | Generic guidelines for the provision of lighting should be developed further in consideration of the outcomes of the EIA to include specific requirements to manage potential environmental impacts. | GC 7.6 | Control and Management Measures (CMM) to reduce light pollution is provided in the CEMP (Document 7.4). |
| | National Grid state that a “Materials Management Plan (MMP) will be developed to ensure that spoil (excavations) removed from the launch site during the excavation of the tunnel is removed from site appropriately”. The provision of the MMP is welcome and indeed essential to manage the anticipated significant quantities of spoil (excavation) arising. The Council would urge a steering group be set up in preparation of this key document as it is developed prior to DCO application. Within the steering group the Council could engage with the developer in identifying sources and providers of aggregates and mineral materials together with potential sites for processing/disposal of waste and storage of stockpiles on Anglesey, Gwynedd, North Wales in the scheme's development (construction and post construction phases). | GC 7.7 | <p>A Materials and Waste Management Steering Group has been established and met on a number of occasions to discuss the details prior to submission of the DCO application. Please refer to Chapter 5, EIA Consultation (Document 5.5).</p> <p>An OMMP (Document 7.12) is included with the application. A draft OMMP was provided to IACC for comment prior to submission of the DCO for comment.</p> |
| | The CEMP outlines general mitigation commitments that will be secured during the construction stage. This includes measures for noise and air quality mitigation. These are intended to represent generic best practice and should be supplemented with project-specific measures in accordance with the findings of the EIA. | GC 7.8 | The generic measures in the CEMP (Document 7.4) have been supplemented with project specific measures in the Noise and Vibration Management Plan (Document 7.9) and measures proposed in section 9 of ES Chapter 15, Construction Noise and Vibration (Document 5.15), drawing on the findings of the EIA |

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| | As set out at Scoping, the commitments to pollution control, inspections and incident procedures including a Pollution Incident Control Plan are welcomed by the Council. It is expected that these measures be developed in consultation with Natural Resources Wales and secured by way of DCO Requirement. | GC 7.9 | Consultation with stakeholders, including NRW, has helped the development of the CEMP (Document 7.4), secured by Requirement 7, which includes appropriate commitments to pollution control. |
| | The CEMP (App 4.1) notes that a materials management plan is to be developed. Such a management plan should be submitted and referred to within the ES so as to address the volume, geology and time frame for extraction of tunnel arisings and wastes generated and suitability for use within the overall project - material for construction of temporary haul roads, concrete, compound surfacing etc. The storage of arisings will also need to be addressed within the LVIA if large stockpiles of material are to be stored on site (Should this be considered within chapter 18 - Intra-project effects). In the preparation of the MMP it is recommended that an oversight group is set up with relevant stakeholders to oversee the delivery and management arrangements for waste and materials for reuse on the National Grid project and on possible third party sites, or the transfer of wastes/materials for further processing or disposal by the local/regional waste management infrastructure. Such consideration will also need to be addressed within Chapter 4 - Construction, Operation, Maintenance and Decommissioning of the proposed | GC 7.10 | <p>A Materials and Waste Management Steering Group has been established and met on a number of occasions to discuss the details prior to submission of the DCO application. Please refer to Chapter 5, EIA Consultation (Document 5.5).</p> <p>An OMMP has been prepared (Document 7.12), which considers the project life cycle of the materials required temporarily and their subsequent removal and end use.</p> <p>A draft OMMP was provided to Gwynedd Council for comment prior to submission of the DCO for comment.</p> <p>Consideration of the effects of the storage of arisings/ stockpiles of material are considered in the assessment of construction effects in both ES Chapter 7, Landscape Assessment (Document 5.7) and Chapter 8, Visual Assessment (Document 5.8).</p> |
| 4 Approach to PEIR (Chapter 5) | | | |
| | The approach to PEIR set out in Chapter 5 provides a helpful and appropriate framework for the detailed methodologies that follow within the assessment chapters, noting that assessment methodologies are adapted as appropriate to the topic disciplines. | GC 8.1 | This comment is noted. |
| | It is noted that the maturity of the impact assessment presented in the PEIR varies across topic disciplines, as a reflection of incomplete survey programmes at this stage. Where it has not been possible to undertake a quantitative assessment of predicted impacts at this stage, the Council's ability to meaningfully engage on assessment outcomes and proposed mitigation measures is limited. It is expected that this will be addressed through further consultation prior to DCO submission on the emerging outcomes of the EIA. National Grid states that 'mitigation measures have not all been defined or designed'. It is essential that | GC 8.2 | <p>National Grid shared a draft ES with Gwynedd Council, receiving detailed comments which were able to be considered and taken in to account where appropriate in finalising the ES.</p> <p>Mitigation measures reported in technical chapters of the ES (Document 5.7–5.18) have been refined since</p> |

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| | such measures are consulted on prior to DCO submission. Whilst it is recognised that various elements of the EIA are at different stages of maturity, it is essential that the Council are consulted on the outputs of the cumulative assessment, including mitigation. | | the publication of the PEIR. IACC and Gwynedd Council have been consulted on the outputs of the cumulative assessments, including mitigation, as documented in Chapter 5 of the Environmental Statement, EIA Consultation (Document 5.5). |
| | In paragraph 2.4.3 National Grid sets out the roles of the CEMP, which provides a limited interpretation from the perspective of the Council. As highlighted at Scoping, the Council expects the Construction Environmental Management Plan (CEMP) to be a live document, which will be consulted upon and updated in view of the emerging outcomes of the EIA, alongside a number of detailed method statements to secure environmental control measures. | GC 8.3 | The CEMP (Document 7.4) has been regularly updated to take into account the emerging findings of the EIA, and drafts shared with Gwynedd Council for comment. It is supported and accompanied by a number of other detailed management and method statements. |
| | Paragraph 2.4.8 could be expanded on further to clarify the potential role of offsite mitigation, and enhancement opportunities which may be important aspects of the evolving project design. It should be noted that archaeological mitigation does not fall neatly into these descriptions. Whilst preservation in situ of below ground archaeological remains can sometimes be ensured by avoidance (Design), preservation by record of below ground archaeological remains affected by ground disturbing work is a more complex procedure involving excavation, post-excavation, reporting, publication and dissemination of results, usually through public engagement, education or other means. Also, setting impacts on archaeological sites or monuments are not easily mitigated - planting or screening is rarely appropriate in these circumstances. In such cases National Grid will need to consider access, interpretation, management and conservation of monuments in Paragraph 2.4.8 could be expanded on further to clarify the potential role of offsite mitigation, and enhancement opportunities which may be important aspects of the evolving project design. | GC 8.4 | Archaeological mitigation is set out in ES Chapter 10 Historic Environment and also in the Archaeological Strategy (Document 7.8). Enhancement opportunities, including those related to the historic environment, are included within the Enhancement Strategy (Document 7.13), a draft of which was provided to Gwynedd Council prior to submission of the DCO for comment. |
| | Paragraph 2.4.9 states that 'Compensation measures are used when the above mitigation measures cannot be implemented for any reason.' This fails to recognise the role of compensation or enhancement to achieve wider benefit, such as net biodiversity gain. Further dialogue would be expected in relation to mitigation, enhancement and compensation opportunities to be secured by way of Requirements and Obligations. | GC 8.5 | Enhancement opportunities are included within the Enhancement Strategy (Document 7.13), a draft of which was provided to Gwynedd Council prior to submission of the DCO for comment. |
| | The commentary regarding Rochdale Envelope in paragraph 2.5 is helpful. It is important the Rochdale Envelope and its implications on the EIA are clearly defined, and informed by on-going dialogue with the Council. The Council urges caution where potential effects are scoped out, before the limits of deviation are fully defined, or defined with a large degree of flexibility at this stage. | GC 8.6 | This comment is noted. |

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| | National Grid have defined a number of temporary working areas. It is important that all temporary working areas are defined and assessed within the EIA and the Council seeks assurance that this will be the case in the final ES. | GC 8.7 | Details on temporary working areas are provided in Section 3.14 of ES Chapter 3 Description of the Proposed Development (Document 5.3). Temporary working areas are illustrated on Figure 4.1 Construction Plans (Document 5.4.1.1). |
| | Section 5 does not set out the approach to be applied for future baseline scenarios, although the role of the future baseline is briefly acknowledged in respect of the Wylfa Newydd Project. The Council expects that assumptions relating to future baseline will be clearly set out in the EIA. | GC 8.8 | Assumptions relating to future baseline are set out in section 4 Methodology of each of the technical chapters of the ES (Documents 5.7 to 5.18) |
| 5 Policy Framework | | | |
| | The information provided by National Grid regarding Policy Context within the PEIR is somewhat limited, and has been appraised by National Grid elsewhere in the Section 42 documentation. The Council has responded to these documents and the policy contained therein under a separate cover. It is expected that the ES will draw together this information and address the points raised by the Council regarding these documents. | GC 8.9 | This ES takes into considerations the Council's responses regarding Policy Context where relevant. The Policy Context of the Proposed Project is detailed in Section 2 of technical chapters in the ES (Document 5.7-5.18). |
| | The policy context should make reference to the Holford Rules and Horlock Rules, and importantly recognise the role of the Anglesey and Gwynedd Joint Local Development Plan and local planning policy framework as a material consideration in assessing local environmental impacts. | GC 8.10 | The Planning Statement (Document 7.14) outlines how the Proposed Development has complied with local planning policies, including the JLDP. The Design Report (Document 7.17) details outlines how the Proposed Development has complied with the Holford Rules and the Horlock Rules. |
| | The Councils note National Grid's Stakeholder, Community and Amenity Policy, including in particular; <ul style="list-style-type: none"> “Offsetting where mitigation is not practical” which “could include landscaping and planting works or other benefits to affected communities”; “Enhancing the environment around our works” which will “consider what practicable measures can be taken to enhance areas in the vicinity of <i>the works for the benefit of local communities and the natural environment.</i>”; and “Working with others” to “create an environment where best practice can be shared and delivered”. | GC 8.11 | Enhancement opportunities are included within the Enhancement Strategy (Document 7.13), a draft of which was provided to Gwynedd Council prior to submission of the DCO for comment. |

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| | The Councils seek further information to understand how these commitments will be fulfilled. It is expected that a Mitigation Strategy and further proposals for compensation and enhancement be consulted on prior to DCO submission. | | |
| | <p>The Councils draw the following policy framework to the attention of National Grid in respect of the concerns set out in this consultation response.</p> <p>National Policy Statement EN-1 states in Section 4.2.4 that <i>“When considering a proposal the IPC should satisfy itself that likely significant effects, including any significant residual effects taking account of any proposed mitigation measures or any adverse effects of those measures, have been adequately assessed.”</i> The EIA is not yet at the stage of maturity to meet this criteria, and further consultation is therefore required prior to DCO submission.</p> | GC 8.12 | Consultation has been ongoing and has included issue of all draft technical chapters (Documents 5.7 to 5.18) to key technical stakeholders for comment. |
| | Section 4.2.6 of EN-1 states that <i>“The IPC should consider how the accumulation of, and interrelationship between, effects might affect the environment, economy or community as a whole, even though they may be acceptable when considered on an individual basis with mitigation measures in place.”</i> Again, further work is required for the assessment of inter-project and intra-project effects, as a coherent methodology is yet to be set out. | GC 8.13 | Consultation has been ongoing and has included issue of all draft technical chapters (Documents 5.7 to 5.18) to key technical stakeholders for comment, alongside chapters 19, 20 and 21 on inter, intra and combined effects. |
| | Section 5.3.18 of EN-1 states that <i>“The applicant should include appropriate mitigation measures as an integral part of the proposed development.”</i> The definition of mitigation measures within the PEIR is limited, and fails to recognise the role of compensation measures and enhancement opportunities. Such opportunities have not been presented within the PEIR. National Grid state in Chapter 5 of the PEIR that 'Compensation measures are used when the above mitigation measures cannot be implemented for any reason.' This fails to recognise the role of compensation or enhancement to achieve wider benefit, such as net biodiversity gain. Further dialogue would be expected in relation to mitigation, enhancement and compensation opportunities to be secured by way of Requirements and Obligations. | GC 8.14 | <p>Mitigation measures and residual effects are presented in Section 9 of technical chapters in the ES (Document 5.7-5.18). A Schedule of Mitigation (Document 5.28) has been prepared, providing all the mitigation requirements for the Proposed Development.</p> <p>Enhancement requirements have been identified as documented in the Enhancement Strategy (Document 7.13), a draft of which was provided to Gwynedd Council prior to submission of the DCO for comment.</p> |
| | <p>Attention is drawn to the requirements of Schedule 4 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 states that an ES should include:</p> <p><i>“A description of the likely significant effects of the development on the environment, which should cover the direct effects and any indirect, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative effects of the development, resulting from:</i></p> | GC 8.15 | The ES (Volume 5) reports the likely significant effects of the Proposed Development, covering all relevant matters set out within Schedule 4 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 |

| Table 2: Gwynedd Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p><i>(a) The existence of the development;</i></p> <p><i>(b) The use of natural resources;</i></p> <p><i>(c) The emission of pollutants, the creation of nuisances and the elimination of waste,</i></p> <p><i>And the description by the applicant of the forecasting methods used to assess the effects on the environment.”</i></p> | | |
| 6 Landscape Assessment | | | |
| | This section refers to Chapter 6 of the PEIR – Landscape Assessment. | GC 9.1 | This comment is noted. |
| | <p>The Council notes that the preliminary nature of the chapters presented makes it hard to understand the level of detail and the scale of the assessment which will be undertaken and presented in the ES. Additionally, there is little in the way of information regarding the embedded/primary mitigation measures proposed and construction mitigation measures. There are no secondary mitigation or enhancement measures presented in the material to date. It is therefore recommended that a further interim consultation including the Councils is carried out on a draft of the ES assessment with mitigation proposals prior to submission of the DCO.</p> | GC 9.2 | <p>This comment is noted.</p> <p>The landscape and visual assessments are presented in Chapter 7, Landscape Assessment (Document 5.7) and Chapter 8, Visual Assessment (Document 5.8). Agreed viewpoint locations are presented in Appendix 8.2, Viewpoint Assessment (Document 5.8.2.2).</p> <p>Mitigation in the form of reinstatement is included within the CEMP (Document 7.4) and shown on Figure 1 Reinstatement Plans (Document 7.4.1.1).</p> <p>Figures 7.12-7.16 Landscape Mitigation Proposals (Document 5.7.1.12-5.7.1.16) present more detailed information on the specification of proposed mitigation planting.</p> <p>These embedded mitigation measures have been assessed as part of the Proposed Development and include for example, planting around the CSEC/THH, in-situ planting such as replacement of hedgerows and boundaries post construction and tree replacement and planting within the Order Limits.</p> <p>Secondary measures fall under the umbrella of ‘enhancement’ as these cannot be guaranteed.</p> |

| Table 2: Gwynedd Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | <p>Enhancement measures have been considered separately to the EIA as these would be undertaken by voluntary agreement; such measures include consideration of wider landscape enhancement e.g. restoration of boundaries such as cloddiau that are not directly affected by the Proposed Development and planting of trees and woodland in the wider landscape. In addition, planting would be offered to residential receptors in the form of a Voluntary Residential Planting Scheme (VRPS). This would include the offer of planting to reduce/ minimise visual effects for eligible properties identified during the assessment.</p> <p>Enhancement measures along with the VRPS are presented in the Enhancement Strategy (Document 7.13), a draft of which was provided to Gwynedd Council prior to submission of the DCO for comment.</p> |
| | The Council notes that there are no specific judgements made in the narrative text in respect of on the Value and Susceptibility of the landscape leading up to the baseline assessment of landscape sensitivity. As per Para 1.5.23 and 1.5.27 in Appendix 6.1 Landscape Methodology, these should be described in the text. | GC 9.3 | <p>Landscape value and susceptibility to the Proposed Development has been considered in detail for each LANDMAP Visual and Sensory Aspect Area (VSAA) within the study area(s).</p> <p>Judgements regarding landscape value and susceptibility are found in Appendix 7.2 VSAA Character Assessment (Document 5.7.2.2).</p> |
| | Paragraph 1.5.3 in Appendix 6.1 categorises landscape receptors by elements, character and designations. The Baseline section describes the character areas and designations in adequate detail for this stage, however the elements which make up the landscape are not clearly described or assessed in the baseline. The Council notes that the structure of the Landscape Baseline in respect of Section F differs in approach from that in the other sections. Sensitivity is described in respect of each element of the development as opposed to each character area in the other sections. This makes the assessment hard to follow. | GC 9.4 | <p>This comment is noted and the structure of the assessments amended.</p> <p>Section 7 of Chapter 7, Landscape Assessment (Document 5.7) provides a description of landscape elements. An assessment of the effects of the Proposed Development is made in respect to these elements can be found in Section 9.</p> |
| | The Council notes that the PEIR Assessment has been carried out on the fewer and larger scale Landscape Character Areas (LCAs) and, whilst this scale of assessment may be | GC 9.5 | ES Chapter 7, Landscape Assessment (Document 5.7) and Appendix 7.2 VSAA Character Assessment (Document 5.7.2.2) provide a detailed assessment at |

| Table 2: Gwynedd Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | appropriate at an early stage of the assessment, it is considered essential that the EIA is carried out at the finer LANDMAP Aspect area scale. | | VSAA level. LCA information has been retained in Appendix 7.3 (Document 5.7.2.3) to understand effects in relation to the LCAs, but the assessment has been carried out using the smaller VSAA's. |
| | As highlighted in previous rounds of consultation, if the loss of vegetation, including ancient woodland is to be scoped out of operational effects assessment and instead dealt with under construction effects, consideration needs to be given to the permanent nature of this aspect of the construction. Paragraph 5.2 states that these effects are ' <i>Not considered to be significant in landscape terms due to their temporary nature...</i> ' The same paragraph then goes on to cite as further justification of these as temporary effects due to ' <i>...the fact that the areas will be restored following completion of the proposed project</i> '. The Council suggests that the ES needs to be clear as to the short, medium and long term nature of these effects and about whether the restoration ' <i>taken in this context to include replacement planting</i> ' is considered as mitigation and, if so, whether this is for construction or operational effects. | GC 9.6 | <p>The temporary and permanent loss of vegetation has been assessed as part of the construction effects in both ES Chapter 7, Landscape Assessment (Document 5.7) and Chapter 8, Visual Assessment (Document 5.8). Where loss of woodland is considered more permanent in nature (in the sense it cannot be replaced in situ) this is acknowledged in assessment of operational effects.</p> <p>Mitigation in the form of reinstatement is included within the CEMP (Document 7.4) and shown on Figure 1 Reinstatement Plans (Document 7.4.1.1).</p> <p>Figures 7.12-7.16 Landscape Mitigation Proposals (Document 5.7.1.12-5.7.1.16) present more detailed information on specification of proposed mitigation planting.</p> |
| | The Council notes that landscape restoration can in many circumstances take a considerable amount of time to establish. In EIA, this establishment period is often assumed to be 15 years and thus effects before it is established are considered to be long term. | GC 9.7 | Chapter 7, Landscape Assessment (Document 5.7) and Chapter 8, Visual Assessment (Document 5.8) consider effects at Year 1 and Year 15 in order to show how planting affects the long-term residual effects of the Proposed Development. |
| | The Council notes that the EIA will need to address disposal / treatment / management of the considerable amount of spoil / excavated material arising as a result of the construction of the tunnel. Information has not yet been provided on the type of material that will be excavated and the amount that could be reused and the amount that needs to be disposed of / recovered as possible landscape mitigation. This needs to be considered within the overall development and its resultant environmental effects, and how it is anticipated to be transported and disposed of. The Council is therefore unable to make a judgment on whether the localised effects on the character of the local landscape are likely to be significant or not. | GC 9.8 | <p>Spoil/ excavated materials would be used in the areas around the CSEC/THH and Pentir to recontour the landform to reduce the amount of spoil requiring off-site disposal and give additional height to areas of planting to decrease the time within which screening would become effective.</p> <p>Contours are shown on the Design Plans (Document 4.13).</p> |

| Table 2: Gwynedd Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | The Council anticipate that some landscape mitigation would be provided across the development to restore any damaged landscape elements and to integrate the development in to the landscape. This will be particularly important in the sensitive landscape around the Menai Strait and around ancillary infrastructure such as SECs and Substations. | GC 9.9 | <p>Mitigation in the form of reinstatement is included within the CEMP (Document 7.4) and shown on Figure 1 Reinstatement Plans (Document 7.4.1.1).</p> <p>Figures 7.12-7.16 Landscape Mitigation Proposals (Document 5.7.1.12-5.7.1.16) present more detailed information on specification of proposed mitigation planting.</p> <p>These embedded mitigation measures have been assessed as part of the Proposed Development and include for example, planting around the CSEC/THH, in-situ planting such as replacement of hedgerows and boundaries post construction and tree replacement and planting, all within the Order Limits.</p> |
| | The Council considers that effects from noise, wildlife and habitats, and cultural heritage, amongst others, may combine and lead to overall greater effects on the character of the landscape (LANDMAP Aspect Areas) and on other designated landscape. It is therefore essential that GC is consulted on a draft ES, including thorough cumulative impacts assessment and holistic mitigation measures in advance of DCO submission. | GC 9.10 | A full Cumulative Effects Assessment (CEA) on the inter-project effects is provided in Chapter 20, Inter-Project Cumulative Effects (Document 5.20). |
| 7 Visual Assessment | | | Visual |
| | This section refers to Chapter 7 of the PEIR – Visual Assessment. | GC 10.1 | This comment is noted. |
| | As is the case with the Landscape Assessment, the preliminary nature of the chapters presented make it hard to understand the level of detail and the scale of the assessment which will be undertaken and presented in the ES. Additionally, there is little in the way of information regarding the embedded/primary mitigation measures proposed and construction mitigation measures. There are no secondary mitigation or enhancement measures presented in the material to date. It is therefore recommended that a further interim consultation is carried out on a draft of the ES assessment with mitigation proposals prior to submission of the DCO. | GC 10.2 | <p>Mitigation in the form of reinstatement is included within the CEMP (Document 7.4) and shown on Figure 1 Reinstatement Plans (Document 7.4.1.1).</p> <p>Figures 7.12-7.16 Landscape Mitigation Proposals (Document 5.7.1.12-5.7.1.16) present more detailed information on specification of proposed mitigation planting.</p> <p>These embedded mitigation measures have been assessed as part of the Proposed Development and include for example, planting around the CSEC/THH, in-situ planting such as replacement of hedgerows</p> |

| Table 2: Gwynedd Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | <p>and boundaries post construction and tree replacement and planting, all within the Order Limits.</p> <p>Secondary measures fall under the umbrella of 'enhancement' as these cannot be guaranteed. Enhancement measures have been considered separately to the EIA as these would be undertaken by voluntary agreement; such measures include consideration of wider landscape enhancement e.g. restoration of boundaries such as cloddiau that are not directly affected by the Proposed Development and planting of trees and woodland in the wider landscape. In addition, planting would be offered to residential receptors in the form of a Voluntary Residential Planting Scheme (VRPS). This would include the offer of planting to reduce/ minimise visual effects for eligible properties identified during the assessment.</p> <p>Enhancement measures along with the VRPS are presented in the Enhancement Strategy (Document 7.13), a draft of which was provided to Gwynedd Council prior to submission of the DCO for comment.</p> |
| | The Council considers it unclear how temporary and permanent vegetation loss as a result of the construction activity will be considered in the assessment. | GC 10.3 | The temporary and permanent loss of vegetation has been assessed as part of the construction effects of the Proposed Development. Where loss of woodland is permanent (in the sense it cannot be replaced in situ) this is acknowledged in Chapter 8 Visual Assessment (Document 5.8). |
| | Appendix 7.1 paragraph 1.3.13 only refers to Appendix 4.2, which describes a strategy for construction mitigation through reinstatement. Neither here nor in Chapter 4 of the PEIR is there any primary or secondary mitigation described. The second sentence of this section suggests this will be presented in an Environmental Strategy and Masterplan, submitted with the final ES. The Council consider it imperative that this is consulted upon as early in the programme as possible. | GC 10.4 | <p>Mitigation in the form of reinstatement is included within the CEMP (Document 7.4) and shown on Figure 1 Reinstatement Plans (Document 7.4.1.1).</p> <p>Figures 7.12-7.16 Landscape Mitigation Proposals (Document 5.7.1.12-5.7.1.16) present more detailed information on specification of proposed mitigation planting.</p> |

| Table 2: Gwynedd Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | <p>These embedded mitigation measures have been assessed as part of the Proposed Development and include, for example, planting around the CSEC/THH, in-situ planting such as replacement of hedgerows and boundaries post construction and tree replacement and planting, all within the Order Limits.</p> <p>Enhancement measures along with the VRPS are presented in the Enhancement Strategy (Document 7.13), a draft of which was provided to Gwynedd Council prior to submission of the DCO for comment.</p> |
| | The Council notes, in Appendix 7.1 paragraph 1.5.14 and 1.6.4, that dual use of the term 'sequential' to describe two different types of receptors/effects is confusing, and suggest that an alternative term such as 'successive' or 'consecutive' be used to describe views which vary along the length of a route. | GC 10.5 | This comment is noted. |
| | The Council notes that no methodology has been presented for the assessment of residential amenity, which will feed into the Residential Amenity Assessment. It is essential that this be consulted on prior to DCO submission. | GC 10.6 | The methodology for the Residential Visual Amenity Assessment can be found in Section 4 of Chapter 8, Visual Assessment (Document 5.8). |
| | The lists in paragraphs 4.1.1 and 4.1.10 of the Chapter are duplicated and inconsistent. The Council suggest that the ES also considers outdoor recreational sports receptors and people at their place of work, schools, tourism based businesses such as museums, hotels and pubs/restaurants with outdoor seating and anglers amongst others. | GC 10.7 | This comment has been noted. Within Chapter 8, Visual Assessment (Document 5.8) these receptors have been considered as part of the communities assessment with references made to specific receptors where required. The visual assessment has also informed Chapter 17, Socio-economics (Document 5.17) chapter and a full list of tourism and business receptors has been provided by the socio-economic team to ensure they are assessed within Chapter 8, Visual Assessment (Document 5.8). |
| | As per comments in the Council's comments in relation to the Appendix 5.3 of the Scoping Report (Residential Visual Amenity Assessment Methodology), clarification is required as to how the magnitude of change is assessed and whether the visual effects will be assigned a significance rating. | GC 10.8 | The methodology for the Residential Visual Amenity Assessment can be found in Section 4 of Chapter 8, Visual Assessment (Document 5.8). |
| 8 Ecology and Nature Conservation | | | Ecology |

| Table 2: Gwynedd Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | This section refers to Chapter 8 of the PEIR – Ecology and Nature Conservation. | GC 11.1 | This comment is noted. |
| | The Council notes that the Natural Environment and Rural Communities Act has been superseded in Welsh legislation by the Environment Act (Wales) 2016 and requests that National Grid ensure up to date policy and legislation is used throughout the consultation documents. | GC 11.2 | Noted. Documents have been updated |
| | Paragraph 3.3.34 states that Collision Risk Modelling (CRM) is ‘likely to be required’ however the Council expects that a thorough consideration of collision risk is presented in the ES, with reference to the new Scottish Natural Heritage guidance on avian collision and overhead lines. This will enable a more robust assessment of potential collision risk to key species. | GC 11.3 | This has been addressed within ES Chapter 9, Ecology and Nature Conservation (Document 5.9) and its associated appendices, where full baseline results have been provided. The chapter sets out why the SNH guidance is not appropriate for the assessment of the Proposed Development. Discussions on the agreed approach to assessing collision risk have occurred with Councils and NRW prior to the ES submission. |
| | Paragraph 3.3.43 refers to the project providing net biodiversity gain under PPW guidance however there is little content within the PEIR to suggest how this will be achieved. Further discussions are expected in advance of the ES in addition to complete details on how such gains will be delivered within the DCO application. | GC 11.4 | Comment is noted. Reference to enhancement was included in the PEIR to show that it is being considered as the design of the project progressed. Enhancement opportunities such as biodiversity gains are presented in the Enhancement Strategy (Document 7.13) – a draft of which was provided to Gwynedd Council prior to submission of the DCO for comment – and discussed as appropriate during preparation of relevant documents associated with the DCO. |
| | The Council seeks confirmation that National Grid has ensured a consistent overall assessment on the levels of effects upon the various receptors at a project level, considering the route is divided into sections. A Section by Section approach to assessment has the potential to overlook fundamental, project-wide effects. This has not been discussed in the cumulative impacts section and should be clearly presented in the ES. | GC 11.5 | The approach to the assessment is being consistent at a project level across all disciplines. The section by section approach in the PEIR was intended to help stakeholders identify where the scheme may be relevant to them. Such an approach has been shown to be useful on previous schemes. The assessment in the ES has been written to show both local and overall project-wide effects, without splitting it into sections. |

| Table 2: Gwynedd Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>The Council questions some of the preliminary conclusions drawn, due to lack of baseline data to support the assumptions and conclusions presented. National Grid should avoid open statements at this point, which could be ambiguous and misleading for the purposes of consultation and consult the Council on the outcomes of the full EIA prior to DCO submission. There is a lack of supporting evidence for statements such as:</p> <ul style="list-style-type: none"> - Table 8.19 in relation to the potential magnitude of effect on otters; - Table 8.19 in relation to the temporary and partial loss of reptile habitat; - Table 8.24 in relation to the loss of ancient woodland adjacent to Pentir substation; - Table 8.26 which states that noise and vibration levels from the tunnel boring machine will not exceed acceptable levels for the overlying waterbody; and - Table 8.27 which states that significant effects on marshy grassland are considered unlikely. | GC 11.6 | <p>The PEIR was a preliminary assessment based on the information available at the time. Further surveys and a more comprehensive desk study have now been conducted and provided within the ES. The impacts that have been identified, together with an evaluation of their effects have been summarised within Chapter 9, Ecology and Nature Conservation (Document 5.9) of the ES, with further details of the results on which these were based provided in the Appendices of survey reports Appendices 9.3 to 9.17 (Documents 5.9.2.3 to 5.9.2.17). Noise propagation (from tunnel construction) into the waters of the Menai Strait, for instance, has been modelled and is presented in Appendix 9.18 Underwater Construction Noise Modelling Report (Document 5.9.2.18). This has been used as a basis for the assessment of the impacts of tunnelling on marine receptors.</p> <p>National Grid ensured that the PEIR contained sufficient information to enable both technical and non-technical consultees to develop an informed view of the likely significant environmental effects of the proposed development and to provide detailed comments on the design and mitigation proposed, as appropriate for that stage and in line with applicable statute, guidance and advice notes.</p> <p>Other information presented by National Grid for the statutory Stage Three Consultation included detailed plans of the Project and technical reports detailing the work undertaken to develop the proposed connection.</p> |
| | <p>The Council notes that the Proposed Mitigation and Residual Effects section is very brief and is limited to industry standard good practice measures at this stage. The Council expects a detailed analysis of the mitigation measures in the ES.</p> | GC 11.7 | <p>The PEIR was a preliminary assessment based on the information available at the time. Further surveys and a more comprehensive desk study have now been conducted and provided within the ES. The impacts that have been identified, together with mitigation measures have been addressed within Chapter 9, Ecology and Nature Conservation</p> |

| Table 2: Gwynedd Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | (Document 5.9) of the ES, with further details of the results on which these were based provided in the Appendices of survey reports Appendices 9.3 to 9.17 (Documents 5.9.2.3 to 5.9.2.17). |
| | The PEIR indicates that proposed mitigation measures will be presented on a receptor by receptor basis. In doing so, the assessment could overlook location-specific measures essential to mitigate effects on a combination of receptors. National Grid has not specified location-specific measures within the PEIR (with the exception of the generic measures proposed for the tunnel). Without further information, the Council cannot provide any conclusions on the residual effects for local communities in Gwynedd at this stage. | GC 11.8 | Receptors are grouped where necessary to understand location specific issues. The Amenity Assessment in Chapter 17 Socio Economics (Document 5.17) assesses potential effects on communities within the Study Area. A total of 50 community settlements were considered in relation to potential amenity effects. |
| | The Council notes that from an ecological perspective, the effects termed “ <i>intra-project cumulative effects</i> ” are simply project level effects, and expects that where interdependencies exist between topics, these are assessed in a defined place within the ES and cross-referenced appropriately to ensure a robust consideration of impacts. | GC 11.9 | The potential sources of effects on ecological receptors identified in other technical chapters have all been identified and have been taken into account in the assessment presented in ES Chapter 9 Ecology and Nature Conservation (Document 5.9) |
| | Paragraph 7.3.4 states that ‘no inter project cumulative effects have been identified for marine ecology receptors’. This is of concern to the Council who note that effects are likely, for example acoustic impacts on fish and marine mammals in the Menai Strait. | GC 11.10 | Noted. Inter project cumulative effects on marine ecology (e.g. from Wylfa Newydd Power Station and Third Menai Crossing) have been assessed in the ES Chapter 9, Ecology and Nature Conservation (Document 5.9), section 10.3. |
| | The Council notes, as was raised at Scoping, with the recent formal commencement of the development stage of the A55 third Menai Crossing, National Grid should describe how this project would be addressed in the inter-project cumulative assessment. | GC 11.11 | Noted. Inter project cumulative effects related to the Third Menai Crossing have been assessed in the ES Chapter 9, Ecology and Nature Conservation (Document 5.9), section 10.3 and for all topics in Chapter 20 Inter-Project Cumulative Effects (Document 5.20). |
| | The Council notes that there is no mention in the ecology chapter of what will happen to the spoil generated from tunnelling. It is critical that the ecological impact of this is assessed in the ES, especially where the reuse of material will occur, such as habitat / landscape creation. | GC 11.12 | Matters related to the management of materials arisings are set out in the Outline Material Management Plan (OMMP) (Document 7.12). Tunnel arisings are not proposed to be used on site. |

| Table 2: Gwynedd Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| 9 Historic Environment | | | |
| | This section refers to Chapter 9 of the PEIR – Historic Environment. | GC 12.1 | This comment is noted. |
| | The Council considers that the study area and extended study area are appropriate to the assessment of potential historic environment impacts of the project as it is currently described. The characterisation of baseline conditions presented in the PEIR also appears to be sound, although will need to be supplemented by the results of further field surveys, including geophysical surveys and trial trenching. This is necessary in particular for sites which have been newly identified by site walkovers, aerial photography and Lidar analysis. | GC 12.2 | Noted and agreed. |
| | Whilst the Council appreciates there are a number of figures provided as an appendix, these are not appropriately scaled, and no asset numbers are provided which limits the extent to which there is useful visual data presented to support the assessment. A larger number of figures, at a more appropriate scale would enable identification of individual assets. It would be beneficial for each asset to be labelled with reference numbers. | GC 12.3 | All figures have been produced at a scale of 1:12500, with all features labelled (Documents 5.10.1.1-5.10.1.9) |
| | Furthermore, aerial photography of the features has not been provided on the figures which means that the Council is unable to understand where the features are located in relation to the scheme. | GC 12.4 | These will be added to figures provided in Annex E of Document 5.10.2.1 |
| | The Council considers it necessary that, when discussing the location of assets, the distance from the project is provided, in order to enable the reader to understand where the asset is in relation to the project. Whilst this information is presented in the Scoping Settings Assessment, it would be beneficial for the distances to be stated in the Historic Environment chapter of the ES. | GC 12.5 | It may not always be necessary to include these specific references to distance from elements of the project within the baseline section, but within the ES, this has been made clear in the assessment section. |
| | The Council considers that the assessment methods and guidance proposed for the assessment are appropriate. The preliminary effects which have been identified to date appear to be logical and are generally well explained. The Council expects that more detailed consideration will be provided as further surveys are undertaken and the design is frozen. | GC 12.6 | Noted and agreed. |
| | Paragraph 5.4.31 states in respect of Carreg Leidr (SAM AN067) “while the views to the monument are to the east and south, views from the monument are to the east and south”. The Council requests a revision to this statement as it is unclear what National Grid is attempting to suggest. | GC 12.7 | Noted. For the same reasons given in the response, the conclusion in the PEIR was that this asset is unlikely to be significantly affected. A detailed assessment has been included in the ES Chapter 10 |

| Table 2: Gwynedd Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | Historic Environment (Document 5.20) in light of the final design freeze. |
| | The Council notes that, in relation to Conservation Areas in Table 9.2, a local designation and Medium value might be considered generally appropriate, but that this may be High value under some specific circumstances. The value assigned in this assessment therefore should be reviewed. | GC 12.8 | Noted and agreed. |
| | The Council expresses concern in relation to the potential for effects on the setting of Scheduled Ancient Monuments at Fodol Ganol Enclosed Hut Group (CN175) and Coed Nant-Y-Garth, standing stone (CN375) and potentially on the setting of the Vaynol Grade I Registered Park and Gardens. The Council considers that, where these impacts cannot be ameliorated by design, appropriate mitigation should be introduced to screen the impacts. This must be consulted upon in advance. | GC 12.9 | This has been subject to detailed assessment, which is set out in the ES Chapter 10 Historic Environment (Document 5.10). This includes wirelines from scheduled monuments CN175 and CN375 (Appendix 10.8 (Document 5.10.2.8)), |
| | The Council notes the high potential for buried archaeological remains and expresses that geophysical surveys and trial trenching should be undertaken, as a priority, in order to understand the impacts. | GC 12.10 | Geophysical Survey has been completed over a survey area agreed with GAPS. Proposals for subsequent Trial Trenching have also been discussed with GAPS. The approach to archaeological survey and mitigation is presented in the Archaeological Strategy (Document 7.8). |
| | The proposed mitigation and residual effects identified appear to be logical at this stage. The Council expects more detailed consideration and to be consulted on the emerging outcomes of the EIA as the baseline is developed and significant effects are identified with confidence. | GC 12.11 | The approach to archaeological survey and mitigation is presented in the Archaeological Strategy (Document 7.8) and the assessment findings are provided in ES Chapter 10 Historic Environment (Document 5.20). |
| 10 Geology, Hydrology and Ground Conditions | | | |
| | This section refers to Chapter 10 of the PEIR – Geology, Hydrology and Ground Conditions. | GC 13.1 | This comment is noted. |
| | The Council notes that National Grid should be aware of the implications of the Environmental Damage Regulations 2009 (as amended) for any spills, and should provide reference to this in the EIA. | GC 13.2 | Noted and agreed. |

| Table 2: Gwynedd Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | It would be useful to list and provide details of the surface water features in Appendix 10 so as to feed into any assessment of land quality. | GC 13.3 | Details of the main surface water features within the study area are provided in section of Chapter 11, Geology, Hydrology and Ground Conditions (Document 5.11), and further details are provided in Chapter 12, Water Quality, Resources And Flood Risk (Document 5.12). |
| | The Council requests further information to provide clarity on the baseline within Gwynedd. This includes information on private water supplies, public wells, coal mining, historic surface ground workings and historic potentially contaminated land uses, wastes and previous ground investigations. | GC 13.4 | Baseline information is presented within Section 7 baseline of Chapter 11, Geology, Hydrology and Ground Conditions (Document 5.11). This includes information on private water supplies, public wells, coal mining, historic surface ground workings and historic potentially contaminated land uses, wastes and previous ground investigations. |
| | The Council would like National Grid to confirm that they will review the BGS 1:10,000 geological mapping, available borehole logs available on-line on the BGS Geo-index, mining records from Coal Authority abandonment plans etc., in relation to Baseline Data gathering, and undertake a detailed site walkover following a review of the desk study data to assess the context of the information presented and to detail any other findings which may not be apparent from desk study. While Section 3.3.1 includes a range of data sources it is not specific in highlighting the sub-sets of data within the broad source areas. | GC 13.5 | Baseline geological information is presented within Section 7 of Chapter 11, Geology, Hydrology and Ground Conditions (Document 5.11). Information has been gathered from reviewing the geological mapping available on the BGS Geo-index interactive mapping service which is presented as Figures 11.1 and 11.2 (Document 5.11.1.1 and Document 5.11.1.2). A Non-residential Coal Mining Report has been procured and reviewed and is included as Appendix 11.4 (Document 5.11.2.4). No mine abandonment plans are available for the area of coal mining identified. A detailed, targeted walkover of sites of direct interest to the Proposed Development has been undertaken, the findings of which are available within Section 7 of Chapter 11, Geology, Hydrology and Ground Conditions (Document 5.11), (where data sources are stated within each sub-topic) and Appendix 11.5 (Document 5.11.2.5). |
| | The Council notes that detailed description of geological units and materials have not been included in the chapter. In addition there is no mention of information sources from which unit thicknesses may have been derived (such as from BGS borehole data if available). It | GC 13.6 | Descriptions of geological units have been included in this chapter and are presented within section 7 baseline conditions of Chapter 11, Geology, Hydrology and Ground Conditions (Document 5.11). |

| Table 2: Gwynedd Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | would be beneficial for the Council to have sight of these to promote transparency of assessment. | | These have mainly been taken directly from the BGS Lexicon of Named Rock Units. |
| | Section 5.3.23 is related to the construction and decommissioning of the tunnel but does not refer to the excavation material arising from the tunnel, and the material required for backfill. The Council expresses concern over the lack of information on the approach for handling and disposing of the large amount of spoil likely to be generated from the construction of the tunnel. It is likely that the volume of material will dictate transport and disposal options and it is unclear whether this will be dealt with on Anglesey or the mainland. Furthermore, the temporary storage of any material (arising or for filling) will need to be considered carefully so as to prevent impacts on the existing soils and groundwater. | GC 13.7 | <p>The storage of stripped topsoil and excavated subsoil will be in accordance with good practice, as described in the ES Chapter 18 Agriculture (Document 5.18), the CEMP (Document 7.4) and the OSMP (Document 7.10). This will effectively mitigate adverse impacts to soils and groundwater.</p> <p>The majority of tunnel spoil will not be utilised for the construction works and will be taken off site for use elsewhere. Suitable facilities and sites have been identified on Anglesey and in North Wales for the recovery, recycling and disposal of tunnel spoil. More information is provided in the (Document 7.12)</p> <p>Generation of arisings and materials management are discussed within Chapter 4 Construction, Operation, Maintenance and Decommissioning of the Proposed Development (Document 5.4).</p> |
| | The Council suggests that in terms of assessment methodology a quantitative assessment is incorporated into defining the magnitude of impact in order to reduce the degree of subjectivity which may be applied. | GC 13.8 | Quantitative assessment has been undertaken where feasible to do so; however the effects and required mitigation measures presented are considered to be robust and sufficient for the purposes of EIA |
| | Whilst it has not been expressed in the PEIR chapter, the Council assumes that the reporting and assessment of potential ground contamination (in addition to mitigation) shall be in accordance with the Environment Agency's Guiding Principles for Land Contamination (GPLC1, GPLC2 and GPLC3). | GC 13.9 | The assessment and reporting of potential ground contamination is in accordance with the Environment Agency's 'Guiding Principles for Land Contamination' for the relevant level of assessment undertaken. The methodology with regards to baseline information gathering, reporting and assessment of potential ground contamination is discussed within section 4 methodology of Chapter 11, Geology, Hydrology and Ground Conditions (Document 5.11). |
| | The Council considers that the potential effects with regards to the ground contamination requires further detail. Changes in patterns and rates of infiltration and runoff arising from ground disturbance and development of a below ground earth grid, substation support | GC 13.10 | The assessment of ground contamination is presented within section 8 potential effects and section 9 mitigation and residual effects in Chapter |

| Table 2: Gwynedd Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | structures and working areas is assessed as being Very Low, however this is likely to vary significantly. | | 11, Geology, Hydrology and Ground Conditions (Document 5.11). The assessment is based on information provided in section 7 baseline conditions, in Chapter 11, Geology, Hydrology and Ground Conditions (Document 5.11), which also includes the 2016 and 2017 intrusive ground investigation information. |
| | Proposed mitigation options in relation to ground contamination and dewatering require further development. A robust assessment will be required by inputting baseline information, including intrusive investigations, etc. | GC 13.11 | Chapter 11, Geology, Hydrogeology and Ground Conditions (Document 5.11) has been updated to reflect the Proposed Development as applied for. |
| | The assessment presented concludes that with the good site practice mitigation measures outlined in the Construction and Environmental Management Plan (CEMP) (Appendix 4.1) in place, the effects on uncontaminated strata and construction worker health would be negligible (not significant) as spillages will be unlikely and if they did occur they would be managed so not posing a risk to human health and localised effects on soils and geology repairable. However, the effect on groundwater would be considered to be Minor Adverse (not significant) due to a low magnitude of effect but the presence of groundwater receptors of high importance within some areas of the Proposed Project Boundary. It is the very low risk of a leak or spillage that limits the significance, although it is recognised that the risk is not zero. This appears appropriate, and is expected will be supported by further information within the ES. | GC 13.12 | Noted. |
| | The Council considers it essential that the interrelation of topic areas, such as water quality, material resources and ecology, is considered. This requires further assessment as part of the EIA and should be consulted on prior to DCO submission to ensure that suitable collaborative mitigation measures are developed. | GC 13.13 | ES Chapter 19 Intra-Project Effects (Document 5.19) provides an assessment of potential effects on receptors from multiple topic areas. This chapter was issued as part of Batch 4 for feedback and comments. |
| | Within the PEIR V2 - 10: Geology, Hydrogeology and Ground Conditions (Assessment Guidance and Methods / Baseline Conditions) BGS maps, surveys have been used to gather data as part of the chapter. Within Baseline Conditions and Summary of Geology table for each Section. Bedrock Geology is described and is also plotted on maps figure 10.1. It is recommended that the geology is categorised in accordance with that of BGS Safeguarding Map of Wales. Categorising the geology as Cat1, Cat2 aggregate safeguarding areas, will identify the geology and that sterilisation of reserve may consequently take place along the route. The sterilisation or temporary sterilisation of reserve should be justified within the greater proposal. | GC 13.14 | Mineral Protection Areas, including their categories, as identified in the BGS Safeguarding Map of Wales, have been reported within the Order Limits and are discussed in the Planning Statement (Document 7.14). |

| Table 2: Gwynedd Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | Within the PEIR V2 - 10: Geology, Hydrogeology and Ground Conditions (Preliminary Appraisal of Potential Effects – Tunnel). The Bedrock has been established from secondary BGS mapping data - schist, mica and limestone. Notwithstanding, it is recommended that primary exploration is undertaken. 5.3.15 states that the rock spoil from the tunnelling work will be unlikely deposited in landfill / waste disposal sites but likely to be transferred to an existing quarry on Anglesey / North Wales for reuse. What category mineral is this specified as within BGS maps? | GC 13.15 | An intrusive survey of the onshore section of the proposed tunnel alignment Work Plan DC/DE/PS07 (Document 4.4) has been undertaken. A summary of the results along with Mineral Protection Areas and classification of minerals by the BGS is discussed under section 7 baseline conditions. The CEMP (Document 7.4) and OMMP (Document 7.12) have been submitted with the application for a DCO. An OWMP (Document 7.11) has also been submitted with the application for a DCO, which details the types and volumes of tunnel arisings and reuse/ disposal options. |
| 11 Water Quality, Resources and Flood Risk | | | |
| | This section refers to Chapter 11 of the PEIR – Water Quality, Resources and Flood Risk. | GC 14.1 | This comment is noted. |
| | Paragraph 3.3.7 notes that “ <i>water resources receptors are defined within this assessment as surface water abstractions and their associated upstream catchment</i> ” yet the Council note that groundwater abstractions and private water supplies should be included in this definition. | GC 14.2 | The effects associated with groundwater abstractions are addressed in ES Chapter 11 Geology, Hydrogeology and Ground Conditions (Document 5.11). |
| | The Council would like to see evidence in the form of Figures to inform the decision making of the statements contained in Sections 5.4.14, 5.4.15, 5.4.17 (in relation to assessment of effects on water resources) 5.2.7 and 5.2.8 (in relation to assessment of effects on aquatic environment). This will benefit in informing the assessment and ensuring a transparent and robust decision making process. | GC 14.3 | Figure 12.3 (Document 5.12.1.3) has been provided to provide detailed evidence in support of the statements made in the assessment of effects. |
| | The Council seeks further evidence to support some of the conclusions drawn, and considers that mitigation options are seemingly being discounted within the document at an early stage without adequate justification. The Council would, in particular, expect to see evidence to support the assessment of the magnitude of effects reported in Sections 5.2 to 5.6. As a minimum this should be provided through Water Framework Directive (WFD) and Flood Consequence Assessments (FCA). It seems premature to assess the potential effect without these assessments completed as a minimum. | GC 14.4 | Further detail has been provided in Section 9 of Chapter 12, Water Quality, Resources And Flood Risk (Document 5.12) within the assessment of residual effects. This has included an assessment of site specific infrastructure including proposed tracks, pylons and crossings and their hydrological connectivity to individual surface water receptors. This approach has also been adopted in the FCA and WFD Appendices 12.1-4 (Document 5.12.2.1-4) and |

| Table 2: Gwynedd Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | 12.5 (Document 5.12.2.5) respectively. The CEMP (Document 7.4) provides mitigation measures, which would be secured through DCO Requirement 6. |
| | The Council considers that further information is required in order to inform the assessment. For example, Table 20 notes that the changes in patterns and rates of infiltration and runoff arising from ground disturbance and development of access tracks and working areas is assessed as being 'very low', however this will greatly vary in relation to the extent of the access track and working areas involved. Mitigation options have been seemingly discounted within the document at an early stage, without the provision of evidence to support the conclusions drawn. | GC 14.5 | See response to GC 14.4 |
| | Table 18 lists the proposed mitigation by design (DMM) and the mitigation by construction (CMM) measures. The Council notes that the DMM measures due to changes to watercourse morphology as a result of works in or near watercourses (e.g. installation of watercourse crossings) should also include potential mitigation required, including compensatory measures, due to the loss of WFD habitat through, for example, the introduction of culvert crossings. The Council also notes that the DMM measures due to volumetric displacement of flood water associated with the construction of temporary spoil mounds also need to include potential mitigation required, including compensatory measures, due to any loss of floodplain. This is applicable to all elements of the project including the overhead line, temporary works, third party works (e.g. rationalisation of existing distribution network), THH/SECs and substations. | GC 14.6 | Mitigation by design presented in Section 9.1 of ES Chapter 12, Water Quality, Resources And Flood Risk (Document 5.12) has reduced the number of watercourse crossings and avoided the loss of WFD habitat. Further mitigation is also included in Table 12.20 and the CEMP (Document 7.4) which is secured through DCO Requirement 6. Measure FM12 specifically would help manage effects from watercourse crossings to an acceptable level, as reported in the WFD Assessment in Appendix 5 (Document 5.12.2.5). FM12 includes a requirement for all crossing structures to be covered by FRAP and OWC as appropriate, to comply with the WFD. |
| | The Council requests that Section 5.2 – 5.6 will have to be reviewed and updated in view of the issues and recommendations previously identified. This will avoid scoping out potentially significant effects and to ensure transparent and robust decision making. | GC 14.7 | This has been done, including as per the responses listed above. |
| | The Council would expect to see evidence to support the assessment of the magnitude of effects reported in Sections 5.2 to 5.6. As a minimum this should be provided through WFD assessment and FCA. It seems premature to assess the potential effect without these assessment completed as a minimum. | GC 14.8 | See response to GC 14.4. |
| 12 Traffic and Transport | | | |
| | This section refers to Chapter 12 of the PEIR – Traffic and Transport. | GC 15.1 | This comment is noted. |

| Table 2: Gwynedd Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | The Council welcomes the discussions National Grid are proposing with relevant Highways Authorities to fully develop to the scope of the Traffic Assessment (TA). The TA will make clear reference to where the scope of assessment has been agreed between the applicant and the Councils and note, with justification provided, any departure from current guidance (Table 12.1). The Council support the approach stated at the site visit between National Grid and the Councils on 14/10/2016 at which it was stated that the extents of the traffic and transportation ES chapter, Transport Assessment and Travel Plan will be scoped and submitted to the Councils by the end of 2016. Further engagement is considered important to develop the parameters for the TA. | GC 15.2 | <p>This comment is noted.</p> <p>Likely significant traffic and transport effects of the Project have been assessed. Detail is set out in the traffic and transport chapter of the ES (Document 5.13) and the Transport Assessment (Document 5.13.2.1).</p> <p>The scope of the Transport Assessment has been agreed with Welsh Government, IACC and Gwynedd Council, including the extent of the trunk road network that has been assessed. This covers the A55, A487 and A5 and Britannia Bridge.</p> |
| | At this stage no amendments are proposed to the previously identified Zol, however, this will be reviewed, along with the extent of the study area, at the ES stage (Table 12.1). It is recommended, that the Zol, remains under review until the rationale behind the study area is agreed with the Council. | GC 15.3 | The ES Chapter 13 Traffic and Transport (Document 5.13) and associated Appendix 17.1 Transport Assessment (Document 5.13.2.1) clearly identify the Study Area for the Proposed Development, which has been refined following consultation with the authorities and further information on the construction activity associated with the Proposed Development being made available. It is explained in these documents why the Zol is no longer applicable. |
| | Table 12.20 reports the increase in traffic using the TEMPRO model. The Council seeks clarity on the dataset that has been used, and recommends using the National Traffic Model Traffic Growth Calculation derive traffic growth forecasts. | GC 15.4 | Explanation as to how future baseline traffic using TEMPRO has been provided in ES Chapter 13 Traffic and Transport (Document 5.13) and associated Appendix 17.1 Transport Assessment (Document 5.13.2.1) |
| | The Council seeks consultation on the assumption set out in Paragraph 5.4.13 that <i>"construction activity will take place during a 12 hour working day and 6-day working week between Monday and Saturday"</i> . Further engagement will ensure that a robust basis is provided for the EIA. As set out in Section 3 of this report further rationale is required to justify the proposed construction working hours. | GC 15.5 | ES Chapter 13 Traffic and Transport (Document 5.13) and associated Appendix 17.1 Transport Assessment (Document 5.13.2.1) and the OCTMP (Document 7.5) set out the proposed working hours for construction activity. This is consistent with information provided in the CEMP (Document 7.4). Additional physical and non-physical mitigation measures are also included in the OCTMP. |

| Table 2: Gwynedd Council | | | |
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| | | | Construction working hours are set out in DCO Requirement 8 (Document 2.1), which was discussed with both IACC and Gwynedd Council. |
| | The Council welcomes the commitment made by National Grid in paragraph 2.1.5, which states that where possible, sensitive receptors and links deemed unable to facilitate a high number of HGV movements will be avoided completely, and where unavoidable will be subject to additional mitigation. | GC 15.6 | This comment is noted. |
| | The Council seeks further information on how the traffic flows for HGVs, as listed in Table 12.23 and associated with the overhead lines, have been disaggregated. Whilst traffic figures have been calculated through consultation with engineering consultants, the Council finds that the figures presented provide a breakdown of the anticipated LV traffic for each element of Tunnel, Head House and SEC construction in isolation. This will provide assurance for the Council that the level of traffic has been correctly calculated. | GC 15.7 | ES Chapter 13 Traffic and Transport (Document 5.13) and associated Appendix 17.1 Transport Assessment (Document 5.13.2.1) detail the construction traffic anticipated for individual elements of the Proposed Development as well as the construction traffic for the Proposed Development in totality. |
| | The Council requests further consultation with National Grid in order to refine the construction routeing. Modifications to vehicle routes were suggested by the Council at the site visit with National Grid on 14/10/2016. At this stage it is reasonable to assume that some significant delay will occur as a result of the increased traffic through junctions along construction routes and as a result of any temporary mitigation measures such as traffic management and other measures outlined in the Outline Construction Traffic Management Plan. This will be assessed in detail within the TA which will accompany the ES chapter. | GC 15.8 | Construction traffic routes have been proposed based on consultation with the local highway authority and key technical stakeholders. ES Chapter 13 Traffic and Transport (Document 5.13) and associated Appendix 17.1 Transport Assessment (Document 5.13.2.1) detail the volume of construction traffic anticipated for the Proposed Development and assess the capacity and delay on key junctions along the proposed construction routes. |
| | Paragraph 5.5.19 states that <i>'It would be expected that any permanent access roads would be removed as part of the final stages of the decommissioning phase'</i> . The Council requests further information to inform the assessment of how the decommissioning phase will be undertaken, for example whether highways / off highway areas will be returned to their previous state. During the site visit with National Grid on 14/10/16, it was confirmed that areas impacted by the construction phase will be returned to its original form. The Councils recommend continued engagement on this. | GC 15.9 | Restoration proposals are reported in Chapter 4 Construction, Operation, Maintenance and Decommissioning of the Proposed Development (Document 5.4). The OSMF (Document 7.10), which forms part of the CEMP (Document 7.4), sets out the general methods for handling, excavation, storage and reinstatement of soils and peat. The CEMP also contains the following reinstatement commitment: <i>'To facilitate the reinstatement of land, soil and watercourses, pre-condition surveys will be discussed with landowners and where agreed, carried</i> |

| Table 2: Gwynedd Council | | | |
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| | | | <i>out of land within working areas. This will include a photographic record, written description and topographical survey, which will be used to ensure a complete and accurate reinstatement of land'. As the pre-condition surveys would not be undertaken until after the DCO is in place, the results cannot be provided in the ES as requested.</i> |
| | The Council supports the approach taken by National Grid that the assessment should assume all spoil must be removed from site in order to provide a worst-case transport assessment. There is however at this stage no detail presented in the PEIR as to the volume of spoil arising and the associated volume of traffic movements, which is expected to be significant. The proposed routing of movements of spoil will be of key interest to Gwynedd. The Council must be consulted on this prior to DCO submission to understand local impacts and agree appropriate mitigation. | GC 15.10 | ES Chapter 13 Traffic and Transport (Document 5.13) and associated Appendix 17.1 Transport Assessment (Document 5.13.2.1) identifies the volume of spoil associated with the excavation of the tunnel, and the associated HGV movements. Gwynedd Council has been consulted throughout the pre-submission period. Further details on volumes of materials are detailed in the OWMP (Document 7.11) and OMMP (Document 7.12). |
| 13 Air Quality and Emissions | | | |
| | This section refers to Chapter 13 of the PEIR – Air Quality and Emissions. | GC 16.1 | This comment is noted. |
| | The reference to the DEFRA Emission Factor Toolkit in paragraph 1.1.7 is out of date, although it is referenced correctly (version 7.0) elsewhere in the chapter. | GC 16.2 | The assessment reported in ES Chapter 14 Air Quality and Emissions (Document 5.14) is informed by the current version of Defra's Emission Factor Toolkit (Version 7.0). |
| | The Council notes that, if designated sites are designated for lichen or moss, the more stringent SO ₂ objective should be included in Table 13.2 or clarified in the text. | GC 16.3 | Where lichens are present the SO ₂ objective is 10µg/m ³ , otherwise the objective value is 20 µg/m ³ , as set out in Table 14.1 of ES Chapter 14 Air Quality and Emissions (Document 5.14). |
| | The Council agrees that any opening year assessment of road traffic impacts should be undertaken holding emission factors and background data at baseline levels. | GC 16.4 | The assessment of road traffic emissions holds background pollutant concentrations and vehicle emissions rates at the 2013 base values provided by Defra, as set out in Section 4 of ES Chapter 14 Air |

| Table 2: Gwynedd Council | | | |
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| | | | Quality and Emissions (Document 5.14) and Appendix 14.3 (Document 5.14.2.3). |
| | The Secretary of State has noted the potential for other forms of transport to be used in addition to road. The response from National Grid clarifies the position on non-road mobile machinery, but does not confirm what other transport measures are proposed, such as by rail or sea. Further clarification is required in addition to ongoing consultation with the Council. | GC 16.5 | <p>No other forms of transport are anticipated or considered in the assessment reported in this chapter of the ES.</p> <p>The nature of overhead line construction can involve numerous concurrent work locations which construction workers, equipment and materials have to reach. It is therefore not feasible to use the railway to transport workers and/or goods for the overhead line.</p> <p>The potential to use the railway to transport spoil from the tunnel and to bring in concrete lining segments has also been considered. There are no existing sidings or rail loading facilities in close proximity to either tunnel head house sites or substation locations. The amount of material being generated from the tunnel or substation works would make the construction of such a siding or rail loading facility for this purpose unviable. Furthermore, the construction of a siding would require a significant amount of materials and therefore HGV movements in itself. In any case, the use of any other sidings in the region would not reduce the amount of HGV movements generated, as the tunnel spoil would need to be transported to these facilities by road and any materials would need to be transported from these facilities to the construction sites by road.</p> |
| | The Council notes that the construction dust assessment doesn't appear to have considered local designations of ecological receptors (which are shown in Figure 8.2 of the PEIR), with a focus on statutory designated sites only. The Council seeks justification for this omission. | GC 16.6 | The assessment described in ES Chapter 14 Air Quality and Emissions (Document 5.14) is consistent with the method described in IAQM (2014) guidance, which includes local sites in the consideration of potential effects. This approach is summarised in section 4 Methodology of ES Chapter 14 Air Quality |

| Table 2: Gwynedd Council | | | |
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| | | | and Emissions (Document 5.14) and Appendix 14.2 (Document 5.14.2.2). |
| | The Council suggests that each ecological receptor assessed should be separated and shown as a different colour or boundary on Figures and that construction compounds such be displayed on Figure 13.1. This would aid understanding for the reader. | GC 16.7 | Ecological receptors are displayed on Figure 14.3 Construction Dust Emissions Sensitive (Document 5.14.1.3). |
| | The Council considers that, where an assessment of the energy plant is required, sensitivity testing using at least three years of meteorological data should be undertaken to account for inter-annual variability. | GC 16.8 | The assessment reported in ES Chapter 14 Air Quality and Emissions (Document 5.14) considers the worst impact of emergency generators against five years of meteorological data (2012 to 2016). A sensitivity analysis of impacts with varying meteorological years is provided in Appendix 14.3 (Document 5.14.2.3). |
| | The Council notes that Sulphur Hexafluoride (SF6) has not been mentioned in the chapter, and requests clarification as to whether the extensions to the substation will require additional levels of SF6 to be used on site. The Council notes that as specific measures will be in place to minimise leakage, a full assessment is not required, but SF6 should at least be considered. | GC 16.9 | Sulphur Hexafluoride (SF6) is not considered in the assessment, which describes potential local air quality impacts, rather than greenhouse gas emissions. |
| | There is a lack of information regarding specific routes. HGV's should be routed along roads which will give rise to least noise and air pollution for nearby residents. We would recommend that National Grid liaise with the local highway authority and Environmental to consider possible mitigation and or improvements to location F of the scheme. | GC 16.10 | The construction traffic routes have been determined through consultation with IACC and Gwynedd Council and other technical stakeholders. ES Chapter 13 Traffic and Transport (Document 5.13) and associated Appendix 17.1 Transport Assessment (Document 5.13.2.1) detail the volume of construction traffic anticipated for the Proposed Development and assess the capacity and delay on key junctions along the proposed construction routes. |
| Sealing End Compound and Tunnel Head House – Pentir | The construction is likely to require mobile diesel plant generators and as is likely to require Environmental Permits for combustion plants between 1 - 50 MW. (The Medium Combustion Plant Directive) | GC 16.11 | The Welsh Government is currently consulting on how to implement The Medium Combustion Plant Directive in Wales. Chapter 14 of the ES (Document 5.14) considers the contribution of emissions from the emergency |

| Table 2: Gwynedd Council | | | |
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| | | | generators proposed, as described in Section 4 and Appendix 14.3 (Document 5.14.2.3). |
| (Doc 2.4.2) Measurement and Monitoring Data – Table 13.19 | This Table relating to existing data on Nitrogen Dioxide only considers a 3 month mean in 2011; however data has been collected by Gwynedd Council under LAQM in two locations within the vicinity of the proposed scheme. Data has is available form 2001 until December 2015 and has been bias adjusted. | GC 16.12 | The existing baseline data reported in section 7 of ES Chapter 14 Air Quality and Emissions (Document 5.14) is based on that made publically available in Local Air Quality Management reports and on the Welsh Air Quality website. |
| PM2.5 Air Quality | National Grid has quoted an annual mean objective of 25ug/m3 for PM2.5 and although this is the future target level for this particulate, there are stricter guidelines set by the WHO. In order to adequately consider the project in terms of impact on health, the lower WHO Annual Objective of 10ug/m3 should be used. (WHO, 2014b). (WHO, 2006a). | GC 16.13 | The basis of the assessment in ES Chapter 14 Air Quality and Emissions (Document 5.14) is to consider air quality impacts relative to the Welsh Air Quality Objectives, set out in Welsh Government legislation. This relationship is then used to determine the significance of effect. However, the assessment does also consider the impact of PM _{2.5} emissions to the stricter WHO guidelines, as set out in Section 2.5. |
| Monitoring/Mitigation Potential Table 13.24 | As there is a potential for dust generation at the tunnel head house and sealing compound areas at Pentir on route F, we would recommend the use of Particulate Monitors to monitor Pm 10 and Pm 2.5. Most monitors measure within the range of PM 1-10. | GC 16.14 | Details of particulate monitoring are set out in Section 3.5 of the CEMP (Document 7.4). |
| 14 Construction Noise | | | |
| | This section refers to Chapter 14 of the PEIR – Construction Noise. | GC 17.1 | This comment is noted. |
| PEIR Chapter 3 Section 3.13 Table 3.1 Temporary Work Areas | Temporary working areas are helpfully described. It does not appear that the location of all temporary working areas are defined on the Works Plans. Will this be provided in the ES? All temporary land take should be assessed as part of the EIA and be within the Order Limits of the DCO. The Council expresses concern over baseline noise measurements which cannot be defined for construction noise assessment without a definition of construction working areas. | GC 17.2 | All temporary land take is within the Order Limits and has been assessed within the Environmental Impact Assessment (EIA). The Temporary Working Areas are illustrated on Figure 4.1 (Document 5.4.1.1). Comprehensive baseline noise measurements have been carried out at representative locations within the study area as set out in Appendix 15.1 (Document 5.15.2.1). |

| Table 2: Gwynedd Council | | | |
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| PEIR Chapter 14 - para 4.3.23, Table 14.2 | Section 4.3.23 states that "it is therefore appropriate to determine sensitivity on a case by case basis at a local level", which the Council consider appropriate. However, Table 14.2 lists the sensitivities of types of receptor, without a note referring back to the text to indicate that there may be flexibility in the categorisation for non-residential receptors in the Table, on a case by case basis. It is not therefore clear whether sensitivity will be considered on a case by case basis or not. | GC 17.3 | Table 4.2 of the PEIR defined the sensitivities generally allocated to each receptor type. This has been updated and is provided in Table 15.7 of ES Chapter 15 Construction Noise (Document 5.15). This table has been used as a basis to determine the sensitivity of all receptors within the study area for this assessment. |
| PEIR Chapter 14 - Table 14.2 | The Council appreciate the revision of Table 14.2 to address comments made previously regarding the Scoping Report, to include education facilities as medium sensitivity, and the addition of places of worship. The table does not, however, present the sensitivity for patients in hospitals not considered "vulnerable subgroups". The Council would expect these to be included with residential receptors. | GC 17.4 | Patients in hospitals which are not of a vulnerable subgroup have been included in the Medium sensitivity group. Please refer to Table 15.7 in ES Chapter 15 Construction Noise (Document 5.15). |
| PEIR Chapter 14 - para 4.3.24 onwards | The Council do not consider the PEIR to clearly state how the likely significant effects will be identified. For example, it is not clear how the impact classifications will be used in combination with the sensitivity classifications in Table 14.2 and how all relevant factors will be considered. The methodology for identifying the likely significant effects in the ES will need to be transparent and easily navigable. In addition, the ES should identify how the proposed scheme will satisfy noise objectives promoted by the Welsh Government. | GC 17.5 | <p>The comments are noted with regards to how the impact classifications have been used in combination with the sensitivity classifications. The methodology follows that in Annex E3.3 of BS 5228-1:2009+A1:2014, i.e. Example method 2 - 5 decibel (dB) (A) change. None of the example methods in Annex E provide a full consideration of impact vs sensitivity. However in this ES, the sensitivity scale applied is such that a moderate significance of effect is aligned with a medium magnitude of effect at a receptor of medium sensitivity. This is in line with the method in BS 5228-1:2009+A1:2014, which only considers receptors that are identified as being of medium sensitivity, but extends to other receptors as considered in this assessment. Please refer to Section 4.5 assessment criteria in ES Chapter 15 Construction Noise (Document 5.15).</p> <p>The Welsh Government objectives are provided in Section 2.2 legislation. Section 9 mitigation and residual effects in ES Chapter 15 Construction Noise (Document 5.15) provides details of mitigation that has been employed to achieve these objectives.</p> |

| Table 2: Gwynedd Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| PEIR Chapter 14 - Table 14.3 | Table 14.3 is titled "Construction noise levels lower cut-off values which might result in various probabilities of adverse impact". It sets out "threshold values" with a subtitle "Lower cut-off value". As such the Council would expect these to be a single number, as was highlighted previously in response to the Scoping Report. The text following the table suggests that the table has a dual function, providing both cut-off /threshold values, and ranges for impact severity. This is confusing for the reader. The Council suggests that the cut-offs should be set out separately from the ranges of levels which are deemed to represent different levels of impact severity. A clearer way to present the information would be to provide a separate table for each assessment period. The ranges within which the ambient plus construction noise would fall for different probabilities of adverse impact could then be set out in one row, and the minimum threshold value for that period provided in the same table, clearly identified as the cut-off. | GC 17.6 | The revised ES Chapter 15 Construction Noise (Document 5.15) has sought to improve upon the presentation and use of this table. Criteria for short-term and long term works have been separated to provide clarity. Please refer to Section 4.5 assessment criteria. |
| PEIR Chapter 14 – para 4.3.27 to 4.3.28 | The examples set out in Section 4.3.27 and 4.3.28 are appreciated as they provide good illustration on how the criteria are intended to be applied. | GC 17.7 | The examples have been retained in Section 4.5 assessment criteria in ES Chapter 15 Construction Noise (Document 5.15). |
| PEIR Chapter 14 – para 4.3.29 | Paragraph 4.3.29 refers to both lower cut-off values and criteria. The Council requests clarification as to whether this means that the lower cut-off values are the criteria. If this is the case it is not clear what the ranges mean. Separating the tables, as suggested above, would provide greater clarity. | GC 17.8 | The wording originates from the Standard (BS 5228-1:2009+A1:2014) as does the method which has been applied. The text has been altered within this ES chapter to be clearer. Please refer to Section 4.5 assessment criteria in ES Chapter 15 Construction Noise (Document 5.15). |
| PEIR Chapter 14 – para 4.3.30 to 4.3.31 | Due to the lack of clarity resulting from having ranges which appear to represent thresholds, paragraphs 4.3.30 and 4.3.31 are hard to interpret. For example, what "5dB below and equal to" a range means. | GC 17.9 | The explanation of the methodology has been updated in the final version of ES Chapter 15 Construction Noise (Document 5.15). |
| PEIR Chapter 14 – para 4.3.31 | Paragraph 4.3.31 states that "a night time free-field noise limit of 45 dB LAeq, 12 hr. (adjusted to façade level from free-field to be consistent with the levels in Table 14.3)". It is not clear whether the 45 really is free field or façade as it is stated to be a free field level and then referred to as being adjusted to a facade level from free field level. The source of the criteria is quoted as MTAN but the levels are not provided, so the reader is left to de-cypher this. Clarification of this would be helpful. The Council assumes that as MTAN talks about a level of 42dB (A) free-field at night, that the 45dB (A) referred to in the PEIR is at facade level. | GC 17.10 | The methodology presented in Section 4.5 assessment criteria in ES Chapter 15 Construction Noise (Document 5.15) has been updated to address this comment. |

| Table 2: Gwynedd Council | | | |
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| PEIR Chapter 14 – para 4.3.31 | Further, it is noted that MTAN sets out daytime noise limits which are relative to background, with 55dB (A) as the maximum daytime level, and 42dB (A) for night-time (all assumed to be free-field). The lower limits which could apply where ambient noise levels are low have been ignored in deriving the criteria for work sites with long durations. The Council believe the criteria may be too high if the background noise levels are low. Further engagement is required on this matter. | GC 17.11 | Quarries are usually worked for many years, far longer than the construction programme for the Proposed Development, and hence the relationship with the background becomes more important. Use of these criteria for longer term works is suggested, recognising that lower criteria than conventional construction noise criteria should be applied for longer term construction activity in rural environments. |
| PEIR Chapter 14 – Footnote 16/4.3.32 | Footnote 16: Year of reference not consistent for DMRB - should be 2011. | | This is now updated and the November 2011 version of Design Manual for Roads and Bridges (DMRB) is referred to within ES chapter 15 Construction Noise (Document 5.15). |
| PEIR Chapter 14 – Table 14.4, para 4.3.33 | The Council agrees with the magnitude of impact assigned to the noise change for road traffic, set out in Table 14.5 and paragraph 4.3.33. The level at which the impact might be deemed to result in a significant effect however, and the circumstances which might influence that, are not described. Assessment of significance cannot be made without defined criteria for significance. This is required. | GC 17.12 | The significance of effects has been applied such that a medium magnitude of effect at a medium sensitivity receptor would result in a moderate effect. This is provided in Section 4.5 assessment criteria in ES Chapter 15 Construction Noise (Document 5.15). |
| PEIR Chapter 14 – para 4.3.35 to 4.3.36, Table 14.6 | The Council agrees with the threshold vibration values for onset of cosmetic building damage, set out in Table 14.5 and paragraphs 4.3.35 to 4.3.36. The vibration levels should be cited as peak component particle velocity for clarity. It is not explicitly stated the level at which the vibration is deemed to result in a significant effect. The Council assumes that any exceedance of the criteria set out would constitute a significant effect, but it would be useful for the text to state this clearly. Assessment of significance cannot be made without defined criteria for significance. | GC 17.13 | Confirmed component peak particle velocity (PPV). A significant effect occurs at above these levels. See comment above in relation to Table 14.5, 4.3.34 for further clarification in ES Chapter 15 Construction Noise (Document 5.15). Criteria identifying magnitude of effect for building damage are provided in Table 15.13 in Section 4.5 assessment criteria with further clarification in Paragraph 5.5.1 in ES Chapter 15 Construction Noise (Document 5.15). |
| PEIR Chapter 14 – para 5.1.1 - 5.7.11 | In Section 5, the Council appreciates the comprehensive description of the existing areas and identification of the number of residential receptors within the study area for the individual construction sites. It is noted that no non-noise sensitive receptors have been identified other than the PRoW. Further, it is noted that the number/concentration of noise sensitive receptors close to access roads to the sites has not been highlighted. This should be included. There is in general a good coverage of baseline residential receptors close to | GC 17.14 | Comprehensive baseline monitoring has been undertaken based upon noise sensitive receptors (NSRs) likely to be most affected by the construction works or operational infrastructure. The distribution of the measurement locations is appropriately balanced based upon those receptors potentially most affected. Levels at other receptors have been |

| Table 2: Gwynedd Council | | | |
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| | worksites, but a question remains as to whether receptors which are situated close to roads have been omitted. | | <p>extrapolated/interpolated as per best/standard practice where it is impracticable to monitor at all locations potentially affected.</p> <p>Non-residential sensitive receptors have been considered within ES Chapter 15 Construction Noise (Document 5.15).</p> <p>For receptors along traffic routes, it has not been considered necessary to carry out baseline monitoring as the assessment approach utilises baseline traffic data to evaluate the baseline conditions.</p> |
| PEIR Chapter 14 – para 6.2.5 | Paragraph 6.2.5 states that access roads "will not require the use of machinery or construction activities that are likely to result in high levels of vibration". However, one of the three items of plant identified as likely to be working on access roads is a roller. Vibratory rollers can give rise to significant levels of vibration. The Council therefore considers that the assessment may underestimate the impacts in the event that a vibratory roller was used. Potential to underestimate impacts due to vibratory rollers. Further engagement on this is required. | GC 17.15 | There is potential for vibratory rollers to be used in the construction of access tracks, so vibration effects on receptors have been considered; please refer to Section 9.5 installation of access tracks, culverts and bridges within ES Chapter 15 Construction Noise (Document 5.15). |
| PEIR Chapter 14 – para 6.5.2, 6.5.3 | Paragraphs 6.5.2 and 6.5.3 comment on the drill and blast associated with the tunnelling. Based on the evidence provided in the PEIR, the Council is not convinced that there would not be adverse impacts on receptors due to air overpressure/noise. An attempt should be made in the ES to provide an evaluation, including qualitative description and reference to information from similar sites as deemed appropriate, to provide an assessment of the likelihood of significant effects. | GC 17.16 | <p>The method of tunnel construction would be through the use of a Tunnel Boring Machine (TBM) or the drill and blast method. Chapter 4 Construction, Operation, Maintenance and Decommissioning of the Proposed Development (Document 5.4) provides a description of tunnel and shaft construction.</p> <p>The use of these methods for tunnelling is common practice and such works are frequently used for quarries. It has therefore been demonstrated that these works can be carried out without causing significant environmental effects. These works will be controlled through design and commitments included in the CEMP (Document 7.4).</p> <p>Blasting has been addressed in Section 9.7 tunnelling works within ES Chapter 15 Construction Noise (Document 5.15).</p> |

| Table 2: Gwynedd Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| PEIR Chapter 14 – para 6.5.10 | In reviewing paragraph 6.5.10, the Council note that National Grid state that tunnelling activity and associated works have the potential to result in a noise and vibration impact. This appears to contradict paragraph 6.5.2. There is potential for National Grid to underestimate significant effects due to noise from blasting. | GC 17.17 | 6.5.10 states that there is the potential for impacts to occur due to tunnelling, whereas 5.5.3 relates specifically to blasting, so there is no contradiction. Blasting has been addressed in Section 9.7 tunnelling works within ES Chapter 15 Construction Noise (Document 5.15). |
| PEIR Chapter 14 – para 6.5.4, 6.5.5 | In relation to bored tunnelling (paragraphs 6.5.4 and 6.5.5) comment is made with respect to the potential for significant effects as a result of the tunnel boring machine (TBM) or the temporary construction railway (TCR). TBM vibration is generally of relatively short duration and the Council therefore expects that any impacts will be sufficiently short lived for there not to be a significant effect. However, this will depend on the ground being bored through, and the distance to noise sensitive receptors. TCRs run throughout the life of the tunnelling, and have been known to result in complaints where receptors are close to the tunnel. Practical mitigation is available provided it is included at the design stage for the TCR and built into the track and operational arrangements. Paragraph 6.5.10 appears to contradict paragraph 6.5.3 with respect to whether or not tunnelling related activity has the potential to result in noise and vibration impact. Further evidence is required to support the conclusion that the TBM will not generate significant effects. Such evidence should reference to evidence for similar ground condition, TBM type and receptor location in the ES. | GC 17.18 | All aspects of noise and vibration related to tunnelling work are considered in Section 9.7 ‘tunnelling works’ within ES Chapter 15 Construction Noise (Document 5.15). The CEMP (Document 7.4) contains mitigation measures and requirements for maximum levels of surface vibration and a requirement that residents would be notified in advance of works taking place including the TBM /drill and blast passage. |
| PEIR Chapter 14 – para 6.5.16 | The Council agrees with paragraph 6.5.16 that there is likely to be a need for additional mitigation for the tunnelling compound. Careful management to minimise above ground night-time activity will be required, and this should be enforced via the CEMP/Code of Construction Practice. The Council notes that the conclusions regarding the need for mitigation have been based on the criteria which it has queries, which are based on what it believes may be an incomplete interpretation of MTAN criteria. Depending on the background noise levels (particularly at night) the impacts may be greater than indicated in the PEIR. | GC 17.19 | Noise/vibration effects arising from the tunnelling compounds have been assessed using appropriate guidance and standards as indicated in Section 4.5 assessment criteria and Section 9.8 tunnelling works within ES Chapter 15 Construction Noise (Document 5.15). As noted in the response to Paragraph 4.3.31 above, it is not considered appropriate to provide an assessment based on background noise levels for this context. |
| PEIR Chapter 14 – Section 7.2 | Section 7.2 sets out mitigation of road traffic noise, however this has only been considered in terms of traffic routing and CEMP. The possible need to provide off-site mitigation during construction works has not been raised and should be considered in reference to the outcomes of the EIA. | GC 17.20 | Moderate/major adverse noise effects from the construction traffic routes have not been identified. Therefore, mitigation for noise from construction traffic routes has not been considered necessary. Please refer to Section 9.9 traffic on construction traffic routes |

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| | | | within ES Chapter 15 Construction Noise (Document 5.15). |
| Part 2 - Response to specific questions asked as part of the consultation: C2. The tunnel under the Menai Straits and associated equipment | The Report contradicts itself on the impact of noise from the tunnelling process, this will depend on the nature of the land that needs to be crossed and how close the houses are from the process. Further evidence will be required to ensure that the underground tunnelling process will not create a substantial impact on residents, due to vibrations during the construction period. | | Potential noise and vibration effects from shaft construction/tunnel boring and drill and blast of the shafts/tunnel have been assessed in Section 9.8 tunnelling works in ES Chapter 15 Construction Noise (Document 5.15). |
| 15 Operational Noise and Vibration | | | |
| | This section refers to Chapter 6 of the PEIR – Operational Noise and Vibration. | GC 18.1 | This comment is noted. |
| | The study area is described as extending "as far as the nearest noise sensitive receptor in each direction". Further it is stated that "Allowances will be made based on the sensitivity of the surrounding receptors in order to identify the receptor most susceptible to adverse effect.". The Council believes that whilst this approach is suitable for scoping (provided the geography is such that the nearest receptor is the worst affected), it does not adequately determine the study area required for an environmental impact assessment (EIA). The EIA will need to consider not just the worst case level, but also the number of receptors affected, and these may include those exposed to a lower level than the worst case receptor. The Council is concerned that the definition of the study area means that the EIA would not provide a comprehensive assessment of and could underestimate the likely significant effects. This needs to be addressed. | GC 18.2 | This comment relates to paragraph 2.1.5 in the PEIR which describes the study areas for the fixed sites such as tunnel head houses and substations. In these locations consideration has not only been given to the noise sensitive receptor (NSR). Further information about the approach taken is provided in section 4 methodology of ES Chapter 16 Operational Noise (Document 5.16). The study area for fixed plant items such as the THHs and Pentir Substation takes into account the sensitivity of surrounding receptors and assumed background sound levels. |
| | The Council suggests that the geographic study area should be defined (as a minimum) as the area over which identifiable impacts are expected to occur. This can only be identified by incremental examination of sound levels through the community to the point where impacts are no longer identified. For the sources described in this section, this can only realistically be determined when sound level information is available on likely sources. | GC 18.3 | The geographic study area is defined in section 6 of ES Chapter 16 Operational Noise (Document 5.16). |

| Table 2: Gwynedd Council | | | |
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| | The Council does not accept the statement set out in paragraphs 3.1.7 and 3.1.8 that the indicative background sound levels that have been assumed represent a realistic worst case for the assessment or are consistent with the approach set out in BS4142:2014. The Council welcomes the statement that baseline noise measurement locations and appropriate baseline will be the subject of consultation as the use of inappropriate background sound levels could underestimate impacts. Discussion of appropriate baseline locations enables GC to bring its local knowledge to ensure the most appropriate locations are selected. | GC 18.4 | National Grid has welcomed the engagement of the Councils in this matter and the determination of baseline has been the subject of discussion at the Stakeholder meetings. The results of the baseline surveys carried out in March/April 2017 are presented in Appendix 15.1 (Document 5.15.2.1). |
| | Paragraphs 3.1.12 to 3.1.14 sets out the description of the technical standards, but does not recognise that TR (T) 94 and EN-5 both refer and rely upon the BS4142:1997 version of the standard. The BS4142:2014 method is a fundamental revision of the standard. It is not appropriate therefore to assume that TR (T) 94 is entirely consistent and compatible with the latest version of the standard. TR (T) 94 should be reviewed to ensure that it remains consistent and compatible with the latest version. The proposed methodology should be justified having regard to all the relevant guidance and standards. The method should be based upon relevant and up to date standards. | GC 18.5 | TR(T)94 provides an approach to assessing noise from overhead transmission lines in dry and wet weather. National Grid does not consider it to be prescriptive in the assessment of impact. The assessment of operational noise has used the OHL noise prediction model in TR(T)94 and the assessment approach of BS4142:2014 as far as practicable. Since BS4142:2014 was published National Grid has carried out work to allow the outputs of TR(T)94 to be interpreted according to current standards and guidance, not just BS4142:2014. A technical summary of the method followed is presented in Appendix 16.3 (Document 5.16.2.3). |
| | Paragraph 3.1.22 states that "it is therefore appropriate to determine sensitivity on a case by case basis at a local level", which the Council welcomes. However, it then goes on to provide Table 15.4, which lists the sensitivities of types of receptor, and makes a judgement which the Council does not think appropriate at this stage. | GC 18.6 | See below. |
| | The Council assumes that Table 15.4 defines the sensitivity of receptors for the whole assessment, however the note within the table refers specifically to night-time noise from OHL with respect to schools, stating that OHL noise will not affect schools as they will not be in use at night. The Council does not consider that this is an appropriate interpretation for a table which determines the sensitivity of receptors for the whole EIA, rather it belongs in the assessment section. The Council does not consider that schools are low sensitivity. In addition, it is not clear how the sensitivity ratings will be used to identify likely significant effects. The method to be used to identify the likely significant effects should be clear and unambiguous, which is not currently the case in the PEIR. Paragraph 3.1.30 does not provide clarity on what categories will be classified as likely significant effects. The Council assumes from other sections of the chapter that "major" and "moderate" will be considered | GC 18.7 | An updated justification for the sensitivity assigned to each receptor is given in section 4 Methodology in ES Chapter 16 Operational Noise (Document 5.16). A description of the method used to identify significant effects and justification as to what is considered significant in EIA terms is also given in section 4 Methodology within ES Chapter 16 Operational Noise (Document 5.16). |

| Table 2: Gwynedd Council | | | |
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| | significant in EIA terms, but this should be explicitly stated, along with any caveats. The sensitivity categories should not be used to adjust the ratings to be used where these are clearly set out in the relevant standards. For example, BS4142:2014 provides a rating method for residential properties. This should be used as the basis of assessing significance. | | |
| | It is not clear from paragraph 3.1.23 whether all or just some parts of BS4142:2014 will be used. Neither is it accepted that the BS4142:2014 is limited. The standard recommends that context should be considered and that context includes consideration of absolute noise levels. It is accepted that WHO Guidance can be used to inform consideration of absolute thresholds. However, it should be recognised that much of the WHO guidance documents are based upon research of transportation noise. The use of more relevant research and evidence should be used where it is available. The proposed methodology should be properly justified and consider the application of BS4142:2014. The best available evidence on the effects of noise from similar sources should be used to inform the assessment. | GC 18.8 | The methodology, including the use of the approach set out in BS4142:2014 has been discussed at the stakeholder meetings and is set out in Appendix 16.3 (Document 5.16.2.3). |
| | The Council welcomes the references to WHO Night Noise Guidelines (NNG), as set out in paragraph 3.1.24. However, it is not deemed appropriate to use the night, outside that quoted in the NNG as a baseline for a BS4142 assessment. It may be appropriate to use a value derived from the NNG to inform an absolute threshold. The Council would welcome discussion with National Grid on this matter. | GC 18.9 | National Grid has welcomed discussions with the Councils on the approach to baseline and method. The results of baseline surveys carried out in March/April 2017 are presented in Appendix 15.1 (Document 5.15.2.1). A technical summary of the method followed for the assessment is provided in Appendix 16.3 (Document 5.16.2.3). |
| | Consideration of the possible effect of tonal noise may be needed when considering absolute criteria. The Council is concerned that an appropriate assessment of effects will not be possible if a 30dB (A) baseline is adopted for all BS4142 based assessments for the project. | GC 18.10 | Tonal noise is considered according the guidelines set out in BS 4142:2014. See previous comments regarding the approach to baseline. |
| | No supporting evidence has been provided for the use of a cut-off of 35 dB for the rating level as stated: "greater than or equal to 35dB" in the High Magnitude of Effect. The reason for the inclusion of the 35dB, and evidence to support it, should be presented. | GC 18.11 | A technical summary of the method followed and the criteria followed are provided in Appendix 16.3 (Document 5.16.2.3). The 35dB cut-off for the rating level is discussed in paragraph 4.6.7 within ES Chapter 16 Operational Noise (Document 5.16). |
| | The Council do not believe that the following statement "Table 15.5 has been amended since the Scoping Report was issued to reflect ongoing discussions with IACC and GC who have suggested setting an absolute criterion. "Discussions on this will continue during | GC 18.12 | Discussions have taken place with IACC and Gwynedd Council on this matter and the method and |

| Table 2: Gwynedd Council | | | |
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| | preparation of the ES" is an accurate reflection of what was discussed between NG and the Councils. Discussions were around the use of an absolute level to determine a level below which adverse effects might not be observed. This would affect only the lower categories of magnitude of effect set out in Table 15.5. The Council welcome ongoing discussions regarding this point. | | criteria are as set out in the technical summary in Appendix 16.3 (Document 5.16.2.3). |
| | The Council does not agree that in all cases the following statement is correct: "The above significance criteria are based on the assessment at locations representing the external façade of properties and, as such, there will be a correspondingly lower assessment when attenuation of buildings is taken into account." The Council suggests that the statement is either caveated with respect to the specific assessment outcomes to which it applies, or it is removed. The Council believes that this type of quality judgement should be provided within the text addressing appropriate individual assessment topics, not in the significance section. For example, a BS4142 assessment is specifically defined as being carried out for noise levels external to properties. It is therefore not appropriate to suggest that the outcome of such an assessment would be less severe if applied indoors. Further engagement is required. | GC 18.13 | The methodology as adopted for this ES is set out in Appendix 16.3 (Document 5.16.2.3) and section 4 of ES Chapter 16 Operational Noise (Document 5.16). |
| | Paragraph 4.1.7 refers to "including the possible removal of plant". Paragraph 5.2 and Table 3.4 include a list of equipment to be installed/removed, which lists additional transformers. There is a similar description for the Pentir substation, with reference to current transformers. The text implies that these are minor transformers for measurement. The Council would appreciate clarification of whether these transformers are of a capacity which could result in noise audible outside of the compound. | GC 18.14 | Section 8 of ES Chapter 16 Operational Noise (Document 5.16) provides clarification for each site. Current transformers do not result in noise that is audible outside the substation boundary. |
| | The Council appreciates the provision of a preliminary assessment of noise levels from the overhead line. However, for the reasons stated above, the Council considers that this assessment is indicative only. It would be helpful if an Appendix to the ES evidence would be provided to enable the reader to confirm that the proposed configuration (L12 Twin redwood) had (as stated) "relatively low noise impact compared to other pylon and conductor designs". A simple table enabling the reader to make comparisons at a specific distance would be sufficient. The statement in paragraph 6.1.2 that the chosen configuration is the quietest system that can be deployed should be justified with sufficient evidence. | GC 18.15 | This information was provided in section 6.8 of the Preferred Route Option Selection Report (Document 7.23). |

| Table 2: Gwynedd Council | | | |
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| | A process should be set out for selecting, agreeing and securing the optimum alignment and location of overhead lines and other equipment that will minimise noise as far as it is practical to do so. | GC 18.16 | The alignment in Gwynedd is informed by the placement of the Tunnel Head House and the connection into Pentir. National Grid has listened to the responses to consultation and this has resulted in a minor amendment to the proposed alignment since Stage Three Consultation, these are described in the Design Report (Document 7.17). |
| 16 Socio-Economics | | | |
| | This section refers to Chapter 16 of the PEIR – Socio-Economics. | GC 19.1 | Noted |
| | The findings presented within the PEIR for assessment of socio-economic impacts are preliminary and incomplete at this stage. Paragraph 8.3.20 describes the potential project wide effects associated with the introduction of workers. Further details on the numbers, timing and profile of workers is required and an indication how local labour / contractors would be provided the opportunity to take up construction contracts. The Council notes that the estimated peak workforce is 400 workers. In order to assess the impact in terms of accommodation and expenditure it is important to know the assumed profile of home based worker numbers, situated across Anglesey and Gwynedd. | GC 19.2 | Comment noted and addressed in ES Chapter 17 Socio Economics (Document 5.17), section 7 (Baseline Conditions), section 8 (Potential Effects) and section 9 (Mitigation and Residual Effects). |
| | The Council awaits the Visitor Behaviour Survey results and notes that these may influence the level of impact assessed thus far. Whilst disruption during construction could result in a reduction in visitors to particular areas / sites, it has been suggested that these visits would be displaced elsewhere within Gwynedd as opposed to resulting in a net loss of visitors. | GC 19.3 | Comment noted and addressed in ES Chapter 17 Socio Economics (Document 5.17) Section 7 (Baseline Conditions), section 8 (Potential Effects) and section 9 (Mitigation and Residual Effects). |
| | Section 8.4 sets out the mitigation proposals and suggests that further socio-economic specific measures could include i) development of a supply chain strategy, ii) local sourcing of construction materials, and iii) development of a worker accommodation strategy during construction. The Council suggests that such measures should be developed in addition to workforce development (see above) to maximise the benefits to the local economy and minimise the impacts on people, businesses and places. Limited details have been provided on how labour / contractor opportunities will be promoted. For example, through a commitment to enabling local contractors to compete for the opportunities, a commitment to specify contractors to set out the number of jobs to be created, through a number of apprenticeships / work experience places they will offer. The Council consider that a Supply Chain Strategy/Workforce Development Strategy and Procurement Strategy is essential. | GC 19.4 | As no significant socio-economic effects are identified for the Proposed Development, no mitigation is proposed. No enhancement measures are described in Chapter 17 Socio Economics. Proposed enhancement measures are documented in the Enhancement Strategy (Document 7.13), a draft of which was provided to Gwynedd Council prior to submission of the DCO for comment. |

| Table 2: Gwynedd Council | | | |
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| | The report suggests that other major projects located in Anglesey and north Gwynedd could also result in cumulative effects in terms of general construction disturbance affecting visitors' perceptions of the area and a consequent reduction in visitor numbers / associated expenditure. This is of acute interest to the Council and further consultation is required as to the outcome of this assessment and mitigation measures proposed. The Council is concerned about the potential impact on the Welsh language and communities in Gwynedd and requires assurances that there will be an agreed methodology to assess potential impacts. The availability of accommodation for workers is also of concern – particularly in combination with the impact of the construction of Wylfa Newydd. | GC 19.5 | Comment noted and addressed in ES Chapter 17 Socio Economics (Document 5.17), section 10 Cumulative Effects Assessment. A WLIA has been undertaken and is reported as Document 5.26 . |
| | The statement "it is considered unlikely that there would be a material increase on the overall significant effects" is not adequately supported by evidence at this stage. | GC 19.6 | Noted. ES Chapter 17 Socio Economics (Document 5.17) section 9 provides the assessment of socio-economic effects, which is supported by evidence provided in section 7 Baseline Conditions. |
| 17 Intra-Project Effects | | | |
| | This section refers to Chapter 16 of the PEIR – Intra-Project Effects. | GC 20.1 | This comment is noted. |
| | The Council considers that the assessment of intra-project effects should be revisited when the EIA has progressed sufficiently to resolve the level of uncertainty relating to effects yet to be quantified or considered unlikely without further supporting evidence. | GC 20.2 | The intra-project cumulative effects assessment is presented in Chapter 19 of the ES (Document 5.19), a draft of which was issued to key technical stakeholders for comment. |
| | Paragraph 2.1.3 states that intra-project impacts are assessed on a non-human and human basis. The Council seeks clarification on this however, as the content of the table appears to confuse the two types of receptors, for example where Public Rights of Way (PROW) users are considered in the non-human table. The separation seems artificial given that consideration should be given to non-human and human receptors in combination. | GC 20.3 | The assessment approach for intra-project effects has been revised since the publication of the PEIR. Some environmental topics share no receptors with others and no interactions are likely to occur. Environmental topics excluded from this assessment include Chapter 10 Historic Environment (Document 5.10), Chapter 11 Geology, Hydrology and Ground Conditions (Document 5.11), Chapter 12 Water Quality, Resources and Flood Risk (Document 5.12) and Chapter 18 Agriculture (Document 5.18). Where multiple sources of effects are already considered within one chapter, the findings are not repeated in the intra-project effects assessment, this includes Chapter 9 Ecology and Nature Conservation |

| Table 2: Gwynedd Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | (Document 5.9) and Chapter 17 Socio-Economics (Document 5.17). Chapter 19 Intra-Project Cumulative Effects (Document 5.19) only considers interactions on receptors that are considered in two or more separate chapters. As a result, only residential receptors are assessed in the intra-project effects assessment. |
| | Paragraph 2.1.3 also suggests that both construction and operational effects have been assessed, although the Council notes that the content of the table contains very little commentary on operational effects. A checklist approach for both construction and operational effects would be helpful to ensure that there are no omissions. | GC 20.4 | The intra-project effects table in Chapter 19 Intra-Project Cumulative Effects (Document 5.19) clearly distinguishes between combined effects during the construction and operational stage of the Proposed Development. |
| | The Council suggests that the evidence base to support conclusions should be signposted throughout the chapter to other chapters in the PEIR/ES, and the conclusions summarised so that meaningful conclusions as to intra-project effects can be understood. | GC 20.5 | Agreed. The evidence base to support conclusions within the intra-project effects assessment is cross-referenced to the relevant technical chapter. |
| | The Council does not agree that when a PROW is subject to closures there will be no intra-project effect. National Grid should explain how the effects on amenity is assessed and how it will be mitigated. It is essential that the duration and location of closures is determined and assessed in consideration of individual and community receptors. | GC 20.6 | The effects of the Proposed Development on PROW are assessed in ES Chapter 13 Traffic and Transport (Document 5.13). A PROW Management Plan (Document 7.6) has been produced to manage the effects on the PROW network. No permanent closures are proposed. Some minor diversions are included in order to enable the Proposed Development, and these diversions will only be in place for a temporary period. |
| | Reference must be made to the wider health impact assessment for the project when considering potential impacts on health associated, for example, intra-project effects during construction relating to air quality, traffic and noise disturbance. | GC 20.7 | For information about the wider health and well-being impacts from the Proposed Development please refer to the WBR (Document 5.27). |
| | The Council considers that the means by which and location of assessment of amenity effects is ambiguous, referring to individual assessment chapters without drawing any conclusions as to intra-project and socio-economic effects. | GC 20.8 | Receptors considered in Chapter 19 Intra-Project Cumulative Effects (Document 5.19) have been assessed for amenity effects, in conjunction with other sources of effect where relevant. |
| | Paragraph 3.1.5 states that no significant effects are identified requiring mitigation lacks supporting evidence at this stage. The Council considers that further mitigation may be | GC 20.9 | The assessment is reported in Chapter 19 Intra-Project Cumulative Effects (Document 5.19), |

| Table 2: Gwynedd Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | required, particularly in consideration of intra-project effects on local receptors associated with construction disturbance (noise, air quality etc.), designated nature conservation sites, and amenity impacts on users of PROW. | | however all effects are considered to be not significant. |
| | The Council notes that no consideration has been given to enhancement or compensation measures, which are expected by the Council to feature within the DCO submission. Further assessment and consultation is required to comply with National Grid's wider policy obligations. | GC 20.10 | No compensation measures have been identified. Enhancement measures are detailed in the Enhancement Strategy (Document 7.13), a draft of which was provided to Gwynedd Council prior to submission of the DCO for comment. |
| 18 Inter-Project Effects | | | |
| | This section refers to Chapter 17 of the PEIR – Inter-Project Effects. | GC 21.1 | This comment is noted. |
| | Table 18.4 contains the preliminary assessment of effects, however the Council consider that the drawing together of conclusions lacks a robust evidence base at this stage due to the level of maturity of the EIA assessment. The cumulative assessment in this chapter must therefore be kept under review and should be subject to further consultation. | GC 21.2 | The Inter-Project Effects CEA has been updated for the ES and is provided in Chapter 20 Inter-Project Cumulative Effects (Document 5.20). |
| | It is noted that the key conclusions are reported in the individual assessment chapters rather than Chapter 19. The Council considers cross-referencing to be essential. | GC 21.3 | This comment is noted. |
| 19 Statement of Combined Effects with Wider Works | | | |
| | This section refers to Chapter 18 of the PEIR – Statement of Combined Effects with Wider Works. | GC 22.1 | This comment is noted. |
| | The cumulative effects assessment relies upon any overlap assumed in construction programme. It is essential that the assessment is re-visited should there be any change in relevant project programmes. | GC 22.2 | This comment is noted. |
| | Construction routes for each element of the wider works have not been identified. The Council notes that construction routes should be clarified so that any impacts on the highway network within Gwynedd can be understood and mitigation agreed as appropriate prior to DCO submission. | GC 22.3 | Construction traffic routes shared by the Proposed Development and the Wider Works are identified in Chapter 21 Combined Effects with the Wider Works (Document 5.21). |

| Table 2: Gwynedd Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| 20 Summary of Potential Effects | | | |
| | This section refers to Chapter 21 of the PEIR – Summary of Potential Effects. | GC 23.1 | This comment is noted. |
| | The role and purpose of this chapter is unclear. As a Summary, the 208 pages makes this extremely lengthy. The Council expect that a Non-Technical Summary would be submitted to accompany the ES for the purposes of the DCO, which is likely to include much of the same information. A summary of mitigation commitments would also be expected within the ES and would be more helpful as a chapter within the ES. | GC 23.2 | A Non-Technical Summary has been prepared and is provided as ES Document 5.0 . A Schedule of Mitigation (Document 5.28) has been prepared, and provides a summary of mitigation commitments. |
| | Due to the volume of consultation material with the PEIR and wider documentation, and preliminary nature of predicted impacts, the Council have not undertaken a consistency review or gap analysis appraisal of the technical material contained within this chapter. | GC 23.3 | This comment is noted. |
| | The assessment tables provide an initial assessment of whether predicted impacts are likely or unlikely to be significant. This chapter does not apply assessment methodology in the way that is set out in Chapter 5 of the PEIR. It is not possible to review the adequacy of these statements within the application of EIA assessment methodology, which would typically result in magnitude and sensitivity being determined and appraised to conclude the degree of significant effects predicted. The relevant discipline specific issues are highlighted in response to each topic chapter and not repeated here. | GC 23.4 | Since the publication of the PEIR, each of the technical chapters (Documents 5.7 to 5.18) includes a detailed methodology in section 4. |
| 21 Response to Relevant Consultation Questions | | | |
| | National Grid have set out in their Feedback Form a number of open questions on which comments are invited. Whilst the questions posed by National Grid may be of use in driving feedback on particular elements of the project, they can only represent a partial response to the project. The scope of the questions posed are not considered by the Council to be sufficient to drive balanced feedback, and the phraseology of the questions could have been more effective in ensuring that respondents have a fair opportunity to engage. | GC 24.1 | National Grid has been open in explaining its work and has sought to provide members of the public and stakeholders significant opportunities to influence the proposals. Three defined periods of consultation have been undertaken where people were actively encouraged to provide feedback. The first was undertaken in 2012, followed by a second in 2015 and then the statutory consultation in 2016. Further localised consultation has occurred since then. At each stage, National Grid has put forward a range of options or proposals for people to comment on, and |

| Table 2: Gwynedd Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | <p>welcomed feedback on any aspect of the Project. The feedback received both during and between consultation stages has been influential in refining the options considered and influencing the nature of the Project.</p> <p>To aid engagement by the public, the PEIR was presented by section of the route to allow readers to focus on potential effects in geographical areas. Chapter 21 of the PEIR provided a summary of the environmental baseline and potential effects by section of the route, and a non-technical summary of the PEIR was also published.</p> <p>Other information presented by National Grid for the statutory Stage Three Consultation included detailed plans of the Project and technical reports detailing the work undertaken to develop the proposed connection.</p> <p>In response to the information presented, including the PEIR, useful and meaningful feedback was received from both technical and non-technical consultees on the development of the Project as well as potential environmental effects and possible mitigation measures, which has further informed production of the Project's ES.</p> |
| | In reviewing the Council's consultation response, the Council would encourage National Grid to review the responses to questions as well as related specific commentary drawn through the Council's examination of the PEIR and wider documents made available in support of Section 42 Consultation. The Council's response to the consultation questions is included in Part 2 of the Council's response. | GC 24.2 | This comment is noted. |
| 22 Adequacy of Consultation | | | |
| | This section of the Council's response sets out the Council's observations regarding the adequacy of consultation to date undertaken by National Grid in respect of the North Wales Connection Project proposals. Consideration has been given to the extent to which | GC 25.1 | This comment is noted. |

| Table 2: Gwynedd Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | National Grid has responded to issues raised by the Council at the previous consultation stage. | | |
| | At Stage 2 Consultation, the Council welcomed National Grid's intention to underground cables across the Menai Strait. The Council noted that a preference existed for the undergrounding of cables to continue to Pentir and suggested that the costs should be presented for consultation. As part of the Section 42 consultation, National Grid have presented the preferred route option, which involves undergrounding up until 1km from Pentir. At this stage of consultation, the Council requests information again on the costing of options and justification for the proposals not to underground further to Pentir. | GC 25.2 | <p>National Grid carefully considered the siting of the Ty Fodol tunnel head house within Gwynedd and the use of both overhead line and underground cables to complete the connection to Pentir substation. The options in this area were revisited as a result of the consultation comments received in feedback to the Stage Three Consultation, but no new information was presented that altered the above analysis. This is described in the Back-check of Wylfa-Pentir Design Decisions Report (Document 7.18).</p> <p>National Grid's response to the comments of Gwynedd Council on the Strategic Options Report and Need Case are provided in Appendix 33 to the Consultation Report (Document 6.2)</p> |
| | At Stage 2 Consultation, the Council expressed disappointment with the fragmentation of consultation. The Council welcomes the depth of information provided at Section 42 consultation. Although highly technical, the consultation material provides a breakdown of the proposed route, including the methods proposed for undergrounding the cable at the Menai Strait. This was missing at the previous round of consultation and is welcomed by the Council. | GC 25.3 | This comment is noted. |
| | The Council also noted at Stage 2 Consultation that National Grid should consider in an appropriate level of detail the proposals to build another bridge over the Menai. National Grid have failed to include this in the Section 42 consultation documents and request further dialogue on this matter. | GC 25.4 | <p>National Grid has worked, and continues to work, closely with Welsh Government on their plans for a third crossing at the Menai Strait. Welsh Government officials are keen to understand if it's possible for a bridge to carry the new electrical connection needed for Wylfa Newydd. As part of this, Welsh Government has commissioned National Grid to undertake a feasibility study into potential options to use the bridge.</p> <p>There are a lot of things to consider before National Grid and Welsh Government will be able to understand if putting cables of the size required for the new electrical connection on a new bridge is</p> |

| Table 2: Gwynedd Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | <p>possible. To our knowledge, there are no high voltage transmission cables on a bridge anywhere in the world. Costs, technical considerations, route on and off the bridge and timing are just some of the things to be worked out.</p> <p>In addition, any proposal for a third Menai crossing put forward by Welsh Government needs to be consented and funded before it can go ahead.</p> <p>At the same time, it's vital that National Grid is able to deliver a connection for Horizon in the mid-2020s, when it is expected that Wylfa Newydd would start generating. This is why National Grid is continuing with the plans for a tunnel under the Menai Strait. When completed, the feasibility findings will be considered and next steps agreed.</p> <p>Inter project cumulative effects related to the Third Menai Crossing have been assessed for all topics in Chapter 20 Inter-Project Cumulative Effects (Document 5.20).</p> |
| | <p>The maturity of the impact assessment presented in the PEIR varies across topic disciplines, as a reflection of incomplete survey programmes at this stage. The Council's ability to meaningfully engage on assessment outcomes and proposed mitigation measures is therefore limited until impacts are fully understood. It is expected that this will be addressed through further consultation prior to DCO submission on the emerging outcomes of the EIA. The lack of proposal for mitigation, enhancement and compensation measures within the Section 42 documentation is disappointing at this stage. It is essential that mitigation, enhancement and compensation measures are consulted on prior to DCO submission.</p> | GC 25.5 | <p>In line with applicable guidance at the time, including PINS Advice Note 7 (March 2015), National Grid used professional judgement to determine the level and type of detail in the PEIR taking account of the:</p> <p><i>“stage in the design process the consultation was carried out;</i></p> <p><i>the target audience; and</i></p> <p><i>the complexity of the proposed development and the receiving environment”.</i></p> <p>PINS Advice Note 7 (March 2015) also sets out that the PEIR is not expected to replicate or be a draft of the Environmental Statement.</p> |

| Table 2: Gwynedd Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | <p>In compliance with the above, National Grid ensured that the PEIR contained sufficient information to enable both technical and non-technical consultees to develop an informed view of the likely significant environmental effects of the proposed development and to provide detailed comments on the design and mitigation proposed, as appropriate for that stage.</p> <p>Other information presented by National Grid for the statutory Stage Three Consultation included detailed plans of the Project and technical reports detailing the work undertaken to develop the proposed connection.</p> <p>In response to the information presented, including the PEIR, useful and meaningful feedback was received from both technical and non-technical consultees on the development of the Project as well as potential environmental effects and possible mitigation measures, which has further informed production of the Project's ES.</p> <p>The information provided for the Stage Three Consultation is considered appropriate, according with the requirements of applicable statute and Government guidance and being in line with best practice on other similar consented Nationally Significant Infrastructure Projects (NSIPs).</p> <p>National Grid shared a draft ES with Gwynedd Council, receiving detailed comments which were able to be considered and taken in to account where appropriate in finalising the ES.</p> <p>Proposed enhancement measures are documented in the Enhancement Strategy (Document 7.13), a draft of which was provided to Gwynedd Council prior to submission of the DCO for comment.</p> |
| 23 Recommendations | | | |

| Table 2: Gwynedd Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | This report has provided an overview of the Council's position in relation to the Preliminary Environmental Impact Report, published as part of the Section 47 consultation material. | GC 26.1 | This comment is noted. |
| | Sections 3 – 5 of this report provide an overview of the introductory chapters of the PEIR and requests further information on a number of matters for clarity. This includes, the requirements for a marine licence, and further information on the cost analysis taken to date and as the project progresses. | GC 26.2 | This comment is noted. Detailed responses to these comments are provided above. |
| | Sections 6 – 20 of this report have provided a breakdown of the Council's concerns relating to technical matters. As has been noted throughout these sections, the consultation material remains lacking in baseline data which makes the assessment and mitigation process difficult to consider effectively. National Grid should ensure that further consultation on these matters is ongoing so as to ensure adequacy of engagement with stakeholders. | GC 26.3 | This comment is noted. Detailed responses to these comments are provided above. National Grid shared a draft ES with Gwynedd Council, receiving detailed comments which were able to be considered and taken in to account where appropriate in finalising the ES. |
| | Section 21 of this report provides responses to the questions set out in National Grid's feedback questionnaire. The Council notes that these questions are not adequate in encouraging an effective stakeholder response. Where relevant, this section refers to other sections of the report in each question response. It is recommended that National Grid consider a way of documenting consultation feedback and providing transparency on whether or not comments have been addressed and, if not, justification should be provided. | GC 26.4 | The information provided for the Stage Three Consultation is considered appropriate, according with the requirements of applicable statute and Government guidance and being in line with best practice on other similar consented Nationally Significant Infrastructure Projects (NSIPs). In response to the information presented, including the PEIR, useful and meaningful feedback was received from both technical and non-technical consultees on the development of the Project as well as potential environmental effects and possible mitigation measures, which has further informed production of the Project's ES. |
| | Section 22 of this report focusses on the comments raised by the Council in December 2015 at Stage 2 Consultation, and provides an update on the Council's standing following publication of the Section 42 consultation material. | GC 26.5 | This comment is noted. |
| | The maturity of the impact assessment presented in the PEIR varies across topic disciplines, and as a result the Council's ability to meaningfully engage on assessment outcomes and proposed mitigation measures is therefore limited until impacts are fully understood. It is expected that this will be addressed through further consultation prior to DCO submission on the emerging outcomes of the EIA. It is proposed that further technical | GC 26.6 | National Grid has worked with Gwynedd Council throughout the development of the Project and in undertaking the environmental impact assessment (EIA), and will continue to work with it throughout the Examination period and beyond. This proactive |

| Table 2: Gwynedd Council | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | engagement be undertaken by National Grid to resolve the matters set out under the discipline-specific headings of this report. | | <p>engagement included thematic group meetings in relation to landscape and visual, ecology, the historic environment, traffic and transport, air quality, noise, socio-economic (including tourism), Welsh language, waste and materials, mitigation and enhancement. Through these meetings information was shared where possible to enable informed discussions to take place and to obtain technical feedback from the Gwynedd Council officers. Detail of the engagement with the Gwynedd Council in relation to the EIA is provided in ES Chapter 5: EIA Consultation (Document 5.5) and each relevant chapter of the ES contained in Volume 5 of the DCO application.</p> <p>Alongside the thematic group meetings, stakeholder briefings were held involving Gwynedd Council to update all technical officers on the latest progress with the Project and proposed working methods.</p> <p>In addition, National Grid shared a draft ES with Gwynedd Council, receiving detailed comments which were able to be considered and taken in to account in finalising the ES.</p> <p>Proposed enhancement measures are documented in the Enhancement Strategy (Document 7.13), a draft of which was provided to Gwynedd Council prior to submission of the DCO for comment.</p> <p>National Grid continues to work with Gwynedd Council with a view to agreeing a Statement of Common Ground.</p> |
| | The lack of proposal for mitigation, enhancement and compensation measures within the Section 42 documentation is disappointing at this stage. It is essential that mitigation, enhancement and compensation measures are consulted on prior to DCO submission. | GC 26.7 | Please see the response immediately above. |

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4 Natural Resources Wales

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| Table 3: Natural Resources Wales | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | Thank you for consulting Natural Resources Wales (NRW) under Section 42 of the Planning Act 2008 (as amended). We note that the consultation documentation includes the Preliminary Environmental Information Report (PEIR) and acknowledge that the aim of the PEIR consultation is to provide sufficient information to help stakeholders to understand the main environmental effects that could result from the North Wales Connection Project, and to allow an opportunity to comment on the proposed scope of the Environmental Impact Assessment (EIA) (which will ultimately be reported in the Environmental Statement (ES)). | NRW 1.1 | This comment is noted. |
| | The comments contained in this letter and it's annex comprise NRW's response to this statutory consultation under Section 42 the Planning Act 2008 (as amended) and Regulation 3 of the Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009. | NRW 1.2 | This comment is noted. |
| | Please note that our comments are without prejudice to any comments we may subsequently wish to make when consulted as part of any further formal pre-application consultation, or during the submission of more detailed information or on the Environmental Statement. At such time there may be new information available to us which we will need to take into account in making a formal response to the Planning Inspectorate (PINS) / Secretary of State (SoS). NRW reserves the right to make such further comments and representations during the course of the application process, as may be required. | NRW 1.3 | This comment is noted. |
| | In addition to being an interested party under the Planning Act 2008 (as amended), NRW exercises functions under distinct legislation including (but not limited to) the Environmental Permitting (England and Wales) Regulations 2010, Water Resources Act 1991 and Marine and Coastal Access Act 2009. For the avoidance of doubt, any comments or requests for information which may be made by NRW should therefore be looked at solely in the context of the regime within which they fall and should not be construed as having any bearing or binding effect on the other functions. | NRW 1.4 | This comment is noted. |
| | Our detailed comments on the PEIR can be found in Annex I. | NRW 1.5 | This comment is noted. |
| | We consider that the PEIR consultation has presented preliminary information about the potential significant environmental effects of the Proposed Project, as they are understood at this point in the pre-submission/design process and gives an indication as to whether identified environmental effects would be likely or unlikely to be significant. However we are not able to confirm at this stage of the consultation whether effects are likely or the scale of any significant effects due to outstanding information and assessments required as detailed in Annex 1. | NRW 1.6 | This comment is noted. |

| Table 3: Natural Resources Wales | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>To summarise, our comments included in Annex 1 confirm the following;</p> <p>Landscape and Visual Effects – We advise that the preliminary assessment of development effects accord with our understanding of the likely issues. At this stage in the consultation we consider that there is potential for localised effects on the setting of the Ynys Mon Area of Outstanding Natural Beauty (AONB) in Section A and B and an intensification of development within the Snowdonia skyline in Section D and F. However at this stage of the consultation we are not able to confirm whether effects are likely and where any significant effects are likely until further detailed assessment work has been undertaken as detailed in Annex 1.</p> | NRW 1.7 | Comment noted. Please see response to detailed comments provided below. |
| | <p>Ecology and Nature Conservation – The proposal as identified in the PEIR has possible implications for both European and National Protected Sites. The ES needs to identify and assess all possible impact pathways and where impacts are considered likely, full details of the appropriate mitigation and/or compensation measures that are included as part of the proposal need to be provided in the ES. At this stage we are not able to confirm if the proposal is likely to have a significant effect on protected sites. We recommend that National Grid scope the HRA with us at the earliest convenience.</p> <p>With regards to protected species, the ES needs to clearly identify all likely effects on protected species and where required propose and deliver appropriate mitigation and/or compensation schemes to ensure that the proposal has no detrimental impact on the favourable conservation status of European Protected Species.</p> | NRW 1.8 | Comment noted. Please see response to detailed comments provided below. |
| | <p>Geology, Hydrogeology and Groundwater Protection – We acknowledge that an Intrusive Site Investigation is to be carried out in those areas where the possibility for contamination has been highlighted in the desk study. We also acknowledge that Ground Investigation Studies are to be undertaken to inform the tunnel design. The ES needs to include full details of the tunnel design and construction method.</p> | NRW 1.9 | Comment noted. Please see response to detailed comments provided below. |
| | <p>Water Quality, Resources and Flood Risk – The ES and CEMP needs to include a robust strategy to demonstrate that run off from the construction phase including construction of haul road for access is to be controlled. We recommend that the scope of the Flood Consequence Assessment and Water Framework Directive Assessment is discussed with us prior to preparation.</p> | NRW 1.10 | Discussions have been held with NRW on the scope of the FCA and WFD Assessments as outlined in Appendix 12.1 (Document 5.12.2.1) and 12.5 (Document 5.12.2.5) and Chapter 5 EIA Consultation (Document 5.5). The CEMP (Document 7.4) includes a range of mitigation measures which are secured through Requirement 6 of the DCO and presented in Table 12.20 within ES Chapter 12 Water Quality, Resources and Flood Risk (Document 5.12). Measures WE 51 - |

| Table 3: Natural Resources Wales | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | 53 would help control run off from haul roads (referred to as access tracks in this ES). |
| | Air Quality – The project has the potential to affect air quality and have in-direct effects on protected sites during the construction phase, due to both air pollution and dust. The ES needs to include an assessment of the predicted pollution impact of the development on protected sites. At this stage we are not able to confirm if the proposal is likely to affect air quality and have an in-direct effect on protected sites. | NRW 1.11 | Comment noted. Please see response to detailed comments provided below. |
| | Noise and Vibration - The ES should clearly set out how impacts of noise and vibration on protected species have been assessed and detail any required mitigation and/or compensation measures. | NRW 1.12 | Comment noted. Please see response to detailed comments provided below. |
| | Construction Environmental Management Plan (CEMP) – The ES needs to include a comprehensive and site specific CEMP addressing all relevant environmental issues and identify methods of working in line with best practice to ensure environmental safeguards are in place. | NRW 1.13 | Comment noted. Please see response to detailed comments provided below. |
| Compliance with NRW's General Purpose | | | |
| | NRW is satisfied that this advice is consistent with its general purpose of pursuing the sustainable management of natural resources in relation to Wales, and applying the principles of sustainable management of natural resources. In particular, NRW acknowledges that the principles of sustainable management include taking account and gathering of all relevant evidence in respect of uncertainties, and taking account of the short, medium and long term consequences of actions. | NRW 2.1 | This comment is noted. |
| | NRW further acknowledges that it is an objective of sustainable management to maintain and enhance the resilience of ecosystems and the benefits they provide and, in so doing meets the needs of present generations of people without compromising the ability of future generations to meet their needs, and contribute to the achievement of the well-being goals in section 4 of the Well-being of Future Generations (Wales) Act 2015. | NRW 2.2 | This comment is noted. |
| | We trust that our comments will be taken into consideration and that the ES will incorporate our advice and requirements in order for us to be able to fully assess the possible environmental effects that could result from the North Wales Connection Project. | NRW 2.3 | The ES incorporates the advice and requirements provided by NRW where relevant, to assist NRW in fully assessing the possible environmental effects |

| Table 3: Natural Resources Wales | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | which could result from the Proposed Development. |
| ANNEX I - Application by National Grid Electricity Transmission Plc for an Order Granting Development Consent for the North Wales Connection Project. Preliminary Environmental Information Report (PEIR) | | | |
| 1 Landscape and Visual Effects | | | |
| | We have reviewed the PEIR (Chapters 6 and 7) in relation to the presentation of the baseline and preliminary effects of the North Wales Connection project for the Ynys Mon AONB and Snowdonia National Park. | NRW 2.4 | This comment is noted. |
| | NRW is advising on potential effects the scheme may have on the purposes of National Parks and AONBs | NRW 2.5 | This comment is noted. |
| | Generally, we are satisfied with the scope, methodology, and baseline survey representation of the study area. Based on the information included in the PEIR, our preliminary assessment of development effects accord with our understanding of the likely issues. However we cannot confirm the scale of any significant affects at this stage of the consultation until further detailed assessment work has been undertaken as described below. | NRW 2.6 | This comment is noted. Section 9 in Chapter 7, Landscape Assessment (Document 5.7) and Chapter 8, Visual Assessment (Document 5.8) report on the effects of the Proposed Development. |
| Chapter 6 Landscape Assessment | | | |
| <i>3 - Methodology and Basis of assessment - Table 7.1 Issues raised and Responses to the SoS Scoping Opinion</i> | Chapter 6, Section 3, Table 7.1, item 3.58 identifies that the Secretary of State (SoS) queried the Zone of Theoretical Visibility (ZTV) model used. The response refers to PEIR Appendix 7.1. Although we note that Appendix 7.1 sets out the viewpoints it does not include any details of the ZTV model used. The ES needs to include the full details of the ZTV used. | NRW 2.7 | The methodology for the ZTVs can be found in Section 4 of Chapter 8, Visual Assessment (Document 5.8). The ZTV's are visually represented in the following figures: <ul style="list-style-type: none"> Figure 8.2 - ZTV Overhead Line (Document 5.8.1.2) Figure 8.3 - ZTV Braint Tunnel Head House and Cable Sealing End Compound (Document 5.8.1.3) |

| Table 3: Natural Resources Wales | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | <ul style="list-style-type: none"> Figure 8.4 - ZTV Ty Fodol Tunnel Head House and Cable Sealing End Compound (Document 5.8.1.4) Figure 8.5 - ZTV Wylfa Substation (Document 5.8.1.5) Figure 8.6 - ZTV Pentir Substation (Document 5.8.1.6) |
| 4 <i>Baseline Conditions</i> | The landscape baseline is outlined in Chapter 6, Section 4 and captures the Ynys Mon AONB and its extent. Description of the area's character and special qualities are touched upon for the coastline, but Mynydd Bodafon less so, although the Preliminary Appraisal of Construction Effects refers to anticipated potential effects upon the remoteness and tranquillity of both. We consider that the special qualities of Mynydd Bodafon needs to be clearly set out given the close proximity of the proposed line within the setting of the AONB at this point. | NRW 2.8 | The assessment effects on the landscape are reported in Section 9 of Chapter 7 Landscape Assessment (Document 5.7). This includes assessment of effects on the Anglesey AONB (including Mynydd Bodafon). |
| | We also consider that the intervisibility with the Snowdonia National Park needs to be described where the Snowdonia skyline forms a distinctive backdrop. This has been done for section F, but is also relevant to other sections of the work. There is some crossover with the visual effects chapter here, so methodical recording and description is necessary in one or both chapters. | NRW 2.9 | <p>This comment is noted.</p> <p>The assessment of effects on the landscape are reported in Section 9 of Chapter 7 Landscape Assessment (Document 5.7 and visual in Chapter 8, Visual Assessment (Document 5.8).</p> <p>The VSAA Character Assessment in Appendix 7.2 (Document 5.7.2.2) describes judgements regarding the value, susceptibility and sensitivity of the landscape. Judgements related to this take into consideration intervisibility with Snowdonia National Park. Where the Snowdonia skyline forms a distinctive backdrop to a VSAA this is also noted.</p> <p>The Viewpoint Assessment (Document 5.8.2.2) includes descriptions of key views towards Snowdonia National Park. Results from this appendix have fed into the assessments by receptor in Section 9 of Chapter 8, Visual Assessment (Document 5.8).</p> |

| Table 3: Natural Resources Wales | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | Sensitivity assessment values and mapping have been provided. However the PEIR consultation does not include the sensitivity assessment technical report for us to be able to comment on this aspect. We understand that the sensitivity assessment technical report will form the subject of a separate consultation and therefore we reserve our comments on the Sensitivity Assessment Values and Mapping until we have been provided with the Sensitivity Technical Report. | NRW 2.10 | Sensitivity assessments are presented in Chapter 7, Landscape Assessment (Document 5.7) and Appendix 7.2 VSAA Character Assessment (Document 5.7.2.2). |
| 5 Preliminary Appraisal of Potential Effects | The PIER's discussion of effects upon views to and from the Ynys Mon AONB and Snowdonia National Park could be better presented as a Receptor that deals with both effects upon perceptions of tranquillity and remoteness (effects upon Natural Beauty /landscape receptor) and enjoyment of visual amenity (effects upon recreational receptors). This would allow all issues relating to designated landscapes to be presented in a concise and co-ordinated way. From picking through the viewpoints relevant to these considerations and then referring back to the report assessment text, it is unclear at this stage as to what sensitivity weighting has been applied for the assessed significant/ not significant effect, Sensitivity being higher for designated landscape considerations and significant effects triggered at lower scales of change. | NRW 2.11 | The assessment of effects on landscape designations are reported in Chapter 7 Landscape Assessment (Document 5.7). This includes assessment of effects on Snowdonia National Park and the Anglesey AONB and makes reference to Appendix 8.2, Viewpoint Assessment (Document 5.8.2.2). |
| | Chapter 6, Section 5 has considered the temporary construction disturbance effects of the North Wales Connection Project. Effects upon the Ynys Mon AONB remoteness and tranquillity are assessed to be temporary and not significant. | NRW 2.12 | This comment is noted. The assessment of effects on the landscape are reported in Chapter 7 Landscape Assessment (Document 5.7) which includes assessment of construction effects on Anglesey AONB. |
| | Section 5 has also considered permanent construction disturbance effects. | NRW 2.13 | This comment is noted. |
| | From our review of the PEIR we summarise below the designated landscape setting issues of the six sections of the proposal. These notes are based upon what is set out in the PEIR supplemented by our own view of the proposal. The PEIR at this stage refers only generally to whether effects are likely and where significant effects are likely. Due to the very preliminary nature of the assessment and there being a number of areas where we do need additional information to inform our assessment, we cannot at this stage of the consultation fully concur with the assessment and conclusions set out in the PEIR. | NRW 2.14 | The assessment of effects on landscape designations including setting are reported in Chapter 7 Landscape Assessment (Document 5.7). |
| | Section A - The new 400 kV overhead line would sit within a landscape which is already affected by a concentration of modern infrastructure. The proposal would not fundamentally change the character of the landscape. There is potential for localised effects on the setting of the AONB in the north where the proposal lies closer to the AONB. However these would be seen within the context of the proposed Wylfa Newydd project. | NRW 2.15 | This comment is noted. |

| Table 3: Natural Resources Wales | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | Section B – This section lies at some distance to the AONB, with no effects to its setting. | NRW 2.16 | This comment is noted. |
| | Section C – The proposal would in-combination with existing overhead infrastructure intensify development along skylines at Capel Coch where it would be intervisible with distinctive backdrop of Snowdonia. The PEIR refers to localised effects on the inland setting of the AONB (at Mynydd Bodafon) and effects upon views of Snowdonia but does not clarify whether this is significant or not. | NRW 2.17 | This comment is noted. The assessment of effects on the landscape are reported in Chapter 7 Landscape Assessment (Document 5.7) which includes assessment of construction effects on Anglesey AONB. |
| | Section D – Preliminary effects have not been presented for this section and this needs to be addressed in the ES. We consider significant effects upon the setting of the AONB to be unlikely. Two viewpoints presented in the report (VP5/02 and VP5/03) would place the development intervisible with the Snowdonia skyline, but behind the existing overhead line. Some intensification of development would be likely within the view. Without wire frame/ photomontage images however it is not possible to be certain of the likely effects here and this will need to be clarified in the ES. | NRW 2.18 | Wireframe illustrations are presented alongside the viewpoint photographs within Appendix 8.2, Viewpoint Assessment (Document 5.8.2.2) Photomontages from selected viewpoints are presented in Document 5.29 . |
| | Section E - The PEIR notes that the proposal might have effects on the wider setting of Snowdonia National Park. We note that VP5/12 has a particularly striking view of Snowdonia, but other views captured by the PEIR do not place the development intervisible with Snowdonia. | NRW 2.19 | This comment is noted. |
| | Section F - The tunnel routing below the Menai Strait to avoid effects upon the AONB and distinctiveness and sense of place of the locality is a very positive approach to conserving the integrity of nationally important natural and cultural landscapes of the development area. The location of the sealing end compounds, tunnel head buildings and construction compounds seeks to locate above ground infrastructure and construction activity beyond the visual setting of the Menai Strait. NRW agrees with this sensitive integration of development. | NRW 2.20 | This comment is noted. |
| | Photomontage viewpoint V (VP6/16) illustrates the proposed overhead line section to the Pentir substation intervisible with the Snowdonia skyline. Other photo views in this area have been included in the PEIR, but photos so far not provided. Further information is needed here to understand the number and spatial distribution of views that could be affected, to then provide a full understanding of effects upon the setting of Snowdonia. | NRW 2.21 | Wireframe illustrations are presented alongside the viewpoint photographs within Appendix 8.2, Viewpoint Assessment (Document 5.8.2.2) Photomontages from selected viewpoints are presented in Document 5.29 . The assessment effects on landscape designations are reported in Chapter 7 Landscape Assessment (Document 5.7). This includes assessment of effects on the Snowdonia National Park and its setting. |

| Table 3: Natural Resources Wales | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| 6 <i>Proposed Mitigation and Residual Effects</i> | Chapter 6, Section 5 refers to the steps for mitigating development effects and refers to National Planning Statement (NPS). We note the National Grid are currently developing the secondary mitigation proposals. To help integrate the proposed development within the setting of designated landscapes NRW advise that strengthening the baseline pattern of hedgerows, trees and woodland presents the best opportunity for landscape integration of the development and realising additional opportunities for habitat diversity and connectivity. | NRW 2.22 | <p>Mitigation in the form of reinstatement is included within the CEMP (Document 7.4) and shown on Figure 1 Reinstatement Plans (Document 7.4.1.1).</p> <p>Figures 7.12-7.16 Landscape Mitigation Proposals (Document 5.7.1.12-5.7.1.16) present more detailed information on specification of proposed mitigation planting.</p> <p>These embedded mitigation measures have been assessed as part of the Proposed Development and include for example, planting around the CSEC/THH, in-situ planting such as replacement of hedgerows and boundaries post construction and tree replacement and planting, all within the Order Limits.</p> <p>Secondary measures fall under the umbrella of 'enhancement' as these cannot be guaranteed. Enhancement measures have been considered separately to the EIA as these would be undertaken by voluntary agreement; such measures include consideration of wider landscape enhancement e.g. restoration of boundaries such as cloddiau that are not directly affected by the Proposed Development and planting of trees and woodland in the wider landscape. In addition, planting would be offered to residential receptors in the form of a Voluntary Residential Planting Scheme (VRPS). This would include the offer of planting to reduce/ minimise visual effects for eligible properties identified during the assessment.</p> <p>Enhancement measures along with the VRPS are presented in the Enhancement Strategy (Document 7.13).</p> |
| | We advise that the ES needs to make clear how specific areas will be targeted to help strengthen the landscape setting of the designated landscapes where development effects have been | NRW 2.23 | As no significant socio-economic effects are identified for the Proposed Development, no |

| Table 3: Natural Resources Wales | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | assessed. We are aware of the issues with implementing planting on land not in the control of the developer. A landscape strategy approach to target priority areas of work; a means by which land owners are engaged and encouraged to participate; a funding mechanism to allow land owners to implement planting and long term management; and long term post development support and monitoring, are all essential to realise and secure the essential mitigation requirements of the scheme. | | mitigation is proposed. No enhancement measures are described in Chapter 17 Socio Economics. Proposed enhancement measures are documented in the Enhancement Strategy (Document 7.13). |
| <i>7 Cumulative Effects</i> | Chapter 6, Section 7 identifies that the potential Inter-Project Cumulative Effects includes Rhyd-y-Groes Wind Farm. The submission needs to include details of the 2016 planning consent given for repowering the current development, which replaces the current scheme with taller structures and a different site layout. | NRW 2.24 | A full list of projects identified for the cumulative assessment can be found in Chapter 20, Inter-Project Effects (Document 5.20). The assessment of cumulative effects is presented in Section 10 of Chapter 7, Landscape Assessment (Document 5.7) and Chapter 8, Visual Assessment (Document 5.8). |
| Chapter 7 Visual Assessment | Much of the landscape contextual information and Preliminary Appraisal of Potential Effects have been presented in outline within chapter 7 and more comprehensively within Chapter 6. There is a need to ensure that the final visual assessment of effects section of the report can be read as a standalone component without the need for cross reference to other chapters and reports. | NRW 2.25 | This comment is noted. A number of cross references have been included within Chapter 8, Visual Assessment (Document 5.8) so as not to duplicate information. |
| | The comprehensive range of viewpoints included within the assessment has covered the viewpoints relevant to our consideration of visual effects upon the Ynys Mon AONB and the Snowdonia National Park. | NRW 2.26 | This comment is noted. The viewpoint locations are presented in Appendix 8.2, Viewpoint Assessment (Document 5.8.2.2). |
| | Views of the Snowdonia Skyline from Anglesey are referred to in the submission. In places the view of Snowdonia will be an important local view for visual amenity, distinctiveness and sense of place and in others the view could place the development within what could be described as the setting of the designated area. We would welcome the final assessment clarifying/ differentiating between these two types of visual effect, as they have different planning policy implications. | NRW 2.27 | This comment is noted. The assessment of effects on landscape designations and their setting are reported in Chapter 7 Landscape Assessment (Document 5.7) and visual amenity discussed by community area/ receptor in Chapter 8, Visual Assessment (Document 5.8). |
| <i>8.1 Summary of preliminary</i> | We note that paragraph 8.1.9 identifies that the visual effects upon views from Mynydd Bodafon, located within the Ynys Mon AONB, could be significant but that further assessment is required | NRW 2.28 | This comment is noted. The assessment of effects on landscape designations and their setting are reported in Chapter 7 Landscape Assessment (Document 5.7) and visual amenity discussed by |

| Table 3: Natural Resources Wales | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| <i>anticipated visual effects</i> | here. We will comment further on any potential effects once we have been presented with the results of the further assessment. | | community area/ receptor in Chapter 8, Visual Assessment (Document 5.8). |
| <i>Viewpoint Figures</i> | PEIR Photomontages 2.4.5, figure 7.3 'Draft Photomontages' provide viewpoints A to X. We note that the photomontages include the note 'these are for illustrative purposes only'. We would wish for clarification as to why the photomontages are for illustrative purposes only or wish for the note to be removed as it suggests that the photomontages are not to be used for the purposes of reviewing the visual effects of the proposed project. | NRW 2.39 | Photomontages from selected viewpoints are presented in Document 5.29 . These photomontages illustrate the Proposed Development as shown on the Works Plans (Document 4.4) and in the Indicative Pylon Schedule in Appendix 3.1 (Document 5.3.2.1). As there is an element of flexibility in the design, as discussed in Chapter 6, EIA Methodology (Document 5.6), the photomontages can only ever be illustrative and have informed but have not been the basis of the assessment presented in Chapter 8, Visual (Document 5.8) |
| 2 Ecology and Nature Conservation | | | |
| Protected Sites | | | |
| <i>Habitat Regulation Assessment (HRA)</i> | As the proposal has possible implications for Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites, the Secretary of State (SoS) will need to carry out a test of likely significant effects (either alone or in-combination) under Regulation 61 of the Conservation of Habitats and Species Regulations 2010 (as amended) before determining the Order. If that assessment concludes there is likely to be a significant effect, we can advise on the further, appropriate assessment that would be required under the Regulations. | NRW 3.1 | This comment is noted. |
| | To support the assessment under the Conservation of Habitats and Species Regulations, the ES will need to identify all potential impact pathways for European protected sites and clearly assess the possible levels of impact. Where impacts are likely the submission needs to provide full details of the appropriate mitigation measures that are included to address the identified impacts. NRW can provide further advice with regard to predicted impacts or on the suitability of mitigation measures once full and detailed designs are available. | NRW 3.2 | This comment is noted and pre-submission discussions have been held with NRW since issue of the PEIR on the project level HRA, as reported in the Habitat Regulations Assessment Report (Document 5.23). Potential effects have been addressed within relevant chapters within the ES. The requirement to comply with the Habitats Regulations was identified at the commencement of the design process. This requirement has been taken into account during the design process and |

| Table 3: Natural Resources Wales | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | face to face engagement with stakeholders has been undertaken. The HRA is consistent with the ES and based on a review of all available survey data, more detailed desk study and assessment of potential pathways and mechanisms of the finalised design and construction information. |
| | We note that Chapter 8, paragraph 6.3.7 confirms that the ES will be supported by information to inform a HRA to an agreed scope with NRW in respect of the Corsydd Mon Special Area of Conservation (SAC) and where relevant other European Wildlife Sites. | NRW 3.3 | This comment is noted and pre-submission discussions held with NRW since issue of the PEIR as reported in the Habitat Regulations Assessment Report (Document 5.23), including the Corsydd Mon SAC. The requirement to comply with the Habitats Regulations was identified at the commencement of the design process. This requirement has been taken into account during the design process and face to face engagement with stakeholders has been undertaken. |
| | NRW advise National Grid to consult with NRW on the scope and preparation of the HRA report at the earliest convenience. | NRW 3.4 | This comment is noted and pre-submission discussions have been held with NRW since issue of the PEIR on the project level HRA. |
| <i>Potential Effects on Protected Sites</i> | Chapter 8. Table 8.9 – Table 8.14 ‘Designations located with potential zone of influence of the proposed project’ identifies the statutory protected sites within the study area. These sites include European sites (e.g. Special Areas of Conservation SAC), Special Protection Areas (SPA) and Ramsar sites) protected under the Conservation of Habitats and Species Regulations 2010 (as amended) and nationally protected sites (e.g. Sites of Special Scientific Interest (SSSI)) protected under the Wildlife and Countryside Act 1981 (as amended). | NRW 3.4 | This comment is noted. |
| | As the PEIR does not include full design plans and complete surveys at this stage of the consultation, we are not able to determine whether the project is likely to have a significant effect on SAC features, alone or in combination with other plans or projects, or be likely to damage SSSI features. | NRW 3.5 | This comment is noted. Full details are provided within the ES. Potential effects have been addressed within Chapter 9, Ecology and Nature Conservation (Document 5.9). The ecology survey results can be found within Appendices 9.3 onwards (Documents 5.9.2.3 onwards). |
| | As already identified, the ES needs to identify all possible impact pathways for protected sites, clearly assess the possible levels of impact and, where impacts are likely, detail appropriate mitigation measures for avoiding or reducing impacts on all protected sites. Where damage to the | NRW 3.6 | This comment is noted and the approach taken to identifying possible impact pathways detailed |

| Table 3: Natural Resources Wales | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | site features cannot be avoided, the ES should demonstrate how all alternatives have been fully considered. Where damage to the protected site is considered likely despite full consideration of avoidance and mitigation measures, the ES should specify possible compensation measures (including measures to ensure long-term site security and management) in order to offset the damage. The implications of conclusions will depend on whether affected features are SAC features or only SSSI features. | | within the Habitat Regulations Assessment Report (Document 5.23). |
| | We note that Chapter 8, Table 8.1 'Issues and Responses to the SoS Scoping Opinion' confirms that as the Glynllifon SAC lies approximately 11.2 km from the southern point of the scoping corridor which has since been reduced, the site lies outside the 10km study area and therefore considered appropriate not to include this in the ES. NRW agrees with this approach. | NRW 3.7 | This comment is noted and welcomed. |
| | Chapter 8, Table 8.19 – Table 8.25 'Preliminary Ecological Effects' identifies the potential effects in each section of the project areas. The ES needs to include a full assessment of Ecological Effects. | NRW 3.8 | The section by section approach in the PEIR was intended to help stakeholders identify where the scheme may be relevant to them. Such an approach has been shown to be useful on other schemes. The assessment presented in the ES has been written to show both local and overall project-wide effects, without splitting it into sections. |
| | Chapter 8, Table 8.30 'Preliminary Mitigation and Residual Effect for all Sections A to F and other infrastructure components located within the sections' identifies the preliminary mitigation and residual effects for the project areas. The ES needs to include full details of the proposed mitigation proposals and residual effects. | NRW 3.9 | This comment is noted. The ES includes detailed assessments of likely impacts, proposed mitigation and resulting residual effects within Chapter 9 Ecology and Nature Conservation (Document 5.9). Full details can be found within the Biodiversity Mitigation Strategy (BMS) (Document 7.7). |
| <i>Llyn Alaw SSSI</i> | Llyn Alaw SSSI is located approximately 400m west of the Proposed Project Boundary (PPB). The bird features of Llyn Alaw SSSI are breeding Shoveler and non-breeding Teal. Llyn Alaw also has large number of wintering waterfowl on it including geese and swans. Overhead wires are known to pose a risk to large birds through increasing the risk of collision and increased provision of hunting lookouts and/or nesting sites on new pylons. | NRW 3.10 | This comment is noted. The bird survey programme has covered Llyn Alaw and the risk of collision with overhead wires considered in the ES Chapter 9, Ecology and Nature Conservation (Document 5.9). |
| | We note that PEIR Figure 8.8 includes details of the vantage points selected for the bird surveys. We advised in our Scoping Response that we wished to have the opportunity to review the site selection for vantage points to give the best chance of obtaining sufficient information needed to inform assessment and decision. We confirm that we have not been provided with the opportunity | NRW 3.11 | The vantage point (VP) locations were circulated prior to the NRW for comment prior to the bird surveys being undertaken. VP locations in the ES have been designed to provide comprehensive |

| Table 3: Natural Resources Wales | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | to review the selected vantage points to date and also note that the PEIR does not include the bird survey results undertaken to date. | | coverage based on sight lines and where access was permitted. The PEIR did not include full bird survey results as these remained ongoing at the time of writing the PEIR. In order to keep the PEIR of a manageable size for stakeholders only summary results were included. An analysis of the full survey programme is included in the ES Chapter 9 Appendix 9.15 Ornithological Assessment Report (Document 5.9.2.15). |
| | PEIR Appendix 8.1 'Survey Methodologies', paragraphs 1.1.41 – 1.1.59 details of the on-going bird surveys. We note that surveys have been undertaken between the periods of October 2015 and March 2016 (wintering) and April 2016 to July 2016 (breeding) and where access was not possible or where weather conditions affected the duration of surveys, further surveys will be undertaken in the winter of 2016/17. | NRW 3.12 | This comment is noted. A further full season of wintering bird surveys was undertaken between October 2016 and March 2017. |
| | Chapter 8, Table 8.18 'Nature Conservation Value and Potential Ecological Effects for Ornithological Receptors' identifies several possible effects on the site features of the Llyn Alaw SSSI including effects from disturbance, displacement, loss of wintering bird foraging and roosting habitat and risk of direct impact through collision with OHL and supporting structures. | NRW 3.13 | This comment is noted. |
| | We note that Table 8.18 includes details of potential mitigation. As we have not been able to review the bird survey results undertaken to date we are not able to comment on the mitigation proposals included but note that the mitigation proposals include the installation of anti-perching and anti-collision devices on pylons and conductors to prevent bird strikes and increases in predation from raptor species. | NRW 3.14 | This comment is noted. |
| | We would also expect the ES to include an assessment of the impact of the existing pylons and lines on the birds that are a feature of the Llyn Alaw SSSI. This will also inform the assessment of the suitability of the proposed mitigation proposals. | NRW 3.15 | This comment is noted. The bird survey programme has covered Llyn Alaw and the risk of collision with overhead wires considered in the ES chapter 9, Ecology and Nature Conservation (Document 5.9). Details are provided about collisions observed during the VP surveys. |
| | We will comment further on the likely effects on features of the Llyn Alaw SSSI including mitigation proposals once we have been presented with the full suite of bird surveys. Until then we cannot confirm if the mitigation proposals are satisfactory and that the project will avoid any detrimental impacts on the features of the Llyn Alaw SSSI. | NRW 3.16 | This comment is noted. |

| Table 3: Natural Resources Wales | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| <i>Corsydd Mon SAC, Corsydd Mon a Llyn Ramsar and Cors Erddreiniog SSSI</i> | PEIR Figure 3.1 'Proposed Project Boundary' identifies that the proposed project boundary includes areas within the Corsydd Mon SAC, Corsydd Mon Ramsar and Cors Erddreiniog SSSI protected site areas. | NRW 3.17 | This comment is noted. The proposed project boundary (PPB) shown in the PEIR was the corridor within which works were shown to occur at that time and has since been amended to form the Order Limits used for the ES following detailed design. Any likely significant effects on these sites are discussed in ES Chapter 9 Ecology and Nature Conservation (Document 5.9) and the HRA Report (Document 5.23) |
| | PEIR Plans 3.11 identifies that the proposals within the protected site areas are to include drainage mitigation area. We cannot see that the submission includes any further details with regard to the drainage proposals. We also note that Chapter 8, Table 8.21 confirms that the project includes a temporary loss of a small area of habitat on the western boundary of the designated site. The ES needs to include full details of any loss of habitat within the protected site boundary to allow an assessment of impact on the site features. | NRW 3.18 | Within these areas only drainage works are permitted, which has been secured within the Schedule of Environmental Commitments (Document 7.4.2.1). Please also refer to section 8.5 of the CEMP (Document 7.4). This comment is noted and the ES is based on drainage mitigation that would ensure no detriment to the designated sites. The ES also shows less habitat affected than was potentially the case suggested within the PEIR, and is limited to areas that do not include qualifying habitats. |
| | Chapter 8, Table 8.21 also identifies that the project has the potential to result in hydrological alteration of habitats associated with the designations as watercourses, drains and ponds are scattered throughout the PPB. We note that the mitigation proposal includes the requirement of carefully designed drainage plans to prevent construction/ maintenance/ decommission works affecting aquatic habitats including watercourses/ ponds and fenland associated with designated sites. | NRW 3.19 | This comment is noted. |
| | We are not able to confirm whether the proposed works will have an impact on the features of the protected sites at this stage or confirm whether the mitigation proposals are satisfactory to avoid/minimise any impact as we have not been provided with enough information to assess the potential impacts. | NRW 3.20 | This comment is noted and the ES is based on a drainage mitigation that is not detrimental to the designated sites. The ES also shows less habitat affected than was potentially the case suggested within the PEIR, and is limited to areas that do not include qualifying habitats. This is protected as part of the Schedule of Environmental Commitments (Document 7.4.2.1). |

| Table 3: Natural Resources Wales | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | Please refer to the CEMP (Document 7.4) for details of drainage mitigation. |
| | We expect the ES to include full details of the drainage proposals including full description of the discharge types as well as full details of any proposed mitigation proposals. This will allow us to comment on whether the mitigation proposals are satisfactory and that the project will avoid any impacts on the SSSI/SAC/Ramsar site. | NRW 3.21 | <p>This comment is noted and the ES is based on a drainage mitigation that is not detrimental to the designated sites. The ES also shows less habitat affected than was potentially the case suggested within the PEIR, and is limited to areas that do not include qualifying habitats. This is protected as part of the Schedule of Environmental Commitments (Document 7.4.2.1).</p> <p>Please refer to the CEMP (Document 7.4) for details of drainage mitigation</p> |
| <i>Caeau Talwrn SSSI, Part of Corsydd Mon SAC</i> | PEIR Figure 3.1 'Proposed Project Boundary' identifies that the proposed project boundary includes areas within the Caeau Talwrn SSSI also part of the Corsydd Mon SAC. | NRW 3.22 | This comment is noted. The proposed project boundary (PPB) shown in the PEIR was the corridor within which works were shown to occur at that time and has since been amended to form the Order Limits used for the ES following detailed design. Any likely significant effects on these sites are discussed in ES Chapter 9 Ecology and Nature Conservation (Document 5.9) and the HRA Report (Document 5.23) |
| | PEIR Plans 3.11 identifies that the proposals within the protected site areas are to include drainage mitigation area. We cannot see that the submission includes any further details with regard to drainage proposals although Chapter 8, Table 8.22 confirms that the project includes a temporary loss of a small area of habitat within the designated sites. | NRW 3.23 | This comment is noted. The proposed project boundary (PPB) shown in the PEIR was the corridor within which works were shown to occur at that time and has since been amended to form the Order Limits used for the ES following detailed design. Any likely significant effects on these sites are discussed in ES Chapter 9 Ecology and Nature Conservation (Document 5.9) and the HRA Report (Document 5.23) |
| | However, as confirmed above for Cors Erddreiniog SSSI, although we note that table 8.18 includes mitigation proposals, until we are aware of the full details of the proposals including the drainage mitigation we cannot confirm if those mitigation proposals are satisfactory and that the project will avoid any impacts on the SSSI/SAC/Ramsar site. | NRW 3.24 | This comment is noted. The proposed project boundary (PPB) shown in the PEIR was the corridor within which works were shown to occur at that time and has since been amended to form the |

| Table 3: Natural Resources Wales | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | Order Limits used for the ES following detailed design. Any likely significant effects on these sites are discussed in ES Chapter 9 Ecology and Nature Conservation (Document 5.9) and the HRA Report (Document 5.23) |
| <i>Tre Gof SSSI, Llyn Hafodol and Cors Glegyrog SSSI</i> | Chapter 8, Table 8.19 also identifies that the project has the potential to result in the hydrological alteration of habitats associated with the Tre Gof SSSI and Llyn Hafodol and Cors Glegyrog SSSI as watercourses, drains and ponds are scattered throughout the PPB. We note that the mitigation includes the requirement of carefully designed drainage plans to prevent construction/ maintenance/ decommission works affecting aquatic habitats including watercourses/ ponds and fenland associated with designated sites. | NRW 3.25 | <p>This comment is noted and the ES is based on details of the proposals, effects on hydrology, mitigation and resulting residual effects. Full details of the mitigation can be found within the Schedule of Mitigation (Document 5.28) and BMS (Document 7.7).</p> <p>Please refer to the Drainage Management section of the CEMP (Document 7.4) for drainage mitigation.</p> |
| | We note the mitigation included in Chapter 8, Table 8.19, however until we are aware of the full details of the proposals we cannot confirm that the mitigation proposals are satisfactory and that the project will avoid any impacts on the SSSI/SAC/Ramsar site. | NRW 3.26 | <p>This comment is noted. Pre-submission discussions have been held with NRW since issue of the PEIR on protected sites. The requirement to comply with the Habitats Regulations was identified at the commencement of the design process. This requirement has been taken into account during the design process and face to face engagement with stakeholders has been undertaken. The ES is based on details of the proposals, their impacts, mitigation and resulting residual effects. Full details of the mitigation can be found within the Schedule of Mitigation (Document 5.28) and BMS (Document 7.7).</p> <p>Please refer to the Drainage Management section of the CEMP (Document 7.4) for drainage mitigation.</p> |
| Protected Species | | | |

| Table 3: Natural Resources Wales | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| <i>European Protected Species Licence</i> | <p>Where a European Protected Species is likely to be affected, a development may only proceed under licence issued by NRW having satisfied the derogation provisions of Article 16 of the Habitats Directive. The relevant Article 16 derogation in respect of development is:</p> <ul style="list-style-type: none"> - <i>Evidencing an appropriate derogation purpose</i> - <i>Demonstrating no satisfactory alternatives;</i> - <i>Demonstrating no likely detriment to the maintenance of the favourable conservation status of each local population of EPS</i> | NRW 3.27 | This comment is noted. |
| | We are satisfied that a single licence application will be submitted for the entire scheme (construction phase) for each individual species concerned which will cover all of the identified impacts on protected species as well as applying the 'precautionary approach' within other areas of the work. | NRW 3.28 | This comment is noted and welcomed. |
| | As previously discussed, for the maintenance work required thereafter, we recommend the submission of an all Wales licence applications for 'standard' maintenance works. | NRW 3.29 | This comment is noted. |
| | We can discuss the all Wales licence to cover the maintenance works directly with National Grid when convenient. | NRW 3.30 | This comment is noted. |
| <i>Likely effects on protected species</i> | Bats, great crested newts (GCNs) and otters are European Protected Species (EPS) protected under the Conservation of Habitats and Species Regulations 2010 (as amended) and the Wildlife and Countryside Act 1981 (as amended). Water voles, red squirrels, and Schedule 1 listed birds are protected under the Wildlife and Countryside Act 1981 (as amended). | NRW 3.31 | This comment is noted and has been included within the ES Chapter 9 Ecology and Nature Conservation (Document 5.9). |
| | We note that the PEIR Chapter 8 confirms that the study area for the field surveys has generally included land within the PPB and a 50m buffer from the PPB boundary. We note the survey timings confirmed in Table 8.8 and acknowledge the surveys that are on-going. We are satisfied with the survey proposals set out in PEIR Chapter 8 in respect of protected species including details of both the completed and on-going surveys | NRW 3.32 | This comment is noted and welcomed. |
| | We would expect the submission to give consideration to both the current conservation status (CCS) and favourable conservation status (FCS) for each population(s) of European Protected Species as part of the assessment process. | NRW 3.33 | This comment is noted and has been included within the ES Chapter 9 Ecology and Nature Conservation (Document 5.9). |
| | We have reviewed table 8.30 'Preliminary mitigation and residual effects for all sections A to F and other infrastructure components located within the sections' and note that the mitigation identified are only preliminary as full survey results are not available at this stage in the consultation process. | NRW 3.34 | The ES includes full survey results as Appendices to Chapter 9 Ecology and Nature Conservation (Documents 5.9.2). The ES chapter summarises |

| Table 3: Natural Resources Wales | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | We note that additional mitigation measures will be identified in detail in the ES and will be based on the full suite of environmental baseline information including full survey results. | | these results along with the stated effects, mitigation and residual effects. Further details of the mitigation can be found within the Schedule of Mitigation (Document 5.28) and BMS (Document 7.7). |
| | We advise that the ES provided as part of the DCO submission should clearly set out likely effects on protected species and, where potential for adverse effects are identified, should propose and deliver appropriate mitigation and/or compensation schemes to ensure the Favourable Conservation Status of the affected species is maintained. We advise that you consult NRW on the proposed mitigation and/or compensation measures in advance of DCO submission, and allow sufficient time for NRW to advise appropriately. | NRW 3.34 | The ES Chapter 9 Ecology and Nature Conservation (Documents 5.9) sets out the stated effects, mitigation and residual effects for protected species. Further details of the mitigation can be found within the Schedule of Mitigation (Document 5.28) and BMS (Document 7.7). |
| | We note that Chapter 8, paragraph 6.1.3 identifies that the pylons and other structure locations have been situated away from ecological features where possible and where this has not been possible, and pylons are within close proximity to important ecological features, where practicable, these structures will be micro-sited (re-positioned) during detailed design to avoid or minimise impacts to important features. | NRW 3.35 | The design process has taken potential effects on receptors into account and used mitigation through avoidance where possible. The ES chapter sets out the stated effects, mitigation and residual effects for protected species. |
| | We note that Chapter 8, paragraph 6.3.2 notes that the mitigation measures will be developed in consultation with relevant statutory nature conservation advisors including ourselves. | NRW 3.36 | Noted. |
| | As previously advised, we recommend National Grid work with Horizon when developing mitigation proposals to ensure that they are maximised and do not conflict. | NRW 3.37 | Liaison has been on-going with Horizon. This has included data exchange and discussions on combined mitigation. |
| <i>Available Data to inform assessment</i> | We recommend National Grid liaise with Horizon with regards to available data to inform assessment of potential impact of the development on protected species. | NRW 3.38 | Liaison has been on-going with Horizon. This has included data exchange and discussions on combined mitigation. |
| | We advise that all data is collated together to help inform overall assessment of impact | NRW 3.39 | This comment is noted. |
| | We also consider that data collected to inform the 'Rhiannon Wind Farm' proposals could be of benefit to inform both National Grid and Horizons' assessment of likely impacts of both projects on protected species. The contact details for the Crown Estate who own the data were provided. | NRW 3.40 | This comment is noted and such an approach discussed with NRW prior to the submission of the DCO. |
| <i>Great Crested Newt</i> | We note that PEIR Chapter 8 confirms that initial great crested newt (GCN) <i>Titurus cristatus</i> eDNA surveys have been undertaken in Spring 2015 where access was possible and all identified ponds, | NRW 3.41 | Initial eDNA surveys were undertaken in 2015 on ponds located within the selected orange route option, this was further narrowed down to the PPB |

| Table 3: Natural Resources Wales | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | present within the PPB and a buffer of 250m have been assessed for their potential to support great crested newts. | | at the time of the PIER and additional GCN surveys were undertaken on ponds within a 250 m buffer of the PPB when access permitted. The Proposed Development is now based on the Order Limits and has thereby been refined further, applying the 250 m buffer to the Order Limits. Details can be found within Appendix 9.6 Great Crested Newt Report (Document 5.9.2.6) of Chapter 9 Ecology and Nature Conservation (Documents 5.9). |
| | Chapter 8, Table 8.30 identifies that Sections A, B and C has the potential to impact on GCN as a result of direct habitat loss, risk of direct impact, severance and fragmentation. | NRW 3.42 | This comment is noted. Details can be found within Appendix 9.6 Great Crested Newt Report (Document 5.9.2.6) and Chapter 9 Ecology and Nature Conservation (Documents 5.9). |
| | The assessment of the projects' likely impacts on GCN should include an assessment of the current and favourable conservation status of the GCN population. | NRW 3.43 | This comment is noted. The approach adopted has been to design out impacts such there will be no direct loss of breeding habitat. Details can be found within Appendix 9.6 Great Crested Newt Report (Document 5.9.2.6) of Chapter 9 Ecology and Nature Conservation (Documents 5.9). |
| | <p>We advise that assessments need to be based on current survey information, together with any modelling data or conservation plans and would refer you to recent Defra guidance 'Developing models to estimate the occurrence in the English countryside of Great Crested Newts, a protected species under the Habitats Directive – WC1108'¹.</p> <p>¹ Dimitrios Bormpoudakis, Jim Foster, Tony Gent, Richard A. Griffiths, Liam Russell, Thomas Starnes, Joseph Tzanopoulos, John Wilkinson . (2016) . Developing models to estimate the occurrence in the English countryside of Great Crested Newts, a protected species under the Habitats Directive. Defra Project Code WC1108. http://randd.defra.gov.uk/Default.aspx?enu=Menu&Module=More&Location=None&Completed=0&ProjectID=19272</p> | NRW 3.44 | Modelling has not been undertaken, however a full assessment of potential effects is provided in ES Chapter 9 Ecology and Nature Conservation (Document 5.9) |
| | As detailed above, we advise that the Horizon, National Grid and 'Rhiannon' data is merged with extant data and models re-run. It is considered that this further modelling can then be used to inform the assessment of impact and mitigation proposals. | NRW 3.45 | Modelling has not been undertaken, however a full assessment of potential effects is provided in ES Chapter 9 Ecology and Nature Conservation (Document 5.9) |

| Table 3: Natural Resources Wales | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| <i>Ecological Compliance Audit</i> | We advise that the ES includes details of the scope of an Ecological Compliance Audit. The purpose of an Ecological Compliance Audit is to evidence compliant implementation of all ecological avoidance, mitigation and compensation works. This Audit shall include Key Performance Indicators (KPI's) that are to be used for the purposes of assessing compliance with proposed method statements, planning conditions and licence conditions. | NRW 3.46 | This comment is noted, however it is considered that the monitoring and auditing procedures set out in the CEMP (Document 7.4) and BMS (Document 7.7) would be sufficient to ensure compliance. |
| <i>Legislation Compliance Audit</i> | We advise that the ES includes a Legislation Compliance Audit which identifies how the project has considered all relevant legislation relating to Protected Species. | NRW 3.47 | The ES includes a Legislation Compliance Audit which identifies how the project has considered all relevant legislation relating to Protected Species, but is not restricted to ecological legislation. This document can be found in Legislation Compliance Audit (Document 5.28.2.1). |
| Biosecurity | We note that PEIR Appendix 4.2 Draft CEMP includes details of Biosecurity control at section 2.8. The details confirm that general techniques will be employed to avoid the spread of invasive non-native species (INNS) during construction. We acknowledge that the National Grid intend to provide further details with regards to Biosecurity Control within an INNS Method Statement which needs to be included within the ES. We advise that any subsequent biosecurity risk assessment also includes consideration for non-native flora, fauna and identified diseases e.g. Phytophthora, Chytrid Fungus and Chalara. This information is also required to inform the HRA. | NRW 3.48 | The ES includes an INNS Method Statement. This document can be found in the BMS (Document 7.7) and is included within/referred to where relevant in the HRA which can be found in the Habitat Regulations Assessment Report (Document 5.23). |
| 3 Geology, Hydrogeology and Groundwater Protection | | | |
| | Our comments below relate primarily to Chapter 10 of the PEIR. Although some of the comments NRW provided at the Scoping stage have been addressed, all remain relevant. | NRW 4.1 | Noted. |
| <i>Groundwater Protection</i> | We acknowledge that a contaminated land desk study of the area has been carried out and that an intrusive Site Investigation (SI) is proposed to take place in those areas where the possibility for contamination has been highlighted in the desk study. | NRW 4.2 | Noted. |
| | We agree that the proposed Site Investigations will follow the procedure set out in CLR11 and will be in line with BS 10175. The Guiding Principles for Land Contamination also provide useful guidance and are available on the gov.uk website at https://www.gov.uk/government/publications/managing-and-reducing-land-contamination | NRW 4.3 | Noted. |

| Table 3: Natural Resources Wales | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>The project needs to take into account the Environment Agency's Groundwater Protection: Principles and practice (GP3), which sets out NRW's position statements. Of particular relevance is position statement C5 - Pipelines and high voltage fluid filled cables in GP3 of our Groundwater Protection Policy. We understand that it is unlikely that fluid filled cables would be used although the PEIR does not specifically rule the use of these out. Position Statement C5 highlights our position with regards to the use of such pipes and cables, that being that we would normally object to fluid filled cables that pass through Source Protection Zones 1 and 2, or alternatively, where fluid filled cables are placed below the water table. The position statement is available at:</p> <p>https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/297347/LIT_7660_9a3742.pdf</p> | NRW 4.4 | Fluid filled cables would not be used within the tunnel route. Instead cross linked polyethylene (XLPE) single core cables would be laid within the air filled tunnel as described within Chapter 3, Description of the Proposed Development (Document 5.3) . |
| | GP3 also contains general pollution prevention advice for protection of groundwater, which will be of relevance to this project. | NRW 4.5 | Noted. |
| | The statement made in Chapter 10, Table 10.1, Section 3.96, states that SPZs are not applicable in Wales. This statement is incorrect and needs to be amended. Source Protection Zones are defined areas of protection around a point of abstraction of water, and they are fully applicable in Wales. For information, a generic 50m Source Protection Zone (SPZ1) is assumed and operated around all private groundwater abstractions. Any Source Protection Zones that are intercepted by the proposed development should be included in the assessment. | NRW 4.6 | A generic 50 m SPZ has been considered within the risk assessment for private groundwater abstractions. The outcome of this assessment is summarised within section 9 mitigation and residual effects of Chapter 11, Geology, Hydrogeology and Ground Conditions (Document 5.11) . |
| | With regards to Chapter 10, Table 10.2, consideration should be given to other important ecological sites that are supported by groundwater. We have previously noted that wetlands are identified along the proposed corridor. However, there is an assumption that these are only surface water dependent. Wetlands that constitute groundwater dependent terrestrial ecosystems (GWDTE) should be identified along with their status, e.g. SAC, SSSI, etc. For example, the Tre Gof wetland is not purely surface water fed. Recent investigations by Horizon in connection with the proposed new power station indicate that an element of groundwater flow is involved. | NRW 4.7 | <p>Information about groundwater dependent terrestrial ecosystems, and any potential effects upon them posed by the Proposed Development, are included in section 7 baseline conditions and section 9 mitigation and residual effects of Chapter 11, Geology, Hydrogeology and Ground Conditions (Document 5.11).</p> <p>Further details are also provided in Chapter 9, Ecology & Nature Conservation (Document 5.9) and Chapter 12, Water Quality, Resources And Flood Risk (Document 5.12).</p> |
| | We advise that Table 10.2 of Chapter 10 needs to include reference to private water supplies and to identify any as being of high sensitivity. A single private water supply could be an important receptor if it is the only source of water for a property. We note that the risks to 'private water | NRW 4.8 | Private water supplies are identified within section 7 baseline conditions of Chapter 11, Geology, Hydrogeology and Ground Conditions (Document |

| Table 3: Natural Resources Wales | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | supplies is still being assessed'. We are therefore not in a position to comment further on this at present and wish for a full assessment of potential effects on private water supplies to be included in the ES. | | 5.11). The Private Water Supply Risk Assessment, including the methodology used to gather data regarding private abstractions, is included within Appendix 11.6 (Document 5.11.2.6). |
| | The magnitude of the example of 'partial loss' of the integrity of groundwater supported designated wetlands is tabled in Chapter 10, Table 10.3 as being of "Medium" magnitude. We consider that the magnitude should be 'High' within a site of European importance. | NRW 4.9 | Table 11.4 of Chapter 11, Geology, Hydrogeology and Ground Conditions (Document 5.11) has been updated. |
| | Any reduction of status in a Groundwater Body under the WFD (on any of the tests) also needs to be considered as being of 'High' magnitude. | NRW 4.10 | Table 11.4 of Chapter 11, Geology, Hydrogeology and Ground Conditions (Document 5.11) has been updated. |
| | Chapter 10, Table 10.5 defines the different classifications of significance of ground contamination within the context of Part 2A. However, it fails to include significant pollution or significant possibility of significant pollution of controlled waters. The table needs to be amended to address this omission as currently the emphasis is on human health, crops, ecosystems, soils and geology, but not controlled waters themselves. | NRW 4.11 | The classifications of significance within the context of EPA Part 2A as discussed under section 4 methodology of Chapter 11, Geology, Hydrogeology and Ground Conditions (Document 5.11), which includes pollution to controlled waters. |
| | The significance of loss of existing groundwater supplies, both public and private, should be considered. | NRW 4.12 | The loss of or adverse effect upon groundwater abstractions is considered under section 8 potential effects of Chapter 11, Geology, Hydrogeology and Ground Conditions (Document 5.11). |
| | Any damage to a designated site of European importance would be considered 'major adverse'. | NRW 4.13 | The loss of or adverse effect upon groundwater abstractions is considered under Section 8 of Chapter 11, Geology, Hydrogeology and Ground Conditions (Document 5.11). |
| | Dewatering is proposed as being necessary during the development. As advised at the Scoping stage, the operator will be aware that there is currently an exemption in place from the requirement to hold a permit for dewatering. However, the operator should note that the Welsh Government is proposing to remove this exemption early in 2017, although it is possible that some exclusions will apply for some construction activities. | NRW 4.14 | Noted. |
| | Piling is proposed in certain areas of the project. Depending on the extent and geological context a Foundation Works Risk Assessment to protect groundwater may be required if the piling is through contaminated ground. Further advice on piling operations is provided on page 191 of the | NRW 4.15 | The potential effects of piling works are discussed under section 8 potential effects of Chapter 11, Geology, Hydrogeology and Ground Conditions |

| Table 3: Natural Resources Wales | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | Environment Agency's Groundwater Protection: Principles and practice GP3 and should be referred to https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/297347/LIT_7660_9a3742.pdf | | (Document 5.11) . Mitigation strategies are discussed under section 9 mitigation and residual effects of Chapter 11, Geology, Hydrogeology and Ground Conditions (Document 5.11) . |
| | Chapter 10, Section 4.2.19 refers to Public Wells. We are not sure what type of wells this section refers to and we do not consider that it is sufficient to state that 'further details regarding use, abstraction volumes and nature of sources of these wells are unknown'. We advise that an assessment of the risks from the proposed development for these supplies should be undertaken. | NRW 4.16 | Private water supplies are discussed under section 7 baseline conditions of Chapter 11, Geology, Hydrogeology and Ground Conditions (Document 5.11) . The Private Water Supply Risk Assessment including the methodology used to gather data regarding private abstractions (which includes Public Wells) is included within Appendix 11.6 (Document 5.11.2.6) . |
| | We welcome the mitigation measures proposed in Section 6.3. We may also require additional monitoring of sensitive ecological sites and public water supplies following review of the ES. If identified as being at risk, we will need to see consideration (including monitoring) of groundwater levels at water features, not just water quality. | NRW 4.17 | Noted. |
| <i>Sites of Geological Importance</i> | We confirm that there are no geological SSSI or RIGS within the PPB as presented in the PEIR. | NRW 4.18 | Noted. |
| | We are aware of the proposals for Ground Investigation Studies of the proposed tunnel to inform the project design and consider that undertaking horizontal drilling to get a core above the route of the proposed tunnel will give a continuous section through the bedrock and be less invasive for the Menai Straits than a series of bore holes on the sea bed. | NRW 4.19 | Horizontal drilling is not considered necessary. |
| | We would suggest that the core be deposited in the National Geological Repository with the British Geological Survey as we consider that the core across the strait may well be unique and invaluable for geological research in the area. | NRW 4.20 | Borehole logs and, if requested, drilling cores from ground investigation works would be provided to the British Geological Survey (BGS). In particular this will provide greater information about the geology of the Menai Strait. This is set out in the Enhancement Strategy (Document 7.13) . |
| 4 Water Quality, Resources and Flood risk | | | |

| Table 3: Natural Resources Wales | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| <i>Water Quality</i> | There is a need to ensure that the project does not have a detrimental impact on water quality. In particular we would advise that any topsoil stripping will need to be managed effectively. The ES and CEMP will need to include a robust strategy to control run off. | NRW 5.1 | Measures in Table 12.20 are set out in the CEMP (Document 7.4), which is secured by DCO Requirement 6. These have been prescribed to ensure that the Proposed Development does not significantly impact upon water quality. |
| | Under Water Quality Assessment 7.1: There is a need to ensure that the project does not have a detrimental impact on water quality. In particular, we would advise that any topsoil stripping will need to be managed effectively. The ES and CEMP will need to include a robust strategy to control run off. Additionally 7.3: A comprehensive and site specific CEMP will be required in support of the ES and address all relevant environmental issues. Details shall include strategies relating to the management of soil. | NRW 5.2 | See comment above. The CEMP (Document 7.4) is secured by DCO Requirement 6, and includes the management of soil. |
| | In relation to water course crossings, NRW expect the work to follow best practice to ensure water quality and WFD status is unaffected. | NRW 5.3 | Measures set out in the CEMP (Document 7.4) which is secured by DCO Requirement 6, follow best practice and also require that Flood Risk Activities Permits or OWCs would be obtained for all watercourse crossings. The CEMP also sets out that construction method statements would be required for works including bridges and culverting works. |
| | Haul roads for access need to be designed and engineered effectively to ensure that they do not deteriorate during construction and contribute to run off, particularly in wet areas. Again the ES and CEMP will need to include full details of the design and construction methods. | NRW 5.4 | The CEMP (Document 7.4) provides measures which are secured through Requirement 6 of the DCO. Measures are included that would ensure runoff does not contribute towards track deterioration, and the creation of preferential flowpaths. The key requirements for drainage throughout the Order Limits are discussed in FCA Volume 4 (Document 5.12.2.4) and in the CEMP (Document 7.4). The CEMP also requires the preparation and submission of a Drainage Management Plan to NRW, which would build upon this drainage information. The Drainage Management Plan would be secured through DCO Requirement 7. |

| Table 3: Natural Resources Wales | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | We can comment further on any potential effects on water quality once we have been provided with the full project details. | NRW 5.5 | Noted. |
| <i>Flood Risk</i> | With regard to Flood Risk, we have referred to the relevant sections in Chapter 11. | NRW 5.6 | Noted. |
| | We acknowledge that a drainage assessment will be provided for the tunnel heads due to the impermeable areas. The run-off rates should mimic those of existing rates and where applicable reflect green-field rates/volumes. The use of sustainable drainage principles should be adopted in the design. | NRW 5.7 | <p>The CEMP (Document 9), which is secured by DCO Requirement 6, requires the preparation and submission of a Drainage Management Plan to NRW, which would build on this drainage information. The Drainage Management Plan would be secured through DCO Requirement 7.</p> <p>Drainage information for each of the Construction and Operational Compounds at Braint and Tŷ Fodol has been provided in Appendix 12.3 (Document 5.12.2.3), and for the Penmynydd Road and Pentir Construction Compounds in Appendix 12.4 (Document 5.12.2.4). The drainage information is based on discharges to greenfield rates that are in accordance with sustainable drainage principles set out in the sustainable drainage systems (SuDS) Manual. This is covered in the FCA Appendix 1, Section 5.5 (Document 5.12.2.1), and also in Appendix 12.3, Section 2.6 (Document 5.12.2.3).</p> |
| | We note the Secretary of State's comments in Chapter 11, Table 11.1, Section 3.113 regarding the drainage impact of the temporary aggregate-surfaced access roads and compounds and the 6 year construction period. We support the fact that the likely effects associated with the tracks is to be considered in the FCA and reported in the ES. We would expect that mitigation measures are proposed to negate any negative impact or increased drainage/flooding issues to third parties during the construction period and secured in the CEMP. | NRW 5.8 | The CEMP (Document 7.4) provides a set of robust control mitigation measures with the Water Environment and Flood Management Sections. The CEMP would be secured through DCO Requirement 6, and is summarised in Table 12.20 of this chapter. |
| | Chapter 11, Table 11.1, Section 3.117 relates to potential effects on reservoirs. With regard to flood risk, it is not expected that the route/pylons need to consider flooding from the Alaw and Cefni Reservoirs. | NRW 5.9 | The assessment of flood risk has not taken into account the risk of flooding from Llyn Alaw and Cefni reservoirs within the ES chapter (Document 5.12), as the risks from these sources were discounted in the FCA. |

| Table 3: Natural Resources Wales | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | With regard to Chapter 11, Table 11.2 we would advise that TAN15:Development and Flood risk (TAN15) and in particular Figure 2 of the TAN be referred to in the table. Please note that the table refers to land use types as defined in National Planning Policy Framework which is applicable to land use in England. The table needs to make reference to Planning Policy Wales and the Technical Advice Notes. | NRW 5.10 | TAN 15 zones have been referenced in the ES chapter (Document 5.12). Planning Policy Wales requirements have been followed throughout the assessment and within the FCA Documents. |
| | We would welcome clarification as to why paragraph 3.3.20 identifies that (bullet point on page 22); <i>'Sensitivity of people and property to flood risk downstream of the Proposed Project is assumed to be High. However, following the production of a FCA, this assumption will be clarified in the ES where a full assessment of effects on flood risk receptors will be presented'</i> . It should be recognised and made clear that both upstream and downstream flood risk should be assessed. | NRW 5.11 | It is recognised that both upstream and downstream flood risk receptors are potentially at risk of flooding. The FCA and this chapter have assessed both upstream and downstream receptors in relation to the Proposed Development. |
| | Chapter 11, Section 4.2.4 refers to climate change. As advised at the Scoping stage, when considering climate change, we would advise that Welsh Government have published a policy clarification letter regarding the climate change allowances to be used for planning purposes which are applicable from 1st December 2016. The letter and guidance can be viewed at http://gov.wales/topics/planning/policy/policyclarificationletters/2016/cl-03-16-climate-change-allowances-for-planning-purposes/?lang=en | NRW 5.12 | In Document 5.12.1 the FCA has both taken into account Welsh Government guidance on Climate Change on FCERM and the referenced Policy clarification letter on Climate Change Allowances. |
| | With regard to the Development Advice maps defined in TAN15 and NRW's flood maps, generally only river catchments which are in excess of 3km ² have been modelled. Catchments smaller than 3km ² will have a degree of flood risk associated with them but have not been modelled by our generalised modelling technique to provide flood zone outlines (comments in para. 4.2.24 are noted). Flood zone 3 extent is equal or greater than 1% AEP for fluvial and 0.5% AEP for tidal. | NRW 5.13 | The baseline section of Document 5.12 has acknowledged these modelling limitations in Section 7.5, and this has also been taken into account in detail within the FCA. |
| | Although de-watering is referred to in Chapter 10, Table 11.8 under the 'Aquatic Environment & Water Resources' section, we would advise that this should also be included under the Flood Risk Section. De-watering can overload any receiving watercourses and lead to local flooding/drainage problems. | NRW 5.14 | Dewatering is considered within the assessment of effects for a range of fluvial and surface water flood risk receptors. It has also been taken account of in the FCA with respect to dewatering of excavations in Section 5.1 of Appendix 4 (Document 5.12.2.4) and the proposed tunnel shaft and tunnel in Section 1.3 of Appendix 12.3 (Document 5.12.2.3). |

| Table 3: Natural Resources Wales | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | Prior to undertaking the FCA for the project, we would welcome further dialogue with NRW with regards to the scope of such as assessment. | NRW 5.15 | A method statement for the FCA was issued to NRW and subsequently discussed to agree the scope. |
| <i>Flood Risk Activity Permit</i> | The PEIR confirms that the proposal will include the installation/removal of temporary bridges and culverts. As advised within our response to the Scoping document, such activities on a designated main river would require a Flood Risk Activity Permit under the Environmental Permitting (Amended) Regulations 2016 from NRW prior to commencement of works. Further information on FRAPs is available at: https://naturalresources.wales/apply-for-a-permit/flood-risk-activities/?lang=en . | NRW 5.16 | The requirement for a Flood Risk Activity Permit (FRAP) has been identified as part of FM25 within this chapter (Table 12.20) as set out in the CEMP (Document 7.4), which would be secured through DCO Requirement 6. |
| | These crossings should be able to pass the design flood event (1% AEP with allowance for climate change). | NRW 5.17 | As outlined in the FCA Document (Document 5.12.2.1-4), crossings will be designed to convey the 1% AEP plus allowance for fluvial crossings (+15 % for on flows for temporary crossings and +30% on flows for permanent crossings). |
| | The culverting of ordinary watercourses would be subject to a Flood Defence Consent under Section 23 of the Land Drainage Act 1991 from the Lead Local Flood Authority (Isle of Anglesey County Council or Gwynedd County Council). | NRW 5.18 | The requirement for Ordinary Watercourse Consent (OWC) has been identified as part of FM12 within Document 5.12 , as set out in the CEMP (Document 7.4), which would be secured through DCO Requirement 6. |
| <i>Water Framework Directive (WFD)</i> | Chapter 8, Section 6.3.6 identifies that the WFD Assessment will tie together the ecological assessment and water resources assessment aspects of the ES. In relation to WFD assessment, section 6.3.6 also identifies that reference is required to Chapter 11: Water Quality, Resources and Flood Risk. We would also note that the WFD Assessment will also need to take into account groundwater water bodies and reference also therefore required to Chapter 10 (Geology Hydrogeology and Ground Conditions). We would also advise that Chapter 10 should make reference to the WFD Assessment. | NRW 5.19 | The WFD assessment (Document 5.12.2.5) has taken account of groundwater bodies and is consistent with the Geology, Hydrogeology and Ground Conditions assessment (Document 5.11). |
| | We agree that the following groundwater water bodies identified require consideration; <i>GB41002G204400 Ynys Mon secondary</i> <i>GB41001G204200 Ynys Mon central carboniferous limestone</i> <i>GB41002G206100 Ynys Mon southern carboniferous limestone</i> | NRW 5.20 | The listed groundwater water bodies have been included in the WFD assessment (Document 5.12.2.5). |

| Table 3: Natural Resources Wales | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | We consider that the fourth, Anglesey groundwater body, GB41002G206200 Ynys Mon Eastern Carboniferous limestone is unlikely to relate to this scheme. | NRW 5.21 | The Ynys Mon Eastern carboniferous limestone groundwater body has not been assessed in the WFD assessment. |
| | Chapter 11, Table 11.2 confirms that ‘The definition of “relevant WFD elements” (given the lack of potential for the Proposed Project to influence these substances) excludes: Priority Hazardous Substances; Priority Substances; and Specific Pollutants’. | NRW 5.22 | See below. |
| | There is no rationale within the documentation for this decision. The statement appears to be inconsistent with the comment made in Chapter 11, Section 5.1.5 which states <i>“In addition, mobilisation of harmful substances from construction materials and from the operation of construction plant equipment (e.g. accidental spillage or leakage of fuel, hydraulic fluid) could also occur”</i> and elsewhere within Chapter 11, Table 11.20 Receptor Type - Aquatic Environment includes - Potential for accidental contamination associated with the spillage or leakage of fuels, lubricants and other chemicals. | NRW 5.23 | The ES chapter (Document 5.12) includes priority hazardous substances, priority substances and specific pollutants. As described in Section 2.3 of the chapter, these are constituent components used in the overall baseline classification of WFD water bodies. The substances are also included in the assessment of effects in Section 9 in the form of the potential for spillages of oils and chemicals from plant during construction. |
| | We advise that the ES needs to justify the exclusion of these substances or to include them. | NRW 5.24 | See above |
| | Chapter 11, Table 11.14 – There appears to be a transcription error from the Water Watch Wales dataset http://waterwatchwales.naturalresourceswales.gov.uk/en/ . Both water bodies included within this table should be identified as being of ‘Moderate’ value for ecological status and ‘Good’ value for chemical status. | NRW 5.25 | This transcription error has been amended and presented in Table 12.13 of Chapter 12 (Document 5.12). |
| | Chapter 11, Table 11.15 - A transcription error also appears within this Table. Ceint should be identified as being of ‘Moderate’ value for ecological status and ‘Good’ value for chemical status. | NRW 5.26 | This transcription error has been amended and presented in Table 12.13 of Chapter 12 (Document 5.12). |
| | Chapter 11, Table 11.25 – Nant y Garth Landfill Site – It is identified that the development area located to the South West of Bangor has the potential to result in cumulative effects on the “Unnamed to Menai Strait south WFD water body (GB110065058490)”. Please note that this waterbody has been renamed ‘Nant Y Garth waterbody’ (renamed in cycle 2). | NRW 5.27 | The Nant Y Garth water body has been referred to within Chapter 12 (Document 5.12) and the WFD assessment (Document 5.12.2.5) in accordance with WFD Cycle 2. |
| <i>Bathing waters</i> | The ES needs to add reference is made to bathing water quality. A major source of bathing water pollution is water draining from farmland and in particular from manure, livestock or poorly stored slurry washing into rivers and resulting in faecal material entering the sea. | NRW 5.28 | The WFD Assessment in Appendix 12.5 (Document 5.12.2.5) and the ES chapter (Document 5.12) make reference to the bathing waters within the Cemaes and Lligwy WFD water body catchments. Given the distances between |

| Table 3: Natural Resources Wales | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | the Proposed Development and these bathing waters, with no significant effects on the upstream water bodies, there is no potential for any significant effects on these WFD classifications and/or bathing water quality. |
| | For example, Afon Wygr drains to Cemaes where there is a designated bathing beach. There are other beaches around the coast of Anglesey (including Lligwy) at risk of faecal pollution that should be considered. More information on bathing waters can be found at https://naturalresources.wales/water/quality/bathing-water-uality/?lang=en | NRW 5.29 | See above. |
| 5 Air Quality | | | |
| | With regard to Air Quality, we have referred to Chapter 13. | NRW 6.1 | Noted |
| <i>Dust</i> | We note that Chapter 13, Section 8 Summary, identifies that dust mitigation measures are set out within the Draft Construction Environmental Management Plan (CEMP) for the Proposed Project. However, cannot yet agree that no additional measures, beyond those described in the chapter and the Draft CEMP are required, based on the current design iteration of the Proposed Project. | NRW 6.2 | The mitigation measures associated with the ES are described in Section 9 within ES Chapter 14 Air Quality and Emissions (Document 5.14). |
| | There is evidence that dust depositions of 500mg/m2/day could affect vegetation (Farmer, 1993) but the 1995 DETR report suggests a higher deposition of 1000mg/m2/day. There is a need to consider and confirm whether the dust control measures are sufficient to avoid dust deposition at designated sites at the deposition rates mentioned. Until this has been confirmed to are not able to confirm if the proposed mitigation is adequate to ensure that the construction phase will result in no deposition at designated sites and not have a significant effect on the interest features of protected sites, alone or in combination with other plans or projects. | NRW 6.3 | The assessment described in this ES is consistent with the method described in IAQM (2014) guidance, as summarised in Section 4 of ES Chapter 14 Air Quality and Emissions (Document 5.14) and Appendix 14.2 (Document 5.14.2.2). The mitigation required has been informed by this guidance and is set out in the CEMP (Document 7.4). Such measures are standard on all well managed construction sites across the UK and should provide a sufficient level of dust control. |
| <i>Road Traffic Emissions</i> | We acknowledge that the assessment of emission from road traffic on designated sites will be presented in the ES. Until this has been confirmed to are not able to confirm if the proposed mitigation is adequate to ensure that the construction phase will result in no deposition at designated sites and not have a significant effect on the interest features of protected sites, alone or in combination with other plans or projects. | NRW 6.4 | The method of assessment of road traffic emission impacts on ecological sites is described in Section 4 and Appendix 14.2 (Document 5.14.2.2) and Appendix 14.3 (Document 5.14.2.3), with impacts reported in Section 9, including any required mitigation, detailed in ES Chapter 14 Air Quality and Emissions (Document 5.14) |

| Table 3: Natural Resources Wales | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| <i>Construction Phase Energy Plant Emissions</i> | As already confirmed, to support the assessment of the project under the Conservation of Habitats and Species Regulations 2010 (as amended) , the ES will need to identify all potential impact pathways for European protected sites and clearly assess the possible levels of impact. | NRW 6.5 | The assessment described in this ES is consistent with the method described in IAQM (2014) and Environment Agency (2016) guidance, as summarised in Section 4 and Appendix 14.2 (Document 5.14.2.2) and Appendix 14.3 (Document 5.14.2.3). The significance of any effect at ecological sites is described in Chapter 9 Ecology and Nature Conservation (Document 5.9). |
| | The project has the potential to affect air quality and have in-direct effects on protected sites during the construction phase (due to both air pollution and dust), we advise that the ES should fully assess impacts of air pollution and dust on protected sites. | NRW 6.6 | The assessment described in ES Chapter 14 Air Quality and Emissions (Document 5.14) is consistent with the method described in IAQM (2014) guidance, as summarised in Section 4 and Appendix 14.2 (Document 5.14.2.2). |
| | NRW would expect the ES to include an assessment of the amount of predicted pollution from the proposal against the relevant nitrogen critical loads and relevant pollution critical levels for any designated sites that may be affected. NRW can provide further advice with respect to the critical load levels. | NRW 6.7 | The assessment described in ES Chapter 14 Air Quality and Emissions (Document 5.14) is consistent with the method described in IAQM (2014) guidance, as summarised in Section 4 and Appendix 14.3 (Document 5.14.2.3). Relevant site data has been sourced from the Air Pollution Information System (www.APIS.ac.uk). |
| | Chapter 13, Section 3.3.25 states “ <i>it is assumed that substantial energy plant, such as diesel fired generators, or similar, will be required to facilitate the tunnelling works</i> ”. We need details regarding the net rated thermal input of the proposed Energy Plant to further advise on which designated sites may be affected. | NRW 6.8 | The method of assessment of construction phase emergency generator emissions is described in Section 4 of ES Chapter 14 Air Quality and Emissions (Document 5.14) and Appendix 14.3 (Document 5.14.2.3), with the impacts reported in Section 9. |
| | Chapter 13, Table 13.2 identifies the application of 20 µg/m ³ for SO ₂ as the objective value for the assessment, however an additional Objective Value is required. 10µg/m ³ should be used for the protection of sensitive lichens within any protected site (see Table 31 of WHO Air Quality Guidelines for Europe for further information http://www.euro.who.int/__data/assets/pdf_file/0005/74732/E71922.pdf). | NRW 6.9 | The SO ₂ objective of 10µg/m ³ has been assumed throughout on a precautionary basis, as set out in Table 14.1 of ES Chapter 14 Air Quality and Emissions (Document 5.14). |

| Table 3: Natural Resources Wales | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | Chapter 13, Table 13.1, Section 3.133 identifies the relative sensitivity of ecological sites to be medium to low. However, the IAQM 2014 in its Box 8: Sensitivities of receptors to ecological effects suggests that the designated sites potentially affected by this development may be high sensitivity receptors or at the very least medium sensitivity receptors. The sensitivity of ecological sites needs to be confirmed. | NRW 6.10 | The assessment described in ES Chapter 14 Air Quality and Emissions (Document 5.14) is consistent with the method described in IAQM (2014) guidance, as summarised in Section 4 and Appendix 14.2 (Document 5.14.2.2). |
| | As confirmed in Chapter 13, Table 13.1, Section 3.134 the SoS highlighted that the IAQM 2014 guidance states that the distance of ecological receptors should be considered 50m from the site boundary and not the construction activity as identified in the Scoping Report. | NRW 6.11 | The assessment described in of ES Chapter 14 Air Quality and Emissions (Document 5.14) is consistent with the method described in IAQM (2014) guidance, as summarised in Section 4 and Appendix 14.2 (Document 5.14.2.2). However Box 1 of the IAQM guidance refers to '50 metres (m) from the boundary of the site...', Table 4 refers to 'Distance from the source...' |
| | We agree with the statement made in Chapter 13, Table 13.1, Section 3.137 that a quantitative dust assessment will be undertaken if vehicle movement increase over the stated amount, this will help to determine whether the mitigation measures are adequate to prevent dusts reaching the designated sites. | NRW 6.12 | The statement made in Chapter 13, Table 14.1, Section 3.137 of the PEIR referred to construction related vehicle emissions (typically NO ₂ , PM ₁₀ and PM _{2.5}), rather than dust. |
| | The impact of traffic emissions and pollutants to designated sites should be assessed based on the amount of pollutant that is predicted to land on the site. Although designed for regulated point sources, the principles and thresholds described in the GOV.UK "Air emissions risk assessment for your environmental permit" are applicable to any pollutant source, including road traffic. https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit | NRW 6.13 | The assessment of traffic emissions on designated sites has been undertaken following the method described in Section 4 of ES Chapter 14 Air Quality and Emissions (Document 5.14) and Appendix 14.3 (Document 5.14.2.3). This includes reference to the EA guidance. |
| | It is NRW's view that a change in pollution contributed to a designated site by a road modification that is above 1% of the relevant Environmental Assessment Level (EAL) ² is potentially significant. This view is supported by the Institute of Air Quality Management in their 2009 Guidance ³ and by the Environment Protection UK 2010 Guidance update ⁴ and is consistent with the GOV.UK Guidance. ² For example the agreed Objective, Limit Value, Critical Level (NO _x , SO ₂ , ammonia), minimum Nitrogen Critical Load, Acid Critical Load. | NRW 6.14 | The assessment of traffic emissions on designated sites has been undertaken following the method described in Section 4 within ES Chapter 14 Air Quality and Emissions (Document 5.14) and Appendix 14.2 (Document 5.14.2.2). |

| Table 3: Natural Resources Wales | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>³ IAQM Significance in air quality, November 2009. http://www.iaqm.co.uk/text/guidance/iaqm_significance_nov09.pdf . See paragraph 2, page 3.</p> <p>⁴ EPUK Development Control: planning for air quality (2010 update) http://www.environmental-protection.org.uk/wp-content/uploads/2013/07/EPUK-Development-Control-Planning-for-Air-Quality-2010.pdf . See Section 5.28.</p> | | |
| | If the process contribution (PC) to the receptor from the road traffic is not above 1% of the relevant EAL, then it can be concluded that the project is not likely to have a significant effect alone or in combination. | NRW 6.15 | The assessment of traffic emissions on designated sites has been undertaken following the method described in Section 4 of ES Chapter 14 Air Quality and Emissions (Document 5.14) and Appendix 14.2 (Document 5.14.2.2). |
| <i>Significance of the road in combination and cumulatively</i> | <p>In combination</p> <p>Under the Assessment of the project under the Conservation of Habitats and Species Regulations 2010 (as amended), if a Natura 2000 site is likely to receive a PC of over 1% from the road, then an assessment in combination with other relevant plans and projects is required. If the predicted environmental concentration (PEC), including background levels, this project's PC and any PCs from other plans or projects is above 70% of the EAL, then a conclusion of significant effect in combination is concluded. An appropriate assessment of the in combination impacts is required.</p> | NRW 6.16 | The assessment of traffic emissions on designated sites has been undertaken following the method described in Section 4 of ES Chapter 14 Air Quality and Emissions (Document 5.14) and Appendix 14.2 (Document 5.14.2.2). |
| | <p>Cumulative</p> <p>As part of the EIA, a cumulative assessment is required. For both Natura 2000 sites and SSSIs this is essentially similar to the further check described in the in combination assessment above. It can be completed at the same time as the in combination assessment.</p> <p>The models used to undertake the air quality assessments will need to include the final design details and a more accurate reflection of the Proposed Activities, prior to completion of the ES and HRA.</p> | NRW 6.17 | The assessment of traffic emissions on designated sites has been undertaken following the method described in Section 4 of ES Chapter 14 Air Quality and Emissions (Document 5.14) and Appendix 14.3 (Document 5.14.2.3). Cumulative impacts are described in Section 10 of ES Chapter 14. |
| 6 Noise and Vibration | | | |
| | Chapter 14 identifies sensitive receptors as human receptors, ecological receptors, and infrastructure receptors. NRW advise that the ES in support of the DCO should fully assess both construction and decommissioning impacts of noise and vibration on ecological receptors and on the special qualities of the Anglesey Area of Outstanding Natural Beauty (AONB). Please note, NRW does not comment on assessment of impacts on human receptors with respect to noise and | NRW 7.1 | Noise and vibration effects on ecological receptors have been considered within Chapter 9, Ecology and Nature Conservation (Document 5.9) |

| Table 3: Natural Resources Wales | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | vibration with regard to the ES in support of the DCO, and we recommend that PINS liaise with the relevant local authority for further advice. | | Effects on the AONB have been addressed in Section 9 mitigation and residual effects within ES Chapter 15 Construction Noise and Vibration (Document 5.15) and are not likely to be significant. |
| | The ES will provide information on the protected species within the proposed corridor. These could include species protected under the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2010 (as amended). Bats are particularly at risk of disturbance from noise and vibration. The ES should clearly set out how the impacts of noise and vibration on protected species have been assessed and detail any required mitigation and/or compensation. Please also refer to page 10 for further information regarding when a European Protected Species Licence would be required prior to commencement of works. | NRW 7.2 | Information on the likely effects due to operational noise has been shared with the ecology team during the preparation of the ES. There will not be any operational vibration effects and operational noise effects on wildlife are very low or negligible. |
| 7 Construction Environmental Management Plan | | | |
| | We note that the PEIR relies heavily on the production of an Environmental Statement which will provide further and more detailed information regarding the project in its entirety once the final design has been identified. | NRW 8.1 | This comment is noted. |
| | We have reviewed the draft CEMP provided in PEIR Appendix 4.2 and note that it includes brief details of the methods to be adopted during the work in relation to Pollution Control, Incident Response and Waste Management. | NRW 8.2 | This comment is noted. |
| | A comprehensive and site specific CEMP will be required in support of the ES and address all relevant environmental issues. Details shall include strategies relating to the management of soil, silt and materials and full details of pollution prevention, pollution incident response plan and waste management plan. | NRW 8.3 | A comprehensive CEMP (Document 7.4) has been prepared, addressing all the relevant environmental issues. The CEMP details strategies relating to the management of soil, silt and materials and details of pollution prevention, pollution incident response plan and waste management plan. |
| | The CEMP and ES should refer to and incorporate best practice to ensure environmental safeguards are in place. | NRW 8.4 | Section 9 of each technical chapter within the ES (Documents 5.7-5.18) details the mitigation measures and residual effects relevant to their assessment. |

| Table 3: Natural Resources Wales | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | <p>Schedule of Mitigation (Document 5.28) provides an overview of all the required mitigation measures for the Proposed Development.</p> <p>The CEMP (Document 7.4) presents the approach and application of environmental control and management measures (CMM) for the construction of the Proposed Development.</p> |
| | All waste arising needs to comply with the Environmental Permitting Regulations 2010. NRW require waste arising from the works to be disposed or recycled at a suitably permitted site. Waste movements must show duty of care under Section 34 of EPA '90. All waste carriers must be upper tier registered. | NRW 8.5 | <p>OWMP (Document 7.5) provides a strategy and action plan for the management of waste which is likely to arise during the construction phase of the Proposed Development.</p> <p>Where required, permits from NRW, will be sought prior to commencement of the site construction works.</p> |
| | We advise that the impacts of waste generated during both the construction and decommissioning phases should be fully assessed in the ES, including the large quantities of waste that will be generated by creating the tunnel. The applicant should be aware that there are a limited number of permitted waste sites within the vicinity of the Project area and that this should be considered when assessing the type and volume of waste that will be generated. | NRW 8.6 | Waste and materials management are discussed in the OWMP (Document 7.11) and the OMMP (Document 7.12) and associated effects are described in relevant ES chapters. |
| | The applicant should also be aware that a lack of waste options may also impact on the applicant's transport strategy and assessments of traffic volumes. | NRW 8.7 | This comment is noted. |
| 8 Cumulative Effects | | | |
| <i>Intra-Project Effects</i> | We note that Chapter 18 provides a preliminary assessment of the potential intra-project cumulative effects assessment (CEA) for the proposed project based on the preliminary assessments which have been undertaken. We note that a more detailed assessment of the intra-project effects will be provided in the ES that will accompany the DCO application. | NRW 9.1 | Since the publication of the PEIR Chapter 19 Intra-Project Effects (Document 5.19) has been revised. |

| Table 3: Natural Resources Wales | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | We agree as noted in Chapter 18, Section 11.1.8 that the individual technical chapters in the ES should report on the specific effects on each shared receptors and that this will be brought together in the full Intra-Project CEA and reported on in a separate ES chapter. | NRW 9.2 | This comment is noted. |
| | Chapter 18, Section 3.1.4 confirms that there is potential for some intra-project effects for several protected sites although it is later confirmed in Section 3.1.5 that all effects that would occur during construction would be temporary and only remain for the duration of the construction phase, and would not lead to an increase in the overall significance of the temporary adverse effect and no additional mitigation required. | NRW 9.3 | Intra-project effects on ecological receptors, including protected sites are assessed in ES Chapter 9 Ecology and Nature Conservation (Document 5.9). |
| | Chapter 18, Section 3.1.6 confirms that during operation receptors are likely to experience effects simultaneously only infrequently and that not all receptors will experience each cumulative effect to the same degree. | NRW 9.4 | This comment is noted. |
| | As the full design details are yet unknown and as we have not been provided with all survey results including on-going bird surveys we are not in a position to confirm agreement with the preliminary assessment of potential intra-project cumulative effect assessment. We will comment further on the significance of the intra-project effects once the Intra-Project Cumulative Effects Assessment has been provided as part of the ES. | NRW 9.5 | This comment is noted. |
| <i>Inter-Project Effects</i> | We note that Chapter 19 identifies the major development to be considered in the inter-project cumulative effects assessment (CEA) for the proposed project. | NRW 9.6 | This comment is noted. |
| | <p>Please note that the status of some of the projects identified and detailed in Chapter 19. Table 18.4 has progressed and requires updating. To our knowledge the following updates are required;</p> <p>Wylfa Newydd Nuclear Power Station – A Scoping Opinion was issued by The Planning Inspectorate April 2016.</p> <p>Wylfa Newydd Site Preparation and Clearance – it is anticipated that a planning application will be made to Isle of Anglesey County Council early 2017</p> <p>Glyn Rhonwy Pumped Storage – The Examining Authority needs to make a recommendation to the Secretary of State by the 8th December 2016. The Secretary of State thereafter will have 2 months in which to make their decision.</p> <p>A487 Caernarfon to Bontnewydd Bypass – Draft Orders and an Environmental Statement has been presented for consultation in September 2016.</p> | NRW 9.7 | The current known status of the projects identified in the CEA has been updated for this ES and is provided in Chapter 20 Inter-Project Cumulative Effects (Document 5.20) and its associated appendices. |

| Table 3: Natural Resources Wales | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>Grid Connection between Glyn Rhonwy pumped storage system and the sub-station at Pentir – This development was approved with conditions on 27/09/2016 under application reference C16/0886/15/LL</p> <p>Holyhead Deep (Minesto) – We confirm that we have a Marine Licence Application registered for the installation of a 10MW marine energy array on a seabed area west of Ynys Mon. It is proposed to undertake installation in 2017 subject to the required consents being approved. The Marine Licence application is supported by an ES that forms part of the EIA as well as a HRA report.</p> | | |
| 9 Other Consenting Regimes | | | |
| <i>Town and Country Planning Applications</i> | NRW notes that there will be separate applications under the Town and Country Planning Act 1990 (as amended) for certain parts of the connection corridor. | NRW 10.1 | This comment is noted. |
| <i>Marine Licence</i> | As identified in section 1.1.5 of the PEIR, certain works associated with the Proposed Project will require a Marine Licence under Part 4 of the Marine and Coastal Access Act 2009. The relevant EIA regulations for the purposes of a Marine Licence determination are the 'Marine Works (Environmental Impact Assessments) Regulations 2007 (as amended)'. As previously advised, we recommend National Grid to contact the Marine Licensing Team to request further pre-application advice and a scoping opinion under these regulations. | NRW 10.2 | The need for a Marine Licence is identified in ES Chapter 9 Ecology and Nature Conservation (Document 5.9). The responsibility of obtaining a Marine Licence would fall to the contractor, and therefore a Marine Licence application would be submitted at a later date. |
| | To seek a scoping opinion National Grid should provide the information detailed below to the Permit Receipt Centre - (Permit Receipt Centre Natural Resources Wales Cambria House 29 Newport Road Cardiff CF24 0TP) E-mail: permitreceiptcentre@naturalresourceswales.gov.uk (‘Marine Scoping Opinion’ should be clearly referenced on the correspondence). | NRW 10.3 | This comment is noted. |
| | <p>A request for a scoping opinion must be accompanied by the information outlined below and should be submitted as a ‘Scoping Report’ providing a draft outline of the ES and summarising what the main issues/effects are envisaged to be. The Scoping Report should also propose any relevant studies to be undertaken, where necessary, and/or useful sources of information;</p> <ul style="list-style-type: none"> A chart, plan or map sufficient to identify the location of the regulated activity and of other activities to be carried out in the course of the project | NRW 10.4 | The Scoping Report for the North Wales Connection Project was issued on 4 th May 2016 and the scoping opinion was issued by the Secretary of State (SoS) on 1 st July 2016. |

| Table 3: Natural Resources Wales | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <ul style="list-style-type: none"> A brief description of the nature and purpose of the project and the regulated activity and their possible effects on the environment Such other information or representations as the applicant may wish to provide or make | | |
| | Before issuing a scoping opinion, we will consult with internal experts and a number of consultation bodies, which may include the Centre for Environment, Fisheries and Aquaculture Science (Cefas) and the relevant Local Planning Authority. | NRW 10.5 | This comment is noted. |
| | The UK Marine Policy Statement should be considered as relevant policy for the aspects of the works in the UK marine area. National Grid should also be aware of the ongoing development of the Welsh National Marine Plan. | NRW 10.6 | This comment is noted. |
| | The Cabinet Secretary for Environment and Rural Affairs launched a formal public consultation to seek views on proposals to change the fees and associated charges for marine licensing in Wales. The closing date for submission of comments was 28 November 2016 and the new fees and charges are due to be implemented from April 2017. | NRW 10.7 | This comment is noted. |
| <i>Environmental Permit</i> | Certain part of the proposals including the site office, welfare facilities and wheel wash may need an Environmental Permit under the Environmental Permit Regulations (EPR) 2010. | NRW 10.8 | This comment is noted. |
| | The written consent of NRW or registration for exemption by the developer will be required for any discharge e.g. foul drainage to a watercourse/ditch etc., from the site and may also be required for certain categories of discharges to land. | NRW 10.9 | This comment is noted. |
| | All necessary NRW consents, or exemptions must be obtained prior to works progressing on site. | NRW 10.10 | This comment is noted. |

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5 Welsh Government

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| Table 4: Welsh Government | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| First Minister of Wales | | | |
| Well-being | <p>The Welsh Government remains one of the few administrations in the world to have a distinctive statutory duty in relation to sustainable development. The Well-being and Future Generations (WFG) Act 2015 puts in place seven wellbeing goals to ensure that public bodies (including local planning authorities) are all working towards the same vision of a sustainable Wales. The WFG Act acts as a 'lens' through which all aspects of the project should be assessed and an integrated view developed of its impact. In order for this project to contribute to meeting these goals, the Welsh Government would recommend that the following core principles, cutting through all elements of the development, are adopted by National Grid.</p> <p>A higher skilled, qualified and experienced local workforce.</p> <p>A more balanced and stronger economy.</p> <p>To protect and sustain cohesive and healthy communities.</p> <p>To create an environment where the Welsh language and culture is actively valued and promoted.</p> <p>Greater sustainability in the tourism sector.</p> <p>Enhanced image and perception of Wales.</p> <p>Maintain and enhance Wales' natural environmental assets.</p> | WG 2.3 | The WLIA is presented as Document 5.26 . A Well-being Report is presented as Document 5.27 . |
| Economy | <p>The Welsh Government's aspiration for any significant infrastructure project in Wales is to ensure employment, supply chain opportunities and inward investment opportunities are secured in a manner that will deliver significant economic and social benefit. Benefits to the local and regional areas must demonstrate multiplier effects, without causing significant displacement or detriment to established Welsh businesses.</p> | WG 2.4 | <p>As no significant socio-economic effects are identified for the Proposed Development, no mitigation is proposed. No enhancement measures are described in Chapter 17 Socio Economics.</p> <p>Proposed enhancement measures are documented in the Enhancement Strategy (Document 7.13).</p> |
| Welsh Government's proposed Third Menai Crossing | <p>Welsh Government welcomes National Grid's commitment in the PAC documents to keep the option of utilising the third crossing under review as proposals progress. Welsh Government will be convening a meeting between Senior Officials in the near future as well as continuing more technical discussions with your project team.</p> | WG 2.5 | <p>National Grid has worked, and continues to work, closely with Welsh Government on their plans for a third crossing at the Menai Strait. Welsh Government officials are keen to understand if it's possible for a bridge to carry</p> |

| Table 4: Welsh Government | | | |
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| | <p>I am delighted to announce that the process for delivering a new crossing is now gaining momentum with additional technical support having been appointed to produce the route selection study for the new bridge and recommend a preferred solution by May 2018. Following the completion of this work the next stages are to:</p> <p>Publish draft Orders: Sept 2019</p> <p>6 week objection period: Nov 2019</p> <p>Decision whether to hold Public Inquiry (PI): Nov 2019</p> <p>Publish Made Orders: Nov 2019 (no PI) or July 2020 (with PI)</p> <p>Commitment to proceed to construction- Dec 2019 (no PI) or Sept 2020 (with PI)</p> <p>Completion of works – Feb/ March 2022 (no PI) or Dec 2022 (with PI)</p> <p>A collaborative approach could allow the construction of the bridge to be prioritised and completed by end of Q3 2022. This would be some 2-3 years ahead of the required connection, and ahead of the biggest cumulative impact of construction activities.</p> <p>National Grid is therefore requested to take forward two options into their DCO. Option A Tunnel and Option B Bridge. The approach for including two options for DCO examination has been established through the North Wales Windfarms Connection Project.</p> | | <p>the new electrical connection needed for Wylfa Newydd. As part of this, Welsh Government has commissioned National Grid to undertake a feasibility study into potential options to use the bridge.</p> <p>There are a lot of things to consider before National Grid and Welsh Government will be able to understand if putting cables of the size required for the new electrical connection on a new bridge is possible. To our knowledge, there are no high voltage transmission cables on a bridge anywhere in the world. Costs, technical considerations, route on and off the bridge and timing are just some of the things to be worked out.</p> <p>In addition, any proposal for a third Menai crossing put forward by Welsh Government needs to be consented and funded before it can go ahead.</p> <p>At the same time, it's vital that National Grid is able to deliver a connection for Horizon in the mid-2020s, when it is expected that Wylfa Newydd would start generating. This is why National Grid is continuing with the plans for a tunnel under the Menai Strait. When completed, the feasibility findings will be considered and next steps agreed.</p> |
| Transport | <p>Welsh Government is concerned that the Traffic and Transport chapter of the Preliminary Environmental Information Report (PEIR) has not provide a robust analysis of traffic impacts, in particular the cumulative impact of HGV numbers from all projects likely to be under construction during the same 5 year period (approximately 600 average/day) and the significant impact on Britannia Bridge and the A55.</p> | WG 2.8 | <p>The traffic impacts of the Proposed Development are fully reported in ES Chapter 13 Traffic and Transport (Document 5.13) and the Transport Assessment (Document 5.13.2.1). Also included within the each of these reports is a cumulative assessment reflecting committed schemes that will be under construction or complete during the</p> |

| Table 4: Welsh Government | | | |
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| | | | <p>construction period for the Proposed Development.</p> <p>The impact of the proposed scheme on the A55 and Britannia Bridge has been assessed in ES Chapter 13 Traffic and Transport (Document 5.13) and the associated Transport Assessment (Document 5.13.2.1). The scope of the Transport Assessment has been agreed with Welsh Government, IACC and Gwynedd Council, including the extent of the trunk road network that has been assessed.</p> |
| Mitigation | <p>There is a need to explore collaboratively appropriate mitigation options, and my officials are keen to engage with you to establish how the impacts from your project can be resolved. Almost a third of these HGV movements are associated with your proposals for the tunnel, and it is not clear in the consultation documents as to where the waste arisings are going to be taken for disposal or recycling. Welsh Government would be keen to explore the potential opportunities for recycling this aggregate on regeneration schemes being developed in the region should the tunnel option actually be constructed. However collaboration on the provision of a third crossing could remove approximately a third of the HGV movements and also ensure capacity (and access in bad weather) for the HGV movements required for the rest of your project across the Island, and the Wylfa Newydd development.</p> | WG 2.9 | <p>An Outline Waste Management Plan (OWMP) (Document 7.11) has been produced; this considers potential destinations for arisings and has been the subject of discussions at meetings with the North Wales Minerals and Waste Planning Service, IACC, Gwynedd Council and NRW, as well as Horizon Nuclear Power.</p> <p>In addition to the OWMP, an Outline Materials Management Plan (OMMP) has been produced as part of the DCO application (Document 7.12) which will ensure that materials and arisings generated by the construction works would not be classified as a waste for disposal where possible.</p> <p>For example, tunnel arisings will be treated and sorted at the tunnel head compound prior to leaving site for recycling and re-use where possible. Materials used in haul road and pad construction will be excavated on completion and recycled for future use where possible.</p> <p>Within the OWMP, potential facilities and sites have been identified on Anglesey and in North</p> |

| Table 4: Welsh Government | | | |
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| | | | <p>Wales for the recovery, recycling and disposal of tunnel spoil. These sites include existing quarries and landfills with permits for recycling material.</p> <p>National Grid will work with the North Wales Minerals and Waste Planning Service, NRW, Welsh Government, IACC and Gwynedd Council to explore opportunities for recycling aggregate as the Project progresses and as and when any new options arise.</p> <p>With regards to the Welsh Government's plans for a third Menai crossing, please see National Grid's response under Reference Code 2.5 above.</p> |
| Housing/Accommodation | <p>The consultation documents identifies that the majority of construction workers would take up spare capacity in tourism accommodation. However it does not acknowledge that Wylfa Newydd construction workers are also likely to be competing for some of the same bedspaces, and whether sufficient capacity exists within the sector to meet this demand.</p> <p>Contingency measures need to be in place to assist both the tourism sector and the housing sector cope with the demand. This should be undertaken in collaboration with Welsh Government, Gwynedd and Ynys Mon Councils, and Horizon Nuclear Power to produce a robust framework to develop a comprehensive accommodation strategy.</p> | WG 2.10 | <p>This comment is noted.</p> <p>Chapter 17 Socio-Economics (Document 5.17) includes an assessment of cumulative effects (section 10), including consideration of cumulative demand on tourism accommodation and bed spaces in the Private Rented Sector (PRS).</p> <p>As no significant socio-economic effects are identified for the Proposed Development, no mitigation is proposed. No enhancement measures are described in Chapter 17 Socio Economics. Proposed enhancement measures are documented in the Enhancement Strategy (Document 7.13).</p> |
| Tourism | The consultation documents identify that the project could result in a loss of trade for some tourism businesses. Consequently we consider that National Grid should identify how this | WG 2.12 | Potential effects on tourism businesses have been assessed and are described in the ES |

| Table 4: Welsh Government | | | |
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| | impact will be mitigated to address this potential loss of earnings during development and after completion, including the consideration of undergrounding. | | Chapter 17 Socio-Economics, sections 8 and 9 (Document 5.17). |
| Welsh Language | There is currently no reference to matters regarding the Welsh Language within the consultation documents. Although we are aware that National Grid will be producing a Welsh Language Impact Assessment, it is disappointing that the assessment has not been produced as part of the overall pre-application consultation. This would have allowed both stakeholders and the public an opportunity to consider its contents and provide comments as part of the formal Section 42 pre-application consultation process. | WG 2.13 | National Grid's intention to produce a WLIA was clearly stated in the socio-economics chapter of the PEIR and the Scoping Report prior to that, providing an opportunity for stakeholders and the public to provide comments as part of the formal section 42 pre-application consultation process. A WLIA has been carried out and accompanies the DCO Application as Document 5.26 . |
| Historic Environment | The precise level of impact on the scheduled monuments will need to be fully assessed during the production of the environmental impact assessment (EIA) and careful consideration of the location of pylons and other infrastructure components will need to be considered, as will any appropriate mitigation measures that can be instigated to reduce the impact. | WG 2.14 | Potential effects on the historic environment and mitigation measures where appropriate are identified in ES Chapter 10 Historic Environment (Document 5.10). |
| | It is clear that the construction of an overhead line across such a rich historic landscape such as Anglesey cannot be carried out without some significant impact occurring to heritage assets. There is therefore a need to consider if appropriate enhancement proposals, such as the removal or realignment of existing local overhead lines to improve the inter-visibility between monuments, could be carried out in compensation. | WG 2.15 | The Welsh Government's preference for the removal or re-alignment of existing local overhead lines is noted. It is possible that a number of lattice pylons and wood poles carrying local overhead lines will be removed. This would have the potential to reduce overall effects on a number of monuments including Maen Addwyn standing stone (AN069) and Bryn-Celli-Ddu Burial Chamber (AN 002). |
| Best and Most Versatile Agricultural Land | The Welsh Government always prefers that Best and Most Versatile Agricultural land (BMV) is avoided. If a BMV site is selected over a non-BMV site, the reasons for its selection should be clearly set out so they can be considered against national planning policy. | WG 2.16 | The Best and Most Versatile Agricultural Land has been considered throughout the agriculture assessment presented in ES Chapter 18 Agriculture (Document 5.18). The avoidance of BMV land has been a driver of the iterative design process and therefore, where practicable within the constraints identified by other disciplines, and therefore |

| Table 4: Welsh Government | | | |
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| | | | the preference of the Welsh Government has been considered throughout the process. The assessment has concluded that effects on BMV would not be significant. |
| Flood Risk | Chapter 11 of the PEIR makes reference to definitions contained in the National Planning Policy Framework (NPPF). This policy document is relevant to England. Whilst National Policy Statements (NPS) are applicable in Wales the NPPF is not. The relevant reference in Wales is Planning Policy Wales (PPW) (Edition 9 November 2016) and Technical Advice Note (TAN) 15: Development and Flood Risk. | WG 2.17 | The FCA (Document 5.12.1-4) has been carried out in accordance with the requirements of Planning Policy Wales 9 and TAN 15. The same applies to the ES chapter (Document 5.12). However, the English NPPF is still acknowledged within the assessments insofar as it is referred to in NPS EN-1. |
| | The reference to climate change projections is not correct. The Welsh Government issued a clarification letter (CL-03-16) on the 23 August 2016 regarding the application of climate change allowances in Wales. A copy of the letter can be downloaded at http://gov.wales/topics/planning/policy/policyclarificationletters/2016/cl-03-16-climate-change-allowances-for-planning-purposes/?lang=en | WG 2.18 | In Document 5.12.1.1 the FCA has both taken into account Welsh Government guidance on Climate Change on FCERM (Ref 12.17) and the referenced Policy clarification letter on Climate Change Allowances. |
| | In conclusion, the North Wales Grid Connection is a key infrastructure project in North Wales and my officials stand ready to work closely with National Grid and all key stakeholders where appropriate to deliver a lasting legacy from this project for the people of Wales. | WG 2.19 | Consultation with Welsh Government, NRW and other relevant technical stakeholders has occurred throughout the evolution of the Proposed Development, as documented in Chapter 5 of the Environmental Statement, EIA Consultation (Document 5.5) and the Consultation Report (Document 6.1). |
| Response to National Grid's Pre-Application Consultation on the North Wales Connection | | | |
| | <p>This response has been compiled from responses received from Welsh Government Official policy leads from the relevant department. It has been presented in no particular order of preference.</p> <p>It should be considered to be a technical response from officials, and is not the position of Welsh Ministers.</p> | WG 4.1 | This comment is noted. |

| Table 4: Welsh Government | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| Transport | <p>Issue that needs to be investigated/addressed</p> <p>Construction traffic and proposed works affecting the trunk road network.</p> <p>Evidence/Statistic</p> <p>Detailed transport assessment accompanied by a model to determine the extent of the impact, which must include all permitted developments which you believe may affect your assessment one being the proposed Wylfa Newydd Works.</p> <p>Details regarding the proposed number of workers and travel arrangements must be incorporated into the assessment.</p> <p>Nature of Impact</p> <p>Traffic congestion with possible network capacity issues</p> <p>Proposed means of addressing/mitigating Impact</p> <p>Develop a detailed transport assessment to assess all affected trunk roads including:-</p> <ul style="list-style-type: none"> A55 – Junctions - 3, 4, 5, 6, 7, 7A, 8, 8A, 9, 10, 11 and the main carriageway including Britannia Bridge. A487 – J. 9 to Caernarfon/Bont-Newydd Scheme extents. <p>If the conclusion of the assessment determines that the proposal will affect the trunk road network, then suitable mitigation measures must be presented which assist in limiting the impact during the construction period.</p> <p>Relevant National/Local Planning Policy and/or WBFG Goal (why it is a material planning consideration)</p> <p>The relevant standard is the Design Manual for Roads and Bridges (DMRB) which is the set standard for all trunk roads in Wales.</p> | WG 4.2 | <p>Transport</p> <p>The scope of the Transport Assessment (Document 5.13.2.1) has been agreed with Welsh Government, IACC and GC, including the extent of the trunk road network that has been assessed.</p> <p>An OCTMP (Document 7.5) includes appropriate mitigation measures for the Proposed Development.</p> |
| | <p>Issue that needs to be investigated/addressed</p> <p>Delivery of Abnormal Loads and the use of the trunk road network.</p> <p>Evidence/Statistic</p> | WG 4.3 | <p>An abnormal invisible load (AIL) report has been produced and is contained within the OCTMP (Document 7.5) further details on AILs are also contained within the Transport Assessment (Document 5.13.2)</p> |

| Table 4: Welsh Government | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>Detailed Traffic Management Plan (TMP) accompanied to determine the extent of the impact, and detailed analysis of the areas which may require modifying to accommodate the proposed loads.</p> <p>Nature of Impact</p> <p>Traffic congestion with possible network delays during the delivery programme. Possible damage to the trunk road carriageway.</p> <p>Proposed means of addressing/mitigating Impact</p> <p>Develop a detailed TMP to assess all affected trunk roads from the point of entry onto the Welsh Trunk Road Network to the proposed site.</p> <p>The TMP must include:-</p> <ul style="list-style-type: none"> • Structural Assessment • Condition Surveys – Pre and Post Movements. • Liability for Incidental Damage • proposals for transporting AILs from their point of entry to the Welsh trunk road network to the site that minimise any impact on the safety and free flow of trunk road traffic; • evidence of trial runs that mimic the movement of the worst case AILs along the access route; • number and size of AILs, including loaded dimensions and weights; • number and composition of AIL convoys, including anticipated escort arrangements; • methodology for managing trunk road traffic during AIL deliveries, including identification of passing places and holding areas as necessary; • convoy contingency plans in the event of incidents or emergencies; • estimated convoy journey durations and timings along the route, including release of forecast traffic queues; • swept path analysis modelling the movement of the worst case AILs at all potential horizontal and vertical constraints along the access route; | | <p>Proposed TROs are detailed with the DCO plans and schedules.</p> <p>Proposed physical and non-physical highway mitigation measures are included within the Transport Assessment (Document 5.13.2) and the OCTMP (Document 7.5)</p> |

| Table 4: Welsh Government | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <ul style="list-style-type: none"> proposals for the temporary or permanent modification of any affected street furniture along the access route and details of how this would be managed; plans for the reinstatement of any temporary works after completion of the construction phase; land ownership must be clarified on all drawings showing proposed highway modifications. The developer shall be responsible for the acquisition and reinstatement of all third party land including re-instatement of boundary features; proposals to liaise with all relevant stakeholders and members of the public regarding construction traffic and AIL movements; consideration of the cumulative impact of other schemes proposing to use all of part of the same delivery route (Wylfa Newydd). Highway Works Road Safety Audit Section 278 Agreement (if necessary) Accesses TRO's <p>Relevant National/Local Planning Policy and/or WBFG Goal (why it is a material planning consideration)</p> <ul style="list-style-type: none"> The relevant standard is the Design Manual for Roads and Bridges (DMRB) which is the set standard for all trunk roads in Wales. <p>Overarching National Policy Statement for Energy (EN-1)</p> <p>Paragraph 5.13.1 – The transport of materials, goods, and personnel to and from a development during all project phases can have a variety of impacts on the surrounding transport infrastructure and potentially on connecting transport networks, for example through increased congestion.</p> <p>Paragraph 5.13.2 – The consideration and mitigation of transport impacts is an essential part of the Government's wider policy objectives for sustainable development.</p> | | |

| Table 4: Welsh Government | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>Paragraph 5.13.3 – If a project is likely to have significant transport implications, the applicant's ES (see section 4.2) should include a transport assessment, using the WelTAG methodology.</p> <p>Paragraph 5.13.4 – The applicant should also provide details of proposed measures to improve access by public transport, walking, and cycling to reduce the need for parking with the proposal and to mitigate transport impacts.</p> <p>Paragraph 5.13.10 – Water-borne or rail transport is preferred over road transport at all stages of the project, where cost effective.</p> | | |
| Welsh Government Owned Land and Highway Land. | <p>Issue that needs to be addressed</p> <p>Legal Agreements need to be assessed and agreed with all legal departments to ensure land is suitably designated, with sufficient easements for installation and maintenance.</p> <p>Evidence/Statistic</p> <p>Proposed wording of agreements and relevant documents, in-line with accurate land plans.</p> <p>Nature of Impact</p> <p>Land issues and the operation of the Trunk Road Network.</p> <p>Proposed means of addressing/mitigating Impact</p> <p>Regular meetings to discuss proposals, with clear objectives for each party/department.</p> <p>Legal Easements.</p> <p>Relevant National/Local Planning Policy and/or WBFG Goal (why it is a material planning consideration)</p> <p>The relevant standard is the Design Manual for Roads and Bridges (DMRB) which is the set standard for all trunk roads in Wales.</p> | WG 4.4 | National Grid has identified where land agreements such as easements are required for the installation and maintenance of the North Wales Connection Project. This includes those relating to Welsh Government owned land and highway land, which are the subject of ongoing joint discussions and agreements. |
| Transport | <p>Issue that needs to be investigated/addressed</p> <p>Environmental Impact of proposed works, taking into consideration the screening and/or mitigation as set out in the Environmental Statement for the A55 DBFO across Anglesey.</p> <p>Evidence/Statistic</p> | WG 4.5 | ES Chapter 13 Traffic and Transport (Document 5.13) and the Transport Assessment (Document 5.13.2.1) address the points raised. |

| Table 4: Welsh Government | | | |
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| | <p>Environmental Impact Assessment on all proposed works</p> <p>Nature of Impact</p> <p>Possible removal and damage of designated areas relevant to the construction and acceptance of the A55 DBFO across Anglesey.</p> <p>Proposed means of addressing/mitigating Impact</p> <p>Develop a detailed Environmental Impact Assessment on all the proposed works, which highlights the designated areas and mitigate works in these areas with suitable designs.</p> <p>Relevant National/Local Planning Policy and/or WBFG Goal (why it is a material planning consideration)</p> <ul style="list-style-type: none"> • Planning Policy Wales • Well Being of Future Generations Act – all seven goals should be considered. • All other relevant EC, UK and Welsh legislation, policy and guidance. • The relevant standard is the Design Manual for Roads and Bridges (DMRB) which is the set standard for all trunk roads in Wales. | | |
| Tourism | <p>Issue that needs to be investigated/addressed</p> <p>Overall the Welsh Government tourism sector team are not comfortable that the potential impacts on the tourism sector have been fully embraced. It is recognised that National Grid are undertaking a number of visitor behaviour surveys, and we would welcome the opportunity to see and discuss the results of these. However visitor surveys have to be seen in light of responses being a moment in time and without the potential impacts from the construction being real.</p> <p>Welsh Government is very concerned that there is now a proposed additional pressure to the accommodation stock in the area, in addition to the 10,700 proposed workers for Wylfa Newydd.</p> <p>The traffic problems on the A55 around peak holiday times are already an issue for the region and adding significant additional traffic onto this (especially increasing delays on Britannia Bridge) would cause problems with regards to visitor experience and future perception of North Wales as an accessible destination.</p> | WG 4.6 | <p>The Transport Assessment (Document 5.13.2.1) includes an analysis of seasonal traffic volumes and the programme for the construction of the Proposed Development. An assessment of traffic impacts on the A55 is included in this assessment.</p> <p>Chapter 17 Socio Economics (Document 5.17) includes an assessment of effects on individual tourism receptors and the tourism sector as a whole (Sections 8 and 9). The tourism assessment includes a receptor-based assessment and a visitor survey.</p> <p>Tourism Accommodation is considered as a specific strand in the assessment of socio-economic effects;</p> |

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| | <p>North Wales was recently voted the 4th best destination to visit in the world by lonely planet and much of this was based on the exceptional natural landscape and how the tourism sector is reinventing how to enjoy this. We expect North Wales to benefit from an increase in visitors and spend from this designation so we need to be mindful of the huge economic impact that this brings to the region.</p> <p>The effects on the tourism sector are considered within Anglesey and Gwynedd only. This should be expanded to consider Conwy who are also likely to be impacted by demands on accommodation and the perceived negative perception impacts of transport congestion.</p> <p>The economic impact of tourism in Anglesey is very significant indeed. The main official statistics surveys on tourism (the Great Britain Tourism Survey, the International Passenger Survey and the GB Day Visits Survey) indicate that gross direct expenditure by tourists/visitors to Anglesey is around £200 million annually (the annual average in the years 2012-14 being £198 million).</p> <p>The economic impact figure from the STEAM economic impact model and used by IACC is £260 million annually. This figure includes a multiplier to account for indirect (second wave) expenditure to reflect tourism's wider economic impact. Taking this factor into account, the STEAM figures present a similar picture to those from Official Statistics sources. On this basis, Anglesey's economy benefits by some £260 million annually from tourism. Looking at this over a five year period (i.e. construction), the sector's contribution is some £1.3 billion. The value and importance of the sector needs to be taken into account when considering the potential affect of the visual impacts from the overhead lines on the tourism offering.</p> <p>Relevant National/Local Planning Policy and/or WBFG Goal</p> <p>Overarching National Policy Statement for Energy (EN-1)</p> <p>Paragraph 5.12.3 – consider all relevant socio-economic impacts, which may include effects on tourism.</p> <p>Planning Policy Wales (Edition 9, November 2016)</p> <p>Paragraph 11.1.1 – Tourism is vital to economic prosperity and job creation in many parts of Wales.</p> | | <p>The Study Area for the identification of potential effects on Tourism Accommodation has been defined using the Travel To works Areas (TTWA) for Holyhead, Bangor, Caernarfon and Llangefni.</p> <p>As no significant socio-economic effects are identified for the Proposed Development, no mitigation is proposed. No enhancement measures are described in Chapter 17 Socio Economics. Proposed enhancement measures are documented in the Enhancement Strategy (Document 7.13).</p> |
| Agricultural Land Classification (ALC) and policy relating to Best and Most Versatile (BMV) | <p>Issue that needs to be addressed</p> <p><i>Chapter 17 of PIER:</i></p> | WG 4.7 | In areas of agricultural land not assessed by a soil survey (areas of temporary development and pylon locations), purchased LandIS NATMAP data (soils map) and "Soils and their |

| Table 4: Welsh Government | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| <p>agricultural land (PPW4.10.1)</p> <p>Department for Environment and Rural Affairs</p> | <p>Table 17.1 Paragraph 3.168:</p> <p>Agreement on soil survey method for ALC has been reached between the Developer and the Department. It is not the responsibility of NRW as stated in the Paragraph.</p> <p>Paragraph 3.3.19: agree that 20ha threshold for BMV loss represents a nationally significant loss.</p> <p>Table 17.2 Best and most versatile agricultural land (ALC Grades 1, 2 and 3a): Where there are choices to be made over the location of particular parts of the Development, the Department always prefers that BMV land is avoided. If a BMV site is selected over a non-BMV site, the reasons for its selection should be clearly set out so they can be considered against national planning policy (4.10.1).</p> <p>Paragraph 5.1.7: covers the necessary topics to avoid damage to soils and to maintain the quality of agricultural land and will be incorporated into the CEMP.</p> <p>Evidence/Statistic</p> <p>To be gathered through agreed methodology.</p> <p>Nature of Impact</p> <p>To be defined once baseline evidence has been gathered</p> <p>Proposed means of addressing/mitigating Impact</p> <p>Relevant National/Local Planning Policy and/or WBFG Goal (why it is a material planning consideration)</p> <p>PPW 4.10.1 – Conserving Best and Most Versatile (BMV) agricultural land</p> <p>A resilient Wales.</p> <p>A globally responsible Wales.</p> | | <p>use in Wales” have been used to determine the likely proportion of BMV land through the identification of potential Subgrade 3a or 3b land. This methodology has been agreed with the Welsh Government’s Land Quality Advisory Service.</p> <p>The National Planning Policy has been carefully reviewed and the ‘need to protect the Best and Most Versatile Agricultural Land’ has been considered throughout the Agriculture assessment. The avoidance of BMV land has been a driver of the iterative design process and therefore, where practicable within the constraints identified by other disciplines, and therefore the preference of the Welsh Government has been considered throughout the process.</p> <p>An assessment of soil loss and soil damage has been undertaken as part of the EIA.</p> <p>The ES, CEMP (Document 7.4) and the OSMP (Document 7.10) details best practice measures for the handling, storage and restoration of soil resources to ensure land is restored to its pre-development agricultural quality.</p> |
| <p>Historic Environment – CADW Response</p> | <p>Issue that needs to be addressed</p> <p><i>Scheduled Monuments</i></p> <p>It is noted that the Preliminary Environmental Information Report (PIER is an initial assessment and that further field evaluations and setting impact studies are on-going: However, so far,</p> | WG 4.8 | <p>It is acknowledged that the Welsh Government agreed with the initial assessment. The assessment has been developed further for the ES in light of the final</p> |

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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>chapter 9 of the PIER (Historic Environment) has identified that the proposed connection will have a significant impact on the following 11 scheduled monuments and we concur with this appraisal.</p> <p>AN002 Bryn-Celli Ddu Burial Chamber</p> <p>AN030 Standing Stones</p> <p>AN069 Maen Addwyn</p> <p>AN070 Llech Golman</p> <p>AN079 Llifad Carraglefn</p> <p>AN080 Standing Stone 410m North of Church</p> <p>AN084 Tyddyn-Bach Standing Stone</p> <p>AN085 Bryn-Celli Ddu Standing Stone</p> <p>AN110 Pen –y Morwyd round Barrow</p> <p>CN203 Gors y Brithdir Enclosed Hut Group & Ancient Fields</p> <p>CN375 Coed Nant-y-Garth, Standing Stone</p> <p>The precise level of impact on the scheduled monuments will need to be fully assessed during the production of the environmental impact assessment (EIA) and careful consideration of the location of pylons and other infrastructure components will need to be considered, as will any appropriate mitigation measures that can be instigated to reduce the impact.</p> <p>In one case, AN002 Bryn-Celli Ddu Burial Chamber, it is our opinion that the value of the site has been understated. The monument is designated as a scheduled monument and in accordance with the Table 9.2 it has been given a value of “High”. However as acknowledged in section 5.4.58, it is recognised as one of the finest passage tombs in Wales and is a popular tourist attraction. The recent studies concluding that it is aligned on the mid-summer sunrise along with its close typological connections to similar Irish monuments and its regular inclusion in discussions in academic articles leads us to consider that this monument is an asset of acknowledged international importance and that it should therefore be given a value of “Very High”. In order for the full impact of the development to be assessed as part of the EIA process it would be of great assistance if, along with photomontage U showing the view to the north of the Bryn-Celli Ddu Burial Chamber, a photomontage showing the view to the east (towards the</p> | | <p>scheme design and appropriate measures have been identified.</p> <p>Effects on Bryn-Celli Ddu Burial Chamber have been assessed in further detail in ES Chapter 10 Historic Environment (Document 5.20). The suggestion that the value of the monument should be upgraded has not been accepted. The apparent alignment on the midsummer sunrise is an important aspect of the heritage significance of this monument and has been considered in the assessment. Nevertheless, such an alignment is not unique and does not necessarily elevate the monument to international importance.</p> <p>A photomontage is included in the ES to show the view from the monument, including the view to the east. Other photomontages have also been included, with the chosen locations based on comments received from the local authorities. This includes the Standing Stone to the north Coed Nant-y-Garth.</p> <p>A programme of archaeological evaluation has also been completed and the result of this are reported in the ES. This has included a geophysical survey, the scope of which was agreed with the local authorities.</p> <p>Comments with respect to Registered Parks and Gardens are noted and agreed.</p> <p>With regard to the Registered Dinorwig Landscape of Outstanding Historic interest, an ASIDOHL has been included as Appendix 3 (Document 5.10.2.3) to the chapter.</p> |

| Table 4: Welsh Government | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>rising sun) from the entrance passageway to the tomb could be produced. This would clarify that the proposed development would not have a significant impact on this identified significant view.</p> <p>Whilst a number of photomontages have been produced showing general views of the proposed route, bespoke visualisations will need to be created to illustrate the way the proposals might impact on particular elements of the settings of historic assets; photomontages from, towards and where appropriate, between assets will need to be prepared. This is particularly important in regard to publically inaccessible sites such as CN375 Standing Stone to N of Coed Nant-y-Garth.</p> <p>The PIER has been prepared by a desk-based assessment using existing datasets along with Lidar analysis and walkover surveys. However there remains a potential for so far undiscovered significant archaeological sites being present in the development area. In the event that significant archaeological remains are discovered it is National Grid's intention to re-locate pylons that will have a direct impact on them. The movement of the pylons could alter the impact of the development on the settings of the heritage assets and therefore it is essential that a programme of archaeological investigation (including geophysical survey and field evaluation) is carried out before the EIA is completed so that an appropriately informed assessment of the impact of the development on the setting of the heritage assets can be produced.</p> <p>Finally, it is clear that the construction of an overhead line across such a rich historic landscape such as Anglesey cannot be carried out without some significant impact occurring to heritage assets. There is therefore a need to consider if appropriate enhancement proposals, such as the removal or realignment of existing local overhead lines to improve the inter-visibility between monuments, could be carried out in compensation</p> <p><i>Registered Parks and Gardens</i></p> <p>The grade I registered historic parks and gardens at Plas Newydd and Vaynol are located on either side of the Menai Strait on the route of the proposed power line (section F Afon Braint to Pentir). Plas Newydd and Vaynol have been identified in the PEIR as sites which may be subject to significant effects and are regarded as sites of high value. The grade II registered garden at Cestyll is also identified within the study area of section A (OHL from the Wylfa substation to Rhosgoch).</p> <p>Figure 13.2 of the Menai Crossing Report depicts the proposed undergrounding route, proposed area of Tunnel Head House and Cable Sealing End Compound and temporary construction compound areas. The proposal to underground the power lines and to locate the</p> | | |

| Table 4: Welsh Government | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>associated infrastructure outside of Plas Newydd and Vaynol and their immediate setting reduces the impact of the proposals on these grade I registered parks. The potential need for landscape screening to mitigate visual impact of the tunnel head house and compounds on the registered parks is highlighted. As stated in para 6.2.10 of the PEIR, new planting should not be incongruous with the local landscape; in our opinion, this is particularly the case in the vicinity of the registered parks. The direct and indirect impacts of these structures together with the proposed pylons on the registered parks will require further assessment in the forthcoming Environmental Statement.</p> <p><i>Registered Historic Landscape</i></p> <p>The section of the proposed development in Gwynedd is entirely inside the Registered Dinorwig Landscape of Outstanding Historic interest. A full assessment of the impact on the historic landscape will need to be carried out using the Assessment of the Significance of Impacts of Development on Historic Landscapes (ASODOHL) methodology.</p> | | |
| Housing | <p>Issue that needs to be addressed</p> <p>The National Grid consultation PEIR Socio economic report paragraph 5.6.2 refers to the fact that the introduction of additional workers to this project may impact negatively on the communities within the study area.</p> <p>Whilst it is understood that the numbers of workers will fluctuate with the construction programme, it is anticipated that the main construction works are expected to take place over a four year period 2020 to 2024 and peak at around 400 workers. This coincides with the potential peak construction programme for the Wylfa Newydd project which is expected to be 2022 to 2024.</p> <p>The report also acknowledges that due to the nature of the construction work it will require specialist contractors, the majority of which will come from outside of the area.</p> <p>The demand on the housing sector at this time will be significant from the Wylfa Newydd Project and this additional demand could exacerbate an already strained housing sector.</p> <p>The consultation documents make reference to the fact that the majority of these construction workers would take up spare capacity in tourism accommodation, but it does not reference the fact that the Wylfa Newydd construction workers are likely to be competing for some of the same bedspaces.</p> <p>Evidence/Statistic</p> | WG 4.9 | <p>Tourism Accommodation is considered as a specific receptor in the assessment of socio-economic effects; assessment are described in sections 8 and 9 of Chapter 17 Socio-Economics (Document 5.17). The assessment includes consideration of the Private Rented Sector (PRS).</p> <p>In addition, potential effects on the wellbeing of vulnerable groups in connection with effects on housing are addressed in the Well-being Report (Document 5.27).</p> <p>Cumulative effects on the PRS are assessed in section 10 of Chapter 17 (Document 5.17).</p> |

| Table 4: Welsh Government | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>The Isle of Anglesey's Position Statement on the Wylfa Newydd's construction workers states that the demand for tourism accommodation may peak around 2022/24 with between 649 and 813 bedspaces required. Based upon the Council's recent bedspace survey this suggests that demand may exceed supply during the peak tourism season.</p> <p>Nature of Impact</p> <p>The impact is likely to put strain on the housing sector particularly in the Private Rented sector which may need to take up the slack if tourism accommodation is not available.</p> <p>Proposed means of addressing/mitigating Impact</p> <p>Contingency measures need to be in place to assist both the tourism sector and the housing sector cope with the demand.</p> <p>Relevant National/Local Planning Policy and/or WBFG Goal</p> <p>Overarching National Policy Statement for Energy (EN-1)</p> <p>Paragraph 4.1.3 – In considering any proposed development, and in particular when weighing adverse impacts against benefits the IPC [now Examining Authority] should take into account its potential benefits including any long term or wider benefits.</p> <p>Paragraph 4.1.4 – The IPC [now Examining Authority] should take into account social and economic benefits and adverse impacts, at national, regional, and local levels.</p> <p>Paragraph 4.2.3 – The ES should cover the environmental, social, and economic effects arising from pre-construction, construction, operation and decommissioning of the project.</p> <p>Paragraph 4.4.3 – it is intended that potential alternatives to a proposed development should, wherever possible, be identified before an application is made to the IPC [now Examining Authority] in respect of it (so as to allow appropriate consultation and the development of a suitable evidence base in relation to any alternatives.</p> <p>Paragraph 5.12.3 – The ES assessment should consider all relevant socio-economic impacts which may include the impact of a changing influx of workers during the different construction, operation and decommissioning phases of the energy infrastructure.</p> <p><i>Planning Policy Wales (Edition 9, November 2016)</i></p> | | |

| Table 4: Welsh Government | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>Paragraph 9.1.1 – The Welsh Government’s approach, set out in the National Housing Strategy is to:</p> <ul style="list-style-type: none"> • Provide more housing of the right type and offer more choice; • Improve homes and communities, including the energy efficiency of new and existing homes. | | |
| Welsh Language | <p>Issue that needs to be addressed</p> <p>There is currently no reference to matters regarding the Welsh Language within the consultation documents. Although we are aware that National Grid has commissioned Cadnant Planning to undertake a Welsh Language Impact Assessment, it is disappointing that the assessment does not form part of the overall consultation.</p> <p>Evidence/Statistic</p> <ul style="list-style-type: none"> • Source: 2011 Census • Increasing the Communities where Welsh is the main language 2013 <p>The number of communities in Wales where over 70 per cent of the population speaks Welsh has reduced significantly during the past decades - from 92 in 1991, 53 (6%) in 2001 to 39 (5%) in 2011. By 2011, every one of these electoral divisions (except one in Conwy) was in Gwynedd or Anglesey.</p> <p>Particular attention was given to the 70% threshold in certain areas and it was used as the basis of one of the targets in the Welsh Governments Welsh Language Strategy, Iaith Pawb (2003). Some academics believe it represented an irrefutable statistical turning point in relation to language use.</p> <p>In addition to out-migration, in-migration is also a key factor in the position of the Welsh language in higher percentage communities. A growth of 153,000 was seen in the population of Wales between 2001 and 2011, and the majority of that growth can be attributed to people who move in to Wales. This in-migration had an impact on the proportion of Welsh speakers living in Wales and on the higher percentage communities. Anglesey saw an increase of 3% (2,100) during this period. The Census results noted that in 2001, 60.1% of the residents of Anglesey were Welsh speakers. By 2011 the percentage had dropped to 57.2%. There are a number of contributing factors to this fall, but in-migration is one of them.</p> | WG 4.10 | <p>National Grid’s intention to produce a WLIA was clearly stated in the socio-economics chapter of the PEIR and the Scoping Report prior to that, providing an opportunity for stakeholders and the public to provide comments as part of the formal section 42 pre-application consultation process.</p> <p>The WLIA has been undertaken for National Grid by a North Wales based consultancy specialising in undertaking such assessments. Preparation of the WLIA was undertaken in parallel to the ES when the design was at a mature stage, drawing on detailed information such as the size, duration and make-up of the estimated workforce and associated likely significant socio-economic effects.</p> <p>The scope and approach of the WLIA was aligned with the relevant national and local guidance and discussed and agreed with IACC and Gwynedd Council through topic specific meetings to which Welsh Government were also invited. A draft WLIA was issued to IACC, Gwynedd Council and Welsh Government for comment ahead of submission.</p> <p>The WLIA (Document 5.26) considers the potential for in-migration as a result of the</p> |

| Table 4: Welsh Government | | | |
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| | <p>The Well-being of Future Generations (Wales) Act 2015 came into force in April 2016. The Act requires public bodies, including the Welsh Government, to think more about the long-term, to work better with people, communities and each other, look to prevent problems and take a more joined-up approach – helping us to create a Wales that we all want to live in, now and in the future. One of the Well-being goals and principles that underpin the Act, is ‘A Wales of vibrant culture and thriving Welsh Language’.</p> <p>Nature of Impact</p> <p>Current data as noted above clearly shows that the numbers of Welsh speakers are in decline mainly due to in migration and out migration. A reduction in the percentage of Welsh speakers is likely to affect language use on a daily basis. This project needs to take full consideration of the linguistic nature of the area of development and to consider how they will address the needs and issues of local residents, be that through the medium of Welsh or English, as well as how they intend to mitigate any negative effects on the language that could be incurred by this project.</p> <p>If not mitigated appropriately, the effects of this project could have a detrimental impact on the Welsh language and culture of Wales and would not be aligned with the Welsh Language Measure (2011), Future Generations Act 2013, Programme for Government 2016-21 and Draft Welsh Language Strategy 2017.</p> <p>Proposed means of addressing/mitigating Impact</p> <p>National Grid should;</p> <ul style="list-style-type: none"> • Ensure that a robust, evidence based Welsh Language Impact Assessment is carried out to address issues that include; socio economic factors, worker numbers / accommodation / profile, economic factors such as opportunities for local people and supply chains, education and skills • A mitigation strategy should be adopted in consultation with relevant stakeholders and should be supported at the highest level by the developer. The strategy should also set a clear action plan to include cost and timescales relating to the mitigation measures • Ensure that the developers communication strategy with stakeholders and local residents takes full consideration of the linguistic nature of the area of development. <p>Relevant National/Local Planning Policy and/or WBFG Goal (why it is a material planning consideration)</p> | | Project and associated effects and mitigation measures. |

| Table 4: Welsh Government | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p><i>Overarching National Policy Statement for Energy (EN-1)</i></p> <p>Paragraph 4.2.2 – [ES] information should show how any likely significant effects would be avoided or mitigated, and could include matters such as equality, community cohesion and well being.</p> <p>Paragraph 4.13.4 – new energy infrastructure may also affect the composition, size and proximity of the local population.</p> <p>Section 5.12 Socio-economic – should consider all relevant socio-economic impacts at a local and regional level, which may include changes to the local population dynamic and effects on social cohesion depending on how populations and service provision change as a result of the development.</p> <p>Paragraph 5.12.8 – The IPC [now Examining Authority] should consider any relevant positive provisions the developer has made or is proposing to make to mitigate impacts (for example through planning obligations) and any legacy benefits that may arise as well as any options for phasing development in relation to the socio-economic impacts.</p> <p><i>Wellbeing and Future Generations Act 2015 [Well being goals]</i></p> <ul style="list-style-type: none"> • A Wales of vibrant culture and thriving Welsh Language • A Wales of cohesive communities • A more equal Wales <p><i>Planning Policy Wales (Edition 8, January 2016)</i></p> <p>Paragraph 4.4.3 – contribute positively to the well-being of the Welsh language and ensure any negative impacts on the use of the language are mitigated.</p> <p>Paragraph 4.13.1 – the Welsh language is part of the social and cultural fabric of Wales. The Welsh Government is committed to ensuring that the Welsh Language is supported and encouraged to flourish as a language of many communities all over Wales.</p> <p><i>Technical Advice Note 20: Planning and the Welsh Language (2013)</i></p> <p>Paragraph 1.5.1 - In relation to the Welsh language and planning, the Equality Act 2010 and the Human Rights Act 1998 will be relevant and decision makers should be mindful of the wider legal implications.</p> | | |

| Table 4: Welsh Government | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>Paragraph 1.6.1 - Many people who have moved to Wales from other parts of the United Kingdom or elsewhere have learned the language and make a valuable contribution to the use of the language and the communities in which they now live.</p> <p>Paragraph 3.8.2 – Possible mitigation measures may include:</p> <p>Housing -</p> <ul style="list-style-type: none"> • Provision of affordable housing for local needs. <p>Employment -</p> <ul style="list-style-type: none"> • Local labour contracts and training initiatives. • Provision of bilingual signs within and outside the establishment. <p>Education -</p> <ul style="list-style-type: none"> • Support and funding for language induction and staff language lessons. • Support and funding for cultural and language initiatives/projects to encourage the use of the language within communities. • Support for the provision of school places in Welsh medium schools. • Support and funding for language and cultural awareness initiatives. | | |

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6 National Trust

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| Table 5: National Trust | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| NATIONAL TRUST AND PLAS NEWYDD | | | |
| | National Trust is a leading conservation charity with 4 million members. Established over 115 years ago, our primary statutory purpose is to promote the preservation of special places for the benefit of the nation. To achieve this aim we manage over a quarter of a million hectares of land, more than 700 miles of unspoilt coastline and estuary, several hundred historic houses, gardens and parks, and 6 World Heritage Sites. More than 100 million visits are made every year to the properties in our care. | NT 1.1 | This comment is noted. |
| | National Trust owns, cares for and provides public access to land and buildings on both sides of the Menai Straits. The Straits have a unique and highly significant combination of historic, scenic and ecological interests. Plas Newydd and Faenol represent a very important part of the tourism offer for North Wales and recognised as a highly significant environmental, heritage and economic asset. Plas Newydd was given to the National Trust by its owner, the 7th Marquis of Anglesey, in 1976, an occupied family home of some four hundred years. Plas Newydd is a special place that has become, and will continue to be, the 'special place' of many. | NT 1.2 | This comment is noted. |
| | National Trust is also a very important landowner to the emerging project at Wylfa Newydd, and at the northern end of the North Wales Connection Project. The North Anglesey estate constitutes 8 areas of tenanted property along the north coast with a total area of 482ha. The north coast is an historic and inspiring coastline. Cemlyn Bay itself is also a special place: a recognised site of international importance. | NT 1.3 | This comment is noted. |
| Q1. WYLFA SUBSTATION AND THE OVERHEAD LINE ON ANGLESEY | | | |
| | The preferred option is a subsea connection but National Trust accept the Strategic Options Report conclusions on routing options which dismiss the sub-sea cable connections to Deeside and Pembrokeshire. | NT 2.1 | This comment is noted. |
| | National Trust has remaining concerns about the emerging overhead line but does not wish to comment on any detail. National Trust comments are specific to its land ownership interests primarily relating to land in North Anglesey and in the Menai Strait at Plas Newydd and Faenol. | NT 2.2 | This comment is noted. |
| | Concern is expressed about the lack of detail relating to the emerging high voltage cable connections from the two Irish wind farm applications. Clarification of the status of the two additional schemes would be useful and their role in the Wylfa to Pentir considerations. The Need Case for the proposed scheme does identify the addition of 2GW from Codling Park and Greenwire | NT 2.3 | The updated Needs Case is presented as Document #. |

| Table 5: National Trust | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | wind generation and trigger the need for additional capacity across National Grid identified boundaries NW2 and NW3 by 2018. This timescale and geographic boundary lies outside the Wylfa to Pentir connection, with no details available at the current time on how the two schemes will connect to Pentir. | | |
| Q2. MENAI STRAIT AND RELATED EQUIPMENT | | | |
| | National Trust welcomes the tunnel solution as the preferred technology to cross the Menai Strait. National Trust recognises the benefits to the landscape and setting of the AONB, and to Plas Newydd and the Faenol estates in bringing forward this solution. | NT 3.1 | This comment is noted. |
| | <p>National Trust wishes to raise the following considerations.</p> <p>Further information is required prior to support for the principle of using the Braint Sealing End Compound as the main construction site. Further details are required on highways and transportation issues including consideration of a rail siding to reduce the impact of vehicle movements on Anglesey. Further detail on landscaping and visual impact is also required.</p> | NT 3.2 | <p>This comment is noted.</p> <p>The assessment of effects on the landscape are reported in Section 9 of Chapter 7 Landscape Assessment (Document 5.7 and visual in Chapter 8, Visual Assessment (Document 5.8).</p> <p>The transport effects associated with a CSEC at Braint are assessed in the ES Chapter 13 Traffic and Transport (Document 5.13) and the Transport Assessment (Document 5.3.2.1). The use of railways sidings has been considered but does not form part of the Proposed Development.</p> |
| | Concern about the proposed sealing end construction access onto Brynseincyn Road: Further consideration is required on vehicular access to the Braint Sealing End compound, including alternative road access and greater emphasis on rail delivery and waste removal. Further information is required on the landscape and visual impact of the construction of the access and visibility splay requirements. | NT 3.3 | <p>Transport, Scheme, Landscape, Visual</p> <p>Further consultation and meetings with National Trust have taken place (March and June 2017).</p> <p>The OCTMP (Document 7.5) outlines that the traffic to use this link is likely to be significantly reduced from that envisaged in the PEIR and the S42 scheme. This is reported in ES Chapter 13 Traffic and Transport (Document 5.13) and the Transport Assessment (Document 5.13.2). As part of the access strategy, it is proposed that the access onto Brynseincyn road is used</p> |

| Table 5: National Trust | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | <p>only for enabling works and for AIL movements. National Grid has put forward traffic management proposals that could, if agreed, reduce visibility splay requirements.</p> <p>The assessment of effects on the landscape are reported in Section 9 of Chapter 7 Landscape Assessment (Document 5.7) and visual in Chapter 8, Visual Assessment (Document 5.8).</p> |
| | Concern is raised about the risk of congestion during construction of the proposed tunnel and sealing end compound to Plas Newydd. Further discussion is required in relation to HGV construction movements on Brynseincyn Road. Further discussion is required in relation to LGV construction movements on Brynseincyn Road. Further discussion is required in relation to the timing of AIL movements into Anglesey and potential delays in visitor access to Plas Newydd. | NT 3.4 | <p>Transport</p> <p>National Grid have engaged with National Trust and have developed the OCTMP (Document 7.5) which outlines the proposed use of Brynseincyn Road as being for upfront enabling works, for limited AIL movements and for potential contingency use.</p> |
| | Potential delays could impact seriously on the National Trust business model with loss of income to the property at Plas Newydd. Income loss and traffic disruption would have a significant impact on the local economy as National Trust employ seasonal staff at the property. Any drop in income, also means less money to spend on conservation at Plas Newydd. The change in highway movements needs further consideration of detail by National Trust in relation to event management at Plas Newydd, thus needing further specific detail. | NT 3.5 | <p>The key junctions on the local highway network have been assessed for capacity and delay. This is reported in the Transport Assessment (Document 5.13.2.1)</p> <p>Comment noted and addressed in Chapter 17 Socio Economics, Sections 8 and 9 (Document 5.17); the National Trust property at Plas Newydd is included in the assessment of tourist attractions and recreational resources (see Appendix 17.1, Document 5.17.2.1).</p> |
| | Prior to further comment on Highways and Transportation issues, National Trust wish to consider the consultation response by Highway Authorities and North and Mid Wales Trunk Road Agency in relation to construction vehicle routing and junction capacity (particularly the key Tollhouse junction) on Anglesey and the implications for vehicle movements into Plas Newydd. | NT 3.6 | This comment is noted. |
| | Further information is required in relation to the Braint tunnel head house design. Further information is required in relation to Ty Fodol tunnel head house design in Gwynedd. | NT 3.7 | The tunnel shaft at Braint would be approximately 75 m deep and Ty Fodol approximately 95 m deep. Both shafts would |

| Table 5: National Trust | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | <p>have an internal diameter of 15 m. An illustrative shaft cross section is shown on Design Plan DCO_DE/PS/07 Sheet 2 of 2 (Document 4.13).</p> <p>Tunnel Head Houses would be constructed over both shafts. These would contain the typical equipment listed in Table 3.8 in Chapter 3 Description of the Proposed Development (Document 5.3). These would be installed over the shafts within the parameters shown on Design Plan DCO_DE/PS/09 Sheet 1 of 8 (Document 4.13) for Braint THH and Design Plan DCO_DE/PS/09 Sheet 5 of 8 (Document 4.13) for Tŷ Fodol THH. The sequence of events to construct the THHs would be construction of the building envelope, fit out and finish, installation of services and creation of hard and soft landscaping.</p> |
| Chapter 17 of the PEIR – Socio-economics | Concern is expressed about the potential economic implications for Plas Newydd during tunnel construction and lack of detail currently within the PEIR on the implications for tourism and visitors to Plas Newydd. There is a need for further information on tunnel construction, noise and vibration including background survey and a scheme of construction monitoring in relation to Plas Newydd and Faenol. | NT 3.8 | Comment noted and addressed in the ES Chapter 17 Socio-Economics, Sections 8 and 9 (Document 5.17); the National Trust property at Plas Newydd is included in the assessment of tourist attractions and recreational resources (see Appendix 17.1, Document 5.17.2.1) |
| | National Trust is satisfied that adequate information is provided within the PEIR in relation to National Trust assets at Plas Newydd and Faenol. | NT 3.9 | This comment is noted |
| | National Trust raises concern about the potential for blow out during construction of the tunnel under and into the Menai Strait, and wishes to see further specific information in relation to risk management, emergency procedures and full impact assessment prior to further consideration. | NT 3.10 | Measures to manage the risk of a Blowout of drilling fluid are set out in the CEMP (Document 7.4) and potential effects are assessed in Chapter 9 Ecology and Nature Conservation (Document 5.9). |
| Q3. OVERHEAD LINE IN NORTH | | | |

| Table 5: National Trust | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| GWYNEDD AND PENTIR SUBSTATION | | | |
| | If a rail facility not possible at the Braint Sealing End Compound, further consideration should be given to the extension of the proposed tunnel into the Pentir Substation, and also as a locus for tunnel construction activity. | NT 4.1 | This comment is noted, however extension of the tunnel into the Pentir Substation does not form part of the application. . |
| Q4. THE DEVELOPMENT OF THE PROJECT | | | |
| | National Trust welcomes the opportunity for further comment on the evolution of the scheme and opportunity to comment on the proposed scheme for the Menai Strait. National Trust would express concern about the current uncertainty in relation to vehicle movements and construction impacts on the tourist economy in Anglesey. National Trust welcomes the opportunity for further discussion on the risks of congestion to Plas Newydd. | NT 5.1 | issues related to congestion are considered in Chapter 13 Traffic and Transport (Document 5.13) and the TA (Document 5.13.2.1) and effects on tourist attractions are considered in Chapter 17 Socio-Economics (Document 5.17). |
| | National Trust welcomes further discussion on the risk to tourism on Anglesey, and potential schemes for tourism enhancement, mitigation and compensation. | NT 5.2 | This comment is noted. |
| | National Trust welcomes further discussion on the routing corridor of the proposed tunnel to enable the full implications for its land ownership at Plas Newydd and Faenol to be consideration. | NT 5.3 | This comment is noted. |

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7 Royal Society For The Protection Of Birds (RSPB)

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| Table 6: RSPB | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| North Wales Connection Project - Statutory Consultation under s42 of the Planning Act 2008 | <p>Consultation period 5 October to 16 December 2016</p> <p>Thank you for consulting the Royal Society for the Protection of Birds (the RSPB) over the above project proposal. With reference to the consultation documents, we have studied the contents and we wish to provide the following comments specifically relating to the Preliminary Environmental Information Report (PEIR).</p> <p>This response should be read alongside our previous response to the Stage 2 consultation submitted on the 10th December 2015 (copy attached).</p> | RSPB 1.1 | This comment is noted. |
| | <p>We recognise this is a large complex project and that studies are ongoing. However, there is a lack of detail in terms of ornithological baseline information, as winter bird surveys are still in progress. Therefore it is difficult to determine the levels of a range of impacts which may result from the proposal.</p> | RSPB 1.2 | <p>This comment is noted. The ES includes baseline information with the associated Appendices to Chapter 9 Ecology and Nature Conservation (Documents 5.9), notably Appendix 9.15 Ornithological Assessment Report (Document 5.9.2.15). These surveys were ongoing at the time of the PEIR. Survey data available at the time of issue were summarised within the PEIR document to keep the document to a manageable size.</p> |
| | <p>However, the PEIR does provide a summary of survey results and it does reveal that the proposed project area is important for a number of sensitive bird species, some of which are likely to be impacted by the scheme. We wish to inform you that Greenland white-fronted geese have established a small wintering population on Anglesey and we are aware that a small flock has occurred within your study area this winter. It is important that the presence and potential impact to this endangered subspecies is given full consideration in the Environmental Statement (ES).</p> | RSPB 1.3 | <p>This comment is noted and the species is discussed within the ES where relevant, with details of survey findings included within Appendix 9.15 Ornithological Assessment Report (Document 5.9.2.15).</p> |
| | <p>We are pleased to that see mitigation and enhancement measures are being explored, including the most effective ways of preventing electrocution of birds and reducing the risk of collision by birds. In addition to the measures identified, we reiterate the need to identify farmland managed under agri-environmental schemes which is a further opportunity to reduce the impact on waders and other ground nesting birds.</p> | RSPB 1.4 | <p>This comment is noted and agri-environment schemes have been discussed within the ES where data has been available for these schemes.</p> |
| | <p>Please note that the reference to priority species and habitats listed under Section 42 of the NERC Act 2006 used in the PEIR is out of date. It has been replaced by Section 7 of the Environment (Wales) Act 2016. In addition, the Birds of Conservation Concern in Wales: the population status of birds in Wales has been revised and recently published in Bird of Wales (Birds in Wales 13(1): 3-31). We recommend that future reports and documents incorporate these important changes.</p> | RSPB 1.5 | <p>This comment is noted and the ES includes these amendments.</p> |

| Table 6: RSPB | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | If you require further information in relation to this matter, including records of Greenland white-fronted geese, please do not hesitate to contact me. I would be grateful if you would keep me informed of any future developments | RSPB 1.6 | This comment is noted. Data was requested on a number of occasions from RSPB including for the Greenland white-fronted geese. The baseline report and ES chapter include the records provided. Details can be found within the Appendix 9.15 Ornithological Assessment Report (Document 5.9.2.15), and Chapter 9 Ecology and Nature Conservation (Document 5.9) |
| North Wales Connection Project. Stage Two Consultation: Wylfa to Pentir proposals | <p>The RSPB has the following comments to make in respect of the above consultation.</p> <p>We provide comments on the possible impacts of the scheme upon wildfowl, wading birds and other relevant species of bird; and appropriate mitigation to help inform the scope of the Environmental Statement (ES).</p> | RSPB 1.7 | This comment is noted. |
| | We acknowledge that the Orange Route Corridor is now the Preferred Route Corridor. We consider that the National Grid must demonstrate that there will be no significant adverse impacts from the development on statutory designated sites, and important populations of bird species of acknowledged conservation concern. | RSPB 1.8 | This comment is noted. The scheme has sought to avoid significant adverse impacts on ecological receptors, including on statutory designated sites and important populations of bird species of acknowledged conservation concern during the design process. Details can be found within the Chapter 9 Ecology and Nature Conservation (Document 5.9) and Habitat Regulations Assessment Report (Document 5.23). |
| Nature Conservation Importance of the Application Site (Preferred Route Corridor) and the Surrounding Area: | All statutory designated sites within and adjacent to the preferred route corridor have been identified, including those of international importance namely, Corsydd Mon/ Anglesey Fens Special Area of Conservation (SAC) and Y Fenai a Bae Conwy/ Menai Strait and Conwy Bay SAC. Natural Resources Wales (NRW) will be able to advise you further on matters regarding designated sites in the vicinity, including the details of Sites of Special Scientific Interest (SSSIs) and their features of interest. | RSPB 1.9 | This comment is noted and pre-submission engagement with NRW stakeholders included in the programme. |
| | The general vicinity along the route supports a small breeding population of curlews and lapwings, both of which are Red-listed in Wales (Birds in Wales 7: 39-91) and NERC 42 species. | RSPB 1.10 | This comment is noted and these species have been considered within the ES Chapter 9 Ecology and Nature Conservation (Document 5.9) and Appendix 9.15 Ornithological Assessment Report (Document 5.9.2.15). |

| Table 6: RSPB | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | There is a large resident population of feral geese on Anglesey, comprising of greylag and Canada geese. | RSPB 1.11 | This comment is noted and these species have been considered within the ES Chapter 9 Ecology and Nature Conservation (Document 5.9) and Appendix 9.15 Ornithological Assessment Report (Document 5.9.2.15). |
| | <p>Wintering wildfowl include whooper swans and a small number of Greenland white fronted geese (Red-listed in Wales and a NERC 42 species). Greenland White-fronted geese are declining and are of the highest conservation concern among the UK's geese and it is internationally listed:</p> <ul style="list-style-type: none"> • 'Endangered' in Global status (IUCN Red List of Threatened Species); • A2*; in the International Single Species Action Plan under the African-Eurasian Waterbird Agreement (AEWA) - (draft); • Annex 1 of the European Council Directive on the Conservation of Wild Birds (79/409/EEC), known as the 'Birds Directive'. | RSPB 1.12 | This comment is noted and these species have been considered within the ES Chapter 9 Ecology and Nature Conservation (Document 5.9) and Appendix 9.15 Ornithological Assessment Report (Document 5.9.2.15). |
| | The Menai Strait supports some sensitive species of bird. Notably, breeding common terns (Red-listed in Wales) and peregrine which is protected under Schedule 1 of the Wildlife and Countryside Act 1981 (as amended). | RSPB 1.13 | This comment is noted and these species have been considered within the ES Chapter 9 Ecology and Nature Conservation (Document 5.9) and Appendix 9.15 Ornithological Assessment Report (Document 5.9.2.15). The crossing of the Menai Strait would be via a tunnel. |
| Key Areas of Concern: | <p>In view of the above ecological interest, the development proposal has the potential to cause:</p> <ul style="list-style-type: none"> • direct habitat loss; • habitat fragmentation and/or modification; • disturbance/displacement of breeding birds and foraging wintering birds during construction and operation phases; • collision mortality/bird strike; • increased potential of predation of nests and young due to additional predator vantage points from structures and overhead cables. | RSPB 1.14 | This comment is noted and these effects have been considered within the ES Chapter 9 Ecology and Nature Conservation (Document 5.9). |
| Next Steps: | <p>Further to the North Wales Connection Project Briefing meeting held at Ty Menai on the 28th October, when we informed your ecologist of the bird interest in the vicinity of the preferred route corridor, we consider that the National Grid should carry out the following steps:</p> <ul style="list-style-type: none"> • Identify potential for local flight-lines being interrupted, and collision risk (with appropriate mitigation again where there is a risk, alone or cumulatively along the line). • Identify farms receiving payments under the Glastir Agri-environmental scheme for creating and managing habitats for ground nesting birds. These are advanced level species packages for | RSPB 1.15 | This comment is noted, and flight lines have been considered within the ES Chapter 9 Ecology and Nature Conservation (Document 5.9). Agri-environment schemes have been discussed within the ES where data has been available for these schemes, though it is for the Welsh Government to determine if alternative arrangements are required as Glastir is the |

| Table 6: RSPB | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>curlew and lapwing. If any such areas would be within approximately 400m of the pylons and overhead wires mitigation must be applied, such as the relocating of those habitats elsewhere within the farm boundary in places they are not likely to be adversely affected by the structures providing predator perches.</p> <ul style="list-style-type: none"> Please consider potential impacts on the whooper swan flock that forages immediately within Section 3 near Llangwyllog, where there is potential for displacement and/or collision risk. The large numbers of feral geese may be susceptible to collision risk through the length of the overhead route options | | sustainable land management scheme through which they offer financial support to farmers and land managers. |
| Mitigation / Compensation: | <p>As a number of options are under consideration within the preferred route corridor, it is not possible to discuss mitigation and compensation in detail. However, the broad headings under which the RSPB would be keen to discuss mitigation would be:</p> <p>a. Time-related restrictions on construction, in relation to nesting periods.</p> <p>b. The use of sympathetic land management</p> | RSPB 1.16 | This comment is noted and mitigation included in the ES Chapter 9 Ecology and Nature Conservation (Document 5.9) and BMS (Document 7.7). |
| Enhancement WITHOUT PREJUDICE: | In addition, it is the view of the RSPB that there is potential for enhancement. There is potential to enhance the biodiversity of the development site | RSPB 1.17 | This comment is noted and enhancement opportunities have been included where possible within the Enhancement Strategy (Document 7.13). |

8 Snowdonia National Park Authority

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| Table 7: Snowdonia National Park Authority | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>Thank you for the invitation to the respond to the consultation on the latest detailed design of the route of the North Wales Grid Connection.</p> <p>It is noted that for much of its length it will run overground, close to the existing connection.</p> | SNP 1.1 | This comment is noted. |
| | The National Park Authority has previously provided comments, see enclosure, during earlier consultations on the route of the connection and has expressed some concerns on National Grid's preferred option of overgrounding the route. | SNP 1.2 | This comment is noted. |
| | Whilst it is acknowledged that NG has made efforts to reduce the visual and landscape impacts on the Anglesey AONB; some concerns remain regarding the potential impact on the broader landscape setting of the Snowdonia National Park. The high mountains of Snowdonia are visible over long distances and provide a dramatic backdrop to views from Anglesey. The new overhead line, in combination with the existing route, has the potential, as is evident in some of the "route drive" animations, to harm the views of the mountains of Snowdonia and the hills of the Llyn AONB from many parts of the island. | SNP 1.3 | <p>The assessment of effects on landscape designations are reported in Chapter 7 Landscape Assessment (Document 5.7). This includes assessment of effects on Snowdonia National Park and makes reference to Appendix 8.2, Viewpoint Assessment (Document 5.8.2.2). Both the landscape and visual assessments have considered the potential impact of the Proposed Development with the existing overhead line being part of the baseline.</p> <p>Potential effects on views towards and from Snowdonia (as well as Anglesey AONB and the Llŷn AONB) have been be considered together with effects on setting.</p> |
| | The National Park Authority welcomes the proposals to underground the cables under the Menai Straits. | SNP 1.4 | This comment is noted. |
| National Grid North Wales Connection - Consultation Feedback. | Thank you for the invitation to the recent exhibition regarding the above at Canolfan Glaslyn, Porthmadog. In response to your invitation to provide feedback the National Park Authority Planning Committee at its meeting on 12/12/12 considered your preferred options and would like to make the following comments. | SNP 1.5 | This comment is noted. |
| | The Authority welcomes, and strongly supports. National Grid's preferred option of undergrounding the electricity transmission cables under the Glaslyn estuary as part of the North Wales Connection Project. | SNP 1.6 | This comment is noted. |

| Table 7: Snowdonia National Park Authority | | | |
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| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | The Authority would maintain that the justification for the original undergrounding of the route across the Glaslyn estuary the 1960's still holds. The views up the Glaslyn estuary towards the Snowdon massif, Cnicht and the Moelwynion are iconic and are appreciated by far greater numbers of visitors to the area than was the case 50 years ago. The Porthmadog bypass is used by many travellers on their way to the Llyn peninsula and the road affords excellent views of the mountains. In addition the Ffestiniog and Welsh Highland Railways and the Glaslyn Osprey Project are major attractions to Glaslyn estuary in their own right. | SNP 1.7 | This comment is noted. |
| | The Authority has some concerns on National Grid's preferred option of overgrounding the new overhead double circuit from Wylfa to Pentir. It would have preferred that the option of the undersea High Voltage Direct Current route from Wylfa to Deeside (as set out in our letter dated 16/11/2011). | SNP 1.8 | This comment is noted. |
| | Any overground route could impact adversely on the landscapes and designated areas of Anglesey such as the AONB. There is also the potential to affect the National Park's broader landscape setting - the high mountains of Snowdonia are visible over long distances and provide a dramatic backdrop to views from Anglesey. The new overhead line, in combination with onshore windfarms and individual wind turbines which are currently being proposed, has the potential to harm the views of the mountains of Snowdonia and the hills of the Llyn AONB from many parts of the island. | SNP 1.9 | <p>Potential effects on views towards and from Snowdonia (as well as Anglesey AONB and the Llŷn AONB) have been be considered together with effects on setting.</p> <p>The assessment of effects on landscape designations are reported in Chapter 7 Landscape Assessment (Document 5.7). This includes assessment of effects on Snowdonia National Park and makes reference to Appendix 8.2, Viewpoint Assessment (Document 5.8.2.2).</p> |

9 Amlwch Town Council

| Table 8: Amlwch Town Council | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | Having discussed the North Wales Connection Proposals on a number of occasions, Amlwch Town Council members strongly oppose erecting a second row of pylons and call on the National Grid to immediately seek other ways of transferring electricity from Anglesey. | This comment is noted. |
| | The erection of pylons will have long and short term environmental impacts, as well as having a negative visual impact on the island and potential negative effect on tourism and the economy. It is felt that a second row of pylons will also have a serious effect on the price of property and land. | The assessment of visual effects from the Proposed Development are presented in Chapter 8, Visual Assessment (Document 5.8). |
| | There are also concerns regarding the impact of the electro-magnetic field on health of individuals who live and work nearby. | Information about EMF is provided in the Electric and Magnetic Fields (EMF) Report (Document 5.25) |
| | As a Council we look forward to hearing from you in due course, and hope you will take into account the view of the local communities. | This comment is noted. |

10 Beaumaris Town Council

| Table 9: Beaumaris Town Council | | |
|---------------------------------|--|---|
| Consultee and Section Reference | Comment | How the comment has been addressed |
| | <p>Beaumaris Town Council welcomes the opportunity to contribute to this further stage of consultation on the new North Wales Connection across Anglesey. The Town Council have attended a briefing session and considered the details contained in the Project News document published in autumn 2016.</p> <p>The Town Council welcomes the steps that National Grid has already taken to minimise the impact of the new pylon line on the landscape of Anglesey. In particular it welcomes the adoption of a tunnel for the Menai Strait crossing and the willingness to site the sealing compounds and tunnel heads well back from the coast. The routing of the new line away from the existing line close to Llanfairpwllgwyngyll will avoid excessive impact on a sizable community.</p> <p>However the Town Council wishes to see further improvements to the plans.</p> | This comment is noted. |
| | <p>In considering National Grid's proposals Beaumaris Town Council has to give weight to the well being of the town which economically depends almost entirely on tourism. The jobs and economic benefits that Wylfa Newydd will bring are to be welcomed and the Town Council recognise that securing a reliable connection is an important part of that development. However tourism is a vitally important to Anglesey and its importance is growing. Anglesey, with its varied tourism offering, is particularly well positioned to benefit from expected future growth of the domestic tourism market as increasing numbers of international destinations become unavailable. A key attraction of Anglesey is its largely rural, quiet and undeveloped character which, particularly for visitors from urban areas, contributes to a strong sense of 'getting away from it all'. We must be careful that support and encouragement of one industry (power generation) is not at the expense of another (tourism) by fatally undermining that undeveloped character of the island.</p> | <p>Chapter 17 (Document 5.17) takes a multifaceted approach to assessing potential socio economic effects of the Proposed Development on tourism and includes:</p> <ul style="list-style-type: none"> the consideration of individual receptors (such as tourism businesses, tourist attractions, recreational resources and PRow), assessing the potential effects on them arising from visual, noise, air quality or traffic and transport impacts, in isolation or in combination. the assessment of potential effects on the availability of tourism accommodation as a result of construction worker demand. the assessment of potential effects on labour availability in the tourism sector. the assessment of potential effects on the wider tourism sector that could result from changes in visitors' behaviours or perceptions of the area. This has informed by the outputs of a bespoke Visitor Behaviour Survey. |
| | <p>The tourist industry of Anglesey is not just restricted to the coast. A very quick search found half a dozen significant holiday locations close to the proposed route. It is difficult to believe that Do Anglesey Cottages in Capel Coch or Beudy'r Garnedd near Star (which is virtually under the proposed route and within a few hundred meters of three pylons) will not have their businesses affected. A double line of pylons cutting a swathe across the countryside on the</p> | <p>Chapter 17 Socio Economics (Document 5.17) assesses potential socio-economic effects of the Proposed Development on tourism and includes consideration of individual receptors, such as tourism businesses, assessing the potential effects on them arising from visual, noise, air quality or traffic and transport impacts, in isolation or in combination. The assessment also considers potential effects on the wider tourism sector that could result from</p> |

| Table 9: Beaumaris Town Council | | |
|---------------------------------|--|--|
| Consultee and Section Reference | Comment | How the comment has been addressed |
| | doorstep of a holiday cottage will erode the sense of 'getting away from it all' that is so attractive to visitors and will put future tourism business at risk. | changes in visitors' behaviours or perceptions of the area. This has been informed by the outputs of a Visitor Behaviour Survey. |
| | The Town Council recognises the fact that by opting for a tunnel under the Menai Strait you have to a degree recognised how important the visual landscape of Anglesey is to its economic well being. However, the Council is disappointed that the option that has the least impact on the well being of Anglesey, underground cables, has been comprehensively rejected. It is also disappointed that in proposing an overhead pylon line the option to reduce visual impact of two rows of pylons by adopting a more compact design has been ignored. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| Underground Cabling | <p>There is some merit in National Grid's view that placing the new line closely parallel to the old line reduces the visual effect. This approach clearly avoids spreading the visual impact over a wide area of Anglesey. However it does mean that the double line has an intense impact on particular locations.</p> <p>For example your own 'drive through' video in the Talwrn area shows that the double line creates a discordant industrial "wirescape" in what is otherwise a rural environment.</p> | The assessment of visual effects from the Proposed Development are presented in Chapter 8, Visual Assessment (Document 5.8). |
| | <p>The Town Council remains of the view that for reasons of protecting the visual character of Anglesey placing the new line underground is the better option.</p> <p>The Town Council accepts that underground cables are a more expensive option. However, they believe that National Grid have not placed enough weight on the economic impact of a visible pylon line. Even a small negative impact on the £250 million per year tourism industry of Anglesey could run to many tens of millions of pounds over the lifetime of the new power station.</p> | <p>This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1)</p> <p>Chapter 17 (Document 5.17) assesses potential socio-economic effects of the Proposed Development on tourism and includes consideration of individual receptors, such as tourism businesses, assessing the potential effects on them arising from visual, noise, air quality or traffic and transport impacts, in isolation or in combination. The assessment also considers potential effects on the wider tourism sector that could result from changes in visitors' behaviours or perceptions of the area. This has informed by the outputs of a bespoke Visitor Behaviour Survey.</p> |
| | <p>National Grid's decision is particularly disappointing given the willingness of National Grid to put other connectors underground:</p> <ul style="list-style-type: none"> • 33 km of high voltage cable is being run underground across the Wirral as part of the Western Link project • 8 km of the Hinkley Point C connection will be underground as it crosses the Mendip Hills AONB. We note that part of the justification was protection of | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |

| Table 9: Beaumaris Town Council | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | <p>views from valued locations and views from a long distance cycleway of national value. These arguments apply just as much on Anglesey. The new pylons will damage many spectacular and valued views from Anglesey towards the mountains of Snowdonia including those from a National Cycleway (route 8).</p> <ul style="list-style-type: none"> • A stretch of pylons between Portmeirion and Llyn Trawsfynydd is being removed and replaced by an underground cable. • 13km of new underground cable is being installed through the Meifod Valley in Powys. | |
| | <p>The Town Council is not convinced by National Grid's assertions about the cost of underground cables. An independent report¹ commissioned by The Campaign to Protect Rural England, Campaign for National Parks and The National Association for AONBs highlights that the National Grid's estimated costs seem to be greater than those actually incurred by other distributors. In particular the study reported that transmission operators in Denmark and Germany have found that the investment cost ratio is 2-5 to 1 rather than the 10-20 to 1 often quoted by National Grid. In addition National Grid appears to downplay the fact that because underground cables are more reliable some of the additional outlay can be recouped through reduced maintenance.</p> | <p>This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1)</p> |
| Pylon Design | <p>The Town Council is disappointed that National Grid proposes to use a large lattice design pylon for the new line. While there is some logic to the decision to match the existing pylon design the Town Council feel that this is the wrong decision.</p> | <p>This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1)</p> |
| | <p>Minimising visual impact has to be a priority. The Town Council are of the opinion that the new pylons should be of a low profile design. A double line of dissimilar pylons will be no more intrusive than a double line of similar pylons. By using a low profile design for the new pylons National Grid will be reducing the visual impact of the new line which, while not as good as going underground, would go some way to addressing people's concerns about visual intrusion.</p> | <p>Through the design process and as discussed in the Design Report (Document 7.17) thought was given to the type of pylon and how they would look alongside the existing overhead line.</p> <p>The assessment of visual effects from the Proposed Development are presented in Chapter 8, Visual Assessment (Document 5.8).</p> |
| | <p>This is illustrated by your own interactive view point at Star. Lower pylons would be less likely to break the horizon when looking towards the south and will</p> | <p>A section of the proposed overhead line near Star has been identified for low height pylons to address these issues. This can be seen in the wireframe illustrations which are presented alongside the viewpoint photographs in</p> |

¹ An independent evaluation report for the costs of underground high voltage cables in Great Britain published December 2010.

| Table 9: Beaumaris Town Council | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | therefore have less of an impact on the extensive views towards Snowdonia than the taller pylons illustrated. | Appendix 8.2, Viewpoint Assessment (Document 5.8.2.2) and in the Photomontages which are presented in Document 5.29 . The assessment of visual effects from the Proposed Development are presented in Chapter 8, Visual Assessment (Document 5.8). |
| | The recently approved 'T' design would be ideal. If National Grid are insistent on matching the existing lattice design one of the low profile lattice designs should be used such as that chosen for the Richborough connection. | Through the design process and as discussed in the Design Report (Document 7.17) thought was given to the type of pylon to be used. |
| Undersea Option | <p>The Town Council has always believed that a sub-sea cable is the best option. Even at this late stage the Council urges National Grid to reconsider its stance. The Western Link project provides a 385km long 2.2 GW High Voltage DC link through the Irish Sea for a reported cost of £1bn which also includes on-shore underground cables and converter stations. An offshore link along the North Wales coast would be around a third of the length and therefore significantly cheaper. A funding review report² of the link included comparison costs for similar sub-sea links. One between Sardinia and Italy appears to be about 75% of the cost of the Western Link.</p> <p>These figures make a mockery of National Grid's assertion that sub-sea would be 'many hundreds of millions of pounds more expensive' than the preferred alternatives.</p> <p>Given that the current proposals include £150 million for the tunnel under the Menai Strait the Town Council feel that the economics in favour of the undersea option are now more favourable.</p> | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | <p>In addition the Town Council has not been convinced by National Grid's argument that a sub-sea connection would be less resilient than an on-land option. The existing pylon line will remain to provide independent back-up transmission capacity to a sub-sea cable. The decision to route the new line close to the existing line means that they are both vulnerable to a single incident which increases the risk that all connection for Wylfa B will be lost.</p> <p>The Town Council call on National Grid to review its rejection of the sub-sea option.</p> | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |

² Western HVDC Final Funding Review. Report to Ofgem. April 2012

11 Campaign For The Protection Of Rural Wales

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| Table 10: Campaign for the Protection of Rural Wales | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | We made a detailed response to the 2012 and 2015 Consultations, arguing against an overhead route across Anglesey between Wylfa and Pentir and in favour of a sub-sea option direct from Wylfa to Deeside. We continue to oppose an overhead route and argue for a direct sub-sea route, or at the least a fully underground route. We do not consider that National Grid's position adequately supports dismissal of the sub-sea route and we are disappointed that our earlier arguments have still not been addressed. | This comment is noted. |
| | Nevertheless, we recognise that National Grid is making considerable efforts to mitigate the visual impact of the proposed overhead route, including in particular options to cross the Menai. We have some comments on these proposals, were they to go ahead. | This comment is noted. |
| Anglesey Corridor | | |
| | We note that much of the proposed new line of pylons would run parallel to (within 100m of) the existing line. Where possible pairs of old and new pylons would be aligned, while the same style of pylon design would be retained. This approach at least avoids introducing landscape blight in a completely new corridor and will to some extent limit the incremental visual impact. | This comment is noted. |
| Menai Crossing | | |
| | We welcome the proposal to place the new lines in a 4 km tunnel under the Menai, limiting any visual impact both on the Strait and adjacent particularly high value landscapes, including the Anglesey AONB, Plas Newydd and Faenol Park. We recognise that a careful and detailed analysis of the many options has been made. We note the design option proposed (C or G with an outline cost of £170-220mn) would be the most technically complex and expensive of the seven considered and 'reduces the potential for environmental effects against a number of considerations, although there is still the potential for significant effects'. The route proposed is the more central one (broadly 5C/5G) of the four originally considered. The proposed cable sealing end compounds (CSECs) would be located, respectively, on the eastern edges of the 'Anglesey Central' (AN6) and 'Gwynedd South' (GS1) search areas considered earlier. It is noted that preferences expressed in the earlier consultation allowed | This comment is noted. |

| Table 10: Campaign for the Protection of Rural Wales | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | two route options to be discounted (5A/5H); there was some preference for 5D/5E and 'Anglesey North' and for 5G/'Gwynedd South', both partly on landscape and visual grounds, but there was no definitive outcome. Anglesey South would require a longer section of new overhead line deviating from the route of the existing line. | |
| | <p>The proposed Anglesey CSEC site (Braint) is alongside a narrow access road to Tyddyn Fadog in an area of open, gently rolling farmland, about 700m NW of the Brynsiencyn Road and the northern section of the Plas Newydd grounds, 900m south of the A55 west of Llanfair PF and about 1200m NE of Bryncelli Ddu. Existing woodland belts and coverts break up sightlines to some extent. Although outside the AONB, it is within the proposed locally designated Southern Anglesey Estatelands SLA. There is also potential to affect views north from Bryn Celli Ddu. Glimpses of the connecting new overhead line are likely from the Wales Coast Path. Impact on the setting of Plas Newydd would be limited.</p> <p>The Gwynedd site (Ty Fodol) is in open farmland on the plateau on the east side of the A4087 on a minor road (Ffordd Fodolydd), about 500m SE of the Faenol roundabout and 1200m NW of the Pentir substation. It would be largely concealed from nearby major roads by terrain or woodland belts. It is stated not to be visible from the A487 coming down from the A55 junction to the Faenol roundabout. There would be little or no impact on the Faenol Estate and Surrounds.</p> <p>These sites are generally acceptable to us in terms of their wider landscape impact.</p> | This comment is noted. The assessment of effects on landscape receptors are reported in Chapter 7 Landscape Assessment (Document 5.7) and visual receptors in Chapter 8, Visual Assessment (Document 5.8). |
| | <p>The main issue for us is the appearance and visibility of the CSECs. These are understood to cover an area of about an acre and contain structures up to 20m height, including a 7m high tunnel headhouse. We look for close attention to be paid to the design of the CSECs to minimise their visual impact, as well as planting of intensive belts of fast growing trees to screen these sites effectively. We would also expect to see visualisations from various vantage points as part of a formal Landscape Impact Assessment. We note there may be</p> | <p>The design has looked to minimise the size of the structures required and an assessment of effects on general public visual amenity, from publically accessible places has been completed and the results are reported in Chapter 8, Visual (Document 5.8). Figures 7.14-7.15 Landscape Mitigation Proposals (Document 5.7.1.12-5.7.1.15) present more detailed information on specification of proposed mitigation planting for the CSEC/THH locations.</p> <p>A Design Guide (Document 7.19) provides more detail on the appearance of the THH locations at Braint and Ty Fodol.</p> |

| Table 10: Campaign for the Protection of Rural Wales | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | opportunities to use lower height pylons to limit the impact of connecting overhead cables. | A section of the proposed overhead line near Star has been identified for low height pylons. This can be seen in the wireframe illustrations which are presented alongside the viewpoint photographs in Appendix 8.2, Viewpoint Assessment (Document 5.8.2.2) and in the Photomontages which are presented in Document 5.29 . |
| | The tunnelling would generate a large amount of excavated material. We did not see details of proposed arrangements for its transport and disposal and would appreciate clarification of this. | The ES Chapter 13 Traffic and Transport (Document 5.13) and the Transport Assessment (Document 5.13.2.1) detail the vehicle movements associated with excavated material. |
| | Four pylons would be required to complete the overhead connection between the SEC and an enlarged Pentir substation. This would create further regrettable impact on an area which is already visually blighted by several other converging lines of pylons, despite being within the Dinorwig Landscape of Outstanding Historic Interest. | The assessment of effects on landscape receptors are reported in Chapter 7 Landscape Assessment (Document 5.7) and visual receptors in Chapter 8, Visual Assessment (Document 5.8). |
| | It is understood there are good technical reasons why the new cables could not use Pont Britannia to cross the Strait, but we regret that the opportunity has been lost for considering diversion of the existing overhead cables now crossing at Pont Britannia and combining them with the new cables in the proposed sub-Menai crossing. These will continue to cause visual damage to this stretch of the Menai. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | We note that Welsh Government ministers have recently stated that the new cables should be combined with a proposed third Menai road crossing, whether bridge or tunnel. This would clearly require reconsideration of cabling proposals, depending on the location and type of road crossing proposed. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| CPRW, CONWY BRANCH | <p>Section: Q2. The tunnel underneath the Menai Strait and related equipment</p> <p>Question: Have you any comments on the proposals or are there any changes you think we can make to further reduce the effects? Please tell us and, importantly, please tell us why.</p> <p>If your comments are about a specific part(s) of the tunnel proposal, please use the tick boxes below</p> | This comment is noted. |

| Table 10: Campaign for the Protection of Rural Wales | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | <p>Anglesey sealing end compound</p> <p>Anglesey tunnel head house</p> <p>Gwynedd sealing end compound</p> <p>Gwynedd tunnel head house</p> <p>Tunnel route</p> | |
| | <p>Question: Have you any comments on the proposals or are there any changes you think we can make to further reduce the effects? Please tell us and, importantly, please tell us why. If your comments are about a specific part(s) of the tunnel proposal, please use the tick boxes below</p> <p>We supported the sub-sea proposal and still believe it would be best solution. Our concern is with all above ground structures including roads, enclosures, sub walling etc. It is crucial for you to include full details for these with your application as the Menai Straits is a protected and invaluable natural asset. The sitting and design will be crucial and requires professional landscape architectural input from the earliest stages. Planting and screening is merely cosmetic.</p> | <p>This comment is noted.</p> <p>The Design Report (Document 7.17) describes the evolution of the Proposed Development and demonstrates that minimising harm to the landscape through sensitive routeing, siting and design was a major consideration during its development.</p> <p>For the CSEC and THH locations, a Design Guide (Document 7.19) provides information on the design for the built form and surrounding landscape at these locations. Figures 7.14-7.15 Landscape Mitigation Proposals (Document 5.7.1.14-5.7.1.15) present more detailed information on specification of proposed mitigation planting.</p> |
| Anglesey Branch of CPRW Response to National Grid's Final Route Wide Consultation between Wylfa and Pentir (Section 42) | 1. We object to National Grid's plans to erect more electricity pylons and overhead cables in Anglesey's unique landscape, which is internationally recognised for its rich cultural and outstanding geological heritage and its natural beauty. | This comment is noted. |
| | 2. We support the position adopted by Anglesey's Community Councils as communicated to National Grid by their collective voice 'One Voice Wales'. | This comment is noted. |
| | 3. We support the County Council, and all the local elected representatives including our Assembly Member and Member of Parliament, when they say that <i>"no additional overhead electricity transmission lines and pylons should be constructed across Anglesey"</i> | This comment is noted. |

| Table 10: Campaign for the Protection of Rural Wales | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | <i>or the Menai Strait, due to serious concerns about the impacts which will arise from such development."</i> | |
| | 4. We do not consider that National Grid is in a position to proceed with the submission of plans for a Development Consent Order (DCO), as it has failed to address the many objections and concerns raised by the local community and the statutory and non-statutory national and international protections required for Anglesey's landscape. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | 5. National Grid has manipulated the process of consultation and has ignored the responses from the local community to suit a cheap, outdated, pre-conceived and unimaginative plan to erect a second line of pylons. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | 6. It has contrived to suggest that this overland route is the most efficient way to transmit power from the north of Anglesey to the mainland at Deeside. When clearly the shortest, most efficient and obvious route would be via sub-sea cable. Anglesey, like the UK mainland, is an island i.e. surrounded by sea. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | 7. National Grid has lauded the benefits of sub-sea interconnectors when it expands its business model and profits the company. For example it has pushed plans for interconnectors as part of its EU ENTSO-E plans for a Europe-wide Grid, and particularly where it enables the company to expand into the energy generation sector (i.e. the UK's Capacity Market) and thereby receive millions of pounds of public subsidy for the building and operation of sub-sea transmission links connecting to power generation plants overseas. However National Grid has not been prepared to spend some of the record-breaking profits thereby achieved in recent years on R&D and innovative planning, so as to facilitate the least damaging transmission developments here in Wales. This duality, indeed some would say duplicitous, approach by National Grid is not acceptable and has resulted in flawed and damaging plans for developments on Anglesey. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | 8. National Grid originally suggested that either a HVDC or AC sub-sea connection was possible for the transmission of power from Wylfa Newydd. However it did not thoroughly research this option, | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |

| Table 10: Campaign for the Protection of Rural Wales | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | <p>nor use the time well between 2010 and 2015, when it was known that the Wylfa site, like other coastal nuclear power sites in the UK, would retain a licence for a new nuclear plant, and that, subject to a Generic Design Assessment (GDA) such a development would be supported by Government. As a result of National Grid's lackadaisical approach the company has now cursorily dismissed any type of sub-sea option on cost grounds or as presenting "technical challenges". This is not an acceptable outcome from a company that has been entrusted with the most important element of national infrastructure as far as the security, economy and well-being of Wales and the UK is concerned. Furthermore National Grid has been allowed to operate this infrastructure as a monopoly business, despite the obvious potential for conflicts of interest. It is clear that there are both legal and moral reasons why National Grid should have engaged at the earliest opportunity with the local community, Hitachi, Natural Resources Wales and the Welsh and UK governments, to highlight any technical issues which it now says prevent the company bringing forward plans for the most obvious and efficient transmission route, i.e. via sub-sea interconnectors. It should then have planned to resolve any technical issues. If such technical issues were insurmountable, then every effort should have been made to produce an alternative scheme that would not damage Anglesey.</p> | |
| | <p>9. It is self-evident from the documents put into the public domain, that National Grid has provided insufficient detail in its current proposed plans. The EIA is incomplete, the outline routes are too vague, impacts on the landscape, tourism, residential amenity, natural resources and bio-diversity features are barely alluded to and sometimes ignored completely. The planned structures are only vaguely described. For example, the lattice pylons are described as "typically 47 metres", and statements like "it will be necessary to remove some trees", and "we tried to avoid encircling properties" are part of what purport to be 'plans' presented for comment and scrutiny. The 'drive through' digital animation visualisations are nothing like the real landscape they are intended to represent. A good animation filmmaker could produce a more detailed and factually correct representation. These digital images have also been sanitised by the removal of visual elements and information. For example, views of existing wind turbines in the north of the island have been excluded</p> | <p>This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1)</p> |

| Table 10: Campaign for the Protection of Rural Wales | | |
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| | <p>and thus the cumulative impact of the pylons and cables on the landscape appears to be less significant than it would be in reality. The 'drive through' visualisations have embellished the sense of screening and vegetation by, for example, depicting high hedgerows, even where there are none or where there are low stone walls, and by placing trees where none exist in reality. Consequently it is very difficult to assess the impact on the totality of Anglesey's landscape, let alone on individual localities. All this is highly relevant given Anglesey's comparatively flat and open landscape. Because of the lack of information and the kind of information provided it is not possible to judge these proposed plans accurately against the law or Welsh planning policy or guidance, except in a very general way. This is what Anglesey County Council has endeavoured to do, whilst still reserving its position without prejudice. We support the County Council in its approach and we share the County Council's numerous valid concerns.</p> | |
| | <p>10. We consider that the planning applicant (i.e. National Grid) should make funding available to the County Council and additionally to Community Councils to enable them to properly consider what is being proposed, i.e. the second largest development on Anglesey. It is a development which will have a detrimental impact on the entire County throughout the lifetime of Wylfa Newydd and clearly, in view of National Grid's proposal to retain the existing pylons, it will impact the future economic, environmental and social well-being of Anglesey for many generations to come.</p> | <p>This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1)</p> |
| | <p>11. We consider that National Grid has treated the local community with contempt as it has been very selective in choosing the extent to which public responses to previous consultations have been put into the public domain. National Grid has selectively quoted from responses and obscured and sanitised the true nature of the concerns to make it appear as if the local community condone National Grid's plans for a second line of pylons, albeit wishing to see certain particular improvements. Our members have attended meetings with National Grid who have given the clear impression that there is no option for local people other than to suggest minor changes. Any new or different approach to National Grid's chosen</p> | <p>This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1)</p> |

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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | method of transmission will not be countenanced. Only a legal challenge will deliver any substantial change to the plans. | |
| | 12. We know how strongly our members and the wider community objects to these plans. And while the wider community has sometimes very different strongly held opinions about other energy developments on Anglesey there is a unanimous sentiment against the erection of more damaging electricity pylons. We consider that National Grid should now come forward with plans to remove the existing pylons, as it has in other sensitive designated landscapes. | This comment is noted. |
| | 13. We are finding that local support for Wylfa Newydd is being eroded by the plans being put forward by National Grid. The economic advantages to Anglesey of a new nuclear power station have to be balanced with the economic, environmental and social costs of both the power station and its associated infrastructure. There is a growing feeling that the balance is now being tipped towards there being more harm than good. | This comment is noted. |
| | <p>14. National Grid has taken no account of the existing Ynys Mon Local Plan and its policies for landscape protection, especially policy 31 which is intended to protect the 'Special Landscape Area' i.e. all of Anglesey's interior countryside:-</p> <p>Extract f r om Ynys Mon Local Plan</p> <p><i>"4.26 The Council considers that all parts of Ynys Mon have special landscape qualities. The conservation of natural beauty should be the overriding objective in Areas of Outstanding Natural Beauty and along the Heritage Coast.</i></p> <p>POLICY 31. LANDSCAPE</p> <p><i>With the exception of the AONB, and that land which falls within the settlement boundaries as defined in the Plan, the island is designated as a Special Landscape Area.</i></p> <p><i>Proposals for development in the Special Landscape Area will be expected to have particular regard to the special character of their surroundings.</i></p> | The Joint Local Plan was revised in 2018, removing the all island Special Landscape Area (SLA) and focuses the SLA designation on those areas of particular importance. The assessment of effects on landscape designations are reported in Chapter 7 Landscape Assessment (Document 5.7). |

| Table 10: Campaign for the Protection of Rural Wales | | |
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| | <p><i>In considering the landscape impact of any proposal, the Council will need to be satisfied that the development can be fitted into its surroundings, without unacceptable harm to the general landscape character, before planning permission is granted. "</i></p> <p>This Local Plan is still the current plan and until it is replaced it will have statutory force.</p> | |
| | <p>15. National Grid has taken no account of the UNESCO Global Geopark landscape designation awarded to the whole of Anglesey. In November 2015 UNESCO advised us that</p> <p><i>"The UK Government and the UK National Commission for UNESCO have supported the process for Global Geoparks to become part of a formal UNESCO programme.</i></p> <p><i>During the 38th session of UNESCO's General Conference in 2015, the 195 Member States of UNESCO ratified the creation of a new label, the UNESCO Global Geoparks. This expresses governmental recognition of the importance of managing outstanding geological sites and landscapes in a holistic manner, and also provides a new international status to a former network of sites of geological significance,</i></p> <p><i>UNESCO Global Geoparks are single, unified geographical areas where sites and landscapes of international geological significance are managed with a holistic concept of protection, education and sustainable development."</i></p> <p>This prestigious designation is one of only 120 in the world. It is in recognition of Anglesey's unique and rich geological landscape and the natural resource that supports the local biology and eco-systems and has given rise to the environmental character and cultural heritage of Anglesey. The UNESCO designation also confers a huge opportunity to extend the island's tourism offer. However a landscape blighted from end to end by 47 metre pylons will undercut that unique tourism offer and appeal. Therefore the plan for more pylons will damage both the landscape and economy of Anglesey.</p> | <p>The Geopark designation focuses on geological heritage and the associated geo-tourism and is discussed in Chapter 11, Geology, Hydrogeology and Ground Conditions (Document 5.11) and Chapter 17, Socio-Economics and Tourism (Document 5.17).</p> |

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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | <p>16. National Grid has taken no account of Planning Policy Wales and Technical Advice Note 12. The following quoted paragraphs from TAN12 make clear why it is important so to do:-</p> <p><i>2.1 The design of our villages, towns, cities and the urban and rural landscape is important in articulating our nation and our culture. Design is important to our quality of life, and the quality of Wales' varied landscape and townscapes - helping to sustain a positive image for Wales.</i></p> <p><i>2.4 Design is defined in PPW as:</i></p> <p><i>"the relationship between all elements of the natural and built environment. To create sustainable development, design must go beyond aesthetics and include the social, environmental and economic aspects of the development, including its construction, operation and management, and its relationship to its surroundings."</i></p> <p><i>PPW emphasises that:</i></p> <p><i>"Good design is also inclusive design. The principles of inclusive design are that it places people at the heart of the design process, acknowledges diversity and difference, offers choice where a single design solution cannot accommodate all users, provides for flexibility in use, and, provides buildings and environments that are convenient and enjoyable to use for everyone."</i></p> <p><i>2.5 Good design is not inevitable. It requires a collaborative, creative, inclusive, process of problem solving and innovation - embracing sustainability, architecture, place making, public realm, landscape, and infrastructure.</i></p> <p><i>2.6 Design which is inappropriate in its context, or which fails to grasp opportunities to enhance the character, quality and function of an area, should not be accepted, as these have detrimental effects on existing communities.</i></p> <p><i>3.4 Particular attention should be focused on engaging end users and stakeholders in the design process from the outset, and throughout the entire process, as a means of fostering a sense of</i></p> | <p>The Design Report (Document 7.17) describes the evolution of the Proposed Development and demonstrates that minimising harm to the landscape through sensitive routeing and design was a major consideration during its development. Matters relating to planning policy are discussed in the Planning Statement (Document 7.14).</p> |

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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | <p><i>ownership and consensus, which will be important to the long-term success of a project.</i></p> <p><i>4.1 Design is a process of analysis and synthesis: analysing, identifying and diagnosing problems and barriers, then solving them through critique, research, development and testing. Design is a creative means by which to realise innovation and add value. Design for the built environment plays a key role in economic growth and in raising the quality of the places where we live and work.</i></p> <p><i>4.3 The local context comprises the characteristics and setting of an area in which a development is located. This includes the area's natural and human history, the forms of settlements, buildings and spaces; its ecology and archaeology; its location and the routes and waterways that pass through it. Understanding the site and its immediate and wider context is the basis for a meaningful and sustainable design response, and is the responsibility of all those involved in the design process, particularly planning applicants and their agents and those formulating and implementing design policy and guidance. Further guidance on appraising context can be found in Site & Context Analysis Guide: Capturing the value of a site.</i></p> <p><i>4.5 In many cases an appraisal of the local context will highlight distinctive patterns of development or landscape where the intention will be to sustain character. Appraisal is equally important in areas where patterns of development have failed to respond to context in the past. In these areas appraisal should point towards solutions which reverse the trend.</i></p> <p><i>4.11 Appraisal of the landscape should focus on its quality in terms of geology and geomorphology, vegetation and habitats, visual and sensory quality and historic and cultural quality. "LANDMAP" is one method of assessment which has the potential to provide a framework and information base from which good design and management can be developed. Similar assessments are available to measure the quality of the 'seascape'. These identify what areas, characteristics and qualities are important to conserve at a time when our coastal areas face many pressures from new developments. Historic Landscape Characterisation provides a more detailed level of assessment for the historic environment, and studies have been</i></p> | |

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| | <p><i>carried out for all of the areas included in the Register of Landscapes of Historic Interest in Wales. Further detailed site appraisals may also provide information on local hydrology, microclimate, soils, plant communities and features, and all visual qualities including views and vistas.</i></p> <p><i>5.8.1 The special qualities of the rural landscape and coastline of Wales should be recognised. The qualities should be enhanced through conservation of the character of the countryside and by achieving quality in new development.</i></p> <p><i>6.17 It is a statutory requirement that certain applications for planning permission and listed building consent are accompanied by a design and access statement (DAS). Further guidance relating to the requirement for a DAS can be found in guidance produced by the Welsh Government and Design Commission for Wales.</i></p> | |
| | <p>17. CPRW concludes that National Grid has taken little account of the early non-statutory public consultations. We conclude that National Grid's current plans will damage the local economy, which throughout the last century and up until now has been largely reliant on tourism. Following the closure of Anglesey Aluminium and Wylfa A, tourism has become even more essential to the local economy and has provided the largest number of private sector jobs. Wylfa Newydd will not provide enough jobs to compensate for any lost in the tourism sector (tourism currently provides 4 to 5 times as many jobs as the number of operational jobs that Wylfa Newydd offers). Tourism is also bringing vital economic benefits to Anglesey as the UK is preparing to leave the EU. So for these reasons it is imperative that nothing is done to threaten or damage the island's tourism sector. The local community sees little or no economic benefit coming from this proposed National Grid development, and certainly none that would come close to recompensing or mitigating the economic and environmental disbenefits that these plans for pylons would bring. The County cannot afford to withstand further economic difficulties. We expect National Grid to change its proposals so that they do not damage the County. In this matter we have the full support of the National Council of CPRW.</p> | <p>This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1)</p> |

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| Table 11: Cwm Cadnant Community Council | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| 1 | We object to National Grid's plans to erect any additional pylons or overhead cables in Anglesey's unique and beautiful landscape. | This Comment is Noted |
| 2 | We support the position adopted by all Anglesey's Town and Community Councils; by the County Council, and by all the local elected representatives including our Assembly Member and Member of Parliament, when they say with one voice that "no additional overhead electricity transmission lines and pylons should be constructed across Anglesey or the Menai Straits, due to serious concerns about the impacts which will arise from such development." | This comment is noted. |
| 3 | We do not consider that National Grid is yet in a position to proceed with plans to submit for Development Consent Order (DCO) consideration. | This comment is noted. |
| 4 | The National Grid has ignored the clear and unanimous responses of objection to its plan to erect a second new line of pylons on Anglesey. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| 5 | National Grid has manipulated the process of consultation to suit its shoddy and pre-conceived plan to erect a second line of pylons. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| 6 | In particular it has contrived to suggest that the most efficient way to transmit power from Wylfa Newydd to Deeside is by an overland route across the island of Anglesey. When clearly the shortest, most efficient and obvious route would be via sub-sea cable. An island is, after all, surrounded by sea. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| 7 | National Grid has lauded the benefits of sub-sea interconnectors when it expands its business model and profits the company, for example as part of its EU ENTSOE plans for a Europe-wide Grid. Or when it enables National Grid to expand into the energy generation sector (i.e. the UK's Capacity Market) and thereby receive millions of pounds of public subsidy for the building and operation of sub-sea transmission links to power generation plants overseas. However it is not prepared to spend some of the record-breaking profits which National Grid has made in recent years on R&D and innovative planning, so as to facilitate the least damaging transmission developments here in Wales. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| 8 | National Grid originally suggested that either a HVDC or AC sub-sea connection was possible for the transmission of power from Wylfa Newydd. However it did not thoroughly research this option, nor use the time well between 2010 and 2015, when it was known that a new power station at Wylfa would be supported by Government. As a result National Grid has cursorily dismissed this option as having "technical challenges". This is not an acceptable outcome from a company | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |

| Table 11: Cwm Cadnant Community Council | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | that has been entrusted with the most important element of national infrastructure as far as the security, economy and well-being of Wales and the UK is concerned. Furthermore National Grid has been allowed to operate this infrastructure as a monopoly business, despite the obvious potential for conflicts of interest. National Grid should have engaged with the local community, Hitachi, Natural Resources Wales and the Welsh and UK governments to highlight the technical issues which it now says prevent the most obvious and efficient transmission route, i.e. via sub-sea interconnectors. It should have planned to resolve any technical issues. | |
| 9 | It is self-evident from the documents put into the public domain, that National Grid has provided insufficient detail in its current proposed plans. The EIA is incomplete, the outline routes are too vague, and the impacts on the landscape, tourism, residential amenity, natural resources and bio-diversity features are all vaguely described. For example, the lattice pylons are described as “typically 47 metres”; the plans state “it will be necessary to remove some trees”; and “we tried to avoid encircling properties”. The ‘drive through’ 3D digital animations visualisations are nothing like the real landscape they are intended to represent. Any decent animation filmmaker could produce a much more correct and factually based representation. It is clear that these digital images have also been sanitised with certain elements removed, such as views of existing wind turbines in the north of the island and by the inclusion of an embellishment of vegetation such as the scale of hedgerows and placing trees where none exist in reality. Consequently it is very difficult to assess the impact on the totality of Anglesey’s landscape, let alone on individual localities. Because of lack of information and the kind of information provided it is not possible to judge these proposed plans accurately against the law or Welsh planning policy or guidance, except in a very general way. This is what Anglesey County Council has endeavoured to do, whilst still reserving its position without prejudice. We support the County Council in its approach and we share the County Council’s numerous valid concerns. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| 10 | We consider that the applicant (i.e. National Grid) should make funding available to the County Council and additionally to Community Councils to enable them to properly consider what is being proposed, i.e. the second largest development on Anglesey. It is a development which will have a detrimental impact on the entire County throughout the lifetime of Wylfa Newydd and clearly, in view of National Grid’s proposal to retain the existing pylons, it will impact the future economic, environmental and social well-being of Anglesey for many generations to come. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |

| Table 11: Cwm Cadnant Community Council | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| 11 | We consider that National Grid has treated the local community with contempt as it has been very selective in choosing the extent to which public responses to previous consultations have been put into the public domain. National Grid has massaged the messages and selectively quoted from responses and thus obfuscated and sanitised the true nature of the concerns. National Grid's selective quotes make it look as if the local community condone National Grid's plans for a second line of pylons, albeit wishing to see certain particular improvements. Whereas we understand that the local community is exhausted by unproductive 'tick-box' consultations and simply feel that they are powerless to influence, let alone reject the plans. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| 12 | We know how strongly our community objects to these plans. We know of no people in our community who support these plans. In fact regardless of very different strongly held opinions about other energy developments on Anglesey there is a unanimous sentiment that in no circumstances should there be further overland cables and pylons. And indeed that National Grid should come forward with plans to remove the existing pylons. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| 13 | We are finding that local support for Wylfa Newydd is being eroded by the plans being put forward by National Grid. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| 14 | National Grid has taken no account of the existing Ynys Mon Local Plan and its policies for landscape protection, especially policy 31 which is intended to protect the 'Special Landscape Area' i.e. all of Anglesey's interior countryside. This Local Plan is still the current plan and until it is replaced it will have statutory force. | The Joint Local Plan was revised in 2018, removing the all island Special Landscape Area (SLA) and focuses the SLA designation on those areas of particular importance. The assessment of effects on landscape designations are reported in Chapter 7 Landscape Assessment (Document 5.7). |
| 15 | National Grid has taken no account of the UNESCO Global Geopark landscape designation given to the whole of Anglesey in 2015. This prestigious designation is one of only 120 in the world. It is in recognition of Anglesey's unique and rich geological landscape and the natural resource that supports the local biology and eco-systems and has given rise to the environmental character and cultural heritage of Anglesey. It also confers a huge opportunity to extend the island's tourism offer. However a landscape blighted from end to end by 47 metre pylons will undercut that unique tourism offer and appeal. | <p>The Geopark designation focuses on geological heritage and the associated geo-tourism and is discussed in Chapter 11, Geology, Hydrogeology and Ground Conditions (Document 5.11) and Chapter 17, Socio-Economics and Tourism (Document 5.17).</p> <p>The assessment of visual effects is reported in Section 9 of Chapter 8, Visual Assessment (Document 5.8).</p> |
| 16 | National Grid has taken no account of Planning Policy Wales and Technical Advice Note 12. The following quoted paragraphs from TAN12 make clear why it is important so to do:- | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |

| Table 11: Cwm Cadnant Community Council | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | <p>2.1 The design of our villages, towns, cities and the urban and rural landscape is important in articulating our nation and our culture. Design is important to our quality of life, and the quality of Wales' varied landscape and townscapes – helping to sustain a positive image for Wales.</p> <p>2.4 Design is defined in PPW as:</p> <p><i>“the relationship between all elements of the natural and built environment. To create sustainable development, design must go beyond aesthetics and include the social, environmental and economic aspects of the development, including its construction, operation and management, and its relationship to its surroundings.”</i></p> <p>PPW emphasises that:</p> <p><i>“Good design is also inclusive design. The principles of inclusive design are that it places people at the heart of the design process, acknowledges diversity and difference, offers choice where a single design solution cannot accommodate all users, provides for flexibility in use, and, provides buildings and environments that are convenient and enjoyable to use for everyone.”</i></p> <p>2.5 Good design is not inevitable. It requires a collaborative, creative, inclusive, process of problem solving and innovation – embracing sustainability, architecture, place making, public realm, landscape, and infrastructure.</p> <p>2.6 Design which is inappropriate in its context, or which fails to grasp opportunities to enhance the character, quality and function of an area, should not be accepted, as these have detrimental effects on existing communities.</p> <p>3.4 Particular attention should be focused on engaging end users and stakeholders in the design process from the outset, and throughout the entire process, as a means of fostering a sense of ownership and consensus, which will be important to the long-term success of a project.</p> <p>4.1 Design is a process of analysis and synthesis: analysing, identifying and diagnosing problems and barriers, then solving them through critique, research, development and testing. Design is a creative means by which to realise innovation and add value. Design for the built environment plays a key role in economic growth and in raising the quality of the places where we live and work.</p> <p>4.3 The local context comprises the characteristics and setting of an area in which a development is located. This includes the area's natural and human</p> | |

| Table 11: Cwm Cadnant Community Council | | |
|---|---|------------------------------------|
| Consultee and Section Reference | Comment | How the comment has been addressed |
| | <p><i>history, the forms of settlements, buildings and spaces; its ecology and archaeology; its location and the routes and waterways that pass through it. Understanding the site and its immediate and wider context is the basis for a meaningful and sustainable design response, and is the responsibility of all those involved in the design process, particularly planning applicants and their agents and those formulating and implementing design policy and guidance. Further guidance on appraising context can be found in Site & Context Analysis Guide: Capturing the value of a site.</i></p> <p><i>4.5 In many cases an appraisal of the local context will highlight distinctive patterns of development or landscape where the intention will be to sustain character. Appraisal is equally important in areas where patterns of development have failed to respond to context in the past.</i></p> <p><i>In these areas appraisal should point towards solutions which reverse the trend.</i></p> <p><i>4.11 Appraisal of the landscape should focus on its quality in terms of geology and geomorphology, vegetation and habitats, visual and sensory quality and historic and cultural quality. "LANDMAP" is one method of assessment which has the potential to provide a framework and information base from which good design and management can be developed. Similar assessments are available to measure the quality of the 'seascape'. These identify what areas, characteristics and qualities are important to conserve at a time when our coastal areas face many pressures from new developments. Historic Landscape Characterisation provides a more detailed level of assessment for the historic environment, and studies have been carried out for all of the areas included in the Register of Landscapes of Historic Interest in Wales. Further detailed site appraisals may also provide information on local hydrology, microclimate, soils, plant communities and features, and all visual qualities including views and vistas.</i></p> <p><i>5.8.1 The special qualities of the rural landscape and coastline of Wales should be recognised. The qualities should be enhanced through conservation of the character of the countryside and by achieving quality in new development.</i></p> <p><i>6.17 It is a statutory requirement that certain applications for planning permission and listed building consent are accompanied by a design and access statement (DAS). Further guidance relating to the requirement for a DAS can be found in guidance produced by the Welsh Government and Design Commission for Wales.</i></p> | |

| Table 11: Cwm Cadnant Community Council | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| 17 | <p>In conclusion, we don't believe that National Grid has taken account of the early non-statutory public consultations. We are certain that National Grid's current plans will damage the local economy, which has relied on tourism in the past and which now relies on tourism more than ever.</p> <p>The local community sees no economic benefit coming from this development which will outweigh the economic and environmental disadvantages. Anglesey is not a County that can afford to withstand further economic problems. We expect National Grid to change its proposals so that they are not damaging to the County.</p> | <p>This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1)</p> |

13 Horizon Nuclear Power Services Limited

| Table 12: Horizon Nuclear Power Services Limited | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | <p>HORIZON NUCLEAR POWER LTD - CONSULTATION RESPONSE</p> <p>THE NATIONAL GRID NORTH WALES CONNECTION PROJECT - STATUTORY CONSULTATION</p> <p>UNDER SECTIONS 42 & 47 OF THE PLANNING ACT 2008</p> <p>This letter sets out Horizon Nuclear Power Ltd.'s ('Horizon') response to National Grid's {'NG'} statutory consultation (in accordance with sections 42 and 47 of The Planning Act 2008) on its North Wales Connection Project (the 'NWC Project').</p> | This comment is noted. |
| | <p>NG is proposing to build a new electricity transmission connection in Anglesey and Gwynedd to connect Horizon's proposed Wylfa Newydd nuclear power station to the National Grid. An onshore connection has been identified by NG as the preferred technology to connect the Wylfa Newydd Project comprising a route through</p> | This comment is noted. |

| Table 12: Horizon Nuclear Power Services Limited | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | Anglesey and North Gwynedd, as well as a need to strengthen the existing network in West Gwynedd. | |
| | The need for new electricity generating and transmission infrastructure is confirmed by the Overarching National Policy Statement ('NPS') for Energy ('EN-I') and the NPS for Electricity Networks Infrastructure ('EN-5'). The delivery of such infrastructure is critical to ensuring the security of UK electricity supplies going forward. | This comment is noted. |
| | Horizon therefore supports the NWC Project on the basis that there is a requirement for significant changes to the electricity transmission system in North Wales, driven by the requirement to connect and export power from a number of new generation projects, including the Wylfa Newydd Project. It is clear that in the coming years, in the absence of significant reinforcement work, there will not be sufficient capacity available on the existing transmission network to meet such requirements. | This comment is noted. |

| Table 12: Horizon Nuclear Power Services Limited | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | Reinforcement of the grid is essential if Wylfa Newydd is to be built and deliver significant jobs and investment to Anglesey and the wider north Wales region. We want to see a workable, affordable and reliable connection, delivered on time, which takes account of local engagement and consultation. | This comment is noted. |
| | Notwithstanding the above, in reviewing the consultation material, notably the draft land and works plans, Horizon has identified some areas of concern with regard to the NWC Project in terms of land take and the impact of this upon the Wylfa Newydd Project and its associated development sites. In particular, these relate to the layout of the proposed Wylfa substation and certain aspects of the overhead line route on Anglesey that conflict with our proposals for the surrounding area, including delivery of mitigation solutions, and may require amendments to the land and works plans. We are also keen to ensure maximum | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |

| Table 12: Horizon Nuclear Power Services Limited | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | consideration is given to optimise safety, operational resilience and schedule. | |
| | We would welcome the opportunity to engage further with NG in the near future in order to discuss the details of its proposals within the vicinity of the Wylfa Newydd Project and its associated development sites so as to ensure our concerns are addressed (if necessary through the agreement of appropriate protective provisions) and that there is consistency between the respective projects. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |

14 Llanbadrig Community Council

| Table 13: Llanbadrig Community Council | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | On behalf of Llanbadrig Community Council and the community they represent, I am responding to your current consultation documents, noting the strong opposition for pylons and overhead cabling across Anglesey | This comment is noted. |
| | <p>The Community Council strongly objects to your proposals for overhead cables for a number of reasons and ask that you consider installing the cables underground. Some of the reasons are as follows:</p> <ul style="list-style-type: none"> - health concerns regarding the safety of the equipment and the EMF surrounding it. - the negative impact on tourism for which the community is so heavily reliant - the negative impact on the landscape and views - Anglesey is a rural area with many areas designated AONB. The views are second to none and are an important factor to the island's economy - long and short term environmental impacts with regard to installation and maintenance | <p>Matters relating to EMF are discussed in the EMF Report (Document 5.25)</p> <p>The landscape assessment has considered the effects on Anglesey AONB and its setting. The assessment of effects on landscape designations are reported in Chapter 7, Landscape Assessment (Document 5.7). This assessment makes reference to Appendix 8.2, Viewpoint Assessment (Document 5.8.2.2).</p> <p>The assessment of visual effects is reported in Section 9 of Chapter 8, Visual Assessment (Document 5.8). Information from this assessment has informed Chapter 17, Socio-Economics and Tourism (Document 5.17).</p> <p>Chapter 17 (Document 5.17) assesses potential socio-economic effects of the Proposed Development on tourism and includes consideration of individual receptors, such as tourism businesses, assessing the potential effects on them arising from visual, noise, air quality or traffic and transport impacts, in isolation or in combination. The assessment also considers potential effects on the wider tourism sector that could result from changes in visitors' behaviours or perceptions of the area. This has informed by the outputs of a bespoke Visitor Behaviour Survey.</p> |
| | Cemaes and Llanbadrig in particular are facing vast development in the very near future - Wylfa Newydd, redevelopment of Rhyd y Groes Wind Farm, possible solar farm, possible tidal energy projects. The cumulative effect of these projects surely must be considered before further installations in the immediate area. It has been proposed that should the National Grid be unable to underground the entire length of cable across Anglesey (the preferred option at relatively little additional cost in the grand scheme of the matter), then the length of cable equivalent to the first 20 pylons be installed underground to soften the blow to the Llanbadrig area. | Cumulative effects with other developments are considered in Chapter 20 Inter-Project Cumulative Effects (Document 5.20) |
| | I look forward to the next stage of your proposals and hope to see that you have taken into account and listened to the communities that are to be most affected by your project. | This comment is noted. |

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15 Llanfairpwll, Llanfair Yn Neubwll, Penmynydd, Pentraeth, Trearddur,

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| Table 14: Llanfairpwll, Llanfair Yn Neubwll, Penmynydd, Pentraeth, Trearddur, Trewalchmai and Llanfihangellesceifiog Community Council | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| Section: Q1. Wylfa substation and the overhead line on Anglesey | <p>We submit this Council's latest response to the Statutory Consultation on the National Grid's proposal to erect another row of pylons for the transmission of electricity across Ynys Mon, and our submissions are as follows;</p> <p>Since its commencement in 2012 it has been pointed out to you on many occasions that there are serious flaws since, although you persist in mentioning "options", there are in fact none offered. All that was ever on offer was an alongside the existing pylons' route, with the only so-called (by you) "options" being small colour-coded diversions and changes in direction to accommodate local opinions expressed and changes in ground conditions around amenities developed over the years since the erection of the existing line of pylons. You are at odds with your own Grid's Guidelines of; "Consulting widely, effectively and at the formative stage of our project proposals".</p> <p>As a result your Consultation is flawed.</p> | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | <p>Since 2012, at every stage of the various consultations you have persisted with your choice of pylons and just say that you have done some "feasibility studies" (not disclosed) into other options but that the sole reason for your insistence on pylons is that the only method in which the job can be done cheaply is with overhead lines on an additional row of pylons. You have acknowledged the need to "mend your ways" to accommodate the local objections displayed around the area of the "Menai Crossing", but there is strong suspicion that you always had this sweetener "up your sleeves" from the very start. Your approach contravenes the Grid's guidelines, "We have no inherent preference for either overhead or underground approaches and we will always seek to deliver the best balance."</p> <p>As a result your Consultation is flawed.</p> | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | <p>You have your own guidelines on transparency which you have made no attempt to adhere to, "Being open with information and transparent about the judgements we make." Since 2012, whilst promoting its proposal locally, the Grid claims that pylons are "much cheaper" than other possible options without providing full data such as:</p> <p>Cost of the Menai crossing "reconsideration".</p> <p>Compensation for affected landowners, or property values etc.</p> | <p>This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) The landscape assessment has considered the effects on Anglesey AONB and its setting. The assessment of effects on landscape designations are reported in Chapter 7, Landscape Assessment (Document 5.7). This assessment makes reference to Appendix 8.2, Viewpoint Assessment (Document 5.8.2.2).</p> <p>The Geopark designation focuses on geological heritage and the associated geo-tourism and is discussed in Chapter 11, Geology, Hydrogeology and</p> |

| Table 14: Llanfairpwll, Llanfair Yn Neubwll, Penmynydd, Pentraeth, Trearddur, Trewalchmai and Llanfihangellesceifiog Community Council | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | <p>In comparison, the Grid is dealing unfairly with Ynys Mon, ignoring our AONB status in 2012 and now the Internationally important LTMESCO Geopark designation for the whole of the island. This in direct contrast to the Grid's approach to other protected areas of the UK viz. ,</p> <p><i>"In what circumstances will National Grid now underground new electricity lines? The presence of highly valued landscapes such as National Parks, Areas of Outstanding Natural Beauty and other nationally important areas".</i></p> <p>The evidence indicates that the Grid has dealt unfairly with Anglesey, ignoring our AONB designation in 2012 and now ignoring the nationally important UNESCO Global Geopark designation for the whole of Anglesey. This is in direct contrast to the Grid's approach to other protected landscapes in Britain. "In what circumstances will National Grid now underground new electricity lines? The presence of highly valued landscapes such as National Parks, Areas of Outstanding Natural Beauty and other nationally important areas."</p> <p>As a result your Consultation is flawed.</p> | Ground Conditions (Document 5.11) and Chapter 17, Socio-Economics and Tourism (Document 5.17). |
| | <p>The Grid claims to; "Consider environmental, socioeconomic and technical issues alongside a capital and lifetime cost for each strategic option". The Consultation process does not allow us to discuss the socioeconomic injustice of this attempt to push through the Grid's blinkered one and only preferred method of transmission of power, in:</p> <p>Dismissing the democratic voices representing the people of Ynys Mon such as the MP, AM, the Count Council and last but by no means least, ourselves, the Community Councils.</p> <p>Ignoring 92% of the respondents who clearly stated that they are against any more pylons being erected and ruining our cherished and world renowned vistas and attractions.</p> <p>Ignoring the unanimous opposition to pylons as expressed in the local and national press. Anglesey is an economically disadvantaged area more dependent on Tourism and Agriculture than any other area of the UK (ONS) yet, despite promises, the Grid refuses to undertake an Ynys Mon specific impact assessment. Both the short and long term impact on these sectors including the</p> | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |

| Table 14: Llanfairpwll, Llanfair Yn Neubwll, Penmynydd, Pentraeth, Trearddur, Trewalchmai and Llanfihangellesceifiog Community Council | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | <p>land restrictions that will be in place for at least another 50 yrs. are also of great concern.</p> <p>Since the Grid's rationale for pylons is the costs to the UK, it is unacceptable that no data is provided for e.g. cost to land and property owners affected by the pylons and overhead lines over what will be a greatly increased and massive swathe of pylons and cables on an industrial scale across the Island. Since it is not addressed it appears that the Grid, despite this being a disadvantaged area, have decided that losses, which could be at least 30% of property values, be ignored in order to subsidise savings in areas of perceived greater importance elsewhere in the UK.</p> | |
| | <p>Why don't the Grid's transmission plans refer to The Well-being of Future Generations Act (Wales)? , public evidence shows that the Senior Project Manager was unaware of this Act and its requirements until 26/10/16. We are told that, apart from one long term post (job), the pylons' choice compared with other tried and tested options not considered, offer no advantage to future generations and indeed significant negative benefit when weighed against the impacts on the environment, heritage, leisure amenities, health, property value, and the sustainability of the tourism and agricultural businesses are taken into account. The impact of so many pylons in total as proposed contravenes the Grid's own identified duties; "We also have a duty to 'consider the desirability of preserving amenity' when undertaking projects which includes impacts on communities, landscape and visual amenity, cultural heritage and ecological resources".</p> | <p>Matters relating to well-being are presented in the WBR (Document 5.27). Impacts on Amenity are addressed in Chapter 17 Socio Economics (Document 5.17) and also in the appended Amenity Assessment (5.17.2.1)</p> <p>An Amenity Assessment has been undertaken which considers all communities within the Study Area. No significant effects have been identified. Details are provided in Appendix 17.1 (Document 5.17.2.1).</p> <p>A WBR (Document 5.27) has been prepared in conjunction with IACC. This describes the potential effects of the Proposed Development in relation to the goals for well-being as set out in the Well-being Act.</p> |
| | <p>We are not provided with a safety case for transmission from a nuclear power station using two roughly parallel pylon lines which are vulnerable (they can be brought down by adverse weather conditions, by accident or by an act of terrorism). In these times, one or all those events seem to be greater risks than ever before. Certainly there are feasible and proven options; in this case the whole route undergrounding or undersea, that would provide diversity of transmission and hence greater safety. The onus should be on the proposer to communicate and submit the safety case of this greater risk pylon choice of pylons. Therefore, the Senior Project Manager's response to this is unacceptable in saying that this is a problem for the developer and has nothing to do with the Grid's pylons" proposal. Although promising locally that it would be done, it has since been side-stepped by the Grid and similarly the provision of a local health impact study which was requested given the high levels of illnesses such as</p> | <p>This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1)</p> |

| Table 14: Llanfairpwll, Llanfair Yn Neubwll, Penmynydd, Pentraeth, Trearddur, Trewalchmai and Llanfihangellesceifiog Community Council | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | leukaemia and cancer which are associated with the present overhead lines, many of which are 60m or less distance from homes and workplaces. Thus reneging on the promise to provide of a health impact report is not reassuring to the island's population, rather causing even more concern about the EMFs when combined with the known factor of high radium levels in certain areas, and certainly the unknown factors of the increased risks due exposure from two parallel lines of multi overhead cables, giving rise to our opinion that a precautionary approach should be applied in order to avoid unacceptable risks. | |
| | Despite confirming locally that this would be done, the Grid has since side-stepped the commitment to provide a local health impact study which was requested given the high levels of illness such as leukemia and cancer which are associated with the present overhead lines, often less than 60m away from homes. This U-turn on the promise of a local health impact report, far from reassuring the public, causes much more concern locally about the EMFs impacts especially unknown factors such as the increased risks due to exposure from two parallel lines, and the impacts of EMFs combined with the high levels of radon on the island. It is our opinion that the 'precautionary' approach should be applied to avoid unacceptable risks, given the absence of data to prove that EMFs are safe on Anglesey, and plenty of circumstantial evidence to indicate the EMFs have already had significant health impacts on Anglesey. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | There is no date provided in support of any assumption or proof that EMFs are safe over Anglesey but ample circumstantial evidence indicating that EMFs have already had significant health impacts on the population. | Matters relating to electric and magnetic fields are set out in the EMF (Document 5.25). |
| | The proposed plans, that face so much opposition locally, should not be 'rubber stamped by Government in Westminster with frustration arising from the National Grid's intransigent and indeed arrogantly flawed consultation could lead law-abiding citizens into conflict. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | To conclude, in essence the Grid's proposal is at odds with natural justice, Anglesey's population have long tolerated the impacts of the existing electricity supply structure including the controversial Wylfa nuclear power producing facility, for two/three generations, and now face another massive phase of development with the next nuclear station Wyifa Newydd which, however it is viewed by many is, not the subject of this particular so –called consultation by the Grid, and there is some reassurance felt that since the technological advancement in that method of generation, together with the lessons learned in | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |

| Table 14: Llanfairpwll, Llanfair Yn Neubwll, Penmynydd, Pentraeth, Trearddur, Trewalchmai and Llanfihangellesceifiog Community Council | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | the intervening decades, the safety aspect is greatly improved, therefore that subject, as an issue is no part of this response to your (only pylons, but slightly 'tweaked' plans) proposal although it may be of concern to many. | |
| | Together the impacts of the existing electricity infrastructure plus this greatly increased transmission capacity as proposed will be of benefit to electricity consumers all over the UK, therefore it is only fair and proper to expect commensurate investment in the Transmission infrastructure from beneficiaries across the entire UK. In short, if all the differences are about money, which the Grid have now publically admitted, at least the cost of proven technology alternatives should be calculated and presented for discussion, around the cost to our small but precious heritage which to us which is immeasurable and priceless. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | In short The National Grid's proposal, denigrates the world renowned landscape of Anglesey and Arfon, from Wylfa Newydd to Pentir except for the paltry concession of underground/undersea cabling in the area of the Menai Strait and is offensive to all the islanders and others who, through their electricity bills are already subsidising alternatives, such as subsea and undergrounding, elsewhere in Britain. We cannot accept such a brazen attempt to impose further inequality and disadvantage on the Anglesey electorate and the future generations | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| Section: Q6. Do you have any comments on the consultation process? | Question: Has the information presented been useful in helping you respond to this consultation? Yes | This comment is noted. |
| | Question: Do you have any comments on the consultation process? No comment was made | This comment is noted. |

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16 Mechell Community Council

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| Table 15: Mechell Community Council | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | Please find attached the response of Cyngor Cymuned Mechell to the North Wales Connection Project consultation ending 16th December 2016. | This comment is noted. |
| Response of Cyngor Cymuned Mechell to the North Wales Connection Project consultation ending 16th December 2016 | Cyngor Cymuned Mechell (CCM) represent and voice the opinions of 947 of people within their ward. There are seven well-being goals in the Well Being of Future Generations (Wales) Act 2015, one of them "a more equal Wales". As we represent the Mechell residents, we demand that National Grid treat our people in the same manner as the people of the Lake District. | Issues relating to well-being are considered in the WBR (Document 5.27). |
| | CCM has considered the latest proposals and object to them in the strongest possible terms as given below. CCM has canvassed opinion in the area, and has determined that there is opposition to the proposals throughout the community and they have caused great distress to some residents. | This comment is noted. |
| | <ul style="list-style-type: none"> CCM is hosting the Wylfa Newydd installation as well as the existing facility and the existing 400kV line. The cumulative effect of the additional line would turn the area into an industrial landscape. The lines will be visible from virtually every vantage point in the area, and will drastically affect the visual environment. | <p>The Preferred Route Option Selection Report (Document 9.5) sets out a more detailed account of the rationale behind routeing.</p> <p>The Design Report (Document 7.17) describes the evolution of the Proposed Development and demonstrates that minimising harm to the landscape through sensitive routeing and design was a major consideration during its development.</p> <p>The assessment of visual effects is reported in Section 9 of Chapter 8, Visual Assessment (Document 5.8).</p> |
| | <ul style="list-style-type: none"> National Grid have failed to respond to counter proposals that the lines should be placed underground in sensitive areas despite the fact that it is a standard technology (16% of grid cabling is underground according to National Grid's own website). Also, there is already underground cabling in the CCM area from the existing Wylfa power station so it is irrefutable that it is a viable and frequently deployed technology. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | <ul style="list-style-type: none"> National Grid frequently asserts that they are required to install infrastructure which is 'cost effective to build and operate'. The final determination of the new connection details will take account of cost | This comment is noted. |

| Table 15: Mechell Community Council | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | to the taxpayer and the dividends of NG shareholders. The costs to the residents of this community do not appear to be a factor worthy of consideration. | |
| | <ul style="list-style-type: none"> If the present plans are accepted, the changes to the visual environment, safety fears of EMFs will lead to a reduction in property values as well as deterioration in the quality of life of residents of our community. | <p>A residential visual amenity assessment has been undertaken for all properties that fall within 500 m of LOD/maximum parameters of the Proposed Development, the results of this assessment are found in Appendix 8.3, Residential Visual Amenity Assessment (Document 5.8.2.3). Planting would be offered to residential receptors in the form of a Voluntary Residential Planting Scheme (VRPS). This would include the offer of planting to reduce/ minimise visual effects for eligible properties identified during the assessment.</p> <p>Enhancement measures along with the VRPS are presented in the Enhancement Strategy (Document 7.13).</p> <p>Matters relating to electric and magnetic fields are set out in the EMF Report (Document 5.25).</p> |
| | <ul style="list-style-type: none"> CCM is of the view that the new connection lines should be placed underground all the way to Penttir. | This comment is noted. |
| | <ul style="list-style-type: none"> CCM appreciate that there is an additional cost to underground all pylons, but with an operating profit of £4.1bn (up by 6%) and earnings per share of 63.5p (up by 10%) in 2015/16, this additional cost should be subsidised by shareholders NOT the population of Anglesey. | This comment is noted. |

17 Menai Science Park

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| Table 16: Menai Science Park | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| Q1. WYLFA SUBSTATION AND THE OVERHEAD LINE ON ANGLESEY | <p>RESPONSE BY M-SPARC TO NATIONAL GRID'S CONSULATION ON A NEW CONNECTION ACROSS ANGLESEY</p> <p>Menai Science Park (trading as M-SParc) is in course of development as the first dedicated Science Park in Wales. It has secured £21 m in funding from the Welsh Government and European Regional Development Funds to develop the first phase of the project on a site known as Cefn Du in Gaerwen. A location plan showing the site is attached to this submission.</p> | This comment is noted. |
| | <p>M-SParc which expects to open its first state of the art building in 2017-18 aims to bring innovative research projects and science based inward investors in the low carbon energy, environment and ICT sectors to the park and exploit knowledge exchange into successful businesses. To date, strong interest has been shown by prospective tenants which are start-ups, accelerators, grow on companies and anchor tenants from across the globe.</p> | This comment is noted. |
| | <p>The site at Gaerwen was chosen following an extensive long listing and short listing process. We looked at sites both on Anglesey and on mainland Gwynedd. Gaerwen was chosen for a range of reasons, not least of which is its superb access to the A55 (just off junction 7), its relative proximity to Bangor University and the ability to develop a site within a 'parkland' type setting. All this will enable us to develop a science park ethos, which is conducive to attracting high level research projects. The site and first building commands superb views of Snowdonia. Early prospective tenants who have visited us are inevitably drawn to the site due to its location and the wonderful views afforded. A video flyover of the site can be found online at https://www.youtube.com/watch?v=xOoJelJ6zxE, the video shows the location and views to best effect.</p> | This comment is noted. |
| | <p>We have examined National Grid's latest proposals for a line of pylons, particularly the section between Ceint and Afan Brain! (Section E). We note that the line of the pylons come within 500m of our site and will have a significant and adverse impact on the view tenants and occupiers will have of the Snowdonia mountain range.</p> | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |

| Table 16: Menai Science Park | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | Many of the occupiers will chose this particular location because of the magnificent setting of the park, its parkland feel and being in the heart of some of the most spectacular scenery in Wates. A line of pylons coming so close to our site will clearly detract from its appeal. | |
| | Given the significant public sector investment in the site, and the need to improve the economy in North West Wales, anything which detracts from the attractiveness and appeal of the site will be a massive concern to us and those who are investing in the project. | This comment is noted. |
| | We note that you have already taken note of the impact of the previous proposed route on tourism and tourism traffic. We can make an equally strong case for the economic impact on the science park. Currently the investment in M-SParc is the biggest on the island, and the project is recognised by the Welsh Government, the three local authorities in North West Wales and the North Wales Economic Ambition Board as a key driver for economic improvement in the region. | This comment is noted. |
| | We also note the plans to underground the connection across the Menai Straits in view of the sensitive nature of the area. We believe that an equally strong case can be made for section E as a whole whereby the best solution would be to take the connection through an underground route. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | It should also be noted that M-Sparc did respond to your earlier consultation online in December 2015 and we were disappointed not have received a response to the points we made on that occasion. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| Q6. Do you have any comments on the consultation process? | We have stated in our current response that we were disappointed not to have received feedback on our response to an earlier consultation. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |

18 National Farmers' Union (Nfu) Cymru

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| Table 17: National Farmers' Union (NFU) Cymru Table 28: | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | <p>I write to offer the views of NFU Cymru in respect to National Grid's proposed work to connect Wylfa to Pentir.</p> <p>NFU Cymru represents the interests of farmers, managers and partners in agricultural business including people who have an interest in farming and the countryside.</p> <p>We have consulted widely with members on Anglesey and North Gwynedd in formulating this response and also encouraged them to attend your open sessions on the project.</p> | This comment is noted. |
| General Comment | NFU Cymru's priority is to ensure that major infrastructure projects do not damage agricultural land or negatively affect farming businesses. There should not be an automatic presumption that agricultural land can be sacrificed for infrastructure projects of this type. | This comment is noted. |
| | We are concerned that the National Grid consultation has effectively ignored previous submissions made by only stating their preferred over ground option with only very limited undergrounding in the Menai Strait Area. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | Farming under overhead transmission lines and around pylons poses considerable operational difficulties and additional costs for farmers. Worryingly it seems to us that this has been totally ignored in this route yet you have chosen to avoid areas of land with low agricultural value. | <p>For overhead lines a statutory minimum safety clearance must be maintained between conductors and the ground: the higher the voltage of the line, the greater the clearance which is required. For new 400 kV overhead lines the minimum ground clearance is 8.1m, allowing farm machinery to pass underneath. Therefore, this aspect is not considered within the ES.</p> <p>Through the iterative design process, which also included a review of consultation responses and taking into account engineering and other environmental considerations, where practicable, pylons and other infrastructure have been micro-sited (re-positioned) to avoid or minimise impacts to agricultural activities.</p> <p>Areas of high quality land (Grades 1 and 2) were avoided at an early stage of the design and route selection process (mitigation by design).</p> |
| | Technological advances in electricity transmission must be developed, embraced and implemented without delay. This would include advances in high voltage underground and undersea cabling. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |

| Table 17: National Farmers' Union (NFU) Cymru Table 28: | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| Agriculture | A sustainable productive agricultural industry is critical but massively undervalued asset for the UK. As the population increases and diets evolve coupled with changes in the climate, the UK will become increasingly dependent on our own agricultural land for food production. Anglesey often referred to as the granary of Wales is well placed to meet this objective. | This comment is noted. |
| | <p>The area concerned is deeply rural and predominantly agricultural. A range of enterprises are located in the proposed route corridors and they include livestock and dairy but also arable, free range egg units and broiler units. The land is a mix of permanent pasture, forage and arable crops. Agriculture is hugely important to the economy of the area with many residents deriving their main income from agricultural enterprises.</p> <p>Clearly, an overhead transmission line can cause practical difficulties for farmers and in our opinion should be avoided wherever possible. Furthermore in this case there are two real alternatives.</p> | <p>The ES Chapter 18 Agriculture (Document 5.18) presents an assessment of potential impacts of the Proposed Development on the following factors: Loss of agricultural land; Environmental disruption to agricultural landholdings; Damage or disturbance to soil resources; Loss of soil resources; Loss of eligibility for AES; and Disturbance to agricultural land drainage. The CEMP (Document 7.4) and the OSMP (Document 7.10) sets out the mitigation measures necessary to reduce adverse impact on agriculture and soils.</p> <p>Throughout the Project, the National Grid Lands Team have been in consultation with the Land Owners to identify any areas of increased sensitivity which may be affected by the development, to allow appropriate mitigation measures put in place so to manage the impact.</p> <p>For overhead lines a statutory minimum safety clearance must be maintained between conductors and the ground: the higher the voltage of the line, the greater the clearance which is required. For new 400 kV overhead lines the minimum ground clearance is 8.1m, allowing farm machinery to pass underneath.</p> <p>Through the iterative design process, which also included a review of consultation responses and taking into account engineering and other environmental considerations, where practicable, pylons and other infrastructure have been micro-sited (re-positioned) to avoid or minimise impacts to agricultural activities.</p> |
| Substation Siting Areas & Route Corridor Options | In respect to the potential locations for the proposed substations and the various corridor options for the transmission route then we are unable to offer any preference but do wish to concentrate our submission on some of the very important criteria that would impact on all these areas and route corridors. | This comment is noted. |
| Specific Issues | There are a number of issues that need to be considered in respect to the siting of the proposed substation and the route corridors together with other related potential issues for farmers and landowners. | This comment is noted. |

| Table 17: National Farmers' Union (NFU) Cymru Table 28: | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | These would include: | |
| Subsurface Cables | As we have already indicated we have now reached the conclusion that if such projects as this are to proceed, then they should do so on the basis of placing cables underground and or undersea wherever technically feasible. It is our view that this would minimise the landscape, amenity and economic impacts of the connection project. There is a subsea opportunity and would be our preferred option. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | By stating your preferred option of using over ground cables you have immediately portrayed an impression that you are not doing consultation from a 'neutral' point of view in respect to underground versus overhead lines. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | We cannot accept that it is too expensive to consider that the whole route should or could be undersea or underground at the start of this process. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | In considering all aspects associated with such projects we are drawn to a firm conclusion that they should adopt a guiding principle that the cabling is undersea. Technological advances in electricity transmission must be developed, embraced and implemented without delay and this would include advances in high voltage underground cabling. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | Any additional cost associated with this approach we would suggest is affordable to your company and it is justified by the importance of maintaining visual amenity, minimising any health risks and limiting the long-term interference to farming operations and the importance of tourism to the island's economy One option would be an undersea link from Wylfa to Deeside. This would have the added advantage of transmitting heavy electricity loads directly to where it is needed in the heavily populated areas and industrial areas in the UK and avoiding further pressure on the North Wales loop. We realise that this for operational reasons may require conversion stations from AC to DC. If the building of such large structures is not permitted in the planning process or suitable sites are not available then the undergrounding option all the way should be considered. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| People & Communities | We are aware of concerns that electric and magnetic fields (EMFs) can be generated from a wide variety of sources, including the distribution and transmission power lines and seek assurances that people living and working near transmission lines will not experience adverse health impacts. This is | Matters relating to electric and magnetic fields are set out in the EMF Report (Document 5.25). |

| Table 17: National Farmers' Union (NFU) Cymru Table 28: | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | particularly a concern for families with young children and is an issue that can cause considerable anxiety. The public perception that it is unhealthy to live close to a high voltage line also contributes to property undesirability and devaluation. Furthermore the parallel high voltage lines will have some properties in between them adding misery to the quality of lives of the owners and occupiers not to mention the drop in value of the properties. | |
| Tourism & Diversified Businesses | Many of our members have sought alternative sources of income by diversifying into providing a 'service' for tourists whether it is B&B; or more substantial investment in the form of camping & caravan parks; self-catering accommodation and holiday parks. | This comment is noted. |
| | It is clear that pylons and overhead power lines will inevitably impact upon some of these businesses, some more than others. Those affected directly will inevitably be those over which the lines will run or those from which pylons and lines can be directly viewed. | A residential visual amenity assessment has been undertaken for all properties that fall within 500 m of LOD/maximum parameters of the Proposed Development, the results of this assessment are found in Appendix 8.3, Residential Visual Amenity Assessment (Document 5.8.2.3). Information from this assessment has informed Chapter 17, Socio-Economics (Document 5.17). |
| | As the local landscape would be negatively affected by transmission lines and pylons, there would be a permanent negative effect on tourism and those businesses relying on it and this would have a significant detrimental impact upon the rural economy. Furthermore some of the area to be crossed is within or very near the Anglesey area of outstanding natural beauty and these areas would be permanently scarred. The visual effect is compounded due to the flat nature of the island which will be compounded even more with a parallel set of cables and pylons. | Chapter 17 Socio Economics (Document 5.17) assesses potential socio-economic effects of the Proposed Development on tourism and includes consideration of individual receptors, such as tourism businesses, assessing the potential effects on them arising from visual, noise, air quality or traffic and transport impacts, in isolation or in combination. The assessment also considers potential effects on the wider tourism sector that could result from changes in visitors' behaviours or perceptions of the area. This has informed by the outputs of a bespoke Visitor Behaviour Survey. |
| Transport Infrastructure | There is some concern that some roads and villages in the identified route corridors are incapable of carrying the amount of traffic and the size of loads required for the construction of a substation and connection line. Many of the areas in the route corridors are served by minor roads, mainly single track and some with wet sections. | An OCTMP (Document 7.5) has been developed in consultation with the relevant local highway authorities and has evolved during the preparation for the Proposed Development. Potential effects on local road are assessed in the ES (Document 5.13) and the TA (Document 5.13.2.1) |
| Habitats & Wildlife | Many farms within potential route corridors participate in agri-environment schemes. There will be potential disruption to these schemes which are partly landscape protection schemes. | The Agriculture EIA considers both temporary and permanent changes in AES eligibility along the route. Mitigation measures, as listed in the CEMP, would ensure that soil resources retain their properties, function and structure upon |

| Table 17: National Farmers' Union (NFU) Cymru Table 28: | | |
|---|---|---|
| Consultee and Section Reference | Comment | How the comment has been addressed |
| | | <p>restoration; allowing the land to be returned to the same quality and condition as prior to construction; and thereby AES eligibility to be reinstated.</p> <p>The AES considered in ES Chapter 18 Agriculture (Document 5.18) may also contain features which are considered to be ecological or landscape constraints, for example species diverse hedgerows, and are considered in Chapter 9 Ecology and Nature Conservation (Document 5.9) or Chapter 7 Landscape (Document 5.7) where appropriate.</p> |
| Operational Issues | We are very conscious of the potential health & safety threats posed by farming the land beneath overhead power lines. Pylons can potentially cause an obstruction for larger machinery and the cables could pose a health and safety risk. | For overhead lines a statutory minimum safety clearance must be maintained between conductors and the ground: the higher the voltage of the line, the greater the clearance which is required. For new 400 kV overhead lines the minimum ground clearance is 8.1m, allowing farm machinery to pass underneath. Operating tall equipment or lifting gear beneath an overhead electricity line should be avoided. |
| Management of Pylon Bases | Following consultation with farmers in other areas who already have pylons on their land we would wish to highlight the potential for weed burdens to build quite considerably under pylon bases. These areas are not accessible to efficient means of weed control and will potentially lead to more labour intensive methods, increased management costs and other problems associated with weed control. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| Noise | We are aware that pylons do generate a degree of noise particularly during damp weather and this could be to an unacceptable high level. We would also wish to highlight the potential for the level of noise to impact on property and livestock, particularly milk production. | Current research does not suggest that a high voltage connection has an effect on milk production or on the health/reproductive capacity of cattle. When it comes to noise, overhead transmission lines are designed to minimise noise although under certain conditions, for example during rain or fog, a 'crackle' or a 'hum' may be audible from some types of overhead line. National Grid is not aware of any instances where noise from overhead lines has adversely affected livestock in reducing milk yields. Information about operation noise related to the Proposed Development is presented in ES Chapter 16 Operational Noise (Document 5.16). |
| Visual and Landscape Impacts | We cannot overstate the visual impact that overhead power lines have on the landscape of such areas. We would ask if there have been any computerised images produced of the likely visual impact of the transmission line as it could be envisaged throughout various locations of each route corridor. No detailed | A digital model was prepared for consultation and was presented as a series of videos at public consultation events and on the project website in addition to a number of photomontages at locations along the length of the Proposed Development. |

| Table 17: National Farmers' Union (NFU) Cymru Table 28: | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | images of the whole of the route have been prepared for the consultation process and an important part of the public information has not been forthcoming | A number of viewpoints have been chosen as part of the visual assessment in order to assess the effects of the Proposed Development. A selection of these viewpoints have been chosen to illustrate the Proposed Development as photomontages. The Viewpoint Assessment is presented in Appendix 8.2 (Document 5.8.2.2) and photomontages in Photomontages (Document 5.29). |
| Compensation | Compensation packages must be an integral part of the equation and reflect the inconvenience and effect of electricity transmission from such large energy projects. Such compensation mechanisms it seems have not been factored in, in the cost comparisons you have made between various options, including the permanent disruption and effect that would be caused by the above ground grid connection project. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| Conclusion | I hope that you find our contribution prepared on behalf of Anglesey NFU Cymru useful and you are prepared this time to take our comments into account. | This comment is noted. |
| | At times like these one turns to look what has happened in other parts of the UK. In the Lake District for example National Grid has committed to bury electricity transmission line to connect the forthcoming Nuclear Power Station in Cumbria. National Grid had initially said as they have on Anglesey said that cabling underground along the entire route through the Park would be very unlikely. However they soon said after the expense of the extra cost would help reduce the projects potential effect on people places and the environment. Do not the people places and environment of Anglesey, with its AONB and GeoPark status count then? This can only be described as discriminatory behaviour by National Grid bearing in mind the total opposition to a series of 160ft pylons and cables by Anglesey residents, farming community, the Member of Parliament, the Assembly Member and all the county councillors on the island. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | Currently nearing completion is an undersea 385 Km transmission line connecting Hunters ton on the West Coast of Scotland to Connah's Quay in North Wales across the Irish Sea. Surely a much shorter and easier undersea route from Wylfa to Connah's Quay is similarly possible? There are numerous examples of other undersea electricity cables working without problems throughout the World including connections to the Isle of Man and Ireland. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |

19 Network Rail Infrastructure Ltd

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| Table 18: Network Rail Infrastructure Ltd | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | Network Rail has been reviewing the information to date and at this stage it is not sufficiently detailed to fully assess potential impacts of the scheme on the railway and further information will be required to properly respond on the likely impacts of the proposed scheme. | This comment is noted. |
| | It is likely however that the proposal will impact on railway infrastructure, for example it looks as though the proposed route of the overhead power lines will cross two sections of the railway in Anglesey (west of Llanfairpwll and between Rhos-goch and Rhos-y-bol). | This comment is noted. |
| | Network Rail will be seeking protection from the exercise of compulsory purchase powers over operational land either for permanent or temporary purposes. In addition, Network Rail will wish to agree protection for the railway during the course of the construction works and otherwise to protect our undertaking and land interests. Network Rail reserve the right to produce additional and further grounds of concern when further details of the application and its effect on Network Rail's land are available. In addition, any rights for power or other lines under, over or alongside the railway line will require appropriate asset protection measures deemed necessary by Network Rail to protect the operational railway and stations. We have standard protective provisions which will need to be included in the DCO as a minimum and in addition, other agreements may need to be entered into with Network Rail. A number of legal and commercial agreements may need to be entered into. This will be reviewed once more details of the scheme are discussed between the parties. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | Consideration should be given to ensure that the construction and subsequent maintenance can be carried out to any proposed buildings or structures without adversely affecting the safety of, or encroaching upon Network Rail's adjacent land. In addition security of the railway boundary will require to be maintained at all times. In any event you must contact Network Rail's Asset Protection Engineers as soon as possible in relation to this scheme on the following e-mail address AssetProtectionWales@networkrail.co.uk Network Rail is prepared to discuss the inclusion of Network Rail land or rights over land subject to there being no impact on the operational railway, all regulatory and other required consents being in place and appropriate commercial and other terms having been agreed between the parties and approved by Network Rail's board. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |

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20 North Anglesey Council's Partnership

| Table 19: North Anglesey Council's Partnership | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | Having discussed the North Wales Connection Proposals on a number of occasions, the North Anglesey Councils Partnership (an organisation representing six town and community councils in North Anglesey) strongly oppose erecting a second row of pylons across the island and ask that the National Grid look to identify other means of transmission. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | There are grave concerns regarding the negative visual impact on the economy of an area so dependent on tourism. There are also concerns regarding environmental impacts, both short and long term. Not only that, it is felt that a second row of pylons will have a serious effect on the price of property and land across the island. | <p>The assessment of effects on general public visual amenity, from publically accessible places are described in Chapter 8, Visual Assessment (Document 5.8).</p> <p>A residential visual amenity assessment has been undertaken for all properties that fall within 500 m of LOD/maximum parameters of the Proposed Development, the results of this assessment are found in Appendix 8.3, Residential Visual Amenity Assessment (Document 5.8.2.3).</p> |

| Table 19: North Anglesey Council's Partnership | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | | <p>Information from these assessments has informed Chapter 17, Socio-Economics (Document 5.17).</p> <p>Chapter 17 (Document 5.17) assesses potential socio-economic effects of the Proposed Development on tourism and includes consideration of individual receptors, such as tourism businesses, assessing the potential effects on them arising from visual, noise, air quality or traffic and transport impacts, in isolation or in combination. The assessment also considers potential effects on the wider tourism sector that could result from changes in visitors' behaviours or perceptions of the area. This has informed by the outputs of a bespoke Visitor Behaviour Survey.</p> |
| | As a Partnership we look forward to hearing from you in due course, and hope you will take into account the views and concerns of the local communities. | This comment is noted. |

21 North Wales Fire And Rescue Service

| Table 20: North Wales Fire and Rescue | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | North Wales Fire and Rescue Service (NWFRS) will provide a response on the proposal, for a new high voltage connection in Anglesey and Gwynedd, as a whole with feedback considering the impacts the development will have on the organisation in terms of Traffic and Transport, Worker Accommodation and Emergency Arrangements. | This comment is noted. |
| 1. General Comments | 1.1 It is recognised that the project is closely associated with the proposed development of the Wylfa Newydd Power Station, and the opportunity and investment that the projects will bring to the area is welcome in both the medium and long terms. It is clear that the development has the potential for significant impacts for NWFRS. | This comment is noted. |
| | 1.2 NWFRS, as a designated public body, has a duty under the Well-being of Future Generations (Wales) Act 2015 to work towards sustainable development which is defined as a process of improving the economic, social, environmental and cultural well-being of Wales in order to help achieve the well-being goals. | This comment is noted. |
| | 1.3 It is noted that National Grid (NG) will be submitting a Development Consent Order (DCO) in relation to the proposed development between, and including, Wylfa Newydd and the Pentir substation and that it is anticipated that this will be submitted in late 2017. Further it is noted that NG have identified the need to reinforce the existing electricity network between Pentir and Trawsfynydd and that further details and consultation will take place in 2017 ahead of applications being submitted to the relevant bodies. | This comment is noted. |
| | 1.4 In the Preliminary Environmental Information Report (PEIR) ³ NG recognise the potential for the project to provide local contract opportunities although, due to the specialist nature of the work, this is likely to be limited to construction work. This must be seen in the wider context and the link between the proposals for Wylfa Newydd and the North Wales Connection and the cumulative impact on local employment and how this can have a detrimental impact on public service provision. | An assessment of cumulative effects is provided in Chapter 17 Socio-Economics (Document 5.17 , section 10), and includes consideration of effects on employment. |
| | 1.5 NWFRS operates differing duty systems, including a Retained Duty System (RDS), in providing fire and emergency cover in its area. NWFRS are concerned that offers of well-paid primary employment associated with the development, and the link with Wylfa Newydd, may have a significant impact on the operational response of NWFRS across the whole of North Wales. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |

³ Preliminary Environmental Information Report Chapter 16 Page 47, 5.6.2 - 5.6.4

| Table 20: North Wales Fire and Rescue | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | 1.6 NG identify that the proposed project will require significant capital expenditure ⁴ , and given the relatively specialist nature of the construction work the majority of this expenditure is likely to be outside the region, however with some expenditure in the region there is the potential for this to influence the supply chain and thus create some job opportunities. | This comment is noted. Expenditure and supply chain effects are assessed in section 9.11 of ES Chapter 17 Socio-Economics (Document 5.17). |
| | 1.7 The recruitment, selection and development of individuals who wish to join the RDS takes approximately six months in order that they may be deemed competent to attend operational incidents. Recruitment and retention of personnel currently present challenges and the employment opportunities, including cumulative interproject opportunities, will exacerbate this. | Employment effects are assessed in section 9.10 of ES Chapter 17 Socio-Economics (Document 5.17). An assessment of cumulative effects is provided in Chapter 17 (Document 5.17 , section 10), and includes consideration of effects on employment. |
| | 1.8 In addition to the challenges of ensuring operational response cover the scope of the project will have resource demand issues for NWFRS across its functions for the duration of the project. There will be a resource demand in responding to consultation responses and regulatory submissions, wider consultations, and work associated with the Wylfa Newydd development to which this project is clearly linked. The volume of work will be well in excess of normal levels and beyond existing resources. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | 1.9 Work will be required in regards to operational planning and preparation - both for Fire and Rescue Service (FRS) singular and multi-agency response, to respond effectively with potential incidents across a wide variety of risks during the build and operation of the connection. The demand on FRS existing resources will be excessive. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | 1.10 The proposed development of the new high voltage connection and its impacts is set against a backdrop of ever increasing pressure on public service budgets and the emergency services not being exempt or protected by financial ring fencing. Since 2011/12 NWFRS has cut its annual running costs by over £3.5 million and has managed to absorb many unavoidable cost increases from year to year. Most savings coming from workforce changes and cuts in general spending with very little or discernible change to the level of service that the public receives. Projections to 2020 ⁵ indicate a need to increase the budget by £2.3m to meet known pay and price inflation pressures. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | 1.11 The current provision for communications for the emergency services, nationally, will be changing in the near future with the replacement system being provided over the mobile telecommunications system. Given the scale of the development and the inevitable increase in the demand placed on the current mobile telecommunication system, NWFRS would require | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |

⁴ Preliminary Environmental Information Report Chapter 16 Page 47, 5.6.5 - 5.6.6

⁵ North Wales Fire and Wales Autumn 2016 and Rescue Authority Public Consultation Affordable Fire and Rescue Services for North

| Table 20: North Wales Fire and Rescue | | |
|---------------------------------------|---|---|
| Consultee and Section Reference | Comment | How the comment has been addressed |
| | assurances and potential mitigation to ensure that we can secure communication between our control room and appliances at incidents, and to ensure that citizens within the community can call the emergency services should the need arise. | |
| | 1.12 As a public body NWFRS has requirements placed upon it under the Equalities Act 2010, Public Sector Equality Duty. It is recognised that the potential population increase and cumulative inter-project impact, may place additional pressures upon public organisations with regards to citizens with protected characteristics as identified under the Act. Such impacts may be realised through workforce displacement and where replacing staff is compounded by the need to comply with other legislation e.g. Welsh Language Act. | Employment effects are assessed in section 9.10 of ES Chapter 17 Socio-Economics (Document 5.17). Cumulative effects on employment are assessed in section 10 of Chapter 17. Effects on the Welsh language are reported in the WLIA (Document 5.26). A WBR is also provided (Document 5.27). |
| 2. Traffic & Transport | 2.1 Operational fire cover on Anglesey is predominantly provided by RDS personnel with one Day Crewed station based at Holyhead. Within North Gwynedd fire cover is again predominantly provided by RDS personnel with two Day Crewed stations - Bangor and Caernarfon. NWFRS does have a concern on the potential impact that the increase in traffic may have on the ability of operational personnel to respond in a timely manner to their respective stations, when called out, as well as the impact on crews responding to the actual incident. This will require significant pre-planning to ensure that NWFRS have appropriate resources available and that our response to incidents, within our communities, is not impacted by the development. | An OCTMP (Document 7.5) has been produced and the detail consulted on with the North Wales Fire and Rescue Service. The concerns of the NWFRS have been listened to and have fed into the selection of Proposed Construction Traffic Routes. |
| | 2.2 The consultation document identifies that the new high voltage connection will have a significant transport requirement ⁶ with initial proposals presented on how this will be mitigated against. NWFRS broadly agrees that a Construction Traffic Management Plan (CTMP) is required in relation to the development and that Heavy Goods Vehicles (HGV's) exposure to the minor roads on Anglesey and near Pentir is kept to a minimum through the use of a temporary access road through the majority of the site. Given the number of HGV movements, and the probability that they are likely to originate from outside the region, it is suggested that the Transport Assessment (TA) and possibly CTMP consider traffic in a wider context, North Wales and possibly further afield, rather than be concentrated to the Bangor and Anglesey area. | An OCTMP (Document 7.5) has been produced and the detail consulted on with the North Wales Fire and Rescue Service. The concerns of the NWFRS have been listened to and have fed into the selection of Proposed Construction Traffic Routes. The scope of the Transport Assessment (Document 5.13.2.1) has been agreed with the relevant highway authorities, and does not extend beyond the Study Area defined in ES Chapter 13 Traffic and Transport (Document 5.13). |

⁶ Preliminary Environmental Information Report Chapter 12

| Table 20: North Wales Fire and Rescue | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | 2.3 Chapter 12 ⁷ of the PEIR identifies the A55 as a high capacity link road and that it is not anticipated that the proposed project will cause any significant impact. This does not appear to take into account that the works will be ongoing at the same time as construction of Wylfa Newydd and associated developments, and the associated traffic and transport requirements. The cumulative effect will undoubtedly impact on the A55 for the duration of the project. | Both the ES Chapter 13 Traffic and Transport (Document 5.13) and the TA (Document 5.13.2.1) include an assessment of the cumulative effects of the Proposed Development and Wylfa Newydd. |
| | 2.4 It is noted that it is proposed that construction activity will take place during a 12 hour working day, although it is anticipated that tunnelling will be a 24 hour operation ⁸ . The proposed working hours and subsequent commuting traffic is similar to that proposed for Wylfa Newydd and associated developments, which may have an inter-project cumulative effect. Some elements of the development will have significant HGV associated movements, some of which will occur outside normal working hours. These together with other vehicular movements associated with the whole development will have an impact on road safety and given the nature of the vehicles involved such Road Traffic Collisions (RTCs) will have an impact on the emergency services, other road users and the wider community. | The TA (Document 5.13.2.1) includes an assessment of highway safety in the context of current accident records within the Study Area and the forecast additional vehicle movements as a consequence of the Proposed Development. |
| | 2.5 The complexity of RTCs involving HGVs, MGVs, LGVs or other vehicles present technical challenges which require specialist equipment carried on Technical Rescue Units (TRUs). NWFRS will need to analyse the increased risk presented by the development to ensure that current resources are in the most appropriate locations or whether there is a need to relocate resources in order to meet the risk, which could have a financial impact on the organisation. | The TA (Document 5.13.2.1) includes an assessment of highway safety in the context of current accident records within the Study Area and the forecast additional vehicle movements as a consequence of the Proposed Development. The point about consideration of additional resources is noted. |
| | 2.6 It is anticipated that construction materials for the development, as well as spoil removal from pylon footings and tunnelling, will make use of A55, A5 and A487 to get on to and off Anglesey. Recent evidence has shown that incidents which have resulted in the closure of the A55 result in traffic utilising alternative routes, primarily the A5, and which can have a major impact on the road network. It appears that there is no evidence within the consultation documentation that this has been considered or what impacts it would have on deliveries or construction related HGV and MGV movements. Given that such closures may be prolonged and results in the build-up of traffic NWFRS would welcome the opportunity to comment on any arrangements with regards to impacts on NWFRS. | An OCTMP (Document 7.5) has been produced and the detail consulted on with the North Wales Fire and Rescue Service. In the event of primary routes being unavailable, some contingency routes have been identified. There is also considerable provision within the Proposed Development for the storage of materials and construction vehicles in the event that routes are unavailable or congestion makes it inefficient to travel. |

⁷ Preliminary Environmental Information Report Chapter 12 Page 3, 2.1.3

⁸ Preliminary Environmental Information Report Appendix 4.3 Preliminary Construction Traffic Management Plan (CTMP) Section 5 Page 25, 5.4.3

| Table 20: North Wales Fire and Rescue | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | 2.7 The documents and plans identify potential routes for use by HGV, MGV and LGV vehicles as well as routes solely for use by LGVs. Information is requested on what alternative transport proposals, including routes and how these will be policed and managed, NG would make in the event of a prolonged closure, of Strategic Road Network (SRN) and or Local Road Network (LRN) with the need to move materials and/or workers to and from work sites. The use of the LRN, and especially category B and minor roads will increase the risk of road safety being compromised. This risk will not be confined to road users associated with the proposed project and it is suggested that mitigation activities through engagement and education should be developed, including partner agencies, to cover the whole construction period. | An OCTMP (Document 7.5) has been produced and the detail consulted on with the North Wales Fire and Rescue Service. This includes the identification of mitigation measures to reduce the potential for traffic effects. |
| | 2.8 NWFRS would suggest that the use of the following routes are unsuitable for the anticipated number of HGV and MGV movements and that alternative routes are considered which will reduce the potential risks to road users: | This comment is noted |
| | 2.8.1 B5112 (A5 to Llanerchymedd) - the construction route strategy ⁹ may give rise to an alternative by utilising a short section of the LRN. | This route is identified in the OCTMP (Document 7.5) as being for the use of LGVs only. |
| | 2.8.2 B5420 Ceint to Four Crosses (Penmynydd Road) - alternative access to the construction compound located near Llangefni. It is suggested that use is solely made of the A55, A5114 and the Llangefni Link Road. | This route is identified in the OCTMP (Document 7.5) as being for contingency use in the event that the Primary route described in the comment is unavailable. |
| | 2.8.3 A4080 from junction with A5 at Llanfairpwll - this is a busy junction with a bridge over the railway and sharp bend within 100m of the junction | This route is identified in the OCTMP (Document 7.5) as being for initial enabling works, AIL movements and contingency use in the event that the Primary route is unavailable |
| | 2.8.4 B4547 from junction with Bangor Road - Nant y Garth - this is a busy road along which there have been a number of serious RTCs. It is suggested that use be made of the A4244 and B4547 to access the Pentir / Ty Fodol site. | This route is identified in the Outline Construction Traffic Management Plan (OCTMP) (Document 7.5) as being for initial enabling works, and contingency use in the event that the Primary route is unavailable |
| | 2.9 As identified above the project will have significant transport requirements, in addition to which, will need to include the commuting journeys of workers. NWFRS would welcome information as to what consideration has been given to the fuel requirements and whether the need for additional capacity, in infrastructure, has been identified. This will need to be considered in the context that the Wylfa Newydd project and all the associated developments will also have a significant fuel requirement. The increase in fuel demand may impact on availability to the existing community and | The numbers of staff associated with the construction of the proposed development is modest, and the impacts of this workforce, even in the peak period on the availability of fuel in the local area is considered to be negligible |

⁹ Preliminary Environmental Information Report Appendix 4.3 Preliminary Construction Traffic Management Plan Section 4 and Associated Plans

| Table 20: North Wales Fire and Rescue | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | could see an increase in the number of deliveries required across the region and thus increase the number of fuel tankers on the road network. | |
| | 2.10 It is noted that the number of HGV movements associated with the construction of the shafts (either side) and the tunnel will be significant and that it is anticipated that the tunnel will be constructed from the Anglesey side with the spoil being brought to the surface on the island. Reducing the number of HGV movements would assist in reducing the risk to road users and NWFRS would be interested in whether there is the opportunity for spoil, from the tunnel and pylon footings, to be removed by train given that the Braint tunnel head is in relative close proximity to the North Wales Coast Railway line. | The movement of excavated material by rail has been considered but does not form part of the Proposed Development. There is likely to be a need for at least some part of the journey for excavated material to be moved via an HGV, and the assessment considers that all excavated material will be transported via HGV, in order to represent a robust worst-case scenario. |
| 3. Worker Accommodation | 3.1 It is noted from the available information that the anticipated workforce involved in the project will be approximately 400 in total with the vast majority coming from outside the region and thus requiring accommodation. | An assessment of socio-economic effects is provided in Chapter 17 Socio-Economics (Document 5.17), and includes consideration of effects on tourism accommodation and the private rented sector (PRS). |
| | 3.2 The documentation suggests that project related construction staff would make use of available bed space within the tourism sector and/or private rental sector for the duration of the construction phase of the project ¹⁰ . Further it is noted that during discussions at community engagement events it was suggested that construction staff may club together and seek to engage with local land owners and pitch caravans in locations close to their workplace. | An assessment of socio-economic effects is provided in Chapter 17 Socio-Economics (Document 5.17), and includes consideration of effects on tourism accommodation and the private rented sector (PRS). The following control and management measure is included in the CEMP (Document 7.4): The contractor will establish a process to monitor where workers are staying by type of accommodation and location. The results of this monitoring will be provided to National Grid. |
| | 3.3 NWFRS are aware that Horizon are proposing a Construction Worker Accommodation Management Portal (CWAMP) designed to match workers with suitable accommodation that best suits their needs. It is assumed that the portal will be used to manage access to all accommodation types whilst ensuring that providers are aware of their statutory obligations. It is suggested that NG should collaborate with Horizon with regards to the CWAMP thus ensuring that construction staff can be signposted to suitable accommodation. | This comment is noted |

¹⁰ Preliminary Environmental Information Report Chapter 16 Socio Economics Page 48, 5.6.7

| Table 20: North Wales Fire and Rescue | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | 3.4 With regard to construction workers who would prefer to make use of touring caravans NWFRS would suggest that this is registered through the CWAMP which would provide an opportunity for engagement in passing on safety advice whilst also providing a mechanism for stakeholder agencies to map out areas of demand increase and thus identify suitable mitigation. | This comment is noted |
| | 3.5 NWFRS do have a concern that unscrupulous landlords will take the opportunity to make accommodation available to construction workers and would welcome the developers' view of how this will be addressed. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | 3.6 Whilst information is provided relating to the duration of the working day (see 2.4 above) there does not appear to be any indication as to the potential shift patterns which could allow an assessment to be made of the possible weekend effect i.e. construction staff returning home to their families for weekends etc. | Further information is provided in Appendix 17.2 Workforce Analysis Assumptions Log (Document 5.17.2.2) |
| 4. Emergency Arrangements | 4.1 It is noted that the consultation document does not make reference to any proposed emergency arrangements during the entire construction phase. It is evident from the information provided that robust response plans will need to be in place for dealing with any incidents. The developers need to enter into early dialogue with the emergency services to identify risks, the potential for emergency incidents and arrangements to reduce or mitigate them. | This comment is noted |
| | 4.2 The construction and operation of the service shafts and tunnel are of particular interest to NWFRS as they introduce new risks and demands in terms of skills/training and equipment should the need arise to respond to an incident. Some information is provided ¹¹ with regards to the maintenance of these areas with an indication that whilst personnel are present within the tunnel a safety team will be present. This is a risk that will need to be mitigated against requiring initial and on-going training, together with the provision of additional equipment required, and include regular site visits and familiarisation, with associated costs, for local crews. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |

¹¹ Preliminary Environmental Information Report Chapter 4 Page 15, 3.3.1

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22 North Wales Police

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| Table 21: North Wales Police | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | <p>I write to formally submit the views of North Wales Police (NWP) in relation to the North Wales Connection Consultation documentation.</p> <p>NWP is eager to continue the dialogue with National Grid (NG) and looks forward to building on this partnership to continue making a safer North Wales.</p> | This comment is noted. |
| | Overall the proposed scope of the assessment in the areas related to NWP is considered to be appropriate. There are however, some areas identified by NWP that we believe should have a wider consideration. | This comment is noted. |
| | In isolation, this project may not have a significant impact but when considered in the wider, as of yet not fully known, context of other developments being proposed in North Wales, the cumulative impact could be significant. We welcome NG's consideration of cumulative impacts but would request that a more joined up approach, particularly with Horizon Nuclear Power is taken. This request relates in particular around the areas of Construction Traffic Management, including staff travel and worker accommodation management. These areas combined could have a significant impact on the residents of North Wales and ultimately, NWP. | Cumulative effects with Wylfa Newydd related to traffic are considered in both ES Chapter 13 Traffic and Transport (Document 5.13) and the TA (Document 5.13.2.1) and accommodation in ES Chapter 17 Socio Economics (Document 5.17) |
| | NWP are of the opinion that worker Codes of Conduct should be developed for all involved in the project. This should include both individuals directly employed by NG and those employed by its sub-contractors. We believe that implementing a Code of Conduct would assist in reducing the potential demands placed on NWP from an influx of workers to the area. NWP would welcome the opportunity to work closely with the NG to develop this. | The need for a code of conduct is identified in the CEMP (Document 7.4) |
| | Based on the information received to date on all the 'Energy Island' projects, the inclusion of the tunnel works boring starting on Ynys Mon and the resultant increase in traffic would have a significant impact on the strategically important Britannia Bridge. Therefore the option of the tunnel boring starting on the mainland side, which would significantly reduce the burden on the Britannia Bridge, should be the preferred and chosen option. | Traffic impacts relating to all tunnelling scenarios are considered in ES Chapter 13 Traffic and Transport (Document 5.13) and the TA (Document 5.13.2.1) |
| | Prior to the construction phase, NWP has already seen an impact on the organisation from the work created by the need to assess and respond to the proposals. Regular project boards chaired by Deputy Chief Constable Pritchard are held to coordinate the increase in work. It is expected that this impact will significantly increase with the need for NWP to examine and comment on the Development Consent Order (DCO). NWP would welcome the opportunity to | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |

| Table 21: North Wales Police | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | discuss the implementation of a Performance Planning Agreement (PPA) between us and NG, this would allow us to mitigate the need for frontline staff to be withdrawn from operational duties to examine and respond to the application without detriment to the public of North Wales. | |
| | Overall the proposals need to ensure that NWP will be adequately resourced to ensure that policing is fully effective in the area and can cover all eventualities without detriment to the existing communities. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| Other comments | The key issues for the Police to deal with in relation to the development are: | This comment is noted. |
| Increase in Demand | <p>The influx of workers for the development will undoubtedly cause an increase in demand for NWP. Listed below are some of the issues NWP might expect and need to be considered prior to submission of an application by NG (this list is not exhaustive):</p> <ul style="list-style-type: none"> • Pressures from the increased night-time economy • Incidents and crimes on sites requiring police attendance • Increase in response times • Protest • Operational Planning • Roads Policing • Custody Capacity • Firearms and other specialist capabilities • Officer numbers and recruitment especially in specialist roles • Police station location and capacity • Translation services • Safe guarding the most vulnerable and those likely to be exploited | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |

| Table 21: North Wales Police | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | <ul style="list-style-type: none"> Cyber-crime¹² relating to both businesses and individuals during the build and operation. | |
| Traffic & Transport | <p>In addition we request that the below traffic and transport issues are considered further prior to submission of any application.</p> <p>Examples of areas for further consideration are as follows (NB. further issues may emerge as information comes to light):</p> <ul style="list-style-type: none"> Integrity of the Key routes including the A5025, the strategically important A55 including the Britannia Bridge How will keeping these routes open at all times be achieved? <ul style="list-style-type: none"> Daily congestion already occurs at the Britannia Bridge and in recent months the A55 has been closed a number of times due to incidents¹³ for up to 10 hours at a time Stacking/Staging areas along key routes, including on the mainland in the event of route closure A wider assessment of the A55 and A494 to the English border as both workers and goods will likely have to travel along these routes to the Island How Emergency Response times to incidents will be maintained E.g. recovery of broken down vehicles in areas of road works High level of compliance by all users along these routes Consideration of the need for average speed cameras or variable speed limit capability for the Britannia Bridge to reduce the likelihood of accidents and structural damage resulting in road closures from the increase in traffic Consideration should also be given to the impacts on other arterial routes off the areas of work including the suitability of alternative routes as local residents and others will seek to avoid traffic lights and disturbance wherever possible. Consultation on the alternative routes should also occur | <p>An OCTMP (Document 7.5) has been produced and the detail consulted on with the North Wales Police. This includes the identification of mitigation measures to reduce the potential for traffic effects, including speed restrictions in select locations.</p> <p>Traffic effects arising from the construction of the Proposed Scheme are reported in the ES Chapter 13 Traffic and Transport (Document 5.13) and the TA (Document 5.13.2.1).</p> |

¹³ Chemical Spill at Old Colwyn March 2016 10 hour closure. Conwy Tunnel Closure August 2016 2.5hr closure

| Table 21: North Wales Police | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | <p>both with North Wales Police and Isle of Anglesey County Council's Highways Department</p> <ul style="list-style-type: none"> NWP need to be Key Stakeholders Robust traffic management plan to control both staff and HGV movements both to and from the main sites and other works. | |
| Protest | NWP believe that if the consultation process and engagement with the local community is not adequately managed and detailed, it could lead to community tension and result in protests. The need to police any protest is resource intensive and costly to the organisation. NG should seek to retain the public support to minimise these issues. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | We await further dialogue and detailed mitigation proposals. | This comment is noted. |

23 One Voice Wales

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| Table 22: One Voice Wales | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| Representing the voice of the grassroots on Anglesey | In response to your statutory consultation regarding an additional pylon corridor to transmit electricity across Anglesey, this is the response of the One Voice Wales Anglesey Pylon Committee. One Voice Wales is the forum that represents town and community councils, and our membership represents 38 councils on Anglesey. So, when the Grid refers to consulting with local communities ("Before submitting an application, the Planning Act 2008 requires developers, such as National Grid, to carry out consultation with local communities") - One Voice Wales Anglesey Committee is the collective of those local communities. Our membership represents all the communities directly impacted by the proposed pylons. We meet regularly to discuss community matters, and such is our members' concerns and frustrations with the Grid's consultations and pylon plan, that a specific committee has been set up to deal solely with the pylon issue. We expect therefore that this response is accorded the respect and weighting it deserves, being sent to you from the representatives of all the local communities directly impacted by the National Grid proposals. | This comment is noted. |
| Diverse areas but unified in response | <p>We know that all the individual local communities will have their own particular concerns and priorities and that you will have got to understand these since starting the consultation process in 2012, however there remain aspects upon which all the Anglesey councils are united. Our responsibility therefore is to communicate, on behalf of our members, the viewpoints upon which there is unanimous agreement on Anglesey, namely:</p> <ul style="list-style-type: none"> • TOTAL OPPOSITION TO ANY NEW PYLONS ACROSS THE ISLAND • Request for alternative transmission methods to be sought, such as undergrounding or subsea • That this has been a flawed consultation since 2012 | This comment is noted. |
| We oppose the proposed application on the following grounds: | <p>1 Lack of credibility in the consultation process</p> <p>1.1 A consultation focusing on micro aspects whereas the macro aspects haven't been resolved Because of the opposition to more pylons and the fact that the Grid, since 2012, has denied us the opportunity to influence the process of selecting an acceptable transmission option, it's difficult to respond to the details of a proposed option that we have had no part in formulating. This also contravenes the Grid's own guidance:</p> | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |

| Table 22: One Voice Wales | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | "Consulting widely, effectively and at a formative stage of our project proposals". So, despite the overwhelming opposition to the pylon proposal in the first two consultations, this is the third time the Grid has proposed the pylon option. As one local councillor expressed in frustration: The only thing the Grid is offering Anglesey in their consultation is "the choice of being executed by hanging or shooting". | |
| | 1.2 The Grid further undermines the credibility of the consultation process In the eyes of the public, the consultation process has undermined the whole credibility of this third consultation. Operating as a monopoly on behalf of the government, the Grid has been highly irresponsible in ignoring the viewpoint of the people being consulted, to the extent that most of the public have lost faith in the process and the purpose of consulting. Indeed, it is a common belief that the Grid had deliberately induced consultation fatigue to ensue an ever-diminishing number of responses as their consultations are repeated, so that by the time they reach this third and statutory consultation, the population's despair in the process can be misrepresented as lack of opposition to pylons. Despite all claims by the Grid to be listening, made in publications that seem aimed at communicating to the Inspectorate rather than communicating with locals, we realise that it's advantageous to the Grid's if consultation fatigue leads to fewer responses. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | 2. Lack of detail in the consultation documentation and Grid staff responses 2.1 Menai Crossing including all-important aspect such as the tunnel entrance. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | 2.2 Detailed costing for the proposed option in order to check and compare with other options, including the costings for the lifetime of the equipment and the maintenance cost. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | 2.3 Risk assessment for the different options, risk to the islanders' safety as well as the safety of electricity supply, including the risk from accidental damage or act of terrorism. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | 2.4 The Grid's statements do not reflect the reality of the consultation experience. "These events will be staffed by National Grid project team members from various disciplines, including construction, environment, lands and engineering." Despite the emphasis on the documentation during the consultation, in order to engage with hard-to-reach audiences the quality of the verbal exchange is important as well. Examples of lack of expertise at a consultation venue during these exchanges include the Senior Project Manager ignorant of a) Well-being of | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |

| Table 22: One Voice Wales | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | Future Generations (Wales) Act 2015 b) whether any meeting had taken place between National Grid & Horizon to ascertain the safety case of two vulnerable row of pylons being sole transmission route for a nuclear power station c) the economic impact of the pylon proposal on the local tourism industry – believing that generic market research done in another part of the UK would suffice. These are only examples of the calibre of responses from only one drop-in session during this third consultation. | |
| | 2.5 By consulting on such a significant matter as connection to a nuclear power station, and since pylons are the Grid's proposal, an option which to the public seems the most vulnerable of the three especially when compared to undergrounding, it isn't acceptable that Grid responds on paper and verbally that the security of supply issue is not their problem. "Terrorist Threat. We have an obligation under our system license to ensure appropriate security and quality of supply for generation connections. A second connection from Wylfa Newydd complies with these standards. Within these standards there is not a requirement to consider terrorist threat, this is the responsibility of the generator to consider the potential for losing all connections." | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | <p>2.6 Grid reluctance to disclose significant facts that impact the consideration of their proposal e.g. in the Feedback Report, which should form the basis of the proposal for the third consultation, the following is not clarified:</p> <p>2.6.1 Over 90% of responders expressed their opposition to the Grid's pylon proposal in the first and second consultations. This is presented in vague wording: "Some respondents express support for the consultation process stating that it was well organised and gave them an opportunity to express their views. Others raise concerns regarding individual elements of the process such as the event locations, the information provided or materials used. However, many respondents express scepticism about how much influence the consultation will have on the eventual decision taken by National Grid."</p> <p>2.6.2 Where is it recorded that all democratically elected representatives of the people of Anglesey, MP, AM, County Councillors, and community/town councillors, oppose any new pylons on the island? Instead the Grid is trying to undermine the authority and weight of these democratically representative voices by treating them as individual responses: "No conclusions can be reliably drawn about any population's views beyond those who responded to the consultation."</p> | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |

| Table 22: One Voice Wales | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | <p>2.6.3 In their public communication, the Grid presents the amendment to the Menai crossing as being in response to public feedback: "National Grid is developing alternative proposals involving the use of underground technologies so as to avoid or mitigate the most significant landscape and visual effects in the area. This takes account of feedback received in response to our Stage 1 consultation." Yet the company knew from the outset in 2012 that this was an Area of Outstanding Natural Beauty, so the main reasons for the amended plan is because of the Holford Rules restrictions: "National Grid recognises that the Anglesey AONB and Menai Strait area are sensitive locations, where planning policies and National Grid's statutory duties count against the use of an additional overhead line."</p> <p>2.6.4 Despite referencing the media as a communication tool, listing the Grid's own announcements, "a press release was issued to key media throughout the project area", there is a total failure to share everything else that's appeared in print and on the media during these consultations, extensive coverage which indicates the united public opposition to more pylons.</p> <p>2.6.5 Reluctance to admit that it is not possible to screen these 47m-high pylons on the flat landscape of central Anglesey.</p> <p>2.6.6 Concealing the fact that there's already been conflict on the island with the Grid threatening a £5,000 fine on landowners for not returning land access documentation. There is no information regarding the number of owners who will refuse to cooperate with the Grid, instead a state of content cooperation is implied: "We've had lots of discussions with landowners along the route."</p> <p>2.6.7 It is not disclosed in the documentation that there will not be any longterm jobs benefit from the pylon option (apart from "one possibly two").</p> <p>2.6.8 It is not highlighted that anything verbalized in a drop-in session will not be included as feedback. To most ordinary people this is not obvious - they come to "have your say" without understanding that no record will be made of what they said unless they write it themselves on the feedback form.</p> <p>2.6.9 It is not clarified that the population of Anglesey live in a European designated area of socio-economic disadvantage. It is also an area which already pays one of the highest UK rates for electricity on the basis of the cost of transmitting the electricity back to North Wales.</p> | |

| Table 22: One Voice Wales | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| 3. Cost | 3.1 The Grid has not kept to its commitment of transparency: "Being open with information and transparent about the judgements we make". Since 2012, whilst consulting with local communities, the Grid has insisted that pylons are much 'cheaper' than other options. Yet they haven't provided the full data to back this up e.g. full costs of crossing the Menai Straits and the calculated expenditure on compensation for landowners whose property is traversed with these lines. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | 3.2 Grid has declared since 2012 that the pylon option has been chosen based on costs alone, although the feasibility study indicates other possible options such as undergrounding and subsea cables. This is contrary to the Grid's own guidance: "We have no inherent preference for either overhead or underground approaches". | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | 3.3 The Grid has not achieved this: "We consider environmental, socioeconomic and technical issues alongside a capital and lifetime cost for each strategic option." Included in the quoted costs the Grid should consider technical costs, mitigating costs, compensation and land purchase costs and lifetime costs of the technology. Since the company claims that one option is cheaper than another option, it should be expected that the full data is provided to allow for cost comparison. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | 3.4 Likewise, it is expected that a cost-benefit analysis would be provided to show the impact of the pylons during the technology's lifetime, in order for a meaningful comparison with other transmission methods. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | 3.5 The Grid in this consultation, although we have asked in all previous consultations, is playing semantics with the word 'cost' without distinguishing between the technical cost of the development to the Grid/UK electricity consumer and the 'cost' to the inhabitants of Anglesey, namely the people being consulted. The costs of impacts throughout the lifetime of the technology should be included. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | 3.6 We disagree with the Grid statement that their consultation: "helps local people understand better what a particular project means for them, so that concerns are resolved early". The Grid does not acknowledge the heavy cost burden placed on the property/land owners adjacent to the cables/pylons, and there is no data to reflect the impact of the proposed project on the property values on Anglesey. Instead the words "perception" and "potential" are used to undermine the case for property value impacts on Anglesey: "National Grid recognises that there is a perception that our work could have a potential effect | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |

| Table 22: One Voice Wales | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | <p>on property values... National Grid does not provide compensation to cover any perceived reduction in house value." However, the Grid is well acquainted with the calculation of the loss of property value as demonstrated previously in 2006 by the scientific advisor to the National Grid: "Up to £7 billion will be wiped off property values if the Government accepts the advice of experts that homes should no longer be built near overhead power lines because of possible links with childhood leukaemia. _</p> <p>About 130,000 houses could lose between 10 per cent and a quarter of their re-sale price if ministers take the advice of a committee set up by the Department of Health. The confidential document, written by John Swanson, the scientific adviser to the National Grid, considers the option of compulsorily buying all 75,000 homes in England and Wales that are affected. _The draft report acknowledges that implementing this as a policy could wipe a quarter off the value of 25,000 homes within 230ft of 400kv and 275kv overhead transmission lines and some 10 per cent from the value of 55,000 houses within 460ft of them. It also admits there could be a reduction of 15 per cent in the value of 50,000 homes within 100ft of the lower voltage 132kv power lines. Sage includes representatives of the DoH, the National Grid, the Health Protection Agency, the Office of the Deputy Prime Minister and the Council of Mortgage Lenders. Academics from the University of Bristol and Nottingham Trent University are also members, as well as a number of campaigners from groups committed to highlighting what they believe are the potential dangers of electromagnetic fields. Nicholas Ashe, of Property Vision, a leading firm of country house and estate buying agents, said the potential loss of value to properties could be even greater than Sage's working group predicts. He said: "The higher the value of the house, the greater the impact. We are talking about reductions of up to 50 per cent." http://www.telegraph.co.uk/news/uknews/3339019/Pylon-cancer-fears-put-7bnblight-on-house-prices.html</p> | |
| 4. Environmental impact | <p>4.1 The evidence shows the inequity of the Grid's treatment of Anglesey, having ignored the AONB designation in 2012 and now ignoring the UNESCO GEOPARK designation. This is contrary to Grid decisions in other areas in the UK. "In what circumstances will National Grid now underground new electricity lines? The presence of highly valued landscapes such as National Parks, Areas of Outstanding Natural Beauty and other nationally important areas."</p> | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |

| Table 22: One Voice Wales | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | 4.2 Noise impact - the Grid does not acknowledge islander's complaints regarding the noise impact of existing pylons, and doesn't clarify the noise impact scenario of two parallel lines. | Consideration has been given to noise resulting from both the existing and proposed overhead line in Chapter 16 Operational Noise (Document 5.16) |
| | 4.3 EMFs - Without communicating its intention with the public, the Grid applied to the Planning Inspectorate to exclude the impacts of EMFs from the Environmental Statement. Now the Grid will be supplying a report on its own terms without expecting the same acute scrutiny as a report included in the ES nor having to relate the report to the local context where there is extensive experience with the impacts of EMFs. However, this goes against the public understanding of the Grid's expressed intentions during the Second Consultation. It was understood by the public and One Voice Wales members, from responses given by the Senior Project manager, at a public meeting convened by the MP, that the Grid would do further research into the local health impacts and the concerns about EMF impacts in areas with pre-existing pylons on Anglesey e.g. the street, commonly called "Cancer Row", which has pylons/cables running alongside the houses with some as close as 10m to the pylons/cables. | EMF information is presented in the EMF Report (Document 5.25) |
| | 4.4 It also appears that the Grid is also ignoring the local communities' requests for them to present research on more specific local aspects of the EMF impacts such as: 1) the impact of EMFs when two pylon corridors are in close proximity and 2) the relationship between the impact of EMFs and Radon gas, which is high on the island and in the homes and deserves further research in the context of EMF impacts. | EMF information is presented in the Electric and Magnetic Fields Report (Document 5.25) |
| 5 Socio-economic impacts | We strongly disagree with the Grid's statement: "We're committed to ensuring our community consultation is accessible, understandable and meaningful." We believe that the consultation process has denied us the opportunity to highlight the socio-economic injustice that will result from the Grid's attempt to impose pylons on Anglesey: | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | 5.1 There is a democratic deficit in that the democratic voice of the people of Anglesey is being ignored: the MP, AM, County Councillors and all the community and town councils. These have local expertise about the possible socio-economic impacts of pylons on Anglesey. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | 5.2 In the first consultation, the Grid ignored the responses of 92% of the responders who said they were against the pylon option. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |

| Table 22: One Voice Wales | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | 5.3 The unanimous opposition to pylons as expressed in the local and national media has been ignored. To date only paid officials have ever been found to speak on behalf of the Grid's proposal - the Anglesey public well understand the socio-economic impact of the pylon proposal | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | 5.4 The three meetings that we as Unllais/One Voice Wales have had with the Grid (since 2012) have all been problematic. These were the forums where we expressed our concerns about the socio-economic impacts but problems included 1) short-notice 2) failure to provide translation equipment 3) failure to record/share our verbal feedback in the meetings, and although after the first meeting we insisted that they take minutes and they promised to share them, we are to this date still awaiting any meeting minutes from the Grid. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | 5.5 Given that Anglesey is a socio-economically disadvantaged area, our dependence on the tourism industry is greater than any other area in the whole of the UK (ONS) and yet the Grid has failed to provide an impact assessment of their proposal on the local tourism sector. The industry is already worth over £260 million. However, the impact assessment should also include the impact of restricting the potential growth in this sector in a fiercely competitive global market for the many decades to come. Likewise, the short-term and the long-term on the agriculture industry should also be assessed including the impact of land restrictions for the next 80 years. | ES Chapter 17 Socio-Economics (Document 5.17) takes a multifaceted approach to assessing potential socio-economic effects of the Proposed Development on tourism, including: <ul style="list-style-type: none"> consideration of individual receptors (such as tourism businesses, tourist attractions, recreational resources and PRoW), assessing the potential effects on them arising from visual, noise, air quality or traffic and transport impacts, in isolation or in combination. the assessment of potential effects on the availability of tourism accommodation as a result of construction worker demand. the assessment of potential effects on labour availability in the tourism sector. the assessment of potential effects on the wider tourism sector that could result from changes in visitors' behaviours or perceptions of the area. This has informed by the outputs of a bespoke Visitor Behaviour Survey. |
| | 5.6 The Grid stated in the Second Feedback Report: "The potential environmental and socio-economic effects of the Project, including potential effects on tourism and businesses, are being considered throughout the route selection and design process." One Voice Wales representatives have asked in every consultation for the data that supports this statement, no data has been presented to support this. In the second consultation, for example, none of the senior officers present in our meeting, including the senior project manager, knew the value of the Anglesey tourism sector, although this was common knowledge in the press and on the Isle of Anglesey Council's website. Since the | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |

| Table 22: One Voice Wales | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | Grid yet again cannot provide any local data on tourism in this third consultation, there is no basis for their claim in the statement above. | |
| | 5.7 Since the Grid's argument for pylons is to save costs for the UK, it's totally unacceptable to avoid revealing the 'costs' to the local property and landowners adjacent to the proposed new pylons. "In common with planning decisions generally, possible effects upon property value is not a material consideration in the consenting process... the Environmental Impact Assessment will not take property devaluation into account". In essence then, in an area of socio-economic disadvantage, the Grid has decided that the losses to these people, which could be between 10%-50% of the value of their property, should be ignored in order to subsidise cost savings in areas of greater prosperity elsewhere in the UK. The absence of data to measure this loss on property value on Anglesey, due to the announcement of the pylon plan and its potential implementation, has been noted previously in this document. But when referencing savings to be made in more prosperous areas of the UK, it is a serious flaw in the Grid's proposal not to acknowledge and quantify with data the significant fact that these proposed savings elsewhere are planned at the expense of people living in one of the most socio-economically deprived area of the UK. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| 6 Impact on the Welsh language and communities | 6.1 This proposal could have serious impacts on the Welsh language particularly as the geography indicates it will affect the areas where Welsh is still a sustainable community language with the highest percentage of Welsh speakers. | An assessment of potential effects on Welsh Language is provided in the WLIA (Document 5.26). |
| | 6.2 If a farmer must sell up because of the impact of this project, it can lead to the loss of one more Welsh family in the area with the associated impact on the local school and community. On the other hand, the non-Welsh-speaking guest workers, and their families who will follow, could add to the linguistic imbalance in the island's schools and communities. ("The main construction works are expected to take place over a four-year period (2020-2024), with the majority of the workers coming from outside the region"). | An assessment of potential effects on Welsh Language is provided in the WLIA (Document 5.26). |
| | 6.3 Given the short-term employment prospects, these workers are unlikely to seek to root their families and children in the local community by learning Welsh. "There is potential for the proposed development to impact (positively or negatively) on the communities within the study area through the introduction of additional workers. The number of construction workers would fluctuate throughout the construction programme, and is expected to peak at around 400. | An assessment of potential effects on Welsh Language is provided in the WLIA (Document 5.26). |

| Table 22: One Voice Wales | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | The main construction works are expected to take place over a four-year period (2020-2024), with the majority of the workers coming from outside the region". | |
| | 6.4 The census shows that there's a regular decline in the percentage of Welsh speakers on Anglesey. With these 400 more workers, as well as the cumulative effect of workers for other developments on the island, the Grid's proposal will contribute to further decline, and the unsustainability within its natural communities, of one of the oldest languages in Europe. We see no detail as to propose investment to ameliorate the impact of these workers on our local communities. | An assessment of potential effects on Welsh Language is provided in the WLIA (Document 5.26). |
| 7 Impact on health | 7.1 Despite confirming locally that they would do so, the Grid is now avoiding its commitment to undertake a local study as to the high level of illnesses such as leukemia and cancer associated with the existing pylon path on the island, a path that is closer than 60m to homes along the route. The Grid has heard directly from individuals about their experiences with childhood leukemia. Understandably, far from reassuring, this U-turn has caused more anxiety about the health impacts of EMFs, including factors such as the potential health impacts of EMFs combined with Radon gas (which is very high on Anglesey) and the health impact of EMFs emitting from two parallel lines. It is our opinion that the 'precautionary approach' would be appropriate in this situation where circumstantial evidence indicates uncertainty about the scale of the impact of EMFs on health. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | 7.2 The Grid was asked to work with the Health Board to research the high incidences of illness along the existing line, but there is no evidence that the Grid has done this: "National Grid gives health considerations a high priority in the process used to develop proposals for new electricity circuits. National Grid will work with the relevant authorities to ensure the safety of local communities." | A WBR (Document 5.27) has been prepared in conjunction with IACC. This describes the potential effects of the Proposed Development in relation to the goals for well-being as set out in the Well-being Act. |
| | 7.3 We disagree with the Grid's statement: "National Grid adopts a very open position on EMFs National Grid believes complete openness with information is one key way to help reduce stress." The successful application by the National Grid to the Planning Inspectorate to withdraw the impact of EMFs out of the Statutory Environmental Statement, has increased the concerns of the people of Anglesey that the Grid is anxious to hide data about the impact of EMFs on health locally. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |

| Table 22: One Voice Wales | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | 7.4 We do not agree that the Grid is proceeding according to "precautionary policies": "Health considerations are given a high priority in the process by which we arrive at any proposals for new electricity circuits. Assessment of compliance with national guidance and policies is key to our approach. The UK has a carefully thought out set of policies for managing EMFs, which includes both numerical exposure guidelines to protect against established, acute effects of EMFs, and precautionary policies to provide appropriate protection against the possibility of chronic effects of EMFs at lower levels, including, specifically, the possibility of a risk for childhood leukaemia." We have outlined previous experiences on this island which indicate a link between illnesses and proximity to the existing pylon route, we have also referred to the Grid's change of heart regarding a local health impact study, all the indicators are then that until further research is undertaken the "precautionary principle" should be applied which would favour subsea or underground cables. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| 8 Impact on law and order | 8.1 The Grid's proposed pylon plan contravenes many policies, principles and even law, which will lead to frustration by the law-abiding public that depends on law and democratic order for the state to arrive at fair decisions. | A Planning Statement (Document 7.14) has been prepared. This document demonstrates the Proposed Development is in compliance with national policy. |
| | 8.2 The response from the Isle of Anglesey County Council clearly indicates how the Grid's proposal contravenes the Local Authorities planning guidelines. | A Planning Statement (Document 7.14) has been prepared. This document demonstrates the Proposed Development is in compliance with national policy. |
| | 8.3 It is a statutory requirement that the Grid's plans conform to the Well-being of Future Generations (Wales) Act - yet public evidence shows that the Senior Project Manager was unaware of this statutory requirement until 26/10/2016. Apart for one long term job, the pylon option, especially compared to other options, brings only negative impacts to future generations based on impact on heritage, leisure amenities, health, property value, and the sustainability of tourist and agricultural SMEs. The impact of the pylons on Anglesey also contravene the Grid's own guidance: "We also have a duty to 'consider the desirability of preserving amenity' when undertaking projects which includes impacts on communities, landscape and visual amenity, cultural heritage and ecological resources." | An Amenity Assessment has been undertaken which considers all communities within the Study Area. No significant effects have been identified. Details can be found in Appendix 17.1, Document 5.17.2.1 . A WBR (Document 5.27) has been prepared in conjunction with IACC. This describes the potential effects of the Proposed Development in relation to the goals for well-being as set out in the Well-being Act. |
| | 8.4 A proposal with such local opposition should not be rubber stamped by the government, since the Grid's flawed consultation could lead to conflict with the peaceable people of Anglesey. For example, in a public meeting before the elections for Assembly Members, each candidate announced that they would be | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |

| Table 22: One Voice Wales | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | protesting at the farm gates if the Grid starts imposing compulsory orders on unwilling farmers, with the candidate for one of the main UK parties announcing that she would be one of the ones chained to the gate. It is unacceptable that even the political leaders of Anglesey are losing faith in the ability of the democratic processes to protect our rights and witnessing this democratic deficit through the eyes of a young person will seriously undermine their faith in political systems. | |
| | 8.5 Likewise, there will be an impact if the police are used to criminalise the ordinary people of Anglesey in order to protect the interests of a private company that's misusing its monopoly powers. This situation will also impact the public, especially young people's views on the function of the police, and particularly on the misuse of police resources to prop up multinational companies, when they're being funded by local communities. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| 9 Possible impact on health | In this consultation, the Grid has failed to provide an impact report on the safety of having two parallel lines (which could be taken out by accident or deliberately) being the sole transmission corridors to and from a nuclear power station. Since the Grid is the proposer of pylons, refusing to consider what would seem like safer options which would provide diversity of transmission, it is unacceptable that they refuse to provide information on the safety case of their pylon plan. Declaring that "there is not a requirement to consider terrorist threat" is simply not good enough. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| 10 Cumulative impact | 10.1The Grid uses the existing lines as justification for another corridor of pylons to run parallel. The existing outdated row of pylons scars the Anglesey landscape. Adding a second row will change the scarred agricultural landscape to become an industrial landscape, thereby forever impacting the ability of the whole island, from Beaumaris to Holyhead, to maximize Anglesey's extraordinary tourism potential. | Landscape effects are presented in Chapter 7 Landscape Assessment (Document 5.7) and tourism effects are considered in Chapter 17 Socio-Economics (Document 5.17) |
| | 10.2Furthermore, by using that argument, the Grid proves the point that by having a second row of pylons, they simply open the door to future generators claiming that a third pylons corridor will likewise be acceptable given the pre-existence of two already. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| Conclusion | There is no evidence of a 'meaningful' consultation by the Grid regarding their proposed pylon plan: "In bringing forward this Project, National Grid aims to | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |

| Table 22: One Voice Wales | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | ensure effective, inclusive and meaningful engagement with the local community, statutory and other consultees, and interested parties." | |
| | Neither is there evidence that the company has adhered to its own claims: <i>"National Grid is committed to engaging those communities affected by its proposals in effective and meaningful consultation as reflected in its Stakeholder, Community and Amenity Policy which incorporates National Grid's Schedule 9 Electricity Act 1989 Statement relating to the preservation of amenity. It makes the following commitments to consultation when undertaking electricity works:</i> | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | <i>"We will promote genuine and meaningful stakeholder and community engagement.</i> Not by consistently ignoring public responses and failing to acknowledge the cost of their proposal to the island. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | <i>We will meet and, where appropriate, exceed the statutory requirements for consultation or engagement.</i> They have clearly failed to gather and communicate the relevant data to prove that pylons are the best option. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | <i>We will adopt the following principles to help us meet this commitment: a) we will seek to identify and understand the views and opinions of all the stakeholders and communities who may be affected by our works;</i> Grid has not sought a meeting with Unllais/One Voice Wales in this their statutory consultation, and without minutes there is no evidence that the previous One Voice Wales feedback in meetings has been fed back to senior management and decision-makers. Furthermore, within a 4 year period we have had 3 changes of Senior Project Manager, each making personal commitments that will not be kept. And each in his turn showing a lack of basic understanding about facts, public opinion, and the potential impacts of pylons on the people of Anglesey. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | <i>b) we will provide opportunities for engagement from the early stages of the process, where options and alternatives are being considered and there is the greatest scope to influence the design of the works;</i> We didn't have the opportunity to influence the design of the plans on Anglesey. The Grid brought us one option only to consult on in the first consultation, knowing full well that this was not the best option for the people of Anglesey. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |

| Table 22: One Voice Wales | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | <p>From the outset, they implied that there was no point resisting their plans because they warned: even if every community, town and local council, the Assembly Member and the Member of Parliament, even if the Welsh Assembly objected, it wouldn't influence the decision because the decision will be made in London. So, limiting the options to one was deliberate because it was clear that this option was not in the Island's best interest. In our first meeting with the Grid in 2012, the Senior Project Manager, Martin Kinsey, confirmed that: "It's right for Anglesey to put it into the sea." "If I was living on Anglesey I'd want undersea cables as well."</p> | |
| | <p><i>c) we will endeavour to enable constructive debate to take place, creating open and two-way communication processes;</i></p> <p>The Grid's communications are one directional only. The Grid communicates its messages and record their communication processes for their application, but as noted above the Grid does not record or communicate the significant opposition by democratically representative voices, voiced in the media, or by individuals who share their experiences e.g. of leukaemia.</p> | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | <p><i>d) we will ensure that benefits, constraints and adverse impacts of proposed works are communicated openly for meaningful stakeholder and community comment and discussion."</i></p> <p>The above evidence demonstrates that this is untrue. The Grid hasn't collected and shared all the data on the negative impacts locally e.g. tourism, agriculture, property value, health, and the well-being of future generations.</p> | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | <p>In essence this application goes against natural justice. When it is clarified that Anglesey already is already going to be hosting energy generating facilities that will benefit the whole of the UK, it is only fair to expect a proportionate investment by the UK into the infrastructure that will transmit this electricity. The National Grid's application belittles the landscape of Anglesey and is an insult to the inhabitants who already, in their electricity bills, pay for mitigating solutions, such as subsea cables or undergrounding, in other parts of the UK. Indeed, despite being an area of great socio-economic disadvantage, Anglesey is one of the areas that already pays most for its electricity. We cannot accept such a highhanded attempt to impose further deprivation and disadvantage on the electors of Anglesey and on the future generations. We frequently hear references to 'Tryweryn' and 'Aberfan' when the public refer to this misuse of</p> | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |

| Table 22: One Voice Wales | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | powers by a private company against the interests of the people of Anglesey in terms of inheritance and health. | |
| | We have high hopes that the government will not allow the power of the state to force further poverty onto our area, thereby crushing the sustainable growth and potential of our local SMEs, especially in the all-important tourism sector. | This comment is noted. |
| | We also enclose a copy of previous correspondence, as part of this consultation response, since it shows evidence of how the Grid has failed to address our concerns. | This comment is noted. |
| Table 23: One Voice Wales Arfon Dwyfor Area Committee | | |
| Consultee and Section Reference | Comment | How the comment has been addressed |
| Response on behalf of the One Voice Wales Arfon Dwyfor Area Committee | The Arfon Dwyfor Area Committee, representing Town and Community Councils in Arfon and Dwyfor, met on 14 December 2016 to discuss the Grid's latest proposals. It was decided unanimously that the best means of transferring the electricity from the proposed new Wylfa Power Station to the National Grid would be by an undersea cable from Wylfa to Deeside. This reinforces the Committee's views put forward at the previous consultations on the issue. | This comment is noted. |
| | On 22 November 2012 a joint meeting of the Once Voice Wales (OVW) committees for Anglesey, Arfon and Dwyfor and Meirionnydd was held to discuss the National Grid's first proposals of the use of overland pylons. We unanimously agreed to oppose the plans for overland cables and recommended that the electricity should be transferred using undersea cables. The majority views from the public supported this approach at the time but they were completely rejected by the National Grid on the grounds of cost. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | During the second consultation at the end of 2015 the Grid proposals were again discussed at the OVW Arfon/Dwyfor Committee. It was agreed to inform the Grid that we were still against overland cables and urged the Grid to consider the undersea option again. At one of the Grid meetings during this period it became clear that the Grid was responsible to their regulator, OFGEM, to obtain the cheapest solution. I learnt that they were able to place underground cables across the Glaslyn estuary thanks to OFGEM's "Visual Impact Provision Project". The Arfon/Dwyfor Committee agreed that I should write to OFGEM to make the case for using this fund to enable the Grid to use undersea cables. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |

| Table 22: One Voice Wales | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | The reply from OFGEM stated that they had no role in the planning applications. Once the plans for the construction and the delivery routes had been agreed by the planning authorities it was then up to OFGEM to decide the "level of costs the National Grid should be allowed to recover from consumers." This is covered in OFGEM's Fact Sheet 109. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | <p>The case against the additional new pylons for overhead cables is primarily based on:</p> <ol style="list-style-type: none"> 1. The health dangers to the residents living near the Pylons. 2. The unsightliness of these pylons will have an effect on both the residents of Anglesey and Northern Gwynedd and also on to tourists. The area depends heavily on the tourist industry and the proposals would have a serious effect on the livelihoods of people involved in the tourist industry. 3. The disruption and inconvenience caused by the work of erecting the pylons. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | Whilst the current consultation is primarily based on the path of the pylons across Anglesey it must be remembered the proposals also include pylons to Pentir and the additional transmission requirements to Trawsfynydd including the construction of a new sub-station near Bryncir. The proposals will therefore also impose the above dangers to the residents of northern Gwynedd. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | It is recognised that the undersea cable will be more costly than overhead cables but as the electricity from Wylfa is to be used mainly by the UK residents outside northern Wales it is right that the costs should be shared between all UK electricity users. It is considered to be totally unfair that the costs in terms of the three issues mentioned above should fall entirely on the residents of Anglesey and northern Gwynedd. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |

24 Orthios Group Holdings Limited

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| Table 243: Orthios Group Holdings Limited | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | The Orthios Group is developing an Ecopark at Holyhead which includes planning consent for up to 299MW of generation and two of its subsidiaries hold connection agreements at our Penrhos substation. This letter is our formal response to the consultation. | This comment is noted. |
| | Whilst our activities and grid access are clearly impacted by the North Wales Connection project, we do not wish to make a formal objection to the proposed solution. However, we understand and are sympathetic to the objections raised by the local council. We believe route diversity using the designated yellow or purple corridors holds greater benefit than the doubling of overhead lines and towers in the current preferred solution. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | We appreciate this is a single generator connection study, but, in the wider context of electricity infrastructure on the island, believe there are alternatives with greater socioeconomic benefit. In this respect, we would like to work with National Grid in re-examining the alternative solutions. Specifically, we support the upgrading of the existing 132kV line between Wylfa and Penrhos to 400kV. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | A new 400kV route across the western side of the island including a new grid supply point would be beneficial for local consumers and for the wide range of smaller prospective power developers associated with the Energy Island project. It could also support further off-shore marine and wind capacity, which is a key objective for both regional and national governments. Without such key infrastructure the hurdles to development for any single new project are potentially insurmountable, leaving this great opportunity for growth and energy security untapped. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | Furthermore, the new grid supply point would offer the potential to relieve congestion and avoid additional powerlines across Snowdonia and/or the north coast of Wales by establishing a connection point for a North-South Wales offshore cable, which is under consideration in the National Grid Network Options Assessment. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | As owner of the Penrhos substation and its surrounding brownfield industrial land, we are willing to co-operate with National Grid in developing a 400kV substation at the site. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |

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25 Pentir And Y Felinheli Community Council

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| Table 254: Pentir and Y Felinheli Community Council | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| Background | <p>A meeting was held on 1st December 2016 between representatives of the National Grid and members and officers of Cyngor Cymuned Pentir Community Council and members of Cyngor Cymuned Y Felinheli.</p> <p>The meeting was held at the offices of Cyngor Cymuned Pentir, Uned 15, Llys y Fedwen, LL57 4BL</p> <p>The Community Councils welcomed the opportunity to discuss the project with National Grid.</p> | This comment is noted. |
| | National Grid explained that the Connection Project was required for the proposed New Nuclear Power station at Wylfa. They stated that if the Power station project does not go ahead then the connection will not be required. | This comment is noted. |
| | National Grid stated that a direct undersea link between the power generating point at Wylfa and the main consumption area at the North West of England was not feasible due to the current state of technology. They stated that a High Voltage Direct Current of the type connecting Scotland and England would not work. | This comment is noted. |
| | It is understood from the National Grid "Questions and Answers" document published in October 2016 that the old underground pipeline from Anglesey to England cannot be used. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | It is understood that National Grid propose a connection between Wylfa and Pentir using overhead pylons across Anglesey, a tunnel under the Menai Strait and overhead pylons from the end of the tunnel to the existing facility at Pentir. | This comment is noted. |
| Issues | Whilst the Pentir and Y Felinheli Community Councils support the opinions of and position taken by communities across Anglesey regarding this proposed project, the main features affecting the Pentir and Y Felinheli Communities will be the works to create the tunnel and the link from the tunnel to Pentir. The following comments concentrate on that portion of the proposal. | This comment is noted. |
| The Tunnel | Pentir and Y Felinheli Community Councils accept that a tunnel under the Menai Strait is preferable to a new overhead link. They have concerns over the impact of activities during the construction activities of the project. | This comment is noted. |
| | It is understood that the construction of the tunnel will involve digging vertical shafts at either end, and then digging the tunnel by boring from one end only. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |

| Table 254: Pentir and Y Felinheli Community Council | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | National Grid explained that the digging of the vertical shafts at either end of the tunnel will produce spoil. | This comment is noted. |
| | It is understood that the spoil from the digging of the vertical shaft at the Gwynedd side would be extracted on the Gwynedd side, whatever side the tunnelling started from. It was stated that it may be an option to dispose of that spoil at the nearby Nant Y Garth landfill site, meaning that transport of this material would remain within the construction site and would not have an adverse effect on local roads. | Matters relating to Waste and Materials Management are presented in THE OWMP (Document 7.11) and the OMMP (Document 7.12). |
| | National Grid explained that the digging of the tunnel will also produce spoil. They explained that their preferred option is to start tunnelling activities from the Anglesey side and that in that case the spoil would be extracted at the Anglesey side for transport off site. A shorter vertical lift height in the shaft, easier road links and potential use of the railway make the Anglesey option favourable. | This comment is noted |
| Concern over transport of spoil from tunnelling | The community councils stated that they would have concerns about the impact of transporting spoil from any digging or tunnelling activities on the road network around Pentir. The Nant y Garth Hill would be a specific pinch point. It was stated that any road works around the Bangor area have been observed to cause congestion in the area - possibly miles away from the actual works. The road network should be considered as a network and not as an isolated point. | The preferred route for construction traffic in the Pentir area is via A55 Junction 11 and the A4244. This is documented in the OCTMP (Document 7.5) |
| Concern over general construction traffic | Concern was also expressed about the impact of general construction traffic in the Pentir area. National Grid stated that they would liaise with relevant authorities and put management procedures in place to minimise the impact of traffic movements. | Information is provided in Chapter 13 Traffic and Transport (Document 5.13) and its appendices. |
| | National Grid stated that the end of the tunnel would be 1.2km from the Pentir facility. They stated that extending the tunnel all the way to the Pentir facility would involve excessive tunnelling costs and result in an excessive height of shaft on the Gwynedd side. This vertical height would have negative impacts on the cabling from the tunnel to the top of the shaft. | This comment is noted |
| Connection from the top of the shaft to Pentir Overhead Lines | National Grid stated that their current proposal was for overhead lines hung from pylons. They stated that the pylons would be shorter and wider than the current pylons used by them in the area. | The assessment of effects on general public visual amenity, from publically accessible places are described in Chapter 8, Visual Assessment (Document 5.8). A residential visual amenity assessment has been undertaken for all properties that fall within 500 m of LOD/maximum parameters of the Proposed |

| Table 254: Pentir and Y Felinheli Community Council | | |
|---|---|--|
| Consultee and Section Reference | Comment | How the comment has been addressed |
| | The Community Councils stated that they objected to the use of overhead lines hung from pylons due to the negative visual impact this would have on the area. | <p>Development, the results of this assessment are found in Appendix 8.3, Residential Visual Amenity Assessment (Document 5.8.2.3).</p> <p>Enhancement measures have been considered separately to the EIA as these would be undertaken by voluntary agreement; such measures include consideration of wider landscape enhancement e.g. restoration of boundaries such as cloddiau that are not directly affected by the Proposed Development and planting of trees and woodland in the wider landscape. In addition, planting would be offered to residential receptors in the form of a Voluntary Residential Planting Scheme (VRPS). This would include the offer of planting to reduce/ minimise visual effects for eligible properties identified during the assessment.</p> <p>Enhancement measures along with the VRPS are presented in the Enhancement Strategy (Document 7.13).</p> |
| | The proposed lines and pylons would be highly visible in the locality and from the adjoining Snowdonia National Park. The National Park is a critical asset for current and future economic and cultural wellbeing of the area. Any development which could have a negative effect on people's enjoyment of views from the park could adversely affect economic outcomes. | The assessment of effects on both Snowdonia National Park and Anglesey AONB and their settings are reported in Chapter 7, Landscape Assessment (Document 5.7). This assessment makes reference to Appendix 8.2, Viewpoint Assessment (Document 5.8.2.2). |
| Undergrounding | <p>It was asked whether the use of Conventional Underground Cables from the top of the tunnel had been considered. National Grid stated that they had not developed a proposal for this option.</p> <p>National Grid stated that conventional undergrounding would involve more cost than overhead lines.</p> <p>They stated that 4 or 5 pylons covering the 1.2km distance would cost approximately £2 million.</p> <p>They stated that conventional undergrounding would cost approximately £18 million.</p> <p>The difference between the two options would be therefore £16 million.</p> <p>The total cost of the project was stated as £620 million.</p> | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |

| Table 254: Pentir and Y Felinheli Community Council | | |
|---|---|--|
| Consultee and Section Reference | Comment | How the comment has been addressed |
| | <p>The increased cost associated with Conventional Underground Cables would be $16/620 = 2.58\%$ of the total project cost. We believe this to be within the range of error allowed for in such a major project.</p> <p>The cost is therefore of relatively small significance compared to the negative impact of pylons which would be of major significance.</p> | |
| | <p>It must also be noted that the electrical distribution system will be in operation for a significant amount of time - say 50 years, until different technical options are discovered and developed. The cost spread over that timescale would be say £16 million / 50 years = £320k per year. This would have a minimal impact on operating costs and any costs passed on to customers.</p> | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | <p>National Grid stated that Conventional Underground Cables would involve a strip of land 70m wide in order to accommodate the burying of three sets of cables. National Grid pointed out that Conventional Underground Cables would lead to restrictions on the type of developments that would be permitted on that land in the future. The Community Councils pointed out that the land is generally used for grazing land and that such limitations on use should not have a significant impact.</p> | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | <p>The Community Councils asked if undergrounding in ducts had been considered. This option would involve a narrower strip of land. National Grid stated that undergrounding in ducts had not been considered.</p> <p>It is understood that undergrounding in ducts would involve provision of cooling systems.</p> <p>The Community Councils pointed out that undergrounding was being carried out in other parts of the UK e.g. the Lake District.</p> | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| Opportunity for Energy Recovery | <p>It is understood that the use of underground ducts would require heat dissipation through the use of cooling systems. Dissipation of heat to the atmosphere would result in a loss of that energy.</p> <p>This potential negative effect could provide an opportunity for some kind of energy recovery system. Low level energy could be channelled very simply for horticultural use. One could envisage an ongoing, sustainable use of this energy for growing crops in greenhouses.</p> | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |

| Table 254: Pentir and Y Felinheli Community Council | | |
|---|--|--|
| Consultee and Section Reference | Comment | How the comment has been addressed |
| | The same could be considered for energy dissipated from the tunnel. National Grid are urged to consider this option which would improve the impact and green credentials of this project. | |
| Conclusion on the connection from the top of the tunnel to Pentir | The Community Councils are strongly of the opinion that overhead lines are not acceptable and urge the National Grid to develop and implement an undergrounding scheme. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| Screening of the Pentir facility | <p>It is understood that any new substation and connection developments at the Pentir facility will be screened from view using new planting of trees.</p> <p>The Community Councils noted that visual screening of the current site is inadequate, in part due to loss of trees in adverse weather during recent years. They requested that National Grid improve the visual screening by planting more trees.</p> | Figures 7.12-7.16 Landscape Mitigation Proposals (Document 5.7.1.12-5.7.1.16) present more detailed information on specification of proposed mitigation planting. |
| Energy from Ireland | National Grid stated that the proposed cable system to carry energy from Ireland would be entirely separate from the connection from Wylfa to Pentir. A connection would be required into Pentir but this would use a cable coming ashore at a point on the north west coast of Gwynedd and coming overland in a buried cable, probably following the road network. The connection would deal with much smaller power and be much smaller in size. | This comment is noted |
| CONCLUSION | 1. The Pentir station is already an eyesore and can be seen from the hills within the National Snowdonia Park. While realising that landscaping the station might help improve this situation, the erecting of Pylons will certainly scar the landscape and have a negative impact on the environment for those visiting the Snowdonia National Park. We therefore request that the cables between the Tunnel Head House and the Pentir station be set underground." | Underground cables between the THH/CSEC and Pentir Substation are not proposed. Landscape and visual effects of the Proposed Development are presented in ES Chapter 7 Landscape Assessment (Document 5.7) and ES Chapter 8 Visual Assessment (Document 5.8) |
| | 2. The B4547 is a main commuter route from Llanberis and Llanddeiniolen to Bangor and is particularly busy during work "rush hour" and during the tourist season. It is a particular black spot for road accidents and has led to many injuries and some fatalities in recent years. The Community Councils have particular concerns regarding congestion along this route and would be keen to have clear indication that the National Grid take every precaution to reduce any risk of traffic congestion and danger to the local community during this development. | <p>The preferred route for construction traffic in the Pentir area is via A55 Junction 11 and the A4244. This is documented in the OCTMP (Document 7.5).</p> <p>The TA (Document 5.13.2.1) includes an assessment of Highway Safety for proposed construction traffic routes included in the Proposed Development.</p> |

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26 Public Health England

| Table 265: Public Health England | |
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| Comment | How the comment has been addressed |
| Thank you for your consultation regarding the above development. Public Health England (PHE) welcomes the opportunity to comment on your proposals and preliminary environmental information report at this stage of the project. | This comment is noted. |
| We have replied to the earlier request for scoping opinion consultation on 17th June 2016 and recommend that this response is read in conjunction with this earlier correspondence. | This comment is noted. |
| PHE has considered the submitted documentation and can confirm that we are satisfied with the approach being taken (including further assessments) in preparing the Environmental Impact Assessment (EIA) and resulting Environmental Statement (ES). In relation to Electric and Magnetic Fields (EMF), it is noted that the proposal at the Scoping Consultation stage was to exclude EMF from the scope of the EIA ES, but to provide a separate document containing information on EMF produced by the proposed development. We | Issues related to electric and magnetic fields are presented in the EMF Report (Document 5.25). |

| Table 265: Public Health England | |
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| Comment | How the comment has been addressed |
| expect to see this document alongside the ES as part of the DCO application. | |
| <p>Relevant areas outlined in the Government's Good Practice Guide for EIA include:</p> <p>impacts associated with re-use of soils and waste soils, for example, re-use of site-sourced materials on-site or offsite, disposal of site-sourced materials offsite, importation of materials to the site, etc</p> | <p>An assessment of soil loss has been undertaken as part of the EIA and is reported in ES Chapter 18 Agriculture (Document 5.18) and ES Chapter 11 Geology, Hydrogeology and Ground Conditions (Document 5.11). Matters relating to Waste and Materials Management are presented in THE OWMP (Document 7.11) and the OMMP (Document 7.12).</p> |
| Should you have any questions or concerns please do not hesitate to contact us. | This comment is noted. |

27 Public Health Wales

| Table 276: Public Health Wales | | |
|---------------------------------|---|--|
| Consultee and Section Reference | Comment | How the comment has been addressed |
| | These comments take a Public Health Wales organisational perspective and include contributions from North Wales Local Public Health Team, and Environmental Health Protection Team. | This comment is noted. |
| Air Pollution | | |
| | <p>The assessment of air pollution impacts considers two potential sources. Firstly construction work at the sites across the area impacted, and secondly from vehicle movements.</p> <p>Public Health Wales support the need to carry out assessments of local air pollution at sensitive receptors alongside key construction routes. Public Health Wales also supports the analysis of how cumulative impacts with other developments will impact traffic on shared routes.</p> <p>However, the routes assessed are limited to those local routes between the A55 and construction areas. The impact on the strategic network is not considered either individually or cumulatively.</p> | This comment is noted. |
| | The assessment of traffic and transport recognises that over the lifetime of construction 65,367 HGV movements are estimated (approximately 112 per day on average). It is estimated that 70% of these will route via the A55 from outside the study area, with a further 30% routing via the A55 to a construction compound before proceeding to their destination. In both these scenarios the vehicle movements are likely to be across the Britannia Bridge. In addition to these HGVs movement a further 41,703 LGV movements (average 71 per day) are expected, some of which will also have to cross onto Anglesey via the A55. | The ES Chapter 13 Traffic and Transport (Document 5.13) and the Transport Assessment (Document 5.13.2) provided revised forecasts on the construction traffic associated with the Proposed Development |
| | The A55 across North Wales has established problems with traffic at peak periods, especially in the areas around Queensferry, Penmaenmawr, Llanfairfechan and the Britannia Bridge. Additional burden at these points may impact on health through air pollution. This is especially pertinent when considering the cumulative effects of Wylfa Newydd, and the A55 Junction 15 and 16 improvement projects. | The ES Chapter 13 Traffic and Transport (Document 5.13) and the Transport Assessment (Document 5.13.2) provided revised forecasts on the construction traffic associated with the Proposed Development . The effects on the A55 are considered in these documents, along with the cumulative impacts of the Proposed Development and Wylfa Newydd Power Station. |
| | Public Health Wales would like to see greater consideration given to the impact on health from additional queuing traffic at the Britannia Bridge and other congestions hotspots on the strategic network. Modelling of air | Chapter 14 Air Quality and Emissions (Document 5.14) provides the findings of the impacts on air quality. |

| Table 276: Public Health Wales | | |
|---------------------------------|---|--|
| Consultee and Section Reference | Comment | How the comment has been addressed |
| | pollution should be extended to sensitive receptors in the vicinity of these hotspots. | |
| Workforce | | |
| | It is not clear where the impacts of the external workforce needed to construct the project on the accommodation and communities of the island are considered. Discussions with National Grid have indicated that this will be relatively small (~200 workers). However, the cumulative impacts when considered alongside Wylfa Newydd are substantial. | An assessment of socio-economic effects is provided in Chapter 17 Socio-Economics (Document 5.17), and includes consideration of effects on tourism accommodation and the private rented sector (PRS). An assessment of cumulative effects on accommodation is also provided in Chapter 17. |
| | <p>Public Health Wales would like to see greater consideration given to the cumulative impact of the workforce on communities on the island especially focusing on:</p> <ul style="list-style-type: none"> Consideration of cumulative impacts on sex workers, looked after children and those vulnerable to sexual exploitation and appropriate mitigation. Consideration of risk and appropriate mitigation of modern slavery especially in workforce required to support the workers in accommodation. | <p>This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1)</p> <p>The CEMP (Document 7.4) confirms that the contractor will be a member of the Considerate Constructors Scheme and will adhere to a Code of Conduct. The Code of Conduct will include sections on respecting the environment, respecting communities and respecting Welsh Language and Welsh Culture</p> |
| | Public Health Wales would also like to see consideration given to shared management tools (e.g. Wylfa Newydd Accommodation Portal) to reduce impacts in local communities. | This comment is noted |
| Conclusions | | |
| | Public Health Wales have reviewed the consultation documents and are in broad agreement with many of the impacts considered. However, a number of areas where more information is required have been identified, and prior to the final submission of the DCO Public Health Wales would like to see these issues addressed. | This comment is noted. |

28 Snowdonia Society

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| Table 2728: Snowdonia Society | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| Section: Q1. Wylfa substation and the overhead line on Anglesey | <p>Question: Have you any comments on the proposals or are there any changes you think we can make to further reduce the effects? Please tell us and, importantly, please tell us why.</p> <p>I write on behalf of Cymdeithas Eryri the Snowdonia Society, the charity which since 1967 has worked to protect, enhance, and celebrate Snowdonia and its National Park.</p> <p>Anglesey's coastline and Snowdonia have important attributes in common, despite their dramatically different character:</p> <ul style="list-style-type: none"> • both are designated for their natural beauty - Snowdonia as a National Park, Anglesey as an Area of Outstanding Natural Beauty. • both depend to a very great extent on that natural beauty to sustain fragile rural economies. • both currently deliver at an exceptionally high level for the health and well-being of the people of Wales and beyond. • both are connected - literally - by the blight of overhead high-voltage cables and pylons which damage and detract from their outstanding landscape value. | This comment is noted. |
| | <p>Welsh Government policy is increasingly aligning AONBs and National Parks in terms of purposes and management, so far as government intentions can be gleaned from the unfolding of the Marsden Review and the Future Landscapes Wales programme.</p> <p>The Well-being of Future Generations (Wales) Act 2015 legislates to improve the social, economic, environmental and cultural well-being of Wales. As a consequence there is a clear requirement for decisions in the public sphere to be based on genuine integration of the economic, environmental, cultural and social quadruple bottom line.</p> <p>High-voltage overhead lines have for decades blighted the landscapes of Snowdonia and Anglesey. The nuclear facilities they serve have come and gone but the hideously ugly and intrusive pylons remain.</p> | This comment is noted. |
| | The description of Anglesey, the Menai Strait and the mainland gateway to Snowdonia as being blighted is not just the opinion of a conservation charity, nor the people of Anglesey and their elected representatives. That blight is clearly and unequivocally acknowledged as a significant problem by the existence of the £500million Visual Impact Provision project currently being rolled out by National | <p>This comment is noted. Visual Scheme</p> <p>The VIP Project is focussed on the undergrounding of sections of overhead line within National Parks and AONB. The Proposed Development includes a tunnel under the Menai Strait, avoiding direct effects to the AONB. There are</p> |

| Table 2728: Snowdonia Society | | |
|---------------------------------|---|---|
| Consultee and Section Reference | Comment | How the comment has been addressed |
| | <p>Grid. This project addresses the serious harm to nationally important landscapes caused over many decades by the presence of high-voltage overhead pylon and cable lines.</p> <p>Undergrounding existing overhead high-voltage lines is proving to be both technically challenging and extremely expensive. We have met the team in charge of the project and seen the scale of the challenge which National Grid faces to underground just four modest sections of line dotted amongst all the National Parks and AONBS in England and Wales.</p> <p>It is worthwhile and welcome work, and will make a big difference at a local level but it barely begins to scratch the surface of the problem. There are over 500km of such lines in National Parks and AONBs and the baseline cost is £20million per kilometre to underground such lines where ground conditions are favourable. That fund of £500million will have done well if it results in 20km of undergrounding, spread across 4 designated landscapes.</p> | <p>no direct effects to the National Park which at its closest point is over 6 km from the Order Limits.</p> <p>The landscape assessment has considered the effects on both Snowdonia National Park and Anglesey AONB and their settings. The assessment of effects on landscape designations are reported in Chapter 7, Landscape Assessment (Document 5.7). This assessment makes reference to Appendix 8.2, Viewpoint Assessment (Document 5.8.2.2).</p> |
| | <p>We therefore challenge National Grid to re-do the sums. The relative costs of pylons versus undergrounding can be calculated in more than one way. It is our belief that National Grid has made fundamental and grave errors in these critical calculations.</p> <p>We challenge National Grid to recalculate the costs of the preferred overhead route taking the following into account.</p> <p>1. The real costs over time which are likely to include future costs of undergrounding part or all of these proposed overhead lines. This is not speculation – the current VIP programme is clear evidence that this happens and the cost calculations should reflect that reality. The real cost of new overhead lines is the cost of building and maintaining those lines plus the cost of all future undergrounding which may take place. We all end up paying twice and suffering the visual impacts - this is not a good deal for anyone.</p> <p>2. Long-term costs – economic, social, cultural and environmental – of continued and increased damage to the designated landscapes of the area if the overhead route goes ahead</p> <p>3. Opportunity costs – what are the costs of the lost opportunities for Anglesey, the Menai Strait corridor and the northern gateway to Snowdonia to capitalise on a potentially pylon-free future?</p> | <p>This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1)</p> |

| Table 2728: Snowdonia Society | | |
|---------------------------------|---|------------------------------------|
| Consultee and Section Reference | Comment | How the comment has been addressed |
| | There is a saying – ‘Do a job once and do it right’. We urge National Grid to apply that as a principle now. Do the right thing by local people and the environment they live in. Do the right thing by future generations. Make the right decisions today, by properly accounting for the real costs over time of the overhead lines, including the full social, environmental and economic costs. | This comment is noted. |

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29 Welsh Ambulance Service NHS Trust

| Table 298: Welsh Ambulance Service NHS Trust | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | The Welsh Ambulance Service NHS Trust (WAST) welcomes the opportunity to comment on the National Grid proposal. | This comment is noted. |
| | <p>There are several areas of focus for WAST:-</p> <ul style="list-style-type: none"> • Mitigating the increased demand on emergency ambulance provision caused by temporary workers, the accessibility and suitability of the temporary worker accommodation for emergency response access and the provision of health information to workers, ensuring correct use of NHS pathways into the most appropriate care facility. • The impact of increased heavy goods vehicle and workers transport traffic associated with the project which could lead to delays in emergency ambulance response times, increased frequency and severity of road traffic collisions and general congestion in areas with limited alternative routes. • Having in place emergency procedures relating to access to sealing end compound sites for land based vehicles and air ambulances in the event this response is | This comment is noted. |

| Table 298: Welsh Ambulance Service NHS Trust | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | <p>deployed. Ensuring an agreed procedure for ambulance site access as to not delay an ambulance response.</p> <ul style="list-style-type: none"> Understanding National Grid's emergency preparedness and specialist care provision, including rescue capabilities when using specialised equipment in activities including, but not limited to tunnelling and erecting pylons. | |
| | <p>Upon reading the consultation documents, there is no specific mention of the number of temporary workers or how and where they will be accommodated. We will need to understand the number of temporary workers residing in North Wales in order to mitigate the increased demand on emergency and non-emergency ambulance service provision. WAST will need to work with the National Grid in regards to any temporary / permanent accommodation to ensure easy access for ambulances and air ambulances to the site/s. We will also expect National Grid to educate its workers on the wide range of health services provided by Betsi Cadwaladr University Health Board in the area ensuring that workers</p> | <p>An assessment of socio-economic effects, including details of worker numbers, is provided in Chapter 17 (Document 5.17), and includes consideration of effects on tourism accommodation and the private rented sector (PRS). Information on the anticipated spatial distribution of workers is also provided.</p> |

| Table 298: Welsh Ambulance Service NHS Trust | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | access the most appropriate provision i.e. GP out of hours, NHS Direct Wales and when necessary 999. | |
| | WAST notes there will be a detailed Construction Traffic Management Plan which will be developed in conjunction with the relevant agencies and this takes account of the need of ambulances to travel under blue lights during heavy traffic. WAST will welcome the consideration of any measures to reduce work traffic on the island and keep bridges clear, for example the removal of soil from tunnelling to take place at the Gwynedd site. | An OCTMP (Document 7.5) has been produced and developed in consultation with WAST. |
| | Based on previous experience of large construction sites, access arrangements and health & safety have been an issue. WAST will want to engage with National Grid to identify clear and suitable access for ambulances to each of the sealing end compounds. We would also like the consideration of Air Ambulance landing sites close to these sealing end compounds in the eventuality that this is the response deployed to any emergency. Closer to the time of building WAST would like clear, agreed procedures on access to ensure there is no delays to an emergency response. | This comment is noted |

| Table 298: Welsh Ambulance Service NHS Trust | | |
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| Consultee and Section Reference | Comment | How the comment has been addressed |
| | Following reading of the consultation documents, WAST considers the project will involve high risk equipment and activities including, but not limited to: tunnelling under the Menai Strait and erecting pylons. WAST would like a clearer understanding of National Grid policies for emergency preparedness and specialist care in the event of an emergency situation. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |
| | WAST needs to understand the legacy operations associated with care and maintenance of the pylons and tunnel and how National Grid intends to mitigate the associated risks, furthermore we need to understand the associated change in threat status such developments will bring to region and how this can be mitigated. | This comment is noted and where appropriate addressed in the Consultation Report (Document 6.1) |