

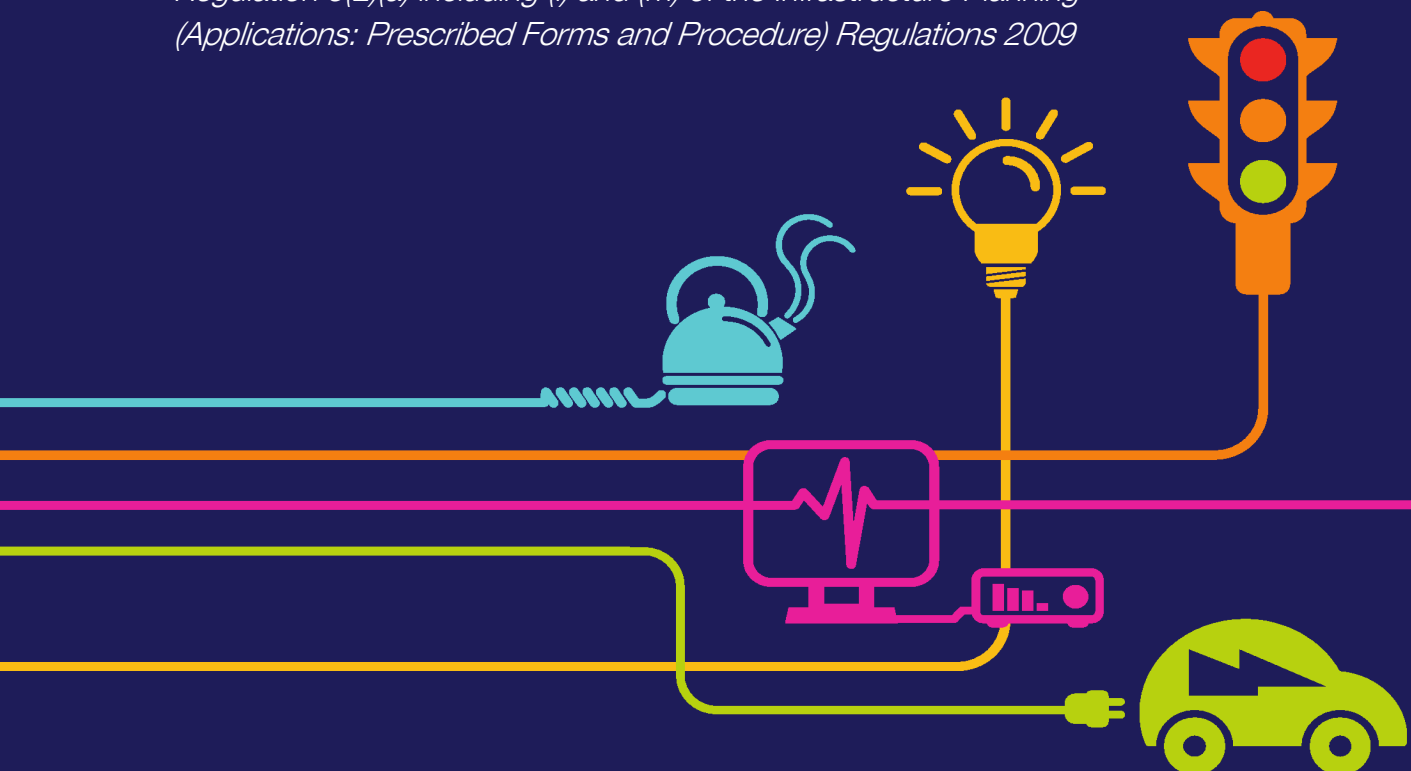
DOCUMENT 5.5.2.3

Schedule of Responses to Stakeholder Review of the Draft ES

Chapter 5 – Appendix 3

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

Volume 5

Document 5.5.2.3 Appendix 5.3 Schedule of Responses to Stakeholder Review of the Draft ES

National Grid
National Grid House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA

Final September 2018

Page intentionally blank

| Document Control | | | |
|---------------------|--|--------|----------------------|
| Document Properties | | | |
| Organisation | AECOM | | |
| Author | Nicole Walsh | | |
| Approved by | Nigel Pilkington | | |
| Title | Environmental Statement Appendix 5.3 Schedule of Responses to Stakeholder Review of the Draft ES | | |
| Document Reference | 5.5.2.3 | | |
| Version History | | | |
| Date | Version | Status | Description/Changes |
| September 2018 | Rev A | Final | Final for submission |
| | | | |
| | | | |
| | | | |

Page intentionally blank

Contents

| | | |
|----------|--|------------|
| 1 | Introduction | 1 |
| 2 | Isle of Anglesey Council | 2 |
| 3 | Gwynedd Council | 171 |
| 4 | Natural Resources Wales | 277 |
| 5 | Welsh Government | 309 |
| 6 | National Trust | 315 |
| 7 | North Wales Fire and Rescue Service | 321 |
| 8 | Planning Inspectorate | 325 |

Page intentionally blank

1 Introduction

- 1.1.1 This document presents responses received from technical stakeholders following the issue of a number of draft documents in late 2017 to early 2018. It also presents responses to points raised where appropriate.

2 Isle of Anglesey Council

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| Volume 5, Chapter 1: Introduction | | | |
| Overall Conclusion of Factual Assessment | The information set out in the chapter is considered to be sound, however there is a lack of information on the consenting strategy which means that IACC is unable to engage on the matter, or comment on its adequacy in more substantive detail. | | <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> <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> |
| | <p>IACC suggests that the following is shared in future batches to enable adequate engagement:</p> <ul style="list-style-type: none"> Chapter 2 of the ES: Proposed Development History and Alternatives Complete assessment of options presented in each technical chapter (with regards to two route options and two scenarios associated with tunnel construction) Document 7.3 Details of Other Consents and Licenses Document 7.13 Need Case | | Noted; wherever possible documents have been shared with IACC prior to submission. However this has not been possible in all cases. |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| Question 1: Does the information provide sufficient detail/clarity on National Grid's proposal/position? | The chapter does not provide clarification on the consenting strategy in terms of the TCPA or Marine Licences required for the construction works, as requested in response to Scoping and S42. A clear consenting strategy for all elements of the project, including Associated Development and Wider Works, has yet to be provided. | | <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> <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> |
| | Paragraph 3.1.2 states that the ES provides “sufficient information to inform stakeholders, including the local community, of the main environmental effects that could arise as a result of the Proposed Development”. Without sight of the ES technical chapters, IACC is unable to support this statement at this time. The documents shared at Batch 1 present a range of options which it is expected will undergo a complete assessment in the ES for IACC to engage on, including: | | All Options and Scenarios are assessed in the technical chapters (Documents 5.7 to 5.18) where necessary |
| | Table 1.1 refers to the information required under Schedule 4 Part 1 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 and includes reference to “an outline of the main alternatives studies by the | | Noted |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | applicant and an indication of the main reasons for the applicant's choice, taking into account the environmental effects" which is located in Chapter 2. IACC notes that National Grid have confirmed that Chapter 2 will not be shared as part of this stage of consultation on the ES. IACC would expect that this chapter is updated in line with comments previously raised at Section 42 and with the information requested by IACC through recent correspondence with National Grid (and the Strategic Optioneering Workshop on 09/01/2018), and would suggest the updated chapter is shared in advance of DCO submission. | | |
| Question 2: Is the detail submitted adequate (ie, in order to make an assessment)? | Section 2.1 of the chapter refers to Document 7.3 Details of Other Consents and Licenses however, National Grid has yet to share this document and the Council is therefore unable to comment on the adequacy of the proposed consenting regime, outside of the DCO process. It is suggested that this document is shared with IACC to enable engagement prior to DCO submission, however it does not appear to be in the list of documents to be shared in Batches 1 – 4. | | Noted |
| | The Chapter refers to Document 7.13 Need Case, which it is understood will not be presented as part of Batches 1 – 4. IACC suggested at S42 that the Needs Case document be updated to more clearly articulate the changes in contracted capacity throughout the project's development, including anticipated future requirements, and implications on the Need Case for the project. | | An updated Project Need Case (Document 7.1) has been provided as part of Volume 7 of the DCO application. The document describes how the contracted generation has altered over the course of the Project and explains how National Grid has responded to these changes. The need case for significant network reinforcement has remained consistent throughout the evolution of the Project with the main effect of the changing customer plans being on the exact capacity required of the reinforcements rather than the fundamental scope of the strategic options. |
| Question 3: Is there anything missing? What are the gaps? Do you have any views on the impact assessment by National Grid? | In advance of the Optioneering Workshop held on 9 January 2018, IACC posed a number of questions in respect of alternatives considered, including both full and partial undergrounding. IACC would like to understand what weight National Grid applied to the consideration of alternatives, particularly in light of the Richborough scheme. | | National Grid provided a draft response to IACC's questions via letter dated 3 rd April 2018, noting that work in updating the Needs Case and Strategic Options Report was still being carried out. |
| | <ul style="list-style-type: none"> Chapter 2 of the ES: Proposed Development History and Alternative | | Noted |
| | <ul style="list-style-type: none"> Complete assessment of options presented in each technical chapter (with regards to two route options and two scenarios associated with tunnel construction) | | Noted |

| Table 1: Isle of Anglesey County Council | | | |
|---|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <ul style="list-style-type: none"> Document 7.3 Details of Other Consents and Licenses | | Noted |
| | <ul style="list-style-type: none"> Document 7.13 Need Case | | See response above |
| Question 4: Are the mitigation proposals adequate and fit for purpose? | <ul style="list-style-type: none"> Not applicable | | N/A |
| Question 5: Are there any changes or inconsistencies in the project detail following on from s42 or any Thematic Working Group? | A clear consenting strategy, as requested in IACC's response to Scoping, was not provided at S42. Information has not been provided at TWG meetings to date and remains an outstanding matter. | | <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> <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> |
| Volume 5, Chapter 3: Description of the Proposed Development | | | |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| Overall Conclusion of Factual Assessment | The Chapter presents two options which National Grid propose to submit as part of the DCO application – Options A and B. Further information should be provided in the introductory chapters of the ES with regards to the reasoning and the proposed method for decision-making behind these options. | | Additional information about these options is provided in Chapter 3 Description of the Proposed Development (Document 5.3). |
| | As noted at S42 and in response to Questions 1 - 3 above, the construction of the sections of the route where transposition is proposed must be clearly defined and assessed within the ES technical chapters. | | There are three areas of transpositions, which are defined in Section 3.2 of ES Chapter 3 Description of the Proposed Development (Document 5.3). Figure 3.2 (Document 5.3.1.2) illustrates where the new and existing sections would be located. |
| | As noted at S42, all temporary land take should be assessed as part of the EIA and should be within the Order Limits of the DCO. Furthermore, the full set of Design Plans has yet to be provided – confirmation is sought as to whether these will be provided in future batches. | | ES Chapter 18 Agriculture (Document 5.18) details areas of permanent and temporary land take within the Order Limits of the DCP. The assessment concluded no significant effects are predicted on best and most versatile (BMV) agricultural land as a result of the Proposed Development. Design Plans show the parameters for Braint and Tŷ Fodol and Pentir Substation; they are presented as Document 4.13 . Works plans show the Order Limits, above and below ground LOD, site boundaries, pylon locations, centreline and construction compounds; they are presented as Document 4.4 . Construction Plans show everything which is on the works plans plus all of the working areas, bellmouths and access track locations. These are Figure 4.1 (Document 5.4.1.1) of Chapter 4 Construction, Operation, Maintenance and Decommissioning (Document 5.4). |
| Question 1: Does the information provide sufficient detail/clarity on National Grid's proposal/position? | The chapter provides helpful descriptions of the scheme to be carried out, which generally enable the reader to understand the proposals. However, there are substantive omissions / issues as noted by the following: | | This comment is noted. |
| | Additional option Section 3.2 introduces two options in relation to the application for the 400 kV OHL which IACC has not been consulted on previously. The options are presented on Figure 3.2 and information is provided in Paragraphs 3.4.2 and 3.9.3-4, as related to Section D of the proposed route. There is a lack of information with regards to the reasoning for the retention of these options and | | As detailed in Section 3.2.1 of ES Chapter 3 Description of the Proposed Development (Document 5.3), Option A would oversail a residential property at Talwrn (R4/01483) and remove proposed pylon 4AP065 and Option B would avoid oversailing the same property. Both options have been assessed in the ES technical chapters (Document 5.7-5.18). Option A is the preferred outcome. |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | the proposed approach to how they are intended to be considered as part of the ES and through examination. Reference should be provided as to where and how this has been addressed. Reference should also be made as to how NG intend to seek consent for the options, whether one will be chosen prior to DCO submission or whether NG wish to retain the options for as long as practicable through the examination. It is suggested that this information be shared with IACC to ensure meaningful consultation. It is expected that both options will be fully assessed in the ES technical chapters (Batches 2 – 4). | | |
| | Transposition - construction As noted at S42 consultation, where the removal of the existing line and construction of new parallel lines to the south of Rhosybol, and between Clorach-fawr and Maenaddwyn, there will be a more intense and prolonged period of construction activity and associated impacts on local residents – this must be clearly defined and assessed within the ES technical chapters alongside a commensurate and tailored mitigation programme. Diagram 3.1 of section 3.3 of the chapter is a useful addition which visually displays the transposition process. | | Impacts on the amenity of local communities are considered in Chapter 17 Socio-Economics (Document 5.17) and its associated appendices, and intra project effects on individual properties are considered in Chapter 19 Intra-Project Effects Assessment (Document 5.19). |
| Question 2: Is the detail submitted adequate (ie, in order to make an assessment)? | Additional option Other than the reasoning and methodology for decision-making, the detail provided with regards to the proposed development and Options A and B is considered to be adequate. It is assumed that an assessment of the two options will be provided in the Environmental Statement technical chapters. | | Technical chapters within the Environmental Statement (Document 5.7-5.18) assess the potential effects of the Proposed Development under Option A and Option B. |
| | Transposition - construction The detail provided with regards to transposition is considered adequate for this chapter, however the construction process must be clearly defined and assessed in the ES technical chapters. | | The construction process of the areas where transpositions would occur is provided in Section 2 of ES Chapter 4 Construction, Operation, Maintenance and Decommissioning of the Proposed Development (Document 5.4). Where transpositions occur it is likely that modifications to the existing 4ZA route infrastructure would be required such as pylon modifications / strengthening, foundation modifications / strengthening or new pylons and conductor bundles. This in turn develops a construction scenario whereby there would be: dismantling works; temporary diversion works; works to the existing 4ZA route; as well as the proposed new build works, all occurring in the same location. Potential effects on local receptors have been assessed in the ES technical chapters. |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>Operational noise</p> <p>The detail provided in the chapter and the Design Plans is insufficient to understand the full picture of the proposed works and hence make an assessment from the point of view of operational noise. This may be addressed by considering the Design Plans in conjunction with drawings which will be received in future batches.</p> | | Noted |
| Question 3: Is there anything missing? What are the gaps? Do you have any views on the impact assessment by National Grid? | <p>Additional options</p> <p>Information has not been provided to confirm, however it is assumed that the two options have been presented to minimise impacts on the residents at the property to the west of Talwrn.</p> | | This assumption is correct. |
| | <p>Transposition - construction</p> <p>It is expected that further information will be provided with regards to the construction process in the ES technical chapters.</p> | | The construction process of the areas where transpositions would occur is provided in Section 2 of ES Chapter 4 Construction, Operation, Maintenance and Decommissioning of the Proposed Development (Document 5.4). |
| | <p>Temporary working areas / land take areas</p> <p>It is not clear from the chapter whether all temporary land take areas will be included within the Order Limits and assessed as part of the EIA.</p> <p>Temporary construction compounds and working areas are described in outline (4.7, 4.8) but as the generic layout plans are not available, there is currently insufficient information for an assessment to be undertaken.</p> | | All proposed temporary and permanent land take is within the Order Limits. Land take predominantly relates to agricultural land and has been assessed in ES Chapter 18 Agriculture (Document 5.18). Following construction, temporary land take would be reinstated. The assessment concludes there would be no significant residual effects on BMV land take as a result of the Proposed Development. |
| | <p>Design Plans</p> <p>Indicative landscaping areas of planting to screen the THHs and SECs has been provided. However, as noted at S42 consultation, it would be helpful to understand the detailed proposals for screening in reference to potential impacts and receptors affected, including implementation plans for the timing of planting and ongoing maintenance.</p> | | The approach to off-site measures such as landscape enhancement including proposals for screening are presented in the Enhancement Strategy (Document 7.18). |
| | <p>Construction and Operational Noise</p> <p>Where the chapter refers to options for construction methods (e.g. foundations in Section 3.12) there is uncertainty around how the construction noise and</p> | | Calculations have been carried out for works that are likely to produce high levels of vibration, as detailed in Section 4 of ES Chapter 15 Construction Noise and Vibration (Document 5.15). |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>vibration calculations would be performed. It is expected that this information would be provided when the technical chapter is received in Batch 3.</p> <p>Information on Tunnel Head Houses (THHs) and Cable Sealing End Compounds (CSECs) does not include sufficient information on landscaping to understand whether noise mitigation measures are included (4.4). It is expected that this information would be provided in the technical chapters in Batches 2 and 3.</p> | | <p>Underwater noise modelling has been carried out, as detailed in Appendix 9.18, Underwater Construction Noise Modelling and Assessment Report (Document 5.9.2.18) relating to tunnel construction beneath the Menai Strait.</p> <p>A Noise and Vibration Management Plan (NVMP) (Document 7.11) has been produced which sets out the noise and vibration control measures that will be employed by the contractor to reduce adverse noise and vibration effects.</p> <p>The CEMP (Document 7.4) provides control and management measures (CMM) which will be adhered to during the construction of the Proposed Development to reduce adverse noise and vibration effects. This includes temporary hoardings or noise barriers around worksites or noisy activities will be provided where necessary. Noise mitigation around the THHs and CSECs would be applied if deemed necessary.</p> <p>Details of operational noise from THHs and CSECs is provided in Section 9 of ES Chapter 16 Operational Noise (Document 5.16).</p> |
| | <p>Foundations</p> <p>Section 3.12 states that “the selection of foundation type would depend upon the ground conditions encountered”. IACC considers that risks to archaeology may also be a factor in determining the foundation type, and should be taken into consideration.</p> | | <p>Archaeology may influence foundation type but if significant archaeological potential is identified it may also lead to use being made of the flexibility to move pylon locations within the Order Limits.</p> |
| Question 4: Are the mitigation proposals adequate and fir for purpose? | <p>Question 4: Are the mitigation proposals adequate and fit for purpose?</p> <p>The mitigation proposals are not considered adequate in respect of Construction and Operational Noise</p> <p>At this stage, it would be anticipated that some description of ‘incorporated’ mitigation resulting from selection of sites would have been provided, however it is expected that this will be provided in the technical chapters due to be shared in Batches 2 – 4.</p> | | <p>Information on mitigation measures to reduce construction noise and vibration effects is provided in Section 9 of ES Chapter 15 Construction Noise (Document 5.15).</p> <p>Information on operation noise from the OHL, CSECs, THHs and Substation is provided in Section 9 of ES Chapter 16 Operational Noise (Document 5.16).</p> |
| | Additional option | | Noted |

| Table 1: Isle of Anglesey County Council | | | |
|---|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| Volume 5, Chapter 3: Description of the Proposed Development | As detailed above in relation to the additional option presented for the proposed scheme. This has not been discussed in TWG meetings to date, however the Council were informed that discussions with landowners was taking place with regards to this section of the proposed route. | | |
| | <p>Construction and Operational Noise</p> <p>Less detail has been provided in the chapter than has been discussed at TWG meetings with respect to detail of noise generating potential of conductors and insulators. Further information is anticipated within the technical chapter due to be received at Batch 3.</p> | | Noise generated from conductors and insulators is discussed in ES Chapter 16 Operational Noise (Document 5.16). Mitigation measures to reduce associated effects are provided in Section 9 of ES Chapter 16 and the CEMP (Document 7.4). For example, damage to, or contamination of, OHL conductors during handling and stringing can lead to a potential increase in noise once the OHL is energised. To reduce the likelihood of damage or contamination of the conductors, National Grid will require the appointed construction contractor to follow a rigorous quality assurance process during procurement, manufacturing and transportation of the conductors. Any appointed construction contractor will be required to follow National Grid suite of technical specifications and codes of practice to ensure that care would be taken during installation to ensure that conductors are kept clean and free of surface contaminants during stringing. |
| Volume 5, Chapter 4, Construction, Operation, Maintenance and Decommissioning of the Proposed Development | | | |
| Overall comment on factual assessment | <p>General comments:</p> <p>Whilst updates to the Chapter are welcomed, there is a lack of clarity associated with the chapter which IACC must have the opportunity to engage on over the coming months. The Chapter would benefit from the following additions:</p> <ul style="list-style-type: none"> Reference to methodology for determining appropriate spoil management Reference to methodology for reinstatement proposals Reference to landscape and topsoil management | | <p>The management of spoil is discussed in the Outline Waste Management Plan (OWMP) (Document 7.5). The OWMP provides a method statement of the re-instatement of spoil.</p> <p>Topsoil management, including reinstatement, is referenced in the Outline Soil Management Plan (Document 7.10)</p> <p>Restoration proposals are reported in Chapter 4 Construction, Operation, Maintenance and Decommissioning of the Proposed Development (Document 5.4). The Outline Soil Management Plan (Document 7.4.2.2), which forms part of the Construction Environmental Management Plan (CEMP) (Document 7.4), sets out</p> |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <ul style="list-style-type: none"> Information regarding decommissioning of temporary works and temporary construction compounds | | <p>the general methods for handling, excavation, storage and reinstatement of soils and peat.</p> <p>The CEMP also contains the following reinstatement commitment: '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'. 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.</p> |
| | <p>Construction Plans</p> <p>The Construction Plans are considered to lack sufficient detail to provide further commentary at this time. In order to ensure meaningful engagement, it is suggested that further detail and clarifications are provided as set out in response to Question 2. It is expected that some clarifications will be provided with the receipt of the Batch 2 – 4 technical chapters, however it would be beneficial for further information to be provided in Chapter 4 where the plans are referenced.</p> | | <p>Construction Plans are referenced in Section 2.5 of ES Chapter 4 Construction, Operation, Maintenance and Decommissioning of the Proposed Development (Document 5.4).</p> |
| | <p>Temporary Access Principles Note</p> <p>Overall, it is considered that the draft Temporary Access Principles Note provides sufficient detail on National Grid's proposals. It is however suggested that the following additional work should be undertaken and shared with IACC to enable meaningful and adequate engagement:</p> <ul style="list-style-type: none"> Speed surveys to determine visibility splays at new access points Quantified assessment of the access points should be provided as part of the Transport Assessment Mitigation measures | | <p>Section 3.4 of the Technical Access Principle Note (Appendix 4.1) provides a description of the Proposed Methodology.</p> <p>Speed surveys to determine visibility splay requirements at each of the temporary access points were commissioned in August, October and December. The location of the traffic surveys are contained in the Transport Assessment (Document 5.13.2.1).</p> <p>Section 4.2 provides additional mitigation measures within the Temporary Access Principle Note, alongside the DCO Plans and Schedules.</p> |
| | <p>IACC expects that the following will be provided in Batches 2 – 4 of the draft documents:</p> | | <p>A Construction Traffic Management Plan has been provided in draft and was discussed at a meeting with IACC in May 2018.</p> |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <ul style="list-style-type: none"> Construction Traffic Management Plan Updated Road Safety Audit following receipt of additional information not previously included Confirmation of a dedicated Transport Management Supervisor Updated construction drawings which show that the first 5 metres from the nearside edge of the County Highway are to be completed with a bitumen surface The updates to the Temporary Access Principles Note following the Council's earlier comments is welcomed. | | The Road Safety Assessment and Audit have been removed from the submission documents due to the need for them to be updated with the requested information, and these documents will be updated and shared with IACC separate to the submission process. |
| Question 1: Does the information provide sufficient detail/clarity on National Grid's proposal/position? | The chapter provides helpful descriptions of the scheme to be carried out, and for many aspects of the works the timescales over which they will be carried out. These enable the reader to understand the proposals and will assist interpretation of the assessment when received. | | This comment is noted. |
| | <p>The updated high level construction programme with geographical phasing of works and information on methodology for managing third party assets is welcomed, however information is still lacking with regards to the following areas raised at S42:</p> <ul style="list-style-type: none"> Management of spoil from tunnel construction (limits ability to provide substantive commentary in respect of technical disciplines particularly transport, noise and air quality all of which are highly relevant to the Council and its statutory duties) Commitment to provide a method statement of re-instatement proposals Decommissioning of temporary works and temporary construction compounds. | | <p>The potential need to remove all tunnel spoil from site is the worst case for the purposes of assessment, and all technical chapters assess this scenario.</p> <p>The management of spoil is discussed in the Outline Waste Management Plan (OWMP) (Document 7.5). The OWMP provides a method statement of the re-instatement of spoil.</p> |
| | <p>The chapter is also missing detailed information on:</p> <ul style="list-style-type: none"> Topsoil management Restoration of temporary bridges and culverts | | <p>Topsoil management, including reinstatement, is referenced in the Outline Soil Management Plan (Document 7.10).</p> <p>Restoration proposals are reported in Chapter 4 Construction, Operation, Maintenance and Decommissioning of the Proposed Development (Document 5.4). The Outline Soil Management Plan</p> |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <ul style="list-style-type: none"> Reinstatement of landscape elements Landscape management Timescales for temporary pylons and reinstatement of THH/CDES construction sites | | <p>(Document 7.4.2.2), 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.</p> <p>Landscape management would be achieved through the implementation of control and management measures which relate to mitigating effects on landscape receptors, as outlined in the CEMP (Document 7.4) and section 9.2 of ES Chapter 7, Landscape Assessment (Document 5.7).</p> <p>The CEMP also contains the following reinstatement commitment: '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'. 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.</p> <p>Almost all vegetation losses are short-term and reversible as they would be replaced/replanted in situ following construction. Vegetation would be reinstated as shown on CEMP Figure 1 Reinstatement Plans (Document 7.4.1.1); further information regarding certain landscape elements is included in the CEMP (Document 7.4).</p> <p>Landscaping Requirements are also included in the Draft DCO. Requirement 13 covers reinstatement, and Requirements 9-11 cover mitigation planting, implementation management and retention ES Chapter 17, Socio-Economics (Document 5.17) details the construction programme for the Proposed Development.</p> |
| | <p>Construction Plans</p> <p>The Construction Plans are considered to lack sufficient detail to support more meaningful commentary at this time.</p> <p>The local authority boundary line and the existing overhead line (not affected lines) are similar colours which could be confusing for readers. Furthermore, the</p> | | <p>Noted, however these changes could not be accommodated, due to the need for consistency with other plans.</p> |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | LoD can be difficult to interpret if considered without immediate reference to the Third Party Plans. | | |
| | <p>Temporary Access Principles Note</p> <p>Overall, it is considered that the draft Temporary Access Principles Note provides sufficient detail on National Grid's proposals. It is however suggested that the following additional work should be undertaken and shared with IACC to enable meaningful and adequate engagement:</p> <ul style="list-style-type: none"> • Speed surveys to determine visibility splays at new access points • Quantified assessment of the access points should be provided as part of the Transport Assessment • Mitigation measures • IACC expects that the following will be provided in Batches 2 – 4 of the draft documents: • Construction Traffic Management Plan • Updated Road Safety Audit following receipt of additional information not previously included • Confirmation of a dedicated Transport Management Supervisor <p>Updated construction drawings which show that the first 5 metres from the nearside edge of the County Highway are to be completed with a bitumen surface</p> <p>The updates to the Temporary Access Principles Note following IACC's earlier comments is welcomed.</p> | | <p>Speed surveys to determine visibility splay requirements at each of the temporary access points were commissioned in August, October and December. The location of the traffic surveys are contained in the Transport Assessment (Document 5.13.2.1).</p> <p>Section 4.2 provides additional mitigation measures within the Temporary Access Principle Note, alongside the DCO Plans and Schedules, and further detail is provided in the OCTMP (Document 7.5), ES Chapter and the TA (Document 5.13.2.1).</p> <p>An OCTMP (Document 7.5) has been provided in draft and was discussed at a meeting with IACC in May 2018.</p> <p>The Road Safety Assessment and Audit have been removed from the submission documents due to the need for them to be updated with the requested information, and these documents will be updated and shared with IACC separate to the submission process.</p> <p>Discussions with IACC on the need for a Transport Management Supervisor are ongoing and the OCTMP (Document 7.5) includes for a Traffic Control and Safety Officer and a Transport Review Group.</p> <p>Construction drawings are not included within the Temporary Access Principles note, however the requirements from IACC are noted.</p> |
| Question 2: Is the detail submitted adequate (ie, in order to make an assessment)? | Overall commentary on Question 2, the detail submitted is not adequate. | | This comment is noted. |
| | <p>Spoil</p> <p>As noted in response to question 1 above, the treatment of spoil including proposal for re-use or disposal, associated transport movements and impacts on local communities has not been provided. NG have provided two options for</p> | | The management of spoil is provided in the Outline Waste Management Plan (Document 7.5). Spoil from construction activities would be reused and reinstated where possible. Should the tunnel and OHL construction programme allow a proportion of the arisings to be considered for re-use in access track construction, the materials |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | tunnel construction which would involve spoil removal via Ty Fodol (NG preferred option) and Braint respectively. No reference has been provided however as to how the spoil will be managed and whether this will be provided in the CEMP. It is expected that management plans will be provided for each option and IACC will have the opportunity to meaningfully engage on the matter in advance of DCO submission, as it is difficult to understand and assess the potential scale of transportation and associated environmental impacts without this information. | | <p>would be assessed for their suitability. However all technical chapters assess a worst case scenario of all tunnel arisings being removed by HGV.</p> <p>Should a TBM be used to bore the tunnel, prior to completion of tunnelling and breakout of the TBM into the reception shaft, the bentonite slurry would be recovered from the pipework for re-use. A small quantity of bentonite would remain in the TBM during breakout and become mixed with the tunnel spoil. There would only be a few cubic metres of spoil and bentonite produced and this would be removed from the shaft and disposed of as either inert or non-hazardous waste.</p> |
| | <p>Reinstatement</p> <p>As previously stated at S42 consultation, IACC should be consulted on a method statement for re-instatement proposals, including any environmental mitigation and control measures proposed. This chapter would benefit from a section providing specific proposals for post-construction restoration. This has not been provided to date.</p> | | <p>Section 2.2.57 of ES Chapter 4 Construction, Operation, Maintenance and Decommissioning of the Proposed Development (Document 5.4) provides information on the removal of construction equipment and the reinstatement of Ground and Restoration of Soils. The Outline Soil Management Plan (Document 7.4.2.2), 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.</p> <p>The CEMP also contains the following reinstatement commitment: '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'. 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.</p> |
| | <p>It is not considered adequate to simply commit to reinstate to former condition. More detailed information on the reinstatement of landscape elements is required. Even if this is a set of principles. Details are required the locations and quantities, species and types of:</p> <ul style="list-style-type: none"> • re-seeding, | | <p>All information available is shown on CEMP Figure 1 Reinstatement Plans (Document 7.4.1.1); further information regarding certain landscape elements is included in the CEMP (Document 7.4).</p> |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <ul style="list-style-type: none"> • scrub planting • hedgerows planting • tree and woodland planting, • boundary creation (walls fences, gates etc.); • watercourses, • footpaths | | |
| | It is not clear whether post construction reinstatement of affected landscape elements such as river crossings, hedgerows, trees, woodlands, boundaries and agricultural land is to be relied upon as mitigation in the EIA and has thus been considered in respect of the overall scale of impact predicted. All mitigation measures relied on in the EIA need to be secured and deliverable as part of the DCO within agreed DCO red line boundaries. | | Post construction reinstatement of affected landscape elements such as river crossings, hedgerows, trees, woodlands, boundaries and agricultural land is relied upon as mitigation in the EIA and has been considered in respect of the overall scale of impact predicted in each of the related technical chapters. The Schedule of Mitigation (Document 5.28) provides a summary of committed mitigation, and also highlights how the measure is secured. |
| | Decommissioning The chapter still lacks information regarding decommissioning of temporary works and temporary construction compounds. | | The CEMP (Document 7.4) includes measures R1 to R6 which explain the approach to reinstatement. |
| | Topsoil management The chapter provides limited detail with regards to topsoil stripping, handling and storage during construction. It's considered imperative that a commitment is made to undertake this in line with the relevant British Standards and best practice. Good quality site-won topsoil will be a critical part of the post construction reinstatement process. Therefore, further information should be provided regarding weed control, spreading and cultivation methods. | | Potential effects of the Proposed Development on topsoil are outlined in ES Chapter 18 Agriculture. Mitigation measures, including topsoil management, are outlined in Section 9 of ES Chapter 18, Agriculture (Document 5.18), Outline Waste Management Plan (Document 7.5), Outline Soil Management Plan (Document 7.10) and the CEMP (Document 7.4). |
| | Restoration of temporary bridges and culverts No restoration commitments are made in respect of temporary bridges and culverts. It is imperative that NG sets out how these elements and any associated foundations will be removed from site following construction, how | | The CEMP (Document 7.4) states that following construction, temporary watercourse crossings will be removed and bed and bank material will be reinstated in the same general profile as the pre-installation state. Bed and bank profiles will be recreated with |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | they would be disposed of, and how the areas will be reinstated to their former condition. | | appropriate measures to ensure stability that do not involve hard engineering (unless such stability measures were in place before the watercourse crossing works are carried out). |
| | <p>Landscape management</p> <p>The Holford rules are intended to inform routeing decisions based on (amongst other things) features of the existing landscape. They are intended to aid the design process by setting out which embedded or 'primary' design mitigation measures should be considered when routeing and designing a line to avoid effects at source. It is a logical extension therefore to use them also to guide the design of secondary or landscape mitigation in order to reduce unavoidable effects.</p> | | This comment is noted. The Holford Rules were followed in the design and routeing of the Proposed Development. However, in terms of developing landscape mitigation measures, the use of the Holford Rules provides minimal guidance. The use of professional judgement was more relevant in the development of landscape mitigation measures in terms of landscape planting and design. |
| | Chapter 4 sets out in a single paragraph at 3.6.1 that proposed landscaping would be maintained through replacement of dead or damaged stock for five years, although the assessment relies on proposed planting establishing over a period of fifteen years to mitigate effects. | | This comment is noted. Proposed landscaping would be maintained for five years which was established as an adequate time frame through precedence and model provisions. Following five years post construction, planting should be established at the end of this aftercare period. The planting would then continue to mature and grow over a further 10 years, mitigating effects from the Proposed Development. |
| | In light of guidance contained in paragraphs 2.8.7 and 2.8.11 of EN5 and paragraph 5.161 of the NPS for National Networks and the intention of the Holford Rules, IACC considers that the applicant should provide a landscape and habitat management plan covering a period of fifteen years. Some elements such as reinstated farmland might only take a year or two to become established, but others like woodland and hedges might take up to fifteen years. Landscape management requirements will be more onerous in the first few years and would reduce in intensity and frequency over time | | Any landscape mitigation planting would be maintained until it is established as part of an approved mitigation planting scheme which would cover a 5-year period. Once established planting will mature to allow for an assessment of long-term residual landscape effects of the Proposed Development, which typically would remain after a minimum fifteen years. The assessment considers the effects of secured maturing mitigation planting, as identified in the Schedule of Mitigation (Document 5.28). Landscape planting around THH/CSEC and the extension of Pentir Substation would be retained as part of the National Grid's operational land holding. |
| | <p>Operational and Construction Noise</p> <p>The level of detail that will be required to inform the noise and vibration assessment has not been provided in sufficient detail. It is expected that</p> | | Details of noise generating potential of conductors and insulators are described in ES Chapter 16 Operational Noise (Document 5.16). |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>additional information will be provided in the technical chapter expected in Batch 3. For example:</p> <p>Timescales have not been provided for all temporary works, which will hinder interpretation of assessment if timescales are not included in the technical chapter.</p> <p>Detail of noise generating potential of conductors and insulators.</p> | | <p>Noise and vibration generated from tunnelling has been modelled and the results presented in Appendix 9.18.</p> <p>Underwater Construction Noise Modelling and Assessment Report (Document 5.9.2.18). These results have been assessed in Chapter 9, Ecology and Nature Conservation (Document 5.9).</p> |
| | <p>Construction Plans</p> <p>The following information would be expected, however it has not been provided on the Construction Plans or the associated Chapter 4:</p> | | This comment is noted. |
| | <p>Landscape and visual</p> <p>Arboricultural information or other existing landscape features. This information should be included on these or another set of referenced plans in the final ES, and should be subject to engagement with IACC.</p> | | Arboricultural information is provided in the Arboricultural Impact Assessment (Document 5.30) |
| | <p>Detail of any measures to protect retained vegetation or other valued landscape elements from the works.</p> | | Arboricultural information is provided in the Arboricultural Impact Assessment (Document 5.30) |
| | <p>Clearance and alteration to vegetation required for bellmouths visibility splays. Annex A of Appendix 4.1 provides a useful set of plans at 1:1000 identifying the visibility splays for each temporary access. Chapters 3 and 4 provide high level description of how vegetation could be cut to a specified height and that some visual obstacles would need to be removed. For the assessment, and mitigation through reinstatement or replacement, the applicant will need to understand and clearly show what vegetation would be affected and how. This more detailed information needs to be provided spatially, in plan for each temporary access. The applicant should overlay existing vegetation on the Annex A plans (or similar alternative plans) and the National Grid and Third Party Construction Plans.</p> | | <p>The extent of vegetation removal/trimming will be related to the final traffic control measures agreed with the Highway Authority.</p> <p>Mitigation measures have been proposed to reduce vegetation loss in visibility splays, for example within the OCTMP (Document 7.5) speed restrictions have been proposed</p> |
| | <p>The plans show 7.5-12m wide access track swathes along the whole route. It is not clear whether these have been aligned to minimise effects on landscape elements, nor is there any means of quantifying effects on different landscape elements and habitats.</p> | | The locations of all temporary access tracks have been the subject of review by all technical assessment teams. |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | It is not clear from the plans, what effect working areas for existing and proposed pylons would have on existing landscape elements, particularly hedgerows. | | All hedgerow and tree losses are shown on the Trees and Hedgerows Potentially Affected Plans (Document 4.11). |
| | It is not clear from the documents provided whether conductor pulling positions could require topsoil strips. Nor is it clear whether the positions would occupy the whole or just part of the orange hatched areas on the Construction Plans. The applicant should clarify on plans whether any vegetation loss or alteration is anticipated as a result of the conductor pulling positions or process | | Pulling positions would not require a topsoil strip. Further information regarding likely dimensions is provided in Chapter 4 Construction Operation, Maintenance and Decommissioning of the Proposed Development (Document 5.4). |
| | If the reinstatement measures are to be relied upon as mitigation, the Construction Plans and/or the Works Plans should identify all post construction landscape reinstatement measures. | | 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>The construction plans identify only seven landscape mitigation areas, the most substantial three of which are associated with major new non-linear infrastructure. Those shown are limited to:</p> <ul style="list-style-type: none"> • Carrog Isa, northeast of pylon AZ 015 • Land north of Neuadd Wen, south of pylon AP 061 • Gylched Covert, south of pylon AP 068 • Land south of pylon AP073 • Braint THH/CSEC compound • Ty Fodol THH/CSEC compound • Pentir Substation | | <p>Noted. The seven landscape mitigation areas outlined within this comment reference only the areas where permanent rights over land have been included within the Order Limits for the purpose of mitigation planting.</p> <p>Replacement planting of lost vegetation, such as hedgerows, trees and boundary features extends beyond these seven areas, to areas within the Order Limits of the Proposed Development. This is shown on the Reinstatement Plans (Document 7.4.1.1). Reinstatement will be in accordance with the relevant parts of the BMS (Document 7.7) which include making good of any damage or disturbance to any soil structure, native or other planting, grass, fencing, hard landscaping or structures, where in-situ reinstatement is possible.</p> <p>Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13)</p> |
| | In light of our comments above in respect of the Holford Rules and landscape management (p16), the quantum of mitigation proposed is considered inadequate to mitigate landscape effects anticipated in light of IACC's contention that landscape enhancement will be necessary, in the form of additional woodland planting. | | A need for additional woodland planting has not been identified as a result of the landscape or visual assessment (Documents 5.7 and 5.8). |

Table 1: Isle of Anglesey County Council

| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
|---------------------------------|---|----------------|--|
| | <p>Replacement planting should be shown on these plans or on another similar set of plans such as the Works Plans. This will fall into two categories:</p> <p>In situ replacement planting – planting that can be replaced in or very close to the site of loss. This can also be classed as reinstatement planting as in hedgerows, but it is recommended that trees are replanted at a ratio of 4 new for every one lost. This is to ensure reliable establishment and ultimately result in one healthy replacement tree.</p> <p>Proximate on-site replacement planting – Where for operational reasons planting cannot be replaced in situ, it should be replaced as close as possible to the site of loss, but within the DCO limits.</p> | | Reinstatement proposals are shown on Figure 1 Reinstatement Plans (Document 7.4.1.1). |
| | The vast majority of the potential mitigation opportunities highlighted in the Google Earth landscape information, issued during TWG meetings (summer 2017), is not depicted on these or any other submitted Batch 1 documents. | | This information is shown on the Trees and Hedgerows Potentially Affected Plans (Document 4.11), the Figure 7.17 Effects on Landscape Elements (Document 5.7.1.17) and Figure 1 Reinstatement Plans (Document 7.4.1.1). Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13) |
| | The construction plans do not refer to any landscape mitigation in the vicinity of Wylfa Power Station. NG should consider opportunities for proximate onsite replacement planting in the substantial vegetated area to the southeast of the power station | | Reinstatement proposals are shown on Figure 1 Reinstatement Plans (Document 7.4.1.1). Horizon Nuclear Power is proposing substantial remodelling of this area and it is not therefore possible to present additional detail at this stage. |
| | All of the above applies equally to the Third Party Construction Plans. The applicant is expected to propose mitigation for landscape and visual effects resulting from these works too | | The third party construction works to underground services would undergo the same reinstatement as the main works. The removal of services would be a landscape and visual benefit by reducing visual clutter. Additional mitigation would not be required. |
| | <p>Ecology and Nature Conservation</p> <p>Extent of Order Limits: The shape and extent of the Order Limits in places needs to be carefully reviewed against ecology (and other) technical chapters to ensure baseline data gathering has covered all correct areas; for example, long access tracks such as those east of pylons ZA044 and ZA045 north of Maenaddwyn are some distance from the main alignment. In other areas, such as south of AP052, what appears to be a long access track across open fields (linking the OHL route</p> | | Ecological surveys were undertaken using the defined methodologies and extents. Where changes in the Order Limits have occurred, ecological surveys have been updated accordingly. Where this has been undertaken in 2018, due to timescales, some results are supplied in separate baseline reports and will be provided in an ES addendum. However it is confirmed that all surveys required in order |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | to Erddreiniog properties) is included within the Order Limits. No relevant symbols are included on the keys to each Construction Plan to identify what has been included. | | to support the assessment of effects of the Proposed Development have been undertaken. |
| | Extent of works at Wylfa Newydd: The DCO boundary includes woodland south of the substation; it is our understanding that removal will be very limited, but this cannot be evaluated here, as the majority of existing woodland appears to be under the 'Conductor Piling Positions' layer. As per landscape comments, no ecology mitigation area is defined for woodland loss in this area. | | Horizon Nuclear Power is proposing substantial remodelling of this area and it is not therefore possible to present additional detail at this stage. |
| | Great crested newt mitigation measures: The construction plans do not include any details on ecology mitigation, notably for great crested newts. In particular, we note pond 23 near Rhosgoch supports a population and is within the Order Limits (just north of pylon AP021). Details of mitigation will be included in the technical chapter we assume, but it would appear that no ecology/landscape mitigation areas are proposed in this area. This suggests either nothing is proposed or all will have to be accommodated within DCO Order Limits. The population in this pond is linked to others to the north, and no measures are shown as to how animals will cross the intervening working area which includes the NG access and new pylon working areas. | | Great crested newt (GCN) are discussed in the ecology Chapter 5.9, Ecology and Nature Conservation (Document 5.9) and associated Appendix 9.6 Great Crested Newt Report (Document 5.9.2.6), with mitigation areas for GCN identified and discussed in the Biodiversity Mitigation Strategy (BMS) (Document 7.7). This also discusses options for aiding dispersal. Further details of this would appear in the GCN EPS licence following discussions with NRW. |
| | Reptile mitigation areas: Although the plans show seven landscape mitigation areas, it is unclear if these are also for ecology; we are aware that some protected species, notably reptiles, have been found in various locations. No mitigation areas are identified within the DCO boundary that appear to relate to reptiles. It is assumed that mitigation will occur within the currently proposed red line boundary; however the applicant has been encouraged at TWGs to carefully consider receptor sites for reptiles as suitable location may not be available in adjacent habitats. | | Reptiles are discussed in the ecology chapter 5.9, Ecology and Nature Conservation (Document 5.9) and associated Appendix 9.9 Reptile Report (Document 5.9.2.9), with mitigation identified and discussed in the BMS (Document 7.7). |
| | Llyn Alaw SSSI: The construction plans for the sections of the route near Llyn Alaw reservoir do not indicate if any flight diverters will be fitted to the OHLs in this area as discussed with NG at TWGs; this may be too fine a level of detail for this set of plans, but we expect consideration of such mitigation within the ecology chapter and subsequent detailed design plans | | Ecological mitigation is summarised in the ecology chapter 5.9, Ecology and Nature Conservation (Document 5.9), and detailed in the BMS (Document 7.7); however flight diverters were not considered as no likely significant effects were identified. |
| | Gylched Covert Wildlife Site: This is a notified Wildlife Site that we know will be impacted by construction of the new OHL. Whilst the whole woodland area is included within the Order Limits, no additional land is identified for ecological or | | Ecological mitigation is summarised in the ecology chapter 5.9, Ecology and Nature Conservation (Document 5.9), and detailed in the BMS (Document 7.7). The area of mitigation planting for the |

Table 1: Isle of Anglesey County Council

| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
|---------------------------------|---|----------------|--|
| | landscape mitigation here. We understand that a substantial part of the site will be modified and as such mitigation will be needed. As such this must be within the Order Limits, but there appears little room for woodland replacement. The Applicant has discussed enhancements in this area (which could fall outside Order Limits) but clearly identified mitigation areas are needed and assurances required that these can be offered under a s.106 agreement if they are outside the Order Limits. | | covert is included in the Order Limits at the western side of the woodland. |
| | Bat Barn: The Applicant has informed us that they have / will acquire a farm building as part of the compulsory purchase process for the scheme; this has been identified as an ecological opportunity to mitigate / enhance the area of bats. The location of the building has not been disclosed at this point, but we understood it is within the Order Limits. As such, it should be identified on the construction plans and confirmed as an ecology 'mitigation area' or suchlike. | | Use of the potentially acquired farm building is not required for mitigation for bats as a result of the Proposed Development. Potential enhancement measures are not included within the ES or BMS. Enhancement opportunities are presented in the Enhancement Strategy (Document 7.13). |
| | Heathland habitat at Pentir: Construction plans show a compound and other works to the south of the access track to the Pentir substation; we are aware of ecologically sensitive habitats in this area that will be discussed in the technical chapter, however any loss of heathland or other priority habitat should be avoided where possible; failing this we expect full quantification and mitigation measures set out. | | Ecological mitigation is summarised in the ecology chapter 5.9, Ecology and Nature Conservation (Document 5.9), and detailed in the BMS (Document 7.7); however the area of affected heathland does not fall within the compound, will not be affected permanently and will be reinstated on completion. |
| | Disposal of arisings from tunnelling: It is unclear from the Plans alone (or indeed up front chapters) the exact details of tunnel waste storage and disposal. Around both ends of the tunnels routes away from the THHs are shown, but we are unsure if all materials will simply be removed on excavation, or will be stockpiled; if so, where such stockpiles are located and how long they may be there needs to be clearly understood | | This is detailed in the Outline Waste Management Plan (Document 7.5). |
| | Widths of Access Tracks: As raised for landscape, the plans show broad NG access tracks crossing numerous field boundaries with walls, hedges and other linear features; we have previously been told at TWGs that these would be reduced in width at such crossing points, limiting hedge loss and other ecological impacts; however no such narrowing is shown. Habitat losses should be fully quantified within the ecology and nature conservation chapter, assuming reasonable worst case scenarios | | Habitat losses for hedgerows are presented in the ecology chapter 5.9, Ecology and Nature Conservation (Document 5.9). As stated in the chapter, losses are calculated on a worst case scenario of the full width of the access track swathe of 12 m however it states that this will be reduced to 5 m where at all possible and already aims to cross at a large number of existing gates and gaps within the hedgerow such that the worst case figures given for loss would never occur. |
| | A number of the drainage mitigation areas have access tracks passing through them (see especially Section D Option B sheet 4) however it is not clear what | | Experienced drainage consultants have been employed to ensure that sufficient space has been allowed within the Order Limits at |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | they comprise of and how the pollution risk from the access track is due to be managed. Clarification on whether these areas are sufficiently sized or whether there is a residual risk that the Order Boundary may need to be extended should be provided | | those lower lying parts of the route to accommodate drainage control and management measurements. |
| | <p>Noise and Vibration</p> <p>Without the generic layouts for construction sites and the construction noise and vibration assessment, it is difficult to determine whether the plans are adequate to support the assessment.</p> | | <p>The construction noise assessment is presented in ES Chapter 15 Construction Noise and Vibration (Document 5.15). Illustrative construction compound layouts are provided as follows;</p> <ul style="list-style-type: none"> • DCO_DE/PS/12_01 Sheet 1 of 5 (Document 4.13) – Illustrative Overhead Line Construction Compound; • DCO_DE/PS/12_02 Sheet 2 of 5 (Document 4.13) – Illustrative Tunnel and cable Sealing End Construction Compound – Braint; • DCO_DE/PS/12_03 Sheet 3 of 5 (Document 4.13) – Illustrative Tunnel and cable Sealing End Construction Compound – Tŷ Fodol; • DCO_DE/PS/12_04 Sheet 4 of 5 (Document 4.13) – Illustrative Substation Construction Compound – Wylfa; and • DCO_DE/PS/12_04 Sheet 5 of 5 (Document 4.13) – Illustrative Substation Construction Compound – Pentir. |
| | DCO_F/NGCON/PS/01 Sheet 1 of 5 (Document 5.4.1.1) includes the Braint Construction Compound. Taken with the project description in Chapter 4, it is not possible to determine whether any mitigation of construction noise is proposed using screening – no noise mitigation screening has been indicated which suggests that this has been scoped out, however without the assessment results of the technical chapter it is difficult to provide commentary. | | Chapter 15 Construction Noise (Document 5.15) has assessed the indicative compound layout shown on this figure, and the results confirm that the noise levels generated would be acceptable, and would not require screening. However the use of screening is not ‘scoped out’, as the final layout could change and screening could be required as a result. |
| | <p>Temporary Access Principles Note</p> <p>Detail is provided on the key principles and methodology used to establish the suitability of each temporary access point. In Section 1.2.3, a number of supporting documents are referenced. It is likely that information included in documents such as the Draft Construction Traffic Management Plan (CTMP), Transport Assessment (TA) and Abnormal Load Report, will have information of relevance to fully assess the adequacy of each access point. Furthermore,</p> | | Discussions with IACC have been ongoing and an update was provided to IACC at a meeting to discuss the CTMP on 24/5/2018 about the status of supporting information referred to in the comment. The Road Safety Assessment and Audit have been removed from the submission documents due to the need for them to be updated with the requested information, and these documents will be updated and shared with IACC separate to the submission process. |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | Section 6 provides reference to the Road Safety Assessment and Audit. It has previously been noted (in a response from the Council dated 24/11/2017) that a number of pieces of information were not provided to the audit team (i.e. turning information, details of where revised speed limits begin/end, swept path information). It is expected that the audit will be updated once this information becomes available, and the updated version will be shared in Batches 2 – 4 of the documents. | | |
| | On the basis of the above, above the detail contained in the document is not considered to be adequate. | | See above. |
| Question 3: Is there anything missing? What are the gaps? Do you have any views on the impact assessment by National Grid? | General comment on Question 3: The chapter would benefit from further information on the activities detailed in the plans, for example what occurs at a conductor pulling station and what interventions are intended at locations of landscape and drainage mitigation. It is expected that some further information will be provided in the technical chapters in Batches 2 – 4 | | Noted |
| | Construction Plans Yes, there is missing information. See comments on question 2, above. | | Noted |
| | Temporary Access Principles Notes There are a number of points whereby clarifications and further information is required to allow IACC to fully determine the adequacy of each temporary access point. These clarifications are provided below: | | Noted |
| | It is noted in the Temporary Access Schedule table provided in Annex A, that the E5A access point has been included as a 'new' proposed junction. Visibility splays have been provided (2.4m x 90m) on the drawing associated with this junction. From the information provided in the Draft Temporary Access Principles Note, it is not clear whether this is based on speed survey results. In the absence of speed surveys for this junction, it is recommended that surveys are commissioned to understand existing speed conditions at this location. | | Speed surveys have been undertaken and the revised Temporary Access Principles Note clarifies the approach taken with regards the visibility at E5A. |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | Previous comments made, dated 14 December 2016 ref. 'North Wales Connection Project – Review of National Transport Grid Temporary Access Principles Note' relate to the stacking of HGVs at TARs. The document does not provide any comments on the use of stacking the provision of a facility for stacking at Temporary Access Roads. It is considered that a quantified assessment of the access points should be provided as part of the Transport Assessment. This will allow the Council to understand the implications of access proposals across the Local Road Network (LRN). | | The Transport Assessment (Document 5.13.2.1) provides quantitative assessment of the traffic effects arising from the Proposed Development. |
| | The IACC would insist on the use of 2.4m 'x' distances for visibility. The use of a 2m 'x' distance should only be used at "very lightly trafficked and slow speed situations" (TAN18). Any temporary access that proposes to use a 2m 'x' distance shall be submitted to the IACC for approval; | | Discussions have been ongoing with IACC highways on the need to ensure appropriate visibility is provided on a location by location basis. A Temporary Access Schedule has been produced, issued and commented on and will continue to be developed. |
| | Each of the drawings provided in Annex A make reference to potential mitigation measures. Agreement on mitigation proposals with the Council is required prior to the commencement of construction of the access points (see Section 4). It is expected that the Council will have the opportunity to meaningfully engage on mitigation proposals with the sharing of additional documents in Batches 2 – 4. | | Noted. |
| | As previously requested, National Grid's Design Risk Register should be submitted to IACC for review. This register should identify risks associated with using the proposed haulage routes and temporary access points, as well as identifying appropriate mitigation measures that may be implemented. | | Noted. This has been issued separately to IACC and discussions will continue around the identified risks and control measures as the Outline CTMP (Document 7.5) progresses. |
| | The temporary bellmouth drawings (point 6) state the "potential to bring the Give-Way line on Minor Arms further into the Major Arm". The IACC would have concerns with the potential to narrow the carriageway width on the Major Arm as a result of moving the give-way line and the consequential hazards to road users as a result of this narrowing | | Noted. |
| Question 3: Is there anything missing? What are the gaps? Do you have any views on the | Reinstatement proposals regarding temporary working areas have not been provided. Further detail with regards to landscape management, spoil management and topsoil management is required. | | Topsoil management is outlined in section 9 of ES Chapter 18, Agriculture (Document 5.18), Outline Waste Management Plan (Document 7.5), Outline Soil Management Plan (Document 7.10) and the CEMP (Document 7.4). |
| | Construction Plans | | |

| Table 1: Isle of Anglesey County Council | | | |
|---|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| impact assessment by National Grid? | No. See comments on question 2, above. | | |
| | <p>Temporary Access Principles Note</p> <p>The approach to identifying mitigation measures has been provided in Flow Chart 4.3 (Section 4.3). The precise detail of these measures have not been confirmed as part of the Draft Temporary Access Principles Note. It should be noted that any mitigation measures should be agreed in advance with the Council's officers. It is understood that the Construction Traffic Management Plan, provides further detail on monitoring, review and improvement process. This document has not been provided as part of Batch 1 and the adequacy of these has not been fully determined as part of this review. The Council will be able to provide further comment following the receipt of documents in Batches 2 – 4.</p> | | An Outline Construction Traffic Management Plan (OCTMP) (Document 7.5) has been provided in draft and was discussed at a meeting with IACC in May 2018. |
| | <p>Furthermore, as part of IACC's response provided in December 2016, it was requested that a dedicated officer should be funded through an appropriate funding mechanism. National Grid have confirmed that they are considering a funded Traffic Management Supervisor as part of the Mitigation and Enhancement Measures. The Council support the provision of a dedicated officer, as it will form a necessary function to allow for on-going monitoring and implementation of mitigation measures proposed as part of the National Grid proposals. The details of this provision should be established as part of a wider discussion on a s106 heads of terms prior to examination.</p> | | Discussions with IACC on the need for a Transport Management Supervisor are ongoing and the OCTMP (Document 7.5) includes for a Traffic Control and Safety Officer and a Transport Review Group. |
| Question 5: Are there any changes or inconsistencies in the project detail following on from s42 or any Thematic Working Group? | <p>Construction Plans</p> <p>No.</p> | | |
| | <p>Temporary Access Principles Note</p> <p>Yes. A response to the comments made by the Local Highways Authorities is provided in Annex C of the Draft Temporary Access Principles Note. A review of the responses has been undertaken to understand where comments/changes have been incorporated as part of the Draft Temporary Access Principles Note. A summary of this review is provided below:</p> <p>IACC has requested that timescales are agreed with highways officers prior to the commencement of work (and mitigation) at all temporary access locations. Section 4.3.3 has been updated to state "The monitoring requirements will vary at different locations and therefore the timescales within Flow Chart 4.3 are</p> | | <p>Noted.</p> <p>There have been ongoing discussions with IACC highways on the need to ensure appropriate detailed design and specification, on a location by location basis. A Temporary Access Schedule has been produced, issued and commented on and will continue to be developed to reflect appropriate specifications.</p> |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>indicative and would be agreed with the LHAs prior to commencement of works. The CTMP (Document 7.7) provides further details on monitoring, review and improvement processes”.</p> <p>It is anticipated that the provision of temporary access points are likely to have significant ecological and environmental impacts at each location. National Grid have confirmed that they are liaising with relevant officers at IACC with regards to visibility splays included in the Environment Impact Assessment. It is not clear from the information presented in Annex A that any changes have been made to the extents of changes to vegetation. National Grid are required to ensure the mitigation measures are appropriate and address the concerns of IACC’s highways and ecology officers.</p> <p>At the request of IACC, National Grid have removed the ‘absolute minimum’ visibility splay line from the access points provided in Annex A.</p> <p>At the request of IACC, National Grid have provided scaled drawings of the temporary access points provided in Annex A.</p> <p>IACC has previously stated that the first 5 metres from the nearside edge of the County Highway must be completed with a bitumen surface. These changes have not been included in the Draft Temporary Access Principles Note, however, National Grid have confirmed that the construction drawings will be revised accordingly (presumably as part of the planning application and in advance of any works)</p> | | |
| | <p>In terms of the comments made on each of the temporary access points, National Grid have provided a summary in the Temporary Access Schedule table in Annex A. As per the comments made in Section 3, further speed surveys are required to determine the visibility splays at new access points included in the draft document</p> | | A speed survey was undertaken at new access point E5A (completed January 2018) and this is included in the latest Temporary Access Schedule. |
| Volume 5, Chapter 6, EIA Methodology and Basis of Assessment | | | |
| Overall Conclusion of Factual Assessment | The chapter has been updated since S42 to provide a more detailed breakdown of the proposed EIA approach. The chapter contains reference to documents | | Noted, much of the referenced documentation was provided in later batches. |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | and information which IACC has yet to be consulted on, however it is expected that this will be provided in Batches 2 – 4 of NG's draft application documents. | | |
| | <p>The chapter could be updated with the following information to provide further clarity on the approach:</p> <ul style="list-style-type: none"> • Role and methodology for determining mitigation measures including compensation and enhancement. • Below ground Limits of Deviation with respect to continuing archaeological investigations. • Approach for including/discounting related developments for Cumulative Impact Assessment. • Role of HIA in the ES and proposed methodology. | | <p>The approach to mitigation is topic specific. Compensation and Enhancement are not considered to be mitigation measures. Enhancement opportunities are presented in the Enhancement Strategy (Document 7.13).</p> <p>There are no below ground Limits of Deviation set in respect to archaeological investigations, however an Archaeological Strategy has been prepared which is presented as Document 7.8.</p> <p>The approach to including/discounting related developments is discussed in Chapter 20 Inter-Project Cumulative Effects (Document 5.20).</p> <p>Issues related to health are considered in the Well-Being Report which is presented as Document 5.27.</p> |
| Question 1: Does the information provide sufficient detail/clarity on National Grid's proposal/position? | The Chapter has been updated since S42 to provide further detail with regards to the EIA process and its basis, which is welcomed. This includes a helpful breakdown of the assessment process in Section 4.9. | | Noted |
| | The additional commentary regarding application of a Rochdale Envelope approach by NG and the flexible aspects of the proposed development is helpful. It is important the Rochdale Envelope and its implications on the EIA are carried through to the technical chapters, and informed by on-going dialogue with the Councils to ensure the assessment remains robust and there is a clear articulation of the proposed development. | | Each technical chapter explains, in section 5, how account has been taken of the flexibility afforded by the draft DCO to ensure a robust assessment. |
| | The document refers to a number of documents which have not been provided in the Batch 1 review however it is expected that these will be provided in Batches 2 – 4 to enable the Council to meaningfully engage on the full draft application. A list of these documents has been provided in response to Question 3 below. | | Noted. Further information provided in response to Question 3 below. |
| | The additional information provided with regards to Future Baseline for various disciplines is welcomed. It is expected that the Council will be able to meaningfully engage on the proposed approach with the receipt of technical chapters (Batches 2 – 4). | | Noted |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| Question 2: Is the detail submitted adequate (ie, in order to make an assessment)? | The detail provided in the Chapter is considered to be adequate for its purpose | | Noted |
| | There are points raised at S42 which are yet to be addressed however are expected to be addressed through the receipt of technical chapters. These are provided in response to Question 3. | | Noted |
| Question 3: Is there anything missing? What are the gaps? Do you have any views on the impact assessment by National Grid? | As stated in response to Question 1 and 2, whilst the approach taken is considered to be sound, the document includes reference to information and documents which have yet to be provided which limits ability to comment on their appropriateness, including: | | Noted |
| | CEMP. As highlighted at Scoping and S42 it is expected that this will provide method statements at an appropriate level of detail to secure environmental control measures and relate to emerging outcomes of the EIA. | | Noted |
| | Quantitative assessments of predicted impacts to enable meaningful engagement throughout the sharing of draft ES chapters. | | Noted |
| | List of related developments. As suggested at S42, a list of projects considered in association with the project's cumulative impacts should be reviewed and confirmed by IACC. It is expected that this will be provided as part of Batch 4 documents which includes the Cumulative Impacts chapter. | | A list of projects considered in association with the projects cumulative impacts are provided within Chapter 20, Inter-Project Effects (Document 5.20). This chapter was provided in Batch 4, issued 23/02/2018. |
| | Cumulative assessments (incl. Combined Effects with Wider Works). This is expected to be shared in Batch 4 documents. It is considered essential that enough time is provided to enable the Council to meaningfully engage on these matters in advance of DCO submission. The Chapter would benefit from describing the approach taken to identify related developments. | | Chapter 21, Statement of the Combined Effects with the Wider Works (Document 5.21) was provided in Batch 4, issued 23/02/2018. |
| | National Grid have defined a number of temporary working areas. It is important that all temporary working areas are defined (including the anticipated periods of use) and assessed within the EIA and the Council seeks assurance that this will be the case in the final ES. | | Working areas are shown on Figure 4.1 of Chapter 4 Construction, Operation, Maintenance and Decommissioning (Document 5.4.1.1). The assessment has assumed that working areas would be in place for the duration of the construction period, however where relevant assumptions have been made about the likely duration/frequency of use. |
| | Paragraph 5.3.8 notes that a standard Limit of Deviation below ground has not been proposed. It is considered important that this is reviewed as the scheme progresses, in particular with regards to any emerging / identified below ground | | It is considered that not setting a limit on the depth to which works could be undertaken below ground is potentially beneficial in this |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | archaeological features and potential impacts. Considering that trial trenching at the Wylfa Newydd site has uncovered significant areas of archaeological interest (which were not uncovered through the magnetometer surveys), it is considered important that this is kept under review as potential exists for similar extents of archaeological areas of interest along the route. | | respect, as there would be no limit on the depth to which any previously unidentified archaeology could be excavated. |
| | As stated at Section 42, it is not clear how the consideration of health and wellbeing, including workshops in 2016 related to Health Impact Assessment will be integrated into the EIA, or submitted in support of the DCO application. Reference must be made within the EIA 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. It is expected that this will be provided at Batch 4 however it would be helpful to understand its role in the ES and the proposed methodology | | Intra-project effects are presented in Chapter 19, which also sets out the method used for assessment. Consideration of the output of the workshops held in 2016 is provided in the Well-being Report (Document 5.27). |
| | Section 4.11 Cumulative Effects refers to chapters 19-20. It is expected that these chapters will be provided at Batch 4. It is suggested that this chapter is updated to explain how cross-cutting issues are/will be handled to demonstrate that their assessment has been reviewed holistically. | | Noted Chapter 19, Intra-Projects Effects (Document 5.19) and Chapter 20, Inter-Project Effects (Document 5.20) were provided in Batch 4, issued 23/02/2018. |
| | In TWG meetings, National Grid has repeated the need to use the Wylfa Newydd baseline as a basis for much of the socio-economic assessment work. It is our understanding that the assessment will look at the NWCP initially and then the cumulative impact with the Wylfa Newydd project. It should be made clear that the cumulative impact would be undertaken regardless of the significance of any one particular aspect associated with the NWCP in isolation. | | ES Chapter 17 Socio-Economics (Document 5.17) presents assessments of both the Proposed Development alone and the Proposed Development together Wylfa Newydd Power Station. |
| Question 4: Are the mitigation proposals adequate and fir for purpose? | National Grid has updated the chapter to include reference to the proposed use of enhancement measures, which is considered to be appropriate. It is considered that the role of compensation or enhancement to achieve wider benefit has still yet to be clearly defined in Section 4.8, and that further dialogue is expected in relation to mitigation, enhancement and compensation opportunities to be secured by way of Requirements and s106 Obligations. | | Noted, National Grid undertook further discussions with IACC in advance of submission in relation to potential enhancement opportunities, Requirements and s106. |
| Question 5: Are there any changes or inconsistencies in the | Yes. Three sets of alternative scenarios have been proposed: <ul style="list-style-type: none"> A and B (OHL route alternatives) | | Noted |

| Table 1: Isle of Anglesey County Council | | | |
|---|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| project detail following on from s42 or any Thematic Working Group? | <ul style="list-style-type: none"> 1 and 2 (tunnelling direction and direction for removal of materials) Construction traffic on existing A5025 / new alignment proposed by Horizon Nuclear Power | | |
| | It is understood that National Grid have undertaken and will be sharing the results of the assessment of each of these alternatives in each technical chapter. This is considered imperative in order to enable adequate engagement on the proposals with IACC in advance of DCO submission. | | It is confirmed that each technical chapter (Documents 5.7 to 5.18) takes into consideration the various scenarios, where appropriate. |
| | Paragraph 4.8.3 indicates that enhancements are proposed as part of the proposed development which is welcomed. Details have not been provided and it is stated that these will not be provided in full as part of the ES. It is expected that details of the proposed enhancements are shared as part of the Schedule of Commitments in Batch 2 of National Grid's draft documents. | | Enhancement opportunities are presented in the Enhancement Strategy (Document 7.13). |
| Volume 5, Chapter 7: Landscape Assessment | | | |
| Overall Conclusion of Factual Assessment | A) In general, the early sections of the landscape chapter are adequately detailed. In particular, the scope, study area, methodology, basis of assessment and the baseline are considered to be broadly adequate. | | Noted |
| | B) However, the assessments on susceptibility of landscape receptors are not considered robust. | | Additional clarity is provided in the chapter with regards to susceptibility. |
| | C) The baseline section should present existing landscape elements in detail on plan. | | An additional figure has been produced showing the existing landscape elements and the effects of the Proposed as Figure 7.17 (Document 5.7.1.17). |
| | D) The effects assessment should show further detail in the form of plans which spatially depict existing landscape elements to be lost and retained. | | This information is shown on the Trees and Hedgerows Potentially Affected Plans (Document 4.11). |
| | E) Mitigation planting proposed at 4 locations along the OHL route (document 5.7.1.13) is disproportionately low in quantum and inadequate to alleviate predicted landscape effects. | | Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13). |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | F) Further detail is required in the form of plans spatially depicting proposed landscape reinstatement mitigation proposals. | | 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). |
| | G) IACC Is continuing to assess the mitigation proposals at tunnel head houses / CSECs and Pentir substation in light of the Draft Design Guide and a more detailed response will follow in due course. | | Noted |
| Question 1: Does the information provide sufficient detail/clarity on National Grid's proposal/position? | Yes in respect of the Design Measures (DM) mitigation built into the proposed development. | | Noted |
| | Not in respect of the Control and Management Measures (CMM) mitigation to reinstate the landscape following construction. | | 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). |
| | Not in respect of Mitigation Measures (MM) as these are considered inadequate to alleviate the adverse landscape effects predicted | | Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13). |
| Question 2: Is the detail submitted adequate (ie, in order to make an assessment)? | The scope, study area, methodology, basis of assessment and the baseline are broadly adequate. However, there remain some significant outstanding issues not yet addressed from previous consultation (see Section 6 below) which means that the detail submitted cannot be considered to be adequate. | | Noted and see sections below. |
| | There is no clear spatial information regarding existing landscape elements. The Baseline section of the chapter should provide detailed and spatial information on existing landscape elements. The effects assessment should present similar detailed and spatial information on where and how these would be directly affected by the proposed development. Both IACC and the Examining Authority will need adequate detail on this in order to understand the magnitude of change to landscape elements and the consequent overall effect on character and how this has been assessed. | | An additional figure has been produced showing the existing landscape elements and the effects of the Proposed as Figure 7.17 (Document 5.7.1.17). |
| | Prior to the submission of the final ES, it is requested that National Grid clarifies how the impacts on vegetation and other landscape elements is to be presented | | An additional figure has been produced showing the existing landscape elements and the effects of the Proposed as Figure 7.17 (Document 5.7.1.17). |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| Question 3: Is there anything missing? What are the gaps? Do you have any views on the impact assessment by National Grid? | The assessment of susceptibility of landscape receptors incorrectly applies standard LVIA methodology in identifying what makes a receptor susceptible to change | | See comments below |
| | For example, at 9.3.11 on pp 133, susceptibility of field boundaries is judged to be high 'because their removal may be required to facilitate construction'. This statement indicates that the field boundaries might experience change, which forms part of the assessment of magnitude. It is not relevant to judgements on the receptor's susceptibility to the type of change proposed. | | The methodology applies value, then susceptibility then magnitude. The wording of the final chapter has been updated to help clarify this approach. |
| | Another example of a questionable assessment of receptor susceptibility is at 9.3.2. The assessment should be made as to whether trees, as a landscape element in each Section or VSSA, are susceptible to change of the type proposed without undue consequences for the quantity, quality and condition of tree cover in the local area. | | As above |
| | Paragraph 4.5.15 of the Landscape Assessment, Document 5.7, refers to the GLVIA 3 definition of the susceptibility of landscape: <i>"the ability of the landscape receptor... to accommodate the proposed development without undue consequences for the maintenance of the baseline situation and/ or the achievement of landscape planning policies and strategies".</i> | | As above |
| | For instance, see hypothetical scenarios below intended to assist in illustrating this point about susceptibility assessment In areas where a landscape is well vegetated and lots of good quality trees make an important contribution to its quality and character, then trees may be more susceptible. On the other hand, in an area with few or no valued trees making any contribution to its identity, quality or overall character, susceptibility of trees to the proposed change might be lower. | | As above |
| | It is considered necessary for National Grid to revisit assessments on landscape receptor susceptibility throughout the chapter. | | As above. |
| | Potential effects on landscape elements have been usefully summarised in Section 9.3 of Document 5.7. It is understood that the reinstatement (CMM) of landscape elements, as described in 7.20, is to be relied on as mitigation for direct effects on the landscape. Accordingly, it is considered essential that the reinstatement proposals are illustrated spatially on plans and accompanied by | | 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). |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | adequate design detail to offer the Examining Authority and IACC confidence that they can be delivered and will be effective over 15 years in restoring the fabric of the landscape to at least its current condition. | | |
| | For example at paragraph 11.4.5, the assessment of permanent effects on Dulas Bay Hinterland (Anglesey LCA 8) relies on the assimilating effect of replacement/mitigation planting particularly around Capel Coch. However, on document 5.7.1.13, there is no landscape mitigation (MM) proposed near Capel Coch. It is assumed that the assimilating effect is reliant on reinstatement Control and Management Measures (CMM), referred to here as 'replacement planting'. | | As above |
| | It is therefore considered essential that National Grid provide adequate detail in respect of where these measures are, what they comprise, what character they are designed to achieve and how they will be managed to achieve it. | | As above |
| | In advance of the final ES, it is considered essential that National Grid provide plans for consultation which show: <ul style="list-style-type: none"> Existing vegetation and other landscape elements to be protected and retained; Existing vegetation and other landscape elements that will be affected; and Mitigation and reinstatement proposals to alleviate effects. | | This information is shown on the Trees and Hedgerows Potentially Affected Plans (Document 4.11), the Figure 7.17 Effects on Landscape Elements (Document 5.7.1.17) and Figure 1 Reinstatement Plans (Document 7.4.1.1) |
| Question 4: Are the mitigation proposals adequate and fit for purpose? | <ul style="list-style-type: none"> Document 5.7.1.13 shows four small areas of woodland planting amounting to some 0.7Ha of woodland planting. This is a fundamental flaw in the mitigation proposals being put forward at this stage. Landscape mitigation limited to the areas proposed is inadequate to address the predicted significant permanent long term adverse landscape effects of the 38.2 km of 400kv overhead line on the following landscape receptors as well as other non-significant, but still adverse and permanent effects. Central Smooth Belt VSAA (YNSMNVS012); Eastern Smooth Belt VSAA (YNSMNVS017); South-West Ridges VSAA (YNSMNVS018); | | <p>Reinstatement proposals are shown on Figure 1 Reinstatement Plans (Document 7.4.1.1). Most of the landscape elements would be reinstated and no further mitigation has been identified to be necessary.</p> <p>The Enhancement Strategy (Document 7.13) sets out the details for a number of enhancement measures which could benefit landscape character including for example the enhancement of hedgerows and the creation of community woodlands.</p> <p>Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13)</p> |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <ul style="list-style-type: none"> Bethel (between Clynnog and Bangor) VSAA (GWNDDVS006) and Southern Anglesey Estatelands SLA | | |
| | <ul style="list-style-type: none"> The Assessment also predicts significant permanent adverse effects on the following LCAs: Dulas Bay Hinterland (Anglesey LCA 8) East Central Anglesey (Anglesey LCA 12); and Caernarfon Coast & Plateau (Gwynedd LCA 4) | | Noted |
| | It is not clear why National Grid has assessed effects on both VSAA's and on LCAs, and whether this leads to a potential double counting of landscape effects. It is recommended that National Grid clarify this in the assessment. | | 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 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. |
| | It is not clear why National Grid has not proposed mitigation around Wylfa and the Wylfa substation, to replace the loss of important screening vegetation in this area. It is recommended that National Grid addresses this, or explains why they have not. | | Reinstatement proposals are shown on Figure 1 Reinstatement Plans (Document 7.4.1.1). Horizon Nuclear Power is proposing substantial remodelling of this area and it is not therefore possible to present additional detail at this stage. |
| | There is considerable scope for additional tree planting and hedgerow planting and reinforcement at many locations along the route within the Order Limits. IACC has previously set out in page 12 of its Batch 1 response the NPS and policy basis in support of this mitigation which it considers it appropriate for National Grid to undertake - in the interests of brevity, that wording is not repeated here. However, IACC considers it essential that more is made of this opportunity to alleviate adverse effects and to improve the condition and quality of the landscape along the route. Arup have previously highlighted potential areas for such mitigation within and just beyond the Order Limits in an exchange of google earth .kmz files with National Grid's design team. | | Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13). |
| | The proposed reinstatement of landscape elements categorised as Control and Management Measures (CMM) are welcomed and considered to be essential to mitigate direct landscape effects. If, as stated in the header row of summary Table 7.25, these are relied upon as mitigation in the assessment of residual | | Reinstatement proposals are shown on Figure 1 Reinstatement Plans (Document 7.4.1.1). Additional planting would be offered to residents |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | effects, more detailed information is required in plan to provide confidence that effects would be adequately mitigated. Moreover, National Grid ought to clarify whether these proposals are being relied on to mitigate residual effects or not. | | as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13). |
| | No off-site enhancement planting has been proposed. Paragraph 2.8.7 of 'EN 5 National Policy Statement for Electricity Networks Infrastructure' states that the Holford rules should be taken into account in considering the need for any additional mitigation: <i>"The IPC should recognise that the Holford Rules, and any updates, form the basis for the approach to routeing new overhead lines and take them into account in any consideration of alternatives and in considering the need for any additional mitigation measures."</i> | | Reinstatement proposals are shown on Figure 1 Reinstatement Plans (Document 7.4.1.1). Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13). |
| | Paragraph 2.8.11 states: <i>"There are some more specific measures that might be taken, and which the IPC could require through requirements if appropriate, as follows:</i> <ul style="list-style-type: none"> • Landscape schemes, comprising off-site tree and hedgerow planting are sometimes used for larger new overhead line projects to mitigate potential landscape and visual impacts, softening the effect of a new above ground line whilst providing some screening from important visual receptors. These can only be implemented with the agreement of the relevant landowner(s) and advice from the relevant statutory advisor may also be needed; and • Screening, comprising localised planting in the immediate vicinity of residential properties and principal viewpoints can also help to screen or soften the effect of the line, reducing the visual impact from a particular receptor." | | Reinstatement proposals are shown on Figure 1 Reinstatement Plans (Document 7.4.1.1). Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13). |
| | Paragraph 5.161 of 'NPS National Networks' states that: <i>"Depending on the topography of the surrounding terrain and areas of population it may be appropriate to undertake landscaping off site, although if such landscaping was proposed to be consented by the development consent order, it would have to be included within the order limits for that application. For example, filling in gaps in existing tree and hedge lines would mitigate the impact when viewed from a more distant vista."</i> | | Reinstatement proposals are shown on Figure 1 Reinstatement Plans (Document 7.4.1.1). Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13). |
| | The Holford rules are intended to inform routeing decisions based on (amongst other things) features of the existing landscape. They are intended to aid the | | As above |

| Table 1: Isle of Anglesey County Council | | | |
|---|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | design process by setting out which embedded or 'primary' design mitigation measures should be considered when routeing and designing a line to avoid effects at source. It is a logical extension therefore to use them also to guide the design of 'secondary' landscape mitigation in order to reduce unavoidable effects. | | |
| | It is recommended therefore, that National Grid consider this national policy and guidance further in devising a more proportionate and meaningful mitigation strategy to include additional mitigation, whether on or off site. | | As above |
| Question 5: Are there any changes or inconsistencies in the project detail following on from s42 or any Thematic Working Group? | During the TWG meetings National Grid's landscape architect provided a series of Google Earth .kmz files showing trees and hedges which would be affected as well as proposed mitigation planting, but also suggested further mitigation and enhancement measures, some within the order limits and some off-site. As set out above in response to Questions 3 and 4, formalised versions of this information is considered essential to the DCO application process, but have not yet been provided. | | This information is shown on the Trees and Hedgerows Potentially Affected Plans (Document 4.11), the Figure 7.17 Effects on Landscape Elements (Document 5.7.1.17) and Figure 1 Reinstatement Plans (Document 7.4.1.1). Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13). |
| | Notably, the areas of trees shown in the .kmz files as 'to be affected' considerably exceed the 0.7ha of proposed tree planting identified under Question 4 above. There is therefore a stark inconsistency in the information being presented to IACC through the TWGs, and National Grid's current proposals. | | The 0.7 ha area does not take into account the planting around the THH/CSECs and Pentir Substation. The Trees and Hedgerows Potentially Affected Plans (Document 4.11) and Figure 1 Reinstatement Plans (Document 7.4.1.1) show the proposals for removal and reinstatement and additional mitigation shown on Figures 7.13-7.16 (Document 5.7.2.13-5.7.2.16) |
| | In Table 7.25, planting is considered as mitigation for construction effects. This is only possible if National Grid is committing to implementing mitigation planting well in advance of construction, which at present is not catered for or contained within the draft DCO. Mitigation description should therefore be moved down to operational effects rows | | Wording has been reviewed and addressed. |
| Volume 5, Chapter 8: Visual Assessment | | | |
| Overall conclusion on factual assessment | IACC considers that the scope, study area, methodology, basis of assessment and the baseline are broadly adequate. However, there are a number of inconsistencies between magnitudes of change and significance ratings | | Noted, the wording has been updated to remove inconsistencies. |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | identified in the assessment tables throughout the chapter. These will need to be addressed in the final ES. | | |
| | It is recommended that the assessments of receptor value are either omitted from, or further articulated into receptor types, on the Viewpoint Assessment Sheets | | The Viewpoint Assessment Sheets in Appendix 8.2 (Document 5.8.2.2) have been checked for consistency with the other assessments. The value stated on the viewpoint sheets is specific to that viewpoint and does not change on the viewer. However, aggregated views for a receptor e.g. a local community, may be higher or lower than one viewpoint individually. Text has been added to the assessment to clarify where this is the case. |
| | The baseline section needs to present existing landscape elements in detail on plan | | Landscape elements shown on Figure 7.17 Effects on Landscape Elements (Document 5.7.1.17) within ES Chapter 7 Landscape Assessment (Document 5.7). |
| | The effects assessment needs to present further detail in the form of plans spatially depicting existing landscape elements to be lost and retained | | Landscape elements shown on Figure 7.17 Effects on Landscape Elements (Document 5.7.1.17) within ES Chapter 7 Landscape Assessment (Document 5.7). This information is also shown on the Trees and Hedgerows Potentially Affected Plans (Document 4.11). |
| | Mitigation planting proposed at 4 locations along the OHL route (document 5.7.1.13) is disproportionately low in quantum and inadequate to alleviate predicted visual effects | | Reinstatement proposals are shown on Figure 1 Reinstatement Plans (Document 7.4.1.1). Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13). |
| | Further detail is required in the form of plans spatially depicting proposed landscape reinstatement mitigation proposals | | Reinstatement proposals are shown on Figure 1 Reinstatement Plans (Document 7.4.1.1). Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13). |
| | Comments on intra project and combined effects assessment are reserved until the relevant chapters have been issued and reviewed as part of forthcoming Batches. | | Noted and acknowledged. |
| | Comments on mitigation proposals at the Tunnel Head Houses/CSECs are reserved until consideration has been given to the Draft Design Guide. | | Noted and acknowledged. |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| Question 1: Does the information provide sufficient detail/clarity on National Grid's proposal/position? | Yes in respect of the Design Measures (DM) mitigation built into the proposed development. | | Noted |
| | Not in respect of the Control and Management Measures (CMM) mitigation to reinstate the landscape following construction. | | Reinstatement proposals are shown on Figure 1 Reinstatement Plans (Document 7.4.1.1). |
| | Not in respect of Mitigation Measures (MM) as these are considered inadequate to alleviate the adverse visual effects predicted. | | Reinstatement proposals are shown on Figure 1 Reinstatement Plans (Document 7.4.1.1). Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13). |
| Question 2: Is the detail submitted adequate (ie, in order to make an assessment)? | In general the visual assessment is adequately detailed. In particular the scope, study area, methodology, basis of assessment and the baseline are broadly adequate save any outstanding issues not yet addressed from previous consultation (see response to Question 6 below) and any specific additional comments below <u>However, there remain some significant outstanding issues yet to be addressed from previous consultation, which means that the detail submitted cannot be considered to be adequate.</u> | | Noted. Chapter 8 Visual Assessment (Document 5.8) was issued in May 2018. |
| | There is no clear spatial information regarding existing landscape elements. The Baseline section of the chapter should provide detailed and spatial information on existing landscape elements. The effects assessment should present similar detailed and spatial information on where and how these would be directly affected by the proposed development. IACC and the Examining Authority need adequate detail on this in order to understand the magnitude of change to landscape elements and the consequent overall effect on views and how this has been assessed. | | Landscape elements shown on Figure 7.17 Effects on Landscape Elements (Document 5.7.1.17) within ES Chapter 7 Landscape Assessment (Document 5.7). |
| | Prior to the submission of the final ES, It is requested that National Grid clarifies how the impacts on vegetation and other landscape elements is to be presented. | | This information is shown on the Trees and Hedgerows Potentially Affected Plans (Document 4.11), the Figure 7.17 Effects on Landscape Elements (Document 5.7.1.17) and Figure 1 Reinstatement Plans (Document 7.4.1.1). |
| Question 3: Is there anything missing? What are the gaps? Do you have any views on the | Potential effects on vegetation and boundaries have not been shown in plan or described in any detail in the assessment. It is understood that the reinstatement (CMM) of landscape elements has not been relied on as mitigation for visual effects. This should be clarified in the final ES. | | This is addressed in ES Chapter 17 Landscape Assessment (Document 5.17). |

| Table 1: Isle of Anglesey County Council | | | | | | | | |
|--|--|----------------|---|-----------------|------|---------------------------|--------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed | | | | | |
| impact assessment by National Grid? | It is considered essential that the reinstatement proposals are illustrated spatially on plans and accompanied by adequate design detail to offer the Examining Panel and the Council an understanding of whether they can be delivered and will be effective over 15 years in restoring the character of views to at least current conditions. | | Reinstatement proposals are shown on Figure 1 Reinstatement Plans (Document 7.4.1.1). Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13). | | | | | |
| | Replacement tree and hedgerow planting as part of the reinstatement proposals will make a considerable contribution to repairing visual damage caused by construction and would help assimilate the development into local views. We are eager to discuss this further with National Grid to see how this can be achieved and maintained. It is considered essential therefore that National Grid provide plans for consultation in advance of the final ES, which show: <ul style="list-style-type: none">Existing vegetation and other landscape elements to be protected and retained;Existing vegetation and other landscape elements that will be affected; andMitigation and reinstatement proposals to alleviate effects. | | This information is shown on the Trees and Hedgerows Potentially Affected Plans (Document 4.11), the Figure 7.17 Effects on Landscape Elements (Document 5.7.1.17) and Figure 1 Reinstatement Plans (Document 7.4.1.1). | | | | | |
| | There are several significant adverse residual effects predicted that do not appear to have been addressed through mitigation, and IACC is eager to discuss these shortcomings in the forthcoming TWG. It is considered that National Grid should undertake further work to design onsite mitigation, reinstatement and off site mitigation and /or enhancement measures to address | | Reinstatement proposals are shown on Figure 1 Reinstatement Plans (Document 7.4.1.1). Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13), but this cannot be relied upon in the assessment due to the voluntary nature. | | | | | |
| | The value of visual receptors is assessed and reported in adequate detail in Document 5.8 Chapter 8 Visual assessment. It is not therefore considered necessary to also provide an assessment of the value of views from each viewpoint in the Viewpoint Assessment Sheets. The value of the view depends on the receptor experiencing it from that representative viewpoint. For example, Vp 1/02 is identified on the corresponding Viewpoint Assessment Sheet to be of Medium value. However, it represents the following three groups of receptors each with its own Value assessed in the chapter text, which is confusing: <table><tr><td>Receptor group</td><td>Value</td></tr><tr><td>Local Community</td><td>High</td></tr><tr><td>users of the Road Network</td><td>Medium</td></tr></table> | Receptor group | Value | Local Community | High | users of the Road Network | Medium | |
| Receptor group | Value | | | | | | | |
| Local Community | High | | | | | | | |
| users of the Road Network | Medium | | | | | | | |

| Table 1: Isle of Anglesey County Council | | | | | | |
|--|--|-------------------------------|--------|--|----------------|--|
| Consultee and Section Reference | Comment | | | | Reference Code | How the comment has been addressed |
| | | users of Public rights of way | Medium | | | |
| | It is recommended that the value assessment is either taken off the Viewpoint Assessment Sheets or it is broken down by receptor type. | | | | | The value of the view does not change by receptor group as described above. |
| | The scope of projects included in the inter project cumulative assessment appears adequate. However the information provided in Section 10 of Draft Document 5.7 is very brief and incomplete. Therefore it is not possible to offer meaningful comment on the cumulative effects assessment. The council refers National Grid to earlier consultation responses in respect of inter-project cumulative landscape and visual effects assessment methodology (Summary of Thematic Working Group meetings to date, 4 December 2017, Section 2.1.1). | | | | | Section 10 of ES Chapter 8 (Document 5.8) has been updated to reflect updated information regarding Wylfa Newydd Power Station. |
| | At para 4.8.17; for the in-combination assessment where significant effects are predicted for one development in combination with insignificant effects from another, cumulative have been attributed to the projects giving rise to the more significant effect. It is understood how effects might be more attributable to one development more than another, but it is not clear how they could be attributable to only one development. It is not considered necessary to identify which development gives rise to cumulative effects, only to identify whether there would be cumulative effects on view (or the character of the landscape) and how significant they would be. | | | | | Section 10 of ES Chapter 8 (Document 5.8) has been updated to reflect a modified methodology. |
| | IACC (and very possibly the Examining Panel) will need to understand the rationale behind this assessment method. National Grid is requested to either provide further justification or to amend the methodology to ensure that all the assessments are correct and that none have erroneously attributed effects to other projects. | | | | | As above. |
| Question 4: Are the mitigation proposals adequate and fit for purpose? | <p>It is IACC's position is reserved in respect of mitigation measures around the THHs and CSECs at Ty Fodol and Braint and the substation extension at Pentir, shown on Documents 5.7.1.14-16 until additional consideration has been given to the Design Guide.</p> <ul style="list-style-type: none"> | | | | | Noted and acknowledged |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | It is not clear why National Grid has not proposed mitigation around Wylfa and the Wylfa substation, to replace the loss of important screening vegetation here. It is recommended National Grid addresses this or explains why they have not. | | Reinstatement proposals are shown on Figure 1 Reinstatement Plans (Document 7.4.1.1). Horizon Nuclear Power is proposing substantial remodelling of this area and it is not therefore possible to present additional detail at this stage. |
| | There is considerable scope for additional tree planting and hedgerow planting and reinforcement at many locations along the route within the Order Limits. IACC considers it essential that more is made of this opportunity to alleviate adverse effects and to improve the condition and quality of the landscape and views along the route. IACC's Framework Partner, Arup, have previously highlighted potential areas for such mitigation within and just beyond the Order Limits in an exchange of google earth .kmz files with National Grid's design team. | | This information is shown on the Trees and Hedgerows Potentially Affected Plans (Document 4.11), the Figure 7.17 Effects on Landscape Elements (Document 5.7.1.17) and Figure 1 Reinstatement Plans (Document 7.4.1.1). Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13). |
| | The proposed reinstatement of landscape elements categorised as Control and Management Measures (CMM) are welcomed and considered to be essential to the acceptability of the proposed development. If, as stated in the header row of summary Table 8.67, these are relied upon as mitigation in the assessment of residual effects, further more detailed information is required in plan to provide confidence that effects would be adequately mitigated. | | Reinstatement proposals are shown on Figure 1 Reinstatement Plans (Document 7.4.1.1). |
| | Document 5.7.1.13 shows four small areas of woodland planting amounting to some 0.7Ha of woodland planting. Landscape mitigation limited to the areas proposed is inadequate to address the predicted significant permanent long term adverse visual effects of the 38.2 km of 400kv Overhead line on the many visual receptors predicted to receive significant adverse and permanent effects. | | Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13). This measure cannot be relied upon at the individual receptor level. The 0.7 ha area does not take into account the planting around the THH/CSECs and Pentir Substation shown on the mitigation plans Figures 7.14-7.16 (Document 5.7.2.14-5.7.2.16). Reinstatement planting is also shown on Figure 1 Reinstatement Plans (Document 7.4.1.1). |
| | Paragraph 2.8.7 of 'EN 5 National Policy Statement for Electricity Networks Infrastructure' states that the Holford rules should be taken into account in considering the need for any additional mitigation: <i>"The IPC should recognise that the Holford Rules, and any updates, form the basis for the approach to routeing new overhead lines and take them into account in any consideration of alternatives and in considering the need for any additional mitigation measures."</i> | | As per comments on the landscape chapter |

| Table 1: Isle of Anglesey County Council | | | |
|---|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>Paragraph 2.8.11 states:</p> <p><i>“There are some more specific measures that might be taken, and which the IPC could require through requirements if appropriate, as follows:</i></p> <ul style="list-style-type: none"> • Landscape schemes, comprising off-site tree and hedgerow planting are sometimes used for larger new overhead line projects to mitigate potential landscape and visual impacts, softening the effect of a new above ground line whilst providing some screening from important visual receptors. These can only be implemented with the agreement of the relevant landowner(s) and advice from the relevant statutory advisor may also be needed; and • Screening, comprising localised planting in the immediate vicinity of residential properties and principal viewpoints can also help to screen or soften the effect of the line, reducing the visual impact from a particular receptor.” | | As per comments on the landscape chapter |
| | <p>Paragraph 5.161 of ‘NPS National Networks’ states that:</p> <p><i>“Depending on the topography of the surrounding terrain and areas of population it may be appropriate to undertake landscaping off site, although if such landscaping was proposed to be consented by the development consent order, it would have to be included within the order limits for that application. For example, filling in gaps in existing tree and hedge lines would mitigate the impact when viewed from a more distant vista.”</i></p> | | As per comments on the landscape chapter |
| | <p>The Holford rules are intended to inform routeing decisions based on (amongst other things) features of the existing landscape. They are intended to aid the design process by setting out which embedded or ‘primary’ design mitigation measures should be considered when routeing and designing a line to avoid effects at source. It is a logical extension therefore to use them also to guide the design of ‘secondary’ landscape mitigation in order to reduce unavoidable effects.</p> | | As per comments on the landscape chapter |
| | <p>It is recommended therefore, that National Grid consider this national policy and guidance further in devising a more proportionate and meaningful mitigation strategy to include additional onsite mitigation and off site enhancements.</p> | | As per comments on the landscape chapter |
| Question 5: Are there any changes or inconsistencies in the | <p>Para 11.2.4 and the bullet points below qualify the assessment findings by describing parts of communities with different levels of effect. This is not described clearly enough in the text and perhaps a better way of articulating this</p> | | This information is now presented on Figure 8.7 (Document 5.8.1.7). |

| Table 1: Isle of Anglesey County Council | | | |
|---|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| project detail following on from s42 or any Thematic Working Group? | would be on a set of colour visual effects plans showing which areas and which receptors would receive which levels of effects. | | |
| | In Table 8.17 the magnitude of change to most views from the community of Llanfechell is predicted to be medium during operation. This is inconsistent with the summary in table 8.67 where effects on highly sensitive views from the same community are assessed as minor during operation. Consequently, IACC considers that additional mitigation is required around Llanfechell, and is eager to continue discussions as to what this should comprise and how it would be secured | | Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13). |
| | Table 8.38 predicts a variety of magnitudes of change to VPs ranging from low to medium/high. The corresponding entry in Table 8.67 correctly assesses major significant effects. However the text in para 9.3.238 describes medium to low magnitudes of change and minor (not significant) effects. | | Inconsistencies have been addressed in the final chapter. |
| | These and other similar inconsistencies within the chapter need addressing in the final ES. | | Inconsistencies have been addressed in the final chapter. |
| | It is recommended that the summary table is cross checked for each receptor group to ensure consistency across the assessment. | | Inconsistencies have been addressed in the final chapter. |
| | During the TWG meetings National Grid's landscape architect provided a series of google earth .kmz files showing trees and hedges which would be affected as well as proposed mitigation planting, but also suggested further mitigation and enhancement measures, some within the order limits and some off-site. As set out above under items 3 and 4, formalised versions of this information are considered essential to the DCO application process, but have not yet been provided. | | This information is shown on the Trees and Hedgerows Potentially Affected Plans (Document 4.11), the Figure 7.17 Effects on Landscape Elements (Document 5.7.1.17) and Figure 1 Reinstatement Plans (Document 7.4.1.1). Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13). |
| | Notably, the areas of trees shown in the .kmz files as 'to be affected' considerably exceed the 0.7ha of proposed tree planting identified under Question 4 above. | | As above. |
| Volume 5, Chapter 9, Ecology and Nature Conservation | | | |

| Table 1: Isle of Anglesey County Council | | | |
|---|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| Overall conclusion of factual assessment: | Whilst the early sections of the ecology and nature conservation chapter are considered to be adequately detailed, and the scope, study area, methodology, basis of the assessment and baseline are broadly acceptable, the Council has a number of outstanding concerns. These are based upon the following policies: | | Noted |
| | Section 5.3.18 of The Overarching Policy Statement for Energy (EN-1) states that National Grid should demonstrate "...opportunities will be taken to enhance existing habitats and, where practicable, to create new habitats of value within the site landscaping proposals". | | National Grid recognise the policy driver for enhancements and those related to the Proposed Development are captured in the Enhancement Strategy (Document 7.13) which it is anticipated would be secured under a section 106 agreement; however it is not the function of this chapter. This policy only relates to creation of habitats of value 'within the site landscaping proposals'. All such opportunities have been taken and National Grid is therefore able to demonstrate compliance with the NPS. |
| | Strategic Policy PS 19 of the JLDP seek appropriate enhancement of biodiversity within developments in Gwynedd and Anglesey, including restoration and enhancement of ecological networks of natural habitats. Policy AMG-5 requires development to consider opportunities to create, improve and manage wildlife habitats and natural landscape including wildlife corridors, stepping stones, trees, hedges, woodlands and watercourses. | | Enhancement is not reported in this chapter, to avoid any confusion between enhancement and mitigation. The primary policy test is the NPS, which National Grid considers is met as confirmed above. |
| | The impact assessment is questioned for various receptors, including disagreement on sensitivity in some cases. | | This is addressed through the detailed comments below. |
| | Mitigation proposals are only outlined in the chapter and appear to rely on details in documents not yet provided which has hindered a detailed review of this topic. Those mitigation measures which are outlined appear generic and do not appear to address several issues. | | The level of detail provided on mitigation is considered appropriate for the purposes of making an assessment. The Biodiversity Mitigation Strategy (Document 7.7) is provided as part of the application, secured through Requirement 6 of the draft DCO (Document 2.1). |
| | The mitigation planting proposed at just four locations along the OHL route is disproportionately low in quantum and inadequate to alleviate predicted effects for various receptors. | | There are seven areas of planting which are focused close to where areas of woodland/trees are lost as far is practicable and are valuable for both landscape and ecology. Operational constraints limit the available locations. Two of these comprise the THH landscape mitigation, of which Braint in particular shows a beneficial increase in woodland planting for that area. |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | Avian collision risk has been dismissed as not significant; this is questionable and further discussion with NRW ornithologists is suggested. A real concern remains around Llyn Alaw (and potentially other locations) and mitigation measures including line marking and detailed monitoring proposals should be considered. | | Collision risk has been assessed and is therefore not dismissed; however no significant effects have been identified, which is why bird diverters are not considered necessary. ES Chapter 9 Ecology and Nature conservation (Document 5.9) text has been amended to provide more details where appropriate. |
| | Impacts to Gylched Covert and other woodland County Wildlife Sites, including ancient woodland, are also a concern as mitigation proposals are insufficiently detailed to support conclusions of no significant residual effects | | More information is included in the BMS (Document 7.7), and the habitat management plans will be developed post submission. The BMS includes the overarching principles of management sufficient to understand the effectiveness of mitigation. |
| | In IACC's view, National Grid's conclusions in respect of no net loss for biodiversity are unsupported at this stage. | | The loss of each habitat is reported under each habitat discussed, and an overall habitat loss calculation table has been included within section 9.5 of the ES Chapter 9 Ecology and Nature Conservation (Document 5.9). |
| | There is a complete lack of any enhancement measures for wildlife; if the project is to deliver a positive legacy, these should be clearly set out and captured via obligation under s.106 agreements. | | Enhancement opportunities are not included in the ES chapter, they are included in the Enhancement Strategy (Document 7.13) |
| | Enhancement Strategy (7.18) is referred to by National Grid but this has not been provided at this stage. | | A draft of the Enhancement Strategy (Document 7.13) was subsequently shared with IACC |
| Question 1: Does the information provide sufficient detail/clarity on National Grid's proposal/position? | Yes, in terms of description of development and Design Measures (DMs) mitigation built into the Project. Baseline data presentation appears to be an adequate reflection of survey work undertaken to date (though some bat data still missing). | | Noted Bat surveys are continuing in 2018 and the results will be presented in an addendum post submission. The summarised results from 2018 prior to report finalisation have been included where appropriate within chapter 9, Ecology and Nature Conservation (Document 5.9). This additional information it is not considered essential to the assessment. |
| | No, in terms of Mitigation Measures (MMs) provided for various receptors, where MMs proposed are either poorly described, rely on generic text with no specific details, where delivery is uncertain and indeed where MMs are absent entirely. The approach to avian collision risk is a particular concern; modelling was not expected but National Grid appears to have not adopted a precautionary | | More detail is included in the BMS (Document 7.7), however for most effects on habitats and species there is a reliance on the generic mitigation measures. There are some bespoke measures included where required. The amount of information provided is considered sufficient to conclude on significance for the receptors identified. |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | approach as recommended by guidance and has effectively ignored the issue entirely. | | <p>Further information is provided in the CEMP (Document 7.4) and BMS (Document 7.7).</p> <p>Collision has not been ignored. The assessment has considered collision risk for all relevant species. Additional information is discussed below and provided where appropriate within ES Chapter 9, Ecology and Nature Conservation (Document 5.9) and Appendix 9.15 Ornithological Assessment Report (Document 5.9.2.15). SNH guidance¹ recommends designing the route alongside any existing lines, which has been undertaken for the majority of the Proposed Development.</p> |
| | There are also various references to the Biodiversity Mitigation Plan (Document 7.9) which has not been provided; this is seen as a serious omission as we assume this will cover many of the concerns highlighted above, and will form part of the CEMP. Not providing it as part of this set of Batch reviews leaves significant gaps and cause for concern. | | <p>The BMS (Document 7.7) is a stand-alone document and does not form part of the CEMP (Document 7.4).</p> <p>It is also considered that sufficient information about mitigation is provided in ES Chapter 9, Ecology and Nature Conservation (Document 5.9) in order to understand how residual effects have been assessed, without the document becoming disproportionately large and complex.</p> |
| | Likewise, there is reference to the Enhancement Strategy (7.18) but this has also not been provided; therefore, none of the beneficial actions discussed in TWGs to date (OSPES, bat barn creation, Gylched Covert enhancement, GCN conservation contribution etc.) are detailed and therefore we assume no firm commitment is being made by National Grid. This would be seen as a departure from matters which were otherwise directing towards SOCG between National Grid and IACC. | | <p>OSPES is a term used on the Hinkley submission and refers to the 'offsite planting and enhancement scheme'. This is not a term used for the Proposed Development.</p> <p>The management of the Covert is mitigation not enhancement and has been referenced in the chapter, with more details provided in the Biodiversity Mitigation Strategy (Document 7.7).</p> <p>The Enhancement Strategy (Document 7.7) does not include a bat barn. The need for a bat barn was not discussed as a requirement in the thematic working groups, but was a suggestion made by a stakeholder.</p> |

¹ SNH (2016): Assessment and mitigation of impacts of power lines and guyed meteorological masts on birds. Version 1, July 2016

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| Question 2: Is the detail submitted adequate (ie, in order to make an assessment)? | Overall, the level of detail submitted is as expected and adequate to allow ecological assessment to take place. The baseline surveys followed agreed methods and study areas considered are appropriate for the project as promoted by National Grid. The baseline surveys reflect discussions to date via the ecology TWG. | | Noted. |
| | Despite NRW's request, we note that National Grid has not undertaken great crested newt population modelling, which is disappointing. This omission does not fundamentally undermine the assessment, but without it precautionary principles should have been adopted in detailed MMs; see below why there are concerns over this matter. | | GCN modelling was discussed with NRW and the reasons why this was not undertaken were discussed in the thematic working groups, it was made clear that a modelling approach would not be used. NRW have asked for additional specifications related to the proposed access track crossing points. These are discussed in the Biodiversity Mitigation Strategy (Document 7.7) and will be detailed in the 'ghost licence' application, once prepared. |
| | Some details are lacking in the cumulative impact assessment, notably around wind farm collision risk. This should be addressed ahead of final submission and shared with IACC. | | Collision risk modelling (CRM) undertaken in relation to the Rhyd-y-Groes Re-power project concluded collision mortality was probable, but not significant, for lapwing and curlew, but not relevant for any other species. The potential for a cumulative impact to arise was assessed as very low and therefore a Negligible (not significant) effect. The reasons for this were the spatial distribution and small number of recorded flights of both species adjacent to and/or across the Proposed Development during the over-winter and passage periods. Text has been reworded to clarify this within chapter 9, Ecology and Nature Conservation (Document 5.9). |
| | Some data are also missing for bat surveys, but it is assumed these will be available at some point and enough data are available for National Grid to make use of within their assessment. | | Bat surveys are continuing in 2018 and the results will be presented in an addendum post submission. The summarised results from 2018 prior to report finalisation have been included where appropriate within chapter 9, Ecology and Nature Conservation (Document 5.9). This additional information it is not considered essential to the assessment. |
| Question 3: Is there anything missing? What are the gaps? Do you have any views on the | A) There are various examples of where National Grid, using a methodology that does not follow CIEEM guidance (which is allowable, but adds confusion in places) predicting impacts that are lower than those that would be assessed when using the CIEEM guidance in isolation. | | Without specific examples of where the IACC consider this may apply it is not possible to provide a detailed response. However, it is not considered that the approach adopted predicts impacts of lower significance than CIEEM approach would as the approach used follows the latest CIEEM guidance of not using a matrix-type |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| impact assessment by National Grid? | | | approach and instead uses qualitative assessments when this is possible, together with reasoning and professional judgement. |
| | B) There is no sensitivity scale within the CIEEM guidelines as set out in Table 9.8 of the ecology chapter. National Grid uses sensitivity criteria in combination with the geographical valuation for each receptor (Table 9.6) and the severity of effect (Table 9.7). However, sensitivity is poorly defined for each receptor, with no discussion around the receptor's capacity to accommodate physical or chemical changes or influences as defined in Table 9.8. | | A review has been undertaken of all references to sensitivity to ensure that there is information provided to support the conclusion of sensitivity. |
| | C) For example, for red squirrel (9.6.67 onwards), the receptor is valued at County level, but sensitivity to disturbance, displacement and fragmentation effects is described as low (without detailed justification, discussing local distribution or fragility of the population). This combined with a low severity of effect is used to predict negligible effects. | | Additional explanation for receptor sensitivity has been included in the chapter where needed (e.g. in relation to water vole sensitivity to culverting). However, it should be noted that in the case of red squirrel, whilst potentially suitable habitat was identified in all Sections of the Order Limits, these were generally small and isolated and supported only low levels of red squirrel activity. An amendment has been made to split out different qualities of habitat. |
| | D) Under CIEEM, in the absence of mitigation, a significant effect at County level would be predicted. Assuming adequate mitigation measures were then set out, National Grid may have concluded no significant negative effects on the population, but the use of this method and lack of detailed explanation around sensitivity potentially underplays impact assessment. | | The ES follows a typical EIA approach whereby the significance of effects is not concluded in the absence of already committed mitigation, as it would be reporting an effect that would never occur. This approach is consistent with other chapters of the ES. |
| | Habitat fragmentation effects on great crested newt populations are assessed as low impact in 9.6.94 without supporting analysis and justification, such as if the remaining habitat areas would be sufficient to support the fragmented populations of this species. . | | Additional explanation has been included in the chapter where needed. |
| | Whilst discussed in the text, it would be helpful to have a clear table that shows habitat losses and gains to help understand overall impact and potential to deliver net positive effects for biodiversity. | | - Although details of the loss of each habitat are provided under each habitat assessed, an overall habitat loss calculation table has been included within section 9.5 of ES Chapter 9, Ecology and Nature Conservation (Document 5.9). |
| | The approach to great crested newt impact assessment is too basic and does not accord with the relevant mitigation guidance [English Nature (2001): Great crested newt mitigation guidelines] which highlights in Section 6.2.4 the potential severity of fragmentation effects on great crested newt metapopulations. The loss of dispersal possibilities from one pond may affect newt populations some | | Calculations of habitats affected within the GCN mitigation areas are not provided in ES Chapter 9 Ecology and Nature Conservation (Document 5.9), as these calculations will need to be updated as part of the addendum to include the survey results from 2018. However it is not considered that these additional calculations are |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | distance away. Fragmentation effects can also be severe even when there is only a very small loss of occupied great crested newt habitat. Even though no modelling is included, we would still expect a far clearer demonstration of foraging loss and barrier effects and confirmation of hibernacula presence (9.6.88 onwards). | | <p>necessary in order to understand the likely significant effects of the Proposed Development on great crested newt.</p> <p>Great crested newt mitigation guidelines section 6.2.4 discussed long term impacts of fragmentation in relation to physical barriers such as built land and softer barriers of habitats over which dispersal is limited. There would be no permanent barriers to GCN movement as GCN are only present within the OHL areas of the Proposed Development. The most affected habitat is improved grassland which is sub-optimal and less likely to be used by GCN, thereby a soft barrier in itself to some degree.</p> <p>During construction, the temporary barrier would be provided by the GCN mitigation fencing itself, but gated crossings would be included where appropriate, (location and form to be confirmed following discussions with NRW). These would be opened at night to allow movement across the access track.</p> <p>Fencing would be designed to ensure no isolation of ponds within the fenced area. Additional detail is provided in the BMS (Document 7.7) around the specification for the gated crossings and also additional information about how the locations of such crossings would be identified. Calculations have been made for the worst case scenario of affected habitat in fenced areas using the Order Limits within 250 m of each GCN pond/meta-population. Fencing would only be required around the working areas within these locations.</p> |
| | The impact assessment for bats is also too basic; more details are needed on the overall foraging habitat losses during construction, including clear figures that accompany the ES; fragmentation and loss of hedgerow sections should be more detailed. Likewise, the loss of edge habitat foraging around woodlands should be considered in more detail, notably around ancient woodland (9.6.38). Details of how topsoil stores will be seeded or managed for bats should be included where these persist in the landscape for long periods of time. Such detail is required to confirm with stated relevant guidance for bats [Collins, J. (ed.) (2016) Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd ed.). The Bat Conservation Trust, London.], notably Box 7, page 76 that states the evaluation should “...include data visualisation, analysis and interpretation of results. This section is particularly important because it links the | | <p>Hedgerow and tree loss are shown on the Trees and Hedgerows Potentially Affected Plans (Document 4.11) which have been referenced within the chapter. An overall habitat loss calculation table has been included within section 9.5 of ES Chapter 9, Ecology and Nature Conservation (Document 5.9), reference to which has been made within the bat assessment, indicating those most important to bats.</p> <p>The Chapter and BMS (Document 7.7) currently advise on the use of appropriate seeding and herbicides for storage of soils in relation to what is appropriate for the habitat type.</p> |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <i>results of the surveys with the impact assessment and subsequent recommendations.”</i> | | |
| | The overall approach to avian collision risk is questioned. Although modelling is not recommended, latest SNH guidance states: <i>“In recognition of the difficulty this presents (lack of accepted model) we recommend that emphasis is put on mitigation where surveys indicate potential conflicts”</i> | | Any potential risks have been stated within section 9 of ES Chapter 5.9, Ecology and Nature Conservation (Document 5.9) and associated Appendix 9.15 Ornithological Assessment Report (Document 5.9.2.15). This concludes that there are no significant effects for collision that would require mitigation. |
| | Guidance suggests several mitigation measures, including undergrounding and: “Installing line markers on earth wires and/or conductors as appropriate to reduce collision”. | | Any potential risks have been stated within section 9 of ES Chapter 5.9, Ecology and Nature Conservation (Document 5.9) and associated Appendix 9.15 Ornithological Assessment Report (Document 5.9.2.15). This concludes that there are no significant effects for collision that would require mitigation. |
| | For many species, despite a high percentage of flights recorded at collision height, National Grid regularly state risks are low. For example, for cormorant, and SPA feature species, although 92 flight lines were recorded, with 81.5% at collision height, in 9.7.52 we are told that numbers are low which indicates baseline risk of collision for the species is also low. We suggest further discussion with NRW on this approach. | | Any potential risks and the means by which such risks have been calculated have been stated within section 9 of ES chapter 5.9, Ecology and Nature Conservation (Document 5.9) and associated Appendix 9.15 Ornithological Assessment Report (Document 5.9.2.15). This concludes that there are no significant effects for collision that would require mitigation. |
| | Despite the avian baseline report being a substantial document, no key hotspots of flight activity are identified where mitigation measures may be appropriate. This is considered a weakness, as it would appear that the area around Rhosgoch and Lyn Alaw, the area around the Anglesey Valley Fens SAC and the area to the west of Maltreath Marsh southeast of Llangefni recorded flights of various species crossing the existing OHLs at collision height such as Fig 4.7 (whooper swan), Fig 4.9 (greylag goose), Fig 4.13 (mallard) etc. | | Any potential risks have been stated within section 9 of ES Chapter 5.9, Ecology and Nature Conservation (Document 5.9) and associated Appendix 9.15 Ornithological Assessment Report (Document 5.9.2.15). This concludes that there are no significant effects for collision that would require mitigation. |
| | M) The assessment of whooper swan collision risk around Llyn Alaw SSSI is particularly significant (9.7.2 onwards); despite flight activity near the existing line, and no monitoring data to support contention the existing lines are not an issue, National Grid concludes the new line will have no significant effect and no mitigation is needed. SNH guidance states: <i>i. “For susceptible birds, line sections that are routed through protected areas designated for the species, areas of substantial flight activity and/or those close to roost, breeding or main feeding areas should be considered for marking.</i> | | Any potential risks have been stated within section 9 of the ecology Chapter 5.9, Ecology and Nature Conservation (Document 5.9) and associated Appendix 9.15 Ornithological Assessment Report (Document 5.9.2.15). This concludes that there are no significant effects for collision that would require mitigation. |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p><i>What level of flight activity constitutes ‘substantial’ and how far from key areas marking needs to continue will depend on the species, site and the risk posed by the development involved.</i></p> <p><i>ii. This judgement should take into account the core foraging areas of the affected species, connectivity distances, susceptibility to collision, status of the population(s) and the potential population significance of collision mortality”.</i></p> | | |
| | N) No such consideration is given; and no monitoring proposals are presented. IACC consider that based on data presented to date, including key foraging areas in close proximity to the proposed OHL and flights across and close to the proposed alignment at collision height, coupled with the status of the population on Anglesey and as a key SSSI feature, National Grid should take a precautionary approach to mitigation and fit flight diverters. | | Any potential risks have been stated within section 9 of ES Chapter 5.9, Ecology and Nature Conservation (Document 5.9) and associated Appendix 9.15 Ornithological Assessment Report (Document 5.9.2.15). This concludes that there are no significant effects for collision that would require mitigation. |
| | The curlew impact assessment (9.7.112 onwards) does not adequately assess disturbance effects; this species is known to be highly sensitive to distances up to 800m [Pearce-Higgins, J. W. et al. (2009): The Distribution of Breeding Birds around Upland Wind Farms. Journal of Applied Ecology 2009, 46, 1323 – 1331] when nesting and we question the conclusion that effects would be of very low (9.7.116). Far clearer explanation of disturbance distances and species-specific control measures, including robust ornithology survey work in advance, should be included. | | Disturbance stated by Pearce-Higgins is relevant in the context of open habitats such as moorland and less applicable to the pastoral habitat as seen within the Order Limits and immediate surrounds which is why a distance of 400 m was agreed. Due to the paucity of curlew breeding records within 800 m of the Order Limits and the potential conflict this has now been amended to be a precautionary distance of 800 m and full details are provided in the ES Chapter 5.9, Ecology and Nature Conservation (Document 5.9) and associated Appendix 9.15 Ornithological Assessment Report (Document 5.9.2.15). |
| | Impact assessment on Gylched Covert (9.3.74 onwards), despite significant losses of an ancient woodland within a designated non-statutory Wildlife Site (irreplaceable habitat) this is only assessed to be of moderate sensitivity, with a low severity of impact for habitat loss overall. IACC does not agree with the assessment of effect; it under assesses the significance of this effect which ought to be of moderate severity of impact at least (using National Grid’s criteria set out in 4.6.17). | | Gylched Covert is not ancient woodland. It has been classified as partially Annex 1 Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> as represented by NVC W8e community, which includes ash, so has the potential to change substantially in coming years due to ash dieback caused by a fungus called <i>Hymenoscyphus fraxineus</i> and could move away from being Annex 1 as a result of losing the ash. As it is not ancient woodland it is considered to be replaceable. |
| | 9.7.149 refers to disturbance effects to breeding birds in Gylched Covert, and implies disturbance will only occur over the 1.1ha area directly impacted; this does not take account acoustic and visual disturbance effects that are likely to impact most/all of the woodland area. | | The chapter has been updated to include further details. Disturbance effects in Gylched Covert would be short-lived, affecting no more than one breeding season during each of the construction and decommissioning phases, with the impacts of maintenance likely to be highly localised and short-lived. Taking into account the proposed mitigation measures to control noise, visual disturbance, working |

Table 1: Isle of Anglesey County Council

| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
|--|---|----------------|--|
| | | | areas and light pollution and the likely duration and spatial scale of potential impacts, the severity of disturbance/displacement is considered Low. |
| | Red squirrel (9.6.57 onwards): If drays are indeed present, we question the conclusion that impacts are as low as presented. This is because woodland habitats in the landscape are fragmented and a decreasing resource and National Grid has not clarified what available habitats would be available for this species should displacement occur or drays be lost; furthermore areas of high potential near the work areas referred to in 9.6.65 are not identified. | | Only one confirmed drey was present and is located outside of the Order Limits. Other potential dreys were not confirmed to be active nor definitely dreys and have been identified for further surveys and pre-construction monitoring. Additional wording has been added to discuss the high potential habitats which have been avoided where appropriate. |
| | Regarding terrestrial invertebrates, the impact assessment is very simplistic and does not take account of habitat requirements or larval food plants for key species (9.6.125), for example the butterflies listed in 7.7.82 recorded during baseline surveys. Furthermore, the baseline report and chapter do not discuss IUCN threat status for species recorded, or indeed Red Data Book status. There is also no attempt to use analytical tools such as Pantheon [http://www.brc.ac.uk/pantheon/] to interrogate data and confirm key habitat areas for invertebrates. The focus on legal protection and S7 list in isolation is insufficient to effectively evaluate habitat value for invertebrates. | | Pantheon is not intended for use in Wales – the website states ‘At present, it is intended solely for use in England and the results may not fully reflect samples from the rest of the UK’ . Red data book status was included in the baseline report Appendix 9.14 Terrestrial Invertebrate Report (Document 5.9.2.14). Further discussion has been added. Habitat requirements are also discussed in the baseline report. |
| | Throughout the document, there are consistency errors and mistakes that add confusion; for example, whooper swan are stated to be of national value in 7.8.13; but only of county value in 9.7.7. Consequently, associated conclusions on impact should be checked throughout. | | Noted. Any such inconsistencies have been addressed. |
| Question 4: Are the mitigation proposals adequate and fit for purpose? | Overall, mitigation proposals outlined in the ES are generic and the typical minimum that would be expected for most effects; these lack detail, possibly relying in that provided within the Biodiversity Mitigation Plan (Document 7.9), but this has not been provided. Likewise, no enhancement measures are set out, but reference is made to the Enhancement Strategy (Document 7.18) but this is also missing. Significantly, none of the enhancements discussed in TWGs are mentioned within the chapter. IACC reserves its comments on mitigation relating to this chapter until those documents are provided. | | Enhancement opportunities are not included in the chapter, as they are not required to mitigate effects. Further details of mitigation are provided in the Biodiversity Mitigation Strategy (Document 7.7) and enhancements within the Enhancement Strategy (Document 7.13). |

Table 1: Isle of Anglesey County Council

| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
|---------------------------------|---|----------------|--|
| | 9.1.4 refers to transplanting botanical species of importance, but the type, location and quantum of these is not identified. That is essential to assess the adequacy of mitigation. | | No species have been identified that would require translocation. This measure was included to allow for circumstances should species needing translocation be found in the future. Reference is made within the Biodiversity Mitigation Strategy (Document 7.7). |
| | The chapter sets out a range of general mitigation measures relevant to ecological effects in Table 9.21. These are generally acceptable, but the following are questioned: | | Noted |
| | WE57 provides basic details for drainage controls around Cors Erddreiniog; we expect more detailed measures in a separate plan for this important site and also the Anglesey Valley Fens SAC in order to assess the adequacy of the mitigation proposed; | | The requirement to produce a more detailed plan, for approval by NRW, is to be secured via a DCO Requirement, and is not considered necessary at this stage. This approach has been discussed with NRW. |
| | BNC 28 refers to obvious mammal trails being kept clear with badger gates installed in fencing; how will these be determined and installed? Does this need to be covered within a badger licence? | | This would not be a licensable activity. The paths would be identified by the ECoW onsite, and they would determine if/where gates need to be installed. This approach is set out in the BMS (Document 7.7). |
| | BNC29, we question the statement that larger excavations will be protected with badger proof fencing; this is unlikely to be practical, digging in fencing to below 1m depth around temporary excavations each day? | | This wording has been amended accordingly. |
| | BNC210, why are winter works/vegetation removal in water courses barred in winter? And if this is the case, the next bullet point bars such works in sensitive months such as spawning? These measures would suggest working in water will not be possible for most/all of the year? | | This wording has been removed. |
| | In addition to CEMP measures, the chapter sets out basic mitigation measures in coloured boxes for each valued ecological receptor. Whilst these are welcomed, there is again a lack of detail, with location, timings and delivery responsibilities unclear. The following specific comments are made to which responses are required before IACC can confirm its comments on mitigation relating to this chapter: | | Each box is intended as a summary, and it is stated above that more detail can be found in the Biodiversity Mitigation Strategy (Document 7.7). |
| | Gylched Covert (9.3.74): Despite significant losses, mitigation measures are limited to commitments to tree replacement on a like for like basis or 'possible improvement'; this is considered inadequate and the ratio should be a minimum of 3:1 for replacement planting as per landscape chapter recommendations; | | The landscape chapter does not state 3:1 planting. Like for like planting is not intended to imply a 1:1 ratio, but replacement of areas as far as possible, with a higher than 1:1 ratio likely to be required. |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | furthermore, the DCO boundary just includes the existing WS, so the location of such replacement planting is unclear. Text suggests mitigation planting may not even be in this area. Proposals should be far bolder as loss of Annex 1 habitat is a major concern for this project. No details of a dedicated management and monitoring plan for this site are provided. | | <p>The area of mitigation planting for the covert is included in the Order Limits at the western side of the woodland.</p> <p>An outline of the proposed management plan is included in the Biodiversity Mitigation Strategy (Document 7.7); the full management plan will be provided post submission.</p> |
| | 9.4.20 refers to long-term habitat management of woodland areas including Gylched Covert; this is welcomed but what is long-term? Standard five year management aftercare period will be inadequate, based on permanent loss of habitat and proposed recreation / habitat improvement within the Wildlife Site. A minimum term of 15 years is requested given the value of ancient woodland as resource. | | Gylched covert is not ancient woodland. An outline of the management plan is included in the Biodiversity Mitigation Strategy (Document 7.7), however the full management plan will be provided post submission. |
| | 9.4.46 refers to avoiding use of weed killer on top soil; will this actually be used or will such practices be prohibited? | | This point has been clarified. More details are included in the Biodiversity Mitigation Strategy (Document 7.7). |
| | Hedgerows: Losses are totaled but it is unclear what replacement/ additional lengths will be provided. | | <p>Reinstatement plans are provided as Document 7.4.1.1 of the CEMP.</p> <p>The ecology chapter states the lengths of the worst case losses and that the losses would be replaced on completion of construction for temporarily affected hedgerows, with the exception of Tŷ Fodol, and gives details on the permanent areas. These replaced hedgerows would be of the same length but would be improved where the section to be lost is species poor or defunct as the replacement would be species rich and intact. Additional lengths of improvement of defunct hedgerows are considered to be enhancement measures and are set out in the Enhancement Strategy (Document 7.13). By their very nature these enhancements cannot be quantified at this stage and relate to improvement of existing hedgerows and not additional hedgerows unless these are requested by the landowner.</p> <p>The chapter also states that permanent hedgerows established as a result of landscape mitigation planting would be 1.84 km.</p> |
| | Bat mitigation measures (9.4.61): Concern is raised over the fact that hedgerow and woodland habitat losses may not be replaced in situ, leading to loss of useful foraging habitat and fragmentation. Loss of significant habitat area at | | With the exception of woodland and trees, habitat replacement would be in situ as it would be replaced on a like for like basis for temporarily affected areas and improved for permanently affected |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | Gylched Covert, including edges used for foraging, with no direct mitigation measures, is also a concern. Details of bat box numbers and location are not specified. No monitoring proposals are set out (this applies for most receptors subject to impact). Flexibility in the DCO could create greater impacts on sites such as Gylched Covert; 9.6.55 dismisses this, but a new alignment through the woodland, rather than on an edge could be significant. Overall bat mitigation measures need more details and IACC would welcome sight of a draft licence application for this species that should include such details. | | <p>areas as stated in section 9 of ES chapter 9, Ecology and Nature Conservation (Document 5.9). Woodland and trees are more difficult to replace in situ due to operational restrictions resulting from the OHL, but as stated are in close proximity where possible.</p> <p>Details of bat boxes and monitoring of these are given in the Biodiversity Mitigation Strategy (Document 7.7) and will be included in the management plan for the covert and the bat licence.</p> <p>Draft licences will be developed during the examination process along with the full management plan.</p> |
| | Red squirrel: There is significantly more activity than as shared with TWGs; generic mitigation is set out, but there is no mention of any licence requirements. It is our understanding that drey removal will need a licence from NRW as this would be an offense under the Wildlife and Countryside Act. This matter should be discussed with NRW and IACC would need reassurance that such a licence could be obtained for the conservation of the species. | | <p>There is currently no need for a licence for red squirrel, as no active dreys would be lost. Ongoing surveys will check that this remains the case. In the interim the Red Squirrels Trust Wales (RSTW) have confirmed that no licence currently exists but would be happy to assist in discussions with NRW on the creation of such a licence.</p> <p>NRW have stated that they are happy with the assessment.</p> |
| | 9.6.77, the council questions the merits of trying to maintain brown hare and polecat access through fencing across working areas; unlike badgers these animals will not follow set paths so frequently and could become entrapped. Accordingly, IACC does not consider this will be an effective mitigation measure. | | This reference has been removed from the chapter. The majority of fencing, other than in GCN mitigation areas, would be post and wire and therefore crossable by mammals. |
| | 9.6.21, why would hibernacula be created at Gylched Covert? Overall great crested newt mitigation measures need more details and IACC would welcome sight of a draft licence application for this species that should include such details. | | Hibernacula creation was generic text that has now been removed in relation to GCN although these features would be of benefit for this species should they move into this area. This comment references the wrong paragraph (9.6.91). |
| | 9.6.113, reptile mitigation: There is reference to moving animals to suitable remaining habitat, but this is unquantified and the extent and ownership is unknown, so it is hard to determine if habitat is of quality and carrying capacity to receive animals or be secure in the long-term. | | <p>Details are provided in the Biodiversity Mitigation Strategy (Document 7.7).</p> <p>The assessment has identified very small numbers of reptiles and habitat destruction would mostly be of sub-optimal habitats. As such there is limited risk as small numbers of animals would move from one sub-optimal habitat to one that is immediately adjacent. It is not considered necessary to have landowner permission to allow this, though it is likely that most movements would be within the Order</p> |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | Limits anyway. For example for the area near to Pentir an area has been included in the Schedule of Environmental Commitments (Document 7.4.2.1) to ensure it is free from construction works and landscape mitigation planting in the form of woodland. |
| | 9.6.128: States that a programme of works would include for appropriate timing of clearance of vegetation for invertebrates. What exactly is this? | | This measure was not required to address any potentially significant effects and so has been removed from the chapter. |
| | 9.6.154: We question how practical checking watercourse crossing locations for fish spawning habitat will be ahead of construction and its presence forcing redesign of works; such habitats are unlikely to change between now and construction? | | A comment has been added to clarify that where pre-construction surveys are noted, these can occur between pre-submission to immediately prior to works on site, as appropriate. As such, these surveys would inform detailed design. |
| | Mitigation measures for birds in general, and species including whooper swan in particular, dismiss collision risk as described above. No consideration of marking lines in key areas such as Llyn Alaw is given; no monitoring proposals are included. This is not considered adequate. | | Collision risk has been assessed and is therefore not dismissed; however no significant effects have been identified, therefore bird diverters are not considered necessary. ES Chapter 9 Ecology and Nature Conservation (Document 5.9) text has been amended to provide more details where appropriate. |
| | 9.7.12: More details on the watching brief mitigation for whooper swan area needed, including methodology for assessing disturbance responses and distances. | | The text has been amended in section 9 of ES Chapter 9, Ecology and Nature Conservation (Document 5.9), and more detail given within the BMS (Document 7.7). |
| | 9.7.5: The ES appears to be based on an assumption that disturbance of whooper swans away from the area during construction will have some form of reduced collision risk effect. This is a flawed argument, given collision risk is not seen as an issue and measures are presented to actually avoid disturbance of this species during construction. 11.2.2 states that the OHL has been designed to maximise visibility to birds - how has this been proven? There appears to be an assumption that no line marking is needed now as none was when the old line was installed. This is not the case as modern standards should apply. | | The text has been amended in section 9 of chapter 9, Ecology and Nature Conservation (Document 5.9), and more detail given within the BMS (Document 7.7). The line has been designed to be in close parallel to the existing line, but this is not primarily for reasons of collision risk, so text has been updated. Whilst there is no evidence that the existing line is having an effect, reference to line marking not being necessary as it was not on the existing line has been removed from the chapter. This does not alter the assessment that line marking of the OHL is not justified. |
| | Noting that no works are proposed below MHWS, in the event vessels are required for any activities during construction they should be subject to strict biosecurity protocols to avoid the spread of invasive alien marine species, | | Due to the potential requirement for use of a vessel within the Menai Strait, appropriate biosecurity measures have been added to the CEMP (Document 7.4) and BMS (Document 7.7). |

| Table 1: Isle of Anglesey County Council | | | | | |
|---|--|--------------|---------|----------------|--|
| Consultee and Section Reference | Comment | | | Reference Code | How the comment has been addressed |
| | including the invasive sea squirt <i>Didemnum vexillum</i> known to occur in Holyhead Harbour, as detailed in the HRA for the marine GI works. | | | | |
| | <p>X) A cumulative assessment is provided within the chapter which is welcomed. However, the following comments are made:</p> <ul style="list-style-type: none"> o There are numerous examples of where the chapter states that a no significant effect from the project alongside another no significant effect on the same receptor from another project cannot create a significant cumulative impact; this is not the case and each such effect should be looked at in detail to consider if together they could raise the overall level of impact to a level that could be significant, for example for otter (10.3.27). o 10.3.35 states that there will be no overlap with site clearance for Wylfa that will start in January 2018 and continue to April 2019. This should be modified given project delays already experienced which we assume will lead to overlap. o 10.3.56 Rhyd-y-Groes Re-Power: There is no discussion on cumulative collision risk for avian species using Llyn Alaw, including whooper swan. | | | | <p>The cumulative assessment takes this approach when one or other of the effects alone is negligible, as it is not considered likely that negligible effects could generate a cumulative effect, given that they are 'barely perceptible'. This approach is not taken where it is simply 'not significant' as it is recognised that there is a potential for two minor effects to have a significant cumulative effect.</p> <p>The cumulative effects section has been updated with the latest published information for the Wylfa Newydd Power Station.</p> <p>See previous comments in relation to Rhyd-y-Groes Re-Power. Note: number of flights and individuals recorded passing through the collision risk area for Rhyd-y-Groes Re-power did not identify whooper swan and therefore this species was not included in the assessment.</p> |
| Question 5: Are there any changes or inconsistencies in the project detail following on from s42 or any Thematic Working Group? | The Ecology TWG has been informed that significant mitigation planting would apply around Gylched Covert but this has not been included on the works plans or accompanying ES figures. As per landscape responses, only 0.7ha of tree planting is proposed in limited locations which is inadequate in the Council's assessment. | | | | <p>The previously discussed planting area at Gylched Covert was based on the Preliminary Environmental Information Report issued for the Stage 3 Consultation.</p> <p>The proposed planting area for the ES was shown on Figure 7.13, which was included as part of the documents shared in Batch 2.</p> <p>The 0.7 ha quoted in the landscape responses does not take into account the planting around the THH/CSECs and Pentir Substation, nor the re-instatement.</p> |
| | No mention of using building to be acquired by NG as part of CP process for the benefits of bats has been included. | | | | This is not required to mitigate effects on bats and therefore is not included within Chapter 9, Ecology and Nature Conservation (Document 5.9) nor the BMS (Document 7.7). The Enhancement Strategy (Document 7.7) as submitted does not include a bat barn. |
| Please see the following table which includes an extract from Annex C | Annex C (S42) issue no. | Resolved Y/N | Comment | | All points have been discussed above except for: |

| Table 1: Isle of Anglesey County Council | | | | | |
|--|---------|---|---|----------------|--|
| Consultee and Section Reference | Comment | | | Reference Code | How the comment has been addressed |
| response to PEIR at Section 42: | 85 | Y | Policy and legislation updated | | <p>130 – This point is not mentioned in the main comments; however it is considered that the assessment information provided is sufficient. Some updates have been made.</p> <p>133 – Requirements for spoil storage are summarised in section 9, of ES Chapter 9 Ecology and Nature Conservation (Document 5.9), with more details included within the CEMP (Document 7.4), the BMS (Document 7.7) and the Soil Management Plan (Document 7.10). Spoil waste is not included in the ES as it will be taken off site to appropriately licensed disposal or recycling facilities. The effects of transportation have been assessed.</p> |
| | 86 | N | Robust collision risk assessment not provided | | |
| | 87 | N | Justification for net gain not provided | | |
| | 88 | Y | Methodology updated | | |
| | 89 | Y | No issue with wording in ES on fragmentation | | |
| | 90 | Y | Methodology updated | | |
| | 91 | Y | Clarified in baseline report | | |
| | 92 | Y | Bat baseline report describes survey effort | | |
| | 93 | Y | 2016 late CBC survey data augmented with early visits in 2017. | | |
| | 94 | Y | Addressed in ES presentation of data | | |
| | 95 | Y | Metapopulations adequately described in baseline report for great crested newts | | |
| | 96 | N | ES and baseline report still lack clear figures showing bat foraging habitats by valuation. | | |
| | 97 | Y | Clarified in baseline report | | |
| | 98 | Y | Bat baseline report describes tree survey effort | | |
| | 99 | Y | Section 7 species adequately described. | | |
| | 100 | Y | Addressed in ES impacts section | | |

| Table 1: Isle of Anglesey County Council | | | | | | |
|--|-----|---------|---|--|----------------|------------------------------------|
| Consultee and Section Reference | | Comment | | | Reference Code | How the comment has been addressed |
| | 101 | N | Loss of hibernacula / places of shelter for newts and reptiles not clearly identified in ES. | | | |
| | 102 | Y | Not relevant to ES | | | |
| | 103 | N | Disagreement on impacts to whooper swan | | | |
| | 104 | Y | Avian valuation acceptable in ES | | | |
| | 105 | Y | Not relevant to ES; beneficial claims not emphasised | | | |
| | 106 | Y | Not relevant to ES | | | |
| | 107 | Y | Cemlyn Bay impacts considered | | | |
| | 108 | N | Details still lacking around mitigation for SAC drainage and ecological MMs. | | | |
| | 109 | Y | Addressed adequately within impact assessment | | | |
| | 110 | Y | Addressed adequately within impact assessment | | | |
| | 111 | Y | Otter impact quantified adequately | | | |
| | 112 | N | Concerns remain over reptile habitat loss and associated mitigation | | | |
| | 113 | Y | Addressed adequately within impact assessment | | | |
| | 114 | N | Full ecological details of reinstatement (will these be in the Biodiversity Mitigation Plan?) still queried | | | |
| | 115 | Y | Addressed adequately within impact assessment | | | |
| | 116 | Y | Addressed in ES impacts section | | | |

| Table 1: Isle of Anglesey County Council | | | | | | |
|--|---------|---|---|----------------|------------------------------------|--|
| Consultee and Section Reference | Comment | | | Reference Code | How the comment has been addressed | |
| | 117 | Y | Addressed in ES impacts section | | | |
| | 118 | Y | Methodology clarified to explain impact assessment | | | |
| | 119 | Y | Methodology clarified to explain impact assessment | | | |
| | 120 | Y | Accept valuation of the feature | | | |
| | 121 | Y | Sectioning of route removed | | | |
| | 122 | Y | Methodology clarified to explain impact assessment | | | |
| | 123 | Y | Evaluation of AW loss now acceptable. | | | |
| | 124 | Y | Addressed in ES impacts section | | | |
| | 125 | Y | Addressed in ES impacts section | | | |
| | 126 | | Noise issues in HRA | | | |
| | 127 | Y | Habitat loss of this grassland type quantified | | | |
| | 128 | N | Clear quantitative calculations of habitat recreation and provision and bold tree planting are not presented. | | | |
| | 129 | Y | Addressed in HRA | | | |
| | 130 | N | More detailed assessment on wildlife effects around the THHs should be provided, notably for piling and other tunnel shaft creation activities. | | | |
| | 131 | Y | Menai Strait effects adequately described. | | | |
| | 132 | Y | Third crossing included in cumulative assessment. | | | |

| Table 1: Isle of Anglesey County Council | | | | | |
|--|--|---|--|----------------|---|
| Consultee and Section Reference | Comment | | | Reference Code | How the comment has been addressed |
| | 133 | N | Impacts of spoil not considered in ecology chapter. Clarity needed that no effects are predicted and if so, why. | | |
| Volume 5, Chapter 10: Historic Environment | | | | | |
| Overall conclusion of factual assessment | IACC considers that National Grid have not undertaken or sought to undertake, the amount of strip and map that it considers is required. This point has been made, repeatedly, in the TWGs. | | | | The scope of the proposed archaeological recording has been developed in light of the results of the desk study and of subsequent survey work. It has also taken account of consultee comments. This scope is set out in the Archaeological Strategy (Document 7.8) and is considered to be a reasonable approach to the recording of archaeological remains disturbed by construction, reflecting the risk of encountering previously unknown archaeological remains. |
| | In respect of the Desk Study, it is concerning that a walkover survey of the route was only ever undertaken along sections A – D. It is also concerning that the walkover survey for sections A – D did not identify any new potential archaeological sites. Gwynedd Archaeological Planning Service (GAPS) undertook a very limited walkover of part of the route with the archaeological consultant (03/08/2017) and identified a number of new sites within section A, one of which had also been identified on the magnetometer survey but was clearly visible as an earthwork site on the ground. Consequently, IACC considers that the methodology used by National Grid to be flawed. | | | | Walkover in E and F has been undertaken, though the Desk Study Report (Document 5.10.2.1) had not been updated to reflect this at the time the draft was issued. The Desk Study Report has now been updated. Additional sites were identified during the walkover survey and are reported in the Desk Study Report. |
| | IACC remains concerned that sections E – F were excluded from the walkover due to the ‘scale’ of the section. | | | | Walkover in E and F has been undertaken, though the Desk Study Report (Document 5.10.2.1) had not been updated to reflect this. The Desk Study Report has now been updated. |
| | In respect of the Geophysical Survey, some of the anomalies which have been interpreted as geological in origin have the potential to be archaeological in origin. Ground-truthing anomalies can only be achieved by intrusive archaeological work, such as trial excavation. Once again the downstream effects of restrictions on baseline understanding (in this case a result of weaknesses in the technology) mean that a robust strategy is needed to ensure that unexpected discoveries during construction works are adequately recorded, or preserved if possible. In the first instance, National Grid should address the | | | | Trial trenching has been undertaken on some of the anomalies identified in the geophysical survey, though it is acknowledged that there is potential for previously unidentified archaeological remains to be encountered during construction. The ES chapter (Document 5.10) and Archaeological Strategy (Document 7.8) have been amended to more fully reflect the potential for further archaeological remains to be encountered during construction The scope of the proposed archaeological recording is set out in the Archaeological Strategy (Document 7.8) and is considered to be a |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | baseline understanding to the satisfaction of the relevant local planning authorities and GAPS. | | reasonable approach to the recording of archaeological remains which will be disturbed by construction, reflecting the risk of encountering previously unknown archaeological remains. |
| | In respect of the ASIDOHL, the details are adequate to make an assessment of the potential impacts, however visualisations (photomontage) are required from Coed Nant Y Garth Standing Stone (Scheduled Monument Number Cn375). This would help to illustrate the extent of indirect impacts as discussed within the ASIDOHL and would also help inform the setting study. | | A photomontage has been produced and is included for submission within the ASIDOHL Report (Document 5.10.2.3). |
| | IACC disagrees with the following three paragraphs in Chapter 10: 4.5.1 Adopting a sampling strategy inevitably involves leaving some areas unsurveyed, and access restrictions have also prevented survey from some limited areas. However, the geophysical survey that was completed covered an extensive area and has proved to be a reliable indicator for the presence of sub-surface archaeological remains. | | The geophysical survey has proved successful in that it has identified the sub-surface archaeological remains of the type that a survey of this sort could be expected to, whilst acknowledging geophysical survey is generally not suitable for identifying some remains, such as smaller pits and post-holes. The ES Chapter (Document 5.10) has been amended to clarify this. |
| | This statement fails to acknowledge the fact that the sampling strategy employed for trial trenching in this case was very low. When combined with the effect of access restrictions, it leaves significant risk that as yet unidentified archaeological remains will be discovered during the course of the mitigation, as has been the case on other very recent excavations on Anglesey. This information, including potentially nationally significant finds, was shared with National Grid in the TWGs . As such, this reinforces the need for a robust archaeological mitigation strategy which is developed with an expectation that extensive archaeological remains are likely to be encountered. | | The scope of the proposed archaeological recording has been developed in light of the results of the desk study and of subsequent survey work. It has also taken account of consultee comments. This scope is set out in the Archaeological Strategy (Document 7.8) and is considered to be a reasonable approach to the recording of archaeological remains which will be disturbed by construction, reflecting the risk of encountering previously unknown archaeological remains. |
| | Whilst the geophysical survey did cover a much more extensive area, it cannot be stated that it has 'proved to be a reliable indicator. The geophysical survey results do identify numerous anomalies along the length of the scheme and some of these can be readily interpreted as archaeological sites (see section 7.4). However, a number of additional (generally discrete pits / post holes or similar) archaeological features were identified during the limited intrusive trial trenching. These were not apparent as anomalies on the geophysical survey and this illustrates the high potential for further - yet to be identified - archaeological remains to be discovered during the mitigation. <i>5.2.5 Where this flexibility could therefore result in a significant effect as a result of a pylon being re-located and placed so as to disturb an area of known archaeological importance, then a</i> | | The geophysical survey has proved successful in that it has identified the sub-surface archaeological remains of the type that a survey of this sort could be expected to, whilst acknowledging geophysical survey is generally not suitable for identifying some remains, such as smaller pits and post-holes. The ES Chapter (Document 5.10) has been amended to clarify this. |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <i>commitment has been made to exclude the area as a potential pylon location. This measure also applies to access tracks. All such exclusions have been included in the Schedule of Environmental Commitments, which forms Appendix 1 (Document 7.4.2.1) of the Construction Environmental Management Plan (CEMP) (Document 7.4). Outside of these exclusion areas, the use of flexibility when locating a pylon or access track may result in a minor increase or decrease in the level of effect, but is unlikely to make a substantial difference to the significance of effects. This is identified, where appropriate, in the assessment.</i> | | |
| | The areas of 'known archaeological importance' referred to here have not been 'ground-truthed' and should therefore be considered areas of archaeological potential. They mainly represent linear anomalies and enclosures identified through geophysical survey which can only ever be considered a fraction of the whole archaeological resource. These anomalies cannot be interpreted with great confidence without further investigation. Their nature, character and extents are not fully understood and it is not possible to identify them as being of 'known importance'. Avoiding groundworks in proximity of an anomaly assumes that all of the significant remains or deposits associated with an enclosure lie within it. This can lead to direct impacts on extra-mural features or deposits. Furthermore, many of the more discrete features which might be discovered along the length of the scheme would not be identified using geophysical survey and therefore cannot be avoided in this way. Discrete features are not necessarily less significant and some of the most important archaeological sites in the area are of this type. 5.2.6 <i>One of the reasons for including flexibility in the design is actually to allow the avoidance of previously unknown archaeology, should an asset be uncovered during site preparation.</i> | | <p>The ES Chapter (Document 5.10) has been amended to reflect the comments regarding the areas described as being of 'known archaeological importance', though it is noted that trial trenching has been used to provide further information on a number of features initially identified by geophysical survey.</p> <p>The ES chapter has been amended to more fully reflect the potential for further archaeological remains to be encountered during construction.</p> <p>National Grid would only seek to relocate access tracks or other elements of the Proposed Development in the event that significant archaeology is encountered and it is apparent that relocating construction can effectively preserve the archaeology.</p> |
| | Avoidance of unknown archaeology uncovered during site preparation is unlikely to be practical or favourable to the archaeology. It should be assumed that all archaeology encountered as part of archaeological mitigation during site preparation would be subject to preservation by record rather than in situ. Whilst, in principle, in situ preservation is considered the preferred option this should only be considered where the nature, character and extent of remains is properly understood, their depositional / conservation requirements can be guaranteed and long term preservation of and access to the remains can be assured. | | National Grid would only seek to relocate access tracks or other elements of the Proposed Development in the event that significant archaeology is encountered and it is apparent that relocating construction can effectively preserve the archaeology. |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| Question 1: Does the information provide sufficient detail/clarity on National Grid's proposal/position? | Whilst the baseline examines the known archaeology and is well-supported by the Desk Based Assessment in understanding the significance of known assets, there is little consideration of archaeological potential. This is reflected in the Archaeological Strategy as well as in the mitigation measures articulated in the Historic Environment Chapter. | | The ES chapter (Document 5.10) has been amended to more fully reflect the potential for further archaeological remains to be encountered during construction. |
| Question 2: Is the detail submitted adequate (ie, in order to make an assessment)? | The detail submitted is adequate in terms of the known archaeological resource but does not provide adequate information on the archaeological potential of the order limits to inform the mitigation as set out in this document and the Archaeological Strategy (Document 7.10) – see below in mitigation. | | The ES chapter (Document 5.10) has been amended to more fully reflect the potential for further archaeological remains to be encountered during construction. |
| Question 3: Is there anything missing? What are the gaps? Do you have any views on the impact assessment by National Grid? | A deposit model or similar document (perhaps this forms part of the trial trenching report?) which sets out how the areas of demonstrably lesser importance have been defined. | | The Archaeological Strategy (Document 7.8) has been amended to provide more information on the archaeological potential and on how the proposed scope of the archaeological recording has been defined. |
| | Further details of public outreach aspirations / proposals. | | The Archaeological Strategy (Document 7.8) has been amended to provide more information on public outreach proposals during the archaeological recording. |
| | Proposals for offsetting and compensatory measures for historic assets with setting impacts. (see below for detail) | | Proposals for offsetting and compensatory measures are set out in the Enhancement Strategy (Document 7.13). |
| Question 4: Are the mitigation proposals adequate and fit for purpose? | The extent to which the archaeological mitigation strategy has been informed by the development of a detailed deposit model is unclear. The Historic Environment Chapter provides a detailed assessment of assets subject to direct effects and an assessment of those subject to setting impacts. However, it provides limited detail as to how areas of high, medium and low archaeological potential have been identified and as such how the Archaeological Strategy has defined areas of identified archaeological interest and, more importantly those of 'demonstrably lesser archaeological importance' (see paragraph 9.3.4 of the Historic Environment Chapter 5.10 and the Archaeological Strategy Document 7.10). | | The Archaeological Strategy (Document 7.8) has been amended to provide more information on the archaeological potential and on how the proposed scope of the archaeological recording has been defined. |
| | Table 10.12 of Historic Environment Chapter 5.10. AC62 provision of public outreach. This mitigation measure is one to be welcomed and is certainly one positively pursued and promoted by IACC and GAPS. However, this measure is mentioned very infrequently and requires much greater detail / commitment, | | The Archaeological Strategy (Document 7.8) has been amended to provide more information on public outreach proposals during the archaeological recording. |

| Table 1: Isle of Anglesey County Council | | | |
|---|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | including resources to be secured through a s.106 agreement for dedicated officer resource or equivalent. 9.4.110 appears to suggest that some outreach might be possible as part of the work on the Roman Road but further opportunities need to be explored. | | National Grid is in discussion with IACC regarding resourcing. |
| | There are no suggested measures to offset the impacts on setting (as set out on 9.5), nor to enhance any of the historic assets affected (to varying degrees) by the proposals. Welsh Government guidance on Managing the Setting of Historic Assets in Wales (May 2017) suggests that both offsetting and enhancement measures should be considered appropriate in relation to this type of impact stating that, 'The introduction of offsetting or compensatory proposals, such as public access or interpretation panels, will not reduce the impact of the development within the setting of the historic asset and should not be accepted as mitigation. But, proposals for offsetting should nevertheless be presented to the decision-making authority so that it can weigh the benefits of the scheme, including the compensatory measures, against the impact of the development on the historic asset and its setting.' Both EN1 and Planning Policy Wales highlight the need to 'preserve and enhance' the historic environment and this guidance should be used to achieve that objective. | | Proposals for offsetting and compensatory measures are set out in the Enhancement Strategy (Document 7.13). |
| Question 5: Are there any changes or inconsistencies in the project detail following on from s42 or any Thematic Working Group? | No but see comments above | | N/A |
| Document 5.10.2.1 – Desk Study | The archaeological desk study covers the scope of work required for such a document and utilises the data sources that would be expected of such a document. | | Noted |
| | The details are adequate to make an assessment of the potential impacts and inform a staged programme of archaeological work. | | Noted |
| | The desk based archaeological work should be used as part of a staged programme of works to inform the development of a deposit model. As such, there is no mitigation detailed within this report. Each section does include a 'summary of potential archaeological interest' within that area. However, in general this appears to be a summary of the known archaeological resource | | The ES chapter (Document 5.10) has been amended to more fully reflect the potential for further archaeological remains to be encountered during construction. |

| Table 1: Isle of Anglesey County Council | | | |
|---|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | rather than an assessment of the potential (i.e. yet to be discovered) archaeological resource. | | The Archaeological Strategy (Document 7.8) has been amended to provide more information on the archaeological potential and on how the proposed scope of the archaeological recording has been defined. |
| Document 5.10.2.2 Geophysical Survey Report | The geophysical survey results are good and the survey corridor reflects an area which helps to characterise the archaeological resource within the area of impact of the proposals. | | Noted |
| | The geophysical survey results are good with numerous anomalies having been identified, but see comment above in the overall factual conclusion on this chapter in respect of possible misinterpretation of some anomalies. | | Noted and as per comments above |
| | There is little discussion of the potential limitations of geophysical survey as a technique. The magnetometer survey only ever allows certain types of feature to be identified. | | The ES Chapter (Document 5.10) has been amended to clarify that geophysical survey is generally not suitable for identifying some remains, such as smaller pits and post-holes, whilst reflecting that it has proved successful in that it has identified the sub-surface archaeological remains of the type that a survey of this sort could be expected to. |
| | The geophysical survey should be used as part of a staged programme of works to inform the development of a deposit model. As such, there is no mitigation detailed within this report. | | Noted. The Geophysical Survey Report (Document 5.10.2.2) is a baseline report only. Proposals for archaeological recording are set out in the Archaeological Strategy (Document 7.8). |
| Document 5.10.2.3 ASIDOL | The ASIDOHL study generally meets the ASIDOHL2 guidelines. The calculations appear to be accurate. However, the ASIDOHL does not discuss mitigation or positive benefits, improvements, amelioration in terms of conservation, improved access, and increasing opportunities for study or research in stage 5. This is an acknowledged part of the ASIDOHL process as set out in the ASIDOHL2 guidance. | | The ASIDOHL Report (Document 5.10.2.3) has been amended to note positive benefits, though these are recognized as being limited. |
| | Comments in respect of the standing stone can be found in the overall factual conclusion on this chapter | | As per comments above |
| Volume 5, Chapter 11 Geology, Hydrogeology and Ground Conditions | | | |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| Overall Conclusion of Factual Assessment | The Draft Soils, Geology and Ground Conditions chapter of the Environmental Statement, along with Chapter 3, provides sufficient detail on National Grid's proposals at this time. Some areas require updating to include additional information which National Grid have already sourced, but for which National Grid acknowledge have not yet been included in the current draft. It would appear that National Grid have taken on board many of the comments from the Scoping Opinion and S42 and this is welcomed. National Grid summarise appropriate construction mitigation in the Chapter based on the OWMP and CEMP, although additional mitigation may be required following the results of project specific ground investigation, particularly related to ground contamination, mining and piled foundations. | | Chapter 11, Geology, Hydrogeology and Ground Conditions (Document 5.11) has been updated to reflect the Proposed Development as applied for. Noted. It is acknowledged that additional mitigation following risk assessment on completion of the ground investigation may be required. The framework for determining and implementing this is set out under section 6.3 of the Construction Environmental Management Plan (Documents 7.4) . |
| Question 1: Does the information provide sufficient detail/clarity on National Grid's proposal/position? | A) The Draft Geology, Hydrogeology and Ground Conditions chapter of the Environmental Statement provides a reasonable degree of detail with respect to National Grid's proposals for the scheme. It is expected that further detail for the scheme will be provided in earlier introductory chapters in the Environmental Statement (typically Chapter 3 - Description of the Proposed Development). On this basis, the information contained in the document is considered to provide sufficient detail on National Grid's proposals, subject to the provision of further detail in an updated Chapter 3 – Description of the Proposed Development. IACC reserves the right to amend this position upon receipt of further detail. | | Chapter 3, Description of the Proposed Development (Document 5.3) has been updated to reflect the Proposed Development as applied for. |
| | B) The new Private Water Supply Regulations came into effect in November 2017 but document 5.11.2.6 only makes reference to the old regulations. | | Chapter 11, Geology, Hydrogeology and Ground Conditions (Document 5.11) has been updated to reflect the new regulations. |
| | C) The new regulations require new supplies to be sampled before being brought back into use | | Noted. |
| | D) IACC suggest that a comprehensive water sampling and water level monitoring strategy should be prepared and implemented prior to, during and after the construction works take place. | | Section 9 mitigation and residual effects of Chapter 11, Geology, Hydrogeology and Ground Conditions (Document 5.11) and the Construction Environmental Management Plan (Document 7.4) confirm that a monitoring strategy will be prepared and implemented. |
| Question 2: Is the detail submitted adequate (ie, | A) The Draft Geology, Hydrogeology and Ground Conditions chapter of the Environmental Statement provides a detailed overview of the assessment methodology, the basis of the assessment, and the sources | | Noted. |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| in order to make an assessment)? | of information and baseline condition as indicated in Section 7. | | |
| | B) The detail is generally adequate to make an assessment of the potential effects attributable to the proposed scheme and to provide general guidance on mitigation measures. Ground investigations have been undertaken for the onshore areas between the Braint and Ty Fodol THH/CSEC to provide more detailed information of geology and groundwater conditions, with some investigation focussing on potential soil and groundwater contamination. National Grid acknowledge that further intrusive investigation will be required at specific points of interest along the cable route in order to provide information to undertake a more robust and thorough assessment. Subject to the assessment being updated to include the results of those further investigation, and those results being reviewed by IACC, the detail provided is expected to be adequate. | | <p>Additional ground investigation information has been included, from a recent ground investigation along parts of the OHL, in Chapter 11, Geology, Hydrogeology and Ground Conditions (Document 5.11).</p> <p>Information from an upcoming ground investigation within the Menai Straits to support the detailed design of the tunnel will be available during examination. Further ground investigation along the OHL will be undertaken post consent.</p> <p>Based on the ground information from ground investigations undertaken to date, the existing OHL, and there is no evidence of there being extensive areas of highly contaminated land; it is not considered that further ground investigation is required at this stage to make an assessment of the potential effects.</p> |
| Question 3: Is there anything missing? What are the gaps? Do you have any views on the impact assessment by National Grid? | A) It is noted from National Grid's list of Batch 3 caveats (dated 9th February 2018) that the design and construction information is still evolving in respect of ongoing discussions with land owners and information received. National Grid indicate that some design and construction information may vary before submission, although it is further acknowledged by National Grid that the changes are likely to be small. Any changes to the assessment of significant effects must be fully reported in the final ES submission. | | Chapter 11, Geology, Hydrogeology and Ground Conditions (Document 5.11) has been updated to reflect the Proposed Development as applied for. |
| | B) National Grid indicate that they are still working through comments on the first batch of documents and therefore the current document (which is the subject of this review) has yet to been updated to reflect these comments. | | Chapter 11, Geology, Hydrogeology and Ground Conditions (Document 5.11) has been updated to reflect the comments on the first batch of documents. |
| | C) It is indicated by National Grid that the ES Chapter has not yet been updated to include all of the baseline data which may have been collected. It would be useful to understand what data has been obtained since the last revision and which has not yet been included. However, it is clear that National Grid has addressed, within the Chapter, many of the issues raised as part of the Stage 3 consultation and which are listed in Table 11.3. | | Chapter 11, Geology, Hydrogeology and Ground Conditions (Document 5.11) has been updated to reflect all of the baseline data collected. |
| | D) Section 4.6 – Assumptions and Limitations to the Methodology (to | | Section 4.6 of Chapter 11, Geology, Hydrogeology and Ground |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | determine the baseline ground and groundwater conditions, how they could be affected by the proposed development (the impacts) and how significant the effects of these impacts are likely to be) indicates that assumptions have been made with respect to the depth of foundations for pylons and the length of dewatering for the placement of shallow foundations. It is not clear what these assumptions are and where they can be found within the document. This matter should be confirmed in the Environmental Statement. | | Conditions (Document 5.11) has been updated. |
| | E) It is acknowledged, in the introduction to Section 7, that not every element of the baseline environment is assessed in Section 8 (Potential Effects) and Section 9 (Mitigation and Residual Effects). It would be useful for National Grid to provide a more thorough explanation in this respect to allow full consideration as to the appropriateness of this approach and to ensure that all relevant information will be included within the Environmental Statement. | | Chapter 11, Geology, Hydrogeology and Ground Conditions (Document 5.11) has been updated to reflect the Proposed Development as applied for and all relevant information has been included. |
| | F) Table 11.14 lists 45 historic boreholes which have been obtained from British Geological Survey (BGS) archives and which relate to the existing 400kV line and other areas within the Order Limits. For clarity on their position and their relation to elements of the proposed works, it would be useful if they were marked on the geological figures. In addition, clarity should be provided as to the depth to the base of the rock strata listed in Table 11.14. It is likely that the base of the borehole is indicated rather than the base of the rock, although this should be confirmed. | | The location of the boreholes have been included on Figure 11.2, Superficial Geology (Document 5.11.1.2) . In Chapter 11, Geology, Hydrogeology and Ground Conditions (Document 5.11) the table detailing the Historic BGS Boreholes has been updated to include a note that each strata is recorded to the bottom of that strata as shown on the logs. However, it has been assumed that the depth to bottom of the strata, for the strata described as rock, is the base of the borehole and therefore the depth of rock is unproven. |
| | G) It is noted that data from the land agent for surveyed private water supplies is still outstanding. Clarification is required as to the impact of this outstanding information on the final outcome of the Private Water Supply Risk Assessment presented in Appendix 11.6. | | Chapter 11, Geology, Hydrogeology and Ground Conditions (Document 5.11) and Appendix 11.6 (Document 5.11.2.6) has been updated to include for the private water supplies identified by the land agents. |
| | H) Document 5.11.2.6, Appendix 11.6: The new Private Water Supply Regulations came into effect in November 2017 but this document only makes reference to the previous regulations. As set out above, IACC would suggest that that a comprehensive water sampling and water level monitoring strategy should be prepared and implemented prior to, during and after the construction works take place. | | Chapter 11, Geology, Hydrogeology and Ground Conditions (Document 5.11) has been updated to reflect the new Regulations. Section 9 mitigation and residual effects of Chapter 11, Geology, Hydrogeology and Ground Conditions (Document 5.11) and the Construction Environmental Management Plan (Document 7.4) confirm that a monitoring strategy will be prepared and |

| Table 1: Isle of Anglesey County Council | | | |
|---|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | implemented. |
| | l) The new regulations also require new supplies to be sampled before being brought back into use. | | Noted. |
| Question 4: Are the mitigation proposals adequate and fit for purpose? | Generally, the mitigation measures indicated in the CEMP and OWMP consist of good site practice and management. The potential effects and the mitigation due to construction activity are included in table 11.28. However, additional mitigation in relation to the effects of land contamination, coal workings, piled foundations etc. may be required following further intrusive ground investigation and associated risk assessment which is acknowledged by National Grid as a requirement going forward. Where risks are confirmed, a mitigation strategy would need to be implemented through appropriate design and / or remedial works which would need to be agreed with IACC prior to being implement. The means of securing this strategy would be by a Requirement in the DCO. | | It is acknowledged that additional mitigation following risk assessment on completion of the ground investigation may be required. The framework for determining and implementing this is set out under section 6.3 of the Construction Environmental Management Plan (Document 7.4). |
| Question 5: Are there any changes or inconsistencies in the project detail following on from s42 or any Thematic Working Group? | The current draft of the Soils, Geology and Ground Conditions chapter of the Environmental Statement has benefitted from the Section 42 comments and responses. Further project detail has been provided by National Grid and the sources of information have been expanded. This has allowed further and more detailed assessment work to have been undertaken to understand the potential effects of the construction works, and the results of the assessments reported in the Chapter. Tables 11.2 and 11.3 of the chapter outline the issues which have been raised in the Scoping Opinion and Stage 3 Consultation with the response by National Grid and how these issues have been addressed in the Environmental Statement. | | Noted |
| | Most of the issues raised by IACC at section 42 have been addressed by National Grid and additional information has been presented in the draft Soils, Geology and Ground Conditions chapter of the Environmental Statement. Some of these items have been included in the SoCG. | | Noted |
| | However, outstanding areas include: <ul style="list-style-type: none"> Presentation and assessment of all information into the document. It is acknowledged by National Grid that not all information accessed and obtained as part of the study has been incorporated into the latest draft. In addition, the scheme details are not yet finalised and therefore details of the | | Chapter 11, Geology, Hydrogeology and Ground Conditions (Document 5.11) has been updated to reflect the Proposed Development as applied for and all the baseline information collected. Chapter 11, Geology, Hydrogeology and Ground Conditions (Document 5.11) and Appendix 11.6 (Document 5.11.2.6) has been updated to include for all the current information obtained for private |

| Table 1: Isle of Anglesey County Council | | | |
|---|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>assessments and mitigation required are likely to change, although changes are likely to be small.</p> <ul style="list-style-type: none"> Information related to private water supplies is not yet complete. In addition, from the information presented, it is unclear if National Grid have engaged with the IACC Environmental Health Team regarding the approach to the study, the assessment methodology and the resource implications. | | <p>water supplies. Part of this information was obtained from the IACC Environmental Health Team. No comments have been raised on the assessment methodology presented in either the PEIR or draft Chapter 11, Geology, Hydrogeology and Ground Conditions (Document 5.11).</p> |
| Volume 5, Chapter 12: Water Quality, Resources and Flood Risk | | | |
| 5.12.2.5 Water Framework Directive Assessment Chapter 12 – Appendix 5 | <p>a) Paragraph 5.6.4 states that:</p> <p>“The EU designated bathing waters that have a potential connection to the Proposed Development are:</p> <ul style="list-style-type: none"> Cemaes Bay at the north of Anglesey into which the Afon Wygyr discharges is currently assessed as Sufficient.” | | As below |
| | <p>b) IACC is concerned that National Grid has incorrectly identified the designation, as the bathing water in Cemaes Bay was designated ‘poor’ during the 2017 bathing season and will also be the same during 2018. This is a matter of <u>grave concern</u> to IACC and the local community of Llanbadrig which relies upon tourism. Indeed, IACC fundamentally disagrees with paragraph 3.6.7, as the Acclimatize study (see below) has demonstrated that the rivers and streams draining into the bay have an adverse impact on bathing water and this is partly due to poor water dispersion within the bay.</p> <p>We suggest that National Grid contact Aberystwyth University to gain a better understanding of this issue.</p> | | <p>The status of bathing waters has been corrected in Chapter 12 (Document 5.12) and in the WFD Assessment (Document 5.12.2.5).</p> <p>The discussion of cross-water body effects relating to Cemaes Bay in the WFD Assessment has been updated to reflect that any residual effects at Cemaes Bay would be negligible, based on the conclusions for the upstream water bodies.</p> |
| | <p>c) In 2016, IACC established a Task Group (comprising of representatives from IACC, Llanbadrig Community Council, NRW and DCWW) in an attempt to resolve the issue. The Task Group was fortunate to gain the support of the Acclimatize Project (supported by European Regional Development Fund) run by Aberystwyth University who undertook a comprehensive bathing water sampling programme during the 2017 bathing water season in order to develop a detailed</p> | | As above |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | prediction model. Investigatory work by all parties has concluded that the streams entering the bay, which serve a large agricultural area, appear to be the source of the faecal organisms causing the bathing water to fail. This is combined with poor dispersion characteristics within the bay, which is in fact a bay within a bay. For further information about this matter, National Grid should contact either [<i>Contact details redacted</i>]. | | |
| | <p>d) Table 6.1 - It is imperative that the work does not increase the sediment loading within the streams running into Cemaes Bathing Water.</p> <p>This should be secured by National Grid committing to appropriate section 106 financial contributions towards the running of the Water Quality Prediction Model for Cemaes bathing water during the summer season e.g. staff costs to run model and the upkeep of the met station and river flow gauge during the period they are constructing the OHL in the Cemaes catchment.</p> | | As it has been concluded that there would not be a significant effect on Cemaes Bay associated with the Proposed Development, no such mitigation is proposed. |
| | <p>e) It is advisable that work within this area is undertaken outside the bathing season and precautionary measures are taken to ensure that sediment does not enter streams / rivers draining into the bay.</p> <p>Also, care must be taken to ensure that livestock fences are kept intact to prevent access to watercourses. NRW should be approached for further advice on this matter.</p> | | <p>As it has been concluded that there would no effect on Cemaes Bay associated with the Proposed Development, restrictions relating to the bathing season are not considered necessary.</p> <p>The CEMP (Document 7.4) incorporates a range of measures to manage sediment and reduce the risk of sediment loading to any stream or river. The CEMP (Document 7.4) also includes measures for livestock fencing around working areas.</p> <p>The WFD Assessment for the Afon Wygyr has been revised to present the proposed WFD measures for the water body: livestock fencing required for the construction of the Proposed Development will be inspected and repaired as necessary in accordance with measure GP84 in the CEMP (Document 7.4).</p> |
| | f) Definition of 'sensitivity' of receptors. This approach has been improved to an extent since the Council's concern raised at s42, however it is requested that the process for defining sensitivity (and thus significance) is clarified further, for example by clarifying where risk is related to internal or external flooding. | | Chapter 12 (Document 5.12) has been revised to further explain the approach to defining and assessing impacts. It also clarifies that in relation to flood risk, effects are required to be no greater than negligible in order to be compliant with TAN15 and NPS EN-1. |
| | g) Table 12.8 'Classification of Effects'. The Council has previously suggested(at informal consultation and s42 consultation) that if a receptor has a medium sensitivity and would be subject to a medium magnitude of change, that | | As above. |

| Table 1: Isle of Anglesey County Council | | | |
|---|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | this should be assessed as being a moderate (S) significance of effect, scoped into future assessments. The assessment framework, where a receptor has a medium sensitivity and is subject to a medium magnitude of change, is assessed as being a minor significance of effect, which would result in such effects not being assessed as significant in EIA terms. Under this rationale, activity resulting in "moderate damage" to commercial premises (considered to be of medium sensitivity to flooding) would not be considered a significant effect. This clearly very much depends on what is meant by "moderate damage" - hence the need for better definition, but this methodology could result in significant effects being screened out as it stands. | | |
| Volume 5, Chapter 13: Traffic and Transport | | | |
| Overall Conclusion of Factual Assessment | Overall, it is not considered that the draft Traffic and Transport chapter provides sufficient detail on National Grid's proposals; it is noted in the earlier sections that clarifications on mitigation are required in the form of the PRoWMP to allow the Council to understand the implications of the proposals on the Public Rights of Way network. In addition, the assumed Sensitivity of Highway Links for Assessment will require reviewing and amending by National Grid. | | PROW Management Plan was not included in the batches of documents, as it was issued to IACC in August 2017. IACC made no comment. This was discussed with IACC at a meeting in March 2018, when the PRoW Officer expressed general satisfaction with the document. Sensitivity is picked up in the comments below. |
| | One of IACC's main concerns is in respect of Links Ref 14 (NCR8) and 16 (A4080) designated as Contingency Routes should Link 15 (Lon Pont Rhonwy) be unavailable. National Grid have assessed both links against the specific effects (i.e. severance, driver delay, pedestrian delay, etc.), with the assessment confirming potential high residual magnitude/major significance - as would be expected considering the potential significant increase in HGV traffic. | | Response below |
| | However, National Grid seems to disregard this. For example with Link 14 (NCR8), it is stated that this is a "contingency route for tunnelling elements only, so unlikely to be fully used for the level assessed. As tunnel activity construction traffic would be restricted to using Link Ref 15, with Link 14 only used as a contingency route, the volume of traffic on Link Ref 14 would typically be limited to activity associated with two pylons on the OHL". This does not therefore comprise an adequate assessment of the likely significant impacts National Grid are identifying within their own ES. | | Contingency routes have been assessed for effect of peak construction traffic using them as per comment B above. The preferred route for accessing the Braint THH is via Link 15. Alternative routes have been identified in the unlikely event the preferred link is unavailable. |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | <p>The effects that might be realised if the contingency routes are required to be used during the peak of construction activity has been assessed and documented.</p> <p>The likelihood of effects being realised is considered when reporting the residual effects.</p> |
| | IACC considers that these contingency routes have every potential of being used, especially considering the sensitivity of the Lon Pont Rhonwy bridge. Consequently, IACC considers that mitigation measures must be identified and proposed within the document. This would ensure that approved mitigation measures can be implemented as soon as practicable. | | Network Rail is the asset owners of the bridge and has been consulted with plans to use Link 15 as the primary construction access to the Braint THH. Network Rail has suggested that one-way traffic be implemented, which is included in the Outline CTMP (Document 7.5). |
| Question 1: Does the information provide sufficient detail/clarity on National Grid's proposal/position? | The Draft Traffic and Transport chapter provides a detailed overview on the approach undertaken to assess the impacts of the proposed development. It includes additional information not included as part of the S.42, such as assessments relating to specific effects such as severance, driver delay, pedestrian delay, pedestrian amenity etc. | | Noted |
| | However, IACC has identified significant concerns in respect of Lon Pont Rhonwy and accordingly, the information contained in the document is not considered to provide sufficient detail on National Grid's proposals. | | National Grid has met with IACC highways twice since the comments were made and trust that sufficient detail as to our proposals for accessing Braint THH have been provided during these meetings, and in the submission documents. |
| Question 2: Is the detail submitted adequate (ie, in order to make an assessment)? | The draft Traffic and Transport chapter provides a detailed overview of the methodology and the sources of information used to undertake the assessments. Whilst the scope of the study and assessment criteria used enable the Council to understand and provide a formal response to the impacts of the Proposed Development, further detail will be required to inform the cumulative impacts (Section 10), and these are discussed later in this response. | | Noted. The cumulative effects section has been added to the submission in line with the general approach to all topics in the ES. |
| | It is also requested that prior to the submission of the ES, mitigation proposed as part of the supporting Public Right of Way Management Plan (PRoWMP) document is shared with the Council to ensure meaningful engagement. | | As per comments above |
| Question 3: Is there anything missing? What are the gaps? Do you | A summary of missing information is provided below. Where National Grid has acknowledged further work is required, these have also been provided for completeness: | | Noted |

| Table 1: Isle of Anglesey County Council | | | |
|---|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| have any views on the impact assessment by National Grid? | Table 13.1 provides a summary of the associated supporting documents to the draft Traffic and Transport chapter. The draft Transport Assessment has been provided as part of Batch 2, and this is welcomed. The PRowMP has yet to be provided. It is expected that this document will be provided as part of the Batch 3 – 4 submission. | | The draft PRowMP has been issued twice. It was issued in July 2017 in Draft, and no comments were received. As such it was not issued as part of the Batch 2 draft submission documents. When IACC queried this the document was reissued again in March 2018. |
| | Table 13.6 provides a summary of data collection from organisations. It is noted that CrashMap data has been included in the assessments. It is recommended that this analysis is undertaken using PIA data provided by the Council North Wales Police. | | At the scoping stage it was stated that National Grid would use Crashmap if unable to get hold of PIA data. National Grid has requested this data from IACC but this has not yet been provided. In March 2018 North Wales Police stated that they would be able to provide this PIA data. This data has not been provided to National Grid and as a result it has not been possible to incorporate into the submission. |
| | Section 4 and Table 13.56 provide an overview of the consideration of Wylfa Newydd Nuclear Power Station. National Grid has acknowledged the information relating to Wylfa Newydd Nuclear Power Station is based on an October 2017 submission date, and a construction start of 2019. It is expected that this PAC3 information will be included in the draft Transport Assessment and will be updated as part of the DCO submission. It is also expected that this will form part of the cumulative effects assessments provided in Section 10. National Grid will be required to demonstrate that they have obtained the latest evidence from Horizon Nuclear Power for as part of their DCO submission. | | Noted, this consideration of the Horizon Nuclear Power submission is included within Section 10 of the Traffic and Transport ES Chapter. |
| | Section 7, table 13.16, provides baseline condition data. HGV traffic data for Links ref 22 to 35 are not provided. | | Section 7, table 13.16 has been updated. National Grid is not proposing to route HGVs on Links ref 27, 28, 30, 33 -35 which is why the data has not been provided. |
| | <ul style="list-style-type: none"> Table 13.17 allocates Sensitivity of Highway Links for Assessment. The IACC disagrees with a number of assumed link sensitivity due to the presence of primary schools, children's play area and nursing home. The table and subsequent assessment should be amended by including the following:- Link Ref 1: Ysgol Rhyd Y Llan – High Link Ref 4: Rhosmeirch play area – High Link Ref 9: St Tysilio nursing home - Medium | | National Grid has reviewed and amended our Methodology, clarifying our approach which, in summary, allocates a sensitivity to changes in traffic flow to a Link based on the number and type of built environment indicators present. Where highly sensitive receptors are noted on a link with a medium or low sensitive receptor, a supplementary assessment to determine residual effects has been undertaken. National Grid do not consider the Menai Science Park to be a receptor with Medium sensitivity to changes in traffic flows, given it is a new facility located adjacent to the A55. |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <ul style="list-style-type: none"> Link Ref 12: Menai Science Park – Medium Link Ref 22: Ysgol Y Graig and Coleg Menai – High (IACC previously requested an alternative route should be considered) Link Ref 23: Ysgol Gynradd Cemaes - High Link Ref 25: Llanfechell children's play area – High | | |
| | Section 7.5 provides a summary of the PRow sensitivity at each link. For completeness, and as a general rule for the document as a whole, it would be helpful if the document was updated to provide a brief overview as to how the sensitivity classification, magnitude of impacts and residual effects (in Section9) have been identified. Whilst it is acknowledged that the criteria is provided earlier in the document, it would be useful to understand how some of the outputs are identified. This could be done through additional commentary supporting this section of the document. | | Noted and included in the ES chapter. |
| | It is noted that there are measures to reduce issues relating to severance caused by an increase in traffic at areas within the scope of assessment. Para 9.4.19 states that Link Ref 15, Pont Ronwy Link between A5 and Access F1 is proposed to be closed to general traffic for the duration of the construction. The Council understand that this road closure will result in non-NWCP traffic re-routing elsewhere on the road network. It is not clear if National Grid has fully assessed these impacts on the section of the A5 between Link 15 at Pont Ronwy and the Toll House junction connecting Links 16 and 17. The impacts of an increase on traffic at this location should be included using all the assessments criteria contained in the draft traffic and transport chapter. | | This is assessed in the Transport Assessment. |
| | National Grid propose to prohibit the public from using Pont Rhonwy as a local community walking route. This requires assessing and suitable mitigation identified and implemented in agreement with the IACC. | | This link is not a designated PRow although it is noted by IACC in discussions that it is recreationally used. |
| | It is noted that there are a number of mitigation measures which are provided in the PRowMP which has yet be provided. As such, no formal comments have been provided on the adequacy of the proposals. | | As above |
| | Intra and Inter project cumulative impact assessments are require review to include additional information, i.e. Wylfa Newydd traffic volumes | | Noted and addressed in the ES Chapter. |
| | | | |

| Table 1: Isle of Anglesey County Council | | | |
|---|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| Question 4: Are the mitigation proposals adequate and fit for purpose? | A review has been undertaken of the following at this stage, Section 9 – Mitigation and Residual Effects, and IACC has the following comments: | | |
| | Table 13.23 provides an overview of the general CEMP mitigation measures. Code GP11 makes reference to the construction working hours. It is requested that all documents make reference to mitigation measures proposed in the Transport Assessment, for consistency i.e. limiting construction movements through certain junctions, outside of the highway and/or school peak hours. | | The Transport Assessment (Document 5.13.2.1) and the OCTMP (Document 7.5) both note that in order to mitigate some localised effects it may be necessary to restrict certain movements in certain locations at certain times of the day or year. |
| | It is noted that there are a number of mitigation measures included in the PRowMP. This is yet to be provided, and as such, no comments can be provided on the adequacy of this information. It is expected that this document is to be provided as part of the Batch 3 – 4 submission | | Comments on the PRow management plan as above. |
| | It is acknowledged that, based on the assessments in the draft Transport Assessment, the increase in accidents equates to increases in the accident rate. It is noted that mitigation measures are proposed at Link 14 (Llanddaniel Road/NCN8). IoACC request that these measures include consideration of cyclists at this location in order to ensure the safe overtaking is possible. | | This has been discussed with IACC and National Grid welcome their suggestion of a possible diversion route. Provision has been made in the DCO Plans and Schedules for a temporary diversion of this route in the event that HGVs are required to use this route. |
| | Links Ref 14 and 15 are used as contingency routes should Link Ref 15 be unavailable. The assessment identifies potential high residual magnitude/major significance, however National Grid states these are “Contingency Routes for tunnelling elements only, so unlikely to be fully used for the level assessed”. As these contingency routes could be potentially used as per the assessment, mitigation measures should still be identified and proposed. This would ensure that approved mitigation measures could be implemented prior to the use of the contingency routes. | | As above |
| | In relation to the contingency routes identified within the assessment, thresholds would need to be agreed with the IACC on the level of usage/ additional traffic volumes on each route. | | National Grid is not proposing to include thresholds on contingency routes. The CTMP outlines preferred routes which construction traffic is expected to use unless unavailable. |
| Question 5: Are there any changes or inconsistencies in the project detail following on | The draft Traffic and Transport chapter provides a detailed summary of the assessment work to allow the Council to understand the potential effects arising from the traffic associated with construction, operation, maintenance and decommissioning of the Proposed Development. Section 3.2 (and Table 13.3) of the document outlines the issues that were raised in the Scoping Opinion and | | Noted. |

| Table 1: Isle of Anglesey County Council | | | |
|---|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| from s42 or any Thematic Working Group? | how these have been addressed in the ES. Where appropriate these changes have been incorporated into the draft chapter, which is welcomed | | |
| Document 5.13.2.1 Transport Assessment | | | |
| Overall Conclusion of Factual Assessment | Overall, it is considered that the draft Transport Assessment does not provide sufficient detail on National Grid's proposals. Further work and clarifications are required to allow the Council to provide a holistic view on the transport proposals and subsequent mitigation proposals. A list of the key areas are provided below: <ul style="list-style-type: none"> Queue surveys at all junctions included in the highway assessments Methodology used to derive HGV and LGV traffic Confirmation that there will be a dedicated council Traffic Safety and Control officer. | | <p>Queue length surveys for junctions in the study area have been included within the Transport Assessment.</p> <p>Methodology used to derive HGV and LGV has been clarified in subsequent discussions with IACC and has been revised in the TA (Document 5.13.2.1) submission.</p> <p>Discussions with IACC on the need for a Transport Management Supervisor are ongoing and the OCTMP includes for a Traffic Control and Safety Officer and a Transport Review Group.</p> |
| | <p>The Council expects that the following information will be provided in Batches 3 – 4 of the draft documents:</p> <ul style="list-style-type: none"> Abnormal Indivisible Load Report Public Right of Way Management Pan Construction Traffic Route Hazard Risk Register Construction Traffic Management Plan | | <p>An AIL report has been submitted as Annex B to the Outline CTMP (Document 7.5). A draft PRow has been circulated to IACC for comment and has been updated and revised within the submission. The Outline CTMP (Document 7.5) has been circulated to IACC for comment and has been updated and revised within the submission. This includes, as an Annex, a Construction Traffic Hazard Risk Register.</p> |
| | The updates to the Transport Assessment following the Council's earlier comments are welcomed. | | Noted |
| Q1 Does the information provide sufficient detail/clarity on National Grid's proposal/position? | The Draft Transport Assessment provides a detailed overview on the approach undertaken to assess the impacts of the proposed development. It includes additional information not included as part of the S.42, such as assessments related to highway safety, junction assessments and mitigation proposals that allow a more detailed understanding of the proposal. However, in light of the outstanding information, the document is not considered to provide sufficient detail on National Grid's proposals. | | National Grid has met with IACC highways twice since the comments were made and trust that sufficient detail has been provided during these meetings, and in the submission documents. |

| Table 1: Isle of Anglesey County Council | | | |
|---|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | The comments provided in this response highlight areas for further clarification and additional information to support the Transport Assessment that will be submitted as part of the DCO. | | |
| Q2 Is the detail submitted adequate (ie, in order to make an assessment)? | There are a number of areas where further information is required in order to ensure a robust assessment of the transportation impacts is adequately assessed. A summary of the key points is provided below. | | |
| | Table 4.1 and Section 7 states that the highway safety analysis has been undertaken using outputs from the CrashMap website. The report acknowledges that, in the absence of Personal Injury Accident (PIA) data requested from the local authorities, the description provided within the CrashMap accident reports has allowed a provisional opinion based on professional judgment to be drawn, suggesting the factors that may have contributed to the collision. The IACC acknowledges that such data has not been provided to date, however are aware that North Wales Police have recently made this data available to National Grid. Following this, It is recommended that this analysis is undertaken using PIA data. provided by the Council. | | At the scoping stage it was stated that National Grid would use Crashmap if unable to obtain PIA data. This data was requested from IACC but has not yet been provided. In March 2018 North Wales Police stated that they would be able to provide this PIA data. This data has not been provided to National Grid and as a result it has not been possible to incorporate into the submission. |
| | Table 4.5 demonstrates that a number of classified turning counts have been used in order to inform the capacity assessments. It states that a total of 28no MCTC surveys and 5no queue length surveys at junctions on Anglesey and Gwynedd were counted. It's not clear why queue surveys weren't carried out across all junctions included in the junction assessments and as requested in the Council's response to the TA Scoping dated 30 November 2016. Queue surveys are required at all junctions to ensure the base models accurately reflect the existing conditions at each junction included in the assessment. | | Queue length surveys for junctions in the study area have been included within the Transport Assessment. |
| | Para 8.2.4 provides a summary of the staff/worker numbers. Reference is made to the peak numbers of workers across the Proposed Development which is anticipated to be 508 full time equivalents (FTE). It's not clear how this has been calculated and at what point of the construction programme. A tabulated build-up of workers throughout the construction programme would be welcomed. | | The generation of jobs during the construction of the Proposed Development is described in section 9.10 of ES Chapter 17, Socio-Economics (Document 5.17), which is supported by Appendix 3 Workforce Analysis Assumptions Log (Document 5.17.2.3). |
| | Para 8.2.5 states that traffic generation profiles presented in the subsequent sub sections account for the movement of staff to each primary temporary access points via LGVs/HGVs. It's not clear how these trips have been assigned to the network. Section 12.9 refers to limited parking provision at construction areas. | | Noted. The revised TA (Document 5.13.2.1) for submission provides further detail on this. |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | Section 9 provides a summary of the junction assessment results. This information is welcomed. Junction models have been provided by Aecom to allow the Council to undertake a review of the models. As previously noted, queue surveys have not been used to validate the models. It's strongly recommended that each model is validated using queue surveys in order to ensure that the impacts of the Proposed Development are robustly assessed. On this basis, the suitability of the models cannot be agreed at this stage. | | Queue length surveys for junctions in the study area have been included within the Transport Assessment. |
| Q3. Is there anything missing? What are the gaps? Do you have any views on the impact assessment by National Grid? | Section 5.8 relates to Highway Structures, however fails to state that a programme for surveying/assessing existing highway structures is to be agreed with the IACC. | | Noted. Now included |
| | Section 8.2 provides an overview of the traffic likely to be generated during the construction peak. This information is welcomed and allows the Council to understand the level of traffic likely to be generated by the Proposed Development. Further information on the assumptions and methodology used to derive the peak traffic movements for all vehicles is requested to allow the Council to understand this process. | | Methodology used to derive HGV and LGV has been clarified in subsequent discussions with IACC and has been revised in the TA (Document 5.13.2.1) submission. |
| | Para 8.2.4 provides a summary of the staff/worker numbers. Reference is made to the peak numbers of workers across the Proposed Development which is anticipated to be 508 full time equivalents (FTE). It's not clear how this has been calculated and at what point of the construction programme. A tabulated build-up of workers throughout the construction programme would be welcomed. | | The generation of jobs during the construction of the Proposed Development is described in section 9.10 of ES Chapter 17, Socio-Economics (Document 5.17), which is supported by Appendix 3 Workforce Analysis Assumptions Log (Document 5.17.2.3). |
| | Para 8.2.5 states that traffic generation profiles presented in the subsequent sub sections account for the movement of staff to each primary temporary access points via LGVs/HGVs. It's not clear how these trips have been assigned to the network. Section 12.9 refers to limited parking provision at construction areas. | | Noted. The revised TA (Document 5.13.2.1) for submission provides further detail on this. |
| Question 3: Is there anything missing? What are the gaps? Do you have any views on the impact assessment by National Grid? | A summary of missing information is provided below. Where National Grid has acknowledged further work is required, these have also been provided for completeness. | | Noted |
| | Section 5.4 relates to the Construction Traffic Route Hazard Risk Register (CHRHRR) and has information contained in the Construction Traffic Management Plan (CTMP). This information was not included as part of the | | The Outline CTMP (Document 7.5) has been circulated to IACC for comment and has been updated and revised within the submission. |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | CTMP submitted in November 2017, and as such, no comments can be provided on the adequacy of this information. It is expected that this will be provided prior to National Grid's DCO submission to ensure adequacy of engagement with the Council. | | This includes, as an Annex, a Construction Traffic Hazard Risk Register. |
| | Section 5.8 relates to Highway Structures, however fails to state that a programme for surveying/assessing existing highway structures is to be agreed with the IACC. | | Noted. Now included |
| | Section 6.2 relates to Construction Route Groups, however further information is required on the anticipated number of HGV vehicles that will utilise LGV routes for Site Investigation purposes. | | The low levels of activity associated with Site Investigations have been explained at Thematic Group meetings. |
| | Section 8.9 provides an overview of the committed developments included in the assessments. National Grid has acknowledged the information relating to Wylfa Newydd Nuclear Power Station is based on an October 2017 submission date, and a construction start of 2019. It is expected that this PAC3 information included in the draft Transport Assessment will be updated as part of the DCO application. | | The submission documents consider the DCO submission for Wylfa Newydd. |
| | A review of Figure 13.4 Traffic Count Locations has indicated that not all data has been provided in Annex C (e.g. ATC 15). All survey outputs are expected to be provided as part of the DCO application. | | Traffic count data is summarised within the submission and this data can be made available to the Council upon request, as per the junction modelling referred to above. Due to the volume of raw data it is considered impractical to include all raw data, which is not fundamental to the understanding of the assessment. |
| | It is noted that not all the junctions requested as part of the IACC's (dated October 2017) and Arup's (dated November 2016) correspondence have been included in the assessments. For example, the Ty'n Ffrwd Junction (B5111), adjacent proposed temporary access B9, has been excluded. Further clarifications and evidence on why this has been removed from the scope of assessments is requested. The IACC requires such junctions stated within previous correspondence to be adequately assessed as part of the TA. | | This junction has been added to the Transport Assessment. |
| | There has been no assessment undertaken of Britannia Bridge to understand the impacts of the Proposed Development at this location. It is anticipated that there are likely to be impacts relating to journey times and congestion at this location, and it is essential that the Transport Assessment fully illustrates what these impacts are likely to be. Significant impacts arising from the Proposed | | This has been further considered in the Transport Assessment (Document 5.13.2.1). |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | Development and other developments on Anglesey are required to be included as part of the assessments undertaken to understand the cumulative impacts. | | |
| | The AIL Report (document 7.7.2.1) has yet to be provided. This must be provided in order to enable IACC to undertake a review of the information in this document. | | An AIL report has been submitted as Annex B to the Outline CTMP (Document 7.5). |
| Question 4: Are the mitigation proposals adequate and fit for purpose? | <p>It is understood that mitigation will come in the form of a number of measures. On that basis, a review has been undertaken of the following sections:</p> <ul style="list-style-type: none"> Section 10 – Mitigation Section 12 – Framework Travel Plan Annex L – Physical Mitigation Measures | | |
| Section 10 Mitigation | This section of the Draft Transport Assessment provides an overview of the proposed mitigation measures. It is noted that accident analysis undertaken as part of the COBA, indicated that a higher average accident rate is forecast at Link Ref 1: A5025. National Grid has determined that the Online and Offline works proposed as part of the Wylfa Newydd development will address any impacts of increased traffic volumes and enhance highway safety. For this statement to apply, National Grid will need to demonstrate that both Online and Offline works will be completed prior to using this route. | | Noted. |
| | Measures to reduce the impacts of construction traffic movements have been proposed by the Proposed Development to address issues regarding highway safety. These include restricting traffic movements to a contingency route and other measures proposed in the Construction Route Hazard Risk Register (CRHRR). It is considered that measures will be identified and implemented on a site-specific basis, and as such, until the precise measures cannot be fully commented upon at this stage in the absence of the CRHRR. | | The Outline CTMP (Document 7.5) has been circulated to IACC for comment and has been updated and revised within the submission. This includes, as an Annex, a Construction Traffic Hazard Risk Register. |
| | Temporary Traffic Regulation Orders (TTROs) are proposed as part of the mitigation proposals. It is recommended that these are agreed with the Council at the earliest opportunity. National Grid should consider producing a 'TTRO principle note' which should be reviewed and approved by the IACC. | | This has been discussed with IACC and will be issued after the DCO submission. |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | Further detail is requested on the precise areas that temporary/stopping up measures would be required. National Grid should ensure the correct terminology is used when referring to temporary traffic prohibition orders, etc. | | This detail is included in DCO Schedule 13. |
| | Further information is requested on restricting vehicles during school pick-up/drop-off periods, in particular how it will be implemented, monitored and managed to ensure staff are compliant with this measure. | | Discussion with IACC on this matter is ongoing and the OCTMP (Document 7.5) includes further details on this. |
| | Section 10.3 states that a dedicated Traffic Safety and Control officer is proposed as mitigation. The Council and Arup have stated on a number of occasions that there should be a commitment to a dedicated, council-based officer to monitor the impacts of construction i.e. the following comments made in Arup's technical review of the 'North Wales Connection – Transport Assessment Scoping Report', dated 30 November 2016, are re-iterated as part of this response to the Draft Transport Assessment, 'Commitments for mitigation, control and monitoring measures should be secured by way of an agreed CTMP prior to submission, DCO Requirement, and where appropriate Section 106 Obligations, including the establishment and funding of a Transport Monitoring Group to facilitate engagement of the LHAs throughout implementation.' It's not clear if this proposed measure included in the Draft Transport Assessment will be an additional measure to the request made by the Council. | | Noted. Discussions with IACC on the need for a Transport Management Supervisor are ongoing and the Outline CTMP (Document 7.5) includes for a Traffic Control and Safety Officer and a Transport Review Group. |
| | Table 10.1 provides a list of junctions proposed to have HGV restrictions during peak periods. National Grid should confirm how this will be implemented. As requested above, proposals to restrict movements during pick-up/drop-off times, is likely to result in a concentration of trips within both the highway and school peak periods. | | Discussion with IACC on this matter is ongoing and the OCTMP (Document 7.5) includes further details on this. |
| Section 12 Framework Travel Plan | This section of the draft Transport Assessment provides information relating to National Grid's commitment to sustainable travel. It is noted that, due to National Grid's operational requirements, and their health and safety obligations, staff (National Grid and their contractors) would not be permitted to enter construction areas via sustainable travel methods. It is recommended that National Grid explore options for centralised (non-construction) areas for workers to transfer workers to site. This would allow for workers to cycle to these areas. | | This section has been updated from the Batch 2 submission and expands upon worker travel. |
| | The report also indicates that active travel is not permitted during the construction phase of development. With respect to the point made above, | | This section has been updated from the Batch 2 submission and expands upon worker travel. |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | National Grid should confirm the policy on active travel, as there is a difference to prohibiting active travel to construction sites and during the construction phase as a whole. | | |
| | The report provides a breakdown of peak workforce numbers for each construction element. It is not clear as to what the peak, cumulative workforce numbers are likely to be across all construction elements. | | The Transport Assessment (Document 5.13.2.1) provides greater clarity on this. |
| | The report states that parking would be provided at specified locations (such as construction compounds). It is not clear if these trips have been accounted for in the junction assessments. | | The Transport Assessment (Document 5.13.2.1) provides greater clarity on this. |
| | Section 12.9 provides the overarching principles for staff travel to site. It is requested that further detail be provided to agree some of the detail in this section. For example, the location of designated pick-up/drop-off areas at accessible locations. The impacts of these locations will need to be minimised. | | Noted. The Transport Assessment (Document 5.13.2.1) provides greater clarity on this. |
| | Section 12.10 provides the measures and initiatives identified for the project. It references Public Transport and Car Sharing as specific measures. It is not clear if there are any specific measures that will be implemented to provide travel sustainable travel. For example, not all areas of the site will be well served by public transport. With limited parking available, there is a potential that workers may choose to park locally which may have knock-on consequences for residential settlements. | | The Transport Assessment (Document 5.13.2.1) provides greater clarity on this, and the amount of on-site parking which is considered to be sufficient to avoid impacting on nearby residential settlements. |
| | The following comments made in Arup's technical review of the 'North Wales Connection – Transport Assessment Scoping Report', dated 30 November 2016, are considered to apply to the Framework Travel Plan submitted as part of the Draft DCO documents, 'It is recommended that a Full Travel Plan is developed which details initiatives, monitoring and targets. Further discussions are requested with LHAs to identify appropriate measures such as Park & Ride/Park & Share options which have previously been referenced by IACC as an option to reduce the proportion of vehicles on the highway network. It is expected that the Councils will be consulted on the draft Travel Plan prior to DCO submission.' | | Noted. Noted. The Transport Assessment (Document 5.13.2.1) provides greater clarity on this. Given the low workforce numbers even during the peak of construction, and the likelihood of more than one end contractor working across a broad geographical area, it is considered to be impractical to provide more detail than a Framework Travel Plan for submission. |
| | It is noted in the mitigation proposals that a number of measures such as traffic calming could be implemented to reduce speeds at Location 3 (B5420 / OHL | | Noted. |

| Table 1: Isle of Anglesey County Council | | | |
|---|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| Annex L – Physical Mitigation Measures | Compound Access). The details of these measures will be required to be agreed with IACC in advance of construction. | | |
| | Location 6 Llanddaniel Road / National Cycle Route Network Route 8 between access E7 and E6 – The report states that the width on NCRN8 is 5.5m wide. The Council have concerns that road safety, arising from overtaking of cyclists, may be an issue at this location. The options included in Option 2 (Annex L) provide an illustration of temporary road widening options that could be implemented. There is no reference to cyclists and provision for safe overtaking. It is requested that National Grid clearly demonstrates that the impacts on cyclists are fully taken into account and assessed as part of the Road Safety Audit. National Grid shall also demonstrate they have consulted with Sustrans regarding these proposals and the implications on the National Cycle Network. | | Noted. This has been discussed with IACC and we welcome their suggestion of a possible diversion route, which came through discussion with Sustrans undertaken by IACC. Provision has been made in the DCO Plans and Schedules for a temporary diversion of this route in the event that HGVs are required to use this route. |
| | Location 7 Lon Pont Ronwy / A5 – The report makes reference to the Network Rail bridge at this location. Details on the bridge condition survey are requested. The potential for two vehicles to arrive at the same time to access this area is not clear. Should this happen, there remains the potential for road safety issues in the event of queuing on the A5. | | Noted. Discussed in Thematic Group meetings with IACC and explained further in the TA (Document 5.13.2.1). |
| | Location 8 Unnamed Road 22 / Pont Ronwy – the image appears to indicate that access for HGVs will be provided from the South. Confirmation of the routeing strategy at this location is requested. | | Noted. Explained in Thematic Group meetings with IACC and explained further in the TA (Document 5.13.2.1). |
| Question 5: Are there any changes or inconsistencies in the project detail following on from s42 or any Thematic Working Group? | National Grid provided a Transport Assessment Scoping Report on the dated 17 November 2016. In order to understand what changes have been made following IACC's and Arup's (dated 30 November 2016) response to this document, a summary has been provided below. | | See below |
| | Personal Injury Accident data has been provided for the most recent 60 month period. | | At the scoping stage it was stated that National Grid would use Crashmap if unable to obtain PIA data. National Grid has requested this data from IACC but this has not yet been provided. In March 2018 North Wales Police stated that they would be able to provide this PIA data. This data has not been provided to National Grid and as a result it has not been possible to incorporate into the submission. |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | An initial list of junctions for assessment was provided following preliminary assessment of potential construction routes within the PEIR and initial discussions with the LHAs (a total of 26 junctions). This was increased to include additional junctions (a total of 40 junction). | | Noted |
| | It is noted that not all junctions have been included in the assessments. For example, the Ty'n Ffrwd Junction (B5111), adjacent proposed temporary access B9, has been excluded. IACC requires such junctions stated within previous correspondence to be adequately assessed as part of the TA. | | This junction has now been added to the Transport Assessment. No further junction assessment is considered necessary. |
| | The approach to undertake 'sensitivity' tests to account for the tourist season (August) in order to establish a factor to represent the seasonal variation in traffic flow is welcomed. | | Noted |
| In addition, IACC has considered whether the information in Batch 2 has addressed earlier concerns. Issues that were raised at Section 42 and are still considered to be outstanding are listed below: | Personal Injury Accident data has provisionally been obtained through the CrashMap website although it will be supplemented by relevant additional data held by the local authorities and reported in detail in the TA. PIA data should be obtained from the Local Authority for links contained within the study area (ID 185). As above, PIA data should be used as part of the Highway Safety analysis in Section 7. | | At the scoping stage it was stated that National Grid would use Crashmap if unable to obtain PIA data. National Grid has requested this data from IACC but this has not yet been provided. In March 2018 North Wales Police stated that they would be able to provide this PIA data. This data has not been provided to National Grid and as a result it has not been possible to incorporate into the submission. |
| | "Confirmation of proposed AIL vehicle types and specifications", during a site visit between National Grid and the Councils on 14/10/16, it was confirmed that the precise dimensions for the AIL vehicles are currently being obtained. This approach is supported and will allow the Council to fully understand the composition of vehicles on the highway network and the likely impacts (ID 186). The information has not been provided as part of the Batch 2 submission. It is expected that this information will be provided prior to the DCO submission. | | An AIL report has been submitted as Annex B to the Outline CTMP (Document 7.5). |
| | Additional surveys are planned to be undertaken in 'neutral' traffic conditions outside of the school holidays, and will be further consultation with the highway authorities. It was noted during the site visit (14/10/16) between National Grid and the Councils that traffic surveys are currently being undertaken. The Councils consider November to be a neutral month for Anglesey. It was also confirmed that further surveys will be commissioned as part of the Transport | | The Transport Assessment Scoping note has been revised since this comment was made and has been discussed with IACC at subsequent meetings. The survey information included as part of the assessment is considered to be appropriate and robust. |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | Assessment, following agreement on the scope of the works required with the Councils (ID 185). To date, traffic queue surveys have only been commissioned at a small proportion of junctions included in the scope of assessment. Queue surveys are required to enable the junction models to be validated. | | |
| | "Trips relating to commuting construction staff traffic will be predominantly local in nature" - Further information is requested to understand the precise mix of locally and non-locally based staff movements (ID 192). Further information will be required as part of a Full Travel Plan to enable targeted measures to be identified, and implemented, as part of the Proposed Development. | | The Transport Assessment (Document 5.13.2.1) considers the likely origin and destination of the workforce. See above comment on the Travel Plan. |
| | It is anticipated that the DCO will grant powers to temporarily stop up PRow affected by the Proposed Project. Preliminary assessments envisage that the majority of the PRow will be stopped up for short durations and it is National Grid's hope and intention to keep the majority of PRow open via management. During a site visit between National Grid and the Councils on 14/10/16, National Grid confirmed that PRow will be managed on a site by site basis through signage and temporary routeing (ID 212). The Council has concerns that the impacts on the PRow network will be affected during the construction phase. Further information is requested to understand how the impacts on pedestrians will be minimised. | | Effects on PRow are documented in ES Chapter 13, and management measures to mitigate effects are considered in the PRow Management Plan. |
| Finally, IACC considers that the following information/details remain outstanding. | Britannia Bridge - There is no reference to the operation of the bridge during construction, and the impacts of traffic forecast to be generated by the Proposed Development. An increase in traffic at this location is likely to have impacts, and these are required to be acknowledged in the supporting transport document with appropriate mitigation, should there be significant impacts. | | Further consideration of the effects of the Proposed Development on Britannia Bridge are considered in ES Chapter 13 and the Transport Assessment. |
| | PRow mitigation - The PRowMP is yet to be provided, and as such, the mitigation proposed as part of the Proposed Development is not yet known. It is likely that there will be impacts on users of the Wales Coast Path. Mitigation proposals should be provided in advance of the DCO submission. | | Effects on PRow are documented in ES Chapter 13, and management measures to mitigate effects are considered in the PRow Management Plan. |
| | Wylfa Newydd development - The inclusion of the proposed Wylfa Newydd development traffic information as part of the Transport Assessment. The latest information regarding Wylfa Newydd should be included in the TA as part of the | | The cumulative assessment for ES chapter 13 and the Transport Assessment (Document 5.13.2.1) is based upon the DCO submission for Wylfa Newydd. |

| Table 1: Isle of Anglesey County Council | | | |
|---|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | DCO submission. National Grid will be required to demonstrate that they have obtained the latest evidence from Horizon Nuclear Power. | | |
| | Traffic Safety and Control Officer – IACC has requested that there should be a commitment for mitigation, control and monitoring measures to be secured by way of an agreed CTMP prior to submission, DCO Requirement, and where appropriate Section 106 Obligations, including the establishment and funding of a Transport Monitoring Group to facilitate engagement of the LHAs throughout implementation. These comments are still relevant and IACC requests further clarification on this matter. | | Discussions with IACC on the need for a Transport Management Supervisor are ongoing and the Outline CTMP (Document 7.5) includes for a Traffic Control and Safety Officer and a Transport Review Group. |
| Volume 5, Chapter 14, Air Quality | | | |
| Overall conclusion of factual assessment | We would point out that the consultation draft of Planning Policy Wales (Edition 10) contains a completely new section on air quality and soundscape, running from paragraph 5.125 to paragraph 5.146. There are also other references to air quality, noise and soundscape running throughout the document. However, paragraph 5.128 states that “the planning system is preventative and should maximise its contribution to achieving a healthier Wales by aiming to reduce average population exposure to air and noise pollution alongside action to tackle high pollution hotspots.” Whilst this document is a consultation draft, it is a material consideration that will gather significant weight as the application progresses through the DCO examination, and IACC accordingly expects National Grid to take this into account. | | PPW10 incorporates the wellbeing and future generations act into PPW and may also incorporate some of the Wales Policy guidance (June 2017) which is referred to in the comment under question 5. We are including a new section in section 2 of each technical chapter as per the briefing note which covers PPW10 and also incorporated this into the planning statement which will address this comment. |
| Q1 Does the information provide sufficient detail/clarity on National Grid’s proposal/position? | The construction routes are presented, which had been missing. The information in the documents is complete and clear in presenting National Grid’s position. | | Noted |
| Question 2: Is the detail submitted adequate (ie, in order to make an assessment)? | See answer to question 1. | | Noted |
| Question 3: Is there anything missing? What are the gaps? Do you | 3.134 of Chapter 14, document 5.14: IACC considers that construction receptors should be placed 50m from the site boundary along the whole site boundary (rather than just 50m from main activity areas) or their exclusion should be | | Box 1 of the IAQM guidance refers to ‘site boundary’ for the screening of whether a dust assessment will ‘normally’ be required. However, Tables 2, 3 and 4 of the assessment method described in |

| Table 1: Isle of Anglesey County Council | | | |
|---|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| have any views on the impact assessment by National Grid? | justified by reference to the work that will be carried out on the site at that point. This would be in accordance with the SoS Scoping Opinion which is referenced in Table 14.4 reference 3.134: "The IAQM 2014 guidance also states that the distance of ecological receptors should be considered 50m from the site boundary; however paragraph 11.6.5 of the Scoping Report refers to 50m from "construction activity". Any departures from guidance should be clearly explained and justified". By not including 50m from the whole site boundary, or providing justification for the exclusion of points, this appears to be a departure from guidance. | | the guidance, which are used to determine the sensitivity of the area, refer to 'Distance from the Source', rather than site boundary. However, it is confirmed that the assessment is based on the site boundary (Order Limits) and wording in the chapter has been updated to reflect this. |
| | 4.4.6-4.4.7 of Chapter 14, document 5.14: Dispersion modelling of emissions from Non-Road Mobile Machinery (NRMM) at locations of greatest activity should be carried out. If NG are not proposing to carry out dispersion modelling, this should be justified by providing estimates of the number of vehicles/equipment, their Stage type and hours of operation. The operation - while temporary - will continue over several years, and therefore has the potential to affect long-term as well as short-term objectives. NRMM usage can be intensive and can give rise to high localised concentrations. | | NG are not proposing to carry out dispersion modelling of emissions from Non-Road Mobile Machinery (NRMM). Instead, the chapter has been updated to provide details on the plant to be used, the duration of use and the distance of these sources to the nearest air quality sensitive receptors. |
| | 1.3.2 7 Appendix 14.3, document 5.14.2.3: The impact of terrain on the model results should be assessed via a sensitivity test. The terrain model assesses the impact of wider terrain on wind direction and turbulence not just the flow which is in the immediate vicinity of each source. | | Appendix 14.3 now includes a sensitivity test using terrain data for the study area in the vicinity of the emergency generators. |
| | 1.6.3 – 1.6.7 Appendix 14.3, document 5.14.2.3: It is not clear whether the calculation of period means and annualisation of diffusion tube data has taken into account the actual period that each tube was exposed e.g. 28 days, 30 days. This can have a significant effect on calculated period means. NG should provide clarification in the chapter. | | Sampling periods are provided in Table 14.3.8. |
| | 1.6.8 – 1.6.16 Appendix 14.3, document 5.14.2.3: The road traffic model verification used four different verification factors and up to a value of 6.60. This is quite varied considering the small domain and the factors are relatively large. The modelling and assumptions should be revisited to see whether more reasonable factors can be derived. | | The verification exercise, as described in Appendix 14.3, has been updated following the completion of the 12 month NO2 diffusion tube survey. |

Table 1: Isle of Anglesey County Council

| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
|---------------------------------|---|----------------|--|
| | <p>1.8.1 Appendix 14.3, document 5.14.2.3</p> <ul style="list-style-type: none"> A) The use of 60 g/m3 as a surrogate for exceeding or not exceeding the hourly threshold is an approximation, not a reliable surrogate. This is why it is suggested by IACC that hourly monitoring be put in place in the A55 layby(s), where parking motorists can be exposed over the relevant time period. | | <p>Following the completion of the 12 month diffusion tube survey, the projected annual mean (2016) concentration at the A55 layby on Anglesey is 43.7 µg/m3.</p> <p>Outside of the chapter, as an enhancement measure, NG are currently liaising with IACC and HNP over the hourly monitoring of NO2 concentrations at the layby in question.</p> |
| | <ul style="list-style-type: none"> B) 5.14.2.2, Appendix 14.2, Construction Dust Assessment Method & Supporting Information | | N/A |
| | <ul style="list-style-type: none"> C) Table 14.2.19 - this table suggests that a complaints log will be made available to the local authority when asked. IACC would wish to see a web based log with shared live access. | | Noted. A decision has not yet been made regarding the form of the complaints log. |
| | <ul style="list-style-type: none"> D) This table also suggests that dust deposition, dust flux, or real-time PM10 continuous monitoring locations will be agreed with the Local Authority: "Where possible commence baseline monitoring at least three months before work commences on site" IACC agrees with this but notes that baseline monitoring is usually undertaken over a minimum of 9 months. IACC further notes that this would best be secured through a requirement relating to air quality controls and expects to continue discussions in this regard. | | <p>Noted. Discussions regarding monitoring are ongoing.</p> <p>During a meeting hosted by IACC (Particulate Matter and Dust Deposition Thresholds/Monitoring Meeting, 11/01/2018) it was suggested that existing IACC data could be used to represent baseline conditions.</p> |
| | <ul style="list-style-type: none"> E) The table also suggests the avoidance of site runoff of water or mud. This will be particularly important within the Cemaes Bay bathing water catchment as that bathing water has been designated as "Poor" once again for 2018. IACC would wish to see details of the measures National Grid will put in place to avoid run off of soil from fields into the watercourse. | | Details regarding measures proposed to ensure site runoff does not pollute waterbodies are provided in the CEMP (Document 7.4). |
| | <ul style="list-style-type: none"> F) The table also recommends:-"Avoid bonfires and burning of waste materials". There must be no burning of waste as this may an offence under both Dark Smoke Legislation (Clean Air Act 1993) and under waste activities. | | This point is already addressed in the CEMP (Document 7.4). |
| | <ul style="list-style-type: none"> Table 14.12 Measurement and Monitoring Data – Section A Wylfa to Rhosgoch. This table reports the Felin Cafnan annual PM10 figure for 2016 as being 34.8ug/m3. This is the figure for 2015 and only relates to the period 15th December to the end of that year. The following year the annual average was 14.9ug/m3. | | This error has been corrected in the chapter. |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <ul style="list-style-type: none"> Table 14.2.2 identifies on site crushing and screening activities. These activities will require an Environmental Permit under the Environmental Permitting (England and Wales) Regulations 2016. | | Noted |
| Question 4: Are the mitigation proposals adequate and fit for purpose? | No. National Grid should commit to all generators achieving an emission limit of 400mg/Nm3 of NOx, or lower, at 273K, 101.3kPa, 5% oxygen, dry gas, in order for the Council to ensure that the generators used are clean, rather than old generators or new generators with mitigation. (Appendix 7 of: https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/Sustainable%20Design%20%26%20Construction%20SPG.pdf) | | <p>The guidance referenced in the comment is relevant to London (published by the Mayor of London) and is not intended for use across the UK as a whole.</p> <p>The generator plant is for emergency use, with limited operation for testing and maintenance.</p> <p>The assessment described in the air quality chapter demonstrates that the operation of the emergency generator plant would not have a significant effect on local air quality, based on the assumptions modelled.</p> |
| | The energy generation plant considered in this assessment is based on the site energy demand being met by a series of Caterpillar 3500 series diesel generators. However, at this stage the actual manufacturer and supplier of the energy generation plant is unknown. National Grid should ensure the “Best Practicable Means” to secure the best solution possible in terms of both Air Quality and Noise. | | <p>The generator plant is for emergency use, with limited operation for testing and maintenance.</p> <p>NG will demonstrate that the actual plant to be used will not have a significant effect on local air quality, following the application of mitigation, if required.</p> |
| | The construction of the shafts and tunnel for the crossing of the Menai Strait would require an energy demand of around 9.6 MW, mostly to power the tunnel boring machine (TBM) and ventilation fans. The crossing would require the sinking of a drive shaft from which the TBM would be launched (7.2 megawatt (MW)). It is proposed that the energy demand would be met by a low voltage power supply sourced from the Scottish Power Energy Network although on the Anglesey side there would be six emergency diesel-fired generators. It has been assumed that eight emergency generators could be operational for up to 500 hours of the year. The document acknowledges the difficulty of modelling for the shorter averaging periods of 24 hours and 1 hour and while power cuts may be less than 1 hour there remains a possibility of exceedance of the 1 hour NO2 objective at the Braint THH. Therefore, National Grid should consider installing an NO2 monitor similar to AQ Mesh at the Tunnel Head House locations. | | <p>The modelling and analysis of short term NO2 impacts has been undertaken, assuming all emergency generators would be operational at 100% load for every hour of the five meteorological years considered (2012 – 2016). This predicted zero exceedances of 200 µg/m3 at any of the air quality sensitive receptors considered, assuming a 35% NOX to NO2 conversion rate.</p> <p>Outside of the chapter, as an enhancement measure, NG are currently liaising with IACC over the monitoring requirements of the project. However, in light of the above, NG don’t envisage that monitoring will be required in the vicinity of the emergency generators.</p> |

| Table 1: Isle of Anglesey County Council | | | |
|---|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | Hourly monitoring should be put in place in the A55 layby(s), where parking motorists can be exposed over the relevant time period. | | NG are currently liaising with IACC and HNP over the hourly monitoring of NO2 concentrations at the layby in question. |
| Question 5: Are there any changes or inconsistencies in the project detail following on from s42 or any Thematic Working Group? | <p>Yes. Table 14.2 Compliance with NPS (EN-1) states that “The IPC should generally give air quality considerations substantial weight where a project would lead to a deterioration in air quality in an area, or leads to a new area where air quality breaches any national air quality limits. However air quality considerations will also be important where substantial changes in air quality levels are expected, even if this does not lead to any breaches of national air quality limits”. National Grid should be aware that the new local air quality management in Wales Policy guidance (June 2017) states:-</p> <p><i>“However, the national air quality objectives are not ‘safe’ levels of air pollution. Rather they represent a pragmatic threshold above which government considers the health risks associated with air pollution are unacceptable. Air just barely compliant with the objectives is not ‘clean’ and still carries long-term health risks. Nitrogen dioxide and particulate matter currently have no safe threshold defined, and the lower the concentration of those pollutants, the lower the risks of adverse health effects in the exposed population. Therefore, while compliance with the national air quality objectives is essential, it is desirable to keep levels of pollution as low as reasonable practicable.”</i></p> | | The air quality chapter now includes discussion of this Draft Planning Policy (Section 2.3). |
| | <p>Document 5.14.1.1 – ES Figure 14.1: This shows Penmynydd as a contingency route. The IACC requires definition of “contingency” as well as an estimate of the volume of traffic that could be expected with “contingency”? IACC has expressed concern in the TWG that this access is, for several reasons, not appropriate to access the construction compound and is concerned that within Penmynydd Village several properties boarder onto kerbside and will experience noise, vibration and air quality effects from high vehicle use.</p> | | A definition of ‘contingency route’ is provided in Chapter 13 Traffic and Transport (Document 5.13). Sub-Appendix B of Appendix 14.3 provides traffic data as 24 hour annual average total vehicle and HGV flows for this link. |
| Volume 5, Chapter 15, Construction Noise and Vibration | | | |
| Overall conclusion of factual assessment: | The assessment is generally clear and is backed up by significant quantities of supporting information. IACC do not necessarily fully concur with all the conclusions, and these are raised in the current round of comments on SoCG. | | Noted |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | Please note IACC's comments in respect of Planning Policy Wales (10th Edition), p7 refers to Edition 9. | | Each ES Chapter considers the draft PPW 10 as well as the adopted PPW 9 under the PPW sub heading. |
| | In respect of Table 15.19: General CEMP Measures Relevant to Noise Effects, normal construction times usually apply to weekdays, Saturday morning until 1300 and no noise activity on Sundays and Public Holidays. IACC expects discussions on working hours to continue through the TWG and beyond if necessary. | | The matter of working hours has continued to be discussed. The working hours set out in the DCO and CEMP are those considered necessary in order to ensure the programme can be achieved and the connection date for Wylfa Newydd met. |
| Question 1: Does the information provide sufficient detail/clarity on National Grid's proposal/position? | The applicant has carried out a thorough assessment, and provided documentation which is generally clear and accessible. There are a number of points of detail regarding the assessment which IACC has concerns about, or could be differently presented to increase accessibility, which are set out in the response to questions below. | | Noted |
| | In general, the map locations for each measurement location is a helpful guide. The baseline applicability zones are marked clearly on the map. It has been noted that the zones have been amended in response to engagement, which is appreciated. The figures are clear and helpfully enable interpretation of the Chapter's text. | | Noted |
| Question 2: Is the detail submitted adequate (ie, in order to make an assessment)? | In general, the detail submitted is adequate, however some comments have been provided to identify where the details of the assessment could be clearer. | | Noted |
| | The identification of significance is confusing. Table 15.7 has a range within which it identifies a Medium Magnitude of Construction Noise Effect. This value in Example 1 is in >60 & <65 in terms of absolute level. It also meets the test of being >5dB above baseline. Logically this would place it in the 'Low' magnitude of effect, not Very Low as suggested. Text in para 4.5.8 indicates that a significant effect would not be likely, but there is no link made between this test and the ranges of absolute noise level in Table 15.7. It is not clear whether the noise levels in Table 15.7 are construction noise alone or 'construction plus ambient'. To be more accessible, the table could say how National Grid determine which criterion to use where there are ranges and a level relative to background. | | It is noted that a greater than sign rather than a less than sign was used in the table. The table should read < 5 dB above baseline for the 'Low' magnitude criterion and < 1 dB above baseline for the 'Very Low' magnitude criterion. It is agreed that the example mentioned should read 'Low'. The Table has been amended for the final ES. |
| | Example 3 - similar issue to Example 1, only here it is not clear which of the criteria should be used - the relative level or the range of absolute levels. The absolute level would put it in Low, but the 4dB increase would put it in Very Low. | | As above. |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | Words needed to explain which takes precedence - use of 'or' may not be helpful. | | With the change noted under (a) above, Example 3 would remain as 'Low'. |
| | Table 15.10 is copied from BS5228-2, and needs modification for use as criteria. The second row requires an upper bound to make it a range and thus work as an unambiguous criterion. | | This has been updated to include the upper bound. It was confirmed at the thematic group meeting held on 12 th April that there are no further requirements here. |
| | Interpretation of Table 15.16 would be greatly enhanced by having a plan which shows both the outline of the construction sites (as shown on Figure 15.2 etc.) and the medium and high sensitivity receptors identified. | | This has been updated in the final ES. |
| | Figure 15.1 sheet 6/6 has an area usage zone P1, which is not listed in Table 15.17 | | The plans have been updated and Zone P1, which is not used in the assessment, has been removed. |
| | The wording in Table 15.19 differs in some places from that in the CEMP reviewed in Batch 2. A number of these changes are highlighted below. Table 15.19 NV12 differs to the CEMP, by adding that monitoring would be carried out for comparison with limits. IACC would wish to see measurements to confirm plant noise and vibration assumptions where there is doubt regarding the source assumptions, and where they can be used to refine techniques to reduce adverse noise and/or vibration effects (e.g. charge refinement for blasting, as alluded to in NV32). | | Consistency of wording between Chapter and CEMP has been picked up for the final version of the ES. Noise limits etc. and proposals for noise monitoring have been identified in the NVMP (Document 7.9). |
| | NV14 refers to provision of hoardings/barriers around worksites to ensure that noise limits are met. Again, the reference to noise limits was not in the CEMP, which stated 'as necessary' but did not state how 'necessary' was determined. If a controlled level of noise emissions is being proposed that needs to be identified and controlled through a DCO requirement. | | Noise limits etc. have been identified in the NVMP (Document 7.9). These will be used as a basis to determine where hoardings/ barriers would be required. |
| | There appears to be a mix of control measures referred to in this table i.e. noise limits in a Requirement, and s61 consents. The control mechanism being proposed by National Grid ought to be clearly identified. | | The main control mechanism for construction noise and vibration will be the NVMP (Document 7.9). Noise limits etc. have been identified in the NVMP. |
| | NV31 - IACC welcome the proposed reduction in working hours compared with those in the CEMP for surface drilling and grouting for the shafts such that it would not take place on Saturday afternoons or Sundays. It is noted that these working hours are contradicted by those in section 9.7.4. However, it is | | The matter of working hours has continued to be discussed. The working hours set out in the DCO and CEMP are those considered necessary in order to ensure the programme can be achieved and the connection date for Wylfa Newydd met. |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | considered that 0700hrs start is too early for these activities. Also, these works should not be carried out on public/bank holidays. | | |
| | IACC would generally welcome the proposed measures in NV32 for the management of blasting noise and vibration, subject to the comments already provided on the CEMP. | | Noted |
| | NV34 - differs between the CEMP and Table 15.19, latter includes for a 100kW generator, whereas CEMP refers only to low voltage supply. CEMP is consistent with section 9.2.3. We also welcome the addition of NV38. | | The wording in the CEMP and the ES chapter has been updated to be consistent. |
| | The conclusion that criteria are exceeded/significant effects only occur at weekends supports is of concern to IACC. As IACC has previously noted, works that could give rise to “observable adverse effects” should not be undertaken Saturday afternoon/Sundays, and bank/public holidays to provide respite to residents. It is requested that construction hours are amended / limited for particular construction activities. | | The working hours set out in the DCO and CEMP are those considered necessary in order to ensure the programme can be achieved and the connection date for Wylfa Newydd met. |
| | IACC consider that there is a possibility that receptors nearest to the actual pylon worksite and adjacent to the access track could see noisy works for in excess of 4 weeks. This is not indicated in the assessment as the access track works and construction site works are separated. Alone, neither exceeds 4 weeks. IACC would welcome a summary at the end of these two sections collectively which considered receptors affected by both elements of work and presenting the total duration over which the activities could occur, to demonstrate that the summation does not exceed the one month break-point. If NG’s assessment relies on that period not being breached, that should form part of its NVMP. | | The wording of the chapter and assessments have been reviewed and updated in Section 9.7 ‘summary of effects from overhead line construction works’. |
| | Drill and blast is 6 to 9 months (s9.7.6), but the medium magnitude effects are described as very short term, resulting in no significant effect. Clarity is required in particular in relation to the proposed blast mat to enable a judgement to be made as to whether the effects really are short term. | | Short-term in this case refers to the duration of each blast, and is not to be confused with the term ‘short-term’ as used for other parts of the assessment. The wording has been revised to address this. It was discussed in the meeting held on 12 th April that the blast mat would be placed at the bottom of the blast area, not at the bottom of the shaft, and the wording has been updated in the ES Chapter. The blast mat would be selected by the contractor. |
| | The summary in Section 9.10.1 is welcomed, as it provides a helpful and accessible round up of the foregoing detail. | | Noted |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | In areas where there is the potential for cumulative effects as appears in Table 15.43, measures to manage cumulative noise should be secured through DCO requirement and the Noise and Vibration Management Plan (NVMP) which IACC has yet to see. | | Construction noise effects are set out in Chapter 15, Construction Noise and Vibration (Document 5.15), together with appropriate mitigation measures and consideration of potential cumulative effects. Appropriate control and management measures are set out in the Noise and Vibration Management Plan (Document 7.9). National Grid would work with HNP to reduce any significant cumulative noise effects, where possible. |
| | There are one or two typographical errors in the Legend compared with the title for Figure 3, which need resolving for the final documents to avoid confusion between options A and B construction assessment zones. | | These have been reviewed and the Figure has been updated. |
| Question 3: Is there anything missing? What are the gaps? Do you have any views on the impact assessment by National Grid? | Whilst IACC does not consider anything missing, we would make the following observations. Please note that we have not repeated the comments made on the CEMP re blasting on Sundays. | | Noted |
| | There is no plan showing location of noise measurement locations as a whole, only individual micro siting. This could be addressed by amendments or additional labelling in Figure 15.1. | | This information has been added to the Figure as requested. |
| | Table 15.1 (Section 8.1.1) repeats the normal working hours, which IACC consider to be excessive (including Saturday afternoons and all day Sunday, with no exemption for public/bank holidays). It states that these hours would also be applied to HGV movements. IACC considers that HGV movements should be restricted such that they do not occur on Saturday afternoons, Sundays or bank/public holidays. The core working hours are described under the control and management measures section (9.25 and Table 15.19). The early hour at which piling could commence is of particular concern. IACC dispute that the core working hours as proposed represent a mitigation measure, as they are considered to be excessive for non-tunnelling support activities. | | The working hours set out in the DCO and CEMP are those considered necessary in order to ensure the programme can be achieved and the connection date for Wylfa Newydd met. |
| | The interpretation of Figure 15 could be enhanced by including the baseline applied to the zones as is shown for operation in appendix 16.2.1. GC: On sheet 6 of 6, there are two zones marked with an 'S', which is confusing. In determining which baseline is applied to the zone, the Council have made reference to Appendix 15.1. The map determining measurement location for LT_R (Unit 2) is missing. | | This Figure has been reviewed and updated. |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | It is suggested that the pylon locations / numbers are shown on the figures. In addition, the figures do not clearly identify road links by reference to Appendix 15.13 page 2 First table "model input data" or receiver locations by reference to Appendix 15.13 second and third tables. | | This information has been added to the Figure as requested. |
| Question 4: Are the mitigation proposals adequate and fit for purpose? | IACC does not consider the proposed mitigation measures to be adequate. | | |
| | The local authority agrees with the suggestion that the construction work should be subject to Section 61 (of the Control of Pollution Act 1974 (CoPA)) process. However, IACC expects to enter into discussions with National Grid to ensure that the additional resources required to respond to multiple s61 consent applications are in place. | | National Grid is discussion with IACC regarding resourcing. |
| | In terms of shaft air overpressure/vibration, IACC does not necessarily agree that it has been demonstrated that this will not be an issue. National Grid's text in response down-plays the shaft and TBM chamber works, but these will be of a significant length of time judging by the shaft size and volume of spoil generated. The Council does not consider that it has been demonstrated that there would not be significant environmental effects. Control of this issue is best dealt with by a Requirement imposing limits and/or s.61 consent (in which working hours can be imposed). This matter is subject to continued discussion with IACC. | | The main control mechanism for construction noise and vibration will be the Noise and Vibration Management Plan (NVMP) (Document 7.9). Limits for shaft air overpressure / vibration have been identified in the NVMP. This will be controlled via a S61 consent. |
| | The chapter refers to commitment in the NVMP - Doc 7.11 which the Council has yet to see. A check will be needed of the NVMP when received to check that adequate mitigation for 24 hour sites has been included. | | Outline mitigation measures for 24 hour sites have been provided in the ES and NVMP. The specific details will be agreed when a contractor has been selected through the S61 process. |
| | IACC is concerned that the proposed core working hours may be too long to prevent adverse impacts, particularly where works could give rise to adverse impacts on sensitive receptors: Working hours are too long Mon-Fri (in particular 0700 start); Saturday afternoon (1300-1900) working should not be generally permitted to provide respite; There should be no working on public or bank holidays (bar essential tunnelling support) (Section 4.3.8) | | The working hours set out in the DCO and CEMP are those considered necessary in order to ensure the programme can be achieved and the connection date for Wylfa Newydd met. |
| | Section 4.3.9 refers to 'works within the tunnelling construction compounds' being carried out 24 hours per day. IACC requires clarification as to whether the works referred to are necessary to support the tunnelling, in which case they are necessary, or whether they are general construction related works which do not need to be carried out over the full 24 hour period. | | Only works related to tunnelling would be undertaken 24 hours per day. |

| Table 1: Isle of Anglesey County Council | | | |
|---|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | Only vibration from piling has been numerically calculated, which suggests that vibratory compaction has not been quantified. It would be helpful if this was explicitly stated here. (Section 4.4.7) | | The wording of the ES Chapter has been amended. |
| | Whilst the table in Section 8.1.1 is not intended to present mitigation, it sets out that mains power rather than generators will generally be used after site establishment for tunnelling sites. IACC welcome this mitigation (also listed in Section 9.2.3. On p87 it states that soil-screening plant may run 24 hours/day. It is not clear why this should be the case unless this is actually bentonite processing plant required to support the TBM. Section 9.7.14 refers to a slurry screening system (24 hour) associated with the actual tunnelling. IACC sees no reason why spoil processing would need to be carried out at night with attendant risk of noise generation. | | This wording has been corrected to confirm that this is slurry screening plant and not soil screening plant. |
| | On p90, noise from HGVs is addressed, and it is stated that such movements would only occur during standard construction hours. IACC consider that the hours, which include Saturday afternoons and all day Sunday, with no exemption for public/bank holidays are not reasonable. | | The working hours set out in the DCO and CEMP are those considered necessary in order to ensure the programme can be achieved and the connection date for Wylfa Newydd met. |
| Question 5: Are there any changes or inconsistencies in the project detail following on from s42 or any Thematic Working Group? | No | | Noted |
| Volume 5, Chapter 16, Operational Noise | | | |
| Overall conclusion of factual assessment: | The information provided in the chapter is generally sufficient however further detail could be provided as set out below in order to provide greater clarity. | | Noted |
| | 2.3.14 See earlier comments about draft 10th Edition of PPW | | Each ES Chapter considers the draft PPW 10 as well as the adopted PPW 9 under the PPW sub heading. |
| | Table 16.3 states “Although IACC has raised this during the stakeholder discussions, it should be noted that the transformers at National Grid Wylfa substation are not part of the DCO application”. This may be the case but National Grid offer little in terms of possible practical mitigation of the paralleling | | This was discussed at the Operational Noise Thematic Group Meeting on 17 April 2018. |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | of the OHL in terms of noise and IACC expects noise mitigation for cumulative effects to be covered in an overall mitigation package. For example, this could include the removal of the noisiest transformer at Wylfa Sub-station rather than one of the quieter transformers. | | |
| | IACC welcomes the inclusion of the OHL Assessment Methodology Summary which had been agreed in the TWG. | | Noted |
| | IACC welcomes the inclusion of Appendix 16.4 – Taking into Account the Existing 400 kV OHL which has already been agreed in the TWG. | | Noted |
| | IACC considers that there may be a need to co-ordinate controls across different projects, taking account of the cumulative effects. IACC would expect National Grid to propose a DCO requirement to achieve this. | | This was discussed at the Operational Noise Thematic Group Meeting on 17 April 2018. Operational noise cumulative effects are considered in Section 10 of ES Chapter 16 Operational Noise (Document 5.16). Project-wide cumulative assessment is set out in Chapter 20 (Document 5.20). |
| Question 1: Does the information provide sufficient detail/clarity on National Grid's proposal/position? | The information provided in the chapter is generally sufficient. | | Noted |
| | Figures - the colours used in the legend for the decibel levels should be consistent across documents. | | Figures have been amended and use a standard colour palette. |
| | Appendix 16.2.1 – representative baseline area map - decibels are represented as DB rather than dB in the representative noise baseline areas. | | This has been amended. |
| Question 2: Is the detail submitted adequate (ie, in order to make an assessment)? | Reference is made to National Grid report TR(T)94 in Section 2.3.6. This document does not appear to be publically available, so an interested member of the public would not be able to pick up the reference. Could this report be included as an appendix, or (more practically) made publically available on National Grid's website? | | Included in the ES as Appendix 16.6 (Document 5.16.2.6). |
| | The Methodology section provides a clear, broad, accessible description of the guidance, standards and reports relied upon in the assessment, which is welcomed. | | Noted |
| | In Table 16.20 in the description of the difference between the assessment of Option A and Option B the text includes a reference to [name redacted] (R4/01483) not being considered as a residential receptor under Option A. No | | Cross reference added to Table 16.20 (renumbered to Table 16.17). |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | explanation is provided to justify this. It may therefore be appropriate to add a cross reference to aid the reader in understanding why the receptor is not being considered. Cross reference could be to Document 7.4.2.1, which states that the property would not be occupied. | | |
| | Section 7.2.9 describes a caravan park, and talks about an additional receptor code being assigned for it, which is deemed to be low sensitivity as it is commercial. It is not clear from the wording, or that of the previous paragraph whether caravans which have not been specifically identified as being in residential or semi- residential use are being treated as medium sensitivity receptors or not. In Table 16.15 caravans are described as medium sensitivity, without caveat as to their use. IACC is aware that caravans on Anglesey are used on a holiday stay basis and should therefore receive equal treatment to a hotel in terms of sensitivity. | | This was discussed at the Operational Noise Thematic Group Meeting on 17 April 2018. Table 16.15 has been amended (now renumbered Table 16.13) and the text in Section 7.2 clarified. |
| | IACC welcomes the information provided regarding the measures to be undertaken to minimise the chances of contamination of the conductors | | Noted |
| Question 3: Is there anything missing? What are the gaps? Do you have any views on the impact assessment by National Grid? | With respect to distribution transformers and drainage pumps, IACC agree that it should be possible to design this plant such that it is not audible beyond the site boundary. However, it is not clear from information in this table how this outcome will be secured. A DCO Requirement should be imposed to set noise limits to cover the totality of plant at the THHs/substations to ensure that the described outcome is achieved. (Table 16.2, paragraph 3.48). | | Agreed and discussed at the Operational Noise Thematic Group Meeting on 17 April 2018. All operational equipment at the THH sites would be covered by a DCO Requirement (DCO Schedule 3, Requirement 19, Operational Noise). |
| | Table 16.15 and section 4.6.3 set out receptor sensitivity. The table is not consistent with that in Chapter 15, which includes receptors such as hotels and places of worship. It may be that these types of receptor are only present within the construction scope, but this should be checked, as it impacts on the assessment outcome (see comment regarding Section 7.2.8 and 7.2.9). Further, schools are defined as Low sensitivity (whereas education facilities were Medium for construction in Chapter 15), with the argument made that they are not used at night and this is when the worst case occurs. IACC believe that the table should reflect the actual sensitivity of the receptor, and be consistent across both chapters. The assessment of significance would then take into account the fact that schools would not be used at night, and the outcome would be rated as not being significant when taking into account the factors applied on | | There are differences in the sensitivity categories between the two chapters as they reflect how sensitive the receptor is to the type of effect. A footnote to paragraph 4.6.2 describes the rationale that would be applied to schools if identified within the study area. There are no schools in the study area, although other education establishments have been identified and assessed. |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | a case-by case basis. This would be consistent with the method used for determining significance used in section 9 | | |
| | The use of language in paragraph 4.6.9 is a potential source of confusion in understanding the assessment. At this section, the language used differs to that in Chapter 15 in that it appears to switch to using the term 'significant impact' as the end point of the assessment. This is confusing and impairs the interpretation of the outcomes. Additional explanation, or a revision to ensure consistency across noise and vibration sub-topics would enable easier interpretation. | | Chapter 16 had been amended. |
| | Table 16.27 uses the word 'impact' to describe the outcome of the assessment. Clarification is needed to enable the reader to understand if this is a deliberate change compared with Chapter 15, and if so how it should be interpreted compared with references to significant effects. | | As above |
| | The Council welcomes the informative section regarding insulators, provided as discussed during the engagement process. However, no commitment is given to providing quieter forms of insulator, or information provided about whether noise will be considered as a deciding factor in the selection of insulator type. It is noted that potentially quieter types have been tested at Wylfa with respect to seeking noise reductions where salt deposition is an issue. The Council would like National Grid to specify where salt deposition or abnormally dusty areas could be an issue. | | Best practice would be followed to ensure the most appropriate insulator types and/or treatments are selected. Paragraph 8.2.19 in the ES states: <i>“For the new OHL, the most appropriate designs would be considered, taking into account, as far as practicable, local conditions, operational requirements and best practicable means from a noise perspective.”</i> |
| | As identified in the review of the CEMP, there is no information provided regarding prevention of contamination during storage of conductors at construction compounds, or of care during transportation. It is possible that conductors are brought directly to the stringing site and not kept at the construction compounds, but this has not been made clear. The description refers to NG codes of practice, and QA in transportation, but no clear commitments are set out. | | Appropriate commitments are set out in noise and vibration codes NV21 and NV22 in the CEMP (Document 7.4). |
| | During pre-application engagement, the Council has requested that information regarding the noise performance of the different conductors was included in the ES, to enable the reader and decision maker to understand the level of inherent mitigation associated with the choice of conductor. This does not appear to have been included. | | Information on the conductor type is included in Section 6 of the Preferred Route Option Selection Report (Document 2.1). |

| Table 1: Isle of Anglesey County Council | | | |
|---|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | Cumulative assessment - several projects may collectively with the Proposed Scheme have the potential to result in cumulative effects due to operational noise. The text <u>indicates that assessments would be required, and it is likely that planning requirements would need to be imposed on all projects to ensure that an acceptable total noise budget was not exceeded.</u> The Council requests that the necessary monitoring and mitigation measures are secured within the context of these overall caps on noise through a requirement with a mechanism for the Council to agree prior to implementation. Ongoing dialogue should be held between the parties and the local authority to discuss noise (and other issues (traffic etc.)) with a view to manage overall noise level at neighbouring sensitive receptors. | | This was discussed at the Operational Noise Thematic Group Meeting on 17 April 2018. Operational noise cumulative effects are considered in Section 10 of ES Chapter 16 Operational Noise (Document 5.16). Project-wide cumulative assessment is set out in Chapter 20 (Document 5.20). |
| Question 4: Are the mitigation proposals adequate and fit for purpose? | The mitigation proposals are generally considered to be adequate, although further information is needed which establishes the measures to be undertaken to minimise the chances of contamination of the conductors. | | Noted, addressed by comment above. |
| | The Council welcomes the commitment regarding exclusion of potential alternative pylon sitings within the LoD where these could give rise to a potentially significant effects / impacts. | | Noted |
| | Mitigation is described elsewhere in Chapter 16, and forms the mitigation assumed in concluding that there are no significant effects from the THHs. The Council considers that a suitable requirement is needed to ensure that the predicted rating levels are not exceeded. This should ensure that effective mitigation is provided to enable the conclusions as presented to be secured in the final design. | | All operational equipment at the THH sites would be covered by a DCO Requirement (DCO Schedule 3, Requirement 20, Operational Noise). |
| | See comment on Cumulative Assessment in response to Question 3. | | As above. |
| Question 5: Are there any changes or inconsistencies in the project detail following on from s42 or any Thematic Working Group? | No | | Noted |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| Volume 5, Chapter 17. Socio-Economics | | | |
| Overall conclusion of factual assessment | a. The Socio-economic and Tourism chapter is incomplete (see table 17.26). Certain areas have been developed following on from comments made by IACC, Gwynedd Council and Welsh Government through the TWG meetings and more formal comment during previous consultation stages. Whilst National Grid has indicated where issues raised have been taken into account, there remain a number of outstanding matters. | | Noted. This was one of the caveats that the chapter was issued with. |
| | <p>b. It is important that National Grid demonstrates an ambition and commitment to maximise the potential benefits of the £360m+ direct investment and to ensure that reasonable steps are taken to minimise the negative impacts through mitigation or avoided altogether.</p> <p>To do this effectively, a sound, <u>robust evidence base</u> is critical and it will be important for National Grid to work with the Local Authorities, their partners and other stakeholders if this is to be achieved.</p> <p>The Council is concerned about the delays to the preparation of this <u>evidence base</u> which have been conveyed through the TWG for some considerable time.</p> <p>Once that evidence base has been prepared, National Grid will be required to consider what further mitigation may be required in relation to its project on the basis of that evidence base.</p> <p>It is recognised that there is no statutory definition of what constitutes a 'significant' effect and professional judgements have been made where appropriate.</p> | | <p>National Grid's role in the energy network is to facilitate generation to ensure electricity can be used by homes and businesses. Secure and reliable grid connections play an important role in providing certainty and creating the right conditions for investment. As such, National Grid considers a benefit of the proposals to be related to the investment and jobs created by Horizon Nuclear Power.</p> <p>In isolation, no significant socio-economic effects are predicted for the Proposed Development, therefore no mitigation is proposed.</p> <p>Clarification to what is meant by 'evidence base' was sought and provided at the 4th Thematic Working Group meeting in April 2018. IACC explained that they mean the assumptions underpinning the assessment of wider effects, mainly relating to workforce numbers, skills profile and the accommodation assessment. In response to the comments relating to the 'evidence base', an additional appendix has been included in the ES, which sets out the assumptions underpinning the workforce analysis. See Appendix 17.2, Workforce Analysis Assumptions Log (Document 5.17.2.2).</p> |
| | <p>c. At the current time, IACC considers it is reasonable and appropriate to set out cumulative effects and opportunities with Wylfa Newydd, and this is supported.</p> <p>However, it is also imperative that there is complete transparency in respect of the effects directly attributable to the North Wales Connection Project (NWCP) alone</p> | | <p>Noted</p> <p>Section 9 of ES Chapter 17, Socio-Economics (Document 5.17) sets out the effects of NWC alone, and then in-combination in section 10.</p> <p>No significant effects are predicted from NWC alone and therefore no mitigation is required.</p> |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | and that measures are put in place to mitigate adverse effects and secure positive outcomes as far as possible. | | |
| | <p>d. There appears to be a heavy reliance on the Wylfa Newydd Nuclear Power Station baseline, which is to be expected to some extent.</p> <p>However, IACC considers that National Grid falls short on proposing mitigation measures or opportunities to maximise the socio-economic benefits which would align with the strategic policies of IACC and GC which is disappointing.</p> <p>In certain areas, National Grid suggest that they intend to rely on Wylfa Newydd Nuclear Power Station mitigation proposals e.g. accommodation.</p> <p>For the reasons set out below, IACC considers that more detail is required in this regard.</p> | | <p>ES Chapter 17 Socio Economics (Document 5.17) does not rely on the Wylfa Newydd baseline for the assessment of the Proposed Development, the baseline for the Proposed Development is provided in section 7.</p> <p>It was agreed at the 4th thematic working group meeting that the approach taken in the assessment was acceptable, with Wylfa Newydd baseline being considered in the assessment of cumulative effects.</p> <p>No significant effects are predicted from NWC alone and therefore no mitigation is required. Opportunities to maximise socio-economic benefits is enhancement and not mitigation. National Grid has a remit to be economic and efficient.</p> <p>National Grid is relying on the Wylfa Newydd mitigated assessment to inform the cumulative assessment rather than relying on mitigation for Wylfa Newydd to mitigate effects of the Proposed Development.</p> <p>National Grid has, and will continue to liaise closely with Horizon Nuclear Power. These discussions have been wide ranging and have included the potential use of Horizon's proposed Worker Accommodation Management Service (previously called the Construction Worker Accommodation Management Portal). National Grid and Horizon Nuclear Power will continue to keep this matter under review during Examination of the Projects.</p> <p>Further clarification in this regard was included in the letter from National Grid to IACC dated 28th March 2018.</p> <p>Enhancement opportunities are set out in the Enhancement Strategy (Document 7.13).</p> |
| | e. This chapter attempts to present wide-ranging information with mixed results. | | <p>Noted</p> <p>Noted</p> |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>The assessment of socio-economic benefits and impacts, including cumulative impacts (effects) is complex.</p> <p>The overriding objective for National Grid (NG) should be to work with IACC to ensure that the potential benefits of the £360m+ direct investment are maximised and negative impacts minimised, mitigated or avoided.</p> <p>To do this effectively, a sound, robust <u>evidence base</u> is critical.</p> | | <p>Enhancement opportunities are set out in the Enhancement Strategy (Document 7.13)</p> <p>Clarification regarding what is meant by ‘evidence base’ was sought and provided at the 4th Thematic Working Group meeting in April 2018. IACC explained that they mean the assumptions underpinning the assessment of wider effects, mainly relating to workforce numbers, skills profile and the accommodation assessment. In response to the comments relating to the ‘evidence base’, an additional appendix has been included in the ES, which sets out the assumptions underpinning the workforce analysis. See Appendix 17.2, Workforce Analysis Assumptions Log (Document 5.17.2.2).</p> |
| | <p>f. Collectively, both North Wales Connection Project and Wylfa Newydd have the potential (if effectively and proactively managed) to support Welsh language policy,</p> <p>contribute to sustainable economic growth and prosperity,</p> <p>provide growth opportunities for supply chain and other companies directly and indirectly</p> <p>and enable employment and skills pathways to be put in place to improve the talent pool and support local people to enter and progress in the labour market.</p> <p>This will be particularly so when the construction timeframes overlap, for example with the NWCP’s peak workforce occurring in Q2 2023 and Wylfa Newydd Nuclear Power Station in Q4 2023.</p> | | <p>National Grid supports Welsh Language Policy. Measures are included in the CEMP to support this.</p> <p>The Proposed Development contributes to sustainable growth by connecting a low carbon generation. National Grid is duty bound to be economic and efficient.</p> <p>Enhancement opportunities are set out in the Enhancement Strategy (Document 7.13).</p> |
| Question 1: Does the information provide sufficient detail/clarity on National Grid’s proposal/position? | <p>a. There is heavy reliance on the Wylfa Newydd Nuclear Power Station <u>Socio-economic baseline work</u>.</p> <p>IACC accepts and indeed acknowledges that cumulative impacts require cumulative solutions.</p> <p>However, in order to improve clarity, it would have been helpful for National Grid to set out the relationship between the projects at the <u>outset and how the mitigation measures will be developed and delivered individually or jointly</u>.</p> | | <p>The assessment of the Proposed Development does not rely on the Wylfa Newydd baseline, the baseline for the Proposed Development is presented in section 7 of ES Chapter 17, Socio-Economic (Document 5.17). It was agreed at the 4th thematic working group meeting that the approach taken in the assessment was acceptable, with Wylfa Newydd baseline being considered in the assessment of cumulative effects.</p> <p>Effects of the Proposed Development alone are first presented and then presented cumulatively with Wylfa Newydd.</p> |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | <p>No significant effects are predicted from Proposed Development alone and therefore no mitigation is required. Opportunities to maximise socio-economic benefits is enhancement and not mitigation.</p> <p>Enhancement opportunities are set out in the Enhancement Strategy (Document 7.13).</p> |
| | <p>b. National Grid covers the legislation and planning policy including compliance with NPS considerations (section 2) which is helpful.</p> <p>IACC notes that the Local Planning Policy section is limited to the Joint Local Development Plan for Anglesey and Gwynedd (JLDP). The Local Plan contains important strategic policies which should inform the development of the socio-economic baseline, assessment of effects, mitigation and the formal planning process.</p> <p>It is an important and relevant matter in the consent process.</p> <p>IACC would have expected relevant other policies to be identified and taken into account, for example, the Draft Gwynedd and Anglesey Well Being Plan. The analysis of relevant strategies and policies should form a key part of the socio-economic baseline tasks.</p> | | <p>Noted</p> <p>Noted</p> <p>Further work has been undertaken to ensure that all relevant plans and policies are included, including the Draft Gwynedd and Anglesey Well Being Plan.</p> |
| | <p>c. Strategic policy PS8 has direct relevance to the socio-economic and tourism assessments.</p> <p>Whilst table 17.4 sets out how the policy is considered, the consideration is limited, with reference to where the issue is to be found.</p> <p>PS8– employment and procurement for example is considered in section 9.10.</p> <p>Unfortunately, procurement is not considered at all.</p> <p>The need to understand National Grid’s procurement process, size of work packages or ‘Lots’ has been raised at the TWG meetings and is considered an important mechanism through contract clauses for contractors to maximise opportunities for local employment, training, skills, education, support for the Welsh language and supply chain development.</p> | | <p>Opportunities related to local procurement are set out in the Enhancement Strategy (Document 7.13).</p> <p>The WLIA (Document 5.26) follows different guidance to the EIA, and requires that mitigation is proposed for any impact. The only minor effect identified related to in-migration of workers. As such measures are included in the CEMP (Document 7.4) in support of the Welsh language.</p> <p>Appendix 17.2 Workforce Analysis Assumptions Log (Document 5.17.2.2) provides further detail of the nature and duration of specialist and non-specialist roles during the construction of the Proposed Development.</p> |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>d. A key outstanding issue is the identification of mitigation measures/initiatives to maximise potential benefits.</p> <p>A role of the baseline position and assessment of effects on receptors should provide evidence and advice for the <u>development of strategies e.g. employment or accommodation</u>.</p> | | <p>No significant effects are predicted for the Proposed Development therefore mitigation is not required and any strategies would be enhancement. The role of the baseline is to provide a baseline for determining likely significant effects.</p> <p>Appendix 17.2 Workforce Analysis Assumptions Log (Document 5.17.2.2) provides further detail of the nature and duration of specialist and non-specialist roles during the construction of the Proposed Development.</p> <p>Enhancement opportunities are set out in the Enhancement Strategy (Document 7.13).</p> |
| | <p>e. The assessment and mitigation related to inter-project cumulative effects (following on from the use of the Wylfa Newydd Nuclear Power Station baseline to inform the socio-economic analysis) in terms of the job, training and supply chain opportunities should be clearly set out.</p> | | <p>Having assessed the cumulative effects of Wylfa Newydd and the Proposed Development, no additional mitigation is necessary.</p> <p>Enhancement opportunities are set out in the Enhancement Strategy (Document 7.13).</p> |
| | <p>f. It is noted that the cumulative assessment is provided for Wylfa Newydd Nuclear Power Station only.</p> <p>We understand that the remaining assessment will be completed prior to final submission. Without a comprehensive cumulative assessment, there is insufficient clarity on National Grid's proposals particularly in respect of mitigation/maximising the benefits for business, people and communities of Anglesey and Gwynedd.</p> | | <p>Noted</p> <p>Having assessed the cumulative effects of Wylfa Newydd and the Proposed Development, no additional mitigation is necessary.</p> <p>Enhancement opportunities are set out in the Enhancement Strategy (Document 7.13).</p> |
| Question 2: Is the detail submitted adequate (ie, in order to make an assessment)? | <p>a. The chapter provides an overview of the assessment methodology, the basis of the assessment, and the sources of information and baseline condition as indicated in Section 4.</p> <p>However, further details are required in some areas, which has been raised previously.</p> <p>The Cumulative Impacts assessment is still to be completed.</p> | | <p>Noted</p> <p>A 'Workforce Analysis Assumptions Log' has been prepared in response to this comment (Document 5.17.2.2)</p> <p>Enhancement opportunities are set out in the Enhancement Strategy (Document 7.13).</p> <p>At the 4th thematic working group meeting in April 2018, it was confirmed that this comment relates to further investigative works such as boreholes being undertaken for the Proposed Development.</p> |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | National Grid acknowledge that further investigation will be required at specific points of interest along the cable route to provide information to undertake a more robust and thorough assessment. | | |
| Question 3: Is there anything missing? What are the gaps? Do you have any views on the impact assessment by National Grid? | a. National Grid list the ES Batch 4 caveats for Chapter 17 (dated 23rd February 2018). It is understood that the completion/updating of the outstanding work and incorporation into Chapter 17 will take place prior to the final DCO submission. The current document (which is the subject of this review) has yet to be updated. | | N/A |
| | b. A final TWG meeting has been arranged for April and it is expected that IACC will have the opportunity to consider the final draft document at or before this time (to be confirmed by National Grid). The completion of the outstanding work will provide a sounder basis on which to undertake a comprehensive review of the Socio-Economics and Tourism chapter. | | The intention of the thematic group meeting was to clarify comments rather than to provide an opportunity to review updated chapters. Points for clarification were issued to IACC in advance of the 4 th thematic working group and discussed at the meeting. |
| | c. NG has also indicated that some design and construction information may change prior to submission, although it is further acknowledged by National Grid that these changes are likely to be small. Any changes to the assessment of significant effects must be fully reported in the final ES submission. | | Noted Noted |
| | d. Other issues requiring attention: • The assessment of tunnelling/undergrounding and OHL construction covered in section 9.8 in terms of the socio-economic implications. The <u>skills required for each construction activity have not been provided</u> . For example, there may be activities which could widen the opportunities for home based workers obtaining employment or those with transferable skills. This in turn will potentially have implications for accommodation demand and supply. OHL may offer maintenance opportunities for local companies, subject to how NG will procure maintenance and other services. | | Information on the skills requirements for each construction activity is provided in Appendix 17.2, Workforce Analysis Assumptions Log (Document 5.17.2.2). Accommodation supply and demand is assessed in section 9 of Chapter 17. |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <ul style="list-style-type: none"> As set out in paragraph 7.4.40, the work associated with the Wylfa Newydd Nuclear Power Station has established a considerable number of bedspaces (in excess of 743) which could be made available under the term 'latent accommodation'. <p>Underlying assumptions about the latent category should be further clarified to ensure that the NWCP can secure sufficient bedspaces to support project delivery.</p> | | The data on latent stock was provided by IACC and has been used in both the Wylfa Newydd and the Proposed Development assessments. |
| | <ul style="list-style-type: none"> Accommodation demand is influenced by the assumptions concerning local workers. Section 4.5.52 makes clear that for the assessment, it is estimated that between 10% to 20% of jobs would be taken up by local workers and that this estimate is based on professional judgement, together with benchmarking of similar projects. <p>10% local content (which is often quoted in the chapter rather than the 10-20% range) would mean more demand for bed space accommodation with implications for the Welsh language in more rural parts of Anglesey and Gwynedd (see WLIA).</p> <p>NG should set out what measure will be put in place to ensure the 10% local content assumption is realised.</p> | | <p>The relevant (worst case) extent of the range has been assessed, dependent upon the assessment being undertaken.</p> <p>Further clarification and justification for the 10% assumption is provided in Appendix 17.2, Workforce Analysis Assumptions Log (Document 5.17.2.2), together with a sensitivity test for 0% and 20%.</p> <p>Enhancement opportunities are set out in the Enhancement Strategy (Document 7.13).</p> |
| | <ul style="list-style-type: none"> Paragraph 10.3.16 states that implementation of the Worker Accommodation Management Service (WAMS) will ensure "demand and supply can be effectively matched, and localised problems can be avoided". <p>The monitoring and response framework attached in support of this WAMS should be more fully articulated. It is imperative that the council have confidence in the mitigation measures associated with the proposals prior to DCO submission.</p> | | <p>National Grid is not relying on these mitigation proposals. The wording in the chapter has been updated to remove any confusion in this regard.</p> <p>Enhancement opportunities are set out in the Enhancement Strategy (Document 7.13).</p> |
| | <ul style="list-style-type: none"> As an example, at a minimum, IACC would suggest that NG make arrangements with WAMS operators and that NG contractors are made aware of this service through the procurement requirements, and that this is managed and monitored during construction. <p>The data could also be used to assess localised implications for Welsh Language effects.</p> | | As above |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <ul style="list-style-type: none"> A procurement strategy which sets out how goods and services will be acquired has not been provided, and Section 9.10 '<u>Wider Effects – Employment</u>' is considered to be inadequate. <p>A procurement strategy will be important for a number of reasons including demonstrating a commitment to employing local people, offering work experience and Apprenticeship opportunities through contractor obligations; and how local companies can become part of the supply chain and compete for the site preparation, security, earthworks and other non-specialist services.</p> | | <p>Appendix 17.2, Workforce Analysis Assumptions Log (Document 5.17.2.2) provides further information on the description and duration of the specialist and non-specialist roles required during construction of the Proposed Development.</p> <p>The effect on employment is assessed as not significant therefore there is no requirement for mitigation.</p> <p>Measures relating to a Procurement strategy would constitute enhancement. Enhancement opportunities are set out in the Enhancement Strategy (Document 7.13).</p> |
| | <ul style="list-style-type: none"> The skills breakdown (section 9.10.3) could also offer training and career opportunities for local people and there will be opportunities for non-specialists which should also be promoted via the brokerage. <p>With a project duration of 60 months the creation of a relatively small number of jobs and the development of training and work experience opportunities is likely to be important at a local scale.</p> <p>Progressing in employment for circa 5 years is to be welcomed and can provide new career opportunities for some, as well as creating opportunities indirectly.</p> | | <p>Enhancement opportunities are set out in the Enhancement Strategy (Document 7.13).</p> |
| Question 4: Are the mitigation proposals adequate and fit for purpose? | <p>a. No. Section 9.7 provides a 'Wider Effects' overview which includes tourism accommodation, visitor numbers, employment and expenditure and supply chain – all issues which have been discussed but not agreed at the TWG meetings. National Grid has confirmed in paragraph 9.7.2 that "no mitigation is proposed in relation to these effects, as no measures have been identified that are considered to be effective enough to confirm a reduced significance of effect". IACC would refer National Grid to the Wylfa Newydd Nuclear Power Station mitigation proposals including:</p> <ul style="list-style-type: none"> Worker accommodation - WAMS (see above); Reduced visitor numbers – the setting up of a Tourism Fund to support the Destination Anglesey Management Plan and to provide additional support to | | <p>As above, a 'workforce analysis assumptions log' is provided as an appendix to Chapter 17.</p> <p>No significant effects on tourism are identified in Chapter 17 therefore no mitigation is proposed. The measures proposed need to be proportionate to the impacts, rather than being a reflection of the measures proposed for Wylfa Newydd, a different type of project.</p> <p>Enhancement opportunities are set out in the Enhancement Strategy (Document 7.13).</p> |

| Table 1: Isle of Anglesey County Council | | | |
|---|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>boost Visit Wales's 'Wales Visitor Survey'; 'Business Barometer' as well as local accommodation assessments.</p> <ul style="list-style-type: none"> These, and any other measures considered necessary should be secured by a s106 Agreement for the National Grid project. | | |
| | <p>b. There is a heavy reliance on the Wylfa Newydd Nuclear Power Station mitigation proposals to reduce negative effects of the NWCP. It is considered reasonable that National Grid approach Horizon to participate in the mitigation schemes as a minimum (see above).</p> | | It was agreed at the 4 th thematic working group meeting that the approach taken in the assessment was acceptable, with Wylfa Newydd baseline being considered in the assessment of cumulative effects. |
| | <p>c. It is suggested that an undertaking to working in partnership with IACC and Gwynedd Council and partners to maximise opportunities for local jobs, skills and supply chain development would help to reinforce National Grid's standing in the community, generate goodwill and highlight its status as a responsible employer.</p> | | Enhancement opportunities are set out in the Enhancement Strategy (Document 7.13). |
| Question 5: Are there any changes or inconsistencies in the project detail following on from s42 or any Thematic Working Group? | <p>a. The current draft of Chapter 17 of the Environmental Statement has benefitted from some comments and responses to the consultation at Section 42.</p> <p>Further project details have been provided by National Grid, which has allowed further and more detailed assessment work to have been undertaken to understand the potential effects and assessments reported in the Chapter e.g. the skills profile of the construction workforce.</p> <p>Tables 17.6 and 17.7 set out the issues which have been taken into account and where addressed in the chapter or in other documents.</p> | | <p>Noted</p> <p>Additional skills profile information is now provided in Appendix 17.2, Workforce Analysis Assumptions Log (Document 5.17.2.2).</p> <p>Noted</p> |
| | <p>b. One issue raised at the TWG and which IACC considers that National Grid needs to address is the potential extensive use of towing caravans following the experience of the Somerset local planning authorities for the construction of the Hinkley Point C nuclear power station and the associated Connection Project and how this can be mitigated.</p> | | <p>At the 4th thematic working group on 11th April, it was clarified that the Hinkley temporary accommodation blocks were not available, and that worker uptake of PRS accommodation had already exceeded the threshold, triggering the contingency fund. Supply is insufficient for demand. This is also driving workers to bring touring caravans.</p> <p>National Grid construction workers are not yet on-site at Hinkley, therefore this point relates to the power station construction rather than OHL construction.</p> |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | Peak demand for caravan and camping accommodation for the Proposed Development is expected to be 160 workers, which would not constitute 'extensive use'. |
| | <p>c. Other outstanding areas include:</p> <ul style="list-style-type: none"> Cumulative assessment including tourism and impact of construction traffic on loss of trade; Supply chain strategy; Procurement and contractor obligations; and Implications for safeguarding Welsh language/integration of WLIA more fully | | <p>The potential for construction traffic to result in a loss of trade is assessed as part of the amenity assessment in section 9 of Chapter 17, and documented in full in Appendix 17.1 (Document 5.17.2.1).</p> <p>Over 1,000 commercial receptors were initially considered in the assessment, of which 193 were screened for detailed assessment. This included 63 tourism accommodation businesses and 130 non-tourism businesses. In the assessment, any potential for loss of trade resulting from an amenity effect is described as a secondary effect. The findings of the assessment are summarised as follows.</p> <p><u>Tourism Accommodation</u></p> <ul style="list-style-type: none"> There are no significant amenity effects on tourism accommodation businesses during construction, however there are two tourism accommodation businesses that may experience a moderate adverse secondary effect (loss of trade), resulting from visual effects. There are no significant amenity effects on tourism accommodation businesses during operation. Thirteen tourism accommodation businesses may experience a major or moderate adverse secondary effect during operation of the Proposed Development. The nature of these businesses is such that views are likely to be an important factor in the attractiveness of their 'offer'. As such, it is considered likely that they could be affected by adverse secondary effects (loss of trade). Given that there are several hundred tourism accommodation facilities listed in the Travel to Work Area (TTWA), the relatively small number of facilities affected means that the overall effect on the tourism accommodation sector in Anglesey and Gwynedd is assessed as not significant. <p><u>Non-tourism Businesses</u></p> |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | <ul style="list-style-type: none"> Out of the total of 130 non-tourism businesses considered in the assessment, only one is assessed to have a possible significant amenity effect during construction, having both a moderate adverse visual effect and a moderate adverse noise effect during construction. Given the nature of the business (vehicle hire), neither of these effects (either in combination or individually) is considered likely to lead to a significant effect on the business and no secondary effect is anticipated. During operation, there are four businesses that could be significantly affected by the Proposed Development by moderate adverse visual effects: three are automotive, and one electrical contractor. None of these businesses is considered to be sensitive to visual effects. As a result, no secondary effects are anticipated. Overall, the effects on non-tourism commercial receptors are considered to be not significant. <p>Enhancement opportunities are set out in the Enhancement Strategy (Document 7.13).</p> <p>Additional measures for mitigating in-migration effects on Welsh language have been incorporated into the CEMP (Document 7.4).</p> |
| | <p>a) It is hoped that the April meeting of TWG will clarify some of the outstanding issues identified above.</p> <p>The additional worker accommodation required by National Grid workers is in addition to that required by Wylfa Newydd which is already likely to “swamp” the private rented sector housing market.</p> <p>The local authority is extremely concerned that existing tenants, particularly those in receipt of state benefits, should not be displaced or experience difficulty in finding accommodation in an already challenging market.</p> <p>This displacement, without mitigation, will fuel the demand for all types of accommodation resulting in substandard accommodation brought back into the housing market (including un-licensed HMOs and overcrowding).</p> | | <p>Points for clarification were issued to IACC in advance of the 4th thematic working group and discussed at the meeting. The aim of the thematic working group meeting was to discuss outstanding matters relating to the assessment, rather than enhancement.</p> <p>Enhancement opportunities are set out in the Enhancement Strategy (Document 7.13).</p> <p>As a worst case it is estimated that 113 workers would take up accommodation in the PRS. According to the assessment for the Wylfa Newydd Power Station, the number of available bed spaces within the PRS is estimated to be 1,649. It is estimated that 900 workers seeking accommodation within the KSA would seek to move into private rented accommodation. The assessment concludes that the peak construction workforce could absorb around 55% of the estimated capacity within the PRS. An additional 113 workers at the</p> |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | peak of construction from Proposed Development are expected to take up bed spaces in the PRS. Based on headroom in the KSA, this would increase uptake of PRS capacity from 55% to 62%. The overall cumulative effect on the PRS is considered to be minor adverse. |
| | <p>b) IACC believes that National Grid should collaborate with Horizon Nuclear Power on its Worker Accommodation Management Service (WAMS), to be secured through a s106 agreement.</p> <p><u>This should have the flexibility to include additional large developments</u>, if they arise and must ensure that properties offered for rental through the WAMS are at the requisite market rate in order to avoid rental costs becoming inflated or unforeseen issues arising elsewhere.</p> <p>For example, the majority of caravan sites on Anglesey are seasonal and don't cover winter months. In addition, the majority of sites are for holiday use only and this usage may need a change of planning permission. The use of the WAMS service by National Grid would obviate issues such as this.</p> | | <p>National Grid has, and will continue to liaise closely with Horizon Nuclear Power. These discussions have been wide ranging and have included the potential use of Horizon's proposed Worker Accommodation Management Service (previously called the Construction Worker Accommodation Management Portal). National Grid and Horizon Nuclear Power will continue to keep this matter under review during Examination of the Projects..</p> <p>Enhancement opportunities are set out in the Enhancement Strategy (Document 7.13).</p> |
| | c) The Council's Private Sector Housing Enforcement Team should also be adequately resourced to meet increased demands and enforce Private Sector Housing Standards where necessary. National Grid could also consider incentivising landlords of large properties to adapt their properties into larger, HMO style accommodation, to accommodate workers. | | National Grid is in discussion with IACC regarding resourcing. |
| Volume 5, Chapter 18. Agriculture | | | |
| Overall conclusion of factual assessment (no other comments made): | If all works followed the codes of practice as mentioned in the document then IACC would be satisfied that the long term impact of the works on land and soil quality would be negligible (apart from the obvious visual effect). However IACC is keen to understand what remedies are in place to compensate any landowners or tenants that are adversely affected by any works that deviate from the Codes of Practice and this lack of information should be remedied by National Grid. | | Measure to ensure the appropriate and effective reinstatement of agricultural land are included in the CEMP (Document 7.4) and the |

| Table 1: Isle of Anglesey County Council | | | |
|---|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | In terms of the proposed reinstatement requirement (where the land is only used temporarily) IACC considers that this should be amended to have a requirement for pre-entry survey to be agreed by the landowner/land agent and National Grid. | | CEMP measure R2 states (Document 7.4): 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. Additionally, it has been agreed with the Welsh Government that a programme of pre-commencement planning surveys for soils and agricultural land use will be undertaken, where required, Chapter 18, Agriculture (Document 5.18). |
| Volume 5, Chapter 19. Intra-Project Effects | | | |
| Overall conclusion of factual assessment | a) Table 3 / section 5 starting on page 291 (note it ought to be section 6). No assessment of intra-project effects has been carried out and accordingly IACC reserves its position in respect of this chapter entirely until the assessment it is purporting to provide is carried out and shared with IACC for its comments. | | Noted; however it has not been possible to share the updated assessment in advance of the submission. |
| | b) The screening out of subject areas is not considered appropriate in all cases. There are concerns around the scoping out of Chapter 10 Historic Environment, particularly in relation to Landscape and Visual impacts. | | The purpose of Chapter 19 is to consider intra-project cumulative effects on receptors that are identified in more than one chapter, to consider if the multiple sources of effect could lead to a cumulative effect. Historic environment assets are not a receptor of the landscape and visual assessment. Chapter 10 Historic Environment (Document 5.10) draws on the findings of those assessments when considering potential effects on the setting of historic assets. The effect on setting is therefore fully resolved within the chapter, and it therefore does not need consideration in Chapter 19 Intra-Project Cumulative Effects (Document 5.19). |
| | c) The screening out of Chapter 11 Geology, Hydrogeology and Ground Conditions is considered to be acceptable based on information made available to IACC at this time. Where receptors are assessed in Chapter 11 the main issues include chemical spillages from plant, ground pollution from herbicides used in site clearance, import of construction materials, changes in soil structure due to compaction / erosion, disturbance of contaminated soils etc. These issues are dealt with in the CEMP (albeit without specific detail) and the residual significance is negligible. The nature of much of the route is generally benign in | | The point as raised above applies to this comment – effects on these receptors are entirely dealt with within Chapter 11 Geology, Hydrogeology and Ground Conditions (Document 5.11). |

Table 1: Isle of Anglesey County Council

| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
|---------------------------------|--|----------------|--|
| | terms of the potential for ground contamination (based on information provided by National Grid) and therefore it is clear why issues related to Chapter 11 have been screened out in Chapter 19. However, for completeness and clarity it would be helpful for National Grid to provide reiteration of the receptors, effects, residual significance and potential for intra project effects so as to provide a logical and methodical justification for screening out. | | |
| | d) The screening out of Chapter 9 (Ecology and Nature Conservation) and Chapter 17 (Socio-economics) from the Intra-Project Effects assessment is considered to be acceptable, although this is dependent on the adequacy of the assessment in each technical chapter. | | Noted |
| | e) IACC considers the methodology is suitable, however, as stated in 'caveats', the assessment not completed at this stage and IACC will not be in a position to fully respond until it has seen the complete assessment. | | Noted |
| | f) 2.1.1 IACC notes that the 2009 EIA Regulations are no longer in force. These references should be to the 2017 Regulations. All specific reference to legislation should be carefully checked to ensure accuracy. If the transitional provisions are being relied on, that should be explained. | | Based upon the transitional arrangements put in place when the 2017 Regulations were introduced, the Proposed Development falls under the 2009 EIA Regulations. |
| | g) 5.2.3 IACC does not agree as a matter of principle that it is appropriate to exclude negligible effects from this assessment of intra-project effects (with the exception of landscape and visual receptors, which are addressed below). The scale of each effect ought to be considered to determine whether or not it has the capacity to contribute, in combination with other effects caused by the project, to a significant effect on any particular receptor. A combination of negligible effects could comprise a significant effect. It is also important to note that any disputed negligible effects (where IACC does not agree with National Grid's assessment of significance) will be excluded from this assessment on this basis. IACC considers that these effects should be explored at a spatial scale that is appropriate for National Grid. | | <p>The EIA must remain proportionate and focused on likely significant effects, not every effect. It is considered reasonable to conclude that negligible effects have no potential to create a cumulative effect.</p> <p>This approach is consistent with the approach set out in PINS Advice Note 17 which deals with inter-project cumulative effects; this states that '<i>Whilst applicants should make a genuine attempt to assess the effects arising from multiple, individually non-significant effects, the CEA should be proportionate and not be any longer than is necessary to identify and assess any likely significant cumulative effects that are material to the decision making process, rather than cataloguing every conceivable effect that might occur.</i>'</p> |
| | h) From a landscape and visual perspective, the approach taken by NG appears to be reasonable and, whilst technically not watertight, it appears to be appropriate and proportionate to the assessment as IACC recognises that detailed consideration of each individual receptor would not be proportionate. | | The Amenity Assessment provided as Appendix 17.1 (Document 5.17.2.1) to Chapter 17 Socio Economics (Document 5.17) considers the same sources of effects at a community scale. As the assessments therefore include both the individual residential |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | However, National Grid should carefully consider whether these receptors should be grouped at an appropriate spatial scale and a further screening exercise carried out at that scale in order to determine whether a collection of negligible effects may amount to a significant effect which requires assessment. | | receptors and the community scale receptors, sufficient assessment has been undertaken. |
| | i) Regarding construction noise and vibration, there is a concern that the control mechanism is heavily dependent on a Noise and Vibration Management Plan, which has yet to be shared with the Council, and an insufficiently detailed CEMP. Given the uncertainty of the effectiveness of control mechanisms, the assumption that construction related impacts would be negligible (and therefore not be considered within the assessment of Intra-Project Effects) may be flawed. As the Stage 2 assessment has yet to be completed, IACC is unable to comment further on the exclusion of potential effects from the Intra- Projects assessment at this stage. | | Noted. The Noise and Vibration Management Plan (Document 7.9) has since been prepared. |
| | j) It is considered likely that negligible effects from operational noise would combine with other negligible effects during the operational stage to result in a significant effect. It is requested that further commentary and justification is provided in the chapter for clarity. | | See above. |
| | k) 5.2.4 Bullet point one – this approach is not reasonable and is not agreed. A combination of negligible effects might be significant. In addition, here National Grid is deliberately excluding any effects which are minor in terms of dust and PM10 from the intra-project assessment. This is not justified. All "not significant" effects identified here ought to be included in the assessment of intra-project effects. | | It is the view of the air quality specialists who undertook the assessment that a finding of 'not significant' for dust and PM ₁₀ means that the impact would be of such a low level that it would have no potential to contribute to cumulative effects with other types of effect |
| | l) 5.2.4 Bullet point two - this approach is not reasonable and is not agreed. For the reasons identified above, all such emissions ought to be included in the assessment of intra-project effects. | | See above. Note that one property is identified as having a minor effect and is considered further in the assessment of inter-project effects. |
| | m) It is noted that a number of technical areas have not been included in Chapter 19 Intra Project-Effects. The Council considers it likely that there will be intra- project effects between Historic Environment and Landscape / Visual. Consequently, the Council requests that National Grid re-visits the chapter screening exercise. | | See above comments. |
| | n) The chapter provides detail on the approach to assessment and the screening of effects which is generally considered to be appropriate, however | | Noted |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | lacks detail on the assessment undertaken and mitigation proposals. It is therefore not possible to determine whether the approach taken is adequate. | | |
| Question 1: Does the information provide sufficient detail/clarity on National Gird's proposal/position? | Yes, the approach to the assessment is clearly described and accessible. | | Noted |
| Question 2: Is the detail submitted adequate (ie, in order to make an assessment)? | a) As per the 'caveats' with the issue of Batch 4, only the screening has been carried out, as the assessment will be carried out once final scheme changes have been made. This limits more meaningful commentary being made at this time. | | Noted |
| | b) The detail submitted is considered to be broadly adequate in the Landscape, Visual and Transport sections. Information on gaps is provided in response to Question 3 below. | | Noted |
| | c) It is stated in paragraph 4.1.5 that: "Where multiple sources of effects are already considered within one chapter, the findings are not repeated in this chapter, this includes Chapter 9 Ecology and Nature Conservation (Document 5.9) and Chapter 17 Socio-Economics (Document 5.17). For example, there may be many sources of effects that could affect a Site of Special Scientific Interest (SSSI); however all of these sources are already considered in ES Chapter 9." There is no further comment in respect of ecology on this chapter and this is considered to be appropriate. | | Noted |
| | d) Chapter 11 Geology, Hydrogeology and Ground Conditions has also been excluded from the assessment of intra-project effects. This is assumed to be due in part to the application of embedded mitigation measures, the CEMP and topic specific management plans e.g. waste, which we understand are intended to ensure that likely effects on common receptors are unlikely. It is noted that the assessment of intra-project cumulative effects have been considered in Chapter 11 and for soil quality (the only source) the effect has been determined to be negligible. | | Noted |
| | e) Air quality has not been considered in this chapter, which is considered to be appropriate (however it isn't referenced in paragraphs 4.13 – 4.1.5 which covers chapters which have not been included in Chapter 19). In relation to | | Air Quality has now been considered in the intra-project effects assessment. |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | receptor R5/0289, reference is made to annual mean concentrations and construction noise. It is assumed that this has been placed here in error. | | |
| Question 3: Is there anything missing? What are the gaps? Do you have any views on the impact assessment by National Grid? | a) IACC considers that there are a number of omissions in respect of Landscape and Visual and the Historic Environment. | | See above comments. |
| | b) Paragraph 4.1.3 confirms that Chapter 10 Historic Environment has not been considered in the assessment of intra-project effects. If, as described in the Landscape chapter, effects on the settings of heritage assets (e.g. Registered Parks and Gardens) are being assessed in the Historic Environment Chapter, then any relevant effect could interact with those on the Landscape, communities, businesses, etc., and should therefore be included in this assessment of intra-project cumulative effects. | | See above comments. |
| | c) It is considered necessary to also include un-mitigated short and medium term minor, moderate and major effects, not just residual effects. This will allow more transparency in tailoring mitigation for intra-project cumulative effects where appropriate and the resultant residual effects to be more clearly presented. | | The intra-project effects assessment has only considered residual effects in its assessment. The implementation of mitigation measures through design, implementation of the CEMP and bespoke mitigation measures (as described in section 9 in technical chapters (Document 5.7-5.18)) would lead to receptors experiencing residual effects. Therefore these effects are considered in the intra-project effects assessment. |
| | d) IACC does not consider the screening approach in Table 2 to be adequate. Rather, National Grid appears to have screened negligible impacts without justification. | | See above comments. |
| | e) Intra-project cumulative effects have not been assessed in Table 3 and so no comment on robustness of assessment or application of methodology can be provided. | | Noted |
| | f) In addition there are one or two inaccuracies noted as follows: <ul style="list-style-type: none"> p238 R5/02689 – construction noise description appears to apply to air quality. p239 R5/02705 - construction noise Significance of Effect missing p271 R5/08346 –Significance of Effect indicated for visual only, but Construction indicated as being taken forwards to next stage of assessment. | | The document was issued in draft, and these drafting errors have been corrected in the final version. |

| Table 1: Isle of Anglesey County Council | | | |
|---|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| Question 4: Are the mitigation proposals adequate and fit for purpose? | No, Table 2 (note that the chapter contains two 'Table 2's and that this should be amended) is incomplete, suggesting that the assessment of intra-project effects has not yet been carried out. Mitigation has therefore not been proposed and IACC is unable to comment on its adequacy at this stage. | | Noted |
| | There is no direct reference to the traffic and transport chapter and the effects of construction traffic on noise and vibrations and air quality on the receptors along traffic routes identified as part of the Construction Route Strategy. IACC request that this is included in the screening of residential effects provided in Table 2). | | Traffic routes are now included in the assessment. |
| | Reliance of noise and vibration control on NVMP which has yet to be shared means that the Council cannot comment on the adequacy of screening out of receptors. It is however considered unlikely that negligible effects from operational noise would result in a significant combined effect. | | Noted |
| | In Chapter 17, National Grid address the possible conflicts/views of a receptor by assessing the likelihood of significant effects following the identification of possible significant effects. NG also recognise that "effects on a number of low-sensitivity/importance receptors could result in an overall effect that is more significant than that assessed at an individual receptor level through a cumulative effect within a sector." For example, the importance of an individual business may be assessed as low, perhaps because the businesses only employs one or two members of staff and turnover is modest. However, if a number of similar businesses within the study area are affected, this could result in an overall significant effect on that particular sector." Professional judgement has been used to assess whether the total number of receptors affected is significant within the context of the study area as a whole, however no justification or assumptions have been provided. | | Additional commentary is provided in Chapter 17 Socio-Economics (Document 5.17) regarding the potential effects on sectors. |
| Question 5: Are there any changes or inconsistencies in the project detail following on from s42 or any Thematic Working Group? | No. | | Noted |

| Table 1: Isle of Anglesey County Council | | | |
|---|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| Volume 5, Chapter 20. Inter-Project Effects | | | |
| Overall conclusion of factual assessment | 1. There are a number of omissions in this chapter to date. Consequently, the Council is unable to form a view of the appropriateness of survey work thus far and cannot therefore have confidence in the CEMP or in the current assessment of inter-project effects. Specifically, it is expected that the cumulative effects assessment will be updated as further information is provided in advance of National Grid's submission, in particular in relation to Wylfa Newydd Power Station and the Third Menai Crossing. | | Concerning the marine environment, the cumulative effects assessment has been updated in relation to e.g. the Third Menai Crossing, however information is still limited. The assessment has been fully updated to take account of the information provided in the DCO application for Wylfa Newydd Power Station. |
| | 2. The methodology employed follows established guidance where published. For this project, professional judgement has been used in the absence of hard and robust evidence which is considered to be reasonable. Based on the incomplete assessment of cumulative effects, the information contained in the document is considered to provide insufficient detail. | | Noted |
| | 3. The traffic and transportation impacts of the North Wales Connection project and the Wylfa Newydd Nuclear Power Station are required to be assessed on a cumulative basis. This assessment should be undertaken with the information that will be submitted for the upcoming submission to allow IACC to understand the impacts on the highway network during the period of construction. IACC may look to implement traffic management measures at certain junctions during peak periods of traffic generation to ensure that the cumulative impacts are minimised, in the event of the offline highway works along the A5025 not being delivered on time. | | An assessment of impacts on users of traffic links has been presented in Chapter 13 Traffic and Transport (Document 5.13) and an assessment of effects on junctions is provided in the Transport Assessment (Document 5.13.2.1) which includes proposed mitigation. Cumulative traffic effects with Wylfa Newydd Power Station are taken into consideration in each case. |
| | 4. In relation to noise and vibration, the assessment of noise from road traffic during construction in Chapter 15 is based on changes in road traffic noise level resulting from the proposed scheme. The scale of changes applied is suitable where noise levels do not rise above a level which of itself would be considered significant. Above that level, it is industry best practice to use a smaller degree of noise increase to trigger a significant effect. This threshold was not presented in Chapter 15, probably because it is highly unlikely that the scheme alone would generate enough additional traffic on heavily trafficked roads to reach this noise threshold. However, it is possible that the level could be reached, and possibly exceeded, where construction traffic from the proposed development is | | National Grid has taken this into consideration in the final version of Chapter 15 Construction Noise (Document 5.15) by including a noise level of 63 dB LAeq,16hr (free-field level), over which a change of 1 dB would result in a medium magnitude of effect, and hence a significant effect for receptors of medium sensitivity or above. The level applied is based on the guidance in the Noise Insulation Regulations 1975 (Amended 1988). This has been considered in both the assessment of effects of the Proposed Development in isolation and the cumulative assessment of effects; though as indicated, the application of this change has only resulted in significant effects within the cumulative assessment. Further details of the change to |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | combined with that from other schemes, most notably Wylfa Newydd. The cumulative assessment should recognise this and include such a criterion. | | the assessment criteria are provided in Section 4.5 of Chapter 15. The resultant cumulative effects are presented in section 10 of Chapter 15 and in Chapter 20 Inter-Project Cumulative Effects (Document 5.20). |
| | 5. It is reasonable that for on-site construction there may be little overlap associated with the Wylfa Newydd Power Station development. Construction noise and vibration tend to be quite local effects, with the exception of blasting, impact piling, and impact breaking of contract structures / rock. These latter activities could potentially result in cumulative noise effects, but only piling has been identified for the proposed scheme in this location. The piling would only be driven piles if no significant effects were predicted, and if required by the local ground conditions. | | There is no blasting or impact breaking concrete structures/rock proposed at the Wylfa end of the Proposed Development. |
| | 6. It is also considered that cumulative vibration effects are unlikely. For on-site construction of the NWCP, the control measures are CEMP and the NVMP (noting the latter has not been received), which are relied on by NG to support a conclusion that significant effects are unlikely. Without having seen the NVMP, and based on the insufficient detail of the provisions contained in the CEMP, it is not possible for the Council to agree that the NVMP delivers the 'no significant cumulative effects' outcome at Wylfa at all times. Construction works for NG in the vicinity of the Wylfa Newydd Power Station development would be principally pylons, so impacts would be relatively short term. It would therefore be unlikely that cumulative effects would occur with on-site construction. | | Updates have been made to the CEMP (Document 7.4) and the NVMP (Document 7.9) has now been prepared. It is agreed that 'Construction works for the Proposed Development in the vicinity of the Wylfa Newydd Power Station would be principally pylons, so impacts would be relatively short term. It would therefore be unlikely that cumulative effects would occur with on-site construction.' |
| | 7. In relation to Chapter 11 Geology, Hydrogeology and Ground Conditions, it is agreed that it is only the Wylfa Newydd Power Station development which interacts directly in that there is an overlap in the pre-construction, construction and operational phases. Generally, the inter-project effects related to Chapter 11 are not significant and there are no concerns from this perspective. | | Noted |
| | 8. 1.2.2 - The 2009 EIA Regulations are no longer in force. These references should be to the 2017 Regulations. All specific reference to legislation should be carefully checked to ensure accuracy. If the transitional provisions are being relied on, that should be explained. | | As above |
| | 9. 1.1.6 - The explanation being provided for the scope of assessment in this paragraph is unclear. It appears to indicate that only singular topic-specific effects have been taken into account in the assessment of inter-project effects. | | Chapter 20 Inter Project Effects now includes an assessment of inter-project cumulative effects. |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | If that is the case that is incorrect. If there are intra-project effects (of either the NWCP or any other project), it is those intra-project effects which ought to be incorporated into this assessment. | | |
| | 10. The second half of this paragraph [1.1.6] indicates that the cumulative effects of this project have not been assessed together with the “Wider Works” (as defined). This approach is illogical and is not accepted by the Council. Whilst such effects of the Wider Works might be assessed in the subsequent chapter 21, it is the cumulative effects of the project, together with the NWCP, which ought to be assessed in this cumulative chapter on inter-project effects. Sequentially the inter-project effects ought to be assessed after the combined effects (with Wider Works), in the same way they also ought to be assessed following (and taking into account) the intra-project effects as described in the preceding paragraph. | | The assessment of combined effects with the wider works has identified that there is often little overlap in study areas, and where there is there is no potential for effects of greater significance. |
| | 11. 3.4.2 - The Council does not agree as a matter of principle that it is appropriate to exclude negligible effects from this assessment of inter-project effects. The scale of each effect ought to be considered to determine whether or not it has the capacity to contribute, in combination with other effects from other projects (or other effects arising from the same project), to a significant effect on any particular receptor. A combination of negligible effects could comprise a significant effect. It is also important to note that any disputed negligible effects (where IACC does not agree with National Grid's assessment of significance) would be excluded from this assessment on this basis, which IACC considers lacks the transparency necessary for a project such as this. | | See previous comments. |
| | 12. The purpose of a cumulative assessment is to guard against an accumulation of negligible effects producing a significant impact and therefore the number and magnitude of impacts needs to be considered before they are ruled out. The proposed National Grid scheme and other development impacts should be approached in the same way where there is a likelihood for cumulative effect. IACC has concerns associated with the methodology proposed, as demonstrated by the following examples: i. As stated in IACC's response to Batch 3, there are various examples throughout Chapter 9 (Ecology and Nature Conservation) where National Grid use a methodology that does not follow CIEEM guidance. This appears to understate impacts, for example despite significant losses of an ancient woodlands CWS (irreplaceable habitat) at Gylched Covert, this is only assessed | | The EIA must remain proportionate and focused on likely significant effects, not every effect. It is considered reasonable to conclude that negligible effects have no potential to create a cumulative effect. This approach is consistent with the approach set out in PINS Advice Note 17 which deals with inter-project cumulative effects; this states that ' <i>Whilst applicants should make a genuine attempt to assess the effects arising from multiple, individually non-significant effects, the CEA should be proportionate and not be any longer than is necessary to identify and assess any likely significant cumulative effects that are material to the decision making process, rather than cataloguing every conceivable effect that might occur.</i> ' |

Table 1: Isle of Anglesey County Council

| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
|---------------------------------|--|----------------|--|
| | <p>to be moderate sensitivity with a low effect overall. This seems optimistic given potential effects during both construction and operation.</p> <p>ii. As stated in our response to Batch 3, there are a number of areas associated with Chapter 15 Air Quality whereby the methodology and thus assumed significance of effects is not clear. For example, the Council considers that construction receptors situated 50m from the site boundary should be included or at least justified, in accordance with the Institute of Air Quality Management's 2014 guidance.</p> <p>iii. There are also a number of areas in Chapter 14 Traffic and Transport where the assessment of sensitivity is not deemed to be appropriate, as set out in the Council's response to Batch 2. There are a number of assumed link sensitivities due to the presence of primary schools, a children's play area and a nursing home. For example, Link Ref 22: Ysgol Y Graig and Coleg Menai – in which IACC previously requested an alternative route should be considered - should be considered as having a 'High' sensitivity (National Grid assessed this as 'medium').</p> <p>iv. As stated in IACC's response to Chapter 17 above, in the absence of robust verifiable evidence, we note that National Grid has had to resort to 'professional judgement'. The nature of socio-economic assessment, analysis and forecasting means that where hard evidence cannot be obtained or used, it is imperative that the assumptions behind analyses are clearly set out, comparators are used where appropriate and the draft outputs are scrutinised and challenged for robustness. This has not been provided to date, which makes it difficult for the Council to comment on adequacy of cumulative effects associated with socio- economics. Further table 20.13 has yet to be completed.</p> <p>v. In addition, in relation to the Wylfa Nuclear Power Station Decommissioning, the summary of Stage 1 and 2 (Table 20.5) states that "The peak construction period for the Proposed Development is anticipated to occur after completion of this decommissioning scheme", thereby indicating that the traffic and transport impacts don't progress to Stage 3 / 4. This should be updated to reflect any potential changes in programme for the project.</p> <p>vi. The traffic and transportation impacts of the North Wales Connection project and the Wylfa Newydd Nuclear Power Station are required to be assessed on a cumulative basis. This assessment should be undertaken with the</p> | | <p>As and when contributing effects have been identified they have included within Chapter 20. Comments i, ii, iii and iv are covered by the relevant topics.</p> <p>The assessment has been updated to allow for potential changes in programme.</p> <p>An assessment of impacts on users of traffic links has been presented in Chapter 13 Traffic and Transport (Document 5.13) and an assessment of effects on junctions is provided in the Transport Assessment (Document 5.13.2.1) which includes proposed mitigation. Cumulative traffic effects with Wylfa Newydd Power Station are taken into consideration in each case.</p> |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | information that will be submitted for the upcoming submission to allow IACC to understand the impacts on the highway network during the period of construction. IACC may look to implement traffic management measures at certain junctions during peak periods of traffic generation to ensure that the cumulative impacts are minimised, in the event of the offline highway works along the A5025 not being delivered on time. | | |
| | 13. It should also be noted that this paragraph is inconsistent with paragraph 3.6.4 which indicates that it is not only negligible, but in many cases minor, effects which are being screened out of the assessment on the basis of professional judgment. No measurable, quantifiable, verifiable method for this approach is being provided, which is therefore fundamentally flawed. | | Minor effects are not screened out, this paragraph highlighted that minor effects would be considered on a case by case basis. |
| | 14. 3.6.6 - The impact of individual decision-making, in a manner which is made without reference to any identified standard, persists in the methodology outlined in table 20.3 at paragraph 3.6.6. In particular, a distinction is being made between a "high level" minor effect (see row 3 column 4) and a "low level" minor effect (row 6 column 4). This appears to be an arbitrary distinction, made without reference to any objective standard, and without any previous explanation in National Grid's methodology. | | There are no 'identified' or 'objective' standards for intra project cumulative effects that National Grid is aware of. In all cases professional judgement is essential, as the effects are of different types and cannot simply be added together. The wording in the table has been updated. |
| | 15. Table 20.5 - IACC notes that this table will need to be kept under review and updated prior to submission of National Grid's application. | | Noted |
| | 16. Tables 20.6 to 20.14 - It does not appear that the residual cumulative effect column has been completed. This is clearly a fundamental omission in this draft assessment and IACC reserves its position in respect of this chapter entirely until the assessment it is purporting to provide is carried out and shared with IACC for its comments. It is also noted that section 4.3 (summary) has not yet been completed. It is expected that the CEA will be updated to include description of effects resulting from each development, and shared with the Council in advance of DCO submission. | | The chapter has been fully updated since issue of the draft. |
| | 17. The screening out of impacts associated with Chapter 11 Geology, Hydrogeology and Ground Conditions is considered to be acceptable, although it would be helpful if NG provided further commentary to justify this decision. | | Noted |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | 18. Construction noise appears to be a potential source of cumulative effect, and it is not sufficient that the assessment is limited to traffic only. This is likely to be due to the separation between the actual worksites. The only worksite where it is anticipated that there could be cumulative effects would be at Pentir, and this can not be clarified without some outline idea of the proposals for the wider works which the Council has yet to see. As for other construction sites, reliance will be placed on the CEMP and NVMP to achieve the outcomes, and previous concerns regarding this apply. | | Construction noise is not limited to traffic only. Please refer to Chapter 15 Construction Noise (Document 5.15) for further information. |
| | 19. Reference to socio-economic effects associated with the wider works is limited in the chapter and does not cover the effects set out in Section 9 of Chapter 17. It is not clear whether this should be the case. | | Where a receptor does not appear in this assessment it is because there is no potential for cumulative effects. |
| | 20. The Council is unable to comment on adequacy of mitigation as this has yet to be completed by National Grid. | | Noted |
| | 21. The Council expects that this chapter will be updated as further assessment information on the Horizon Nuclear Power development becomes available. Traffic data for each scheme, in particular, is considered to be of importance to the cumulative impact assessment and the lack of this information has reduced the Council's capacity to comment on adequacy. | | This chapter, Chapter 13 Traffic and Transport (Document 5.13), and the TA (Document 5.13.2.1) have all been updated to reflect the Wylfa Newydd Power Station Project as applied for. |
| Question 1: Does the information provide sufficient detail/clarity on National Grid's proposal/position? | a. The approach to the inter-project effects assessment has been set out in Paragraph 3.2.2 which includes Stage 1) to establish the 'zone of influence' for each topic and identify a list of developments Stage 2) to set criteria for inclusion / exclusion of developments Stage 3) to gather information about shortlisted developments Stage 4) to undertake a Cumulative Effects Assessment (CEA). | | Noted |
| | b. National Grid's suggested methodology is that if the impact of the proposed development (NWCP) is negligible, the potential for cumulative effects is prejudged to be zero, no matter what the significance of impact from the other developments. Table 20.3 does not treat (or implies it does not treat) impacts from the proposed and other developments in the same way. This fails to recognise the potential additive effects associated with multiple schemes (individually potentially giving rise to less profound effects) combining at a community or receptor level to give more profound or significant effects. | | See previous comments. |
| | c. The purpose of a cumulative assessment is to guard against an accumulation of negligible effects producing a significant impact and therefore | | See previous comments. |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | the number and magnitude of impacts needs to be considered before they are ruled out. The proposed National Grid scheme and other development impacts should be approached in the same way where there is a likelihood for cumulative effect. | | |
| Question 2: Is the detail submitted adequate (ie, in order to make an assessment)? | <ul style="list-style-type: none"> Ecology <ul style="list-style-type: none"> a. The ecology chapter of the ES contains a cumulative impact assessment, and this chapter simply draws across summaries from that chapter. Thus, our specific comments on the ecology chapter provided at Batch 3 should be considered here but are summarised below: <ul style="list-style-type: none"> i. In Table 20.8 there are numerous examples of where the assessment states that where no significant effect is predicted from the NWCP, alongside another “no significant effect” on the same receptor from another project, these cannot together create a significant cumulative impact. This is not the case and each such effect should be looked at in detail to consider if together they could raise the overall level of impact to a level that could be significant, for example Ancient Woodland at Wylfa. This has a consequence for transparency in assessment of the effect and also in developing the appropriate mitigation. ii. Table 20.8 states on p46 that there will be no overlap with site clearance for Wylfa that will start in January 2018 and continue to April 2019. It is unclear whether National Grid should revisit this conclusion given the attendant delays to the projects considered in cumulative terms. iii. Table 20.8: Rhyd-y-Groes Re-Power (p48): There is no discussion on cumulative collision risk for avian species using Llyn Alaw, including whooper swan. | | <p>The cumulative assessment takes this approach when one or other of the effects alone is negligible, as it is not considered likely that negligible effects could generate a cumulative effect, given that they are ‘barely perceptible’. This approach is not taken where it is simply ‘not significant’ as it is recognised that there is a potential for two minor effects to have a significant cumulative effect.</p> <p>The cumulative effects section has been updated with the latest published information for the Wylfa Newydd Power Station.</p> <p>See previous comments in relation to Rhyd-y-Groes Re-Power. Note: number of flights and individuals recorded passing through the collision risk area for Rhyd-y-Groes Re-power did not identify whooper swan and therefore this species was not included in the assessment.</p> |
| | <p>Landscape and visual</p> <ul style="list-style-type: none"> Tables 20.6 and 20.7 are largely incomplete therefore meaningful commentary is not possible. It is not clear how the CEA has been judged without any description of the effects resulting from each development. | | Noted. These have been updated in the final chapter. |
| | <p>Transport</p> <ul style="list-style-type: none"> a. As discussed at the TWG meeting on 8th March, National Grid will be updating the transport chapters and associated information based on updated | | Noted. These have been updated in the final chapter. The cumulative effects section has been updated with the latest information on Wylfa |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>Horizon Nuclear Power DCO application documents. The Inter-Project cumulative impacts should be reviewed using an updated programme of works for the Horizon and the National Grid programmes, as any changes to Horizon's works are likely to have implications for the National Grid programme.</p> <p>b. As discussed at the TWG meeting, IACC will seek to implement a cap on HGVs routeing through the Valley junction to address potential issues of delivery of the off-line works along the A5025. This process is on-going and IACC will be discussing this with Horizon and National Grid to set the parameters for this assessment.</p> | | Newydd Power Station programme which was not available when the draft chapter was written. |
| | <p>Noise</p> <p>a. Table 20.11 Construction Noise (p68) – the following comments apply to the 'Proposed mitigation applicable...' for Wylfa Decommissioning assessment. IACC is aware that one of the three transformers at Wylfa Sub-station is noisier than the others. National Grid intend to reduce the number of transformers to two but intend to leave the noisier transformer. IACC believe that National Grid should take this opportunity to replace the noisier transformer as part of a wider community mitigation scheme. Reference is made in Chapter 20 to construction noise limits as mitigation, leading to conclusion that no other specific mitigation other than covered by the CEMP is required.</p> <p>b. IACC's view is that construction noise limits will not be of assistance in control where the source is road traffic noise from construction vehicles on the highway. Realistic mitigation is (1) enforcement of construction vehicle routes which minimise impacts (2) off-site mitigation via legal agreement to provide noise insulation for affected properties.</p> <p>c. From the assessment of effects, it seems unlikely that increases in traffic noise would be sufficiently severe to trigger the need for off-site mitigation (although this is not certain). However, it is possible that, on roads already subject to high volumes of traffic, the addition of construction vehicles (either from NG development alone or cumulatively with that from other developments) could produce an absolute noise level which of itself could constitute a significant effect. IACC would like to see NG screen their road traffic noise predictions and explicitly identify any that see an increase in level due to developments which reaches or exceeds 66dBLAeq(16 hour) (façade level).</p> | | <p>The transformers do not form part of the Proposed Development.</p> <p>As previously stated, the cumulative effects assessment in terms of the marine environment has been updated in relation to e.g. the Third Menai Crossing.</p> <p>Chapter 20 has been extensively updated since the draft version was issued.</p> <p>It is correct to state that alone the Proposed Development does not have any significant effects in relation to construction traffic. There are potentially significant cumulative effects with Wylfa Newydd, with that development having the largest proportion of contribution, and reporting a moderate adverse effect alone. The Wylfa Newydd Power Station ES has taken a different approach to the definition of inter-project cumulative effects; it states that that 'With the addition of National Grid traffic, the cumulative effect is a total increase of 31%. In 2023, this represents a significant effect on the A5025 only but is not materially different from the assessment in chapter C2 (moderate adverse).'</p> |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>d. IACC considers that National Grid should update Chapter 20 to provide more detailed information in order to give the Council confidence in the assessment undertaken. It is not currently clear what the traffic and transport impacts (and thus air quality, noise and vibration impacts) arising from the development will be.</p> <p>e. The inclusion of the Third Menai Crossing proposal in the cumulative assessment is welcomed. The Wylfa Newydd Power Station and Third Menai Crossing developments are likely to influence the economy over the long term and it is appropriate to consider the National Grid proposals in the context of these schemes. Whilst it is noted that the proposals for the Menai crossing are at a preliminary stage, no details have been provided for ID 13 in Table 20.5 on the scale and nature likely to have an effect. It is expected that this will be updated as the proposals progress.</p> | | |
| Question 3: Is there anything missing? What are the gaps? Do you have any views on the impact assessment by National Grid? | a. The assessment and mitigation proposals are largely incomplete. For example, National Grid has not commented on whether there are any residual effects associated with each receptor and have provided limited mitigation proposals in relation to the Proposed Development. | | Chapter 20 has been extensively updated since the draft version was issued, which was acknowledged as incomplete. |
| | b. It is also expected that this chapter, in particular Table 20.5, will be updated following further up to date information from the Horizon proposals. | | Chapter 20 has been extensively updated since the draft version was issued, which was acknowledged as incomplete. This has included an update to take account of the Wylfa Newydd Power Station application. |
| | <p>c. The chapter should be updated (see comment (d) above).</p> <p>I. Consistency of information is required for the socio-economic consideration, including: Consistency in reporting development timeframes – start and finish dates so comparison can be made with other projects and demand for labour understood more easily</p> <p>II. Understanding on the cumulative assessment methodology and any assumptions behind the model which may have been adopted from Horizon</p> <p>III. An assessment of the combined social and community effects – the impact of the influx of workers on “blue light” services, particularly at “peak”.</p> | | Chapter 20 has been extensively updated since the draft version was issued, which was acknowledged as incomplete. This has included an update to take account of the Wylfa Newydd Power Station application. |

| Table 1: Isle of Anglesey County Council | | | |
|---|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| Question 4: Are the mitigation proposals adequate and fit for purpose? | The mitigation proposals are incomplete as National Grid has not proposed any mitigation associated with the Proposed Development. The relatively small numbers of socio-economic benefits and impacts identified by National Grid is insufficient justification not to put forward mitigation proposals and other measures to maximise benefits from the scheme over the 60-month development period. This approach does not align with the JLDP Strategic Policy PS 8 (Proposals for national significant infrastructure projects and related developments). | | Enhancement opportunities are identified in the Enhancement Strategy (Document 7.13) |
| Question 5: Are there any changes or inconsistencies in the project detail following on from s42 or any Thematic Working Group? | No cumulative assessment provided prior to receipt of this chapter at this stage. | | Noted |
| Volume 5, Chapter 21. Combined Effects | | | |
| Overall conclusion of factual assessment | 1.1.2 - In respect of this section, further information would provide the Council with confidence in the assessment undertaken – see detailed comments below. Paragraph 3.3.1 states that “a range of vehicles would be accessing the site including concrete lorries, Heavy Good Vehicles (HGVs), articulated lorries and one Abnormal Indivisible Load (AIL) carrying the transformer.” Table 21.8 also makes reference to traffic numbers e.g. “Even though the Glaslyn Cables work would lead to a slightly higher traffic numbers.” The traffic generated by each of the Wider Works has not been provided in the document. Consequently, IACC is not currently in a position to fully determine the impacts these could have on the significance of effects in relation to both traffic and transport and noise | | Indicative forecast vehicle movements per day have been included in the Wider Works descriptions within the chapter. |
| | 1.1.3 - Comments have been made on chapter 20 above, in respect of the sequential sequence in which assessments of in-combination, and then cumulative inter-project, effects, ought to be made. This paragraph (1.1.3) would be accurate if National Grid had in fact properly assessed in- combination (including intra-project in combination) effects, and there after inter-project cumulative effects. However, it appears to have assessed only single-topic issues as part of its inter-project effects. It also appears to have excluded in combination effects from the assessment of cumulative inter- project effects. | | Intra-project combined effects are included in the Chapter. These effects have been used to inform the Inter-project effects reported in Chapter 20. |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | Section 3 - If the assessment of in combination effects is based on the construction programme provided, what certainty can IACC and PINS have that these will be reflected at the point of construction? The appropriate way to manage this would be to have an agreed phasing programme approved by the local planning authorities, taking into account the intended sequencing of the wider works. National Grid's assessment of likely significant effects, including its summary at 4.3, relies heavily on the limited period during which an overlap in construction programmes are expected to take place. It is critical that a control is in place to secure this, if it is being relied on in National Grid's assessments. | | The assessment of combined effects has concluded an increase in the significance reported for the Proposed Development alone based on the distance between the main works and the Wider Works rather than the construction programme. |
| | Table 21.8, pages 21 and 22 - In respect of both landscape and visual effects (and others following in the table), it is said there is "little likelihood" that maintenance works will be carried out. As National Grid will be aware, the purpose of EIA is to assess the likely significant effects of a proposal on the environment. Likely in that context does not mean whether one scenario is more likely than another. It means that any scenario which has a real prospect of occurring must be assessed for its impacts on the environment. If combined effects which would amount to a significant effect may occur, they must be assessed, which at present National Grid's assessment fails to do so. | | The chapter has been updated to assess maintenance taking place simultaneously. |
| | In addition, there are areas where further information could be provided in order to enable IACC to understand the likely impacts, and the mitigation required as a consequence. It is expected that this will be covered in the planning applications associated with the wider works, however as there is the potential for cumulative effects to occur it is expected that information will be provided as part of the NWCP application to ensure that these are mitigated. | | The assessment of Combined Effects takes into account all information currently available regarding the Wider Works. |
| Question 1: Does the information provide sufficient detail/clarity on National Grid's proposal/position? | There is a lack of detail provided in relation to the likely effects of the wider works. Although paragraph 1.1.2 confirms that the works will form part of separate planning consents, it is expected that further information will be submitted as part of the DCO application and an adequate assessment of combined effects undertaken, particularly in relation to traffic and transport. This is deemed reasonable insofar as there is a clear relationship between the works within the DCO and the wider works. | | The assessment of Combined Effects takes into account all information currently available regarding the Wider Works. |
| Question 2: Is the detail submitted adequate (ie, | Ecology a. Table 21.8 identifies a temporary combined effect of the project plus reconductoring of the 4ZC cables around the Pentir substation; the text states | | Assessment has been updated. |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| in order to make an assessment)? | that these could affect mobile receptors, such as birds. All other elements of wider works are scoped out based on separation distances. However, the text also mentions the reconductoring will include temporary land take so there could be habitat impacts as well as faunal effect (as stated later in 4.3.3). | | |
| | b. 4.3.3 summarises combined effects and states: "Temporary combined effects on more mobile species through temporary habitat loss could theoretically occur during construction, as the reconductoring of 4ZC is 4 km away from Pentir, however the probability of combined effects occurring, and being more significant than each element of work alone, is considered to be very low". This is considered reasonable and the Council assumes that any effects on ecological receptors will be adequately assessed as part of the wider works project(s) individually as these do not form part of the DCO application for the NWCP as confirmed in 1.1.2. | | Noted |
| | c. Note that this chapter refers to Figure 21.1 (Document 5.21.1.1); this illustrates the positions of the wider works, but it would seem we have not received this from National Grid. This has hindered review due to reliance on words in the text that suggest geographical separation exists. | | This figure is provided with the final version of the chapter. |
| | Geology, Hydrogeology and Ground Conditions • The screening assessment has concluded that there are combined receptors with all topic areas except for two, one being Geology, Hydrogeology and Ground Conditions. This would appear reasonable and is reflected in Table 21.7. | | Noted |
| | Landscape and Visual • The assessment is high level but appears to be broadly adequate. | | Noted |
| | Transport a. Paragraph 3.3.1 states that "Prior to the main construction works, access to the site would be constructed off the A487. During construction, a range of vehicles would be accessing the site including concrete lorries, Heavy Good Vehicles (HGVs), articulated lorries and one Abnormal Indivisible Load (AIL) carrying the transformer". Information has not been provided in relation to the number of workers or how much traffic is likely to be generated. The Council | | The assessment of Combined Effects takes into account all traffic information currently available regarding the Wider Works. |

| Table 1: Isle of Anglesey County Council | | | |
|---|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | seeks clarification to ensure the cumulative impacts of this and the wider National Grid works are considered. | | |
| | b. Paragraph 3.3.2 states that "A temporary construction compound would be established adjacent to the proposed substation to allow for the safe construction of the permanent operational substation high voltage compound. The construction compound area generally would comprise temporary cabins for offices and for welfare facilities for construction site workers. There also would be allocated areas for receiving deliveries, for storage of materials and equipment and (where required) for storage of waste items to be removed". The Council seeks clarification on the amount of workers that Bryncir Substation will generate and what the measures are to ensure issues are not created from worker parking. | | The description of the construction phase of Bryncir has been updated to provide indicative worker numbers. Parking would be within the construction compound. |
| Question 3: Is there anything missing? What are the gaps? Do you have any views on the impact assessment by National Grid? | The following information is considered to be missing: o Quantification of traffic generation, worker profile and car parking information | | The assessment of Combined Effects takes into account all information currently available regarding the Wider Works. The descriptions have been updated where more information is available. |
| Question 4: Are the mitigation proposals adequate and fit for purpose? | No mitigation is proposed as part of this chapter. | | Noted |
| Question 5: Are there any changes or inconsistencies in the project detail following on from s42 or any Thematic Working Group? | No. | | Noted |
| Volume 5, Document 5.23, No Significant Effects Report | | | |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| Overall conclusion of factual assessment: | As this is the first opportunity IACC has been offered to comment on the NSER, it is suggested that discussion is had with NRW who have previously commented on drafts of this document to explore any areas of joint concern before completing the SoCG process. | | Noted; however it should be noted that the NSER is now an HRA Report (Document 5.23) in response to recent case law relating to consideration of mitigation at the HRA screening stage. |
| | In general, the NSER covers the range of European Sites expected, using zones of influence that appear adequate for the receptors present. | | Noted; however it should be noted that the NSER is now an HRA Report (Document 5.23) in response to recent case law relating to consideration of mitigation at the HRA screening stage. |
| | The methodology for assessing NSE appears adequate, following accepted guidance for this type of assessment. | | Noted; however it should be noted that the NSER is now an HRA Report (Document 5.23) in response to recent case law relating to consideration of mitigation at the HRA screening stage. |
| | There are a number of potential inconsistencies and applications of approach in places where specific comments have been made. | | The draft document has been updated to remove potential inconsistencies and applications of approach. |
| | Embedded mitigation is presented, but lack details in key areas, notably the Drainage Management Plan and associated information that will be required to ensure water quality effects are controlled around the Anglesey Fens SAC / Anglesey and Llyn Fens Ramsar Site. | | The requirement for a drainage management plan is set out in section 8 of the CEMP (Document 7.4). This is secured by Requirement 6 of the draft DCO (Document 2.1). |
| | The approach to in-combination assessment appears incorrect, relying on spatial overlap only between projects. | | The in-combination assessment presented in section 8 of the HRA Report (Document 5.23) considered whether there is a spatial overlap of the study areas (zones of influence) for Natura 2000 sites between the Proposed Development and the other developments considered in the in-combination assessment. |
| Question 1: Does the information provide sufficient detail/clarity on National Grid's proposal/position? | The proposals for the NWCP are set out in this and related documents, including construction, operation, maintenance and decommissioning information; therefore these are considered adequate to allow effects on European Sites (SPA, pSPA, SAC, cSAC and Ramsar sites) to be assessed later in the NSER report. | | Noted; however it should be noted that the NSER is now an HRA Report (Document 5.23) in response to recent case law relating to consideration of mitigation at the HRA screening stage. |
| Question 2: Is the detail submitted adequate (ie, | It should be noted that this is the first opportunity IACC has had to view the draft NSER; as detailed in 1.6.1, a draft of this NSER was not available at the time of the Section 42 consultation. It is helpful that National Grid has included HRA related responses that IACC and other parties made within Table 1.1 as part of | | Noted; however it should be noted that the NSER is now an HRA Report (Document 5.23) in response to recent case law relating to consideration of mitigation at the HRA screening stage. |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| in order to make an assessment)? | Section 42 consultation, but it IACC notes that to date National Grid has only shared a draft of the NSER with NRW. | | |
| | Overall, the NSER covers the expected European Sites and assessed effects, alone and in combination as expected. The zones of influence appear correct when considering potential receptors and pathways for effect. | | Noted; however it should be noted that the NSER is now an HRA Report (Document 5.23) in response to recent case law relating to consideration of mitigation at the HRA screening stage. |
| | However, as detailed in comments in subsequent sections of this document review form, there are some areas of potential weakness, centred around lack of detail provided around mitigation measures along with some methodological / consistency matters that should be discussed with NRW and National Grid. | | All mitigation measures relied on are secured by the draft DCO (Document 2.1). The draft document has been updated to remove potential inconsistencies and applications of approach. |
| | The approach to in-combination assessment appears incorrect, relying on spatial overlap only between projects. | | The HRA Report (Document 5.23) considers whether there is a spatial overlap of the study areas (zones of influence) for Natura 2000 sites between the Proposed Development and the other developments considered in the in-combination assessment. |
| Question 3: Is there anything missing? What are the gaps? Do you have any views on the impact assessment by National Grid? | The following are a list of observations on the NSER where it is considered clarifications are required or further information should be supplied: | | Noted |
| | Section 1.5.10: This appears to be extraneous text that could be removed. | | This wording has been removed. |
| | Table 1.1, p3: The INNSMS should be available now; relying on this to be delivered at some future date as part of the CEMP (which is in itself too generic and lacking detail, see later comments) adds uncertainty and areas of potential challenge to the conclusions of the NSER. Moreover, at present the CEMP requirement of the DCO does not provide a future approval of the CEMP beyond examination (other than to be certified by the SoS). There is therefore a missing layer of control on the approval of the INNSMS. The CEMP requirement ought to be amended such that the final version of the CEMP (including the INNSMS) is amended to be approved by the relevant LPA (in consultation with NRW) prior to commencement of the development. | | Section 10 of the CEMP (Document 7.4) requires an Invasive Non-Native Species Method Statement (INNSMS) to be produced in line with the Outline INNSMS (which includes a Biosecurity Risk Assessment (BRA)) as set out in the Biodiversity Mitigation Strategy (Document 7.7). |
| | Table 1.1. "10.1 Menai Strait & Conwy Bay SAC" entry page 5 – here NRW are asking for a plan containing detailed mitigation measures to prevent significant effects on the SAC. NGET's response does not address that request, and this plan appears to be currently missing. IACC considers that it should be added. | | All mitigation measures relied on are secured by the draft DCO (Document 2.1). The draft document has been updated to remove potential inconsistencies and applications of approach. |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | Table 1.1, p7: Regarding 10.1 Anglesey Valley Fens SAC and Anglesey and Llyn Fens Ramsar, it would appear that NRW are asking for a Drainage Management Plan containing detailed mitigation measures to prevent significant effects on the site. National Grid's response does not address that request, and this plan appears to be currently missing. The CEMP does not provide the level of detail NRW appear to be asking for. | | The requirement of a drainage management plan is set out in section 8 of the CEMP (Document 7.4). This is secured by Requirement 6 of the draft DCO (Document 2.1). |
| | 3.3.4 The drafting of the final line indicates the proposed development is only located in the upland fringes of Snowdonia. That of course is not the case, and this ought to be amended | | Noted; text has been amended for clarity |
| | 3.7 and 4.2.102: Although the NSER states 206,880 tonnes of arisings will be produced from tunnel works, the disposal or reuse of this significant amount of material is not covered in detail; if all is simply to be taken away by road this should be stated and confirmation provided that air quality, noise and wider environmental effects associated with the disposal have been taken into account for both scenarios (arisings generated in either Anglesey or Gwynedd). | | The assessment of air quality and noise effects takes into account the tunnel arisings being transported from site to the strategic road network. |
| | 4.2.99 The reference (at line 11 onwards) to the ability to reuse the natural rock or substrate excavated as part of the tunnel construction reinforces the suggestion that the tunnel works ought to take place sufficiently early in the scheme of works to allow all such material to be reused as part of the proposed development. Related to the point above, if excavated natural rock is to be reused, details of what this will involve, including locations and timings need to be clarified. | | Tunnelling works are programmed in first. National Grid has included the opportunity for reuse of the material but this is not relied upon therefore any use would be a betterment. National Grid has also included the process in the CEMP to test the material before it is reused (Document 7.4). |
| | 4.2.129, bullet point 6 under sub-heading "placing the overhead line underground" refers to works by third parties being carried out in accordance with standard soil management and safety requirements. Why is it not considered necessary for these third party works to be subject to the controls of the CEMP? NGET ought to be securing third party compliance to those standards on a uniform basis across the proposed development. | | Third party works would be undertaken in accordance with CEMP (Document 7.4) subject to paragraph 3 of Requirement 6 of the draft DCO (Document 2.1). |
| | Table 4.4. page 104 contains NGET's proposed "stages" of the works as identified within the staging requirements. No flexibility (see table 5.1) appears to have been allowed to those stages (other than the scenarios considered at 5.2.7) and IACC therefore expects NG to amend the drafting of its "stages" requirement to reflect that this staged construction programme must be the one | | Requirement 5 of the draft DCO (Document 2.1) states that 'The authorised development may not commence until a written scheme setting out all stages of the authorised development has been submitted to the relevant planning authority'. Consideration has been given to the effects of reasonable increases in programme duration |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | followed by NG. In the case of likely significant effects on Habitats protected sites and species, it does not appear that any other sequence of works has been assessed. | | and commencement year and if effects would be any different this is identified in the technical chapters (Document 5.7 to 5.18). |
| | Table 5.1: We take it that National Grid has assumed habitats, where pylon footprints will be located outside the SAC boundary, are not contributing habitat to main site features and on this basis National Grid has excluded them in this table; agreement on this approach should be sought and confirmed as acceptable with NRW. | | All pylon footprints would be located outside of the SAC boundary. |
| | Table 5.2: It is unclear why the different scenarios around the A5025 alignments which would not alter NSER assessments is required here; if this relates to air quality distance effects, this should be inserted here. | | Section 5 of the HRA report (Document 5.23) sets out how the flexibility afforded by the DCO has been taken into account. |
| | 6.3.5: This refers to DCO Requirement 8 imposing a control relating to the Schedule of Environmental Commitments. This was not within the DCO issued to IACC as part of batch 2. | | The Schedule of Environmental Commitments (Document 7.4.2.1) forms part of the CEMP which is secured through Requirement 6 of the draft DCO (Document 2.1). |
| | <p>Table 6.1: Regarding operational phase loss of habitat / fragmentation effects, this states:</p> <p>The Proposed Development could result in loss or fragmentation of supporting habitat during operation. However due to the small permanent area of habitat affected the Proposed Development would not result in the significant direct loss or fragmentation of supporting habitat during the operation of the Proposed Development.</p> <p>This appears to say there could be an effect, but this will not be significant, thus 'No' is selected in the right hand column. However, we assume that at this stage of the assessment, the purpose of this table is to simply identify potential for effect, rather than to determine if this is significant. Agreement on this approach should be sought and confirmed as acceptable with NRW.</p> | | <p>Any loss would occur during the construction stage and has been assessed under that stage. Text has been amended in Table 6.1 of the HRA report (Document 5.23).</p> <p>Noted, the wording has been reviewed and amended as appropriate.</p> |
| | Table 6.2: Regarding works in the Menai Strait we note that the potential for introduction of marine INNS is ruled out as no works are planned. If there were an issue with site drilling fluid release or other construction phase problems, the Council seeks confirmation that the use of vessels would not be required. | | Section 10 of the CEMP (Document 7.4) requires an Invasive Non-Native Species Method Statement (INNSMS) to be produced in line with the Outline INNSMS (which includes a Biosecurity Risk Assessment (BRA)) as set out in the Biodiversity Mitigation Strategy (Document 7.7). |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | Table 6.2: It is not clear why disturbance effects have been scoped out for Puffin Island SPA for Cormorant, when they have been included for similar features of other SPAs, given that results show this species occupies habitats on site. Later on in the NSER there is discussion on this matter relating to core ranges, but at this stage it is considered that this effect should remain valid. | | Puffin Island has now been taken through to stage 2 for potential collision risk on Cormorant. The stage 2 assessment has concluded no adverse effect on site integrity either alone or in-combination. |
| | Table 6.2: Given the fact that the Dyfi Estuary SPA is 69.5km south of the Order Limits, it is not clear why this site is part of the assessment. IACC requests clarity on whether there is any evidence to suggest that the geese using the Dyfi Estuary use habitats within the project area at any point. | | This site is designated for Greenland White-fronted Goose which is known to utilise supporting habitat on Anglesey therefore this site has been considered within this assessment. |
| | Table 6.4 (p264): This states that the macroinvertebrate surveys did not record Geyer's whorl snail. It should be noted that no dedicated surveys for this species were undertaken and it is assumed unlikely that this tiny species would be adequately captured by conventional survey methods, so limited reliance should be based on such statements. | | This species have very specific habitat requirements that are not present in the Order Limits within this area, in addition records are present greater than 800 m away and most at greater distances. Further detail has been added to section 9, of chapter 9 Ecology and Nature Conservation (Document 5.9). |
| | Table 6.4 (p318): We note that reef habitat has been excluded from consideration of effect from release of drilling fluid, yet is included for mudflat and sand flat habitats within the Menai Strait and Conwy Bay SAC. IACC requests justification for this, as this habitat occurs within the Order Limits and we assume would be at least as sensitive to any such effects as mudflats and sand flats. | | Reefs have now been considered in terms of habitat loss from removal/contamination with drilling fluids. |
| | Table 6.4 (p319): It would be helpful to state where the nearest shallow inlets and bays features are within the Menai Strait and Conwy Bay SAC to support the contention that no pathway is present. | | The nearest SAC shallow inlets and bays features to the Order Limits of the Proposed Development are approximately 6 km to the east, where the Menai Strait opens out at Porth Penrhyn. |
| | 7.3.2: Regarding the application of reduction and mitigation measures, it should be noted that this refers to the Biodiversity Mitigation Strategy (Documents 7.9) that has not been provided to date. Other documents referred to here may also be missing. As the report places reliance on these in reaching conclusions on NSE, the Council is unable to agree with such conclusions at this stage. | | The Biodiversity Mitigation Strategy (Documents 7.7) is secured through Requirement 6 of the draft DCO (Document 2.1). |
| | Table 7.1 (p371): This contains various references to measures set out in the CEMP; however, at present the CEMP includes general principles and industry standard practices, potentially lacking details needed within a NSER to reach firm conclusions regarding effects on European Sites. As per earlier comment, | | All mitigation measures relied on are secured by the draft DCO (Document 2.1). |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | the INNSMS should be available now to support the NSER, not at some point in the future. | | |
| | Table 7.1 (p376): It is unclear why monitoring of slurry level is a measure that will prevent incidents. The Council considers this to simply be a measure that will identify when such an event has happened, rather than a preventative measure. | | Should the pressure decrease this could indicate pressure imbalances and the slurry has entered surrounding rock therefore by monitoring this action can be taken to reduce the risk of a blow out of drilling fluid occurring. |
| | Table 8.1 (p385): Regarding water quality and other effects on the Anglesey and Llyn Fens Ramsar Site / Anglesey Fens, the in-combination assessment relies on the argument that, because there is no spatial overlap with other projects, there would be no likely significant in-combination effects. This argument appears incorrect for potential effects such as air quality impacts or changes to water quality from sources in varying locations around the European Site. | | Section 8 of the HRA Report (Document 5.23) considers whether there is a spatial overlap of the study areas (zones of influence) for Natura 2000 sites between the Proposed Development and the other developments considered in the in-combination assessment. |
| | It is requested that National Grid look at each and every project and plan that could have similar effects on the European Site and then make a judgement around if these, in-combination with the predicted effect of the project, could lead to significant effects and where such effects could occur. Please see comments on the cumulative impact assessment provided on the ecology chapter of the ES (Document 5.9) for further concerns over National Grid's approach to such assessment. | | Section 8 of the HRA Report (Document 5.23) considers whether there is a spatial overlap of the study areas (zones of influence) for Natura 2000 sites between the Proposed Development and the other developments considered in the in-combination assessment. This assessment has considered those projects where there is a spatial overlap of the study areas (zones of influence). |
| | Likewise, for acoustic effects, the Table states that "in-combination effects would be small and no mitigation would be required." The NSER should avoid such statements where effects are clearly quantified, or cross refer to appropriate sources. | | Section 8 of the HRA Report (Document 5.23) now includes a more extensive assessment in relation to the in-combination effects related to noise. |
| Question 4: Are the mitigation proposals adequate and fit for purpose? | As detailed in Section 3, in some areas, notably around the CEMP and associated missing documents, there appears to be a lack of location specific details necessary to support the conclusions of the NSER at this point. Further discussions on this matter should be held with NRW to confirm if this is a major cause for concern. | | All mitigation measures relied on are secured by the draft DCO (Document 2.1). |
| | National Grid is reminded that conclusions on the potential to affect European Sites should be beyond reasonable scientific doubt, as indicated via various case law relating to the Habitats Regulations. | | Noted |

| Table 1: Isle of Anglesey County Council | | | |
|---|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| Question 5: Are there any changes or inconsistencies in the project detail following on from s42 or any Thematic Working Group? | In terms of details relevant to European Sites, project details are as expected and reflect discussions at the ecology TWG meetings to date. | | Noted |
| | Note that as identified in Section 2, the NSER was not shared with IACC at s42 stage. However, as a result of this additional information, IACC notes the following issues: | | Noted |
| | Lack of detail provided around mitigation – the embedded mitigation referred to in NSER is often generic and lacks details needed to support conclusion around no significant effects. | | All mitigation measures relied on are secured by the draft DCO (Document 2.1). |
| | NSER approach to in-combination assessment – the approach taken appears inadequate; may lead to underestimation of effect significance on key European Sites. | | Section 8 of the HRA Report (Document 5.23) considers whether there is a spatial overlap of the study areas (zones of influence) for Natura 2000 sites between the Proposed Development and the other developments considered in the in-combination assessment. This assessment has considered those projects where there is a spatial overlap of the study areas (zones of influence). |
| | Alignment with NRW - IACC was not provided with a draft NSER at s42 consultation; NRW had sight of an earlier draft and it would be helpful to discuss areas of concern with them ahead of SoCG/LIR finalisation. | | Noted |
| Volume 5, Document 5.26, Welsh Language Assessment | | | |
| Overall conclusion of factual assessment | The WLIA needs endorsement from independent language planners. | | National Grid has used Cadnant as an independent language planner, as per Wylfa Newydd Power Station. |
| | There are significant gaps in evidence base e.g. age profile of workers, workers without non-dependents located in TTWA based on assumption, inadequate information where workers will reside. | | At the 4 th thematic working group it was explained that assumptions around workers bringing dependents needed to be evidenced, for example, based on assumptions of duration of role and seniority. National Grid explained that age profiling of workers would be inherently uncertain, but that there was a certain confidence that, due to the short duration, and the fact that workers are unlikely to want to disrupt schooling, especially when Welsh is the first language in schools. These points are further documented in the Workforce Analysis Assumptions Log in Appendix 17.2 (Document 5.17.2.2). |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | The Welsh Language should be regarded as a 'golden thread' running through all aspects of the project. This approach would ensure alignment with the approach undertaken by Horizon. | | Noted. Each of the technical chapters has considered the potential for effects related to Welsh language, however the only one effect was identified in relation to in-migration of workers. This effect was of minor significance, and is mitigated for within the CEMP (Document 7.4). In addition National Grid is preparing further evidence in respect of PPW 10 and the 'golden thread' of the Welsh language. |
| Question 1: Does the information provide sufficient detail/clarity on National Grid's proposal/position? | General comments: A)The IACC welcomes the fact that the National Grid is taking its responsibility seriously towards the Welsh Language. However, it is disappointing that much of the assessment is based on assumption due to lack of baseline information regarding the project (detail provided below). It is also disappointing that the WLIA has been presented at such a late stage in the process since it severely restricts timescales for response. | | See below |
| | b. The report is contradictory in places, on the one hand certain effects are recognised but no mitigation steps have been identified (see section 4 for examples). | | Where minor, moderate or major effects are identified in the WLIA, measures to mitigate the effect are included. Note that only one effect, of minor significance, is observed in the WLIA (Q2, in-migration) and measures are included in the CEMP to mitigate the effects. |
| | c. Horizon has committed to appointing independent Welsh Language Planners to endorse the robustness of the scope, baseline, methodology, scoring system and assessment method within their WLIA. To ensure a consistent approach, IACC requests that National Grid does the same. A request was made by IACC in its comments on the brief by National Grid on conducting a WLIA to ensure specialist Welsh language planning input (see IACC's response to the National Grid's brief on conducting an WLIA page 3: Stage 3). | | As above |
| | d. In addition to our point c) above, IACC considers that National Grid should consider an equivalent document to Horizon's Draft Welsh Language and Culture Mitigation Strategy, which includes a range of mitigation measures. | | The assumption that National Grid should consider measures equivalent to those of Horizon Nuclear Power is considered to be disproportionate due to the differing effects of the two projects. Mitigation should be proportionate to the effects of the project. |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>e. The IACC regards the Welsh Language as a ‘golden thread’ running holistically through all project detail.</p> <p>It is unclear how National Grid demonstrate how the WLIA will influence the socio-economic assessment which should then shape the project (see response by IACC to the National Grid’s brief on conducting an WLIA page1: General Comments).</p> <p>The Future Well Being of the Welsh language is inextricably bound up with the creation of a more sustainable economy and sustainable communities.</p> <p>There are several important drivers which influence sustainable development including the performance of the economy, employment, skills, education; demography; housing provision; connectivity and environmental quality.</p> <p>By its nature, sustainable development places particular emphasis on safeguarding the interests of future generations. <u>It is therefore essential that all the component activities should be subject to rigorous screening and evaluation.</u></p> | | <p>As above</p> <p>Where this is a cross-over with the WLIA and the ES, this is documented under separate subheadings in section 9 of Chapter 17, Socio-Economic (Document 5.17).</p> <p>At the 4th thematic working group meeting, clarification was sought as to what is meant by ‘component activities’. It was confirmed that IACC would like further explanation of the work activities as discussed above. In response to this comment, a workforce analysis assumptions log is provided in Appendix 17.2 (Document 5.17.2.2).</p> |
| | <p>f. National Grid make great play of the specialist nature of the construction jobs with 66% of the workforce estimated to be specialist workers which are likely to be taken by non-home-based workers. Whilst the general assertion may be true, 34% are non-specialist. The assertion also suggests opportunities may exist for training, work experience and possible apprenticeships to build up the capacity and talent of local people. This should be looked at and assessed holistically with the Wylfa Newydd project.</p> | | <p>Enhancement opportunities are discussed in the Enhancement Strategy (Document 7.13).</p> |
| | <p>g. In respect of in-migration, the movement in of workers and their families into the study area will be influenced by a number of complex factors including length of contract, skill level and seniority of position alongside the policy of the contractor/employer.</p> <p>This is likely to be an issue for the Wylfa Newydd project and the preliminary works workforce initially.</p> <p>If contractors are encouraging local residency, there is likely to be a greater demand for bed spaces/accommodation and possible influx of non-Welsh speaking workers into more rural areas with potential adverse effects.</p> | | <p>Refer to Appendix 17.2 (Workforce Analysis Assumptions Log, Document 5.17.2.2) for details of the duration of specialist and non-specialist roles required during construction of the Proposed Development.</p> <p>Where minor, moderate or major effects are identified in the WLIA, measures to mitigate the effect are included. Note that only one minor effect is observed in the WLIA (Q2, in-migration) and measures are included in the CEMP to mitigate the effects (Document 7.4).</p> |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>This will need managing (e.g. National Grid policy for contractors) and monitoring and the development of a joint Accommodation strategy with Wylfa Newydd.</p> <p>Depending on the scale of movement, there may be multiplier implications for local community services etc. These could impact negatively upon the Welsh Language and need to be addressed.</p> | | It considered that the mitigation proposed for the two developments (Wylfa Newydd and the Proposed Development) are proportionate and sufficient to avoid any cumulative effect. |
| | h. The effects have not been considered in terms of short, medium and long term timeframes. | | Further consideration of time frame is now provided in the WLIA. |
| | <p>Specific comments</p> <p>The following information should be updated for factual accuracy:</p> <p>a. Table 26.5 (page 9): Local planning policies</p> <p>i. Isle of Anglesey Single Integrated Plan (IACC, 2013) has been superseded by the Gwynedd and Anglesey Well-being Plan</p> <p>ii. Anglesey Corporate Plan 2013-2017 (IACC, 2013) has been superseded by the Council Plan 2017-2022</p> | | <p>High level priorities from Gwynedd and Anglesey Well-being Plan have been included in the planning policy review section.</p> <p>Gwynedd and Anglesey Well-being Plan still in draft: https://www.llesiantgwyneddmon.org/en/Cynllun-Llesiant/</p> |
| Question 2: Is the detail submitted adequate (ie, in order to make an assessment)? | a. Assessment is based on assumption that workers will not bring their families to in the area. This information is based on worker patterns on similar projects (evidence of this should be included in this assessment report). | | This point was agreed at the scoping stage. |
| | b. Uncertainty regarding the dispersion of the workforce makes it impossible to assess the impact at individual ward level. | | This is a limitation of the assessment; it is impossible to know exactly how workers would distribute themselves and any detailed analysis would be inherently uncertain. |
| | c. 6.3.46 (page 43) – the lack of detail regarding the available age profile of the workers makes it impossible to correctly assess the likely impacts. Different types of ‘workers’ could mean different types of impacts and mitigations. | | At the 4 th thematic working group it was explained that assumptions around workers bringing dependents needed to be evidenced, for example, based on assumptions of duration of role and seniority. National Grid explained that age profiling of workers would be inherently uncertain, but that there was a certain confidence that, due to the short duration, and the fact that workers are unlikely to want to disrupt schooling, especially when Welsh is the first language in schools. |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | These points are document in Appendix 17.2, Workforce Analysis Assumptions Log (Document 5.17.2.2) |
| Question 3: Is there anything missing? What are the gaps? Do you have any views on the impact assessment | a. See response to section 2 above. | | See above. |
| | b. Other likely scenarios should be addressed e.g. the likely effects on schools, services and the community if workers brought their families to live in the area? | | Agreed at scoping. |
| Question 4: Are the mitigation proposals adequate and fit for purpose? | a. No mitigation proposals have been provided based on the assumption that workers will not bring their families to live in the area. Different scenarios should be addressed. The influx of the number of workers during peak (450 non-home based) and exceeding 200 for a period of over 3 years calls for mitigation measures. Accordingly, IACC considers that National Grid should consider an equivalent document to Horizon's Draft Welsh Language and Culture Mitigation Strategy, which includes a range of mitigation measures. Specific details will be proposed by the Council in due course, but National Grid ought to consider what measures it can take to minimise the impact of the scheme on Welsh Language and Culture. | | At the 4 th thematic working group National Grid explained that there was a certain confidence that workers would not bring their families, due to the short duration, and the fact that workers are unlikely to want to disrupt schooling, especially when Welsh is the first language in schools. These points are document in Appendix 17.2, Workforce Analysis Assumptions Log (Document 5.17.2.2). Where minor, moderate or major effects are identified in the WLIA, measures to mitigate the effect are included. Note that only one minor effect is observed in the WLIA (Q2, in-migration) and measures are included in the CEMP to mitigate the effects. |
| | b. Whilst it is recognised in 6.3.27 (page 39) that '...rural wards have less capacity, than the larger urban wards to absorb non-Welsh speakers, even for a temporary period, without having a potential adverse effect on the Welsh language..' no mitigation has been identified. | | As above |
| | c. It should also be taken into account that the subsistence allowance is relatively low, set at £36 per night and might well price workers out of urban areas. | | This is already factored into the assumptions. Further information is provided in Appendix 17.2, Workforce Analysis Assumptions Log (Document 5.17.2.2). |
| | d. It is also recognised in 6.3.33 (page 40) that the ...potential for effects at ward-level is recognised'. Yet again, not mitigation measures have been identified at ward level. | | Where minor, moderate or major effects are identified in the WLIA, measures to mitigate the effect are included. Note that only one effect (minor) is observed in the WLIA (Q2, in-migration) and measures are included in the CEMP to mitigate the effects. |

| Table 1: Isle of Anglesey County Council | | | |
|---|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | e. In 6.7.25 (page 67), 'it is acknowledged that introducing non-Welsh speaking construction workers into communities could, over a period of years, adversely dilute the use and prominence of the Welsh language. It is also stated under 6.3.32 (page 40) that the 'balance of Welsh speakers would be for a temporary period with the number of workers exceeding 200 for a period of just over 3 years'. In terms of language erosion this is a lengthy period of time which can adversely change the community language spoken in pubs, shops, leisure centres and other community groups. It is disappointing that no mitigation measures have been identified. | | Where minor, moderate or major effects are identified in the WLIA, measures to mitigate the effect are included. Note that only one minor effect is observed in the WLIA (Q2, in-migration) and measures are included in the CEMP to mitigate the effects. |
| | f. Linked to point (e) above, IACC has in this and other TWGs discussed the importance of proposals for apprenticeships and training. Almost 10% of all residents (16+) in employment speaking Welsh work in the construction sector and such a procurement policy would benefit the Welsh language and support opportunities for local jobs for local people and greater local prosperity. | | Enhancement opportunities are discussed in the Enhancement Strategy (Document 7.13). |
| | g. IACC considers that steps should be taken to create opportunities for apprenticeships and training particularly targeted at young people. This would have multiple benefits for National Grid, local economy and communities and support Welsh Language policy, Policy PS8 and the Welsh Government priorities. | | As above |
| Question 5: Are there any changes or inconsistencies in the project detail following on from s42 or any Thematic Working Group? | In instances within the document, whilst there is acknowledgement of adverse impacts upon the Welsh Language, there is no commitment to identify mitigation measures. This is especially disappointing. Examples are listed under 4 above. | | Where minor, moderate or major effects are identified in the WLIA, measures to mitigate the effect are included. Note that only one minor effect is observed in the WLIA (Q2, in-migration) and measures are included in the CEMP to mitigate the effects. |
| Volume 5, Document 5.27, Wellbeing Report | | | |
| Overall conclusion of factual assessment | <p>a. The IACC has been outlining its concerns to National Grid relating to the impacts of the proposed scheme on the well-being of Anglesey for a significant period of time, for example our letter of 13 June 2017 and the subsequent Level 2 meeting of 24 July 2017.</p> <p>As a result of National Grid's failure to properly grapple with the issues, and in order to discharge its own duties under the Well- being of Future Generations</p> | | A Well-being Report is provided as Document 5.27 . |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | (Wales) Act 2015 (WBFG Act), the IACC has commissioned its own assessment of the NWCP in relation to Well-being. National Grid has previously been informed of that assessment, which will be provided to it once complete. Until that time however, IACC reserves its position in relation to Well-being. | | |
| | b. In the meantime, IACC strongly resists the suggestion contained within this document that the report on Well-being has been endorsed by IACC as being capable of addressing these pervasive issues in the comprehensive manner required by the new legislative regime in Wales relating to built development. | | A response to this point is documented in the letter from National Grid to IACC dated 28 th March 2018. |
| | C The Council does not accept the narrative being presented by National Grid that a Well-being report, or assessment, has been “screened” or “scoped” on a consensual basis between National Grid and the IACC. Moreover, the report is lacking in the detail required to provide IACC with the confidence that it would be meeting its duties under the Wellbeing of Future Generations Act. | | As above |
| | d. The Well-being Report is flawed as an assessment under the Act for the following principal reasons: I. It acknowledges that it is not an assessment [1.4.3] II. The potential effects are limited to residual effects arising from the EIA process [4.1.2], and reports on Welsh language and tourism commissioned by National Grid III. It considers only the Act’s well-being goals [1.4.4], but does not appear to have considered the Public Service Board’s well-being objectives for the areas of Anglesey and Gwynedd, the IACC’s own adopted well-being objectives, or the well-being objectives adopted by Welsh Government. IV. It fails to have proper regard to the special characteristics of Anglesey and the consideration of well-being in relation to those special characteristics. | | National Grid does not have any direct statutory responsibilities under the Act, but has presented information considered necessary to assist IACC in discharging its statutory duties. Signposting was part of the agreed approach of the perceived effects coming out of the workshop. There does not appear to be anything in IACCs objectives which look at the special characteristics of Anglesey. |
| | Minor comments on the report: • 1.1.2 Third bullet point should specify that it was the participatory workshop recorded in Appendix 27.2 | | These points have been addressed. |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <ul style="list-style-type: none"> 1.2.4 / 1.3.3: An explanation could be inserted here relating to how the well-being assessment predates the EIA Regs 2017 Footnote 15 – typo | | |
| | <p>e. IACC considers that the well-being report would benefit from acknowledging that the DCO application falls under the former EIA regulations. The report is considered to be clear in setting out the process of assessing the project from a well-being perspective pursuant to the EIA regulations, however it's considered that National Grid could have gone much further in assessing the proposed development's accordance with the WBFG Act. The report is lacking in the detail required to provide IACC with the confidence that it would be meeting its duties under the Act.</p> | | <p>Noted</p> <p>As above</p> |
| Detailed comments | Worker Accommodation Management Service | | As above |
| Paragraph 2.2.7 – | <p>a) Please refer to our comments on WAMS in Annex 2 above. IACC considers that the controls afforded by WAMS will be of significant benefit to the resident community. IACC considers that the socio-economic effects of the proposed development are precisely the type of issues that the Council is under a duty to consider and control, as required by the WBFG Act.</p> | | |
| | <p>Safeguarding</p> <p>b) There are wider safeguarding issues other than sex workers and modern day slavery, which includes all types of damaging behaviours towards at risk people and children. Although the number of workers employed by National Grid is significantly fewer than Horizon, 500 workers remains a significant number.</p> <p>c) In line with similar comments we have made to Horizon, we would recommend welcome the introduction of various Codes of behaviour / conduct; Employee Rules; Health and Safety; Drugs, Alcohol and Substance Misuse, etc. and suggest that National Grid require Contractors to put in place similar arrangements and enforce a commensurate standard of conduct across the workforce.</p> <p>d) IACC believes National Grid should ensure that they show leadership in ensuring safeguarding and establish a Recruitment Safeguarding Policy which delivers safeguarding training to the workforce. They should also mainstream</p> | | A Code of Conduct is required Within the CEMP (Document 7.4) which would be secured by DCO requirement. |

| Table 1: Isle of Anglesey County Council | | | |
|---|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | safeguarding impact assessments in contractor/sub-contractor tendering processes. | | |
| Paragraph 2.2.11 | IACC agrees with the statements regarding ongoing community focused discussions, but these in locations where there is prolonged activity (e.g. Tunnel Head House) the local authority suggests that National Grid considers setting up residents' liaison groups. | | Various communication routes for liaison with residents are set out in section 2.3 of the CEMP (Document 7.4). |
| Table 27.18 | See our comment above and our earlier comment that we believe that National Grid should collaborate with HNP on its WAMS. | | As above |
| Paragraph 5.27.2.2 | We believe National Grid should ensure that they show leadership in ensuring safeguarding and establish a Recruitment Safeguarding Policy which delivers safeguarding training to the workforce. They should also mainstream safeguarding impact assessments in contractor/sub-contractor tendering processes. | | As above. |
| Volume 5, Document 5.28, Schedule of Mitigation | | | |
| Observations | 1. Mitigation for construction noise is predominantly through control measures, and design of construction compounds. Chapter 15 of the ES relies heavily on the mitigation to be set out in the Noise and Vibration Management Plan (NVMP), and hence so does Chapter 28. The NVMP has not yet been received. This means that there is insufficient information currently available to enable IACC to comment on the likely adequacy of mitigation measures for construction, and this will need to be re-visited when more information is available. This should be in advance of DCO submission. | | Noted; however time limitations did not allow for the NVMP (Document 7.9) to be shared prior to submission. |
| | 2. IACC appreciate the attempts made to make the document thorough. However, there is significant and possibly unnecessary repetition within Table 10, where information is repeated which may not be appropriate for that Source of Effect. An example is the repetition of standard text in the 'Control and Management Measures & Mitigation Measures' column which includes blasting and tunnelling works where the Source of Effect described is not shaft or tunnel construction associated with the Braint THH site | | Noted; this table has been updated where necessary. |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | 3. Section 1.2.1 Mitigation Measures – reference made to the Schedule of Environmental Commitments (Document 7.4.2.1) as a key enabler of mitigation. Inference that all of these measures are secured through DCO Requirement (including CEMP Requirement 8). There is no reference to wider commitments to enhancement measures nor to the relationship between Mitigation and s106 in this section. Further detail would be welcome on the extent to which National Grid intend mitigation as set out in the Schedule to also address Intra and Inter Project effects. These elements are not widely covered at present. | | Enhancement opportunities are discussed in the Enhancement Strategy (Document 7.13). |
| | 4. Each introductory section of each chapter / topic makes reference to the relevant chapter of the ES. The suggestion is that all mitigation measures which are set out in each of these chapters have been secured within the Requirements or other measures specified within the Tables which follow. This requires confirmation. | | The purpose of the document is primarily to identify where mitigation measures are secured. |
| | 5. Each Table in respect of Mitigation Measures would be more helpful if the severity of the effect were identified pre and post mitigation. The source of the effect is noted but not the significance. It is currently not possible to determine whether the mitigation measure secured has a material influence on the severity of the effect identified within each of the tables. It is also not possible to determine whether all effects are mitigated (even negligible as inferred in the document) or only those which are significant. | | A Summary of Residual Effects is now provided as Document 5.22 . |
| | 6. The full details of the measures set out in the CEMP are vital in order to be assured of the confidence that IACC can have in the mitigation (upon which reliance is being placed in the ES). At the current time, the CEMP is incomplete and therefore IACC does not have confidence that a) the full range of necessary mitigation has been identified or b) that National Grid is willing or able to provide or secure the necessary mitigation. IACC has also previously outlined that the CEMP ought to be secured by a requirement which ensures that the final form of the CEMP is approved by the local planning authorities. | | The CEMP is provided as Document 7.4 , which is secured by Requirement 6 of the DCO. |
| | 7. Table 2 Landscape – Section 1.2 makes commitments to retain and reduce as far as practicable groups of trees. There is a clear query around the deliverability / enforceability of such a measure given the uncertainty associated with it. | | Potential losses are identified in Document 4.11 Trees and Hedgerows Potentially Affected Plans. The aim will be to retain and reduce these losses where practicable. |

Table 1: Isle of Anglesey County Council

| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
|---------------------------------|---|----------------|---|
| | 8. Reference to a Tree and Hedgerow Protection Strategy / Boundary Features Protection Strategy, Soil Management Plan (SMP), Pollution Incident Control Plan (PICP) etc. are welcome and reliance is being placed upon these measures – the full details of the strategies will need to be shared with IACC for approval Prior to the commencement of development, and consulted on urgently. This is a relevant statement for all wider strategies which have not been shared in full with IACC to date. | | Noted; however it should be noted that of these documents only the Outline Soil Management Plan (Document 7.10) is being submitted at this stage. |
| | 9. Reference to Reinstatement Schemes in Table 2 is welcome and reliance is being placed upon it – the full details of that Strategy will need to be shared with IACC for approval prior to the commencement of development, and consulted on urgently. | | The draft wording of Requirement 9 is as follows: <i>‘Unless otherwise agreed with the relevant planning authority, no stage of the authorised development may commence until, for that stage, a mitigation planting scheme for the planting of trees, groups of trees, woodlands and hedgerows has been submitted to and approved by the relevant planning authority’</i> |
| | 10. An Arboricultural Clerk of Works is referenced in Table 2. It is unclear whether this will be a direct appointment by National Grid, by the contractor or whether provision would be expected to be made under s106. The scope of works / mechanism of control for this role would need to be agreed with IACC. | | The Arboricultural Clerk of Works would be appointed by either National Grid or their Contractor. |
| | 11. Reliance is being placed on the Landscape Mitigation Scheme secured under Requirement 9. IACC would need to have confidence that the matters for agreement under Requirement 9 will be provided in advance in draft form for approval. | | The draft wording of Requirement 9 is as follows: <i>‘Unless otherwise agreed with the relevant planning authority, no stage of the authorised development may commence until, for that stage, a mitigation planting scheme for the planting of trees, groups of trees, woodlands and hedgerows has been submitted to and approved by the relevant planning authority’</i> |
| | 12. Mitigation Planting is relied upon being secured through Requirement 9. IACC would need to have full details of the scheme for prior approval pre-commencement of those works. | | The draft wording of Requirement 9 is as follows: <i>‘Unless otherwise agreed with the relevant planning authority, no stage of the authorised development may commence until, for that stage, a mitigation planting scheme for the planting of trees, groups of trees, woodlands and hedgerows has been submitted to and approved by the relevant planning authority’</i> |

Table 1: Isle of Anglesey County Council

| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
|---------------------------------|---|----------------|--|
| | 13. Lighting measures (as set out in Table 3) will need to be controlled to a level which is agreed with IACC via Requirement 6 (which relates to the CEMP). | | It is not currently proposed that the CEMP (Document 7.4) would be subject to approval from IACC. |
| | 14. It is not clear what additional measures are to be introduced to offset visual effects associated with the project than landscape effects. This can be inferred but there are clearly common elements of mitigation strategy set out in Tables 2 and 3. It would be helpful to identify whether the mitigation secured is intended to address more than one form of effect and the extent to which this specific effect is addressed by that mitigation. It is in this topic (visual) that a broader commentary on opportunities for indirect mitigation (beyond direct physical location of effects) and enhancement would be expected. These are absent at present. | | The Enhancement Strategy (Document 7.13) sets out proposals for the Voluntary Residential Planting Scheme (VRPS) which would provide additional mitigation where the offer of planting is taken up. |
| | 15. Tourist Attractions are cited as a receptor against which provisions are to be made for mitigation. This is an area where more clarity over the significance of effects at specific attractions and the proposed mitigation and effect of incorporating that mitigation would be helpful. General measures set out and to be secured via the CEMP (Requirement 6) are recognised but there is an absence of detail and specificity at present. | | Any mitigation measures required are identified in Chapter 17 Socio-Economics and have been updated in Document 5.28 , Schedule of Mitigation |
| | 16. Reference is made to reinstatement under measure R3 of the CEMP. Whilst reference to and inclusion within the CEMP provides a helpful framework of complementary measures there is a need for a high degree of specificity associated with reinstatement measures (relevant to the specific location / requirements therein) which will need to be reflected in proposals for IACC approval. | | 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). |
| | 17. Section 1.15 of the Environmental Commitments Register references certain properties not being occupied. It is unclear what this commitment is and clarity is sought. If this is to be secured it ought to be done through a s.106 agreement to ensure the Council is able to secure this mitigation. | | Noted, any properties referred to in this was have either been purchased or are in the process of being purchased. |
| | 18. Section 1.3.1 p3 (p9 of the pdf) indicates that mitigation by design is illustrated on the Works Plans (Document 4.4). IACC have not yet received the full set of Design Plan, so these will need to be reviewed and commented on in future (pre DCO submission). This is particularly important in the area around the THH at Braint. | | Noted – these plans are provided as Document 4.4 |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | 19. At the end of Table 3 there are a wide range of receptors including Communities, Private Views, Wales Coast Path, Promoted Viewpoints, Road, Rail etc. Clearly, these groups of receptors experience quite different effects associated with the proposed scheme and the reference to measures set out only within the Environmental Commitments Register (ECR) seems disproportionate to the scale and complexity of effects which are anticipated. The ECR does not contain sufficient specific information with respect to effects and the means to mitigate them and therefore, subject to ongoing discussions, IACC considers that a landscaping strategy, secured through a DCO requirement will be necessary. | | The commitments made in the ECR have been taken into account in concluding on the significance of effects on each of the receptors identified. |
| | 20. On Chapter 4 Ecology it would be expected that reference would also be made to the measures to manage / mitigate effects upon the Natura 2000 site at Menai Strait from a Habitats Regulations Assessment perspective. This is picked up later in Table 4. | | Any measures required have been added into Chapter 9 Ecology and Nature Conservation (Document 5.9) and have been brought through into Document 5.28 , Schedule of Mitigation. |
| | 21. Cross cutting measures which are committed to and which are relevant are set out in Table 4. This approach is welcome and should be adopted through the Schedule of Mitigation. | | Noted |
| | 22. Entries for Coed Pant Ladiwen CWS, Tyddyn-Heilyn CWS amongst others including Liverpool Bay SPA have not been completed. | | Noted; However it is confirmed that the updated Schedule of Mitigation (Document 5.28) includes all mitigation relied upon in the ES. |
| | 23. It is unclear why reference is made to Natura 2000 features where 'no significant effects' are noted and no mitigation is to be provided in Table 4. This might be clearer in the upfront section of this Chapter. | | Noted |
| | 24. Reference to habitat woodland replacement for Gylched Covert CWS is made on 'possibly' an improved basis. It is unclear what mitigation is to be secured here and what is therefore being relied on for assessment purposes. | | Any measures required have been added into Chapter 9 Ecology and Nature Conservation (Document 5.9) and have been brought through into Document 5.28 , Schedule of Mitigation. |
| | 25. It is unclear why no mitigation has been set out for Coed Pont Ladi-wen CWS or Tyddyn-Heilyn CWS. Mitigation is required. | | Tyddyn-Heilyn CWS will no longer be affected by the Proposed Development due to changes in the Order Limits. The only area of Order Limits that fall within the CWS and ancient woodland of Coed Pont Ladi-Wen CWS is that required for a visibility splay. This area comprises the grass verge already maintained for |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | visibility for the existing junction. Minor mitigation has been included within the BMS (Document 7.7) to prevent encroachment. |
| | 26. Greater clarity is required on the different approaches to collision risk to be set out in the CEMP and related to bird species identified within Table 4. It is unclear how National Grid has assigned a different approach to mitigation at a species level from Table 4. | | Any potential risks have been stated within section 9 of the ecology chapter 5.9, Ecology and Nature Conservation (Document 5.9) and associated Appendix 9.15 Ornithological Assessment Report (Document 5.9.2.15). This concludes that there are no significant effects for collision that would require mitigation. |
| | 27. The measures and process of appointment of an Ecological Clerk of Works (together with any relevant information pertaining to s106) should be set out for IACC approval. | | The appointment of the Ecological Clerk of Works will be made by either National Grid or their appointed Contractor. |
| | 28. Table 4 refers to the Biodiversity Mitigation Strategy which IACC has yet to see. | | Noted; unfortunately it was not possible to share a draft of this document prior to submission. |
| | 29. Under Chapter 5 reference is made to potential archaeological remains having been considered in routeing. It is unclear from this statement what provision has been made for identifying the location of remains along the route to reduce levels of uncertainty. | | Geophysical and trial trench surveys have been undertaken which have informed either the routeing itself of the Schedule of Environmental Commitments. |
| | 30. The proposed approach to SMS and Watching Brief will need to be agreed with the IACC County Archaeologist prior to commencement. Whilst specific receptors or groups of receptors are identified within Table 5 the proposed mitigation measures are limited to those which are largely established across the whole of the project. It is unclear whether specific and localised effects have been considered and tailored mitigation provided. | | Further information is provided in the Archaeology Strategy (Document 7.8) and the CEMP (Document 7.4) |
| | 31. It is unclear from Table 6 how the need for a watching brief will be determined. | | Measure AC11 in the CEMP (Document 7.4) confirms that in order to appropriately preserve, either in situ or by formal record, any remains of archaeological interest within the Order Limits the following control measures will be adopted: <ul style="list-style-type: none"> physical protection where possible in order to avoid disturbance; and provision for archaeological recording through: |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | <ul style="list-style-type: none"> ○ a targeted programme of 'Strip, Map and Sample' recording of identified areas of archaeological interest, and ○ Watching Brief in areas of lesser archaeological interest. <p>Further details are provided in the Archaeology Strategy (Document 7.8)</p> |
| | 32. A common mitigation which is referenced throughout Table 6 is 'Fuel and chemical storage to be located a minimum of 8m away from any watercourse and 50m from an abstraction borehole.' The mitigation set out in Chapter 11 of the Draft Environmental Statement states 10m away from any watercourse. This needs to be amended for consistency. | | This has been amended to 10 m for consistency |
| | 33. The mitigation measures set out in Table 6 are very general and require more alignment of 'source of effect' and 'control and management measures & mitigation measures' to be meaningful. | | Noted; However it is confirmed that the updated Schedule of Mitigation (Document 5.28) includes all mitigation relied upon in the ES. |
| | 34. In relation to pollution due to chemical spillages and leaks posing risk to construction workers, National Grid should also have regard to Environmental Damage (Prevention and Remediation) Regulations 2009 | | Noted |
| | 35. The reference to Table 6 on Human Health includes a mitigation measure commencing with 'Subsequently....'It is unclear whether this is an incomplete sentence. | | Noted, this has been addressed |
| | 36. Table 7 relating to water quality and wider matters should also cross reference to Table 4 on Ecology (particularly in respect of features such as Tre'r Gof SSSI). | | Noted; However it is confirmed that the updated Schedule of Mitigation (Document 5.28) includes all mitigation relied upon in the ES. |
| | 37. Table 8 records a wide range of receptor groups People at Home, People in workplaces, Sensitive groups (children, elderly and disabled), Sensitive locations etc which are expected to experience a range of impacts. The reference to CTMP and the CEMP provides an indication of where mitigation measures will be specified but not their nature. It is expected that further details will emerge before submission for the CTMP and CEMP which will address each receptor type recorded in Table 8. | | Measures are often cross cutting, mitigating effects on a range of receptor types. Only where a bespoke measure is required for a specific receptor type, if this highlighted in the OCTMP (Document 7.5) or CEMP (Document 7.4), for example avoiding traffic on links during school drop off and pick up times. |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | 38. The Council has raised concerns about the closing on Lon Pont Ronwy. This is not currently designated as a Public Right of Way (PRoW) however it is well used by local residents. The Council is seeking an enhancement to this route to provide alternative pedestrian access during the period of construction. | | Noted. Enhancement opportunities are discussed in the Enhancement Strategy (Document 7.13). |
| | 39. Table 9 should be cross referred to Table 4 for ecologically sensitive receptors. | | Noted; However it is confirmed that the updated Schedule of Mitigation (Document 5.28) includes all mitigation relied upon in the ES. |
| | 40. Chapter 10 makes reference to measures secured under COPA and evolving design. This should be set in the context of IACC having confidence in overarching and project wide controls on noise and vibration secured under DCO Requirement. | | Additional information is provided in the Noise and Vibration Management Plan (Document 7.9). |
| | 41. Mitigation for construction noise is predominantly through control measures, and design of construction compounds. Chapter 15 of the ES relies heavily on the mitigation to be set out in the Noise and Vibration Management Plan (NVMP), and hence so does Chapter 28. The NVMP has not yet been received. As stated above, this means that there is insufficient information currently available to enable IACC to comment on the likely adequacy of mitigation measures for construction, and this will need to be re-visited when more information is available. It is recommended that this is done pre DCO submission given the reliance on the NVMP. | | Noted; unfortunately it has not been possible to share this document in advance of submission. |
| | 42. Table 10 - The Local Authority believes that noise working activities should be confined to:- <input type="checkbox"/> 7am – 7pm Monday – Friday. <input type="checkbox"/> 8am to 1pm Saturday. <input type="checkbox"/> No time on Sunday or Public Holidays. <input type="checkbox"/> Blasting activity should only take place between 10am – 4pm (MTAN1) and should avoid weekends and public holidays. <input type="checkbox"/> Any activities outside of these times could form part of specific s61 prior consents. | | Proposed constraints on noise generating activities are set out in the Noise and Vibration Management Plan (Document 7.9). |

| Table 1: Isle of Anglesey County Council | | | |
|--|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | 43. Construction traffic movements are stated to be undertaken in accordance with the Construction Traffic Management Plan (CTMP, Document 7.12) – this has not yet been received by IACC, so any implications from the plan on noise / vibration will need to be re-visited when the information is received. Given the reliance placed on this document it should be shared in advance of DCO submission. | | The Outline CTMP (Document 7.5) has been circulated to IACC for comment and has been updated and revised within the submission. |
| | 44. p568 (p578 of document) – relates the provision of site hoardings and/or noise barriers to meet noise limits for construction. IACC believe that the provision of this type of mitigation should aim to mitigate potential significant effects. We have not seen within documentation provided to date an explicit commitment to carrying out noise predictions, which we would expect to be carried out when detailed construction information becomes available. | | Updated details are provided in the Noise and Vibration Management Plan (Document 7.9). |
| | 45. Controls for noise should be secured through DCO requirement with reference to specific proposed activities and control measures stipulated within the Noise and Vibration Management Plan. The NVMP should be shared in full in advance of DCO submission. | | The Noise and Vibration Management Plan (Document 7.9) forms part of the CEMP which is secured by Requirement 6. |
| | 46. IACC welcome the inclusion of a 2.4m high solid hoarding for the Braint THH site (p604). To be effective as a noise barrier a solid hoarding will need to have a degree of mass, and this, or a construction capable of achieving it, should be included in the NVMP to ensure that performance is adequate. | | Further information and commitments to not exceeding noise and vibration limits are set out in the Noise and Vibration Management Plan (Document 7.9). |
| | 47. p583 : IACC welcome the commitment in NV22 cross referred to here to ‘use the quietest plant and methods of construction appropriate to the foundation type required’. | | Noted |
| | 48. p591: IACC welcome the statement that drilling and curtain grouting would only be carried out during daytime hours. However, we note that: (1) ‘daytime hours’ need to be defined in this context, and (2) this does not exactly mirror the CEMP (NV31) which states ‘core working hours’ only. We have previously stated, and repeat here, that activities with the potential to give rise to disturbance should not be carried out on Saturday afternoons, Sundays and bank/public holidays, which may be included by NG in their definition of ‘daytime’. | | Noted - Further information and commitments to not exceeding noise and vibration limits are set out in the Noise and Vibration Management Plan (Document 7.9). |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | 49. p591: With respect to drill and blast activities, IACC welcome the addition of the following paragraph: 'Vibration and air overpressure from blasting will be assessed and controlled by the appropriate contractor to the satisfaction of IACC and GC'. The means to secure this approach should be confirmed. | | Further information and commitments to not exceeding noise and vibration limits are set out in the Noise and Vibration Management Plan (Document 7.9). |
| | 50. p592: With respect to drill and blast activities, 2nd row: IACC note that the vibration limit for an individual blast is stated as 8mm/s, rather than 10mm/s as per the CEMP NV33. IACC welcomes this reduction, but have flagged to ensure that this is not a typographical error. | | The Noise and Vibration Management Plan (Document 7.9) correct this to 10mm/s. |
| | 51. p595: IACC welcome the addition of NV38, which adds a commitment to provide written notification to residents close to the tunnel of the TBM passing close by. | | Noted |
| | 52. It is unclear from the complaints handling procedure how noise complaints and the process of follow up will be communicated to IACC. The monitoring regime associated with construction activities for the project and noise complaints should be communicated at regular intervals (to be agreed) to IACC. | | There are currently no proposals to provide information about complaints or follow up to IACC. |
| | 53. Reference is made to tunnelling works being undertaken 'outside of core working hours and are not restricted'. Such control measures as might be necessary for these works are to be agreed with IACC. | | The only control measures identified relate to noise and vibration and these are as set out in the Noise and Vibration Management Plan (Document 7.9). |
| | 54. Section 11: Operational Noise IACC has previously flagged some issues with respect to noise and vibration control associated with ES Chapter 16. These comments are not repeated here, although as Chapter 28 copies across the key points from these documents, the comments generally still apply. | | Noted |
| | 55. Chapter 12 notes that there are no specific measure to mitigate socio-economic effects other than those expressed in other chapters. | | Noted |
| | 56. IACC notes that Chapter 28 covers issues not previously covered within the Thematic meetings. Apart from this information is broadly consistent with that from s42 and Thematic Group Meetings. | | Noted |
| Volume 7, Other Documents, CEMP | | | |

| Table 1: Isle of Anglesey County Council | | | |
|---|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| Overall conclusion of factual assessment in respect of CEMP | Presently the drafting of the DCO assumes that the CEMP considered at examination will contain sufficient detail for IACC and the Examining Authority to be satisfied that it is a completed control document at the end of examination. Given the absence of detailed information about the nature of the development and the controls therefore required, that is simply inappropriate. IACC considers that the CEMP must be updated and that it must be approved in writing by the local planning authority/ies prior to constructions commencing (or for each stage). | | Noted, however National Grids position has not changed. |
| | Without the Air Quality ES chapter and the updated Construction Traffic Management Plan, it is not possible for IACC to comment on whether the air quality mitigation proposals are adequate. | | Noted – these documents were subsequently issued to IACC and comments received. |
| | <p>In addition, it is considered that National Grid could go further in providing details of a proposed strategy in particular in respect of:</p> <ul style="list-style-type: none"> • Transport requirements and impact on the road network • Decision making process for determining direction of tunnel construction • Further information on proposed re-use of materials on site, and justification for not appearing to actively take steps to re-use materials arising from shaft and tunnel construction • Likely facilities to be used if storage of excavated material is required • Storage of material to be re-used following re-instatement | | <p>Point 1 is covered by the TA (Document 5.13.2.1) and the OCTMP (Document 7.5)</p> <p>Point 2 paper on tunnelling direction to be picked up again</p> <p>Point 3 information from testing of arisings would be needed before any commitment to re-using material to create mounding around the THH could be made. Some mounding may be necessary for landscape/visual mitigation.</p> <p>Point 4 is discussed in Chapter 4 Construction, Operation, Maintenance and Operation of the Proposed Development. (Document 5.4).</p> <p>Point 5 is discussed in Chapter 4 Construction, Operation, Maintenance and Operation of the Proposed Development. (Document 5.4).</p> |
| | <p>There are a number of documents which it is expected will be shared through future batches in advance of DCO submission which will enable an adequate understanding of mitigation proposals. This includes:</p> <ul style="list-style-type: none"> • Biodiversity Mitigation Strategy • Construction Traffic Management Plan | | Of these documents only the Biodiversity Mitigation Strategy (Document 7.7) has not been available in time to share. The PRoWMP (Document 7.6) has been issued twice. It was issued in July 2017 in Draft, and no comments were received. It was reissued again in March 2018. |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <ul style="list-style-type: none"> Public Rights of Way Management Plan | | |
| | <p>Further clarity is also requested with regards to:</p> <ul style="list-style-type: none"> Active travel Dedicated officer for monitoring activities through S106 | | The active travel section of the Transport Assessment (Document 5.13.2.1) has been updated from the Batch 2 submission and expands upon worker travel. |
| Question 1: Does the information provide sufficient detail/clarity on National Grid's proposal/position? | The CEMP makes reference to a number of plans which IACC understands are set to be secured by DCO Requirement, however these have yet to be shared with IACC. This includes: Biodiversity Mitigation Strategy, Construction Traffic Management Plan and Public Rights of Way Management Plan. It is requested that these plans are provided in advance of DCO submission to ensure adequate engagement with the Council on specific mitigation measures | | See above response |
| | Paragraph 2.2.6 refers to activities which may take place outside core working hours and includes "any highway works requested by the highway authority to be undertaken outside the core working hours". It is expected that this will be agreed with the Council and secured under Requirement. IACC considers that further discussion is needed in respect of working hours and is eager to continue these discussions. | | The matter of working hours has continued to be discussed. The working hours set out in the DCO and CEMP are those considered necessary in order to ensure the programme can be achieved and the connection date for Wylfa Newydd met. |
| | Paragraph 3.3.1 refers to the production of a Travel Plan which supports and encourages sustainable travel (public transport, cycling, walking and car sharing). It is not clear whether active travel is supported by National Grid, as the draft Transport Assessment appears to suggest otherwise (by stating that cycling is not prohibited during construction). Clarification is requested on the matter. | | Given the nature of the Proposed Development and National Grid's inherent health and safety obligations, active travel to site Working Areas would not be permitted during the construction phase of the Proposed Development. |
| | Paragraph 3.5.1 refers to monitoring activities and notes that the contractor will undertake inspections including monitoring compliance with the CEMP. The Council has requested a dedicated Officer on a number of occasions to be funded through a S106 obligation which will enable the impacts of the Proposed Development to be assessed. | | National Grid is discussion with IACC regarding resourcing. |
| | Table 7.4.1 General Measures – refers to the Construction Traffic Management Plan (CTMP), Document 7.12 which is secured by Requirement 5. It is expected that an updated version will be provided as part of future batches. | | Noted and as per comments on Chapter 13 above. |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | Table 7.4.2 – refers to Stakeholder Communications Plan (SCP) (not yet received) – which may contain the detail not provided in CEMP with respect to detail of plans for communication with stakeholders. | | Production of the Stakeholder Communications Plan (SCP) is secured by Requirement 7. |
| | Section 2.4 –The general principles of community engagement and public information are outlined. It will be important that the agency is in place in good time. | | Noted |
| | Sections 3.2 and 3.4 – the sections outline some measures that will be included in the Dust Management Plan (DuMP) in terms of general measures, site layout, storage and handling of materials, and communications and records. National Grid should follow the Institute of Air Quality Management's (IAQM's) Guidance on the assessment of dust from demolition and construction (2016). The measures which are listed are appropriate, but without a dust assessment of the various activities it is not possible to comment on whether they are sufficient. For large areas of activity, National Grid should use the IAQM's Guidance on the Assessment of Mineral Dust Impacts for Planning (2016), considering the meteorological characteristics of the site. | | The construction phase dust impacts have been considered in line with the appropriate guidance document (Guidance on the assessment of dust from demolition and construction, Institute of Air Quality Management, Version 1.1, February 2014), as agreed during the formal scoping exercise. |
| | Section 3.3 outlines some measures affecting road traffic and energy plant that will be included in the Construction Traffic Management Plan (CTMP) (Document 7.7). The measures which are listed are appropriate, but without a full air quality assessment it is not possible to comment on whether they are sufficient | | The air quality assessment demonstrates that impacts associated with road traffic and emergency generator plant emissions are not significant. |
| Question 2: Is the detail submitted adequate (ie, in order to make an assessment)? | Whilst the detail contained within the CEMP is generally sound, there is reference to further detail to be provided in documents which IACC has yet to see. Until IACC has seen all relevant documents, a definitive reply cannot be provided. (See response to Question 1) | | Noted; where possible other documents have been shared with IACC, including the OCTMP (Document 7.5) and Chapter 14 Air Quality (Document 5.14) |
| Question 3: Is there anything missing? What are the gaps? Do you have any views on the impact assessment by National Grid? | See comments to Q1 and Q2. | | N/A |

| Table 1: Isle of Anglesey County Council | | | |
|---|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | |
| Question 4: Are the mitigation proposals adequate and fit for purpose? | Those provided are generally considered to be adequate – however IACC’s rights are reserved to provide further comment upon receipt of the missing plans | | Noted |
| Question 5: Are there any changes or inconsistencies in the project detail following on from s42 or any Thematic Working Group? | N/A | | N/A |
| Volume 7, Other Documents, Schedule of Environmental Commitments | | | |
| Schedule of Environmental Constraints | IACC notes that there are multiple references within the Schedule of Mitigation to the Schedule of Environment Constraints (document 7.4.2.1). In reviewing the Schedule of Mitigation, IACC has had reason to revisit that document, and therefore offers the following comments on the Schedule of Environment Constraints (document 7.4.2.1): | | Reference is made in the Schedule of Mitigation (Document 5.28) as to where measures are secured through the Schedule of Environmental Commitments (Document 7.4.2.1). |
| | a. It is not clear what the purpose or status of this document is. National Grid should clarify this. To the extent it includes mitigation measures, they ought to be included in the Schedule of Mitigation. | | |
| | b. We are aware from the NSER (document 5.23) that part of the intent of this document is to secure additional constraints on the operation of the limits of deviation for the scheme. If that is correct, that ought to be explained in the introduction to the report. The relevant provisions ought to be identifiable. | | The HRA Report (Document 5.23) does not introduce additional constraints. It relies upon mitigation set out in other documents. The HRA Report has been updated to reflect the change in status of mitigation in the HRA process following the recent People over Wind case. |
| | c. There are multiple references within the table to certain matters being done, or impacts avoided, "as far as practicable". That is insufficiently precise to allow the IACC or PINS to place any reliance on the relevant constraint being identified. Either an impact is to be avoided, or the impact is to be assessed. All | | Noted |

| Table 1: Isle of Anglesey County Council | | | |
|---|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | such qualifying terms should be removed, or the relevant entry removed from this document. | | |
| | d. Repetition should be avoided. For example, HDG001 and HDG002 are identical. | | Noted |
| | e. Repetition of one constraint applicable to all elements of the development should be avoided if possible. For example, all entries in table 2 appear to capture the same point - that temporary loss of important hedgerow will be reduced. Presumably the 244 entries are then intended to apply to all relevant sheets of the work plans, on different options. This could be recorded in a single line item, rather than spread over nearly 30 pages. This comment applies to many of the entries in this document. | | Repetition has been reduced to some extent. |
| Volume 7, Other Documents Outline Waste Management Plan | | | |
| Overall conclusion of factual assessment in respect of Outline Waste Management Plan and Outline Materials Management Plan: | Presently the drafting assumes that the CEMP considered at examination will contain sufficient detail for IACC and the Examining Authority to be satisfied that it is a completed control document at the end of examination. Given the absence of detailed information about the nature of the development and the controls therefore required, that is simply inappropriate. The CEMP ought to be updated and approved in final form by the local planning authority/ies. | | See comment on the CEMP |
| | <p>In addition, it is considered that National Grid could go further in providing details of a proposed strategy in particular in respect of:</p> <ul style="list-style-type: none"> • Transport requirements and impact on the road network • Decision making process for determining direction of tunnel construction • Further information on proposed re-use of materials on site, and justification for not appearing to actively take steps to re-use materials arising from shaft and tunnel construction • Likely facilities to be used if storage of excavated material is required | | See previous comments |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <ul style="list-style-type: none"> Storage of material to be re-used following re-instatement | | |
| Question 1: Does information provide sufficient detail/clarity on National Grid's proposal/position? | The waste strategy is considered by IACC to be an important part of National Grid's draft application, not least because it has a number of environmental dependencies. In general, the OWMP is not considered to provide adequate detail in respect of the proposed waste strategy. | | Likely facilities are identified in the OWMP/OMMP however flexibility needs to be retained to take account of changing circumstances and the potential for new opportunities to arise. |
| | The OWMP reports that approximately 300,000 tonnes of material will be excavated for the shaft and the Menai tunnel construction, and that 700,000 tonnes of aggregate will be required to construct the access tracks. There is no detailed information on the transportation of this material on the road network which makes it difficult to comment on the proposed use of the network and how this may impact on traffic, communities, air quality and noise. | | The assessment ends when traffic reaches strategic road network. This is essential to allow the contractor flexibility, should a new opportunity may arise. Any facilities used for recycling or deposition are covered by their own licences and permissions for traffic movements. |
| | Based on a 10 to 20 tonnes per vehicle ratio, it is considered that a figure of 300,000 tonnes of materials has the potential to generate up to 30,000 trips (one-way). It is imperative that this is included in the Traffic and Transport chapter (Document 5.13) and the Outline Waste Management Plan should cross-reference this. | | All necessary traffic movements are included in the Traffic and Transport chapter (Document 5.13) and the Transport Assessment (Document 5.13.2.1). |
| | Paragraph 4.3.1 confirms that waste arisings provided in the OWMP are preliminary and that a more accurate estimation would be calculated by the contractors before commencement of construction. Considering paragraph 6.9.5 refers to "an increasing awareness" amongst operators of the waste opportunities that may occur as a result of significant developments in North Wales, it is expected that National Grid will continue to undertake engagement with various facilities. Consequently, IACC considers that the Minerals and Waste Thematic Working Group should continue to meet (and be funded by National Grid) throughout the consenting and construction process. | | National Grid is discussion with IACC regarding resourcing. |
| | The ground investigation results reference is missing in paragraph 5.1.3. | | Noted and addressed |
| | Paragraph 5.1.5 notes that the alternative options for excavating the tunnel under the Menai from Anglesey and from the mainland will be retained to enable the contractor to determine the most "beneficial" direction. The anticipated decision making process is not clear, and an understanding of how the direction is expected to be determined would be helpful to ensure that environmental impacts are appropriately mitigated. | | The environmental impacts of all tunnelling scenarios have been considered in the technical chapters (Document 5.7 to 5.18) as appropriate. |

Table 1: Isle of Anglesey County Council

| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
|---------------------------------|---|----------------|--|
| | Table 5.3 provides a summary of the estimated materials required for the overhead line construction including access tracks (and subsequent use / disposal method). The strategy for managing this waste post-construction has not been adequately defined in the OWMP. | | The updated OWMP sets out the current proposals in this respect. The waste management strategy will depend in part on the materials used for access track construction and flexibility is required on these aspects of the Proposed Development. |
| | The OWMP summarises and states in paragraphs 6.1.2 and 6.1.3 that there will be limited opportunity to re-use the shaft and tunnel excavation material due to the expected construction programme which is due to involve access track construction in advance of tunnel excavation. Paragraph 6.1.6 confirms that opportunities on Anglesey for recycling and disposing of these materials are limited and thus transportation to facilities in North Wales is anticipated. Considering the significant amount of aggregate required for access track construction (and the likelihood as set out in the summary of the Plan that primary aggregates will be more appropriate than secondary or slate), it seems unwarranted that a proportion of this is not due to be considered for re-use in the 700,000 tonnes required for the construction of the temporary access tracks across the whole development. | | Tunnel arisings would be used if appropriate and feasible, however there are programme constraints primarily related to the required connection date. |
| | At the present time, it is considered that further justification is required to enable IACC to agree to the proposed approach; National Grid should produce a methodology and a phasing strategy to justify why these works cannot be better aligned. To that extent, IACC considers that the tunnel should be phase 1 so that aggregate can be recycled and reused. IACC understands that National Grid need to commence work on the tunnel as soon as practicable post consent, so does not envisage that this would be controversial. | | Tunnel arisings would be used if appropriate and feasible, however there are programme constraints primarily related to the required connection date. |
| | It is also expected that National Grid has undertaken a review of the Minerals Safeguarding Areas on the island. | | Consideration is given to MSAs in the Planning Statement (Document 7.14). |
| | Furthermore, paragraph 5.1.9 states that it's likely that excavated material from the shaft and tunnel would represent a "significant proportion of overall recycled aggregate production in the region" and that it's likely that it will be taken to a facility capable of storing it, or gradual release to the market. Further information is requested with regards to the facilities which have been considered for storage, as the OWMP currently lacks this information. | | Suitable facilities are likely to be selected by the contractor from those included in Appendix 2. |
| | The Plan makes reference to some materials being re-used on-site. It is requested that National Grid provide an indication as to how much could be re- | | Noted. The assessment presented in Traffic and Transport chapter (Document 5.13) and the Transport Assessment (Document 5.13.2.1) |

| Table 1: Isle of Anglesey County Council | | | |
|--|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | used, as this will help to mitigate the off-site impacts on the highways, via a reduction in traffic movements and accord with sustainable development principles. | | accounts for all material leaving site. However if any can be retained, this will serve to reduce the effects. |
| | Section 6 confirms that recycling facilities and demand for recycled material in Anglesey and North Wales are limited, for example Section 6.4 refers to Rhuddlan Bach and Nant Newydd quarries as the only capacities on the island which can recycle and dispose of inert waste. It appears to be clear that the facilities do not have the capacity to accommodate large proportions (relative to the amount that will be generated by the Proposed Development during in the form of tunnel and shaft construction and after in the form of access track material) and it is considered likely that there will be a requirement to transfer materials off Anglesey for recycling/re-use. The chapter concludes that, due to the limited capacity for recycling and disposal on Anglesey, a proportion of the shaft and tunnel arisings would likely be taken to facilities in North Wales and North West England. Further information is requested in order to clearly understand how and where the excess material is likely to be managed and transported to. | | Likely facilities are identified in the OWMP/OMMP however flexibility needs to be retained to take account of changing circumstances and the potential for new opportunities to arise. |
| | Paragraph 6.9.5 refers to “an increasing awareness” amongst waste operators of the opportunities that may occur through a number of significant developments in the region. There is however no reference to specific opportunities and the lack of apparent strategy for managing the waste arisings (relating to 300,000 tonnes of tunnel and shaft excavation and the > 700,000 tonnes of temporary access track material once no longer needed) is of concern. | | See above |
| | Table 5.3 refers to National Grid’s proposal to re-use any topsoil that has been removed to make way for access tracks following reinstatement. It is not clear where this relatively significant amount of material is due to be stored. | | Topsoil would be primarily be reinstated. It would be stored immediately adjacent to the access track to ensure it would be returned to the same land parcel. |
| | The Outline Materials Management Plan provides general guidance on the re-use of materials however does not provide any further specific information to the OWMP. | | Noted |
| Question 2: Is the detail submitted adequate (i.e. i | See comments on Q1. | | Noted |
| Question 3: Is there anything missing? What | See comments on Q1. | | Noted |

| Table 1: Isle of Anglesey County Council | | | |
|---|---|----------------|------------------------------------|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| are the gaps? Do you have any views on the impact assessment by National Grid? | | | |
| Question 4: Are the mitigation proposals adequate and fit for purpose? | See comments on Q1 and the need for sign off by IACC given lack of detail at the current time. | | Noted |
| Question 5: Are there any changes or inconsistencies in the project detail following on from s42 or any Thematic Working Group? | N/A | | Noted |
| Volume 7 Other Documents – Outline Material Management Plan | | | |
| Question 1: Does the information provide sufficient detail/clarity on National Grid's proposal/position? | The document provides an insight as to the CL:AIRE Definition of Waste Code of Practise (DoWCoP) and the associated requirements with material management and Qualified Person assessments. | | Noted |
| | It is not an overarching MMP for the whole project and mostly deals with that of DoWCoP. There is greater depth and discussion regarding materials for the overall development within doc 7.5 Outline Waste Management Plan | | Noted |
| Question 2: Is the detail submitted adequate (ie in order to make an assessment?) | In relation to the CL:AIRE but could be deemed as confusing within the overall project. Would be better as a section within the 7.5 Outline Waste Management Plan. | | Noted |
| Question 3: Is there anything missing? What are the gaps? Do you have any views on the | No | | Noted |

| Table 1: Isle of Anglesey County Council | | | |
|---|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| impact assessment by National Grid? | | | |
| Question 4: Are the mitigation proposals adequate and fit for purpose? | As long as the CL:AIRE DoWCoP is adhered to | | Noted |
| | What other avenues have been considered if National Grid are not going down the CL:AIRE / DoWCoP route? | | CL:AIRE was considered to be the most appropriate route for the management of materials and therefore other avenues have not been considered. |
| Question 5: Are there any changes or inconsistencies in the project detail following on from s42 or any Thematic Working Group? | Yes, 1.1.10 – DoWCoP does not allow material to be sold back into market place. | | The amended OMMP has deleted this section of text. |
| | Suggest that this is considered outside the DoWCoP MMP and within an overarching MMP to form part of document 7.5 | | The OMMP includes all the excavated arisings that could be considered as materials. However, for clarity the OMMP it has been retained as a separate document. |

Page intentionally blank

3 Gwynedd Council

Page intentionally blank

| Table 2: Gwynedd Council | | | |
|---|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| Volume 5, Chapter 1: Introduction | | | |
| | No comments received | | |
| Volume 5, Chapter 3: Description of the Proposed Development | | | |
| | No comments received | | |
| Volume 5, Chapter 4, Construction, Operation, Maintenance and Decommissioning of the Proposed Development | | | |
| | No comments received | | |
| Volume 5, Chapter 6, EIA Methodology and Basis of Assessment | | | |
| | No comments received | | |
| Volume 5, Chapter 7: Landscape Assessment | | | |
| Does the information provide sufficient detail/clarity on National Grid's proposal/position? | Yes, in respect of the Design Measures (DM) mitigation built into the proposed development. | | Noted |
| | Not in respect of the Control and Management Measures (CMM) mitigation to reinstate the landscape following construction. | | The following CEMP (Document 7.4) measures apply: R1 All temporary working areas and accesses will be removed when construction of that stage of the works has been completed. Plant, temporary cabins and vehicles will be removed from the site. |

| Table 2: Gwynedd Council | | | |
|--|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | <p>Save for the actual Proposed Development and works forming part thereof, and also anything associated e.g. ground strengthening, all temporary land, including highways and public rights of way crossed by the works or other land temporarily occupied will be made good in consultation with landowners and/or the relevant highways authority.</p> <p>R2 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. Where required this will include a photographic record, written description and topographical survey, which will be used to ensure appropriate reinstatement of land.</p> |
| | Not in respect of Mitigation Measures (MM) as these are considered inadequate to alleviate the adverse landscape effects predicted. | | Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13) |
| Is the detail submitted adequate (i.e. in order to make an assessment)? | In general, the landscape assessment is adequately detailed. In particular, the scope, study area, methodology, basis of assessment and the baseline are broadly adequate. There are some outstanding issues not yet addressed from previous consultation, and additional comments responding to those matters and wider issues are included below. | | Noted |
| | There is no clear spatial information regarding existing landscape elements. The baseline section of the chapter should provide detailed and spatial information on existing landscape elements. The effects assessment should present similar detailed and spatial information on where and how these would be directly affected by the proposed development. The Council and (we anticipate) the Examining Panel during DCO Examination will need adequate detail on this in order to understand the magnitude of change to landscape elements and the consequent overall effect on character and how this has been assessed. | | An additional figure has been produced showing the existing landscape elements and the effects of the Proposed as Figure 7.17 (Document 5.7.1.17). |
| | Prior to the submission of the final Environmental Statement, it is requested that National Grid clarifies to the Council how the impacts on vegetation and other landscape elements is to be presented. | | As above |

| Table 2: Gwynedd Council | | | |
|--|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| Is there anything missing? What are the gaps? Do you have any view on the impact assessment by National Grid? | There are a number of areas where further information would be helpful. These have been set out below. | | See comments below |
| <u>Assessment of susceptibility of landscape receptors</u> | The assessment of susceptibility of landscape receptors is not considered to be robust and it is considered necessary for National Grid to revisit assessments on landscape receptor susceptibility throughout the chapter. | | See comments below |
| | For example, at 9.3.11 on pp 133, susceptibility of field boundaries is judged to be high ' <i>because their removal may be required to facilitate construction</i> '. This statement indicates that the field boundaries might experience change, which forms part of the assessment of magnitude. It is not relevant to judgements on the receptor's susceptibility to the type of change proposed. | | The methodology applies value, then susceptibility then magnitude. The wording of the final chapter has been updated to help clarify this approach. |
| | Another example of a questionable assessment of receptor susceptibility is at 9.3.2. The assessment should be made as to whether trees, as a landscape element in each Section or VSSA, are susceptible to change of the type proposed without undue consequences for the quantity, quality and condition of tree cover in the local area. | | As above |
| | <p>Para 4.5.15 of the Landscape Assessment, Document 5.7, refers to the GLVIA 3 definition of the susceptibility of landscape:</p> <p><i>"the ability of the landscape receptor... to accommodate the proposed development without undue consequences for the maintenance of the baseline situation and/ or the achievement of landscape planning policies and strategies".</i></p> <p>For instance, see hypothetical scenarios below intended to assist in illustrating this point about susceptibility assessment.</p> <p>In areas where a landscape is well vegetated and lots of good quality trees make an important contribution to its quality and character, then trees may be more susceptible.</p> | | As above |

| Table 2: Gwynedd Council | | | |
|---|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | On the other hand, in an area with few or no valued trees making any contribution to its identity, quality or overall character, susceptibility of trees to the proposed change might be lower. | | |
| Plans | Potential effects on landscape elements have been usefully summarised in Section 9.3 of Document 5.7. It is understood that the reinstatement (CMM) of landscape elements, as described in 7.20, is to be relied on as mitigation for direct effects on the landscape. Accordingly, it is considered essential that the reinstatement proposals are illustrated spatially on plans and accompanied by adequate design detail to ensure that the Council, the Examining Panel for the DCO and Secretary of State in reaching a decision have confidence that they can be delivered and will be effective over 15 years in restoring the fabric of the landscape to at least its current condition. | | 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). |
| | In advance of the final ES, it is considered essential that National Grid provide plans to the Council which show: Existing vegetation and other landscape elements to be protected and retained; Existing vegetation and other landscape elements that will be affected; and Mitigation and reinstatement proposals to alleviate effects. | | This information is shown on the Trees and Hedgerows Potentially Affected Plans (Document 4.11), the Figure 7.17 Effects on Landscape Elements (Document 5.7.1.17) and Figure 1 Reinstatement Plans (Document 7.4.1.1) |
| Combined effects | The scope of projects included in the inter project cumulative assessment appears adequate, however the information provided in Section 10 is very brief and judged to be incomplete. It is not possible, therefore, to offer meaningful comment on the cumulative effects assessment. Further comments on intra project and combined effects assessment have been provided in the review of Chapters 19 – 21. | | Section 10 of ES Chapter 8 (Document 5.8) has been updated to reflect updated information regarding Wylfa Newydd Power Station. |
| Are the mitigation proposals adequate and fit for purpose? | Mitigation measures around the THHs and CSEC at Ty Fodol and the substation extension at Pentir, shown on Documents 5.7.1.14-16, are considered adequate, however there are a number of areas where it is considered National Grid could go further: | | This information is shown on the Trees and Hedgerows Potentially Affected Plans (Document 4.11), the Figure 7.17 Effects on Landscape Elements (Document 5.7.1.17) and Figure 1 Reinstatement Plans (Document 7.4.1.1). Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13). |
| | There is considerable scope for additional tree planting and hedgerow planting and reinforcement at several locations along the route within the Order Limits. The Council considers it essential that more is made of this opportunity to alleviate adverse effects and to improve the condition and quality of the landscape along the route. The Council and advisors have previously highlighted potential areas for | | |

| Table 2: Gwynedd Council | | | |
|---------------------------------|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | such mitigation within and just beyond the Order Limits in an exchange of google earth .kmz files with National Grid's design team. | | |
| | The proposed reinstatement of landscape elements categorised as Control and Management Measures (CMM) are welcomed and considered to be essential to mitigate direct landscape effects. If, as stated in the header row of summary Table 7.25, these are relied upon as mitigation in the assessment of residual effects, more detailed information is required in plan to provide confidence that effects would be adequately mitigated. | | Reinstatement proposals are shown on Figure 1 Reinstatement Plans (Document 7.4.1.1). Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13). |
| | No off-site enhancement planting has been proposed. The Holford Rules are intended to inform routeing decisions based on (amongst other things) features of the existing landscape. They are intended to aid the design process by setting out which embedded or 'primary' design mitigation measures should be considered when routeing and designing a line to avoid effects at source. It is a logical extension therefore to use them also to guide the design of 'secondary' landscape mitigation in order to reduce unavoidable effects. | | Reinstatement proposals are shown on Figure 1 Reinstatement Plans (Document 7.4.1.1). Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13). |
| | <p>Paragraph 2.8.7 of 'EN 5 National Policy Statement for Electricity Networks Infrastructure' states that the Holford rules should be taken into account in considering the need for any additional mitigation:</p> <p><i>"The IPC should recognise that the Holford Rules, and any updates, form the basis for the approach to routeing new overhead lines and take them into account in any consideration of alternatives and in considering the need for any additional mitigation measures."</i></p> <p>Paragraph 2.8.11 states:</p> <p><i>"There are some more specific measures that might be taken, and which the IPC could require through requirements if appropriate, as follows:</i></p> <ul style="list-style-type: none"> <i>• Landscape schemes, comprising off-site tree and hedgerow planting are sometimes used for larger new overhead line projects to mitigate potential landscape and visual impacts, softening the effect of a new above ground line whilst providing some screening from important visual receptors. These can only be implemented with the agreement of the relevant landowner(s) and advice from the relevant statutory advisor may also be needed; and</i> | | Reinstatement proposals are shown on Figure 1 Reinstatement Plans (Document 7.4.1.1). Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13). |

| Table 2: Gwynedd Council | | | |
|--|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>● <i>Screening, comprising localised planting in the immediate vicinity of residential properties and principal viewpoints can also help to screen or soften the effect of the line, reducing the visual impact from a particular receptor.</i></p> <p>It is recommended therefore, that National Grid consider this National policy and guidance further in devising a more proportionate and meaningful mitigation strategy to include additional onsite mitigation and off site enhancements.</p> | | |
| | The assessment predicts significant permanent adverse effects on Caernarfon Coast & Plateau (Gwynedd LCA 4). It is not clear why National Grid has assessed effects on both VSAs and on LCAs, and whether this leads to a potential double counting of landscape effects. It is recommended that National Grid clarify this in the assessment | | 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 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 VSAs. |
| | The Council requests that these points are addressed in advance of DCO submission. | | Noted |
| Are there any changes or inconsistencies in the project detail following on from s42 or any Thematic Working Group? | <p>Yes. During the TWG meetings National Grid's landscape architect provided a series of google earth .kmz files showing trees and hedges which would be affected as well as proposed mitigation planting, but also suggested further mitigation and enhancement measures, some within the order limits and some off-site. As set out above, formalised versions of this information is considered essential to the DCO application process, but have not yet been provided.</p> <p>In Table 7.25, planting is considered as mitigation for construction effects. This is only possible if National</p> | | This information is shown on the Trees and Hedgerows Potentially Affected Plans (Document 4.11), the Figure 7.17 Effects on Landscape Elements (Document 5.7.1.17) and Figure 1 Reinstatement Plans (Document 7.4.1.1). Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13). |
| | In Table 7.25, planting is considered as mitigation for construction effects. This is only possible if National Grid is committing to implementing mitigation planting well in advance of construction. It is considered more appropriate to move mitigation description down to operational effects rows. | | Wording has been reviewed and addressed. |
| OVERALL CONCLUSION OF FACTUAL ASSESSMENT | In general, the early sections of the chapter are adequately detailed. In particular, the scope, study area, methodology, basis of assessment and the baseline are broadly adequate. The mitigation proposals at the tunnel head houses / CSECs and Pentir substation are considered adequate and proportionate to address local landscape effects. The following comments are noted: | | Noted |

| Table 2: Gwynedd Council | | | |
|--|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | The assessments on susceptibility of landscape receptors are not considered to be robust | | Additional clarity is provided in the chapter with regards to susceptibility. |
| | The baseline section should present existing landscape elements in detail on plan | | An additional figure has been produced showing the existing landscape elements and the effects of the Proposed as Figure 7.17 (Document 5.7.1.17). |
| | The effects assessment should show further detail in the form of plans which spatially depict existing landscape elements to be lost and retained | | This information is shown on the Trees and Hedgerows Potentially Affected Plans (Document 4.11). |
| | Further detail is required in the form of plans spatially depicting proposed landscape reinstatement mitigation proposals. | | 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). |
| Does the information provided in the documents adequately address the issues raised at Section 42 consultation? | No. See table below which includes an extract from Gwynedd Council's response to PEIR at Section 42: | | Noted |
| | <u>Issue:</u> Lack of information regarding embedded / primary mitigation measures proposed and construction mitigation measures <u>Resolved:</u> Not fully | | This is shown on CEMP Figure 1 Reinstatement Plans (Document 7.4.1.1). Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13). |
| | <u>Issue:</u> No secondary mitigation or enhancement measures presented <u>Resolved:</u> Not fully | | Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13). |
| | <u>Issue:</u> No specific judgements in respect of the Value and Susceptibility of the landscape leading up to baseline assessment of landscape sensitivity <u>Resolved:</u> Yes | | Noted |
| | <u>Issue:</u> Elements which make up landscape not clearly described or assessed in baseline | | This information is shown on Figure 7.17 Effects on Landscape Elements (Document 5.7.1.17). |

| Table 2: Gwynedd Council | | | |
|---------------------------------|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <u>Resolved:</u> No | | |
| | <u>Issue:</u> Structure of Landscape Baseline in respect of Section F differs from approach in other sections which makes the assessment hard to follow <u>Resolved:</u> Yes | | Noted |
| | <u>Issue:</u> PEIR assessment carried out on fewer and larger scale LCAs, considered essential that the EIA is carried out at finer LANDMAP Aspect area scale <u>Resolved:</u> Yes | | Noted |
| | <u>Issue:</u> 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. <u>Resolved:</u> Not fully | | Noted |
| | <u>Issue:</u> 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. <u>Resolved:</u> No | | Wording has been reviewed and addressed. |
| | <u>Issue:</u> 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 in order to make a judgement on whether localised effects on character of local landscape are significant <u>Resolved:</u> No | | The assessment assumes a worst case in which all excavated material is removed from site. |
| | <u>Issue:</u> Anticipated that some landscape mitigation would be provided to restore any damaged landscape elements particularly around Menai Strait and ancillary infrastructure <u>Resolved:</u> Not fully | | This is shown on CEMP Figure 1 Reinstatement Plans (Document 7.4.1.1). Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13). |

| Table 2: Gwynedd Council | | | |
|---|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p><u>Issue:</u> 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. Mitigation measure and cumulative impacts assessments must be adequately consulted on.</p> <p><u>Resolved:</u> Yes</p> | | Noted |
| As a result of the information provided in the Draft DCO Documents, are there any new issues (key strategic issues only) which need to be captured in the SOCG or GC's LIR? | New issues are set out in the table below. | | Noted |
| | <p><u>Issue:</u> Further landscape mitigation required</p> <p><u>Resolved/ explanation:</u> To alleviate predicted adverse landscape effects</p> | | This is shown on CEMP Figure 1 Reinstatement Plans (Document 7.4.1.1). Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13). |
| | <p><u>Issue:</u> Further detailed spatial information on reinstatement proposals (Control and Management Measures (CMM) mitigation)</p> <p><u>Resolved/ explanation:</u> To provide confidence that effects can be alleviated to the extent predicted</p> | | This is shown on CEMP Figure 1 Reinstatement Plans (Document 7.4.1.1). Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13). |
| | <p><u>Issue:</u> Proposals required for off-site planting</p> <p><u>Resolved/ explanation:</u> To provide enhancements to offset significant landscape and visual effects</p> | | Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13). |
| | <p><u>Issue:</u> Cumulative effects assessment is incomplete</p> | | The cumulative effects assessment has been updated in the final version of the chapter. |

| Table 2: Gwynedd Council | | | |
|--|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <u>Resolved/ explanation:</u> To understand the potential for cumulative effects and the need for associated mitigation | | |
| Volume 5, Chapter 8: Visual Assessment | | | |
| Does the information provide sufficient detail/clarity on National Grid's proposal/position? | Yes, in respect of the Design Measures (DM) mitigation built into the proposed development. | | Noted |
| | No, in respect of the Control and Management Measures (CMM) mitigation to reinstate the landscape following construction. | | This information is shown Figure 1 Reinstatement Plans (Document 7.4.1.1). |
| | No in respect of Mitigation Measures (MM) as these are considered inadequate to alleviate the adverse visual effects predicted. | | Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13). |
| Is the detail submitted adequate (i.e. in order to make an assessment)? | In general, the visual assessment is adequately detailed. In particular, the scope, study area, methodology, basis of assessment and the baseline are broadly adequate save any outstanding issues not yet addressed from previous consultation (see response to Question 6 below) and any specific additional comments below. | | Noted |
| | There is no clear spatial information regarding existing landscape elements. The Baseline section of the chapter should provide detailed and spatial information on existing landscape elements. The effects assessment should present similar detailed and spatial information on where and how these would be directly affected by the proposed development. The Council and it is anticipated the Examining Panel will need adequate detail on this in order to understand the magnitude of change to landscape elements and the consequent overall effect on views and how this has been assessed. | | An additional figure has been produced showing the existing landscape elements and the effects of the Proposed as Figure 7.17 (Document 5.7.1.17). |
| | Prior to the submission of the final ES, it is requested that National Grid clarifies how the impacts on vegetation and other landscape elements is to be presented. | | This information is shown on the Trees and Hedgerows Potentially Affected Plans (Document 4.11), the Figure 7.17 Effects on Landscape Elements (Document 5.7.1.17) and Figure 1 Reinstatement Plans (Document 7.4.1.1). |

| Table 2: Gwynedd Council | | | |
|--|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| Is there anything missing? What are the gaps? Do you have any view on the impact assessment by National Grid? | | | |
| <u>Plans</u> | Potential effects on vegetation and boundaries have not been shown in plan or described in any detail in the assessment. It is understood that the reinstatement (CMM) of landscape elements has not been relied upon as mitigation for visual effects. | | This information is shown on the Trees and Hedgerows Potentially Affected Plans (Document 4.11), the Figure 7.17 Effects on Landscape Elements (Document 5.7.1.17) and Figure 1 Reinstatement Plans (Document 7.4.1.1). |
| | It is considered essential that the reinstatement proposals are illustrated spatially on plans and accompanied by adequate design detail to offer the Examining Panel and the Council an understanding of whether they can be delivered and will be effective over 15 years in restoring the character of views to at least current conditions. | | This information is shown on Figure 7.17 Effects on Landscape Elements (Document 5.7.1.17) and Figure 1 Reinstatement Plans (Document 7.4.1.1). |
| | Replacement tree and hedgerow planting as part of the reinstatement proposals will make a considerable contribution to repairing visual damage caused by construction and would provide some level of mitigation for local views. | | This information is shown on Figure 7.17 Effects on Landscape Elements (Document 5.7.1.17) and Figure 1 Reinstatement Plans (Document 7.4.1.1). |
| | It is considered essential therefore that National Grid provide plans for consultation in advance of the final ES, which show: Existing vegetation and other landscape elements to be protected and retained; Existing vegetation and other landscape elements that will be affected; and Mitigation and reinstatement proposals to alleviate effects. | | This information is shown on the Trees and Hedgerows Potentially Affected Plans (Document 4.11), the Figure 7.17 Effects on Landscape Elements (Document 5.7.1.17) and Figure 1 Reinstatement Plans (Document 7.4.1.1). Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13). |
| Residual effects | There are several significant adverse residual effects predicted that do not appear to have been addressed through mitigation. It is considered that National Grid should undertake further work to design onsite mitigation, reinstatement and off site enhancement measures to address these or demonstrate reasonable and justifiable constraints to their delivery. | | Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13). |
| Value assessments | The value of visual receptors is assessed and reported in adequate detail within this document. It is not considered necessary to also provide an assessment of the | | The Viewpoint Assessment Sheets in Appendix 8.2 (Document 5.8.2.2) have been checked for consistency with the other |

| Table 2: Gwynedd Council | | | | | | | | | | | |
|---------------------------------|---|----------------|---|-----------------|------|---------------------------|--------|-------------------------------|--------|--|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed | | | | | | | | |
| | <p>value of views from each viewpoint in the Viewpoint assessment sheets. The value of the view depends on the receptor experiencing it from that representative viewpoint. For example Vp 1/02 is identified on the corresponding Viewpoint Assessment Sheet to be of Medium value. However, it represents the following three groups of receptors each with its own Value assessed in the chapter text, which is confusing:</p> <table><tr><th>Receptor group</th><th>Value</th></tr><tr><td>Local Community</td><td>High</td></tr><tr><td>Users of the Road Network</td><td>Medium</td></tr><tr><td>Users of Public rights of way</td><td>Medium</td></tr></table> <p>It is recommended that the value assessment is either taken off the Viewpoint Assessment sheets or it is broken down by receptor type.</p> | Receptor group | Value | Local Community | High | Users of the Road Network | Medium | Users of Public rights of way | Medium | | assessments. The value stated on the viewpoint sheets is specific to that viewpoint and does not change on the viewer. However, aggregated views for a receptor e.g. a local community, may be higher or lower than one viewpoint individually. Text has been added to the assessment to clarify where this is the case. |
| Receptor group | Value | | | | | | | | | | |
| Local Community | High | | | | | | | | | | |
| Users of the Road Network | Medium | | | | | | | | | | |
| Users of Public rights of way | Medium | | | | | | | | | | |
| <u>Combined effects</u> | The scope of projects included in the inter project cumulative assessment appears adequate. However, the information provided in Section 10 is very brief and we believe is incomplete. Therefore, it is not possible to offer meaningful comment on the cumulative effects assessment at this time. | | Section 10 has been updated in the final chapter. | | | | | | | | |
| | Comments on intra project and combined effects assessment have been provided in the review of Chapters 19 – 21. | | Noted | | | | | | | | |
| | At paragraph 4.8.17, for the in-combination assessment where significant effects are predicted for one development in combination with insignificant effects from another, cumulative effects have been attributed to the projects giving rise to the more significant effect. It is understood how effects might be more attributable to one development than another, but it is not clear how they could be attributable to only one development. The Council would maintain that focus is given to identifying which development gives rise to cumulative effects and also ensuring that commentary is available on whether there would be cumulative effects on views (or the character of the landscape) and how significant they would be. The apportionment of the effect is likely to be of value for discussions around wider cumulative mitigation. | | Section 10 of ES Chapter 8 (Document 5.8) has been updated to reflect a modified methodology. | | | | | | | | |

| Table 2: Gwynedd Council | | | |
|---|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| Are the mitigation proposals adequate and fit for purpose? | Mitigation measures around the THHs and CSECs at Ty Fodol and the substation extension at Pentir, shown on Documents 5.7.1.14-16 are considered adequate, however there are a number of areas where it is considered National Grid could go further and this would be recommended: | | Noted |
| | There is considerable scope for additional tree planting and hedgerow planting and reinforcement at many locations along the route within the Order Limits. The Council considers it essential that more is made of this opportunity to alleviate adverse effects and to improve the condition and quality of the landscape and views along the route. The Council and their advisors have previously highlighted potential areas for such mitigation within and just beyond the Order Limits in an exchange of google earth .kmz files with National Grid's design team. | | This information is shown on the Trees and Hedgerows Potentially Affected Plans (Document 4.11), the Figure 7.17 Effects on Landscape Elements (Document 5.7.1.17) and Figure 1 Reinstatement Plans (Document 7.4.1.1). Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13). |
| | The proposed reinstatement of landscape elements categorised as Control and Management Measures (CMM) are welcomed and considered to be essential in the context of effects arising from the proposed development. If, as stated in the header row of summary Table 8.67, these are relied upon as mitigation in the assessment of residual effects, further more detailed information is required in plan form to provide confidence that effects would be adequately mitigated. | | Reinstatement proposals are shown on Figure 1 Reinstatement Plans (Document 7.4.1.1). Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13). |
| | No off-site enhancement planting has been proposed. The Holford Rules are intended to inform and guide routeing decisions based on (amongst other things) features of the existing landscape. They are intended to aid the design process by setting out which embedded or 'primary' design mitigation measures should be considered when routeing and designing a line to avoid effects at source. It is a logical extension therefore to use them also to guide the design of 'secondary' landscape mitigation in order to reduce unavoidable effects. | | Reinstatement proposals are shown on Figure 1 Reinstatement Plans (Document 7.4.1.1). Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13). |
| | <p>Paragraph 2.8.7 of 'EN 5 National Policy Statement for Electricity Networks Infrastructure' states that the Holford rules should be taken into account in considering the need for any additional mitigation:</p> <p><i>"The IPC should recognise that the Holford Rules, and any updates, form the basis for the approach to routeing new overhead lines and take them into account in any consideration of alternatives and in considering the need for any additional mitigation measures."</i></p> <p>Paragraph 2.8.11 states:</p> | | Reinstatement proposals are shown on Figure 1 Reinstatement Plans (Document 7.4.1.1). Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13). |

| Table 2: Gwynedd Council | | | |
|--|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p><i>“There are some more specific measures that might be taken, and which the IPC could require through requirements if appropriate, as follows:</i></p> <ul style="list-style-type: none"> <i>• Landscape schemes, comprising off-site tree and hedgerow planting are sometimes used for larger new overhead line projects to mitigate potential landscape and visual impacts, softening the effect of a new above ground line whilst providing some screening from important visual receptors. These can only be implemented with the agreement of the relevant landowner(s) and advice from the relevant statutory advisor may also be needed; and</i> <i>• Screening, comprising localised planting in the immediate vicinity of residential properties and principal viewpoints can also help to screen or soften the effect of the line, reducing the visual impact from a particular receptor.”</i> <p>It is therefore recommended that National Grid consider this national policy and guidance further in devising a more proportionate and meaningful mitigation strategy to include additional onsite mitigation and off site enhancements.</p> | | |
| | The Council requests that these points are addressed in advance of DCO submission. | | |
| Are there any changes or inconsistencies in the project detail following on from s42 or any Thematic Working Group? | There are a number of inconsistencies within the chapter which need addressing in the final ES. | | Inconsistencies have been removed in the final chapter. |
| | Para 11.2.4 and the bullet points below qualify the assessment findings by describing parts of communities with different levels of effect. This is not described clearly enough in the text and perhaps a better way of articulating this would be on a set of colour visual effects plans showing which areas and which receptors would receive which levels of effects. | | This information is now presented on Figure 8.7 (Document 5.8.1.7) |
| | Table 8.38 predicts a variety of magnitudes of change to VPs ranging from low to medium/high. The corresponding entry in Table 8.67 correctly assesses major significant effects. However, the text in para 9.3.238 describes medium to low magnitudes of change and minor (not significant) effects. | | Inconsistencies have been addressed in the final chapter |

| Table 2: Gwynedd Council | | | |
|---|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | It is recommended that the summary table is cross checked for each receptor group to ensure consistency across the assessment. | | Inconsistencies have been addressed in the final chapter |
| | During the TWG meetings National Grid's landscape architect provided a series of google earth .kmz files showing trees and hedges which would be affected as well as proposed mitigation planting, but also suggested further mitigation and enhancement measures, some within the order limits and some off-site. As set out above, formalised versions of this information are considered essential to the DCO application process, but have not yet been provided. Notably, the areas of trees shown in the .kmz files as 'to be affected' considerably exceed the 0.7ha of proposed tree planting. | | This information is shown on the Trees and Hedgerows Potentially Affected Plans (Document 4.11), the Figure 7.17 Effects on Landscape Elements (Document 5.7.1.17) and Figure 1 Reinstatement Plans (Document 7.4.1.1). Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13). |
| OVERALL CONCLUSION OF FACTUAL ASSESSMENT | In general, the early sections of the visual chapter are adequately detailed. In particular, the scope, study area, methodology, basis of assessment and the baseline are broadly adequate. In addition, mitigation proposals at tunnel head houses / CSECs and Pentir Substation is adequate and proportionate to address local visual effects predicted within National Grid's assessment. The following points are noted: | | Noted |
| | There are a number of inconsistencies between magnitudes of change and significance ratings identified in the assessment tables throughout the chapter. These will need to be addressed in the final ES | | Wording has been updated to remove inconsistencies. |
| | It is recommended that the assessments of receptor value are either omitted from, or further articulated into receptor types, on the Viewpoint Assessment Sheets | | Receptor values have now been removed. |
| | The baseline section needs to present existing landscape elements in detail on plan | | This is now shown on Figure 7.17 Effects on Landscape Elements (Document 5.7.1.17). |
| | The effects assessment needs to present further detail in the form of plans spatially depicting existing landscape elements to be lost and retained | | This information is shown on the Trees and Hedgerows Potentially Affected Plans (Document 4.11), the Figure 7.17 Effects on Landscape Elements (Document 5.7.1.17) and Figure 1 Reinstatement Plans (Document 7.4.1.1). |
| | Further detail is required in the form of plans spatially depicting proposed landscape reinstatement mitigation proposals. | | As above |

| Table 2: Gwynedd Council | | | |
|---|---|----------------|------------------------------------|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| Does the information provided adequately address the issues raised at Section 42 consultation? | No. See table below which includes the issues raised by Gwynedd Council at Section 42 consultation: | | See below |
| | <u>Issue:</u> Unclear how temporary and permanent vegetation loss as a result of construction activity will be considered in the assessment <u>Resolved:</u> Yes | | Noted |
| | <u>Issue:</u> Consultation on Environmental Strategy and Masterplan (yet to be seen) <u>Resolved:</u> No | | Noted |
| | <u>Issue:</u> 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. <u>Resolved:</u> Yes | | Noted |
| | <u>Issue:</u> No methodology has been presented for the assessment of residential amenity, which will feed into the Residential Amenity Assessment <u>Resolved:</u> Yes | | Noted |
| | <u>Issue:</u> 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 <u>Resolved:</u> Yes | | Noted |
| | <u>Issue:</u> 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. | | Noted |

| Table 2: Gwynedd Council | | | |
|--|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <u>Resolved:</u> Yes | | |
| As a result of the information provided in the Draft DCO Documents, are there any new issues (key strategic issues only) which need to be captured in the SOCG or GC's LIR? | <u>Issue:</u> Further Landscape mitigation required <u>Resolved/ explanation:</u> To alleviate predicted adverse visual effects | | Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13). |
| | <u>Issue:</u> Further detailed spatial information on reinstatement proposals (Control and Management Measures (CMM) mitigation) <u>Resolved/ explanation:</u> To provide confidence that visual damage to the landscape and views can be alleviated to the extent required. | | This information is shown on Figure 1 Reinstatement Plans (Document 7.4.1.1). |
| | <u>Issue:</u> Proposals required for off-site planting <u>Resolved/ explanation:</u> To provide enhancements to offset significant visual effects | | Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13). |
| | <u>Issue:</u> Cumulative effects assessment is incomplete <u>Resolved/ explanation:</u> To understand the potential for cumulative effects and the need for associated mitigation. | | Section 10 of the chapter has been updated. |
| Volume 5, Chapter 9, Ecology and Nature Conservation | | | |
| Does the information provide sufficient detail/clarity on National Grid's proposal/position? | Yes, in terms of Description of Development and Design Measures (DMs) Mitigation built into the Project. Baseline data presentation appears to be an adequate reflection of survey work undertaken to date (though some bat data still missing and it is expected that this would be provided on DCO submission). | | Noted |
| | No, in terms of Mitigation Measures (MMs) provided for various receptors, where MMs proposed are either poorly described, rely on generic text with no specific | | More detail is included in the BMS (Document 7.7), however for most effects on habitats and species there is a reliance on the |

| Table 2: Gwynedd Council | | | |
|--|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | details, where delivery is uncertain and indeed where MMs are absent entirely. The approach to avian collision risk is of a particular concern; modelling was not expected, but National Grid appears to have not adopted a precautionary approach as recommended by guidance and has effectively ignored the issue entirely. This matter requires addressing prior to DCO submission. | | <p>generic mitigation measures. There are some bespoke measures included where required. The amount of information provided is considered sufficient to conclude on significance for the receptors identified. Further information is provided in the CEMP (Document 7.4) and BMS (Document 7.7).</p> <p>Collision has not been ignored. The assessment has considered collision risk for all relevant species. Additional information is discussed below and provided where appropriate within ES Chapter 9, Ecology and Nature Conservation (Document 5.9) and Appendix 9.15 Ornithological Assessment Report (Document 5.9.2.15). SNH guidance² recommends designing the route alongside any existing lines, which has been undertaken for the majority of the Proposed Development.</p> |
| | There are also various references to the Biodiversity Mitigation Plan (Document 7.9) which has not been provided to the Council for review; this is seen as a significant omission and we would note is likely to address many of the concerns identified here, and will form part of the CEMP. Not providing it as part of the ES review leaves significant gaps and causes for concern at this time. | | <p>The BMS (Document 7.7) is a stand-alone document and does not form part of the CEMP (Document 7.4).</p> <p>It is also considered that sufficient information about mitigation is provided in ES Chapter 9, Ecology and Nature Conservation (Document 5.9) in order to understand how residual effects have been assessed, without the document becoming disproportionately large and complex.</p> |
| | Likewise, there is reference to the Enhancement Strategy (7.18) but this has also not been provided to the Council for review; therefore, none of the beneficial actions discussed at TWGs to date are detailed and therefore we cannot have confidence that firm commitments are being made by National Grid at this time. | | The Enhancement Strategy is presented as Document 7.13 . |
| Is the detail submitted adequate (i.e. in order to make an assessment)? | Overall, the level of detail submitted is as expected and adequate to allow ecological assessment to take place (noting the limitations above). The baseline surveys followed agreed methods and study areas considered are appropriate. These reflect discussions to date via the ecology TWG. | | Noted |

² SNH (2016): Assessment and mitigation of impacts of power lines and guyed meteorological masts on birds. Version 1, July 2016

| Table 2: Gwynedd Council | | | |
|--|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | Further detail is requested in respect of the cumulative impact assessment to provide justification for significance of effects. This should be addressed ahead of final submission and shared with GC. | | Noted |
| Is there anything missing? What are the gaps? Do you have any view on the impact assessment by National Grid? | Yes. There are various examples of where National Grid, using a methodology that does not follow CIEEM guidance (which is allowable, but adds confusion in places) predicts impacts that we believe may be too low. For example, habitat fragmentation effects on great crested newt populations are assessed as low impact in 9.6.94 without supporting data / evidence to reach this conclusion. | | Without specific examples of where Gwynedd Council consider this may apply it is not possible to provide a detailed response. However, it is not considered that the approach adopted predicts impacts of lower significance than CIEEM approach would as the approach used follows the latest CIEEM guidance of not using a matrix-type approach and instead uses qualitative assessments when this is possible, together with reasoning and professional judgement. |
| | Whilst discussed in the text, it would be helpful to have a clear table that shows habitat losses and gains to help understand the overall impact and potential to deliver net positive effects for biodiversity. | | Although details of the loss of each habitat are provided under each habitat assessed, an overall habitat loss calculation table has been included within section 9.5 of ES Chapter 9, Ecology and Nature Conservation (Document 5.9). |
| | The impact assessment for bats is also too basic; more details are needed on the overall foraging habitat losses during construction, including clear figures that accompany the ES; fragmentation and loss of hedgerow sections should be more detailed. Likewise, the loss of edge habitat foraging around woodlands should be considered in more detail, notably around ancient woodland (9.6.38). Details of how topsoil stores will be seeded or managed for bats should be included where these persist in the landscape for long periods of time. | | Hedgerow and tree loss are shown on the Trees and Hedgerows Potentially Affected Plans (Document 4.11) which have been referenced within the chapter. An overall habitat loss calculation table has been included within section 9.5 of ES Chapter 9, Ecology and Nature Conservation (Document 5.9), reference to which has been made within the bat assessment, indicating those most important to bats. The Chapter and BMS (Document 7.7) currently advise on the use of appropriate seeding and herbicides for storage of soils in relation to what is appropriate for the habitat type. |
| | The overall approach to avian collision risk is questioned. Although modelling is not recommended, latest SNH guidance ³ states: <i>"In recognition of the difficulty this presents (lack of accepted model) we recommend that emphasis is put on mitigation where surveys indicate potential conflicts"</i> | | Any potential risks have been stated within section 9 of ES Chapter 5.9, Ecology and Nature Conservation (Document 5.9) and associated Appendix 9.15 Ornithological Assessment Report (Document 5.9.2.15). This concludes that there are no significant effects for collision that would require mitigation. |

³ Scottish Natural Heritage: Assessment and mitigation of impacts of power lines and guyed meteorological masts on birds: Guidance. Version 1. July 2016.

| Table 2: Gwynedd Council | | | |
|---|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | Guidance suggests several mitigation measures, including undergrounding and: <i>“Installing line markers on earth wires and/or conductors as appropriate to reduce collision”.</i> | | |
| | For many species, despite a high percentage of flights recorded at collision height, National Grid regularly state risks are low. For example, for cormorant, and SPA feature species, although 92 flight lines were recorded, with 81.5% at collision height, in 9.7.52 we are told that numbers are low which indicates baseline risk of collision for the species is also low. We suggest further discussion with NRW on this approach enabling more confidence to be reached in these statements. | | Any potential risks and the means by which such risks have been calculated have been stated within section 9 of ES chapter 5.9, Ecology and Nature Conservation (Document 5.9) and associated Appendix 9.15 Ornithological Assessment Report (Document 5.9.2.15). This concludes that there are no significant effects for collision that would require mitigation. |
| | Despite the significant material provided in the avian baseline report, no key hotspots of flight activity are identified where mitigation measures may be appropriate. | | As above |
| | Regarding terrestrial invertebrates, the impact assessment is very simplistic and does not take account of habitat requirements or larval food plants for key species (9.6.125), for example the butterflies listed in 7.7.82 recorded during baseline surveys. | | Red data book status was included in the baseline report Appendix 9.14 Terrestrial Invertebrate Report (Document 5.9.2.14). Further discussion has been added. Habitat requirements are also discussed in the baseline report. |
| | Throughout the document, there are consistency errors and mistakes which add confusion; for example, whooper swan are stated to be of National value in 7.8.13; but only of County value in 9.7.7. Associated conclusions on impact should be checked throughout. | | Any inconsistencies have been addressed in the final ES chapter. |
| Are the mitigation proposals adequate and fit for purpose? | Overall, mitigation proposals outlined in the ES are generic and the typical minimum that would be expected for most effects; these lack detail, possibly relying on that which might be more detailed within the Biodiversity Mitigation Plan (Document 7.9), but this has not been provided. Likewise, no enhancement measures are set out, but reference is made to the Enhancement Strategy (Document 7.18) (although this is also missing). Significantly, none of the enhancements discussed in TWGs to date are mentioned within the chapter. The Council would wish to engage further on these matters in order to have confidence in their delivery. | | Enhancement opportunities are not included in the chapter, as they are not required to mitigate effects. Further details of mitigation are provided in the Biodiversity Mitigation Strategy (Document 7.7) and enhancements within the Enhancement Strategy (Document 7.13). |

| Table 2: Gwynedd Council | | | |
|---------------------------------|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | Section 9.1.4 refers to transplanting botanical species of importance, but the type, location and quantum of these is not identified. This further information is sought at DCO submission. | | No species have been identified that would require translocation. This measure was included to allow for circumstances should species needing translocation be found in the future. Reference is made within the Biodiversity Mitigation Strategy (Document 7.7). |
| | The chapter sets out a range of general mitigation measures relevant to ecological effects in Table 9.21. These are generally acceptable, but the following are questioned: BNC 28 refers to obvious mammal trails being kept clear with badger gates installed in fencing; how will these be determined and installed? Does this need to be covered within a badger licence? | | This would not be a licensable activity. The paths would be identified by the ECoW onsite, and they would determine if/where gates need to be installed. This approach is set out in the BMS (Document 7.7) |
| | BNC29, we question the statement that larger excavations will be protected with badger proof fencing; this is unlikely to be practical, digging in fencing to below 1m depth around temporary excavations each day? | | Wording has since been updated |
| | BNC210, why are winter works/vegetation removal in watercourses barred in winter? And if this is the case, the next bullet point bars such works in sensitive months such as spawning? These measures would suggest working in water will not be possible for most/all of the year? | | This wording has been removed |
| | In addition to CEMP measures, the chapter sets out basic mitigation measures in coloured boxes for each valued ecological receptor. Whilst these are welcomed, there is again a lack of detail, with location, timings and delivery responsibilities unclear. The following specific comments are made: | | It is confirmed that the detail is provided in the BMS (Document 7.7). |
| | Impacts to other CWSs (9.3.88): Likewise, losses to other sites including Coed Rhos-fawr CWS are a concern, as over sailing OHLs will require habitat modification of important woodland underneath; MMs are poorly developed and statement that no net loss of trees will occur needs supporting evidence, especially to prove the point habitat connectivity will be maintained. Percentage habitat losses at all four CWSs in this section should be presented. | | Losses to CWS have been added into Chapter 9 Ecology and Nature Conservation (Document 5.9). Mitigation measures are detailed in the BMS (Document 7.7) |
| | 9.4.20 refers to long-term habitat management of woodland areas; this is welcomed but what is long-term? Standard five year management aftercare period will be inadequate. | | An outline of the management plan is included in the Biodiversity Mitigation Strategy (Document 7.7); the full management plan will be provided post submission. |

| Table 2: Gwynedd Council | | | |
|---------------------------------|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | |
| | 9.4.46 refers to avoiding use of weed killer on top soil; will this actually be used or will such practices be prohibited? | | This point has been clarified. More details are included in the Biodiversity Mitigation Strategy (Document 7.7). |
| | Regarding heathland losses at Pentir (9.4.7) what are the proposals for habitat replacement or improvement? And what species sensitive to correct orientation are present – these are not covered in baseline results? | | Ecological mitigation is summarised in the ecology chapter 5.9, Ecology and Nature Conservation (Document 5.9), and detailed in the BMS (Document 7.7); however the area of affected heathland does not fall within the compound, will not be affected permanently and will be reinstated on completion. |
| | Hedgerows: Losses are totalled but it is unclear what replacement/ additional lengths will be provided. | | This information is shown on the Trees and Hedgerows Potentially Affected Plans (Document 4.11), the Figure 7.17 Effects on Landscape Elements (Document 5.7.1.17) and Figure 1 Reinstatement Plans (Document 7.4.1.1). |
| | Bat mitigation measures (9.4.61): Concern is raised over the fact that hedgerow and woodland habitat losses may not be replaced in situ, leading to loss of useful foraging habitat and fragmentation. Details of bat box numbers and location are not specified. No monitoring proposals are set out (this applies for most receptors subject to impact). Overall bat mitigation measures need more details we would welcome sight of a draft licence application for this species that should include such details. | | <p>With the exception of woodland and trees, habitat replacement would be in situ as it would be replaced on a like for like basis for temporarily affected areas and improved for permanently affected areas as stated in section 9 of ES chapter 9, Ecology and Nature Conservation (Document 5.9). Woodland and trees are more difficult to replace in situ due to operational restrictions resulting from the OHL, but as stated are in close proximity where at all possible.</p> <p>Details of bat boxes and monitoring of these are given in the Biodiversity Mitigation Strategy (Document 7.7) and will be included in the management plan for the covert and the bat licence.</p> <p>Draft licences will be developed during the examination process along with the full management plan.</p> |
| | 9.6.77, we question the merits of trying to maintain brown hare and polecat access through fencing across working areas; unlike badgers these animals will not follow set paths so frequently and could become entrapped. | | This reference has been removed from the chapter. The majority of fencing, other than in GCN mitigation areas, would be post and wire and therefore crossable by mammals. |

| Table 2: Gwynedd Council | | | |
|---------------------------------|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | 9.6.21, why would hibernacula be created at Pentir and Gylched Covert? Overall great crested newt mitigation measures need more details and GC would welcome sight of a draft licence application for this species that should include such details. | | Hibernacula creation was generic text that has now been removed in relation to GCN although these features would be of benefit for this species should they move into this area. This comment references the wrong paragraph (9.6.91). |
| | 9.6.113, reptile mitigation: There is reference to moving animals to suitable remaining habitat, but this is unquantified and the extent and ownership is unknown, so it is hard to determine if habitat is of quality and carrying capacity to receive animals or be secure in the long-term. | | <p>Details are provided in the Biodiversity Mitigation Strategy (Document 7.7).</p> <p>The assessment has identified very small numbers of reptiles and habitat destruction would mostly be of sub-optimal habitats. As such there is limited risk as small numbers of animals would move from one sub-optimal habitat to one that is immediately adjacent. It is not considered necessary to have landowner permission to allow this, though it is likely that most movements would be within the Order Limits anyway. For example for the area near to Pentir an area has been included in the Schedule of Environmental Commitments (Document 7.4.2.1) to ensure it is free from construction works and landscape mitigation planting in the form of woodland.</p> |
| | 9.6.128: States that a programme of works would include for appropriate timing of clearance of vegetation for invertebrates. What exactly is this? | | This measure was not required to address any potentially significant effects and so has been removed from the chapter. |
| | 9.6.154: We question how practical checking watercourse crossing locations for fish spawning habitat will be ahead of construction and its presence forcing redesign of works; such habitats are unlikely to change between now and construction? | | A comment has been added to clarify that where pre-construction surveys are noted, these can occur between pre-submission to immediately prior to works on site, as appropriate. As such, these surveys would inform detailed design. |
| | Mitigation measures for birds in general, and species including whooper swan in particular, dismiss collision risk as described above. No consideration of marking lines in key areas; no monitoring proposals are included. This is not considered adequate. | | Collision risk has been assessed and is therefore not dismissed; however no significant effects have been identified, which is why bird diverters are not considered necessary. ES Chapter 9 Ecology and Nature conservation (Document 5.9) text has been amended to provide more details where appropriate. |
| | Noting that no works are proposed below MHWS, in the event vessels are required for any activities during construction they should be subject to strict biosecurity protocols to avoid the spread of invasive alien marine species, including the | | Due to the potential requirement for use of a vessel within the Menai Strait, appropriate biosecurity measures have been added to the CEMP (Document 7.4) and BMS (Document 7.7). |

| Table 2: Gwynedd Council | | | |
|--|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | invasive sea squirt <i>Didemnum vexillum</i> known to occur in Holyhead Harbour, as detailed in the HRA for the marine GI works. | | |
| | <p>A cumulative assessment is provided within the chapter which is welcomed. However, the following comment is made:</p> <p>There are numerous examples of where the chapter states that a 'no significant' effect from the project alongside another no significant effect on the same receptor from another project cannot create a significant cumulative impact; this is not the case and each such effect should be looked at in detail to consider if together they could raise the overall level of impact to a level that could be significant, for example for otter (10.3.27).</p> | | The cumulative assessment takes this approach when one or other of the effects alone is negligible, as it is not considered likely that negligible effects could generate a cumulative effect, given that they are 'barely perceptible'. This approach is not taken where it is simply 'not significant' as it is recognised that there is a potential for two minor effects to have a significant cumulative effect. |
| Are there any changes or inconsistencies in the project detail following on from s42 or any Thematic Working Group? | No significant changes for the Gwynedd section of the project are presented. | | Noted |
| OVERALL CONCLUSION OF FACTUAL ASSESSMENT | In general, the early sections of the ecology and nature conservation chapter are adequately detailed. In particular, the scope, study area, methodology, basis of the assessment and baseline are broadly acceptable, subject to points raised above. | | Noted |
| | The impact assessment is questioned for various receptors, including disagreement on sensitivity in some cases. | | Noted |
| | Mitigation proposals are only outlined in the chapter and appear to rely on details in documents not yet provided that has hindered a detailed review of this topic. | | Noted |
| | Those mitigation measures outlined appear generic and do not appear to address several issues. | | Further detail is provided in the BMS (Document 7.7). |

| Table 2: Gwynedd Council | | | |
|--|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | The mitigation planting proposed at just four locations along the OHL route is disproportionately low in quantum and inadequate to alleviate predicted effects for various receptors. | | Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13). |
| | Avian collision risk has been dismissed as not significant; this is questionable and further discussion with NRW ornithologists is suggested. | | The assessment has considered collision risk for all relevant species. Additional information is discussed below and provided where appropriate within ES Chapter 9, Ecology and Nature Conservation (Document 5.9) and Appendix 9.15 Ornithological Assessment Report (Document 5.9.2.15). SNH guidance ⁴ recommends designing the route alongside any existing lines, which has been undertaken for the majority of the Proposed Development. |
| | Impacts to woodland CWSs, including ancient woodland, are also a concern as mitigation proposals are insufficiently detailed to support conclusions of no significant effects. | | See above |
| | Conclusions over no net loss for biodiversity are unsupported at this stage. | | ES Chapter 9 Ecology and Nature Conservation (Document 5.9) now provides details of habitat losses and gains. |
| | There is a total lack of any enhancement measures for wildlife; if the project is to deliver a positive legacy, these should be clearly set out and captured via obligation under agreements. | | Enhancement opportunities are discussed in the Enhancement Strategy (Document 7.13). |
| Does the information provided adequately address the issue raised by Gwynedd Council at Section 42? | | | |
| See table below which includes an extract from Gwynedd Council's response to PEIR at Section 42: | <p>Issue raised at s42</p> <p>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</p> | | The assessment has considered collision risk for all relevant species. Additional information is discussed below and provided where appropriate within ES Chapter 9, Ecology and Nature Conservation (Document 5.9) and Appendix 9.15 Ornithological Assessment Report (Document 5.9.2.15). SNH guidance recommends designing the route alongside any existing lines, |

⁴ SNH (2016): Assessment and mitigation of impacts of power lines and guyed meteorological masts on birds. Version 1, July 2016

| Table 2: Gwynedd Council | | | |
|---------------------------------|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>guidance on avian collision and overhead lines¹. This will enable a more robust assessment of potential collision risk to key species</p> <p>Addressed?</p> <p>No. As per detailed comments, although CRM was not expected, approach to collision risk assessment and conclusions are questioned. Requires further discussion with NRW before agreement on results can be made.</p> | | which has been undertaken for the majority of the Proposed Development. |
| | <p>Issue raised at s42</p> <p>Net biodiversity gain under PPW guidance. Further details expected in ES in addition to complete details on how such gains will be delivered in DCO application</p> <p>Addressed?</p> <p>No. Information supplied to date is not sufficiently detailed to support contention of no net loss.</p> | | A table of habitat losses and gains is now provided in Chapter 9 Ecology and Nature Conservation (Document 5.9). Potential biodiversity enhancement are discussed in the Enhancement Strategy (Document 7.13) |
| | <p>Issue raised at s42</p> <p>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</p> <p>Addressed?</p> <p>Yes. Section by section approach has been abandoned and Project wide impacts on receptors have been considered.</p> | | Noted |
| | <p>Issue raised at s42</p> <p>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 | | Noted |

| Table 2: Gwynedd Council | | | |
|---------------------------------|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>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.</p> <p>Addressed?</p> <p>N/A. These relate to wording in PEIR that has been superseded by ES. Specific issues around these topics are included in our response on these documents.</p> | | |
| | <p>Issue raised at s42</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> <p>Addressed?</p> <p>No. As per detailed comments, mitigation is still lacking in detail and Biodiversity Mitigation Plan is missing.</p> | | Additional detail is provided in the Biodiversity Mitigation Strategy (Document 7.7). However the information in the chapter is considered sufficient to be able to conclude residual effects. |
| | <p>Issue raised at s42</p> <p>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.</p> <p>Addressed?</p> <p>Yes. Overall approach to impact assessment is acceptable.</p> | | Noted |
| | <p>Issue raised at s42</p> <p>The Council notes that from an ecological perspective, the effects termed “intra-project cumulative effects” are simply project level effects, and expects that where interdependencies exist between topics, these are assessed in a defined place</p> | | Noted |

| Table 2: Gwynedd Council | | | |
|---------------------------------|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>within the ES and cross-referenced appropriately to ensure a robust consideration of impacts.</p> <p>Addressed?</p> <p>Yes, in general this approach has been taken within the ES. Specific issues around these topics are included in our response on these documents</p> | | |
| | <p>Issue raised at s42</p> <p>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.</p> <p>Addressed?</p> <p>Yes. Revised tunnel construction methods are presented and such effects are considered in ES where applicable.</p> | | Noted |
| | <p>Issue raised at s42</p> <p>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.</p> <p>Addressed?</p> <p>Yes, this project has been considered in the cumulative impacts section.</p> | | Noted |
| | <p>Issue raised at s42</p> <p>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.</p> <p>Addressed?</p> | | All assessment work undertaken is based upon the assumption that all tunnel arisings would be removed from site and taken to appropriate facilities for recycling or deposition. Any such facilities used for recycling or deposition would be covered by their own licences and permissions for traffic movements. |

| Table 2: Gwynedd Council | | | |
|---|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | No, this is still not adequately covered in the documents received to date. | | |
| As a result of the information provided, are there any new issues which need to be captured in the SOCG or the GC's LIR? | Issue: Avian collision risk Reason/explanation: Concern over approach to collision risk assessment and lack of mitigation. To be discussed with NRW. | | The assessment has considered collision risk for all relevant species. Additional information is discussed below and provided where appropriate within ES Chapter 9, Ecology and Nature Conservation (Document 5.9) and Appendix 9.15 Ornithological Assessment Report (Document 5.9.2.15). SNH guidance recommends designing the route alongside any existing lines, which has been undertaken for the majority of the Proposed Development. |
| | Issue: Ecological mitigation details Reason/explanation: Lack of details provided to adequately assess if proposals are adequate; may be addressed if missing documents can be supplied by NG. | | Additional detail is provided in the Biodiversity Mitigation Strategy (Document 7.7). However the information in the chapter is considered sufficient to be able to conclude residual effects. |
| | Issue: Loss of CWSs and ancient woodland Reason/explanation: Inadequate mitigation provided to date and no details on long-term management and monitoring plans. Enhancement strategy referred to, but this should not be used to deliver essential mitigation that should fall within the DCO boundary. | | Additional detail is provided in the Biodiversity Mitigation Strategy (Document 7.7). Potential biodiversity enhancement are discussed in the Enhancement Strategy (Document 7.13) but not relied on within Chapter 9, Ecology and Nature Conservation (Document 5.9). |
| | Issue: Enhancement measures Reason/explanation: No commitments to ecological enhancement at any location, such as around Pentir substation etc. | | Potential biodiversity enhancement are discussed in the Enhancement Strategy (Document 7.13). |
| Volume 5, Chapter 10: Historic Environment | | | |
| <u>General comment:</u> | The effort made by National Grid to avoid impacts on Vaynol Park and its associated structures through the proposed undergrounding of this section of the scheme is a welcome aspect of the proposed National Grid North Wales Connection Project from an Historic Environment perspective. | | Noted |
| | The impacts of the Ty Fodol Construction Compound and the OHL to the Pentir Substation are the areas of principal concern from a historic environment perspective. The impacts are both above ground i.e. setting impacts (associated | | Noted |

| Table 2: Gwynedd Council | | | |
|-------------------------------------|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | with both construction and operation) and below ground i.e. direct impacts (mostly associated with construction). The wider landscape impacts attributable to the scheme also have a historic environment impact. | | |
| <u>Adequacy of the submissions:</u> | The setting impacts have been well articulated in general and the assessment has been undertaken in accordance with accepted guidance (Document 5.10: Chapter 10, 9.5). The main concern is that the impacts on Fodol Ganol Enclosed Hut Group, CN175 (Document 5.10: Chapter 10, 9.5.306) and Coed Nant Y Garth Standing Stone, CN375 (Document 5.10: Chapter 10, 9.5.313) may have been undervalued. These monuments currently enjoy an agricultural setting and, whilst the Pentir substation is situated nearby, there is no overhead infrastructure visible from these monuments and the distance and screening between them and the existing substation is sufficient to prevent it intruding into the otherwise rural setting. The magnitude of effect on these monuments would appear to have been underestimated. A request has been made (28 th February 2018, Historic Environment Thematic Group Meeting) for further evidence to be provided by way of photomontage to illustrate the impacts on these monuments, particularly the views from Coed Nant Y Garth towards Snowdonia. | | <p>It is agreed that Fodol Ganol Enclosed Hut Group, CN175 and Coed Nant Y Garth Standing Stone, CN375 currently enjoy an agricultural setting. However, overhead infrastructure is currently visible from both of these monuments. There are pylons of two 400kV overhead lines visible from Fodol Ganol Enclosed Hut Group with the nearest being at a minimum distance of approximately 650m. There are also overhead lines for local distribution, including a wood pole line which crosses over the monument.</p> <p>A 400kV overhead is also visible from Coed Nant Y Garth Standing Stone at a distance of approximately 1.5km. A part of the A487 as well as commercial buildings on the southern edge of Parc Menai are also currently visible from Coed Nant Y Garth.</p> <p>Taking account of the current baseline it is considered that the assessment draws a reasonable conclusion on the construction and operation phase effects on these monuments.</p> <p>Visualisations from these monuments are now provided as ES Appendix 10.8 (Document 5.10.2.8).</p> |
| | Whilst the magnitude of effect has been assessed correctly in relation to the built environment assets affected by the proposals, the assessment of all Grade II listed buildings as being of medium value rather than high (Document 5.10: Chapter 10, 4.4.5) needs to be challenged. All 'nationally important' assets should be considered to be of high value. | | The ES chapter has been amended for the final submission, with Grade II listed buildings all identified as being of high value. |
| | The below ground impacts have been considered through a programme of desk based assessment and field survey (Document 5.10.2.1), geophysical survey (Document 5.10.2.2) and subsequent trial trenching (report not yet submitted). The archaeological desk study covers the scope of work required for such a document and utilises the data sources that would be expected of such a document. However, in general, this document comprises a summary of the known | | The archaeological desk study survey (Document 5.10.2.1) largely considered evidence on the known archaeological resource as it was understood prior to the completion of the field surveys. The completion of the field surveys has generated further information to inform an understanding of the potential archaeological resource, |

| Table 2: Gwynedd Council | | | |
|---------------------------------|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | archaeological resource rather than an assessment of the potential (i.e. yet to be discovered) archaeological resource. This is an omission. | | and this is reported in the ES chapter and reflected in the Archaeological Strategy (Document 7.8). |
| | The geophysical (magnetometer) survey results are good and the survey corridor reflects an area which helps to characterise the archaeological resource within the area of impact of the proposals. The results of the geophysical survey have allowed numerous anomalies to be identified. However, there is little discussion of the potential limitations of geophysical survey as a technique; magnetometer survey only ever allowing certain types of feature to be identified. As a consequence, large parts of the proposed development area pose significant risk through important, complex or extensive archaeological remains not having been identified. Given the limited previous archaeological work undertaken in the study area, the staged programme of archaeological work needs to inform the development of a detailed deposit model and a robust, comprehensive archaeological mitigation strategy. | | The ES Chapter (Document 5.10) has been amended to clarify that geophysical survey is generally not suitable for identifying some remains, such as smaller pits and post-holes, whilst reflecting that it has proved successful in that it has identified the sub-surface archaeological remains of the type that a survey of this sort could be expected to. |
| | <p>The wider impacts on the historic landscape have been considered in Environmental Statement Chapter 5.10.2.3 ASIDOHL. Whilst this document meets the required standard for such work, there are some outstanding issues:</p> <p>The direct impacts (Table 4.4) on the Segontium – Canovium Roman Road may have been undervalued. If this feature is to be avoided by the construction compound, then the assessment provided in the report is correct. This requires confirmation.</p> <p>The indirect visual impacts (Table 5.1) on Fodol Ganol Enclosed Hut Group (CN175) and Coed Nant Y Garth Standing Stone (CN375) may have been undervalued. The report considers the magnitude of effect to be moderate, however the views towards Snowdonia form one of the key views out from Coed Nant Y Garth. Photomontage must be provided to illustrate the impacts on views from these monuments.</p> <p>The ASIDOHL does not discuss mitigation or positive benefits, improvements, amelioration in terms of conservation, improved access, and increasing opportunities for study or research in stage 5. This is an acknowledged part of the ASIDOHL process as set out in the ASIDOHL2 guidance.</p> | | <p>The assessed level of direct impacts on the Segontium – Canovium Roman Road was based on the fact that if any disturbance did occur then this would only affect a relatively short section in the context of the whole length of the road as it passes through the historic landscape. It is the intention to locate the construction compound to avoid the line of the Roman road if at all possible.</p> <p>Taking account of the current baseline it is considered that the assessment draws a reasonable conclusion on the construction and operation phase effects on Fodol Ganol Enclosed Hut Group, CN175 and Coed Nant Y Garth Standing Stone, CN375. It is agreed that there is a view toward Snowdonia from Coed Nant Y Garth Standing Stone, but this is largely limited to the northern edge of the Carneddau at a distance of 10-12km and is partially screened and filtered by trees. Views into central Snowdonia to the south and south-east are screened by the rising local topography and the tree line to the south.</p> <p>Visualisations from Fodol Ganol Enclosed Hut Group, CN175 and Coed Nant Y Garth Standing Stone, CN375 are now provided as ES Appendix 10.8 (Document 5.10.2.8).</p> |

| Table 2: Gwynedd Council | | | |
|--|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | The ASIDOHL has been amended to note positive benefits in Stage 5, including the opportunities for study or research. |
| <u>Data Gaps:</u> | Various documents have been prepared but have not yet been submitted to the Council for consideration. These have been discussed at previous Historic Environment Thematic Group Meetings, most recently 28 th February 2018: | | Noted |
| | Deposit model – a deposit model has been drafted but has not been finalised or agreed with Stakeholders. | | The ES chapter and Archaeological Strategy have been updated in light of previous comments. |
| | Detailed mitigation strategy – a draft mitigation strategy was presented at the meeting on 28 th February but has not been finalised or agreed with stakeholders. Some detail has been included in the Archaeological Strategy (Document 7.10, Table 4.1) but this is not cross-referenced with a figure. | | The Archaeological Strategy has been updated in light of previous comments and the finalised version includes figures. |
| | Trial trenching report – the recent programme of trial trenching is referred to throughout the environmental statement chapters. This document is integral to the evidence base and is required to inform both the deposit model and the mitigation strategy. | | Noted |
| | Fodol Ganol / Coed Nant Y Garth photomontage (as discussed above) has not been submitted to stakeholders for comment. | | Visualisations from Fodol Ganol Enclosed Hut Group, CN175 and Coed Nant Y Garth Standing Stone, CN375 are now provided as ES Appendix 10.8 (Document 5.10.2.8). |
| <u>Adequacy of mitigation proposals:</u> | A detailed and comprehensive mitigation strategy has not yet been agreed. A comprehensive programme of strip, map and sample has been proposed as the primary mitigation for below ground archaeological impacts. Mitigation measures relevant to historic environment effects are set out in Table 10.12 and embedded in the Construction Environment Management Plan. The detail of the mitigation is set out in the Archaeological Strategy (Document 7.10). Please find below detailed comment on this document: | | Noted |
| | <i>2.4.2 Where possible, disturbance to archaeological remains will be avoided through such measures as precise routing of tracks away from known archaeological remains. Areas of archaeological interest would be marked on plans and may be fenced or marked on the ground. 2.4.3 Exclusion areas will be defined in the CEMP, both as written instructions and on clearly labelled maps. There are few circumstances along the route where the full extent of any 'known archaeological remains' has been defined. As such, marking their extent may be</i> | | The extent of areas where avoidance of disturbance to archaeological remains will be sought is provided within the CEMP (Document 7.4). |

| Table 2: Gwynedd Council | | | |
|---------------------------------|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | difficult to achieve. The circumstances in which they will, or will not, be marked on the ground needs to be clearly articulated in order to ensure that such techniques will enable appropriate preservation <i>in situ</i> . | | |
| | 2.4.4 <i>In some cases, important but unexpected archaeological may be encountered during soil stripping. Where feasible, it may be possible to ensure that disturbance to such remains is minimised or avoided by the rerouting of the element of site infrastructure in question, and then re-covering the exposed remains using methods that would maintain the level of preservation in the long term.</i> It should be highlighted that these are likely to be exceptional cases. In general, preservation <i>by record</i> would be an appropriate form of mitigation and the above rationale must not be used to avoid investigating or understanding more complex archaeological deposits. It was agreed at the recent (28 th February 2018) Historic Environment Thematic Group Meeting that preservation <i>in situ</i> would be adopted where remains are considered nationally important and meet the scheduling criteria (this would be agreed through consultation with relevant stakeholders, including Cadw). | | National Grid prefer to maintain the option to preserve archaeological remains where disturbance to them can reasonably be avoided and there are suitable and reliable methods available to preserve <i>in situ</i> any remains that can be avoided. As noted Historic Environment Thematic Group Meeting of 28 th February 2018 preservation <i>in situ</i> would be adopted where remains are considered nationally important and that preservation <i>by record</i> will always remain the primary and default response. The assessment process to date has been driven by the need to identify the extent and nature of the archaeological resource with the aim of minimising any negative impact caused by the proposed development. It is considered that this approach is in line with policy, including NPS EN-1 (paragraph 5.8.19). |
| | 2.4.5 It is worth highlighting that some hand cleaning or other intervention by an archaeologist is often required following machine stripping in order to properly identify archaeological cut features. | | The Archaeological Strategy has been updated in light of previous comments and the finalised version includes the requirement of hand cleaning is section 5.2.4. |
| | 2.5.5 The detailed method statement should also be agreed with GAPS as well as the Archaeological Clerk of Works. | | The Archaeological Strategy has been updated in light of this comments and the finalised version includes the requirement for GAPS to approve the method statement. |
| | 2.5.6 <i>Given the scale and anticipated timeframe of the project, it will be necessary to programme an agreed level of funded monitoring for GAPS in order not to impose an onerous level of work upon the organization.</i> | | Noted |
| | Adequate resourcing will be required and a mechanism to ensure compliance with this requirement will need to be agreed e.g. s106 agreement, legal bond or other mechanism. | | The Archaeological Strategy is one of a number of plans submitted as part of the DCO application setting out control and management measures to be implemented as part of the DCO and to be secured by Requirement 6 of the draft DCO (Document 2.1). |

| Table 2: Gwynedd Council | | | |
|--|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| Volume 5, Chapter 11 Geology, Hydrogeology and Ground Conditions | | | |
| Does the information provide sufficient detail/clarity on National Grid's proposal/position? | The Draft Geology, Hydrogeology and Ground Conditions chapter of the Environmental Statement provides a reasonable degree of detail with respect to National Grid's proposals for the scheme. It is expected that further detail for the scheme will be provided in earlier introductory chapters in the Environmental Statement (typically Chapter 3 - Description of the Proposed Development). On this basis, the information contained in the document is considered to provide sufficient detail on National Grid's proposals subject to the provision of further detail in an updated Chapter 3 – Description of the Proposed Development. | | Noted |
| Is the detail submitted adequate (i.e. in order to make an assessment)? | The Draft Geology, Hydrogeology and Ground Conditions chapter of the Environmental Statement provides a detailed overview of the assessment methodology, the basis of the assessment, and the sources of information and baseline condition as indicated in Section 7. | | Noted |
| | The detail is generally adequate to make an assessment of the potential effects attributable to the proposed scheme and to provide general guidance on mitigation measures. Ground investigations have been undertaken for the onshore areas between the Braint and Ty Fodol THH/CSEC to provide more detailed information of geology and groundwater conditions, with some investigation focussing on potential soil and groundwater contamination. National Grid acknowledge that further intrusive investigation will be required at specific points of interest along the cable route in order to provide information to undertake a more robust and thorough assessment. The Council would welcome this information when it becomes available. | | Noted |
| Is there anything missing? What are the gaps? Do you have any view on the impact assessment by National Grid? | It is noted from National Grid's list of Batch 3 caveats (dated 9 th February 2018) that the design and construction information is still evolving in respect of ongoing discussions with land owners and information received. National Grid indicate that some design and construction information may vary before submission, although it is further acknowledged by National Grid that the changes are likely to be small. Any changes to the assessment of significant effects must be fully reported in the final ES submission and ideally discussed with the Council. | | Noted; the ES submitted provides an assessment of the Proposed Development for which the application is submitted. |

| Table 2: Gwynedd Council | | | |
|---------------------------------|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | National Grid indicate that they are still working through comments on the first batch of documents and therefore the current document (which is the subject of this review) has yet to been updated to reflect these comments. | | Noted |
| | It is indicated by National Grid that the ES Chapter has not yet been updated to include all of the baseline data which may have been collected. It would be useful to understand what data has been obtained since the last revision and which has not yet been included. However, it is clear that National Grid has addressed, within the Chapter, many of the issues raised as part of the Stage 3 consultation and which are listed in Table 11.3. | | Noted |
| | Section 4.6 – Assumptions and Limitations to the Methodology (to determine the baseline ground and groundwater conditions, how they could be affected by the proposed development (the impacts) and how significant the effects of these impacts are likely to be) indicates that assumptions have been made with respect to the depth of foundations for pylons and the length of dewatering for the placement of shallow foundations. It is not clear what these assumptions are and where they can be found within the document. This matter should be confirmed in the Environmental Statement. | | Section 4.6 of Chapter 11, Geology, Hydrogeology and Ground Conditions (Document 5.11) has been updated. |
| | It is acknowledged, in the introduction to Section 7, that not every element of the baseline environment is assessed in Section 8 (Potential Effects) and Section 9 (Mitigation and Residual Effects). It would be useful for National Grid to provide a more thorough explanation to the Council in this respect to allow full consideration as to the appropriateness of this approach and to ensure that all relevant information will be included within the Environmental Statement. | | Chapter 11, Geology, Hydrogeology and Ground Conditions (Document 5.11) has been updated to reflect the Proposed Development as applied for and all relevant information has been included. |
| | Table 11.14 lists 45 historic boreholes which have been obtained from British Geological Survey (BGS) archives and which relate to the existing 400kV line and other areas within the Order Limits. For clarity on their position and their relation to elements of the proposed works, it would be useful if they were marked on the geological figures. In addition, clarity should be provided as to the depth to the base of the rock strata listed in Table 11.14. It is likely that the base of the borehole is indicated rather than the base of the rock although this should be confirmed. | | <p>The locations of the boreholes have been included on Figure 11.2, Superficial Geology (Document 5.11.1.2).</p> <p>In Chapter 11, Geology, Hydrogeology and Ground Conditions (Document 5.11) the table detailing the Historic BGS Boreholes has been updated to include a note that each strata is recorded to the bottom of that strata as shown on the logs. However, it has been assumed that the depth to bottom of the strata, for the strata described as rock, is the base of the borehole and therefore the depth of rock is unproven.</p> |

| Table 2: Gwynedd Council | | | |
|--|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | It is noted that data from the land agent for surveyed private water supplies is still outstanding. Some clarification is required as to the impact of this outstanding information on the final outcome of the Private Water Supply Risk Assessment presented in Appendix 11.6. | | Chapter 11, Geology, Hydrogeology and Ground Conditions (Document 5.11) and Appendix 11.6 (Document 5.11.2.6) has been updated to include for the private water supplies identified by the land agents. |
| Are the mitigation proposals adequate and fit for purpose? | Generally, the mitigation measures indicated in the CEMP and OWMP consist of standard good site practice and management. The potential effects and the mitigation due to construction activity are included in table 11.28. However, additional mitigation in relation to the effects of land contamination, coal workings, piled foundations etc. may be required following further intrusive ground investigation and associated risk assessment which is acknowledged by National Grid as a requirement going forward. Where risks are confirmed, a mitigation strategy would need to be implemented through appropriate design and / or remedial works which would need to be agreed with GC. The means of securing this strategy should be confirmed e.g. by Planning Requirement. | | It is acknowledged that additional mitigation following risk assessment on completion of the ground investigation may be required. The framework for determining and implementing this is set out under section 6.3 of the Construction Environmental Management Plan (Document 7.4) . |
| Are there any changes or inconsistencies in the project detail following on from s42 or any Thematic Working Group? | The current draft of the Soils, Geology and Ground Conditions chapter of the Environmental Statement has benefitted from the Section 42 comments and responses. Further project detail has been provided by National Grid and the sources of information have been expanded. This has allowed further and more detailed assessment work to have been undertaken to understand the potential effects of the construction works, and the results of the assessments reported in the Chapter. Tables 11.2 and 11.3 of the chapter outline the issues which have been raised in the Scoping Opinion and Stage 3 Consultation with the response by National Grid and how these issues have been addressed in the Environmental Statement. | | Noted |
| OVERALL CONCLUSION OF FACTUAL ASSESSMENT (Please provide an overall synopsis from completion of Stage 1) | The Draft Soils, Geology and Ground Conditions chapter of the Environmental Statement, along with Chapter 3, provides sufficient detail on National Grid's proposals at this time. Some areas require updating to include additional information which National Grid have already sourced, but for which National Grid acknowledge have not yet been included in the current draft. It would appear that National Grid have taken board many of the comments from the Scoping Opinion and S42 and this is welcomed. National Grid summarise appropriate construction mitigation in the Chapter based on the OWMP and CEMP, although additional mitigation may be required following the results of project specific ground | | Noted |

| Table 2: Gwynedd Council | | | |
|--|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | investigation, particularly related to ground contamination, mining and piled foundations. | | |
| Does the information provided in the updated chapter adequately address the issues raised at Section 42 consultation? | Most of the issues raised at Section 42 consultation have been addressed by National Grid and additional information has been presented in the draft Soils, Geology and Ground Conditions chapter of the Environmental Statement. | | Noted |
| | <p>Outstanding areas include:</p> <p>Presentation and assessment of all information into the document. It is acknowledged by National Grid that not all information accessed and obtained as part of the study has been incorporated into the latest draft. In addition, the scheme details are not yet finalised and therefore details of the assessments and mitigation required are likely to change, although changes are likely to be small.</p> | | <p>Chapter 11, Geology, Hydrogeology and Ground Conditions (Document 5.11) has been updated to reflect the Proposed Development as applied for and all the baseline information collected.</p> <p>Chapter 11, Geology, Hydrogeology and Ground Conditions (Document 5.11) and Appendix 11.6 (Document 5.11.2.6) has been updated to include for all the current information obtained for private water supplies. Part of this information was obtained from the IACC Environmental Health Team. No comments have been raised on the assessment methodology presented in either the PEIR or draft Chapter 11, Geology, Hydrogeology and Ground Conditions (Document 5.11).</p> |
| | Information related to private water supplies is not yet complete. In addition, from the information presented, it is unclear if National Grid have engaged with the IACC Environmental Health Team regarding the approach to the study, the assessment methodology and the resource implications. | | Chapter 11, Geology, Hydrogeology and Ground Conditions (Document 5.11) and Appendix 11.6 (Document 5.11.2.6) has been updated to include for the private water supplies identified by the land agents. |
| Volume 5, Chapter 12: Water Quality, Resources and Flood Risk | | | |
| Does the information provide sufficient detail/clarity on National Grid's proposal/position? | In respect of Chapter 12, it is considered that the information provides sufficient clarity on National Grid's proposal. | | Noted |

| Table 2: Gwynedd Council | | | |
|--|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | However, the lead local flood authority for Gwynedd is unable to agree to the inclusion of the ordinary watercourse consenting within the DCO. The reason for this is that the grid had not consulted with the Lead Local Flood Authority on any matters beyond the initial drainage design methodology. | | National Grid is not proposing to include ordinary watercourse consenting (OWC) powers in the DCO. Lead Local Flood Authorities (LLFAs) will retain their consenting powers with regards to works relating to the scheme that are likely to affect ordinary watercourses. The approach taken in the hydrology chapter of the ES and the FCA is that the site-specific application of the generic mitigation principles set out therein will be subject to further LLFA scrutiny via the OWC process following grant of the DCO. |
| Is the detail submitted adequate (i.e. in order to make an assessment)? | Further detail is requested in Chapter 12 and associated appendices, as set out below. | | See responses below |
| <u>Appendix 12.2 – Pentir Substation Extension Flood Consequences Assessment</u> | Sections 4.3.7 to 4.3.7 should acknowledge the potential for downstream third-parties to be affected as a result of uncontrolled discharge of site drainage to the Nant y Gareth / Afon Heulyn and their tributaries. Both watercourses have known historic flooding issues, with property flooding associated with both. | | All discharges from the site during both construction and operations phases would be limited to greenfield runoff rates through the provision of appropriate site drainage incorporating runoff attenuation, as set out in para. 4.3.9 of Volume 2 of the FCA (Document 5.12.2.2). |
| | Table 5.1 and section 6.2.1 – the Council is in agreement that an appropriate drainage strategy is required for the extension works, and would suggest that an ‘outline’ drainage design should be produced <i>prior</i> to DCO submission in order to give comfort that an adequate solution, compatible with SuDS principles, can be implemented. Note that, in future, impermeable areas greater than 100m ² are likely to require the consent of the SuDS Approval Board (SAB). | | The principles which the drainage design for Pentir substation should adhere to are set out in the CEMP (Document 7.4, measures WE51-59, and WE510-511), which is secured through Requirement 6. Furthermore, the preparation of a Drainage Management Plan is secured via Requirement 7. The DMP would include full details of the proposed drainage design for Pentir substation, and would be subject to the approval of Gwynedd Council in their capacity as LLFA prior to commencement of works. |
| | The Council is also in agreement that a detailed design is required for all watercourse crossings. Note that any watercourse crossings – whether temporary or permanent – will require Ordinary Watercourse Consent from Gwynedd Council. Submissions will need to demonstrate no increase in flood risk and will need to detail temporary works. | | Noted. |
| | Section 6.2.2 – Granular fill: the drainage design will need to consider possible compaction of fill and the generation of “fines” which may impede drainage and increase runoff rates. | | Specific reference to granular fill has been removed, as it is not explicitly incorporated in the development description provided in Document 5.3 . |

| Table 2: Gwynedd Council | | | |
|---|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| <u>Appendix 12.3 – Cable Sealing End Compounds and Tunnel Head Houses Flood Consequences Assessment</u> | <p>Comments as above for Appendix 12.2.</p> <p>Section 1.3.5 – the Council notes the low discharge rates from tunnel dewatering (0.1 l/s during construction; 0.04 l/s during operation). It is also noted that, after passing through a treatment works, these discharges will be routed to the site's drainage. Given the low discharge rates, the Council is satisfied that these discharges alone would not pose any measurable increase in flood risk to the Nant y Garth or its tributaries.</p> | | The final assessment considers the option of drill and blast being used for tunnel construction, which would result in higher rates of dewatering compared to TBM (as set out in Chapter 4 of the ES, Document 5.4). Discharge of dewatering arisings to the Nant y Garth would be by permit, and the CEMP (Document 7.4) includes a requirement for dewatering discharges to cease during periods in which flood alerts/warnings are in place, mitigating potential increases to flood risk downstream. |
| Is there anything missing? What are the gaps? Do you have any view on the impact assessment by National Grid? | N/A | | Noted |
| Are the mitigation proposals adequate and fit for purpose? | N/A | | Noted |
| Are there any changes or inconsistencies in the project detail following on from s42 or any Thematic Working Group? | It is considered that the comments raised by the Council at s42 consultation have been thoroughly addressed. | | Noted |
| OVERALL CONCLUSION OF FACTUAL ASSESSMENT (Please provide an overall synopsis from completion of Stage 1) | <p>The comments raised by the Council at s42 consultation have been addressed, however the Council requests acknowledgement of the potential for downstream third parties to be affected by flooding due to the proposed works at Pentir Substation, the CSECs and THHs.</p> <p>The Council requests that detailed drainage designs for all watercourse crossings is produced, and that a drainage strategy is shared with the Council prior to DCO submission. At this stage, the Council is unable to agree on the inclusion of</p> | | <p>The potential for flood risk to third parties as a result of uncontrolled runoff from the Pentir and Ty Fodol sites is acknowledged in Vols. 2 and 3 of the FCA (Document 5.12.2.2, para. 4.3.8 for Pentir; Document 5.12.2.3, paras. 4.2.1 and 4.2.2 for Ty Fodol).</p> <p>An outline drainage strategy has been produced for the Ty Fodol THH/CSEC (Annex 5.12.2.3B). Detailed drainage designs will be produced for both the Pentir substation extension and the Ty Fodol THH/CSEC as part the Drainage Management Plan, which is secured via Requirement 7 of the draft DCO (Document 2.1). Those sections of the DMP relating to Pentir and Ty Fodol would</p> |

| Table 2: Gwynedd Council | | | |
|---|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | Ordinary Watercourse Consenting in the DCO due to a lack of consultation on any matters beyond initial drainage design methodology. | | be subject to the approval of Gwynedd Council in their capacity as LLFA prior to commencement of works. Drainage designs would adhere to the principles set out in the CEMP (Document 7.4, measures WE51-59, and WE510-511), which is secured through Requirement 6 of the draft DCO (Document 2.1). Detailed designs for watercourse crossings would be submitted in support of applications for relevant Ordinary Watercourse Consents or Flood Risk Activities Permits. These designs would be in accordance with the relevant design principles set out in the CEMP (Document 7.4, FM14). |
| Volume 5, Chapter 13: Traffic and Transport | | | |
| Does the information provide sufficient detail/clarity on National Grid's proposal/position? | The Draft Traffic and Transport chapter provides a detailed overview on the approach undertaken to assess the impacts of the proposed National Grid development. It includes additional information not included as part of the Section 42 consultation, such as assessments relating to specific effects such as severance, driver delay, pedestrian delay, pedestrian amenity etc. On that basis, the information contained in the document is considered to provide sufficient detail on National Grid's proposals at this time | | Noted |
| Is the detail submitted adequate (i.e. in order to make an assessment)? | The draft Traffic and Transport chapter provides a detailed overview of the methodology and the sources of information used to undertake the assessments. The scope of the study and assessment criteria used enable the Council to understand and provide a formal response to the impacts of the Proposed Development (in Traffic and Transport terms). Further detail will be required to inform the cumulative impacts (Section 10), and these are discussed later in this response. It is also requested that prior to the submission of the ES and DCO, mitigation proposed as part of the supporting Public Right of Way Management Plan (PRoWMP) document is shared with the Council to ensure meaningful engagement. | | The PRoW Management Plan (Document 7.6) has been shared with the council and comments received. |
| Is there anything missing? What are the gaps? Do you have any | A summary of missing information is provided below. Where National Grid has acknowledged further work is required, these have also been provided for completeness: | | Noted |

| Table 2: Gwynedd Council | | | |
|--|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| view on the impact assessment by National | | | |
| | Table 13.1 provides a summary of the associated supporting documents to the draft Traffic and Transport chapter. The draft Transport Assessment has been provided as part of Batch 2, and this is welcomed. The PRowMP has yet to be provided. It is requested that this document is provided in advance of DCO submission. | | The PRow Management Plan (Document 7.6) has been shared with the council and comments received. |
| | Gwynedd Council has acknowledged that CrashMap data is acceptable to assess highway links within their ownership. However, it is noted that Link 19 has experienced two fatalities. With this in mind, Gwynedd Council recommend that Personal Injury Accident (PIA) data is reviewed to allow a robust assessment to be undertaken of this highway link, to ensure any existing highways issues are identified and not exacerbated by the Proposed Development. | | At the scoping stage it was stated that National Grid would use Crashmap if unable to get hold of PIA data. National Grid has requested this data from IACC but this has not yet been provided. In March 2018 North Wales Police stated that they would be able to provide this PIA data. This data has not been provided to National Grid and as a result it has not been possible to incorporate into the submission. |
| | Section 4 and Table 13.56 provide an overview of the consideration of Wylfa Newydd Nuclear Power Station. National Grid has acknowledged the information relating to Wylfa Newydd Nuclear Power Station is based on an October 2017 submission date, and a construction start of 2019. It is expected that this PAC3 information will be included in the draft Transport Assessment and will be updated as part of the DCO submission. It is also expected that this will form part of the cumulative effects assessments provided in Section 10. National Grid will be required to demonstrate that they have obtained the latest evidence from Horizon Nuclear Power which is available to them for consideration as part of their DCO submission. | | Noted, this consideration of the Horizon Nuclear Power submission is included within Section 10 of the Traffic and Transport ES Chapter. |
| | Section 7, table 13.16, provides baseline condition data. HGV traffic data for Links ref 22 to 35 are not provided. | | This has been updated in the submission version of the chapter. |
| | Table 13.17 allocates Sensitivity of Highway Links for Assessment. Gwynedd Council disagrees with the assumed link sensitivity of Link 19. As per Table 13.9 the criteria for assessing cycling routes are affected by the cycling routes being on-road (medium sensitivity) or off-road (low sensitivity). The cycle route at this location is only provided off-road for a small section, and on one-side of the road. The sensitivity of this link should therefore be classified as a medium sensitivity. | | We do not agree that Link 19 is a receptor with Medium sensitivity to changes in traffic flows, given that the cycle route is designated as an off road route on the Sustrans Network Map between the A487 roundabout and junction immediately north of Nant-y-Garth priority junction. |

| Table 2: Gwynedd Council | | | |
|---|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | This will allow Gwynedd Council to understand if mitigation measures are required to ensure the impacts on cyclists are minimised. | | |
| | It is noted that the impacts of Link 30, Fodolydd Lane between B4547 and Access F3, shows a high effect of severance. National Grid has stated that “a proportion of traffic associated with construction work at the Tŷ Fodol site would be likely to utilise the existing access from the B4547, particularly as junction improvements are proposed at this location”. Gwynedd Council seek reassurances that this will be the case. | | Noted. There is the opportunity for LGV traffic to use Fodolydd Lane West and the existing Pentir access and proposed access track to the Ty Fodol Tunnel Head House. The ES chapter concludes that the residual effect of severance would be Minor (Not Significant) if LGV traffic used the existing Pentir access or if Tunnel scenario 1 was adopted. |
| | Section 7.5 provides a summary of the PRoW sensitivity at each link. For completeness, and as a general rule for the document as a whole, it would be helpful if the document was updated to provide a brief overview as to how the sensitivity classification, magnitude of impacts and residual effects (in Section 9) have been identified. Whilst it is acknowledged that the criteria is provided earlier in the document, it would be useful to understand how some of the outputs are identified. This could be done through additional commentary supporting this section of the document. | | Noted and included in the ES chapter. |
| | It is noted that there are a number of mitigation measures which are provided in the PRoWMP which has yet be provided. As such, no formal comments have been provided on the adequacy of the proposals. | | The PRoW Management Plan (Document 7.6) was not included in the batches of documents issued as it was issued to the councils in August 2017. No comments were received. |
| | Intra and Inter project cumulative impact assessments are require review to include additional information, i.e. Wylfa Newydd traffic volumes. | | Intra and inter-project cumulative assessments include the latest publically available information for the Wylfa Newydd Power Station. |
| Are the mitigation proposals adequate and fit for purpose? | <p>A review has been undertaken of Section 9 – Mitigation and Residual Effects at this stage:</p> <p>Table 13.23 provides an overview of the general CEMP mitigation measures. Code GP11 makes reference to the construction working hours. It is requested that all documents make reference to mitigation measures proposed in the Transport Assessment, for consistency i.e. limiting construction movements through certain junctions, outside of the highway and/or school peak hours.</p> | | The Transport Assessment (Document 5.13.2.1) and the OCTMP (Document 7.5) both note that in order to mitigate some localised effects it may be necessary to restrict certain movements in certain locations at certain times of the day or year. |

| Table 2: Gwynedd Council | | | |
|--|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>It is noted that there are a number of mitigation measures included in the PProWMP. This is yet to be provided, and as such, no comments can be provided on the adequacy of this information. It is requested that this document is provided in advance of DCO submission.</p> <p>In relation to the contingency routes identified within the assessment, thresholds would need to be agreed with the Council on the level of usage/ additional traffic volumes on each route.</p> | | The PProW Management Plan (Document 7.6) was not included in the batches of documents issued as it was issued to the councils in August 2017. No comments were received. |
| Are there any changes or inconsistencies in the project detail following on from s42 or any Thematic Working Group? | The draft Traffic and Transport chapter provides a detailed summary of the assessment work to allow the Council to understand the potential effects arising from the traffic associated with construction, operation, maintenance and decommissioning of the Proposed Development. Section 3.2 (and Table 13.3) of the document outlines the issues that were raised in the Scoping Opinion and how these have been addressed in the ES. Where appropriate these changes have been incorporated into the draft chapter, which is welcomed. | | Noted |
| The table below addresses each of the issues raised at S42 Consultation. | <p>Issue / further clarification needed</p> <p>Engagement required to develop parameters for the TA (which should make clear reference to where the scope of assessment has been agreed and note with justification any departure from current guidance)</p> <p>Has this been addressed? (Y/N + further detail if relevant)</p> <p>Y – NG have submitted two scoping notes. The outstanding information relates mostly to the detail but the broad parameters for the Assessment are likely to have been agreed with Gwynedd Council</p> | | Noted |
| | <p>Issue / further clarification needed</p> <p>ZOI remains under review until the rationale behind the study area is agreed with the Council</p> <p>Has this been addressed? (Y/N + further detail if relevant)</p> <p>Y – I understand that the ZOI has been agreed with the Councils</p> | | Noted |

| Table 2: Gwynedd Council | | | |
|---------------------------------|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>Issue / further clarification needed</p> <p>The Council seeks clarity on the dataset used for the TEMPRO model and recommends using National Traffic Model Traffic Growth Calculation to derive traffic growth forecasts</p> <p>Has this been addressed? (Y/N + further detail if relevant)</p> <p>N – Whilst NG have used the appropriate TEMPro datasets, there are issues regarding what information has been derived. Further work required by NG to address these issues.</p> | | <p>Noted and included National Traffic Model Growth adjustments to the growth factors in the ES chapter.</p> <p>Furthermore, the 2023 junction assessments within the TA have used AM and PM growth factors also adjusted in accordance with the National Traffic Model.</p> |
| | <p>Issue / further clarification needed</p> <p>Working days - rationale required to justify proposed construction working hours</p> <p>Has this been addressed? (Y/N + further detail if relevant)</p> <p>Y- The CTMP provides a summary of the working construction working hours. Gwynedd Council to confirm whether this is acceptable.</p> | | Noted |
| | <p>Issue / further clarification needed</p> <p>Further information on how the traffic flows for HGVs have been disaggregated</p> <p>Has this been addressed? (Y/N + further detail if relevant)</p> <p>Y – This has been provided by NG. Further information required for the Council to understand the principles of how the traffic flows have been derived.</p> | | Noted |
| | <p>Issue / further clarification needed</p> <p>Further consultation to refine construction routeing (modifications were suggested on site visit)</p> <p>Has this been addressed? (Y/N + further detail if relevant)</p> <p>Y – NG have made changes to the construction routeing. Gwynedd Council to confirm whether this is acceptable.</p> | | Noted |

| Table 2: Gwynedd Council | | | |
|---|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>Issue / further clarification needed</p> <p>Further information to inform the assessment of how the decommissioning phase will be taken for example whether highways / off highways areas will be returned to their previous state</p> <p>Has this been addressed? (Y/N + further detail if relevant)</p> <p>N – NG have made a commitment to returning the temporary access to its original state. No detail has been provided on a site-by-site basis.</p> | | Upon decommissioning all areas would be returned to their original state. |
| | <p>Issue / further clarification needed</p> <p>No detail presented as to the volume of spoil arising and associate volume of traffic movements.</p> <p>Has this been addressed? (Y/N + further detail if relevant)</p> <p>Y – NG have provided information on the spoil to be removed in the Outline Waste Management Plan and it is understood that this has been included in the traffic generation for the Proposed Development. Further information is required from NG to understand how the traffic flows have been derived.</p> | | Noted |
| OVERALL CONCLUSION OF FACTUAL ASSESSMENT (Please provide an overall synopsis from completion of Stage 1) | Overall, it is considered that the draft Traffic and Transport chapter provides sufficient detail on National Grid's proposals. It is noted in the earlier sections that clarifications on mitigation are required in the form of the PROWMP to allow the Council to understand the implications of the proposals on the Public Rights of Way network. The assumed Sensitivity of Highway Links for Assessment will require reviewing and amending by National Grid. | | See above |
| Document 5.13.2.1 Transport Assessment | | | |
| Does the information provide sufficient detail/clarity on National Grid's proposal/position? | The Draft Transport Assessment provides a detailed overview of the approach undertaken to assess the impacts of the proposed development. It includes additional information not included as part of the S.42 consultation, such as assessments related to highway safety, junction assessments and mitigation proposals that allow a more detailed understanding of the proposal. On that basis, | | Noted |

| Table 2: Gwynedd Council | | | |
|--|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | the information contained in the document provides sufficient detail on National Grid's proposals at this time. | | |
| | The comments provided in this response highlight areas for further clarification and additional information to support the Transport Assessment that will be submitted as part of the DCO. | | Noted |
| Is the detail submitted adequate (i.e. in order to make an assessment)? | <p>There are a number of areas where further information is required, in order to ensure a robust assessment of the transportation impacts is adequately assessed. A summary of the key points is provided below:</p> <p>Gwynedd Council has acknowledged that CrashMap data is acceptable to assess highway links within their ownership. However, it is noted that the B4547 has experienced two fatalities. With this in mind, Gwynedd Council recommend that Personal Injury Accident (PIA) data is reviewed to allow a robust assessment is undertaken of this link to ensure any existing highways issues are identified and not exacerbated by the Proposed Development.</p> | | <p>At the scoping stage it was stated that National Grid would use Crashmap if unable to get hold of PIA data. National Grid has requested this data from IACC but this has not yet been provided.</p> <p>In March 2018 North Wales Police stated that they would be able to provide this PIA data. This data has not been provided to National Grid and as a result it has not been possible to incorporate into the submission.</p> |
| | Table 4.5 demonstrates that a number of classified turning counts have been used in order to inform the capacity assessments. It states that a total of 28no MCTC surveys and 5no queue length surveys at junctions on Anglesey and Gwynedd were counted. It's not clear why queue surveys weren't carried out across all junctions included in the junction assessments. Queue surveys are required at all junctions to ensure the base models accurately reflect the existing conditions at each junction included in the assessment. | | Queue length surveys for junctions in the study area have been included within the Transport Assessment. |
| | It is noted in Table 4.6 that TEMPro 7.2 has been used to identify growth rates for the future 2023 baseline year. The use of this data set is welcomed. It's clear from the information presented in this section that average growth rates have been applied to the base traffic counts. In order to ensure a robust assessment is undertaken, AM and PM peak hours TEMPro rates should be derived separately, and used to growth the baseline turning count data to 2023 and used in the peak hour junction assessment contained in Section 9. | | The 2023 junction assessments within the TA have used AM and PM growth factors adjusted in accordance with the National Traffic Model. |

| Table 2: Gwynedd Council | | | |
|--|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | Section 8.2 provides an overview of the traffic likely to be generated during the construction peak. This information is welcomed and allows Gwynedd Council to understand the level of traffic likely to be generated by the Proposed Development. Further information on the assumptions and methodology used to derive the peak traffic movements for all vehicles is requested to allow Gwynedd Council to understand this process. | | Methodology used to derive HGV and LGV has been clarified in subsequent discussions with IACC and has been revised in the TA (Document 5.13.2.1) submission. |
| | Para 8.2.4 provides a summary of the staff/worker numbers. Reference is made to the peak numbers of workers across the Proposed Development which is anticipated to be 508 full time equivalents (FTE). It is not clear how this has been calculated and during at what point of the construction programme. A tabulated build-up of workers throughout the construction programme would be welcomed. | | This information is provided in Appendix 17.2 Workforce Analysis Assumptions Log (Document 5.17.2.2). |
| | Para 8.2.5 states that traffic generation profiles presented in the subsequent sub sections account for the movement of staff to each primary temporary access points via LGVs/HGVs. It is not clear how these trips have been assigned to the network. | | Noted. The revised TA (Document 5.13.2.1) for submission provides further detail on this. |
| | Section 12.9 refers to limited parking provision at construction areas. Gwynedd Council requests that information be provided on measures to ensure parking in areas surrounding the Ty Fodol Construction Compound can be prohibited. It is noted that there have been two fatalities on the B4547, and the Council seek reassurances that increases in traffic associated with construction workforce travel is limited. | | Noted. The revised TA (Document 5.13.2.1) for submission provides further detail on this. |
| Is there anything missing? What are the gaps? Do you have any view on the impact assessment by National Grid? | A summary of missing information is provided below. Where National Grid has acknowledged further work is required, these have also been provided for completeness: | | See responses below. |
| | Section 5.4 relates to the Construction Traffic Route Hazard Risk Register (CHRHRR) and has information contained in the Construction Traffic Management Plan (CTMP). This information was not included as part of the CTMP submitted in November 2017, and as such, no comments can be provided on the adequacy of this information. It is expected that this will be provided prior to National Grid's DCO submission to ensure adequacy of engagement with the Council. | | The Outline CTMP (Document 7.5) has been circulated to IACC for comment and has been updated and revised within the submission. This includes, as an Annex, a Construction Traffic Hazard Risk Register. |

| Table 2: Gwynedd Council | | | |
|---|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | Section 6.2 relates to Construction Route Groups, however further information is required on the anticipated number of HGV vehicles that will utilise LGV routes for Site Investigation purposes. | | The low levels of activity associated with Site Investigations has been explained at thematic working group meetings |
| | Section 8.9 provides an overview of the committed developments included in the assessments. National Grid has acknowledged the information relating to Wylfa Newydd Nuclear Power Station is based on an October 2017 submission date, and a construction start of 2019. It is expected that this PAC3 information included in the draft Transport Assessment will be updated as part of the DCO application. | | The submission documents consider the DCO submission for Wylfa Newydd. |
| | A review of Figure 13.4 Traffic Count Locations has indicated that not all data has been provided in Annex C (e.g. ATC 15). All survey outputs are expected to be provided as part of the DCO application. | | Traffic count data is summarised within the submission and this data can be made available to the Council upon request, as per the junction modelling referred to above. Due to the volume of raw data it is considered impractical to include all raw data, which is not fundamental to the understanding of the assessment. |
| | There has been no assessment undertaken of Britannia Bridge to understand the impacts of the Proposed Development at this location. It is anticipated that there are likely to be impacts relating to journey times and congestion at this location, and it is essential that the Transport Assessment fully illustrates what these impacts are likely to be. Significant impacts arising from the Proposed Development and other developments in the area are required to be included as part of the assessments undertaken to understand the cumulative impacts. | | This has been further considered in the Transport Assessment (Document 5.13.2.1). |
| | The AIL Report (document 7.7.2.1) has yet to be provided. It is expected that this will be provided in order to enable Gwynedd Council to undertake a review of the information in this document. | | An AIL report has been submitted as Annex B to the Outline CTMP (Document 7.5). |
| Are the mitigation proposals adequate and fit for purpose? | <p>It is understood that mitigation will come in the form of a number of measures. On that basis, a review has been undertaken of the following sections:</p> <p>Section 10 – Mitigation</p> <p>Section 12 – Framework Travel Plan</p> <p>Annex L – Physical Mitigation Measures</p> | | Noted |

| Table 2: Gwynedd Council | | | |
|---------------------------------|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>Section 10 Mitigation</p> <p>This section of the Draft Transport Assessment provides an overview of the proposed mitigation measures.</p> | | Noted |
| | <p>Measure to reduce the impacts of construction traffic movements have been proposed as part of the Proposed Development to address issues regarding highway safety. These include restricting traffic movements to a contingency route and other measures proposed in the Construction Route Hazard Risk Register (CRHRR). It is considered that measures will be identified and implemented on a site-specific basis, and as such, until the precise measures cannot be fully commented upon at this stage in the absence of the CRHRR.</p> | | Noted |
| | <p>Temporary Traffic Regulation Orders (TTROs) are proposed as part of the mitigation proposals. It is recommended that these are agreed with the Council at the earliest opportunity. National Grid should consider producing a 'TTRO principle note' which should be reviewed and approved by the Gwynedd Council.</p> | | This has been discussed with IACC and will be issued after the DCO submission. |
| | <p>Further detail is requested on the precise areas that temporary/stopping up measures would be required. National Grid should ensure the correct terminology is used when referring to temporary traffic prohibition orders, etc.</p> | | Noted |
| | <p>Further information is requested on restricting vehicles during school pick-up/drop-off periods, in particular how it will be implemented, monitored and managed to ensure staff are compliant with this measure.</p> | | Noted. As there are no schools with direct frontage or in the immediate vicinity of the construction routes in Gwynedd, the restriction of movements during school pick up and drop off periods would not be required. |
| | <p>Table 10.1 provides a list of junctions proposed to have HGV restrictions during peak periods. National Grid should confirm how this will be implemented. As requested above, proposals to restrict movements during pick-up/drop-off times, is likely to result in a concentration of trips within both the highway and school peak periods.</p> | | Discussion with Gwynedd Council on this matter is ongoing and the OCTMP (Document 7.5) includes further details on this. |
| | <p><u>Section 12 Framework Travel Plan</u></p> <ul style="list-style-type: none"> This section of the draft Transport Assessment provides information relating to National Grid's commitment to sustainable travel. It is noted that, due to National Grid's operational requirements, and their health and safety obligations, staff (National Grid and their contractors) would not be permitted to enter construction areas. It is recommended that National Grid explore options | | Noted |

| Table 2: Gwynedd Council | | | |
|---|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | for centralised (non-construction) areas for workers to transfer workers to site. This would allow for workers to cycle to these areas. | | |
| | <ul style="list-style-type: none"> The report also indicates that active travel is not permitted during the construction phase of development. With respect to the point made above, National Grid should confirm the policy on active travel, as there is a difference to prohibiting active travel to construction sites and during the construction phase as a whole. | | Given the nature of the Proposed Development and National Grid's inherent health and safety obligations, active travel to site Working Areas would not be permitted during the construction phase of the Proposed Development. |
| | <ul style="list-style-type: none"> The report provides a breakdown of peak workforce numbers for each construction element. It's not clear as to what the peak, cumulative workforce numbers are likely to be across all construction elements. | | The Transport Assessment (Document 5.13.2.1) provides greater clarity on this. |
| | <ul style="list-style-type: none"> The report states that parking would be provided at specified locations (such as construction compounds). It is not clear if these trips have been accounted for in the junction assessments. | | The Transport Assessment (Document 5.13.2.1) provides greater clarity on this. |
| | <ul style="list-style-type: none"> Section 12.9 provides the overarching principles for staff travel to site. It is requested that further detail is provided to agree some of the detail in this section. For example, the location of designated pick-up/drop-off areas at accessible locations. The impacts of these locations will need to be minimised. | | Noted. The Transport Assessment (Document 5.13.2.1) provides greater clarity on this. |
| | <ul style="list-style-type: none"> Section 12.10 provides the measures and initiatives identified for the project. It references Public Transport and Car Sharing as specific measures. It is not clear if there are any specific measures that will be implemented to provide travel sustainable travel. | | The Transport Assessment (Document 5.13.2.1) provides greater clarity on this, and the amount of on-site parking which is considered to be sufficient to avoid impacting on nearby residential settlements. |
| <u>Annex L – Physical Mitigation Measures</u> | Location 10 Fodolydd Lane (west) – proposals to implement widening of the carriageway and associated embankment / retaining works to allow for the movement of larger vehicles at this location is welcomed. It is not clear from the image provided whether bi-directional movements will be prevalent at this location. National Grid are required to confirm that the mitigation proposals are sufficient to allow for all motorised and non-motorised movements can be accommodated. | | <p>Noted. Fodolydd lane west is designated as an enabling works route, during construction as an LGV only route and an operation and maintenance route.</p> <p>The physical mitigation measure proposed is included for the operation and maintenance phase and a scenario that may require one-off movements by larger vehicles which cannot negotiate the existing alignment.</p> <p>These movements would occur with appropriate traffic management measures.</p> |

| Table 2: Gwynedd Council | | | |
|--|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | It is envisaged that the route would operate as it does currently, where two-way movements are facilitated by the use of the existing passing places located along the link. |
| Are there any changes or inconsistencies in the project detail following on from s42 or any Thematic Working Group? | <p>Gwynedd Council provided a detailed response to Chapter 12 of the PEIR (Traffic and Transport) S.42 consultation for National Grid's North Wales Connections Project. In order to understand what changes have been made following the response to this document, a summary has been provided below:</p> <p>At the stage of writing the response to the S.42 document, the Zone of Influence, was under review. This has since been agreed between Gwynedd Council and National Grid.</p> | | Noted |
| | National Grid have provided further information on the traffic flows that are forecast to be generated by the proposals by each element of the construction stage. As noted above, further clarification is required for Gwynedd Council to understand the methodology used to derive the peak traffic movements for all vehicles. | | See above |
| | National Grid has provided information relating to the traffic forecast to be generated by the removal of spoil from site. This information is welcomed and allows Gwynedd Council to understand the impacts that will be generated by this element of construction activity. | | Noted |
| The table below addresses each of the issues raised at S42 Consultation. | <p>Issue / further clarification needed</p> <p>Engagement required to develop parameters for the TA (which should make clear reference to where the scope of assessment has been agreed and note with justification any departure from current guidance)</p> <p>Has this been addressed? (Y/N + further detail if relevant)</p> <p>Y – NG have submitted two scoping notes. The outstanding information relates mostly to the detail but the broad parameters for the Assessment are likely to have been agreed with Gwynedd Council</p> | | Noted |
| | <p>Issue / further clarification needed</p> <p>ZOI remains under review until the rationale behind the study area is agreed with the Council</p> | | Noted |

| Table 2: Gwynedd Council | | | |
|---------------------------------|---|----------------|------------------------------------|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>Has this been addressed? (Y/N + further detail if relevant)</p> <p>Y- I understand that the ZOI has been agreed with the councils</p> | | |
| | <p>Issue / further clarification needed</p> <p>The Council seeks clarity on the dataset used for the TEMPRO model and recommends using National Traffic Model Traffic Growth Calculation to derive traffic growth forecasts</p> <p>Has this been addressed? (Y/N + further detail if relevant)</p> <p>N – Whilst NG have used the appropriate TEMPro datasets, there are issues regarding what information has been derived. Further work required by NG to address these issues.</p> | | See above |
| | <p>Issue / further clarification needed</p> <p>Working days - rationale required to justify proposed construction working hours</p> <p>Has this been addressed? (Y/N + further detail if relevant)</p> <p>Y – The CTMP provides a summary of the working construction working hours. Gwynedd Council to confirm whether this is acceptable.</p> | | Noted |
| | <p>Issue / further clarification needed</p> <p>Further information on how the traffic flows for HGVs have been disaggregated</p> <p>Has this been addressed? (Y/N + further detail if relevant)</p> <p>Y – This has been provided by NG. Further information required for the Council to understand the principles of how the traffic flows have been derived.</p> | | Noted |
| | <p>Issue / further clarification needed</p> <p>Further consultation to refine construction routeing (modifications were suggested on site visit)</p> <p>Has this been addressed? (Y/N + further detail if relevant)</p> | | Noted |

| Table 2: Gwynedd Council | | | |
|---|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | Y – NG have made changes to the construction routeing. Gwynedd Council to confirm whether this is acceptable. | | |
| | <p>Issue / further clarification needed</p> <p>Further information to inform the assessment of how the decommissioning phase will be taken for example whether highways / off highways areas will be returned to their previous state</p> <p>Has this been addressed? (Y/N + further detail if relevant)</p> <p>N – NG have made a commitment to returning the temporary access to its original state. No detail has been provided on a site-by-site basis.</p> | | See above |
| | <p>Issue / further clarification needed</p> <p>No detail presented as to the volume of spoil arising and associate volume of traffic movements.</p> <p>Has this been addressed? (Y/N + further detail if relevant)</p> <p>Y – NG have provided information on the spoil to be removed in the Outline Waste Management Plan and it is understood that this has been included in the traffic generation for the Proposed Development. Further information is required from NG to understand how the traffic flows have been derived.</p> | | Noted |
| OVERALL CONCLUSION OF FACTUAL ASSESSMENT | <p>Overall, it is considered that the draft Transport Assessment provides sufficient detail on National Grid's proposals. Further work and clarifications are required to allow the Council to provide a holistic view on the transport proposals and subsequent mitigation proposals. A list of the key areas are provided below:</p> <p>Queue surveys at all junctions included in the highway assessments</p> <p>Methodology used to derive HGV and LGV traffic</p> <p>Confirmation that there will be a dedicated council Traffic Safety and Control officer</p> | | <p>Queue length surveys for junctions in the study area have been included within the Transport Assessment.</p> <p>Methodology used to derive HGV and LGV has been clarified in subsequent discussions with IACC and has been revised in the TA (Document 5.13.2.1) submission.</p> <p>Discussions with the council on the need for a Transport Management Supervisor are ongoing and the OCTMP includes for a Traffic Control and Safety Officer and a Transport Review Group.</p> |

| Table 2: Gwynedd Council | | | |
|---|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>The Council has yet to see the following information (which have not been listed or shared in the Batch 1 – 4 documents):</p> <p>Abnormal Indivisible Load Report</p> <p>Public Right of Way Management Plan</p> <p>Construction Traffic Route Hazard Risk Register</p> | | See above |
| | The updates to the Transport Assessment following the Council's earlier comments is welcomed. | | Noted |
| Are there any new issues as a result of the information provided? | <p>Issue: Britannia Bridge</p> <p>Reason/Explanation: There is no reference to the operation of the bridge during construction, and the impacts of traffic forecast to be generated by the Proposed Development. An increase in traffic at this location is likely to have impacts, and these are required to be acknowledged in the supporting transport document with appropriate mitigation, should there be significant impacts.</p> | | Further consideration of the effects of the Proposed Development on the Britannia Bridge are considered in ES Chapter 13 and the Transport Assessment. |
| | <p>Issue: PRow Mitigation</p> <p>Reason/Explanation: The PRowMP is yet to be provided, and as such, the mitigation proposed as part of the Proposed Development is not yet known. It is likely that there will be impacts on users of the Wales Coast Path. Mitigation proposals should be provided in advance of the DCO submission.</p> | | Effects on PRowS are documented in ES Chapter 13, and management measures to mitigate effects are considered in the PRow Management Plan. |
| | <p>Issue: Wylfa Newydd development</p> <p>Reason/Explanation: The inclusion of the proposed Wylfa Newydd development traffic information as part of the Transport Assessment. The latest information regarding Wylfa Newydd should be included in the TA as part of the DCO submission.</p> <p>National Grid will be required to demonstrate that they have obtained the latest evidence available to them from Horizon Nuclear Power.</p> | | The cumulative assessment for ES chapter 13 and the Transport Assessment (Document 5.13.2.1) is based upon the DCO submission for Wylfa Newydd. |

| Table 2: Gwynedd Council | | | |
|---|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>Issue: Traffic Safety and Control officer</p> <p>Reason/Explanation: The Council has requested that there should be a commitment for mitigation, control and monitoring measures to be secured by way of an agreed CTMP prior to submission, DCO Requirement, and where appropriate Section 106 Obligations, including the establishment and funding of a Transport Monitoring Group to facilitate engagement of the LHAs throughout implementation. These comments are still relevant and the Council request further clarification on this matter.</p> | | Discussions with the council on the need for a Transport Management Supervisor are ongoing and the OCTMP includes for a Traffic Control and Safety Officer and a Transport Review Group. |
| Volume 5, Chapter 14, Air Quality | | | |
| Does the information provide sufficient detail/clarity on National Grid's proposal/position? | Yes. The construction routes are presented, which had been missing in information prior to the most recent information batch. The information in the documents is complete and clear in presenting National Grid's position. | | Noted |
| Is the detail submitted adequate (i.e. in order to make an assessment)? | Yes. The construction routes are presented, which had been missing. The information in the documents is complete and clear in presenting National Grid's position. | | Noted |
| Is there anything missing? What are the gaps? Do you have any view on the impact assessment by National Grid? | Yes. Please see comments below. | | Noted |
| | <p>3.134 of Chapter 14, document 5.14:</p> <p>Construction receptors should be placed 50m from the site boundary along the whole site boundary (rather than just 50m from main activity areas) or their exclusion should be justified by reference to the work that will be carried on the site at that point.</p> | | Box 1 of the IAQM guidance refers to 'site boundary' for the screening of whether a dust assessment will 'normally' be required. However, Tables 2, 3 and 4 of the assessment method described in the guidance, which are used to determine the sensitivity of the area, refer to 'Distance from the Source', rather than site boundary. However, it is confirmed that the assessment is based on the site boundary (Order Limits) and wording in the chapter has been updated to reflect this. |

| Table 2: Gwynedd Council | | | |
|---------------------------------|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>4.4.6-4.4.7 of Chapter 14, document 5.14</p> <p>Dispersion modelling of emissions from NRMM at locations of greatest activity should be carried out. If NG are not proposing to carry out dispersion modelling, this should be justified by providing estimates of the number of vehicles/equipment, their Stage type and hours of operation. The operation - while temporary - will continue over several years, and therefore has the potential to affect long-term as well as short-term objectives. NRMM usage can be intensive and can give rise to high localised concentrations. This requires further evaluation within document 5.14.</p> | | NG are not proposing to carry out dispersion modelling of emissions from Non-Road Mobile Machinery (NRMM). Instead, the chapter has been updated to provide details on the plant to be used, the duration of use and the distance of these sources to the nearest air quality sensitive receptors. |
| | <p>1.3.2 7 Appendix 14.3, document 5.14.2.3</p> <p>The impact of terrain on the model results should be assessed via a sensitivity test. The terrain model assesses the impact of wider terrain on wind direction and turbulence not just the flow which is in the immediate vicinity of each source.</p> | | Appendix 14.3 now includes a sensitivity test using terrain data for the study area in the vicinity of the emergency generators. |
| | <p>1.6.3 – 1.6.7 Appendix 14.3, document 5.14.2.3</p> <p>It is not clear whether the calculation of period means and annualisation of diffusion tube data has taken into account the actual period that each tube was exposed e.g. 28 days, 30 days. This can have a significant effect on calculated period means. NG should provide clarification in the chapter.</p> | | Sampling periods are provided in Table 14.3.8. |
| | <p>1.6.8 – 1.6.16 Appendix 14.3, document 5.14.2.3</p> <p>The road traffic model verification used four different verification factors and up to a value of 6.60. This is quite varied considering the small domain and the factors are relatively large. The modelling and assumptions should be revisited to see whether more reasonable factors can be derived.</p> | | The verification exercise, as described in Appendix 14.3, has been updated following the completion of the 12 month NO2 diffusion tube survey. |
| | <p>1.8.1 Appendix 14.3, document 5.14.2.3</p> <p>The use of 60g/m3 as a surrogate for exceeding or not exceeding the hourly threshold is an approximation, not a reliable surrogate. It is suggested that hourly monitoring be put in place in the A55 layby(s), where parking motorists can be exposed over the relevant time period.</p> | | <p>Following the completion of the 12 month diffusion tube survey, the projected annual mean (2016) concentration at the A55 laybys in Gwynedd are 70.3 µg/m3 adjacent to the eastbound carriageway and 35.4 µg/m3 adjacent to the westbound carriageway.</p> <p>Outside of the chapter, as an enhancement measure, NG are currently liaising with Gwynedd Council and HNP over the hourly</p> |

| Table 2: Gwynedd Council | | | |
|---|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | monitoring of NO2 concentrations at the layby adjacent to the eastbound carriageway. |
| Are the mitigation proposals adequate and fit for purpose? | No. It would be appropriate for National Grid to state that all generators will achieve an emission limit of 400mg/Nm ³ of NOx, or lower, at 273K, 101.3kPa, 5% oxygen, dry gas, in order for the Council to ensure that the generators used are clean, rather than old generators or new generators with mitigation. | | <p>The emissions limit listed in the comment is from guidance that is relevant to London (published by the Mayor of London) and is not intended for use across the UK as a whole.</p> <p>The generator plant is for emergency use, with limited operation for testing and maintenance.</p> <p>The assessment described in the air quality chapter demonstrates that the operation of the emergency generator plant would not have a significant effect on local air quality, based on the assumptions modelled.</p> |
| | Hourly monitoring should be put in place in the A55 layby(s), where parking motorists can be exposed over the relevant time period. | | Outside of the chapter, as an enhancement measure, NG are currently liaising with Gwynedd Council and HNP over the hourly monitoring of NO2 concentrations at the layby adjacent to the eastbound carriageway. |
| Are there any changes or inconsistencies in the project detail following on from s42 or any Thematic Working Group? | N/A | | |
| OVERALL CONCLUSION OF FACTUAL ASSESSMENT | <p>The air quality chapter and appendices are complete and consistent, however could be improved by addressing the points explained above:</p> <p>Construction receptors</p> <p>Dispersion modelling of emissions from NRMM at locations of greatest</p> <p>The impact of terrain on the model results</p> <p>The calculation of period means and annualisation of diffusion tube</p> <p>Road traffic model verification</p> | | See response above |

| Table 2: Gwynedd Council | | | |
|--|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | The Council is unable to reach a position in relation to DCO Requirements or Statements of Common Ground until the following – in particular - has been resolved: Dispersion modelling of the NRMM or justification as to why this has not been undertaken / is judged not to be necessary. | | See response above |
| | Consideration of construction receptors within 50m of all of the site boundary (rather than just 50m from the main activity areas), or justification as to why this is not necessary. | | See response above |
| Volume 5, Chapter 15, Construction Noise and Vibration | | | |
| Does the information provide sufficient detail/clarity on National Grid's proposal/position? | Yes. National Grid has carried out a thorough assessment, and provided documentation which is generally clear and accessible. There are a number of points of detail regarding the assessment which are of concern, or could be differently presented to increase accessibility, which are set out in the response to questions below. | | Noted |
| | In general, the map locations for each measurement location is a helpful guide. The baseline applicability zones are marked clearly on the map. It has been noted that the zones have been amended in response to engagement which is appreciated. The figures are clear and helpfully enable interpretation of the Chapter's text. | | Noted |
| Is the detail submitted adequate (i.e. in order to make an assessment)? | In general, the detail submitted is adequate, however some comments have been provided to identify where the details of the assessment could be clearer. | | Noted |
| | The identification of significance is confusing. Table 15.7 has a range within which it identifies a Medium Magnitude of Construction Noise Effect. This value in Example 1 is in ≥ 60 & < 65 in terms of absolute level. It also meets the test of being > 5 dB above baseline. Logically this would place it in the 'Low' magnitude of effect, not Very Low as suggested. Text in paragraph 4.5.8 indicates that a significant effect would not be likely, but there is no link made between this test and the ranges of absolute noise level in Table 15.7. It is not clear whether the noise levels in Table 15.7 are construction noise alone or 'construction plus ambient'. To be | | It is noted that a greater than sign rather than a less than sign was used in the table. The table should read < 5 dB above baseline for the 'Low' magnitude criterion and < 1 dB above baseline for the 'Very Low' magnitude criterion. It is agreed that the example mentioned should read 'Low'. The Table has been amended for the final ES. |

| Table 2: Gwynedd Council | | | |
|---------------------------------|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | more accessible, the table could say how National Grid determine which criterion to use where there are ranges and a level relative to background. | | |
| | Example 3 - similar issue to Example 1, only here it is not clear which of the criteria should be used - the relative level or the range of absolute levels. The absolute level would put it in Low, but the 4dB increase would put it in Very Low. Words needed to explain which takes precedence - use of 'or' may not be helpful. | | As above. With the change noted under (a) above, Example 3 would remain as 'Low'. |
| | The construction assessment would be more accessible if it presented criteria identifying effects as either significant or not significant, rather than introducing the complexity of magnitudes of significance. | | Noted, however this approach is standard practice in EIA, and is particularly beneficial when undertaking cumulative effects assessment. |
| | Table 15.10 is copied from BS5228-2, and needs modification for use as criteria. The second row requires an upper bound to make it a range and thus work as an unambiguous criterion. This should be addressed to eliminate uncertainty. | | This has been updated to include the upper bound. It was confirmed at the thematic group meeting held on 12 th April that there are no further requirements here |
| | Interpretation of Table 15.16 would be greatly enhanced by having a plan which shows both the outline of the construction sites (as shown on Figure 15.2 etc.) and the medium and high sensitivity receptors identified. | | This has been updated in the final ES. |
| | Figure 15.1 sheet 6/6 has an area usage zone P1, which is not listed in Table 15.17 | | The plans have been updated and Zone P1, which is not used in the assessment, has been removed. |
| | The wording in Table 15.19 differs in some places from that in the CEMP reviewed in Batch 2. A number of these changes are highlighted below. Table 15.19 NV12 differs from the CEMP, by adding that monitoring would be carried out for comparison with limits. The Council would wish to see measurements to confirm plant noise and vibration assumptions where there is doubt regarding the source assumptions, and where they can be used to refine techniques to reduce adverse noise and/or vibration effects (e.g. charge refinement for blasting, as alluded to in NV32). | | Consistency of wording between Chapter and CEMP has been picked up for the final version of the ES. Noise limits etc. and proposals for noise monitoring have been identified in the NVMP (Document 7.9) . |
| | NV14 refers to provision of hoardings/barriers around worksites to ensure that noise limits are met. Again, the reference to noise limits was not in the CEMP, which stated 'as necessary' but did not state how 'necessary' was determined. | | Noise limits etc. have been identified in the NVMP (Document 7.9) . These will be used as a basis to determine where hoardings/barriers would be required. |

| Table 2: Gwynedd Council | | | |
|---------------------------------|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | There appears to be a mix of control measures referred to in this table i.e. noise limits in a Requirement, and s61 consents. The Council would anticipate further discussion in respect of the appropriate securing mechanism for such control of limits. As a general observation, the Council would consider it more appropriate for control measures to be secured under DCO Requirement reducing uncertainty on the scope and timing of such controls. | | The main control mechanism for construction noise and vibration will be the NVMP (Document 7.9). Noise limits have been identified in the NVMP. |
| | NV31 – The Council welcome the proposed reduction in working hours compared with those in the CEMP for surface drilling and grouting for the shafts such that it would not take place on Saturday afternoons or Sundays. It is noted that these working hours are contradicted by those in section 9.7.4. However, it is considered that 0700hrs start is too early for these activities. Also, these works should not be carried out on public/bank holidays. | | The matter of working hours has continued to be discussed. The working hours set out in the DCO and CEMP are those considered necessary in order to ensure the programme can be achieved and the connection date for Wylfa Newydd met. |
| | The Council would generally welcome the proposed measures in NV32 for the management of blasting noise and vibration, subject to the comments already provided on the CEMP. | | Noted |
| | NV34 - differs between the CEMP and Table 15.19, latter includes for a 100kW generator, whereas CEMP refers only to low voltage supply. CEMP is consistent with section 9.2.3. We also welcome the addition of NV38. | | The wording in the CEMP and the ES chapter has been updated to be consistent. |
| | Conclusion that criteria are exceeded/significant effects only occur at weekends supports the Council concerns that works that could give rise to observable adverse effects should not be undertaken Saturday afternoon/Sunday, and bank/public holidays to provide respite to residents. | | The matter of working hours has continued to be discussed. The working hours set out in the DCO and CEMP are those considered necessary in order to ensure the programme can be achieved and the connection date for Wylfa Newydd met. |
| | The Council considers that there is a possibility that receptors nearest to the actual pylon worksite and adjacent to the access track could see noisy works for in excess of 4 weeks. This is not indicated in the assessment as the access track works and construction site works are separated. Alone, neither exceeds 4 weeks. The Council would welcome a summary at the end of these two sections collectively which considered receptors affected by both elements of work and presenting the total duration over which the activities could occur, to demonstrate that the summation does not exceed the one month break-point. | | The wording of the chapter and assessments have been reviewed and updated in Section 9.7 'summary of effects from overhead line construction works'. |
| | Drill and blast is 6 to 9 months (s9.7.6), but the medium magnitude effects are described as very short term, resulting in no significant effect. Additional info is | | Short-term in this case refers to the duration of each blast, and is not to be confused with the term 'short-term' as used for other parts of the assessment. The wording has been revised to address |

| Table 2: Gwynedd Council | | | |
|---|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | needed to enable a judgement to be made as to whether the effects really are short term. | | this. It was discussed in the meeting held on 12 th April that the blast mat would be placed at the bottom of the blast area, not at the bottom of the shaft, and the wording has been updated in the ES Chapter. The blast mat would be selected by the contractor. |
| | The summary in Section 9.10.1 is welcomed, as it provides a helpful and accessible round up of the foregoing detail. | | Noted |
| | In areas where there is the potential for cumulative effects as appears here, a more effective way of managing cumulative noise may be for the Council to include an Informative in the s61 consent for the contractor. This could set out the need to make reasonable attempts to establish the anticipated noise generation and programme of works of the other project and to include this information in their s61 unless already bound by DCO Requirement (which would be the Council's preferred position as far as practicable). This will only be workable if both contractors are required to apply for s61 consents. | | <p>The assessment indicates that potential cumulative effects at receptors within Gwynedd are unlikely to be significant. Therefore, the need to provide additional information would only arise if there was a change within either the Proposed Development or the other developments.</p> <p>It is not reasonable to require a s61 for all parts or programme of the Proposed Development. However, a revised assessment would be required if there are any changes to working methods from those assessed within the Construction Noise and Vibration ES Chapter (Document 5.15). This requirement is stated within the NVMP (Document 7.4.2.9). This would include any revisions to cumulative effects, if they could arise.</p> <p>In the event that a contractor from another development were to change their working method, it is reasonable that they should be held responsible for assessing any resultant change to cumulative effects.</p> |
| | There are one or two typographical errors in the Legend compared with the title for Figure 3, which need resolving for the final documents to avoid confusion between options A and B construction assessment zones. | | These have been reviewed and the Figure has been updated. |
| Is there anything missing? What are the gaps? Do you have any view on the impact assessment by National Grid? | Comments have been provided below. | | Noted |

| Table 2: Gwynedd Council | | | |
|--|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | No plan showing location of noise measurement locations as a whole, only individual micro siting. This might be addressed by amendments or additional labelling in Figure 15.1. | | This information has been added to the Figure as requested. |
| | Table repeats the normal working hours, which the Council considers to be excessive (including Saturday afternoons and all day Sunday, with no exemption for public/bank holidays). It states that these hours would also be applied to HGV movements. The Council considers that HGV movements should be restricted such that they do not occur on Saturday afternoons, Sundays or bank/public holidays. The core working hours are described under the control and management measures section (9.25 and Table 15.19). The early hour at which piling could commence is of particular concern. The Council disputes that the core working hours as proposed represent a mitigation measure, as they are excessive for non-tunnelling support activities. | | The matter of working hours has continued to be discussed. The working hours set out in the DCO and CEMP are those considered necessary in order to ensure the programme can be achieved and the connection date for Wylfa Newydd met. |
| | Interpretation of Figure 15 could be enhanced by including the baseline applied to the zones as is shown for operation in appendix 16.2.1. GC: On sheet 6 of 6, there are two zones marked with an 'S', which is confusing. In determining which baseline is applied to the zone, the Council have made reference to Appendix 15.1. The map determining measurement location for LT_R (Unit 2) is missing. | | This Figure has been reviewed and updated. |
| | It is suggested that the pylon locations / numbers are shown on the figures. In addition, the figures do not clearly identify road links by reference to Appendix 15.13 page 2 First table "model input data" or receiver locations by reference to Appendix 15.13 second and third tables. | | This information has been added to the Figure as requested. |
| Are the mitigation proposals adequate and fit for purpose? | No, there are a number of areas which National Grid should consider set out below. | | Noted |
| | Shaft air overpressure/vibration – the Council do not necessarily agree that it has been demonstrated that this will not be an issue. Text included in material shared by National Grid down-plays the shaft and TBM chamber works, but these will be of a significant length of time judging by the shaft size and volume of spoil generated. The Council does not consider that it has been demonstrated that there would not be significant environmental effects. Control of this issue is best dealt with by a Requirement imposing limits (in which working hours can be imposed). This matter is subject to discussion with the Council. | | The main control mechanism for construction noise and vibration will be the NVMP (Document 7.9). Limits for shaft air overpressure / vibration have been identified in the NVMP. This will be controlled via a S61 consent. |

| Table 2: Gwynedd Council | | | |
|---------------------------------|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | The chapter refers to commitment in the NVMP - Doc 7.11 which the Council has yet to see. A check will be needed of the NVMP when received to check that adequate mitigation for 24 hour sites has been included. | | Mitigation measures for 24 hour sites have been provided in the ES and NVMP, although these are only outline. The specific details will need to be agreed when a contractor has been selected through the S61 process. |
| | Core working hours may be too long to prevent adverse impacts. Where works could give rise to adverse impacts on sensitive receptors: Working hours are too long Mon-Fri (in particular 0700 start); Saturday afternoon (1300-1900) working should not be generally permitted to provide respite; There should be no working on public or bank holidays (bar essential tunnelling support) (Section 4.3.8). | | The matter of working hours has continued to be discussed. The working hours set out in the DCO and CEMP are those considered necessary in order to ensure the programme can be achieved and the connection date for Wylfa Newydd met. |
| | Section 4.3.9 refers to 'works within the tunnelling construction compounds' being carried out 24 hours per day. Needs clarifying whether the works referred to are necessary to support the tunnelling, in which case they are necessary, or whether they are general construction related works which do not need to be carried out over the full 24 hour period. | | Only works related to tunnelling would be undertaken 24 hours per day. |
| | Only vibration from piling has been numerically calculated, which suggests that vibratory compaction has not been quantified. It would be helpful if this was explicitly stated here. (Section 4.4.7) | | The wording of the ES Chapter has been amended. |
| | Whilst the table in Section 8.1.1 is not intended to present mitigation, it sets out that mains power rather than generators will generally be used after site establishment for tunnelling sites. The Council welcome this mitigation (also listed in Section 9.2.3. On p87 it states that soil-screening plant may run 24 hours/day. It is not clear why this should be the case unless this is actually bentonite processing plant required to support the TBM. Section 9.7.14 refers to a slurry screening system (24 hour) associated with the actual tunnelling. The Council see no reason why spoil processing would need to be carried out at night with attendant risk of noise generation. | | This wording has been corrected to confirm that this is slurry screening plant and not soil screening plant. |
| | On p90, noise from HGVs is addressed, and it is stated that such movements would only occur during standard construction hours. The Council consider that the hours, which include Saturday afternoons and all day Sunday, with no exemption for public/bank holidays are not reasonable. | | The matter of working hours has continued to be discussed. The working hours set out in the DCO and CEMP are those considered necessary in order to ensure the programme can be achieved and the connection date for Wylfa Newydd met. |

| Table 2: Gwynedd Council | | | |
|---|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| Are there any changes or inconsistencies in the project detail following on from s42 or any Thematic Working Group? | No, the mapping broadly picks up issues raised during engagement. | | Noted |
| OVERALL CONCLUSION OF FACTUAL ASSESSMENT | The assessment is generally clear and is backed up by significant quantities of supporting information, although there are areas where the Council is not in full agreement as set out in the above. The Council recommends that these matters be addressed and information shared in advance of DCO submission to enhance confidence in the measures identified. | | Noted – see above responses |
| Volume 5, Chapter 16, Operational Noise | | | |
| Does the information provide sufficient detail/clarity on National Grid's proposal/position? | The information provided in the chapter is generally sufficient subject to the observations set out below. | | Noted |
| Is the detail submitted adequate (i.e. in order to make an assessment)? | No, please see comments set out below. | | Noted – see responses below |
| | Reference is made to National Grid report TR(T)94 in Section 2.3.6. This document does not appear to be publically available, so an interested member of the public would not be able to pick up the reference. Could this report be included as an appendix, or (more practically) made publically available on National Grid's website? | | Included in the ES as Appendix 16.6 (Document 5.16.2.6). |
| | The Methodology section provides a clear, broad, accessible description of the guidance, standards and reports relied upon in the assessment, which is welcomed. | | Noted |
| | In Table 16.20 in the description of the difference between the assessment of Option A and Option B the text includes a reference to [name redacted] (R4/01483) not being considered as a residential receptor under Option A. No explanation is provided. It may therefore be appropriate to add a cross reference to aid the reader | | Cross reference added to Table 16.20 (renumbered to Table 16.17). |

| Table 2: Gwynedd Council | | | |
|---|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | in understanding why the receptor is not being considered. Cross reference could be to Document 7.4.2.1, which states that the property would not be occupied. | | |
| | Section 7.2.9 describes a caravan park, and talks about an additional receptor code being assigned for it, which is deemed to be low sensitivity as it is commercial. It is not clear from the wording, or that of the previous paragraph, whether caravans which have not been specifically identified as being in residential or semi-residential use are being treated as medium sensitivity receptors or not. In Table 16.15 caravans are described as medium sensitivity, without caveat as to their use. | | Table 16.15 has been amended (now renumbered Table 16.13) and the text in Section 7.2 clarified. |
| | Gwynedd Council welcomes the information provided regarding the measures to be undertaken to minimise the chances of contamination of the conductors. | | Noted |
| Is there anything missing? What are the gaps? Do you have any view on the impact assessment by National Grid? | Yes, please see comments set out below. | | Noted – see responses below |
| | With respect to distribution transformers and drainage pumps, the Council agree that it should be possible to design this plant such that it is not audible beyond the site boundary. However, it is not clear from information in this table how this outcome will be secured. It will be appropriate to have a Planning Requirement to set noise limits to cover the totality of plant at the THHs/substations to ensure that the described outcome is achieved. (Table 16.2, paragraph 3.48). | | Agreed and discussed at the Operational Noise Thematic Group Meeting on 22 May 2018. All operational equipment at the THH sites would be covered by a DCO Requirement (DCO Schedule 3, Requirement 19, Operational Noise). |
| | Table 16.15 and section 4.6.3 set out receptor sensitivity. The table is not consistent with that in Chapter 15, which includes receptors such as hotels and places of worship. It may be that these types of receptor are only present within the construction scope, but this should be checked, as it impacts on the assessment outcome (see comment regarding Section 7.2.8 and 7.2.9). Furthermore, schools are defined as Low sensitivity (whereas education facilities were Medium for construction in Chapter 15), with the argument made that they are not used at night and this is when the worst case occurs. The Council believe that the table should reflect the actual sensitivity of the receptor, and be consistent across both construction and operation chapters. The assessment of significance would then take into account the fact that schools would not be used at night, and the outcome would be rated as not being significant when taking into account the factors applied | | There are differences in the sensitivity categories between the two chapters as they reflect how sensitive the receptor is to the type of effect. A footnote to paragraph 4.6.2 describes the rationale that would be applied to schools if identified within the study area. There are no schools in the study area, although other education establishments have been identified and assessed. |

| Table 2: Gwynedd Council | | | |
|---------------------------------|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | on a case-by case basis. This would be consistent with the method used for determining significance used in section 9. | | |
| | The use of language in paragraph 4.6.9 is a potential source of confusion in understanding the assessment. At this section, the language used differs to that in Chapter 15 in that it appears to switch to using the term 'significant impact' as the end point of the assessment. This is confusing and impairs the interpretation of the outcomes. Additional explanation, or a revision to ensure consistency across noise and vibration sub-topics would enable easier interpretation. | | Chapter 16 has been amended. |
| | Table 16.27 uses the word 'impact' to describe the outcome of the assessment. Clarification is needed to enable the reader to understand if this is a deliberate change compared with Chapter 15, and if so, how it should be interpreted compared with references to significant effects. | | As above |
| | The Council welcome the informative section regarding insulators, provided as discussed during the engagement process. However, no commitment is given to providing quieter forms of insulator, or information provided about whether noise will be considered as a deciding factor in the selection of insulator type. It is noted that potentially quieter types have been tested at Wylfa with respect to seeking noise reductions where salt deposition is an issue. The Council would like National Grid to specify where salt deposition or abnormally dusty areas could be an issue and what measures are to be employed to address these matters. | | Best practice would be followed to ensure the most appropriate insulator types and/or treatments are selected. Paragraph 8.2.19 in the ES states: <i>“For the new OHL, the most appropriate designs would be considered, taking into account, as far as practicable, local conditions, operational requirements and best practicable means from a noise perspective.”</i> |
| | As identified in the review of the CEMP, there is no information provided regarding prevention of contamination during storage of conductors at construction compounds, or of care during transportation. It is possible that conductors are brought directly to the stringing site and not kept at the construction compounds, but this has not been made clear. The description refers to NG codes of practice, and QA in transportation, but no clear commitments are set out. | | Appropriate commitments are set out in noise and vibration codes NV21 and NV22 in the CEMP (Document 7.4) |
| | During engagement with the Council to date, there was a request that information regarding the noise performance of the different conductors was included in the ES, to enable the reader and decision maker to understand the level of inherent mitigation associated with the choice of conductor. This does not appear to have been included and remains a recommendation. | | Information on the conductor type is included in Section 6 of the Preferred Route Option Selection Report (Document 2.1). |
| | Cumulative assessment - several projects may collectively, with the Proposed Scheme, have the potential to result in cumulative effects due to operational noise. | | Operational noise cumulative effects are considered in Section 10 of ES Chapter 16 Operational Noise (Document 5.16). Project- |

Table 2: Gwynedd Council

| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
|---|---|----------------|---|
| | The text indicates that assessments would be required, and it is likely that Planning Requirements would need to be imposed on all projects to ensure that an acceptable total noise budget was not exceeded. The Council requests that the necessary monitoring and mitigation measures are secured within the context of these overall caps on noise through a Requirement with a mechanism for the Council to agree prior to implementation. The Council's view is that there may also be some additional value in securing noise control post consent under COPA for works delivered at a more discrete or local level (where this is not practicable due to uncertainty within the DCO). Ongoing dialogue should be held between the parties and the local authority to discuss noise (and other issues (traffic etc.)) with a view to manage overall noise level at neighbouring sensitive receptors. | | wide cumulative assessment is set out in Chapter 20 (Document 5.20). All operational equipment at the THH sites would be covered by a DCO Requirement. (DCO Schedule 3, Requirement 20, Operational Noise) |
| Are the mitigation proposals adequate and fit for purpose? | Yes. The mitigation proposals are generally considered to be adequate, although further information is needed which establishes the measures to be undertaken to minimise the chances of contamination of the conductors. | | Noted |
| | The Council welcomes the commitment regarding exclusion of potential alternative pylon siting within the LoD where these could give rise to a potentially significant effects / impacts. | | This comment is noted. |
| | Mitigation is described elsewhere in Chapter 16, and forms the mitigation assumed in concluding that there are no significant effects from the THHs. The Council considers that an appropriate Planning Requirement is needed to ensure that the predicted rating levels are not exceeded. This should ensure that effective mitigation is provided to enable the conclusions as presented to be secured in the final design. | | Agreed and discussed at the Operational Noise Thematic Group Meeting on 22 May 2018. All operational equipment at the THH sites would be covered by a DCO Requirement (DCO Schedule 3, Requirement 19, Operational Noise). |
| | See comment on Cumulative Assessment in response to Question 3. | | Noted – see responses provided |
| Are there any changes or inconsistencies in the project detail following on from s42 or any Thematic Working Group? | N/A | | |
| OVERALL CONCLUSION OF | The information provided in the chapter is generally sufficient however further detail could be provided as set out above to enable clarity for the reader and to enhance confidence in the proposed measures of control for the project in particular. | | This comment is noted. |

| Table 2: Gwynedd Council | | | |
|---|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| FACTUAL ASSESSMENT | | | |
| Volume 5, Chapter 17. Socio-Economics | | | |
| | No comments received | | |
| Volume 5, Chapter 18. Agriculture | | | |
| | No comments received | | |
| Volume 5, Chapter 19. Intra-Project Effects | | | |
| Is the detail submitted adequate (i.e. in order to make an assessment)? | <p>The detail submitted is considered to be broadly adequate in the Landscape, Visual and Transport sections. Information on gaps is provided in response to Question 3 below.</p> <p>It is stated in paragraph 4.1.5 that: "<i>Where multiple sources of effects are already considered within one chapter, the findings are not repeated in this chapter, this includes Chapter 9 Ecology and Nature Conservation (Document 5.9) and Chapter 17 Socio-Economics (Document 5.17). For example, there may be many sources of effects that could affect a Site of Special Scientific Interest (SSSI); however all of these sources are already considered in ES Chapter 9.</i>" There is no further comment from ecology on this chapter and this is considered to be appropriate.</p> | | This comment is noted. |
| | Chapter 11 Geology, Hydrogeology and Ground Conditions has also been excluded from the assessment of intra-project effects. This is assumed to be due in part to the application of embedded mitigation measures, the CEMP and topic specific management plans e.g. waste, which we understand are intended to ensure that likely effects on common receptors are unlikely. It is noted that the assessment of intra-project cumulative effects have been considered in Chapter 11 and for soil quality (the only source) the effect has been determined to be negligible. | | Soil quality has been considered in the intra-project cumulative effects assessment. |

| Table 2: Gwynedd Council | | | |
|---|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | Air quality has not been considered in this chapter, which is considered to be appropriate. In relation to receptor R5/0289, reference is made to annual mean concentrations and construction noise. It is assumed that this has been placed here in error. | | Air Quality has now been considered in the intra-project effects assessment. |
| Is there anything missing? What are the gaps? Do you have any view on the impact assessment by National Grid? | | | |
| <u>Landscape and Visual / Historic Environment</u> | Paragraph 4.1.3 confirms that Chapter 10 Historic Environment has not been considered in the assessment of intra-project effects. If, as described in the Landscape chapter, effects on the settings of heritage assets (e.g. Registered Parks and Gardens) are being assessed in the Historic Environment Chapter, then any relevant effect could interact with those on the Landscape, communities, businesses, etc., and should therefore be included in this assessment of intra-project cumulative effects. | | The purpose of Chapter 19 is to consider intra-project cumulative effects on receptors that are identified in more than one chapter, to consider if the multiple sources of effect could lead to a cumulative effect. Historic environment assets are not a receptor of the landscape and visual assessment. Chapter 10 Historic Environment (Document 5.10) draws on the findings of those assessments when considering potential effects on the setting of historic assets. The effect on setting is therefore fully resolved within the chapter, and it therefore does not need consideration in Chapter 19 Intra-Project Cumulative Effects (Document 5.19). |
| | It is considered necessary to also include un-mitigated short and medium term minor, moderate and major effects, not just residual effects. This will allow more transparency in tailoring mitigation for intra-project cumulative effects where appropriate and the resultant residual effects to be more clearly presented. | | The intra-project effects assessment has only considered residual effects in its assessment. The implementation of mitigation measures through design, implementation of the CEMP and bespoke mitigation measures (as described in section 9 in technical chapters (Document 5.7-5.18)) would lead to receptors experiencing residual effects. Therefore these effects are considered in the intra-project effects assessment. |
| | The screening approach in Table 2 appears to be adequate. | | This comment is noted. |
| | Intra-project cumulative effects have not been assessed in Table 3 and so no comment on robustness of assessment or application of methodology can be provided. | | Table 3 has been completed. |

| Table 2: Gwynedd Council | | | |
|--|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| Are the mitigation proposals adequate and fit for purpose? | Table 2 is incomplete, suggesting that the assessment of intra-project effects has not yet been carried out. Mitigation has therefore not yet been proposed and GC is unable to comment on its adequacy at this stage. | | The intra-project effects assessment has been carried out in three stage process. First stage included a pre-screening exercise to determine those receptors which would potentially experience an intra-project cumulative effect. The second stage being the screening stage determined the significance of effects from different sources each receptor would experience during the construction and operational stage. Those receptors with two or more sources of effects with a significance value of Minor, Moderate or Major were brought through to the third stage of the intra-project effects assessment. Stage three of the Intra-Project Effects considered each receptor in turn to determine the intra-project cumulative significant effect. |
| OVERALL CONCLUSION | It is noted that a number of technical areas have not been included in Chapter 19 Intra Project-Effects. The Council considers it likely that there will be intra-project effects between Historic Environment and Landscape / Visual and the Council requests that National Grid re-visits the chapter screening exercise. | | See above response. |
| | The chapter provides detail on the approach to assessment and the screening of effects which is generally considered to be appropriate, however lacks detail on the assessment undertaken and mitigation proposals. It is therefore not possible to determine whether the approach taken is adequate. | | Noted |
| Volume 5, Chapter 20. Inter-Project Effects | | | |
| Does the information provide sufficient detail/clarity on National Grid's proposal/position? | The approach to the inter-project effects assessment has been set out in Paragraph 3.2.2 which includes Stage 1) to establish the 'zone of influence' for each topic and identify a list of developments Stage 2) to set criteria for inclusion / exclusion of developments Stage 3) to gather information about shortlisted developments Stage 4) to undertake a Cumulative Effects Assessment (CEA). | | Noted |
| | National Grid's suggested methodology is that if the impact of the proposed development (NWCP) is negligible, the potential for cumulative effects is prejudged to be zero, no matter what the significance of impact from the other developments. Table 20.3 does not treat (or implies it does not treat) impacts from the proposed and other developments in the same way. This fails to recognise the potential additive effects associated with multiple schemes (individually potentially giving rise | | <p>The EIA must remain proportionate and focused on likely significant effects, not every effect. It is considered reasonable to conclude that negligible effects have no potential to create a cumulative effect.</p> <p>This approach is consistent with the approach set out in PINS Advice Note 17 which deals with inter-project cumulative effects;</p> |

| Table 2: Gwynedd Council | | | |
|---|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | to less profound effects) combining at a community or receptor level to give more profound or significant effects. | | this states that ' <i>Whilst applicants should make a genuine attempt to assess the effects arising from multiple, individually non-significant effects, the CEA should be proportionate and not be any longer than is necessary to identify and assess any likely significant cumulative effects that are material to the decision making process, rather than cataloguing every conceivable effect that might occur.</i> ' |
| | The purpose of a cumulative assessment is surely to guard against an accumulation of negligible effects producing a significant impact and therefore the number and magnitude of impacts needs to be considered before they are ruled out. The proposed National Grid scheme and other development impacts should be approached in the same way where there is a likelihood for cumulative effect. | | See above |
| Is the detail submitted adequate (i.e. in order to make an assessment)? | | | |
| <u>Ecology</u> | The ecology chapter of the ES contains a cumulative impact assessment, and this chapter simply draws across summaries from that; please see specific comments on the ecology chapter provided at Batch 3 and below: In Table 20.8 there are numerous examples of where the assessment states that where no significant effect is predicted from the NWCP, alongside another "no significant effect" on the same receptor from another project, these cannot together create a significant cumulative impact. This is not the case and each such effect should be looked at in detail to consider if together they could raise the overall level of impact to a level that could be significant. This has a consequence for transparency in assessment of the effect and also in developing the appropriate mitigation. | | The cumulative assessment takes this approach when one or other of the effects alone is negligible, as it is not considered likely that negligible effects could generate a cumulative effect, given that they are 'barely perceptible'. This approach is not taken where it is simply 'not significant' as it is recognised that there is a potential for two minor effects to have a significant cumulative effect. |
| <u>Landscape and visual</u> | Tables 20.6 and 20.7 are largely incomplete therefore meaningful commentary is not possible. It is not clear how the CEA has been judged without any description of the effects resulting from each development. | | Noted. These have been updated in the final chapter. |
| Transport | As discussed at the TWG meeting on 8 th March, National Grid will be updating the transport chapters and associated information based on updated Horizon Nuclear Power application documents. The Inter-Project cumulative impacts should be reviewed using an updated programme of works for the Horizon and the National | | Noted. These have been updated in the final chapter. The cumulative effects section has been updated with the latest |

| Table 2: Gwynedd Council | | | |
|---|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | Grid programmes, as any changes to Horizon's works are likely to have implications for the National Grid programme. | | information on Wylfa Newydd Power Station programme which was not available when the draft chapter was written. |
| Is there anything missing? What are the gaps? Do you have any view on the impact assessment by National Grid? | <p>The assessment and mitigation proposals are largely incomplete. For example, National Grid has not commented on whether there are any residual effects associated with each receptor and have provided limited mitigation proposals in relation to the Proposed Development.</p> <p>It is also expected that this chapter, in particular Table 20.5, will be updated following further up to date information from the Horizon proposals.</p> | | Chapter 20 has been extensively updated since the draft version was issued, which was acknowledged as incomplete. This has included an update to take account of the Wylfa Newydd Power Station application. |
| Are the mitigation proposals adequate and fit for purpose? | The mitigation proposals are incomplete as National Grid has not proposed any mitigation associated with the Proposed Development. | | Chapter 20 has been extensively updated since the draft version was issued, which was acknowledged as incomplete. |
| OVERALL CONCLUSION | The chapter draws across summaries from each of the technical chapters | | Noted |
| | The Council is unable to comment on adequacy of mitigation as this has yet to be completed by National Grid. | | Noted |
| | The Council expects that this chapter will be updated as further assessment information on the Horizon Nuclear Power development becomes available. Traffic data for each scheme, in particular, is considered to be of importance to the cumulative impact assessment and the lack of this information has reduced the Council's capacity to comment on adequacy. | | Chapter 20 has been extensively updated since the draft version was issued, which was acknowledged as incomplete. This has included an update to take account of the Wylfa Newydd Power Station application. |
| Volume 5, Chapter 21. Combined Effects | | | |
| Does the information provide sufficient detail/clarity on National Grid's proposal/position? | There is a lack of detail provided in relation to the likely effects of the wider works. Although paragraph 1.1.2 confirms that the works will form part of separate planning consents, it is expected that further information will be submitted as part of the DCO application and an adequate assessment of combined effects undertaken, particularly in relation to traffic and transport. This is deemed reasonable insofar as there is a clear relationship between the works within the DCO and the wider works. | | The assessment of Combined Effects takes into account all information currently available regarding the Wider Works. |

| Table 2: Gwynedd Council | | | |
|---|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| Is the detail submitted adequate (i.e. in order to make an assessment)? | | | |
| <u>Ecology</u> | Table 21.8 identifies a temporary combined effect of the project plus reconductoring of the 4ZC cables around the Pentir substation; the text states that these could affect mobile receptors, such as birds. All other elements of wider works are scoped out based on separation distances. However, the text also mentions the reconductoring will include temporary land take so there could be habitat impacts as well as faunal effect (as stated later in 4.3.3). | | Assessment has been updated. |
| | 4.3.3 summarises combined effects and states: " <i>Temporary combined effects on more mobile species through temporary habitat loss could theoretically occur during construction, as the reconductoring of 4ZC is 4 km away from Pentir, however the probability of combined effects occurring, and being more significant than each element of work alone, is considered to be very low</i> ". This is considered reasonable and the Council assumes that any effects on ecological receptors will be adequately assessed as part of the wider works project(s) individually as these do not form part of the DCO application for the NWCP as confirmed in 1.1.2. | | Noted |
| | Note that this chapter refers to Figure 21.1 (Document 5.21.1.1); this illustrates the positions of the wider works, but it would seem we have not received this from National Grid. This has hindered review due to reliance on words in the text that suggest geographical separation exists. | | Noted – this is provided in the submitted chapter. |
| <u>Geology, Hydrogeology and Ground Conditions</u> | The screening assessment has concluded that there are combined receptors with all topic areas except for two, one being Geology, Hydrogeology and Ground Conditions. This would appear reasonable and is reflected in Table 21.7. | | Noted |
| <u>Landscape and Visual</u> | The assessment is high level but appears to be broadly adequate. | | Noted |
| <u>Transport</u> | Paragraph 3.3.1 states that " <i>Prior to the main construction works, access to the site would be constructed off the A487. During construction a range of vehicles would be accessing the site including concrete lorries, Heavy Good Vehicles (HGVs), articulated lorries and one Abnormal Indivisible Load (AIL) carrying the transformer</i> ". Information has not been provided in relation to the number of workers or how much traffic is likely to be generated. The Council seeks | | The assessment of Combined Effects takes into account all traffic information currently available regarding the Wider Works. |

| Table 2: Gwynedd Council | | | |
|---|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | clarification to ensure the cumulative impacts of this and the wider National Grid works are considered. | | |
| | Paragraph 3.3.2 states that " <i>A temporary construction compound would be established adjacent to the proposed substation to allow for the safe construction of the permanent operational substation high voltage compound. The construction compound area generally would comprise temporary cabins for offices and for welfare facilities for construction site workers. There also would be allocated areas for receiving deliveries, for storage of materials and equipment and (where required) for storage of waste items to be removed</i> ". The Council seeks clarification on the amount of workers that Bryncir Substation will generate and what the measures are to ensure issues are not created from worker parking. | | The description of the construction phase of Bryncir has been updated to provide indicative worker numbers. Parking would be within the construction compound. |
| Is there anything missing? What are the gaps? Do you have any view on the impact assessment by National Grid? | The following information is considered to be missing: Quantification of traffic generation, worker profile and car parking information | | The assessment of Combined Effects takes into account all information currently available regarding the Wider Works. |
| Are the mitigation proposals adequate and fit for purpose? | No mitigation has been proposed as part of this chapter. | | No mitigation is considered necessary |
| OVERALL CONCLUSION | The chapter appears to be broadly adequate however there are areas where further information could be provided in order to enable GC to understand the likely impacts, and mitigation required. It is expected that this will be covered in the planning applications associated with the wider works, however as there is the potential for cumulative effects to occur it is expected that information will be provided as part of the NWCP application to ensure that these are mitigated. | | The assessment of Combined Effects takes into account all information currently available regarding the Wider Works. |
| Volume 5, Document 5.23, No Significant Effects Report | | | |
| Does the information provide sufficient | Yes. The proposals for the project are set out in this and related documents, including construction, operation, maintenance and decommissioning information; | | Noted |

| Table 2: Gwynedd Council | | | |
|---|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| detail/clarity on National Grid's proposal/position? | therefore, these are considered adequate to allow effects on European Sites (SPA, pSPA, SAC, cSAC and Ramsar sites) to be assessed later in the NSER report. | | |
| Is the detail submitted adequate (i.e. in order to make an assessment)? | It should be noted that this is the first opportunity the Council has had to view the draft NSER; as detailed in 1.6.1, a draft of this NSER was not available at the time of the Section 42 consultation. It is helpful that National Grid has included HRA related responses that the Council and other parties made within Table 1.1 as part of Section 42 consultation, but it should be noted that to date National Grid has only shared a draft of the NSER with NRW (to the Council's knowledge). | | Noted |
| | Overall, the NSER covers the expected European Sites and assessed effects, alone and in combination as expected. The zones of influence appear correct when considering potential receptors and pathways for effect. | | Noted |
| | However, as detailed in comments in subsequent sections of this review response, there are some areas of potential weakness, centred around lack of detail provided around mitigation measures along with some methodological / consistency matters that should be discussed with NRW and National Grid. | | All mitigation measures relied on are secured by the draft DCO (Document 2.1). The draft document has been updated to remove potential inconsistencies and applications of approach. |
| Is there anything missing? What are the gaps? Do you have any view on the impact assessment by National Grid? | Yes. The following are a list of observations on the NSER where it is considered clarifications are required or further information supplied: | | See responses below |
| | Section 1.5.10: This appears to be extraneous text that could be removed. | | Text has been updated. |
| | Table 1.1, p3: The INNSMS should be available now; relying on this to be delivered at some future date as part of the CEMP (which is in itself too generic and lacking detail, see later comments) adds uncertainty and areas of potential challenge to the conclusions of the NSER. | | Section 10 of the CEMP (Document 7.4) requires an Invasive Non-Native Species Method Statement (INNSMS) to be produced in line with the Outline INNSMS (which includes a Biosecurity Risk Assessment (BRA)) as set out in the Biodiversity Mitigation Strategy (Document 7.7) |
| | 3.7 and 4.2.102: Although the NSER states 206,880 tonnes of arisings will be produced from tunnel works, the disposal or reuse of this significant amount of material is not covered in detail; if all is simply to be taken away by road this should be stated and confirmation provided that air quality, noise and wider environmental | | The assessment of air quality and noise effects takes into account the tunnel arisings being transported from site to the strategic road network. |

| Table 2: Gwynedd Council | | | |
|---------------------------------|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | effects associated with the disposal have been taken into account for both scenarios (arising generated in either Anglesey or Gwynedd). | | |
| | 4.2.99: Related to point above, if excavated natural rock is to be reused, details of what this will involve, including locations and timings need to be clarified. | | <p>The assessment is based on a worst case assumption that all tunnel arisings would be removed from site, as this would generate the largest number of vehicle movements.</p> <p>Tunnelling works are programmed in first. National Grid has included the opportunity for reuse of the material but this is not relied upon therefore any use would be a betterment. National Grid has also included the process in the CEMP to test the material before it is reused (Document 7.4).</p> |
| | 6.3.5: This refers to DCO Requirement 8 imposing a control relating to the Schedule of Environmental Commitments. This was not within the DCO issued as part of batch 2 and is requested for clarity. | | The Schedule of Environmental Commitments was submitted as part of the technical stakeholder review. |
| | Table 6.2: Regarding works in the Menai Strait we note that the potential for introduction of marine INNS is ruled out as no works are planned. If there were an issue with site drilling fluid release or other construction phase problems, the Council seeks confirmation that the use of vessels would not be required. | | Section 10 of the CEMP (Document 7.4) requires an Invasive Non-Native Species Method Statement (INNSMS) to be produced in line with the Outline INNSMS (which includes a Biosecurity Risk Assessment (BRA)) as set out in the Biodiversity Mitigation Strategy (Document 7.7). |
| | Table 6.2: Given the fact that the Dyfi Estuary SPA is 69.5km south of the Order Limits, it is not clear why this site is part of the assessment. The Council requests clarity on whether there is any evidence to suggest that the geese using the Dyfi Estuary use habitats within the project area at any point. | | This site is designated for Greenland White-fronted Goose which is known to utilise supporting habitat on Anglesey therefore this site has been considered within the HRA Report (Document 5.23). |
| | Table 6.4 (p318): We note that reef habitat has been excluded from consideration of effect from release of drilling fluid, yet is included for mudflat and sand flat habitats within the Menai Strait and Conwy Bay SAC. The Council requests justification for this, as this habitat occurs within the Order Limits and we assume would be at least as sensitive to any such effects as mudflats and sand flats. | | This habitat has now been included from consideration of effect from release of drilling fluid. Please refer to section 6 and section 7 of the HRA Report (Document 5.23). |
| | Table 6.4 (p319): It would be helpful to state where the nearest shallow inlets and bays features are within the Menai Strait and Conwy Bay SAC to support the contention that no pathway is present. | | The nearest SAC shallow inlets and bays features to the Order Limits of the Proposed Development are approximately 6 km to the east, where the Menai Strait opens out at Porth Penrhyn. |

| Table 2: Gwynedd Council | | | |
|---|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | 7.3.2: Regarding the application of reduction and mitigation measures, it should be noted that this refers to the Biodiversity Mitigation Strategy (Documents 7.9) that has not been provided to date. Other documents referred to here may also be missing. As the report places reliance on these in reaching conclusions on NSE, the Council is unable to agree with such conclusions at this stage. | | The Biodiversity Mitigation Strategy (Documents 7.7) is secured through Requirement 6 of the draft DCO (Document 2.1). |
| | Table 7.1 (p371): This contains various references to measures set out in the CEMP; however, at present the CEMP includes general principles and industry standard practices, potentially lacking details needed within a NSER to reach firm conclusions regarding effects on European Sites. As per earlier comment, the INNSMS should be available now to support the NSER, not at some point in the future. | | Section 10 of the CEMP (Document 7.4) requires an Invasive Non-Native Species Method Statement (INNSMS) to be produced in line with the Outline INNSMS (which includes a Biosecurity Risk Assessment (BRA)) as set out in the Biodiversity Mitigation Strategy (Document 7.7) |
| | Table 7.1 (p376): It is unclear why monitoring of slurry level is a measure that will prevent incidents. The Council considers this is simply a measure that will identify when such an event has happened, rather than a preventative measure. | | Should the pressure decrease this could indicate pressure imbalances and the slurry has entered surrounding rock therefore by monitoring this action can be taken to reduce the risk of a blow out of drilling fluid occurring. |
| Are the mitigation proposals adequate and fit for purpose? | No. As detailed in Section 3, in some areas, notably around the CEMP and associated missing documents, there appears to be a lack of location specific details necessary to support the conclusions of the NSER at this point. Further discussions on this matter should be held with NRW to confirm if this is a major cause for concern. The outcomes of such discussions should be shared with the Council. | | All mitigation measures relied on are secured by the draft DCO (Document 2.1). |
| | National Grid is reminded that conclusions on the potential to affect European Sites should be beyond reasonable scientific doubt, as indicated via various case law relating to the Habitats Regulations. | | Noted – the screening stage has been undertaken on this basis. |
| Are there any changes or inconsistencies in the project detail following on from s42 or any Thematic Working Group? | No. In terms of details relevant to European Sites, project details are as expected and reflect discussions at the ecology TWG to date. | | Noted |
| | Note that as identified above, the NSER was not shared with the Council at s42 stage. | | Noted |

| Table 2: Gwynedd Council | | | |
|--|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| OVERALL CONCLUSION OF FACTUAL ASSESSMENT | In general, the NSER covers the range of European Sites expected, using zones of influence that appear adequate for the receptors present. | | Noted |
| | The methodology for assessing NSE appears adequate, following accepted guidance for this type of assessment. | | Noted |
| | There are a number of potential inconsistencies and applications of approach in places where specific comments have been made. | | Noted – see relevant responses |
| | Embedded mitigation is presented, but lack details in key areas, notably the Drainage Management Plan and associated information that will be required to ensure water quality effects are controlled around the Anglesey Fens SAC / Anglesey and Llyn Fens Ramsar Site. | | The requirement for a drainage management plan is set out in section 8 of the CEMP (Document 7.4). This is secured by Requirement 6 of the draft DCO (Document 2.1). |
| | The approach to in-combination assessment appears incorrect, relying on spatial overlap only between projects (though this appears less relevant in Gwynedd than has been noted in Anglesey). | | The in-combination assessment presented in section 8 of the HRA Report (Document 5.23) considered whether there is a spatial overlap of the study areas (zones of influence) for Natura 2000 sites between the Proposed Development and the other developments considered in the in-combination assessment. |
| | As this is the first opportunity the Council has been offered to comment on the NSER, it is suggested that discussion is had with NRW who have previously commented on drafts of this document to explore any areas of joint concern before continuing the SoCG process. | | Noted |
| Volume 5, Document 5.26, Welsh Language Assessment | | | |
| | No comments received | | |
| Volume 5, Document 5.27, Wellbeing Report | | | |

| Table 2: Gwynedd Council | | | |
|--|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| Does the information provide sufficient detail/clarity on National Grid's proposal/position? | The Well-being report provided by National Grid is set out in a clear fashion, explaining what the objective of the report is and how it links to other processes/reports, although it does not provide very much explanation on what the project actually is in terms of routes, maps of location etc. as this is covered in other chapters of the ES. It would seem sensible for this report to be 'self-contained' with all relevant information to it being presented within (acknowledging that this might lead to a degree of repetition). | | The document has not been updated to include this information. But provides signposting to where this information can be found in other publically available documents. |
| | The Well-being report would benefit from acknowledging that the DCO application falls under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 taking into account transition arrangements for the EIA Regulations from May 2017. The report is considered to be clear in setting out the process of assessing the project from a well-being perspective pursuant to the EIA Regulations, however it is considered that National Grid could have gone much further in acknowledging the relationship between the project, the Council's role and the Wellbeing of Future Generations Act (WBFGA) and the Framework recommended by the Commissioner's Office therein. Further consideration of Thriving Places Wales (developed in partnership between Data Cymru and Happy City) would also be a valuable addition to the Well-being report. | | The report has been updated to reflect this change |
| Is the detail submitted adequate (i.e. in order to make an assessment)? | The methodology of how the well-being assessment has been carried out is clear and easy to follow. The outcomes of each stage are explained and information is clearly presented. | | Noted |
| | Minor comments to improve the report: 1.1.2 Third bullet point should specify that it was the participatory workshop recorded in Appendix 27.2 1.2.4 / 1.3.3: An explanation could be inserted here relating to how the well-being assessment predates the EIA Regulations May 2017 Footnote 15 – typo | | Noted – updates made. |
| | The report is lacking in detail which acknowledges the project, duties of the Council in respect of WBFGA and wider measures such as the Thriving Places Wales which aims to explore local strengths and needs, to help guide decisions and make priorities around a shared framework of progress. The Council acknowledges that this later initiative, and exploration of Welsh local authority area scoring is a more | | Noted – National Grid is giving further consideration to Thriving Places Wales and the golden thread of the Welsh language and will provide supplementary information in due course. |

| Table 2: Gwynedd Council | | | |
|---|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | recent development and one which the Council would encourage NG to consider in advance of DCO submission. | | |
| Is there anything missing? What are the gaps? Do you have any view on the impact assessment by National Grid? | A summary of missing information is provided below. Where National Grid has acknowledged further work is required, these have also been provided for completeness: | | Noted – see responses below |
| | Section 5.4 relates to the Construction Traffic Route Hazard Risk Register (CHRHRR) and has information contained in the Construction Traffic Management Plan (CTMP). This information was not included as part of the CTMP submitted in November 2017, and as such, no comments can be provided on the adequacy of this information. It is expected that this will be provided prior to National Grid's DCO submission to ensure adequacy of engagement with the Council. | | This comment appears not to relate to the WBR; this was raised at the time. |
| | Section 6.2 relates to Construction Route Groups, however further information is required on the anticipated number of HGV vehicles that will utilise LGV routes for Site Investigation purposes. | | This comment appears not to relate to the WBR; this was raised at the time. |
| | Section 8.9 provides an overview of the committed developments included in the assessments. National Grid has acknowledged the information relating to Wylfa Newydd Nuclear Power Station is based on an October 2017 submission date, and a construction start of 2019. It is expected that this PAC3 information included in the draft Transport Assessment will be updated as part of the DCO application. | | This comment appears not to relate to the WBR; this was raised at the time. |
| | A review of Figure 13.4 Traffic Count Locations has indicated that not all data has been provided in Annex C (e.g. ATC 15). All survey outputs are expected to be provided as part of the DCO application. | | This comment appears not to relate to the WBR; this was raised at the time. |
| | There has been no assessment undertaken of Britannia Bridge to understand the impacts of the Proposed Development at this location. It is anticipated that there are likely to be impacts relating to journey times and congestion at this location, and it is essential that the Transport Assessment fully illustrates what these impacts are likely to be. Significant impacts arising from the Proposed Development and other developments in the area are required to be included as part of the assessments undertaken to understand the cumulative impacts. | | This comment appears not to relate to the WBR; this was raised at the time. |

| Table 2: Gwynedd Council | | | |
|---|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | The AIL Report (document 7.7.2.1) has yet to be provided. It is expected that this will be provided in order to enable Gwynedd Council to undertake a review of the information in this document. | | This comment appears not to relate to the WBR; this was raised at the time. |
| Are the mitigation proposals adequate and fit for purpose? | Mitigation that has been proposed is reasonable for the effects that have been determined through NG's assessment. | | Noted |
| Are there any changes or inconsistencies in the project detail following on from s42 or any Thematic Working Group? | Not applicable | | Noted |
| OVERALL CONCLUSION OF FACTUAL ASSESSMENT | The report is generally considered to be adequate in fulfilling National Grid's duties under the EIA Regulations. Wider references to the WBFGA and Thriving Places Wales would be welcome additions, acknowledging the responsibilities of the Council in that regard. | | Noted |
| Volume 5, Document 5.28, Schedule of Mitigation | | | |
| Introduction | This note provides commentary on the Schedule of Mitigation from National Grid for the North Wales Connection Project pursuant to Regulation 5(2)(g) of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 Application Reference EN020015. It is understood that the aim of this document is to inform Statements of Common Ground. | | Noted |
| Observations | Section 1.2.1 Mitigation Measures – reference is made to the Schedule of Environmental Commitments (Document 7.4.2.1) as a key enabler of mitigation. It is crucial that details are received on this prior to DCO submission. The inference that all of these measures are secured through DCO Requirement (including CEMP Requirement 8). There is no reference to wider commitments to enhancement measures nor to the relationship between Mitigation and s106 in this section. Further detail would be welcome on the extent to which National Grid intend | | Enhancement measures are set out in the Enhancement Report (Document 7.13) |

| Table 2: Gwynedd Council | | | |
|---------------------------------|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | mitigation as set out in the Schedule to also address Intra and Inter Project effects. These elements are not widely covered at present. | | |
| | Each introductory section of each chapter / topic makes reference to the relevant chapter of the ES. The suggestion is that all mitigation measures which are set out in each of these chapters have been secured within the Planning Requirements or other measures specified within the Tables which follow. This requires confirmation. | | The purpose of the document is primarily to identify where mitigation measures are secured. |
| | Each Table in respect of Mitigation Measures would be more helpful if the severity of the effect were identified pre and post mitigation. The source of the effect is noted but not the significance. It is currently not possible to determine whether the mitigation measure secured has a material influence on the severity of the effect identified within each of the tables. It is also not possible to determine whether all effects are mitigated (even negligible as inferred in the document) or only those which are significant. | | A Summary of Residual Effects is now provided as Document 5.22 . |
| | The full details of the measures set out in the CEMP are vital in order to be assured of the confidence that GC can have in the mitigation (upon which reliance is being placed in the ES). | | The CEMP is provided as Document 7.4 , which is secured by Requirement 6 of the DCO. |
| | Table 2 Landscape – Section 1.2 <i>makes commitments to retain and reduce as far as practicable groups of trees</i> . There is a clear query around the deliverability / enforceability of such a measure given the uncertainty associated with it. | | Potential losses are identified in Document 4.11 Trees and Hedgerows Potentially Affected Plans. The aim will be to retain and reduce these losses where practicable. |
| | Reference to a Tree and Hedgerow Protection Strategy / Boundary Features Protection Strategy, Soil Management Plan (SMP), Pollution Incident Control Plan (PICP) etc. are welcome and reliance is being placed upon these measures – the full details of the strategies will need to be shared with GC for approval. This is assumed to be pre-commencement. This is a relevant statement for all wider strategies which have not been shared in full with GC to date. | | Noted |
| | Reference to Reinstatement Schemes in Table 2 is welcome and reliance is being placed upon it – the full details of that Strategy will need to be shared with GC for approval. This is assumed to be pre-commencement. | | Noted |
| | An Arboricultural Clerk of Works is referenced in Table 2. It is unclear whether this will be a direct appointment by National Grid, by the contractor or whether provision | | The Arboricultural Clerk of Works would be appointed by either National Grid or their Contractor. |

| Table 2: Gwynedd Council | | | |
|---------------------------------|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | would be expected to be made under s106. The scope of works / mechanism of control for this role would need to be agreed with GC. | | |
| | Reliance is being placed on the Landscape Mitigation Scheme secured under Requirement 9. GC would need to have confidence that the matters for agreement under Requirement 9 will be provided in advance in draft form for approval. | | The draft of Requirement 9 states that: <i>'Unless otherwise agreed with the relevant planning authority, no stage of the authorised development may commence until, for that stage, a mitigation planting scheme for the planting of trees, groups of trees, woodlands and hedgerows has been submitted to and approved by the relevant planning authority.'</i> |
| | Mitigation Planting is relied upon being secured through Requirement 9. GC would need to have full details of the scheme for prior approval pre-commencement of those works. | | The draft of Requirement 9 states that: <i>'Unless otherwise agreed with the relevant planning authority, no stage of the authorised development may commence until, for that stage, a mitigation planting scheme for the planting of trees, groups of trees, woodlands and hedgerows has been submitted to and approved by the relevant planning authority.'</i> |
| | Lighting measures (as set out in Table 3) will need to be controlled to a level which is agreed with GC via Requirement 6 (which relates to the CEMP). | | It is not proposed that the CEMP (Document 7.4) would be subject to approval from IACC. |
| | It is not clear what additional measures are to be introduced to offset visual effects associated with the project beyond landscape effects. This can be inferred but there are clearly common elements of mitigation strategy set out in Tables 2 and 3. It would be helpful to identify whether the mitigation secured is intended to address more than one form of effect and the extent to which this specific effect is addressed by that mitigation. It is in this topic (visual) that a broader commentary on opportunities for indirect mitigation (beyond direct physical location of effects) and enhancement would be expected. These are absent at present. | | The Enhancement Strategy (Document 7.13) sets out proposals for the Voluntary Residential Planting Scheme (VRPS) which will provide additional mitigation where the offer of planting is taken up. |
| | Tourist Attractions are cited as a receptor against which provisions are to be made for mitigation. This is an area where more clarity over the significance of effects at specific attractions and the proposed mitigation and effect of incorporating that mitigation would be helpful. General measures set out and to be secured via the CEMP (Requirement 6) are recognised but there is an absence of detail and specificity at present. | | Any mitigation measures required are identified in Chapter 17 Socio-Economics and have been updated in Document 5.28, Schedule of Mitigation. |

| Table 2: Gwynedd Council | | | |
|---------------------------------|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | Reference is made to reinstatement under measure R3 of the CEMP. Whilst reference to and inclusion within the CEMP provides a helpful framework of complementary measures there is a need for a high degree of specificity associated with reinstatement measures (relevant to the specific location / requirements therein) which will need to be reflected in proposals for GC approval. | | All information available is shown on CEMP Figure 1 Reinstatement Plans (Document 7.4.1.1). |
| | Section 1.1.3 of the Environmental Commitments Register confirms no departure of pylons beyond Limits of Deviation. It is assumed that this is the basis of assessment within the ES and also the related mitigation which is set out within the Schedule of Mitigation. | | Yes, the assessment presented in the ES includes consideration of flexibility available within the LOD |
| | Section 1.15 of the Environmental Commitments Register references certain properties not being occupied. It is unclear what this commitment is and clarity is sought. | | Noted – these plans are provided as Document 4.4. |
| | At the end of Table 3 there are a wide range of receptors including Communities, Private Views, Wales Coast Path, Promoted Viewpoints, Road, Rail etc. Clearly, these groups of receptors experience quite different effects associated with the proposed scheme and the reference to measures set out only within the Environmental Commitments Register (ECR) seems disproportionate to the scale and complexity of effects which are anticipated. GC would need to have confidence that the ECR contains sufficient specific information with respect to effects and the means to mitigate them. | | The commitments made in the Schedule of Environmental Commitments have been taken into account in concluding on the significance of effects on each of the receptors identified. |
| | On Chapter 4 Ecology it would be expected that reference would also be made to the measures to manage / mitigate effects upon the Natura 2000 site at Menai Strait from a Habitats Regulations Assessment perspective. This is picked up later in Table 4. | | Any measures required have been added into Chapter 9 Ecology and Nature Conservation (Document 5.9) and have been brought through into Document 5.28, Schedule of Mitigation. |
| | Cross cutting measures which are committed to and which are relevant are set out in Table 4. This approach is welcome and should be adopted through the Schedule of Mitigation. | | Noted |
| | CEMP Measures are listed by nomenclature in Table 4. A brief synopsis of each of those measures would be helpful in this table to confirm applicability in addressing mitigation needs. | | This has not been added, due to the risk of inconsistency. |

| Table 2: Gwynedd Council | | | |
|---------------------------------|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | Entries for Coed Pant Ladiwen CWS, Tyddyn-Heilyn CWS amongst others including Liverpool Bay SPA have not been completed. | | All measures relied upon in the ES are included in the Schedule. |
| | It is unclear why reference is made to Natura 2000 features where 'not significant effects' are noted and no mitigation is to be provided in Table 4. This might be clearer in the upfront section of this Chapter. | | Noted |
| | It is unclear why no mitigation has been set out for Coed Pont Ladi-wen CWS or Tyddyn-Heilyn CWS | | Tyddyn-Heilyn CWS will no longer be affected by the Proposed Development due to changes in the Order Limits. The only area of Order Limits that fall within the CWS and ancient woodland of Coed Pont Ladi-Wen CWS is that required for a visibility splay. This area comprises the grass verge already maintained for visibility for the existing junction. Minor mitigation has been included within the BMS (Document 7.7) to prevent encroachment. |
| | A common mitigation measure which is referenced throughout Table 6 is 'Fuel and chemical storage to be located a minimum of 8m away from any watercourse and 50m from an abstraction borehole.' The mitigation set out in Chapter 11 of the Draft Environmental Statement states 10m away from any watercourse. This needs to be amended for consistency. | | Text has been made consistent. |
| | The mitigation measures set out in Table 6 are very general and require more alignment of 'source of effect' and 'control and management measures & mitigation measures' to be meaningful. | | Noted; However it is confirmed that the updated Schedule of Mitigation (Document 5.28) includes all mitigation relied upon in the ES. |
| | Reference to Table 6 on Human Health includes a mitigation measure commencing with 'Subsequently....'. It is unclear whether this is an incomplete sentence. | | Noted – this has been addressed |
| | Table 7 relating to water quality and wider matters should also cross reference to Table 4 on Ecology (particularly in respect of features such as Tre'r Gof SSSI). Measures are generalised within the Schedule and specificity would be expected within the CEMP. | | Noted; However it is confirmed that the updated Schedule of Mitigation (Document 5.28) includes all mitigation relied upon in the ES. |
| | Table 8 records a wide range of receptor groups People at Home, People in workplaces, Sensitive groups (children, elderly and disabled), Sensitive locations etc. which are expected to experience a range of impacts. The reference to CTMP and the CEMP provides an indication of where mitigation measures will be | | Measures are often cross cutting, mitigating effects on a range of receptor types. Only where a bespoke measure is required for a specific receptor type, if this highlighted in the OCTMP (Document |

| Table 2: Gwynedd Council | | | |
|--|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | specified but not their nature. It is expected that detail will emerge for the CTMP and CEMP which will address each receptor type recorded in Table 8. | | 7.5) or CEMP (Document 7.4) , for example avoiding traffic on links during school drop off and pick up times. |
| | Table 9 should be cross referred to Table 4 for ecologically sensitive receptors. | | All measures relied upon in the ES are included in the Schedule. |
| | Chapter 10 makes reference to measures secured under COPA and evolving design. This should be set in the context of GC having confidence in overarching and project wide controls on noise and vibration secured under DCO Requirement. | | Additional information is provided in the Noise and Vibration Management Plan (Document 7.9) . |
| | It is unclear from the complaints handling procedure how noise complaints and the process of follow up will be communicated to GC. The monitoring regime associated with construction activities for the project and noise complaints should be communicated at regular intervals (to be agreed) to GC. | | There are currently no proposals to provide information about complaints or follow up to the council. |
| | Reference is made to tunnelling works being undertaken 'outside of core working hours and are not restricted'. Such control measures as might be necessary for these works are to be agreed with GC. | | The only control measures identified relate to noise and vibration and these are as set out in the Noise and Vibration Management Plan (Document 7.9) . |
| | Chapter 12 notes that there are no specific measure to mitigate socio-economic effects other than those expressed in other chapters. | | Noted; however it is confirmed that the updated Schedule of Mitigation (Document 5.28) includes all mitigation relied upon in the ES. |
| Volume 7, Other Documents, CEMP | | | |
| Does the information provide sufficient detail/clarity on National Grid's proposal/position? | | | |
| General comments | The CEMP makes reference to a number of strategies / plans which the Council understands are to be secured by DCO Planning Requirement, however this had not been shared with the Council at the time of the review. This includes: Biodiversity Mitigation Strategy, Construction Traffic Management Plan and Public Rights of Way Management Plan. It is requested that any outstanding plans are provided in advance of DCO submission to ensure adequate engagement with the Council on specific mitigation measures. | | The Outline Construction Traffic Management Plan and Outline Public Rights of Way Management Plan were both shared with the Council in advance of submission. |

| Table 2: Gwynedd Council | | | |
|--|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| Transport | Paragraph 2.2.6 refers to activities which may take place outside core working hours and includes “any highway works requested by the highway authority to be undertaken outside the core working hours”. It is expected that this will be agreed with the Council and secured under Requirement. | | The matter of working hours has continued to be discussed. The working hours set out in the DCO and CEMP are those considered necessary in order to ensure the programme can be achieved and the connection date for Wylfa Newydd met. |
| | Paragraph 3.3.1 refers to the production of a Travel Plan which supports and encourages sustainable travel (public transport, cycling, walking and car sharing). It is not clear whether active travel is supported by National Grid, as the draft Transport Assessment appears to suggest otherwise (by stating that cycling is prohibited during construction). Clarification is requested on the matter. | | Given the nature of the Proposed Development and National Grid’s inherent health and safety obligations, active travel to site Working Areas would not be permitted during the construction phase of the Proposed Development. |
| | Paragraph 3.5.1 refers to monitoring activities and notes that the contractor will undertake inspections including monitoring compliance with the CEMP. The Council has requested a dedicated Traffic Officer on a number of occasions to be funded through a S106 obligation which will enable the impacts of the Proposed Development to be assessed. | | National Grid is discussion with Gwynedd Council regarding resourcing. |
| Landscape | The level of detail is broadly adequate with notable exceptions where more detail is required, as set out below. | | Noted – see responses below |
| <u>Air quality and Noise and Vibration</u> | Table 7.4.1 General Measures – refers to the Construction Traffic Management Plan (CTMP), Document 7.12 which is to be secured by Requirement 5. It is expected that an updated version will be provided as part of future batches and in advance of DCO submission. | | Noted and as per comments on Chapter 13 above |
| | Table 7.4.2 – refers to Stakeholder Communications Plan (SCP) (not yet received) – which may contain the detail not provided in the CEMP with respect to detail of plans for communication with stakeholders. | | Production of the Stakeholder Communications Plan (SCP) is secured by Requirement 7. |
| | Section 1.6.4 – states that the Contractor’s EMS will be in accordance with NG’s EMS (1.6.3) prior to construction, and that the former EMS will address a number of issues including monitoring and review arrangements. The documents seen to date have not provided sufficient detail for the Council to satisfy itself that monitoring and review is adequate, and section 1.6.4 appears to state that the detail will only be provided when a contractor is appointed. Further detail regarding the management of construction noise and vibration is needed to enable an informed decision to be made regarding the acceptability of the proposals. The detail sought is of two types. | | Further detail regarding noise and vibration mitigation is provided in the Noise and Vibration Mitigation Strategy (Document 7.9). |

| Table 2: Gwynedd Council | | | |
|---------------------------------|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | The first is the noise and vibration expected from the works to be carried out, which it is anticipated will form part of the environmental statement topic chapter. At ES stage this will only be in outline but appropriate for decision making, but can practically be addressed in significant detail when the Contractor is on board and is setting out their programme, determining their working methods and selecting plant. The second is that which refers to how monitoring, review and stakeholder communications would be dealt with, which can therefore reasonably be provided at this stage. This may include, but not be limited to: how decision making would be used to establish monitoring protocols, the requirements for those carrying out monitoring and standards for the equipment to be used, procedures for determining what works should be controlled through DCO Requirement (or other specified means), procedures for N&V management in the event that trigger thresholds are exceeded, procedures for establishing vibration propagation from blasting works, etc. It is possible that this will be in the NVMP, but that has not yet been shared with the Council. | | |
| | Section 2.4 –The general principles of community engagement and public information are outlined. It will be important that the agency is in place in good time, and will be secured under Requirement or Obligation to service the project. | | Noted |
| | Sections 3.2 and 3.4 – the sections outline some measures that will be included in the Dust Management Plan (DuMP) in terms of general measures, site layout, storage and handling of materials, and communications and records. NG should follow the Institute of Air Quality Management's (IAQM's) Guidance on the assessment of dust from demolition and construction (2016). The measures which are listed are appropriate, but without a dust assessment of the various activities it is not possible to comment on whether they are sufficient. For large areas of activity, NG should use the IAQM's Guidance on the Assessment of Mineral Dust Impacts for Planning (2016), considering the meteorological characteristics of the site. | | The construction phase dust impacts have been considered in line with the appropriate guidance document (Guidance on the assessment of dust from demolition and construction, Institute of Air Quality Management, Version 1.1, February 2014), as agreed during the formal scoping exercise. |
| | Section 3.3 outlines some measures (in addition to those outlined in the Construction Traffic Management Plan (CTMP) (Document 7.7)) in relation to road traffic and energy plant / generators. This appears to be the first reference to energy plants throughout the ES and it may be useful for the chapter to provide detail on exactly what this is referring to. The measures which are listed appear to be appropriate, and the full analysis reported in the ES Chapter is considered to be sufficient. It is suggested that National Grid commit to a certain emission limit value | | <p>The emissions limit listed in the comment is from guidance that is relevant to London (published by the Mayor of London) and is not intended for use across the UK as a whole.</p> <p>The generator plant is for emergency use, with limited operation for testing and maintenance.</p> |

| Table 2: Gwynedd Council | | | |
|---------------------------------|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | for generators (suggested 400mg/Nm3 NOx at standard conditions) to ensure that the generator used is “clean”. The generator that has been modelled appears to meet this requirement. | | The assessment described in the air quality chapter demonstrates that the operation of the emergency generator plant would not have a significant effect on local air quality, based on the assumptions modelled. |
| | Depending on the number of non-road mobile machinery plant (NRMM) active at any time and the proximity of receptors to the construction activity, dispersion modelling of NRMM emissions may be required. Depending on the results of that modelling, the Council may request that a minimum EU standard for NRMM emissions be applied. | | NG are not proposing to carry out dispersion modelling of emissions from Non-Road Mobile Machinery (NRMM). Instead, the chapter has been updated to provide details on the plant to be used, the duration of use and the distance of these sources to the nearest air quality sensitive receptors. |
| | A full air quality assessment of the effect of construction traffic emissions on air concentrations will be needed before the effectiveness of mitigation measures can be assessed. Depending on the outcome of the assessment, the Council may request that a minimum EU standard for construction vehicles emissions be applied. | | An assessment of construction traffic emissions has been undertaken and has identified effects that are not considered to be significant. |
| | Section 3.5 briefly outlines the approach to monitoring. It says that a representative dust monitoring scheme will be agreed with the Local Authority and will commence at least three months or as soon as practicable thereafter before work commences on site. The locations, pollutants, alert levels and actions will have to be agreed with the Council. Dust and PM ₁₀ are mentioned. PM _{2.5} should also be monitored and NO ₂ may need to be monitored on the main routes, once they are defined. The Council has proposed alert levels that are informed by the baseline dust levels measured by the council. | | NG are currently liaising with stakeholders over monitoring requirements during the construction works. These are likely to be agreed as part of the Statement of Common Ground. |
| | General principles – 2.2.2 - core working hours. The Council consider that the ‘blanket’ core working hours are too long and disagree with the ‘blanket’ one hour set up and shut down (see also 2.2.7 below), where the works have potential for impact on sensitive receptors. The core hours should be shorter, and applications made for exceptions if longer hours are sought, supported by adequate evidence that there would not be adverse impacts. The CEMP or NVMP could be used to pre-agree the framework under which such applications could be made, and what information would need to be submitted. These matters could be secured through DCO Requirement. Weekend working hours, no acknowledgement of public or bank holidays, and the early hour at which piling could commence are of particular concern. Neither blasting nor piling should be permitted on public or bank holidays where it could give rise to adverse impacts on sensitive receptors. | | The matter of working hours has continued to be discussed. The working hours set out in the DCO and CEMP are those considered necessary in order to ensure the programme can be achieved and the connection date for Wylfa Newydd met. |

| Table 2: Gwynedd Council | | | |
|---------------------------------|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>2.2.6 bullet point 2 states that the following may take place outside of core working hours and are not restricted:</p> <p><i>‘the completion of operations commenced during the core working hours which cannot safely be stopped’.</i></p> <p>The Council do not agree with this clause unless accompanied by a clause requiring the programming of activities such that they can reasonably be expected to be completed within core hours. This should ensure that the proposed clause in 2.2.6 is only used when genuinely needed, and cannot be used to avoid compliance with the core working hours. It should only be needed where there are unforeseen issues on the day.</p> | | The matter of working hours has continued to be discussed. The working hours set out in the DCO and CEMP are those considered necessary in order to ensure the programme can be achieved and the connection date for Wylfa Newydd met. |
| | <p>2.2.6 final bullet point states:</p> <p><i>‘the completion of works delayed or held up by severe weather conditions which disrupted or interrupted normal construction activities’.</i></p> <p>The need for such a clause is understood, however there is a concern that the current wording allows the contractor to work evenings, nights & weekends if they are behind programme. This clause should only be included if accompanied by additional wording such as that suggested below in italics. Alternatively, a clause requiring programming of works and a requirement to notify local authorities to seek some form of dispensation from core working hours could be used. This could be triggered if the works to be completed would exceed a minimum time threshold.</p> <p><i>‘Undertaking construction works outside of the normal working hours in order to make good any programme slippage is not permitted under this clause.’</i></p> | | Noted for further discussion |
| | <p>2.2.7 Start up and close down hours: the Council do not consider that a ‘blanket’ start-up /close down hour is appropriate if there could be impact on sensitive receptors. These allowances were designed for linear infrastructure projects, where driving to the worksite could take a significant time and thus impact programme. If there are linear worksites (for example, where the access track runs for a significant distance across open land, remote from sensitive receptors) GC would consider an extension permitting half hour start-up and close down <u>by exception (and with the approach secured under Requirement)</u>, and evidenced as per comment on core working hours. Any such start-up/close down period arrangement must include a clear description of what may and may not be done during that start-up period. The</p> | | The matter of working hours has continued to be discussed. The working hours set out in the DCO and CEMP are those considered necessary in order to ensure the programme can be achieved and the connection date for Wylfa Newydd met. |

| Table 2: Gwynedd Council | | | |
|---------------------------------|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | following is an example to illustrate the principle: <i>The contractor will be permitted within the start-up time to allow staff to arrive at the site, prepare for the construction works and travel to their designated work area on site. Heavy plant and machinery will not be started within the start-up period or construction works undertaken within this period so as to cause disturbance beyond the site boundaries.</i> | | |
| | 4.2.2 NV12 states: 'Noise and vibration monitoring will be carried out as appropriate at or around residential...'. We have been unable to find a definition in the CEMP to assist us in understanding how what is 'appropriate' would be determined, by whom, or who would be consulted in its determination. This comment also applies to section 4.4.7. Given that the CEMP is a plan, the Council would expect to see wording on what would be done to determine appropriateness. | | Further detail regarding noise and vibration mitigation is provided in the Noise and Vibration Mitigation Strategy (Document 7.9). |
| | NV13 – working hours – refers to section 2.18 - this is in error if it is referring to this CEMP (working hours are in section 2.2). This also refers to Requirement 8. NV13 states: 'If necessary, consent will be sought by the contractor under Section 61 of the Control of Pollution Act 1974 (CoPA).' There is no description of how it is determined whether it is 'necessary' to seek a section 61 consent. We would expect criteria to be included here against which that necessity would be judged, and a definition of the process around the decision making, including engagement with the local authority to whom the application would be made. This comment also applies to the following sections, where 'necessary' is used: 4.2.4 NV14 final bullet, 4.4.5 NV35, 4.4.7 NV37. | | Further detail regarding noise and vibration mitigation is provided in the Noise and Vibration Mitigation Strategy (Document 7.9). |
| | 4.3.1 NV21 – this clause relates to minimising contamination of OHL cables during construction. It refers to manufacturing, transportation and stringing/installation of cables, but does not mention protection during storage at the construction compound. It is possible that this does not happen, but if it does, this would seem to be a critical location where contamination could occur, and therefore one where measures should be taken for protection. | | Noted |
| | 4.4.2 NV32 bullet 1 – states '...blast mat will be placed on the base of the shaft...to confine the generated noise and vibration...'. It is not clear how a mat on the base of the shaft will reduce noise and vibration generation. Clarification is needed to enable the reader to understand how the mat reduces noise and vibration generation (or propagation). | | The blast mat would be on the base of the shaft but above the explosives which would be below the base of the shaft. |

| Table 2: Gwynedd Council | | | |
|---------------------------------|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | 4.4.2 NV32 bullet 2 – see comments above re GP11 – the Council do not consider that blasting should take place on bank or public holidays where it could give rise to impacts to sensitive receptors and would seek a Requirement to that effect. | | The matter of working hours has continued to be discussed. The working hours set out in the DCO and CEMP are those considered necessary in order to ensure the programme can be achieved and the connection date for Wylfa Newydd met. |
| | 4.4.2 NV32 bullet 3 – there is insufficient information to enable judgement as to whether the engagement is likely to be adequate. It is considered that more detail should be provided here or within the stakeholder engagement plan regarding the type and timescales of notification of blasting. | | Production of the Stakeholder Communications Plan (SCP) is secured by Requirement 7. |
| | 4.4.2 NV32 bullet 5 - more detail should be provided here with respect to what is to be determined. We would anticipate that the first blasts would be used to determine the local vibration propagation characteristics, and that there would be a process by which this information would be used to advise the charges used for the blasting. The process of vibration measurement and determination of propagation, and route for this information to be fed back to the contractor in charge of blasting should be set. It is also noted that the clause refers only to measurement at the nearest noise sensitive receptor – this will not necessarily be the location worst affected by air overpressure, as air overpressure is highly dependent on metrological conditions. It is expected that outline predictions would be used to scope whether or not there was likely to be an issue with noise or vibration from blasting. A scoping assessment should also be offered with respect to determining whether condition surveys should be carried out for any buildings close to the blasting site. | | Further detail regarding noise and vibration mitigation is provided in the Noise and Vibration Mitigation Strategy (Document 7.9). |
| | 4.4.3 NV33 – the proposed criteria appear adequate, but we would expect to see proposed vibration criteria from blasting cited as being measured at a specific location with respect to the receptor, and to be related to the possible number of blasts per day, as set out in BS6472: Part 2 (2008). | | Further detail regarding noise and vibration mitigation is provided in the Noise and Vibration Mitigation Strategy (Document 7.9). |
| | 4.4.7 NV37 – as set out in 0, it is possible, and would provide confirmation that due process will be followed, if the process to be followed to determine whether something is ‘necessary’ is set out. In the particular case of the temporary construction railway (TCR), the decision-making process should be set out. For example, works set out in the bullet points in section 4.4.7 may only be needed within a certain distance of the tunnel alignment. Then within that distance, a monitoring process could be carried out within a stated timescale to measure vibration from the TCR. These measurements could then be used as the basis for vibration prediction to determine whether vibration limits might be exceeded. The | | Further detail regarding noise and vibration mitigation is provided in the Noise and Vibration Mitigation Strategy (Document 7.9). |

| Table 2: Gwynedd Council | | | |
|---|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>actions which would be taken if exceedance was predicted would then be some or all of the bullet points.</p> <p>However, it is likely that the contractor will need to order materials in advance and therefore some kind of prediction and design process will be needed prior to tunnelling commencing to ensure that adverse effects can be avoided.</p> | | |
| | 4.4.7 NV37 final bullet – comments in 0 above apply - a framework for how the locations/duration of monitoring is determined, who is consulted and what actions are taken depending on the outcomes should be included. | | Further detail regarding noise and vibration mitigation is provided in the Noise and Vibration Mitigation Strategy (Document 7.9). |
| | General point: there is no acknowledgement of the possibility of adverse effects on sensitive receptors close to roads being used to transport excavated material. As a result, there is no acknowledgment that there may be a need for off-site mitigation, or any process described for how this would be achieved. It is the norm for projects which could give rise to significant levels of noise which cannot be mitigated at source or through the outdoor propagation path to offer a noise insulation and temporary re-housing scheme. Under such a scheme, residents can receive protection in the event that significant effects are predicted, through a clear and equitable process, determined using published criteria. Such schemes usually also apply to noise arising from construction sites. | | Chapter 15 Construction Noise and Vibration (Document 5.15) confirms that there would be no significant effects related to construction traffic on construction traffic routes. |
| Is the detail submitted adequate (i.e. in order to make an assessment)? | Overall, the detail submitted is not considered to be adequate at this stage. | | Noted |
| <u>Landscape</u> <i>Existing Landscape Elements</i> | No arboricultural information or other existing landscape features is provided with the CEMP. The submitted information provides no detail of any measures to protect retained vegetation or other valued landscape elements from the works. The CEMP refers to Document 4.11 (Trees and Hedgerows Potentially Affected Plans) at 12.2.2 however these are not yet available for review. It is essential that these are provided for consultation prior to finalisation of the ES. Comments will be provided once reviewed. | | This information is shown on the Trees and Hedgerows Potentially Affected Plans (Document 4.11), the Figure 7.17 Effects on Landscape Elements (Document 5.7.1.17) and Figure 1 Reinstatement Plans (Document 7.4.1.1). Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13). |
| | As commented in respect of the works and construction plans, it is important that detailed plans are provided showing existing landscape elements to be protected and retained, those to be lost, and how and where these elements will be replaced or reinstated following construction. | | |

| Table 2: Gwynedd Council | | | |
|--|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | For example, the Construction Plans shared in Batch 1 show 7.5-12m wide access track swathes along the whole route. However, it is not clear whether these or any other parts of the development have been designed to minimise effects on landscape elements, nor is there any means of quantifying effects on different landscape elements and habitats. | | |
| <i>Reinstatement of Landscape Elements</i> | <p>The 4th bullet under 12.2.4 states that:</p> <p><i>“TH14 The Tree and Hedgerow Protection Strategy will include:...</i></p> <p><i>...reinstatement measures in accordance with Documents 5.7.1.12 to 5.7.1.16;...”</i></p> <p>These documents show some preliminary mitigation planting proposals. They do not relate to reinstatement of landscape elements.</p> <p>It is not clear whether post construction reinstatement of affected landscape elements throughout the order limits such as river crossings, hedgerows, trees, woodlands, boundaries and agricultural land is to be relied upon as mitigation in the EIA.</p> <p>All mitigation measures relied on in the EIA need to be secured and deliverable as part of the DCO within agreed DCO red line boundaries. The method of securing these works should be clear.</p> | | <p>This information is shown on Figure 7.17 Effects on Landscape Elements (Document 5.7.1.17) and Figure 1 Reinstatement Plans (Document 7.4.1.1). Additional planting would be offered to residents as part of the Voluntary Residential Planting Scheme (VRPS) as set out in the Enhancement Strategy (Document 7.13).</p> <p>The method of securing mitigation is shown in the Schedule of Mitigation (Document 5.28).</p> |
| | It is not considered adequate to simply commit to reinstate affected landscape features to their former condition. More detail (on the means of securing the works) and spatial information on the reinstatement of landscape elements is required. | | This information is shown on Figure 7.17 Effects on Landscape Elements (Document 5.7.1.17) and Figure 1 Reinstatement Plans (Document 7.4.1.1). |
| | <p>Details are required the locations and quantities, species and types of:</p> <ul style="list-style-type: none"> • re-seeding, • scrub planting • hedgerow planting • tree and woodland planting, • boundary creation (walls fences, gates etc.); | | All information available is shown on CEMP Figure 1 Reinstatement Plans (Document 7.4.1.1). |

| Table 2: Gwynedd Council | | | |
|--|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <ul style="list-style-type: none"> watercourses, footpaths. | | |
| | No restoration commitments are made in respect of temporary bridges and culverts. It is imperative that National Grid sets out how these elements and any associated foundations will be removed from site following construction, how they would be disposed of, and how the areas will be reinstated to their former condition. | | Text has been updated as appropriate. |
| <i>Topsoil</i> | Good quality site-won topsoil will be a critical part of the post construction reinstatement process. Therefore, further information should be provided regarding weed control, spreading and cultivation methods. | | Potential effects of the Proposed Development on topsoil are outlined in ES Chapter 18 Agriculture. Mitigation measures, including topsoil management, are outlined in Section 9 of ES Chapter 18, Agriculture (Document 5.18), Outline Waste Management Plan (Document 7.5), Outline Soil Management Plan (Document 7.10) and the CEMP (Document 7.4). |
| | <p>Further detail is required in respect of topsoil stripping, handling and storage during construction. Therefore, it considered imperative that a commitment is made to undertake this in line with the relevant British Standards and best practice. In particular, the CEMP proposes topsoil storage in bunds up to 4m high. This is possible if the soils are stored in very specific conditions and shaped bunds. In normal excavated condition, storage at this height would inevitably lead to compaction, anaerobic conditions and damage to microbial content and natural structure of large quantities of topsoil. Normal maximum height for successful storage of undried topsoil in bunds is 2.0m. Refer to the following two documents for specific guidance relating to topsoil storage.</p> <p>Section 5.4 of DEFRA Construction Code for the Sustainable Use of Soils on Construction Sites (2009), and</p> <p>BS 3882:2007 Specification for topsoil and requirements for use.</p> | | Information is provided in the Outline Soil Management Plan (Document 7.10) |
| | The CEMP should make reference to adherence to the guidance set out in the documents above. | | Information is provided in the Outline Soil Management Plan (Document 7.10) |
| <u>Air Quality and Noise and Vibration</u> | The detail is not considered to be adequate – please see comments raised above. | | Please see above comments. |

| Table 2: Gwynedd Council | | | |
|---|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| Is there anything missing? What are the gaps? Do you have any view on the impact assessment by National Grid? | As noted above. | | Noted |
| Are the mitigation proposals adequate and fit for purpose? | See additional requirements above in respect of details on reinstatement of landscape elements and topsoil management. See also comments on noise and vibration and air quality. | | See above |
| Are there any changes or inconsistencies in the project detail following on from s42 or any Thematic Working Group? | Not applicable. | | Noted |
| OVERALL CONCLUSION OF FACTUAL ASSESSMENT | There are a number of documents which, at the time of the reviews, it was expected will be shared in advance of DCO submission which will enable an adequate understanding of mitigation proposals. This includes: Biodiversity Mitigation Strategy Public Rights of Way Management Plan | | The PRow Management Plan (Document 7.6) was issued as a draft for comment. It has not been possible to share the BMS (Document 7.7) in advance of submission. |
| <u>Transport</u> | Further clarity is also requested with regards to: Active travel | | Given the nature of the Proposed Development and National Grid's inherent health and safety obligations, active travel to site Working Areas would not be permitted during the construction phase of the Proposed Development. |
| | Dedicated officer for monitoring activities through S106 obligation. | | National Grid is discussion with Gwynedd Council regarding resourcing. |
| <u>Landscape</u> | Additional spatial and detailed information required in respect of the following: Existing landscape elements to be removed and protected and retained; Topsoil management; and | | See above |

| Table 2: Gwynedd Council | | | |
|--|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | Reinstatement of Landscape elements. | | |
| <u>Air quality</u> | Conclusion on the CEMP is dependent on the review of the Air Quality ES chapter, which confirms that there are areas outstanding which the Council requires to be addressed prior to agreement on mitigation measures. | | All measures relied upon in the ES are included in the CEMP (Document 7.4) or other management documents. |
| <u>Noise and vibration</u> | The CEMP appears to be broadly appropriate. It is requested that the points raised in response to Question 1 are addressed to provide further clarity, and that the Noise and Vibration Management Plan is shared with the Council in advance of DCO submission. | | Further information is provided in the Noise and Vibration Management Plan (Document 7.9), however it has not been possible to issue a draft of this document prior to submission. |
| Volume 7, Other Documents, Schedule of Environmental Commitments | | | |
| | No comments received | | |
| Volume 7, Document 7.5 and 7.8 – Outline Waste Management Plan and Outline Materials Management Plan | | | |
| | The Waste Management Plan (WMP) and Materials Management Plan (MMP) are “outline” plans that provide a description and technical insight into the waste and materials management for the construction of the NG project. The WMP summarises legislation and policy and it indicates NG’s waste management principles and standards. It broadly identifies the waste types and quantities associated with the proposal (although there are some significant areas of omission as noted below), and identifies facilities within the region for recycling, disposal of wastes and also facilities for aggregate supply. | | Noted |
| | As this document feeds into a wider Environmental Statement (ES) as part of National Grid’s Development Consent Order application it is expected that issues relating to transport / highway impact, pollution/nuisances and other material considerations will be dealt with within other chapters of the ES and elsewhere within the application. These matters should be appropriately cross referenced | | These matters are dealt with in the technical chapters of the ES (Documents 5.7 to 5.18) |

| Table 2: Gwynedd Council | | | |
|---------------------------------|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | within the ES and any associated mitigation measures should be adequately detailed. The following comments have been provided: | | |
| | In general, the WMP is not considered to provide adequate detail in respect of the proposed waste strategy. | | Likely facilities are identified in the OWMP/OMMP however flexibility needs to be retained to take account of changing circumstances and the potential for new opportunities to arise. |
| | The WMP reports that approximately 300,000 tonnes of material will be excavated for the shaft and the Menai tunnel construction, and that 700,000 tonnes of aggregate will be required to construct the access tracks. There is no detailed information on the transportation of this material on the road network which makes it difficult to comment on the proposed use of the network and how this may impact on traffic, communities, air quality and noise. The effects associated with transportation must be adequately characterised in order for the Council (and we anticipate) DCO Examining Panel and Secretary of State in reaching a decision to be confident in the mitigation which will be necessary to address such effects. | | The assessment ends when traffic reaches the 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. |
| | The North Wales Minerals and Waste Planning Service continue to actively engage with NG to identify the quarries that could be utilised as part of the project. NG have not confirmed their preferred source of aggregate supply, but it is likely that economic viability, availability of supply and transport costs will influence the sub-contractor's decision in this regard. There are clearly a wide range of factors influencing the selection of suitable quarries and the Council would wish to remain fully engaged in understanding the potential effects arising from sourcing from potential providers and that a proposed form of mitigation is commensurate with predicted effects. | | Noted |
| | Based on 10 to 20 tonnes of material per vehicle ratio, it is considered that a figure of 300,000 tonnes of materials (noted in the WMP) has the potential to generate up to 30,000 trips (one-way). It is imperative that this is included in the Traffic and Transport chapter (Document 5.13) and the WMP should cross-reference this. All wider effects associated with such significant movements should be assessed within the ES including, but not limited to noise and air quality. Appropriate mitigation should be developed in response to the predicted effects. | | All necessary traffic movements are included in the Traffic and Transport chapter (Document 5.13) and the Transport Assessment (Document 5.13.2.1). These documents have been referenced in the OWMP. |

| Table 2: Gwynedd Council | | | |
|---------------------------------|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | Paragraph 4.3.1 confirms that waste arisings provided in the WMP are preliminary and a more accurate estimation would be calculated by the contractors before commencement of construction. Considering paragraph 6.9.5 refers to “an increasing awareness” amongst operators of the waste opportunities that may occur as a result of significant developments in North Wales, it is expected that National Grid will continue to undertake engagement with various facilities. | | In producing the Outline Waste Management Plan, facilities and regulatory bodies have been contacted and engagement will continue as appropriate. |
| | The ground investigation results reference is missing in paragraph 5.1.3 of the WMP. | | Reference now added. |
| | Paragraph 5.1.5 of the WMP notes that the alternative options for excavating the tunnel under the Menai from Gwynedd and from Anglesey will be retained to enable the contractor to determine the most “beneficial” direction. The anticipated decision making process is not clear, and an understanding of how the direction is expected to be determined would be helpful to ensure that environmental impacts are appropriately mitigated. Due to the relative close proximity of both options, it is considered unlikely that either proposal will have a significant effect upon the local waste infrastructure on the respective authority’s capacity (Gwynedd neu Môn) to secure sufficient void space, waste management capacity or market for the excavation arisings. Notwithstanding, both options should be considered in the EIA in order to take into account the environmental effect associated with both options where they remain credible and realistic. Wider environmental effects, particularly associated with transportation as noted above, must be considered in full. | | The environmental impacts of all tunnelling scenarios have been considered in the technical chapters (Documents 5.7 to 5.18) as appropriate. |
| | It is acknowledged that the documents are in outline form, however the North Wales Minerals and Waste Planning Service are in discussion with NG and their representatives as part of the overall planning process and are confident that the level of cooperation can help facilitate the correct decision and development of comprehensive and robust waste and materials management plans. There are reservations however, that the consideration of alternatives and the associated environmental effects have not been appropriately taken into account within the section (and possibly within other sections and chapters), given that the majority of the undertaking and development will be subject to contractual decision post determination. | | Noted; all necessary traffic movements are included in the Traffic and Transport chapter (Document 5.13) and the Transport Assessment (Document 5.13.2.1). 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 may arise. Any facilities used for recycling or deposition are covered by their own licences and permissions for traffic movements. |
| | Table 5.3 of the WMP provides a summary of the estimated materials required for the overhead line construction including access tracks (and subsequent use / | | The updated OWMP sets out the current proposals in this respect. The waste management strategy will depend in part of the |

Table 2: Gwynedd Council

| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
|---------------------------------|--|----------------|--|
| | disposal method). The strategy for managing this waste post-construction has not been adequately defined in the WMP. | | materials used for access track construction and flexibility is required on these aspects of the Proposed Development. |
| | The WMP summarises and states in paragraphs 6.1.2 and 6.1.3 that there will be limited opportunity to re-use the shaft and tunnel excavation material due to the expected construction programme which is due to involve access track construction in advance of tunnel excavation, and 6.1.6 confirms that opportunities on Anglesey for recycling and disposing of these materials is limited and would thus expect it to be transported to facilities in North Wales. Considering the significant amount of aggregate required for access track construction (and the likelihood as set out in the summary of the Plan that primary aggregates will be more appropriate than secondary or slate), it seems unwarranted that a proportion of this is not due to be considered for re-use in the 700,000 tonnes required for the construction of the temporary access tracks across the whole development. It is considered that further justification would be needed to enable the Council to be more sympathetic to the proposed approach. | | The current programme has allowed for some use of tunnel arisings for access track construction, subject to suitability. However, the OWMP discusses both scenarios to provide flexibility. |
| | Furthermore, paragraph 5.1.9 states that it is likely that excavated material from the shaft and tunnel would represent a “significant proportion of overall recycled aggregate production in the region” and that it is likely that it will be taken to a facility capable of storing it, or gradual release to the market. Further information is requested with regards to the facilities which have been considered for storage, as the WMP currently lacks this information. The environmental implications associated with storage of such a large volume of material should be characterised. | | Suitable facilities are likely to be selected by the contractor from those included in Appendix 2 of the OWMP. |
| | The Plans make reference to some materials being re-used on-site. It is requested that National Grid provide an indication as to how much could be re-used, as this will help to inform the extent to which this might mitigate the off-site impacts on the highways, via a reduction in traffic movements. | | Noted. The assessment presented in Traffic and Transport chapter (Document 5.13) and the Transport Assessment (Document 5.13.2.1) accounts for all material leaving site. However, if any can be retained this will serve to reduce the effects. |
| | The facilities (aggregates and waste) identified within the WMP all benefit from planning permissions. Should these facilities be utilised as part of the NG project they will be operated and developed within the confines of such permissions. Any application to amend operations or develop facilities further will be subject to the planning process and will be decided upon their own merits. Although the document outlines the facilities that could potentially be utilised, acknowledgement / evidence of available headroom based on current market trend appears to be | | Noted, facility capacity and project requirements are set out in the Outline Waste Management Plan. |

| Table 2: Gwynedd Council | | | |
|---------------------------------|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | lacking. Attempts should be made to characterise this headroom to give confidence in capacity. | | |
| | Section 6 of the WMP confirms that recycling facilities and demand for recycled material in Anglesey and North Wales are limited, for example Section 6.4 refers to Rhuddlan Bach and Nant Newydd quarries as the only facilities on the island which can recycle and dispose of inert waste. It appears to be clear that the facilities do not have the capacity to accommodate large proportions of material (relative to the amount that will be generated by the Proposed Development during in the form of tunnel and shaft construction and after in the form of access track material) and it is considered likely that there will be a requirement to transfer materials off Anglesey for recycling/re-use. The chapter concludes that, due to the limited capacity for recycling and disposal on Anglesey, a proportion of the shaft and tunnel arisings would likely be taken to facilities in North Wales and North West England. This is likely to result in impacts on Gwynedd's road network and associated impacts on dust and noise, and the Council requests further information in order to clearly understand how and where the excess material is likely to be managed, transported to and the associated transport strategy. The North Wales Minerals and Waste Planning Service will continue to liaise with NG in order to review the list of sites and to update on any changes on the local/regional capacity to supply aggregates and manage waste arisings. Again, we would draw the attention of the NG to the consideration of alternatives that requires consideration as part of the EIA process. Notwithstanding the outline provision in the WMP and MMP, it is considered a requirement to provide a detailed CEMP immediately prior to the implementation of the project or, within a specified timescale and it should be the subject of a planning requirement. | | Likely facilities are identified in the OWMP/OMMP however flexibility needs to be retained to take account of changing circumstances and the potential for new opportunities to arise. |
| | It is recommended that the plan looks in detail at options and ideas to deal with the temporary road construction material once its use has ceased, for example, whether there is a local market for this secondary aggregate or whether there is scope for the material to be used on respective agricultural holdings. | | See above |
| | Paragraph 6.9.5 refers to "an increasing awareness" amongst waste operators of the opportunities that may occur through a number of significant developments in the region. There is however no reference to specific opportunities and the lack of apparent strategy for managing the waste arisings (relating to 300,000 tonnes of tunnel and shaft excavation and the > 700,000 tonnes of temporary access track material once no longer needed) is of concern. | | See above |

| Table 2: Gwynedd Council | | | |
|--|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | Table 5.3 refers to National Grid's proposal to re-use any topsoil that has been removed to make way for access tracks following reinstatement. It is not clear where this relatively significant amount of material is due to be stored. | | Topsoil would be primarily for reinstatement. It would be stored immediately adjacent to the access track to ensure it would be returned to the same land parcel. |
| | The North Wales Minerals and Waste Planning Service have been in discussion with the NG in respect of the timing of works for haulage tracks required in the construction of the project and the requirement to re-use or dispose of excavation arisings derived from the construction of the shaft and Menai Straits tunnel. It is hoped that such discussions will progress within the planning application stage, to phase and re-use materials within the overall development especially that of shaft and tunnel arisings (200,000 – 300,000 tonnes) within the tunnel head house development and especially that of the 700,000 tonnes necessary for temporary track creation. | | Noted. |
| | The documentation falls short in acknowledging the proposal cumulatively with current market forces and also on possible other large developments that will be happening at a similar time; specifically, Wylfa Newydd Nuclear Power Station. There are also active discussions as to the development of a possible Third Menai Crossing being developed between 2020 and 2023, which may need to be considered in respect of combined impacts. | | Noted. All cumulative effects with other developments, including those cited, are presented in Chapter 20 Inter-Project Cumulative Effects (Document 5.20). |
| | The Outline Materials Management Plan provides general guidance on the re-use of materials however does not provide any further specific information to the OWMP. | | Noted. |
| OVERALL CONCLUSION OF FACTUAL ASSESSMENT | <p>It is considered that National Grid could go further in providing details of a proposed strategy in particular in respect of:</p> <p>Transport requirements and impact on the road network;</p> <p>Decision making process for determining direction of tunnel construction;</p> <p>Further information on proposed re-use of materials on site, and justification for not appearing to actively take steps to re-use materials arising from shaft and tunnel construction;</p> <p>Likely facilities to be used if storage of excavated material is required; and</p> <p>Storage of material to be re-used following re-instatement.</p> | | See previous comments. |

| Table 2: Gwynedd Council | | | |
|---------------------------------|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | It is acknowledged that the NG have stated that the contractor will determine which quarries and waste facilities will be utilised, however as mentioned previously, as part of the EIA process, mitigation and alternative options will need to be considered so that the environmental effects associated with all possible options are considered. | | Noted; all necessary traffic movements are included in the Traffic and Transport chapter (Document 5.13) and the Transport Assessment (Document 5.13.2.1). 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 may arise. Any facilities used for recycling or deposition are covered by their own licences and permissions for traffic movements.. |
| | The Council will work with the North Wales Minerals and Waste Planning Services, Isle of Anglesey County Council, National Grid, the Inspectorate and other stakeholders in suggesting mitigation measures and will strive to lessen the impacts of the proposal on the environment, highway and local amenity both locally and regionally as part of the application process. | | Noted. |

Page intentionally blank

4 Natural Resources Wales

Page intentionally blank

| Table 3: Natural Resources Wales Comments | | | |
|---|---|----------------|------------------------------------|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| Protected Landscapes | | | |
| | NRW consider the Draft Environmental Statement (DES) chapters provide sufficient information to assess the likely effects of the proposed 400kV overhead line upon the Isle of Anglesey Area of Outstanding Natural Beauty (AONB) and Snowdonia National Park. | | Noted |
| | The proposed development lies outside of these designated landscapes, but given its proximity, the major scale of this proposed linear development and the availability of open views, with some from elevated locations within these areas, the development has the potential to indirectly affect perceptions and the experience of natural beauty character and special qualities of the designated landscapes. | | Noted |
| Chapter 7 Landscape | The DES assessment of landscape effects upon designated landscapes indicates: Negligible construction, year 1 and year 15 effect upon Snowdonia National Park. Minor adverse construction, year 1 and year 15 effect upon the Isle of Anglesey AONB. This level of effect would affect the AONB north coast, AONB eastern inland and AONB south coast. These effects are not significant. | | Noted |
| | NRW concur with this assessment. In summary, this is due to - viewing distance; the established presence of 400kV overhead electricity infrastructure and in the north Wylfa existing and proposed power stations; and mitigation by design (spacing of pylon towers to match and create visual balance with existing OHLs, undergrounding to avoid the Menai Strait and AONB coastline, low height pylons next to the CSESs). | | Noted |
| | NRW's previous comments requiring more specific consideration of the designated landscapes, their special qualities and development's location within the setting of these landscapes, has been comprehensively addressed within the landscape and visual chapters. The sensitivity assessment has been completed and this is the first sight NRW has had of this information. The methodological approach is appropriate, with variations in sensitivity to account for the AONB noted in the assessment, even if these aren't fully represented on the colour key plan. | | Noted |

| Table 3: Natural Resources Wales Comments | | | |
|---|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | The setting of the AONB has been assessed as a landscape receptor in its own right, with some moderate (significant) direct effects assessed resulting from construction and operation phases. | | Noted |
| | Whilst the assessment of direct effects on the setting of the AONB appears to support the wording of Joint LDP Policy AMG3, it is our view that the primary reason for considering 'setting' is to ensure the indirect effects of development upon the experience of natural beauty are appropriately considered (relates to the purpose of the designation). The viewpoint assessment sheets provide useful information on this nature of effect and have allowed us to judge the visual setting issues. Some clarification of this within the Landscape chapter of the ES would be welcomed | | Noted |
| Chapter 8 Visual Assessment: | The report addresses views by receptor type, but provides no co-ordinated comment on views that contribute to the understanding of effects upon the AONB and National Park. For completeness NRW would recommend a section in the summary focus on the AONB and National Park. Below we have scrutinised the points we consider to be relevant. | | Chapter 7, Landscape Assessment (Document 5.7) now references the viewpoint assessment in the effects of the ANOB and National Park. |
| | Appendix 8.2 Viewpoint assessment sets out the assessment clearly, but stops short in assessing significance. We recognise that the viewpoint can have receptors of varying susceptibility, this could however be captured in tabular form for clarity. | | Each of the receptor assessments draws information from the viewpoint assessment. Susceptibility is shown for each receptors on the viewpoint sheets and within the relevant assessments and is summarised in the summary table at the end of the chapter. |
| | From our review of the viewpoint assessment, we note that views towards the development comprise 28 viewpoints from the AONB, no viewpoints from Snowdonia National Park (2 just outside within the SLA). The professional judgement applied to value has in the main been evenly applied. The value of viewpoint 1/20 view from the road within the AONB near Ty-Du however appears to have been slightly underrepresented. We recognise there are some detractors, but in the main there is a strong presence of natural beauty elements evident here in landform, ruggedness, older farm buildings found within farmland just inland from the coast. We concur with the low magnitude of change, so changes to the value of the view would not trigger a significant effect. | | Values have been reviewed and ensured consistent with other viewpoints. |
| | The highest magnitude of change assessed upon views from the AONB are at medium – low scale, which applying Table 8.6: Definition of Significance and associated diagram places the effect at just below moderate (significant). This has been assessed for viewpoints: | | Noted |

| Table 3: Natural Resources Wales Comments | | | |
|---|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | Viewpoint 1/18: view from llanbadrig point near ty'n-llan and st patrick's church Viewpoint 3/03, 3/05 and 3/06 views from mynydd bodafon Viewpoint 3/11: view from road between maenaddwyn and brynteg Viewpoint 6/04: view from wales coast path on prow on a4080 near aber-braint (construction activity only) | | |
| | This suggests localised points within the AONB where development change would be at variance with the existing view. | | Noted |
| | The mitigation proposals and CEMP remain important to restoring and reconnecting any features disturbed during construction activity. Now that the visual change within views from AONB are better known, this should direct the focus of the landscape mitigation scheme. | | Noted; reinstatement proposals relied upon in the ES are those set out in CEMP Figure 1 Reinstatement Plans (Document 7.4.1.1); further information regarding certain landscape elements is included in the CEMP (Document 7.4). |
| Chapter 9 Protected Species | | | |
| Bats | | | |
| Appendix 9.7 | 4. We note that a total of 4 trees were identified as supporting bat roosts (Tree ref 1991 W7 C - Pip spp transitional roost; Tree ref 1991 W7 E - Pip spp transitional roost; Tree ref 2039 T2 C - Soprano pip transitional roost (n=1); Tree ref 5032 T2 - Species unknown, 1 no. bat). | | Noted. Updated surveys conducted in 2018 have provided further information, which is summarised in Appendix 9.10 Bat Roost Report (Document 5.9.2.10) and chapter 5.9 Ecology and Nature Conservation (Document 5.9). Full results will be provided in an addendum. This additional information it is not considered essential to the assessment |
| | 5. NRW consider the bat survey and assessment to be satisfactory for the purposes of informing the planning decision making process. | | Noted. |
| Assessment in 5.9 | 7. Table 9.20: NRW agree with the assessment of potential effects during different stages of the project on bats. | | Noted. |
| | 8. NRW has no objection to the proposed approach to bat mitigation and compensation. | | Noted. |

| Table 3: Natural Resources Wales Comments | | | |
|---|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | 9. NRW concur that a European Protected Species derogation licence is required in respect of bats. | | Noted |
| | 10. The ES makes no reference to the Favourable Conservation Status (FCS) for each of the species and local populations of bat identified within the order area. NRW would recommend this is included for completeness. Notwithstanding this, NRW consider the proposal is not likely to be detrimental to the maintenance of the FCS of each of the local populations of bat that are potentially affected by the proposals. | | Reference has now been made to the favourable conservation status where appropriate. |
| Otter | | | |
| Appendix 9.8 | 13. Cofnod the local record centre (LRC) provided 61 records of otter / field signs of otter within 2km of the scheme. The majority of records were of spraints. Field surveys conducted by National Grid suggested that most water courses were unsuitable for holt creation. | | Noted |
| | 14. Field signs of otter were found at two localities- the Meddanen tributary of the Afon Wygyr (spraint and Mammal run) and the Braint Bifurcation tributary of the River Braint (spraints and foot prints). | | Noted |
| | 15. NRW consider the otter survey and assessment to be satisfactory for the purposes of informing the planning decision making process. | | Noted. |
| Assessment 5.9 | 17. Table 9.20: NRW agree with the assessment of potential effects during different stages of the project on otter. | | Noted |
| | 18. NRW has no objection to the proposed approach to otter mitigation. The approach based on survey results is both appropriate and proportionate. | | Noted |
| | 19. NRW is satisfied the proposal is not likely to be detrimental to the maintenance of the favourable conservation status of the local population of otters. However, the ES makes no reference to FCS of the local population of otter (which based on genetics can be equated to north and mid Wales). We would recommend its inclusion in the ES for completeness. | | Reference has now been made to the favourable conservation status where appropriate. |
| | 20. We note that derogation licences are not likely to be required for this species. | | Noted |

| Table 3: Natural Resources Wales Comments | | | |
|---|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| Water Vole | | | |
| Appendix 9.8 | 23. Cofnod returned relatively few records of the species. Surveys confirmed the presence of the species within two water courses (Afon Goch and Afon Braint). | | Noted |
| | 24. NRW consider the water vole survey and assessment to be satisfactory for the purposes of informing the planning decision making process. | | Noted |
| | 25. The assessment concluded that watercourses to be crossed by temporary access tracks supported limited occurrence of the species. | | Noted |
| Assessment 5.9 | 27. Table 9.20: NRW agree with the assessment of potential effects during different stages of the project on water vole. | | Noted. |
| | 28. NRW is satisfied that with the proposed mitigation in respect of water vole is appropriate. | | Noted. |
| | 29. NRW would note that the ES states that there is a potential licensing requirement if water vole 'places of shelter' are located within 30m of the working area of the proposal. | | Noted. Known areas of water vole 'places of shelter' within the Order Limits are secured within the Schedule of Environmental Commitments (Document 7.4.2.1). Pre-construction surveys will be undertaken to establish if they have moved within 30 m of areas of works. |
| Great Crested Newt | | | |
| Appendix 9.6 | 32. It should be noted in the ES that GCN are not just protected under the Conservation of Habitats and Species Regulations 2017, but also partially protected under the Wildlife and Countryside Act 2000 (ass amended). | | The ecology chapter 5.9, Ecology and Nature Conservation (Document 5.9) has been updated to include the Countryside Rights of Way Act 2000 as the Wildlife and Countryside Act 1981 has already been stated. |
| | 33. 14 ponds were found to support GCN. | | Noted. |
| Assessment 5.9 | 35. Table 9.20: NRW agree with the assessment of potential effects during different stages of the project on GCN | | Noted. |
| | 36. NRW is satisfied with the overall proposed approach to mitigating impacts on GCN | | Noted. |

| Table 3: Natural Resources Wales Comments | | | |
|---|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | 37. We agree with the principle of using of amphibian fencing as mitigation. However the specification, location and proposed maintenance of this fencing needs to be confirmed to ensure that it is fit for purpose. | | The specification and proposals are provided in the BMS (Document 7.7); full details will be included in the EPS GCN 'ghost' and full licence applications. |
| | 38. Section 9.6.94 of the draft chapter correctly identifies that GCN can be impacted by temporary habitat severance and fragmentation. We welcome possible dispersal corridors through exclusion area to aid dispersal. However, no detail is provided. The specific impact of habitat fragmentation cannot be accurately assessed as no specific modelling has been carried out and the detail of possible corridors has not been confirmed. As such, the National grid should commit to providing a corridor to an agreed specification where certain thresholds. NRW would welcome further discussion regarding the potential triggers for such mitigation. | | The specification and proposals are provided in the BMS (Document 7.7); full details will be included in the EPS GCN licence application following further discussions with NRW, |
| | 39. NRW note that there is no reference to current and favourable conservation status for the species this should be given consideration in the ES. | | Reference has now been made to the favourable conservation status species where appropriate. |
| Red Squirrel | | | |
| Appendix 9.12 | 42. The presence of Red squirrel is confirmed in Section A. | | Red squirrel has been confirmed outside of the Order Limits in Section A. |
| | 43. Potential dreys were recorded in all section of the scheme. However the absence of sightings or field signs indicates low levels of activity within the order limits. | | Noted |
| | 44. NRW consider that the red squirrel survey and assessment to be satisfactory for the purposes of informing the planning decision making process. | | Noted. |
| Assessment 5.9 | 46. Table 9.20: NRW agree with the assessment of potential effects during different stages of the project on Red Squirrel | | Noted |
| | 47. NRW has no objection to the proposed approach to mitigation. We concur with the overall impact assessment on this species. | | Noted. |
| Ornithology | | | |

| Table 3: Natural Resources Wales Comments | | | |
|---|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| Appendix 9.15 | 50. Table 3.1, page 11, Reference is made to breeding common tern. For completeness we recommend that breeding records for common tern are checked with JNCCs Seabird Monitoring Programme http://jncc.defra.gov.uk/smp/ . | | This check has been made. The ecology chapter 5.9, Ecology and Nature Conservation (Document 5.9) and associated Appendix 9.15 Ornithological Assessment Report (Document 5.9.2.15) have been updated with this information where relevant. |
| | 51. Vantage Point Survey Methods - NRW seek clarity on whether any VP watches within close proximity to each other were undertaken simultaneously, or if dates were staggered. if undertaken simultaneously, this may result in alteration in minor alterations to flight behaviour of a given species which should be accounted for. | | This has been checked and can be found in Appendix 9.15 Ornithological Assessment Report (Document 5.9.2.15). |
| | 52. 3.3.11, page 16, presents 5 flight height bands ranging from 0-10m to >70m. NRW require clarification as to how the height was estimated in these bands. A small diagram with a pylon and the different heights indicated may show this more clearly | | <p>This is referred to in the ecology chapter 5.9, Ecology and Nature Conservation (Document 5.9) and Appendix 9.15 Ornithological Assessment Report (Document 5.9.2.15) but can be found as per below.</p> <p>The pylon dimensions and heights for a typical lattice pylon are illustrated on Design Plan DCO_DE/PS/08 sheet 4 of 4 (Document 4.13) and the indicative overhead line profiles are illustrated on Design Plans DCO_DE/PS/03 Sheets 1 to 12, DCO_DE/PS/04 Sheets 1 to 12 and DCO_DE/PS/05 Sheets 1 to 6 (Document 4.13).</p> |
| | 53. 3.3.41, page 31, There is particular emphasis on breeding peregrine but very little consideration to breeding hobby. NRW's current opinion is that the methodology presented is not adequate for Hobby. The text here should give further clarification of the specific considerations that were give to Hobby. | | <p>The potential presence of breeding hobby was considered throughout the Order Limits. Hobby can be very secretive during the initial period when nesting (late April until mid-June) but is readily observed whilst hunting and therefore Vantage Point survey is recommended as the first step in identifying potential home ranges. Some surveys should be undertaken at dawn and dusk when hobby is likely to be most active between the period of May and September particularly in areas of good foraging habitat. Home ranges vary with regular foraging taking place up to 6km from the nest (Chapman, 1999; Sergio et al., 2001). In Britain home ranges may overlap extensively with an exclusive area of up to 500m defended but foraging areas shared.</p> <p>Vantage Point surveys were completed along the whole route over two seasons and recorded only three hobbies. In addition, data provided by local groups showed that they were not breeding</p> |

| Table 3: Natural Resources Wales Comments | | | |
|---|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | on Anglesey. Hobby were therefore judged to be absent from the area as a breeding species. Full details can found in the ecology chapter 5.9 Ecology and Nature Conservation (Document 5.9) and Appendix 9.15 Ornithological Assessment Report (Document 5.9.2.15). |
| | 54. 4.2.10 (page 53) Supporting text is required to outline that over the last 5 years the locations of wintering Green and White Fronted Geese are relatively unknown on Anglesey, particularly flight lines between roost and foraging areas. Apart for the VPs there seems to have been no geese specific surveys. | | Records provided by RSPB showed Greenland White-fronted Geese present on Maltreath Marsh. This has been clarified in the ecology chapter 5.9, Ecology and Nature Conservation (Document 5.9) and Appendix 9.15 Ornithological Assessment Report (Document 5.9.2.15). There were no goose specific surveys as there are no geese present within the Order Limits, a fact that is backed up by Vantage Point surveys and records. |
| Assessment 5.9 | 56. It is not clear whether the use of reflective markers on the lines has been adequately considered where sensitive receptors have been identified in sensitive areas (within the collision risk band). NRW would request clarification of whether this has been considered, for what species and any reasoning if screened out as a potential mitigation option. | | Reflective markers were not considered as no likely significant effects were identified. Further comment has been included in the ES Chapter 5.9, Ecology and Nature Conservation (Document 5.9). |
| | 57. With regard to schedule 1 species and features of protected sites, text is often included referring to the height flight were recorded (<10, 10-70 and >70). This is occasionally referenced as numbers of individuals, sometimes as a percentage. NRW would recommend this data is represented in the same way for each species. The recommendation would be for a small table for each species showing the flight heights (or at risk/not) against the numbers of individuals and the percentage that represents. Even where this data is presented currently, there appears to be limited use of the data in drawing conclusions and proposing mitigation. NRW would request this is reviewed. | | Information has been presented in tabular format for each species and referred to in the assessment within ES Chapter 5.9, Ecology and Nature Conservation (Document 5.9) and Appendix 9.15 Ornithological Assessment Report (Document 5.9.2.15). |
| | 58. 9.7.2 (page 324) Whooper swan, it is stated 'The majority of the recorded flight activity Included some time at a height that risked collision with the proposed infrastructure.' the ES should include further information (as indicated above) on the recorded heights of all whooper swan flights between Llyn Alaw and the foraging field(s) as well as an assessment of the implications of this collected data. | | As previous response, information has been presented in tabular format for each species and referred to in the assessment within ES Chapter 5.9, Ecology and Nature Conservation (Document 5.9) and Appendix 9.15 Ornithological Assessment Report (Document 5.9.2.15). |
| | 59. 9.7.3 (page 325), states 'The sensitivity of whooper swan to collision is moderate.' NRW do not agree with the sensitivity ranking for whooper swan and the developer should provide further evidence of the moderate assertion. | | The level of sensitivity also takes into account of level of activity as Whooper swan will be less sensitive to collision with power lines in areas where there is a lower level of activity, and more |

| Table 3: Natural Resources Wales Comments | | | |
|---|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | sensitive where there is more significant activity. This has been clarified in the text. |
| | 60. NRW considers the mitigation for Whooper to be inadequate / vague. The measures detailed in the CEMP are general in nature and not specific to the species. The proposed phasing of work does not commit the national grid to avoiding this timeframe (September – April), and it is unclear what benefit any temporary exclusion zones would be without further detail and justification within the ES text. | | More details have been provided about the watching brief in the ES Chapter 5.9, Ecology and Nature Conservation (Document 5.9), but further information can be found within the BMS (Document 7.7). |
| | 61. NRW would require clarification whether the installation of line markers on earth wires and/or conductors has been considered to reduce any potential collision (or whether mitigation by design reduces the need for specific markers) and | | As per previous response, reflective markers were not considered as no likely significant effects were identified. Further comment has been included in the ecology chapter 5.9, Ecology and Nature Conservation (Document 5.9). |
| Protected Sites | | | |
| | 63. The construction compound at SH482751 is in an area which may have significant Himalayan balsam, spreading down the stream which flows from Caeau Talwrn SSSI. An intensive programme of balsam control should be executed in order to prevent balsam from being spread to new locations along the powerline. From this compound the route northwards passes through an area with abundant balsam. The potential for movement of INNS along the construction route must be given appropriate weight and avoidance and mitigation measures detailed within the HRA. | | Currently this species remains outside of the Order Limits at the location of the compound, but there are areas within the Order Limits where it is present to the south of the compound. The stream flowing from Caeau Talwrn SSSI does not pass through the compound itself, but to the north of it; however it does cross the Order Limits for the OHL but no stands have been record here to date. Stands within the Order Limits will be treated/controlled and monitoring and biosecurity measures will be in place to limit potential for spread of this species. Further information can be found within the CEMP (Document 7.4) and the BMS (Document 7.7). |
| No Significant Effects Report [now the Habitat Regulations Assessment Report] | | | |

| Table 3: Natural Resources Wales Comments | | | |
|---|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | 65. NRW flag that the 'site column' in many of the tables in this section should be clearer as it currently refers to a number of sites in the one row. This reduces clarity on which site and feature is being affected/or not. | | Noted, the layout of the tables have been reviewed and made clearer. |
| | 67. Table 6.1 Page 140, Introduction of INNS during operation- NRW consider that there is potential for effects as INNS may be introduced during routine maintenance visits on boots, tyres, etc. as such NRW consider that there is a potential for an effect here (change from N to Y). Simple biosecurity protocol including cleaning boost can be introduced to minimise any risk during operation. This should be reflected in 6.3.7 summary. | | The table has been adapted to be able to specify this measure for maintenance. |
| | 69. Table 6.2 Page 149 In what appear to be introductory sentences (the first paragraph), it doesn't seem to be the correct location to screen out effects (no hydrological linkages to a site). NRW would recommend the table is altered to ensure clarity (this could be achieved by screening out a pathway as the next row in the table). | | This has been amended. |
| | 70. Page 153 Surface and ground waters are combined as an issue. NRW would recommend it would be clearer to split these topics (throughout the document) as the measures required to regulate any potential changes will be different. | | This has been amended and clarified as requested. |
| | 71. Page 156 Conclusion regarding Invasive Non Native Species (INNS) is correct providing there are no plans to use any kind of safety boat, drilling rig or other equipment in the Strait moving forward. However, if vessels are required, this should be re-assessed | | INNS measures relating to this are referred to/included within the BMS (Document 7.7) and CEMP (Document 7.4). |
| | 72. Page 167 NRW consider the main likely pathway for marine mammals to be vibration/noise. This is screened out relying on two 'likely' statements (likely that noise/vibration would not be too great, and likely that the species would avoid the area). NRW would not consider this to be a sufficiently robust assessment to screen this receptor out and would request more robust approach to determining the noise/vibration likely to be experienced in the water column, and as a result the extent of the area of concern (if any). The es text should detail how this conclusion was reached. Note this has been requested previously with regard to the CEMP and fish species in the response to Batch 2 documents. | | Following discussions with NRW, additional information is provided in what is now the Habitat Regulations Assessment Report (Document 5.23). |
| | 74 Table 6.4 There are repeated references to temporary introduction of INNS. Such introductions are seldom temporary as any introduction may not be immediately apparent, or may spread from the order limits prior to being discovered/managed. The matrix and | | The word temporary has been removed. |

| Table 3: Natural Resources Wales Comments | | | |
|---|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | screening assessment should be amended accordingly to reflect that this is not temporary. | | |
| | 75. Page 254 Text referring to specific drainage area 5 Maps should reference the specific chapters where these plans are held (and these should be a sufficient resolution to assess detail). Such references should be added throughout the table where required. | | References have been added throughout the table. |
| | 76. Page 293 Alkaline fens- Fen meadow with Juncus subnodulosus is also present beyond the site boundary immediately north of Caeau Talwrn SSSI in an area where a pylon is proposed. This should be regarded as supporting habitat for the SAC since any loss of this scarce habitat may lead to loss of connectivity which should be assessed. This should also be considered in Page 363. | | Species, as interest features of the SAC, are considered within the HRA in terms of associated supporting habitat. |
| | 78. Page 369 first para in 3rd column Table 7.1 is unclear (as generally flagged at the start of this section). NRW assume it refers to Cors Erddreiniog but as the site is the whole SAC and RAMSAR this needs clarification. | | The table has been amended to make it clear what component of the SAC is being referred to. |
| | 79. Page 373 There is no mention of Azolla filiculoides although it may be encountered. This should be added to the text. | | This species is now included in CEMP measures BS81-BS83 (Document 7.4) which is secured by Requirement 6 of the draft DCO (Document 2.1). It is referenced within the HRA Report (Document 5.23). |
| Ecology and Nature Conservation | | | |
| | 81. Page 9-32 refers to Phase 1 survey undertaken from late September to end of November 2015. The area of M22 fen meadow north of Caeau Talwrn was mapped simply as marshy grassland with no target note or recognition of the scarcity of this habitat, possibly due to the time of year. This should be reviewed in the ES. | | <p>The ecology chapter refers to the Appendix 9.3 Phase 1 Habitat Report (Document 5.9.2.3) which details when Phase 1 habitat surveys were conducted ‘<i>The initial Phase 1 Habitat survey commenced at the end of September 2015 and continued through October until mid-November 2015. The survey was continued during 2016 and 2017. The Phase 1 Habitat survey was groundtruthed in 2017 where access was available.</i>’</p> <p>Marshy grassland is technically a correct habitat within the Phase 1 habitat methodology for fen meadow. This area was picked up within the NVC surveys and therefore was not required to be target noted in the Phase 1 mapping. Further surveys have been</p> |

| Table 3: Natural Resources Wales Comments | | | |
|---|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | conducted to establish the presence and extents of any M22 fen meadow habitat within this area. |
| | 82. Page 9-73 Tre'r Gof includes an area of calcareous fen dominated by <i>Cladium mariscus</i> , an Annex 1 habitat. This Habitat should be referenced in this section. | | This table only includes a summary of the citation for this SSSI, and refers out to Appendix 9.2 Designated Sites Information (Document 5.9.2.2) which includes the more detailed citation. Both now include this reference. |
| | 83. Page 9-83, Table 9.14, Fen meadow should have been identified in surveys and listed here. | | Areas of fen have been covered under the term 'valley mire'. Fen is the overarching term (E3 in Phase 1 handbook ⁵) which covers the various different types of mire. National Grid has been more specific and identified it as valley mire (E3.1). |
| | 84. Page 9-155 Temporary disturbance at Tre'r Gof must be assessed alongside all the other disturbance likely to affect this site. | | Temporary disturbance is included for this site. |
| | 86. Page 9-215 The commitment to agree drainage design with NRW is welcomed. NRW would reiterate that it may be desirable to retain some mitigation features following construction to protect the fen SAC. We welcome further discussions with the developer regarding this as the project progresses. | | Noted |
| | 87. Location of stockpiles near designated sites must consider possible risks to the adjacent sites. | | Noted and the CEMP (Document 7.4) has been amended to include this. |
| | 88. Page 9-218 Strimming balsam will have to be repeated (potentially several times in one season) to prevent flowering on regrowth. | | Wording in this table and the CEMP (Document 7.4) has been updated. |
| | 89. 9-221 BNC 22 NRW request that this should also specify no storage of equipment. | | The wording has been updated accordingly. |

⁵ JNCC (2010) Handbook for Phase 1 habitat survey - a technique for environmental audit

| Table 3: Natural Resources Wales Comments | | | |
|---|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | 90. Page 9-236, 9.3.40 NRW would recommend this is re-worded to provide clarity- are the two pylons 'up-gradient' not in the surface water catchment? Also any detail which is available on the two permitted discharges would provide further clarity. | | The wording has been amended to provide additional clarity. |
| | 91. Page 280, 9-5-14, NRW would recommend reference to M22 here. | | The habitat M22 is now referenced within this section where appropriate. |
| | 92. Page 9-394 Table 9.23 Potential shared receptors omits fen and fen meadow and marshy grassland habitats, these habitats should be included. | | In terms of shared receptors, marshy grassland is included within grasslands. Other habitats are included under the assessment for designated sites such as Tre'r Gof SSSI. |
| | 93. 10.3.16 It is essential that the powerline project does not reduce the benefits of the work at Caeau Talwrn Wylfa Newydd development referenced in this paragraph. This will require updating once the Wylfa ES is finalised and should be fully assessed and quantified, with any negative effect on the areas being further mitigated as appropriate. | | Habitats present within the proposed Horizon SSSI area at Cae Canol-dydd (pylon 4AP062) are assessed within sections commencing 9.4.45 and 9.4.154 as appropriate. |
| Flood Risk: | | | |
| | 2. As a general note, NRW has had a number of meetings, skype meetings and numerous correspondence over the years to discuss and agree how flood risk should be considered for this project. The batch 4 documents would be acceptable in terms of the general approach taken on flood risk and we would be satisfied for the DCO to be considered with these as supporting documents. We have provided detailed comments below on each section | | Noted |
| 3. 01_5.19_5.19 Chapter 19 Intra Project Effects | 4. Flood risk is screened out on Pg 7. NRW agree with this assessment. | | Noted |
| 5. 01_5.20_5.20 Chapter 20 Inter-Project Cumulative Effects | 6. While large parts of this document are not complete, pages 18- 40 currently screen issues/projects in/out. With regard to flood risk, NRW are satisfied with the assessment to date. | | Noted |

| Table 3: Natural Resources Wales Comments | | | |
|---|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| 7. 01_5.21_5.21 Chapter 21 Combined Effects with Wider Works (Pentir to Trawsfynydd connection) | 8. The chapter describes the work involved in up grading the link between Trawsfynydd and Pentir and it includes an assessment of combined effect. The section relevant to flood risk is Pg24. NRW agree with the assessment with regard to flood risk. | | Noted |
| 9. 01_5.28_5.28 Schedule of Mitigation | 10. NRW support the text used as Control and Management Measures & Mitigation measures with regard to flood risk as detailed in table 7. | | Noted |
| Hydrology | | | |
| 12. Appendix 12.1 Overarching FCA: | 13. NRW is generally satisfied with this document, but would suggest the following points are considered: | | Noted |
| | 14. 2.4.2. NRW would request an additional sentence for clarity is added "... These maps are usually based on fluvial catchments which are greater than 3km2 in area.". This is also applicable to table 3.7 (1-4 2nd para.) | | This sentence has been added to paragraph 2.4.2. No changes have been made to Table 3.7, where the catchment area minimum is already mentioned. |
| | 15. 2.5.10 to 2.5.13. As of 2nd February 2018, Welsh Government has revised its guidance on Adapting to Climate Change: 16. Http://gov.wales/topics/environmentcountryside/epq/flooding/nationalstrategy/guidance/climateguide/?skip=1&lang=en 17. The ES must appropriately reference and consider this. | | The revised guidance has been accounted for throughout the FCA (Document 5.12.2.1-4) as appropriate. |
| | 18. Tables 3.1, 3.2, 3.3 and 3.4. We note the responses provided in these tables and can advise that these are adequate and acceptable responses. | | Noted |
| | 19. Table 3.7. With regards to the responses provided in the 9th paragraph we do have some concerns regarding the use of 'considered' in the response. We would prefer that 'adhered/followed' should be used or that the National Grid state that additional mitigation/management measures would be included. | | The text in Table 3.7 of the FCA Volume 1 (Document 5.12.2.1) has been revised. Periods of high flow could likely occur during the summer months, i.e. would not be avoided by this constraint. Conversely, periods of low flow could occur between October-April but would not be able to be taken advantage of. As such, |

| Table 3: Natural Resources Wales Comments | | | |
|--|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | the wording has been revised to include a case by case consideration of seasonal restrictions, particularly taking account of fish spawning requirements and measures included within the Biodiversity Mitigation Strategy (Document 7.7). |
| 20. Appendix 12.2 Pentir Substation Extension FCA: | 21. NRW has no detailed comments to make regarding this FCA. We would however question as to why the whole route plans are included since this FCA relates to the Pentir substation alone. | | Pentir substation is shown within those plans: references have been added to the relevant sheet (Sheet 6 of Documents 5.12.1.10, 5.12.1.11 and 5.12.1.12). |
| 22. Appendix 12.3 THHCSEC FCA: | 23. NRW is generally satisfied with this assessment but would request clarification regarding Table 1.1 which shows the estimated dewatering rates at the tunnel head houses. Should the dewatering rate during operation not be 0.02l/s for Ty Fodol? | | The dewatering rates have been updated and unit conversions corrected. The rates are presented in Document 5.4 and Document 5.12.2.3A . |
| 24. Appendix 12.4 Overhead Line FCA: | 25. NRW is satisfied with the contents of this document. | | Noted |
| Water Framework Directive Assessment | | | |
| | 27. Page 12-4 Table 1.1. Lakes do not have fish assessed as biological element as there is no standard method available for assessing this yet. The reference to fish under the biological column for lakes should be removed. | | Reference to fish has been removed from Table 1.1 of the WFD Assessment (Document 5.12.2.5). |
| | 28. Page 12-17 Table 2.3. We advised in our comments on 8 Sept 2017 (review of the draft WFD assessment (Table 2.3 item 3) that we would provide further clarification on the status of small non-reportable water bodies in due course. The response is detailed below in paragraph 29-32. | | See below. |
| | 29. NRW has recently revised an internal WFD guidance note regarding non- reportable water bodies, the relevant considerations with regard to this project is section 3.1: 30. "Some stretches of water are too small to be a formal WFD water body, or are too small to show up on a map of the water body such as reens, ditches, streams or brackish lagoons. These are still legally protected from pollution, modification and abstraction and | | Changes had been made to recognise that non-reportable WFD water bodies are assessed in the same way as reportable water bodies. In addition to those earlier changes, paragraph 4.2.2 has been updated to indicate that non-reportable water bodies should be treated as being at good status. |

| Table 3: Natural Resources Wales Comments | | | |
|---|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | where an environmental issue is identified, it can still be improved where local actions and assessments deem it a priority. Where a new activity or project is planned then assessment and licensing should be made to protect, and where necessary improve them to the extent needed to achieve the Directive's objectives for water bodies to which they are directly or indirectly connected. | | |
| | 31. It is likely that these stretches of water are not monitored by NRW and their status will not be reported. In the absence of any classification it should be assumed that they are at 'good' status and any deterioration from 'good status' be assessed as a result of a new activity." | | |
| | 32. NRW has also attached a copy of guidance OGN72 on WFD compliance assessment. This must not be distributed further without NRW's authorisation. | | See above. |
| | 33. Page 12-17/12-18 Table 2.3. National Grid response to NRW comment on Table 6.8 - "The Caeau Talwrn SSSI does not form part of the Anglesey Fens SAC site boundary and is, therefore, not a component of the SAC." 34. For clarification, parts of the SSSI do form components of the site, others do not. This should be accurately reflected in the ES. | | It is acknowledged that part of Caeau Talwrn SSSI is a component of the SAC. However as the Proposed Development does not require the mitigation that the original comment referred to, the response has been updated to reflect this. |
| | 35. Page 12-54, section 5.6.4. Amendment is required to current bathing water status as stated in this document: http://environment.data.gov.uk/wales/bathing-waters/profiles/profile.html?site=uk11100-40050 36. The Cemaes Bay bathing water is currently as assessed as "Poor" and not "sufficient" 37. Traeth Lligwy is currently assessed as excellent and not "good " | | The bathing water statuses have been updated in Chapter 12 (Document 5.12) and the WFD Assessment (Document 5.12.2.5). |
| | 38. Page 97, 7.4. Any conclusion on in-combination effects must be assessed upon completion of chapters 19, 20 and 21. | | The conclusion regarding cumulative effects in the WFD Assessment (Document 5.12.2.5) is consistent with the findings of the Environmental Statement (Volume 5). |
| Fish | 40. NRW is satisfied with the WFD assessment with regard to fish providing the point detailed below can be appropriately addressed by the developer. | | Noted |
| | 41. Ecology and Nature Conservation Document 5.9: Page 321, table 9.6.154. This table appears to refer to a field survey to identify only breeding habitats for fish species. This is not sufficient as some fish species like eels will not have breeding habitats in the river. | | Pre-construction surveys will include for habitat requirements for all life stages of fish present. All main rivers will be crossed using clear span bridges, as will the majority of their tributaries. |

| Table 3: Natural Resources Wales Comments | | | |
|---|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | While NRW acknowledges that some areas will present a lower risk, this initially needs to include surveys to identify all habitat requirements for all life stages of fish present. The Nation grid will then subsequently be detailing any site specific reasons not to undertake detailed survey/ categorise the area as a lower risk. This will ensure that these various habitats are not adversely affected by habitat fragmentation. | | Surveys will in particular focus on those tributaries which could be crossed using a culvert and therefore could affect potential fish habitat if present. |
| | 42. When the national grid comes to forming new / replacement crossings, it would better for structures to be clear span, or an oversized culvert, with invert sunk below bed level. Any these methods will have to be qualified by the national grid at the time for the specific site conditions. | | These requirements are part of the measures set out in the CEMP (Document 7.4). |
| Air Quality | | | |
| Table 14.74 (Section C Llandyfrydog) | 96. The table indicates that the NO _x , SO ₂ , N-dep and acid deposition are each about 0.1% of the relevant critical levels and critical loads at each location on Corsydd Mon SAC. That is acceptable alone, but there is a need to consider in combination as referenced below. | | <p>The assessment of air quality impacts has been updated since the submission of the of the draft documents in late 2017 and early 2018.</p> <p>Corsydd Mon SAC is considered in the AQ assessment for point source emissions only (Table 14.66), where sections of the SAC are located within 10km of the emergency generators at Braint.</p> <p>Sections of the Corsydd Mon SAC are located adjacent to the Proposed Development's access road (at a location that is more than 10km away from the emergency generators). However, project vehicle flows on the access road at this point are less than 100 2-way HGV movements per average day, which is below the criteria agreed during the scoping stage to warrant a quantitative assessment of emissions at this location. Furthermore, no non-project related vehicles will be using the access track and there is no potential for in-combination (cumulative) effects.</p> |
| Table 14.77 (Section D Talwrn to Ceint) | 98. This table shows that for SO ₂ , N-dep and acid dep the contributions are all below 1% of the relevant critical levels and loads. Table 14.77 does indicate that at Malltraeth Marsh (Cors Ddyga) the NO _x contributions on the A55 with background (the PEC) for up to a distance of 45m from the road will exceed 70% of the NO _x critical level. | | <p>The assessment of air quality impacts has been updated since the submission of the draft documents in late 2017 and early 2018. This included the use of updated traffic data for the future years considered and an update to the model verification exercise, based on a full 12 month NO₂ diffusion tube dataset.</p> |

| Table 3: Natural Resources Wales Comments | | | |
|---|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | Proposed development impacts on the Malltraeth Marsh (Cors Ddyga) SSSI are given in Table 14.69. The NO _x contribution accounts for less than 1% of the Critical Level for this pollutant. Impacts are therefore screened as insignificant. |
| | 99. This is confirmed in para 9.2.37 (p144) but there is no narrative on what is then required moving forward. As it is construction phase the increase in NO _x up to a distance of 45m into Malltraeth could be considered temporary but will this drop on the A55 after construction so that the PEC is below 70% of the NO _x critical level? NRW require clarification of what the text is trying to convey regarding the impacts at Malltraeth Marsh SSSI and any potential effects. | | Proposed development impacts on the Malltraeth Marsh (Cors Ddyga) SSSI are given in Table 14.69. The NO _x contribution accounts for less than 1% of the Critical Level for this pollutant. Impacts are therefore screened as insignificant. |
| Table 14.89 (Section F Afon Baint to Pentir) | 101. Paragraph 9.2.56 states that Table 14.89 includes the construction phase contributions but the heading of Table 14.89 say it is existing baseline. The process contributions to Coedydd Afon Menai require consideration. To the north west section the contributions are all above 1% up to 100m into the SSSI. To the south west it is above 1% up to 50m into the SSSI. | | Table headings corrected. The process contribution at Coedydd Afon Menai SSSI is provided in Table 14.80. The assessment of air quality impacts has been updated since the submission of the draft documents in late 2017 and early 2018. This included the use of updated traffic data for the future years considered and an update to the model verification exercise, based on a full 12 month NO ₂ diffusion tube dataset. The updated assessment also took into account the elevated nature of the A55 as it passes adjacent to the Coedydd Afon Menai SSSI. The NO _x process contribution accounts for less than 1% of the Critical Level for this pollutant at all transect locations considered at the SSSI. Impacts are therefore screened as insignificant. |
| | 102. In para 9.6.3 (see p183) it is stated that the site would expect exceedances to an additional 5m away from the road. The developer must clarify whether they are stating that the limited increases in exceedance are only to a distance of 5m into the SSSI or is it an | | The assessment of air quality impacts has been updated since the submission of the draft documents in late 2017 and early 2018. This included the use of updated traffic data for the future years |

| Table 3: Natural Resources Wales Comments | | | |
|---|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | additional 5m to where they predict 1% will be reached (i.e. 45m south western section of SSSI and 150m in the north eastern section). The developer must clarify this point. | | considered and an update to the model verification exercise, based on a full 12 month NO ₂ diffusion tube dataset. The updated assessment also took into account the elevated nature of the A55 as it passes adjacent to the Coedydd Afon Menai SSSI. The NO _x process contribution accounts for less than 1% of the Critical Level for this pollutant at all transect locations considered at the SSSI. Impacts are therefore screened as insignificant. |
| | 103. Para 9.3.49 bullet 2 (p9-327) it is then stated the developer used 5 – 15 as the nitrogen critical load because of the "...limestone pavement, scree and botanically diverse coniferous woodland..." but this is incorrect as there are no coniferous woodlands in the citation (broadleaved woodland and the whitebeams). The database also mentions chalk and soft rock. But in Table 14.89 it is stated that 10 – 20kgN/ha/yr has been used. NRW would request that it is clarified which value has been used and that the text and assessment is updated accordingly. | | In the draft assessment, a Critical Load range of 5-15 kg N/ha/yr was used as the most conservative Critical Load range given by APIS for this location. The updated assessment uses a Critical Load range of 10-20 kg N/ha/yr (Lowland Mixed Deciduous Woodland), following further consultation with project ecologists. |
| | 104. Para 10.3.8 indicate cumulative impacts are temporary at Coedydd Afon Menai this is acceptable, but the in-combination issue must also be addressed. | | In combination (cumulative) effects are considered in Section 10. |
| In combination: | 106. Due to the Wealden judgement the National Grid needs to demonstrate that they have looked at and considered other plans and projects even though the emissions / contributions from this development may be 1% or below. From the information presented in this batch, NRW understands this has been undertaken because in 10.2 Intra project cumulative effects and 10.3 Inter project cumulative effects (p9-392) assesses other plans / projects in the same way as in combination – The National grid should clarify whether this has been done. | | In combination (cumulative) effects are considered in Section 10. This considers impacts at ecological sites located adjacent to the A5025 (Beddmanarch-Cymyran SSSI) and A55 (Cors Ddyga SSSI and Coedydd Afon Menai SSSI), where in combination (cumulative) effects could occur, mainly as a result of shared impacts with the Wylfa Newydd development construction traffic emissions. |
| | 107. Page 9-467, Table 9.25, it is indicated that potential AQ effects and the mitigation proposed (in relevant docs) to avoid significance or at least reduce it. It is stated that the developer is committed to the mitigation measures identified in AQ Ch14 (Doc 5.14 i.e. Table 14.111, p187) which effectively says that at Coedydd Afon Menai the nitrogen critical load and NO _x critical levels are already exceeding but due to the temporary nature | | The assessment of air quality impacts has been updated since the submission of the draft documents in late 2017 and early 2018. This included the use of updated traffic data for the future years considered and an update to the model verification exercise, based on a full 12 month NO ₂ diffusion tube dataset. |

| Table 3: Natural Resources Wales Comments | | | |
|--|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | of the impacts there is no need for mitigation. NRW require clarification regarding this point – has an impact been identified which requires mitigation, or is there no need for mitigation? | | <p>The updated assessment also took into account the elevated nature of the A55 as it passes adjacent to the Coedydd Afon Menai SSSI.</p> <p>The NO_x process contribution accounts for less than 1% of the Critical Level for this pollutant at all transect locations considered at the SSSI.</p> <p>Impacts are therefore screened as insignificant. No mitigation is therefore proposed.</p> |
| | 108. NRW note Table 14.63 heading is likely incorrect as para 7.8.17 says that it is the future baseline conditions. | | Corrected in the updated chapter. |
| | 109. NRW will provide further comment on in-combination effects when the appropriate draft chapters are shared for comment. | | Noted. |
| 44. 5.20 ES Chapter 20 – Inter-Project Cumulative Effects: | 45. NRW has highlighted several points for clarification during the Batch 3 consultation. Any amendments to previous chapters should update the assessment in this section. | | Noted. |
| 5.21 ES Chapter 21 – Statement of Combined Effects with the Wider Works: | 47. Table 21.8. Assessment of Combined Effects -The developer states that the slight increase in traffic on A478 due to the Glaslyn Cables is not going to have an in-combination effect. This should be supported by evidence- such as showing the change in traffic volume does not trigger the significance threshold using the relevant traffic significance guidance (that could be the DMRB or other recognised guidance). Similarly, evidence should be provided for operational phases to give clarity. If this assessment has been undertaken, the relevant chapter should be referenced. | | <p>In combination (cumulative) traffic data is screened in Table 14.82.</p> <p>Operational phase air quality impacts are referred to in paragraph 1.1.3.</p> |
| Geoscience | | | |
| | 111. Table 11.4 RAMSAR sites and SSSIs are not just supported by principal aquifers; they can be supported by any of the aquifer types | | This has been updated accordingly and is now reflected in within ES Chapter 11 Geology Hydrogeology and Ground Conditions (Document 5.11) Section 7 Baseline Conditions and considered under Section 9 Mitigation and Residual Effects. |

| Table 3: Natural Resources Wales Comments | | | |
|---|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | 112. Table 11.6 Following this point through, if the sensitivity of a resource is "medium" according to Table 11.4, (all secondary aquifers and GWDTEs not supported by a principal aquifer), and the magnitude "high" (change to aquifer or partial loss of GWDTE integrity), this would be "insignificant". We do not consider either of these examples are automatically insignificant because there could be implications for water supply, baseflow and on designated sites. As such, this must be reviewed. | | The impacts of the Proposed Development upon identified GWDTEs and aquifers is considered in ES Chapter 11 Geology Hydrogeology and Ground Conditions (Document 5.11) under section 9.6 Effects on Groundwater |
| | 113. Table 11.16 Please note that the glacial till is no longer classified as 'unproductive strata'. The glacial till deposits were redefined as 'secondary (undifferentiated)' aquifers in recognition of their importance in maintaining local water supplies and baseflow to wetlands, lakes and rivers ('New GW vulnerability mapping methodology', Environment Agency 2014) | | This has been updated accordingly and is now reflected in within ES Chapter 11 Geology Hydrogeology and Ground Conditions (Document 5.11) Section 7 Baseline Conditions and considered under Section 9 Mitigation and Residual Effects. |
| | 114. Page 112, 9.6.1, Dewatering causing reduction in flows to GWDTEs should be specifically included in this list (although we note that they are considered individually in the subsequent sections). There may also be a need to consider change in recharge chemistry to GWDTEs from the development, in particular placement of compositionally different excavated material (not just introduction of contamination). Has the potential for non-temporary saline intrusion from tunnelling (Table 11.24) been scoped out? This is not clear from the information provided. | | This effect is specifically considered in ES Chapter 11 Geology Hydrogeology and Ground Conditions (Document 5.11) under Section 9.6 The impacts of the Proposed Development upon identified GWDTEs is considered under section 9.6 Effects on Groundwater |
| | 115. 9.6.16 the National Grid is suggesting that water levels could be drawn down by about 3.5 m in close proximity to Cors Eddreiniog for 3 to 6 days and that the significance of this would be negligible. NRW agrees in principle however would require that the water is treated appropriately and discharged to the same catchment to avoid any net loss. | | The discharge of treated groundwater to soakaway within the same catchment (Cors Eddreiniog) is discussed in ES Chapter 11 Geology Hydrogeology and Ground Conditions (Document 5.11) under Section 9.6 Effects on Groundwater. |
| | 116. 9.6.17 See comment above about designation of glacial deposits. These are highly variable and can support supplies, wetlands etc..., so currently, NRW would not currently agree with the statement in this paragraph. This may need to be carried through into subsequent sections. | | Dewatering associated with construction of the tunnel and associated shafts has incorporated the updated designation of Glacial Deposits, ground investigation information and is considered in ES Chapter 11 Geology Hydrogeology and Ground Conditions (Document 5.11) under Section 9.6 Effects on Groundwater and Appendix 11.8 (Document 5.11.2.18) |
| | 117. Table 11.27 Comments above may mean that the cumulative effects on groundwater, in particular with respect to GWDTEs, may need to be re-looked at. | | The impacts of the Proposed Development upon identified GWDTEs and aquifers is considered in ES Chapter 11 Geology |

| Table 3: Natural Resources Wales Comments | | | |
|---|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | Hydrogeology and Ground Conditions (Document 5.11) under section 9.6 Effects on Groundwater |
| Schedule of Mitigation | | | |
| Schedule of Mitigation | <p>56. Page 170, Table 4, The table states for collision effects, 'no mitigation is required for collision risk'. NRW disagree that the need mitigation for collision effects can be screened out without further qualification, and have already queried the mitigation proposed by the national grid for this species in Batch 3 comments. NRW note, birds, particularly geese and swans may fly into power lines accidentally, either because they do not see them at all, or because they see them too late to react; this is a particular issue for large species that cannot change direction quickly. Increasing power line visibility by marking them is therefore frequently proposed as a way of reducing collision-induced mortalities in high risk areas. Studies have found marking power lines led to significant reductions in collision rates or dangerous flight behaviour (i.e. approaching close to power lines) in cranes <i>Grus</i> spp., and swans <i>Cygnus</i> spp (Williams et Al. 2017). A study in England also showed the use of flight diverters reduced mute swan collision with power lines (Frost, 2008). NRW will require further information as detailed in our Batch 3 response to further assess the adequacy of the mitigation proposed for this species.</p> <p>Williams, D.R., Child, M.F., Dicks, L.V., Ockendon, N., Pople, R.G., Showler, D.A., Walsh, J.C., zu Ermgassen, E.K.H.J. & Sutherland, W.J. (2017) Bird Conservation. Pages 95-244 in: W.J. Sutherland, L.V. Dicks, N. Ockendon & R.K. Smith (eds) What Works in Conservation 2017. Open Book Publishers, Cambridge, UK</p> <p>Frost, D. 2008. The use of 'flight diverters' reduces mute swan <i>Cygnus olor</i> collision with power lines at Abberton Reservoir, Essex, England. Conservation Evidence 5, 83-91.</p> | | As per previous response, reflective markers were not considered necessary as no likely significant effects were identified. Further comment has been included in the ecology chapter 5.9, Ecology and Nature Conservation (Document 5.9). |
| | <p>57. Pages 176 -178. The risk of electrocution has not been separately referenced in this document or the ES in detail. Ecology and Nature Conservation 5.9, Table 9.2 list this as a potential pathway for effect and the National Grid states that is considered in the ES and references sections and other chapters where this consideration has been given. However, in further following these referenced location, NRW cannot find further detailed qualification of how this has been considered. The National Grid should reference this further in the ES detailing the reasons for not giving specific reference to this pathway if it has been considered in detail.</p> | | For the purposes of this assessment National Grid has considered that collision risk includes all potential injuries/deaths that may be associated with an avian collision with OHL including electrocution and death occurring either as a direct result of collision or through related injuries (broken wing etc). |

| Table 3: Natural Resources Wales Comments | | | |
|---|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| Environmental Management and Waste: | | | |
| Construction Environmental Management Plan: | 2.9.21 GP821. As well as the older legislation referenced, please also reference Environmental Permitting Regulations 2016 (EPR 2016) | | Wording has been updated to include EPR 2016. |
| | 6.3.6 CL26. Imported material must comply with EPR 2016 and needs to be included in the waste management plan. | | Wording has been updated to include EPR 2016. |
| | 8.6 – Drainage Management: WE23 It is stated that ‘...generally in accordance with PPG6 & GPP13. NRW would welcome a more positive statement of intent. With regard to the wheel wash there is a need to consider the need for a water discharge activity for the muddy water produced. Or provide details of alternative disposal. Similarly. Concrete washing areas require further consideration including: How will these be managed? What pollution prevention methods are expected of the contractor to manage high pH? Where will the washings go? | | Wording relating to compliance with PPG6 and GPP13 has been strengthened. Related to wheel washes and concrete washing areas, the CEMP has been updated to include the following measure: <ul style="list-style-type: none"> water from wheel washing facilities and concrete wash down areas will be contained and not allowed to soak into surrounding ground. Used water will be channelled to a containment tank for disposal off site or to the foul sewer (once treated where required). |
| | 8.5.1 WE41. And 8.5.3 WE43. NRW require dewatering to be in accordance with EPR 2016 or regulatory position statement for temporary dewatering. Applicant needs to expand and define what they intend to do. Options & expectation on the contractor must be defined in the CEMP. | | Wording has been updated to include EPR 2016. |
| | 8.5.3. WE43. Of note, the exemption for dewatering has recently changed in England and Wales. Please see the Natural Resources Wales website for further details. https://naturalresources.wales/permits-and-permissions/water-abstraction-and-impoundment/changes-to-water-abstraction-licensing-exemptions/?lang=en | | Noted |
| | 8.6.5 WE55. Bullet point 6. NRW would request that the applicant expand on the meaning of ‘appropriate barriers’. The CEMP should clearly define the different options/principles of these barriers to ensure the contractors have a clear remit. Bullet point 8. | | Example barrier types are already listed in WE55, and include buffer strips, earth bunds, silt fences and straw bales. Reference to EPR 2016 has been added. |

| Table 3: Natural Resources Wales Comments | | | |
|---|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | NRW would recommend reference is added to any discharge be in accordance with EPR 2016. | | |
| | 8.6 Drainage Management. While this section contains information relevant to protected sites, NRW will have to review alongside the HRA and other relevant chapters when they are released. We have provided comments below where possible in the absence of all relevant documents. | | Noted |
| | 8.6.6 Installation of land drains in wet areas could lead to drainage of valuable habitats. NRW will have to review the detail of the HRA chapter when released to determine the locations where the proposals to drain may be unacceptable/ need review. | | Noted |
| | 8.6.7 NRW would recommend these areas are more clearly identified by a specific grid reference to ensure the correct locations are identified when cross referencing. | | Grid references have been added. |
| | 8.6.9 This section should reference that pollution prevention and anti-siltation measures will apply to all discharges. | | Text has been updated to add this measure. |
| | 8.6.10 We welcome the commitment to preparing a site specific drainage plan this must include how the drainage pattern (both surface sediments and water courses) would be interrupted/modified by the proposed powerline works both during construction and operation, how this would be managed and how pollution risks from silt would be managed. The plan must protect the SAC from drainage impacts caused by work up slope of the boundary as well as from those direct impacts. As many of these impacts must be assessed within the HRA, if the full assessment is not complete when that chapter is released, stringent principles will have to be identified to guide these plans. | | Noted |
| | No consideration is given to diseases in this section e.g. Chytrid or Phytophthora. This should be included moving forward. | | An INNS and biosecurity method statement is included within the BMS (Document 7.7). |
| | 10.2.1 NRW welcome the further commitment to produce an INNS Method Statement (INNSMS) this must also include: The specific washing locations for workers and vehicles | | An INNS and biosecurity method statement is included within the BMS (Document 7.7). |

| Table 3: Natural Resources Wales Comments | | | |
|---|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | NRW would generally require for all species that, where any suggestion of removal is identified, the regulation of this removal and key principles be detailed (this will be controlled waste if removed from site). | | |
| | 10.4.2. Hand removal should also be considered a potential option here. NRW is concerned that soil moving may lead to the spread of seed and follow up work would still be needed on site in subsequent years as it is very unlikely that every seed would be removed. The seed is viable for a very short period – c 2 years – so balsam can be controlled in situ. | | Hand removal is appropriate is now included in the wording within the CEMP (Document 7.4). |
| | 10.9.1. NRW would recommend the wording is slightly altered in this section to make it clear that all areas within the order limits will be controlled, and that the developer can only go further (outside order limits) with land owner agreement. | | As this is a DCO, it would be illegal for activities to be undertaken outside of the Order Limits. |
| | Given the protected species chapter has not yet been provided for review, we may have additional requirements to those detailed below once the full ES has been reviewed. | | Noted. |
| | 2.2 and 4.4 detail tunnel boring and blasting. The noise/ vibration generated should be quantified to ensure there would be no negative impact on fish in the immediate vicinity. If adverse effects cannot be ruled out, it may be appropriate to restrict timings of certain operations | | Noise and vibration modelling has been carried out for the tunnel boring and blasting activities beneath the Menai Strait. This is detailed in Document 5.9.2.18 and used as the basis of the assessment on receptors (fish and marine mammals) in Chapter 9. The mitigation presented in the BMS/CEMP (Document 7.7 and 7.4, respectively) means a restriction in timings of certain operations is not required. |
| | 11.3.1. This section states that 'method statements would be in place' – this is ambiguous and should be more specific. There will be a general need to consider and reference Ecological Compliance Audit (ECA) key performance indicators (KPI's) for each species of EPS be this in the CMEP or Biodiversity Mitigation Strategy(BMS)/other method statements. The reporting mechanism for any species casualties must also be defined. | | Recommendations for the contractor are provided in the BMS (Document 7.7). |
| | 11.3.3. This section appears to apply precautionary buffers to watercourses which is welcomed. However, leaves ambiguity in areas – especially regarding watercourses where otter and water vole are present. This should be more specific. | | The detail is provided in the BMS (Document 7.7). |

| Table 3: Natural Resources Wales Comments | | | |
|---|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | 11.3.10. Bird Nesting Season – Considered in point 1 should also outline procedure if works timings do not fall in appropriate period. | | Noted. |
| | <p>Great Crested Newt (GCN) –</p> <p>GCN could potentially be in the ground throughout the year. Also above ground vegetation may provide refugia. It should be clearer that these works can only be undertaken with specific avoidance and mitigation in place.</p> <p>The CEMP should refer to the specification of any GCN fencing (or link to a specific location somewhere else in the ES/ BMS) and method of removal.</p> <p>NRW would highlight that trapping between October and February could potentially take place if weather condition meet recognised criteria and a data logger is used to evidence this.</p> | | Reference to the appropriate documents has been added for more information, and reference to the use of data loggers has been added to the wording. |
| | We note from the introduction to this section that works will be carried out in accordance to the requirements of the relevant Environmental Permitting Regulations. This would be Flood Risk Activity Permits/exempted activities associated with main rivers. We would advise that works on ordinary watercourses would be subject to Flood Defence Consents/Ordinary watercourse Consents (under the Land Drainage Act 1991) from the relevant Lead Local Flood Authority. We note and support the general principle of surface water run off (from construction areas) will not exceed existing greenfield run off rates. | | Noted |
| | 8.5.2 WE42. Dewatering from the tunnel construction must not overload the receiving watercourse(s) and increase flood risk elsewhere. As such an assessment of rates/capacities should be carried out and appropriate methods of discharge agreed to ensure that the risk are acceptable and can be managed for a range of rates/flooding scenarios. As stated in the document, the rates will be limited to those specified in the Environmental Permit so as not to increase the flood risk | | Noted |
| | 9.2.1 FM11 and 9.2.2 FM12. We note and support the approach taken to compile a detailed Flood Management Plan (FMP). The requirements for Flood Risk Activity permits are in line with the regulations. It is advised that the views of the LLFA are sought with regards to obtaining an OWC for works within 8m of an ordinary watercourse. | | Noted |

| Table 3: Natural Resources Wales Comments | | | |
|---|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | FM13. It is advisable to anchor/pin any temporary trackways in zones C2 where velocities could be sufficient to damage/move the panels. | | Noted |
| | 9.2.3 FM14. We note the intension to design crossings to ‘...safely convey the 1% +climate change flows...’ and that inverts are to be set below the natural bed level. This may require additional surveying (longitudinal section survey) to ascertain the natural bed level where siltation/bed loading has been deposited. Consideration to any siltation should be given when assessing culvert capacities. It is noted that crossings will be installed during periods of normal to low flows. However it should be noted that we do not usually permit in-stream works between October until the following March due to fish spawning and increased flood risk periods. | | Noted |
| | 51. General Principles, GP72, outlines procedures to be followed in the event of certain incidents point d) details when NRW would be consulted. NRW should also be informed of any incident which may affect designated sites. | | Noted |
| | 52. Biosecurity 10, As previously referenced, the scope of this section is too narrow, any potential INNS issue must be referenced as a minimum at a high level. When considering HRA issues, it will be necessary to include a higher level of detail upfront in the ES given the risk of introducing these species to areas along the working corridor (not as a post consent document). | | Recommendations and requirements for the contractor are provided in the CEMP (Document 7.4) and BMS (Document 7.7). |
| | 53. Biosecurity, BS11, should also detail how and where disinfectant used for washing would be disposed of. | | BS11 has been updated to state: <i>‘Disposal of disinfectant used during the Proposed Development would be undertaken in accordance with standard procedures’</i> |
| | 54. Biodiversity and Nature Conservation, BNS22-24 references that no materials should be stored “on or adjacent to designated sites and areas of protected habitat”. NRW welcome this statement and the subsequent points which include further desired buffers and commitment to clearly mark protected areas. However, given the nature of the sites which the proposed route will be adjacent to and affecting, NRW would require a more precautionary approach. This is primarily due to the risk of silt laden runoff from stockpiles or fuel spillages. NRW would request that any required stockpiling, storage of materials/fuels or re- fuelling required within 30m of a protected site is first checked with | | The wording has been amended. |

| Table 3: Natural Resources Wales Comments | | | |
|---|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | NRW to ensure the appropriate safeguards are in place and that the operation is not likely to result in damage at that specific location. | | |
| Outline materials management plan: | NRW is concerned that generally this document appears to confuse materials with waste and shows a weak appreciation of the difference between material and waste. The document text interchanges between the two words and does not give the confidence that expectations on a contractor are clear. NRW would recommend the document is reviewed with this in mind, as well as the specific comments below. | | The document has been revised to clearly separate the discussion of materials in the OMMP from the discussion of waste in the OWMP. |
| | 1.2.4 'list of parties'. Should include a National Grid manager responsible for overseeing the plan. This should also include the 'Qualified Person'. The applicant should be aware that if material is defined as having a certainty of use and has a CL:AIRE declaration. NRW do not regulate that declaration | | Text added to 1.2.4 (now 1.2.5) Noted |
| | 1.2.5. We would recommend the CL:AIRE verification process is referenced here. | | Verification process referred to. |
| | 1.2.8. It should be made clear in this section that a CL:AIRE declaration is needed. | | Text added to 1.2.8 (now 1.2.9). |
| | 1.2.9 to 1.2.13. The applicant refers to waste treatment, disposal, waste carriers and permits. It would appear that the terms materials and waste have been used interchangeably in parts. If the material is genuinely material, then it falls within the MMP. If not, it's a waste and should be included in the waste management plan. The MMP needs to reflect a defined materials strategy separate to waste. | | The document has been revised to clearly separate the discussion of materials in the OMMP from the discussion of waste in the OWMP. |
| | As a general note, the MMP template should reference NRW not EA. | | The template has been amended to show NRW in place of EA. |
| Outline waste management plan: | NRW have the below general comments to make on the waste management plan for consideration moving forwards: | | Noted |
| | Site availability may change, some of the sites listed but not commented upon may potentially be unavailable upon commencement of this construction project. | | Noted. The document has been updated prior to final issue. |

| Table 3: Natural Resources Wales Comments | | | |
|---|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | Caution should be exercised in using annual permitted tonnage, as although a site maybe permitted for a certain tonnage it may not be able to receive/handle this quantity. | | Noted. Comment has been made where waste handling was considered a potential issue. |
| | Sites will have management systems/operating procedures setting out limits on waste acceptance which may not be in line with permitted limited. | | Noted. |
| | Waste must be classified by the producer or holder. Permitted sites are only able to accept specified waste. Upon construction and therefore waste classification it may be apparent that identified facilities are not able to accept particular wastes due to classification and/or testing results. | | Noted. |
| | The legislation section should include Environmental Permitting Regulations 2016. The same is true of Appendix 2. | | Text added to Section 2 on the Environmental Permitting Regulations 2016. |

Page intentionally blank

5 Welsh Government

Page intentionally blank

| Table 4: Welsh Government | | | |
|---------------------------------|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| Traffic and Transport | | | |
| | <p>Section 4.2.9 of the Environmental Statement states that:-</p> <p>These effects will be assessed in the context of two ‘rules of thumb’ which 4.2.9 are taken from the IEMA Guidelines, which help to define which roads need to be considered within the assessment.</p> <ul style="list-style-type: none"> Rule 1: Include highway links where total traffic flows are predicted to increase as a consequence of a development by more than 30% (or where the number of Heavy Goods Vehicles (HGVs) is predicted to increase by more than 30%); <p>The DMRB requires the designer to review any section of the Trunk Road network which includes a 5% increase in traffic as a consequence of the proposed development.</p> | | ES Chapter 13 assesses all highway links that have been identified as construction traffic routes for the Proposed Development. |
| | Section 4.3.7 of the Environmental Statement states that 2023 has been chosen as the future baseline year as it represents the final year of significant construction activity - Further information is required outlining the reason for 2023 being the worst year, also in-line with Section 4.3.13. | | Further explanation is provided in ES Chapter 13 as to the reason for 2023 being selected and the peak year of Proposed Development construction traffic activity. |
| | Section 4.3.19 of the Environmental Statement – Future baseline values must include Wylfa Newydd Power Station construction traffic. | | Wylfa Newydd construction traffic has not been included in the Future Baseline as it is not a consented scheme. It is considered in the Cumulative Assessment. |
| | Not all the plans have been provided. | | Noted. |
| | The T.A. makes reference to NMWTRA being the maintaining authority for the Trunk Road across Anglesey, this is actually U.K. Highways - Section 4.2.1 of the T.A. | | Noted. |
| | T.A. doesn’t investigate the capacity of the Trunk Road network or assess the flow through junctions/slip-roads or the A55 main-line. | | |

| Table 4: Welsh Government | | | |
|---------------------------------|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | Assignment of vehicles against particular routes requires further explanation. | | Noted and explained further in the submission documents. |
| | The mainland AIL routes don't appear to access the same site? | | Clarified in the submission documents. |
| | Confirmation that 2023 is the cumulative peak construction year. | | Further explanation is provided in ES Chapter 13 as to the reason for 2023 being selected and the peak year of Proposed Development construction traffic activity. |
| | Confirmation that 2023 is the worse case during the Trunk Road peak periods, especially with a variance of site operation times. | | Further explanation is provided in ES Chapter 13 as to the reason for 2023 being selected and the peak year of Proposed Development construction traffic activity. |
| Historic Environment | | | |
| | Thank you for your email of 21 March and our subsequent meeting of 16 April about the draft Environment Statement (ES) and Statement of Common Ground (SoCG) in respect of the above project. We have the following comments on the draft ES. | | Noted |
| Scheduled Monuments | The ES provides a comprehensive evaluation of the impact of the proposed development on scheduled monuments within the search area and takes account of relevant policies and best practice guidance. It has also taken into account issues raised by Cadw officers during field visits and meetings. | | Noted |
| | The selected route is such that for the most part it avoids scheduled monuments although a small number remain within the search area with potential for impact on their settings, including Bryn Celli Ddu burial chamber – which is in the guardianship of Cadw and a popular visitor attraction on the island. | | Noted |
| | We are content that the ES presents a fair and reasonable assessment of the significance of the scheduled monuments in the search area and that it presents a reasonable assessment of the impact of the scheme on those scheduled monuments. | | Noted |
| | Throughout the development of the scheme Cadw has expressed particular concern about the potential for adverse impact on the setting of Bryn Celli Ddu burial chamber. This prehistoric burial site is unique in Wales on account of its solar alignment with the summer solstice sun. The Braint THH/CSEC and the OHL leading to it will be 1.1-1.2km from the burial chamber – but outside the area that has been defined as the funerary landscape of associated monuments as it is | | Noted |

| Table 4: Welsh Government | | | |
|---------------------------------------|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | currently understood. The evaluation demonstrates that additional pylons will be visible from this monument but that they will not impose directly into the line of the summer solstice sun or to other funerary monuments. As such the assessment of moderate impact appears reasonable. It would be preferable not to have additional infrastructure visible from the monument and consideration of additional landscape screening could be beneficial in this regard. However, overall the level of impact is not likely to be such that it will prevent appreciation of the unique significance of the monument. | | |
| | Furthermore, the archaeological strategy proposed in the ES is appropriate, presenting an emphasis on avoidance and preservation of in situ remains. One area that raises some concerns relates to the Roman Road between Segontium and Aber (HER 17834), part of which runs through the proposed location of the Pentir Construction Compound. While it is correct that the stretch of road is part of a much larger feature it would be best practice to minimise loss by avoiding disturbance wherever possible. | | Noted. It is the intention to locate the construction compound to avoid the line of the Roman road if at all possible. |
| | The Strategy should ensure that all data collected during the project is done in a manner suitable for it to be readily and completely integrated directly into the statutory Historic Environment Record managed by the Gwynedd Archaeological Trust on behalf of Welsh Ministers. This should apply not only to the final project report but also to the individual site records collected during the course of the project which should include short summary information suitable for incorporation into <i>Archwilio</i> . | | The Archaeological Strategy has been amended to ensure provision for this. |
| | The scale of the work is such that considerable archaeological monitoring will be required and it is recommended that formal resourcing arrangements should be agreed with the local planning authority and their archaeological advisors before work commences. | | National Grid is discussion with IACC and Gwynedd Council regarding resourcing. |
| Registered Historic Parks and Gardens | The impact of the proposed development on the grade I registered historic parks and gardens at Plas Newydd PGW(Gd)48(ANG) and Vaynol PGW(Gd)52(GWY) has been assessed. We welcome the proposal to bury the proposed connection via a deep tunnel beneath the Menai Strait and the grade I registered parks and gardens to avoid any direct impact them and their significant views. It is highly likely that alternative options locating the works and infrastructure inside, or closer, to the registered area boundaries would have a greater adverse impact on the registered historic assets. | | Noted |

| Table 4: Welsh Government | | | |
|---------------------------------|--|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | We note that the ES concludes that the proposed development would not have a significant impact on the grade I registered historic parks and gardens at Plas Newydd and Vaynol and we have no reason to disagree with this conclusion. | | Noted |
| Listed Buildings | As we previously mentioned, we are concerned that grade II listed buildings have been identified as only having regional importance with a medium heritage value. However, we accept that even if this value were upgraded to reflect their national importance it is unlikely to lead to any 'significant' effects in terms of setting. This is a consequence of the proposed new line being largely parallel to the existing one and the resultant impacts therefore being unlikely to be 'significant'. | | The ES chapter has been amended for the final submission, with Grade II listed buildings all identified as being of high value. |
| | In general, the assessment appears to consider all of the buildings that are likely to be affected and assesses them appropriately. We have slight concerns that some of the impacts are considered to be lower because the wider landscape is not thought to contribute to the significance of the asset. For example, at Cemaes Mill (LB 5348) we consider that the landscape is likely to contribute to a greater significance and those listed buildings within very open landscapes (such as the area around Maenaddwyn (see LB 5390)) are likely to be more impacted than the stated conclusion. | | Noted |
| | Apart from the issue of the significance of grade II listed buildings being underestimated and our concerns on the importance of the contribution of the wider landscape on certain listed buildings, we accept the approach that you have taken. | | Noted |
| Conclusion | Subject to the issues raised above being addressed we would be happy to confirm that the ES adequate and accurate. | | Noted |

6 National Trust

Page intentionally blank

| Table 5: National Trust | | | |
|---------------------------------|---|----------------|---|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| Noise and Vibration | | | |
| | We still have concerns that insufficient detail has been provided relating to the impact of vibration on the property and its sensitivity categorisation within the impact assessment documentation. We hope that a specific report can be provided to demonstrate actual impact on the property and recognition of the specific issue of vibration at the Whistler painting, instead of being screened out due to the nature of the property. | | <p>Plas Newydd was not screened out of the construction noise and vibration assessment, as the National Trust has stated, but was not included in the assessment in the draft ES because the building was not within the study area. In the final ES, Plas Newydd has been included within the assessment as the grounds are within the study area, although the property is still outside the study area.</p> <p>A specific report of the potential effects of vibration on the Whistler painting is being carried out as a separate study. This will be issued to the National Trust when complete.</p> |
| Traffic and Transport | | | |
| | There is some contradiction in terms of the anticipated program of the construction works and this needs to be clarified or updated; | | Further explanation is provided in ES Chapter 13 as to the reason for 2023 being selected and the peak year of Proposed Development construction traffic activity. |
| | We are concerned that the capacity assessment of the Tollgate junction underestimates the capacity issues at this location because the reported operation of the junction under existing conditions does not reflect the degree of queuing and delays that currently occur. This should be reviewed in order to establish whether the proposal to restrict HGV traffic during summer holiday pm peak periods should be extended to other periods. | | This junction is identified for use in a Contingency situation where a preferred route is unavailable. The junction has been modelled and validated using queue length survey information. The methodology for the assessment has been agreed with IACC. |
| | It is recognised that the CTMP is currently in draft format. We would envisage that the CTMP will be secured by planning condition and therefore it is important that it contains clear measures to protect National Trust interests and minimise the impact of construction traffic on the A4080 and the Tollgate junction. | | Noted. The OCTMP is secured via draft Requirement 6 of the draft DCO (Document 2.1) |
| | National Trust seeks assurances that the CTMP will clearly state that: Access F1 be designated the primary access point for the Braint THH works, with access F2 onto the A4 080 used only when operational | | Noted. This route is identified as a contingency route in the OCTMP (Document 7.5). |

| Table 5: National Trust | | | |
|---------------------------------|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | <p>requirements make it impracticable to use F1. All LGV traffic should use F1.</p> <p>Construction traffic to and from F1 to travel to and from the A5 along link 15 and so avoid travelling on the A4080 altogether.</p> <p>Timing of AIL movements along the A4080 should be outside of core working hours.</p> | | |
| | We would envisage that the CTMP is likely to include provision that the movement of construction traffic be restricted or removed during certain local special events. We would hope that further discussion is undertaken to ensure that regular and special events at Plas Newydd should be included amongst those listed within the CTMP. | | Further explanation is provided in ES Chapter 13 as to the reason for 2023 being selected and the peak year of Proposed Development construction traffic activity. |
| Socio Economics and Tourism | | | |
| Visitor Survey Results | We note that none of the submitted survey results and associated conclusions use National Trust properties. The survey work provided within Appendix 17.3 (Visitor Survey Results) is not based on any survey work completed at three of the most visited properties in North Wales (Penrhyn, Plas Newydd and Cae Glan Mor). | | <p>Attractions/locations were grouped into categories and contacted to see if they would wish to take part. Each category required a certain quota of attractions to be recruited. Recruitment was achieved via direct phone calls or by email. Contact was made with Plas Newydd via email. The quota was reached by other attractions agreeing to take part before the recruitment of Plas Newydd had been confirmed. Essentially the process is on a 'first come first served' basis for recruiting attractions within each category, and Plas Newydd was not therefore captured in the quota.</p> <p>The visitor survey questions were not location-specific. Examples of questions include: What influenced your decision to come to Anglesey / this area of Gwynedd? How likely are you to visit Anglesey / this area of Gwynedd again in future? Would the presence of additional pylons and power lines make you more or less likely to visit Anglesey / this part of Gwynedd again? (Full survey results are included in the Document 5.17.2.3).</p> <p>A summary of the tourism attraction amenity assessment (included in Chapter 17 of the ES, Document 5.17) is provided as follows:</p> <p>Within the context of this assessment, 'amenity' is the term used to describe the overall pleasantness or attractiveness of the surroundings. Detrimental</p> |

| Table 5: National Trust | | | |
|---------------------------------|---------|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | <p>effects on amenity are generally considered to arise when visual, traffic, air quality and noise effects coincide on a particular area or receptor. The amenity assessment of tourist attractions and recreational resources considers assets such as Country Parks, and cultural heritage or ecological sites that have a recreational or tourism draw. The sensitivity and level of importance of the tourism receptors in the socio-economic context is considered on a case-by-case basis depending on the tourism or recreational offer provided and the likely sensitivity of the receptor to environmental effects.</p> <p>Tourist attractions up to 10 km from the Order Limits were included in the assessment. Of the 37 tourist attractions and recreational resources considered in the assessment, 13 were considered to be of high value from a socio-economic perspective.</p> <p>Out of the 13, only two are within 1 km of the Proposed Development: Vaynol Park and Plas Newydd House and Gardens. A minor adverse effect is predicted on the nearest Highway Links (Link 16 for Plas Newydd and Link 19 for Vaynol Park); however, negligible or no effects are anticipated for visual, air quality and noise effects at these locations during construction; as such the overall amenity effect is assessed as not significant. During operation, there would be no operational noise effects and the adverse visual effect would be minor, meaning the overall amenity effect would be not significant. Accordingly, there would be limited potential for an impact on tourism revenue (only Plas Newydd is fee-paying; Vaynol Park is non-fee-paying with limited public access).</p> <p>Further detail of the Amenity Assessment (provided in full in Appendix 17.1, Document 5.17.2.1) is as follows:</p> <p>At Plas Newydd House and Gardens, during construction visual and air quality effects are assessed to be negligible, and traffic effects are assessed to be minor. The receptor is outside of the study area for construction noise effects. During operation, the assessment identifies the potential for a minor effect on amenity as a result of effects on views.</p> <p>Penrhyn Castle is also assessed as a tourist receptor for effects on amenity, falling just within the study area. Due to the distance from the Proposed</p> |

| Table 5: National Trust | | | |
|---|---|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | | | Development, effects are anticipated to be negligible at this receptor. Effects are also anticipated to be negligible at Cae Glan Mor. |
| Cumulative Impact on Tourist Accommodation Availability | Concerns remains at the uncertainty in relation to cumulative impact on tourist accommodation availability with the need for greater consideration of Wylfa, National Grid and 3rd Menai Crossing cumulative accommodation impacts. National Trust investment at our North Wales properties relies on a vibrant tourism industry, and the availability of headroom in accommodation. We have remaining concerns about the potential tourism image issue for Anglesey and the need for planning positive measures associated with any emerging impacts on tourism revenue (should the fear factor be realised in Anglesey as discussed and identified in the consideration of Well Being and Socio Economics). In this context we note the submission of a Well Being Report (Document 5.27) but would note that many of the emerging issues examined in both the workshop and document are not taken forward in mitigation and the substantive issue of “unforeseen consequences” does not appear in any mitigation or potential compensation action. | | <p>Total cumulative demand for tourist accommodation as a percent of headroom (NWC and Horizon combined) is 17%. This includes demand for hotels, guest houses, B&Bs and Self-catering. For caravans, total cumulative demand as a percent of headroom is 25%.</p> <p>For Wylfa Newydd Power Station, it is estimated that the majority of the demand for tourism accommodation would be in Anglesey North and Anglesey West. Based on the available capacity in these areas, no adverse effects on availability are predicted. Nonetheless, it is recognised that uncontrolled access to this stock could create some localised effects. Based on this uncertainty and the sensitivity of this stock, the potential effect is assessed as minor adverse.</p> <p>Peak demand for tourism accommodation during construction of the Proposed Development is around 71 bed spaces (excluding caravan and camping accommodation). Given the low number of workers on the Proposed Development compared to Wylfa Newydd Power Station, and given that workers on the Proposed Development are likely to concentrate in the south of Anglesey and on the mainland, it is considered highly unlikely that workers on the Proposed Development would concentrate in sufficient numbers to alter the pressure on demand in Anglesey North and Anglesey West created by the power station project. The overall cumulative effect on tourism accommodation (excluding caravanning and camping) is considered to be minor adverse.</p> |
| Landscape | | | |
| | We would wish to see specific landscape proposals from the Braint Tunnel Head House to clarify the approach to landscape and boundary management at the junction with A4080 for both construction and operation. | | Landscape Proposals are shown on Figure 7.14 Landscape Mitigation Proposals for Braint THH/CSEC. |

7 North Wales Fire and Rescue Service

Page intentionally blank

| Table 6: North Wales Fire and Rescue Service (NWFRS) | | | |
|--|--|----------------|--|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| Chapter 4 | | | |
| | Page 40, 2.7.1 makes reference to third party assets which may be impacted and which may be required to be modified – does this include any fire hydrants? It is noted that 2.7.2 identifies that it is likely that any works will be undertaken by the asset owners and it is therefore considered that this will be done by Dwr Cymru / Welsh Water. | | National Grid and Dwr Cymru/Welsh Water are in discussion in order to progress the resolution of matters relating to the interaction between the North Wales Connection Project and existing Welsh Water infrastructure and assets. These matters are being captured within a Statement of Common Ground with drafts having been exchanged between both parties. |
| Traffic and Transport | | | |
| Appendix 13.1 Transport Assessment | Page 3, 1.1.14 makes reference to the CTMP and it is noted that a draft version of this has been previously been circulated to stakeholders however and updated version is still being awaited. Further it would be appropriate to understand how the NG CTMP will work alongside/integrate with the Horizon Nuclear Power CTMP especially in those areas where both developments are being undertaken simultaneously. | | The Outline CTMP (Document 7.5) has been issued in draft and the contents have been discussed at thematic working group meetings since these comments were made. The submission document has been produced considering representations made by NWFRS. |
| | Page 68, 5.4.1 makes reference to Construction Traffic Route Hazard Risk Register – which is also hyperlinked in the Construction Traffic Management Plan (CTMP)(Document 7.7) – The CTMP together with the assessment documents provide a thorough assessment of the transportation impacts of the proposed development and the measure proposed to mitigate the effects (Page 3, 1.1.5) | | The Outline CTMP (Document 7.5) includes as an Annex a Construction Traffic Route Hazard Risk Register. |
| | Page 70, 5.7 Abnormal Indivisible Load Movements – reference is made to a report which is note included in the batch of documents – this has subsequently been shared. | | Noted. |
| | Page 99, 6.3.1 makes reference to contingency routes and that they will only be used in exceptional circumstances – further information would be welcomed as to the criteria for their use and how this will be managed and information shared when this occurs. | | The ES, TA (Document 5.13.2.1) and Outline CTMP (Document 7.5) all include a definition of what renders a preferred route ‘unavailable’, which is when exceptional circumstances would apply requiring use of contingency routes. |
| | Page 235, 12.9 makes reference to staff transportation although it is noted that the documentations makes reference to parking for company vehicles only within | | More detail on this is provided in the Transport Assessment. |

| Table 6: North Wales Fire and Rescue Service (NWFRS) | | | |
|--|--|----------------|------------------------------------|
| Consultee and Section Reference | Comment | Reference Code | How the comment has been addressed |
| | construction compounds – more detail would be needed as to where construction staff are expected to park especially if using mini bus to transport to compounds / work sites – this will avoid de facto car parks springing up and being a potential issue within communities. | | |
| | NWFRS would welcome the opportunity to have sight of the TIMP for the proposed development. Further to this it would be advantageous to understand the relationship between the NG TIMP and the HNP TIMP. | | Noted |
| Construction Environmental Management Plan | | | |
| | Page 10, 2.4.1 refers to the code of conduct and identifies key sections. Community safety is one area that North Wales Fire & Rescue Service works closely with partner agencies and would welcome an opportunity to have sight of such documents. | | Noted |
| | Page 11, 2.5.6, 2.5.7 and 2.5.8 makes reference to engagement with the emergency services prior to and during construction to ensure that personnel are familiar with site layouts and that the emergency services are fully briefed – this is to be welcomed and early engagement will ensure robust arrangements are put in place. | | Noted |

8 Planning Inspectorate

Page intentionally blank

Table 7: Planning Inspectorate

| Section Reference | | Extract from Document | Comment | Reference Code | How the comment has been addressed |
|-------------------|-----------|--|---|----------------|--|
| 1 | 1.5.6 | Part II, Paragraph 10 of The Conservation of Habitat and Species Regulations 2017 (England and Wales) provides a definition of the term “European Site” which it identifies as including SAC and SPA sites, as well as candidate/proposed sites (cSAC and pSPA) which are being consulted on or are pending a European Commission decision. However, the Habitats Regulations do not provide statutory protection for pSPAs or to cSACs before they are agreed with the European Commission. For the purpose of considering development proposals and their likely impacts on such sites, as a matter of policy, the UK Government wishes those pSPAs and cSACs that have been included in a list sent to the European Commission, to be considered in the same way as if they have already been classified. | The definition of European sites is in Part 1, paragraph 8 of the 2017 Habitats Regulations and does not directly refer to the status of pSPAs. It would be helpful to explain that the policy approach to the treatment of pSPAs is supported by the NPS EN-1 and TAN-5 (so by both UK and Welsh government policy). | | The HRA Report (Document 5.23) has been updated to address this comment. |
| 2 | 1.5.7 | Ramsar sites are wetlands of international importance that have been 1.5.7designated under the Ramsar Convention (1971) (Ref 1.12) | As the protection given under planning policy for pSPAs is referred to in paragraph 1.5.6 of the NSER, should there also be a reference to the protection under the same policies for listed Ramsar sites? | | The HRA Report (Document 5.23) has been updated to address this comment. |
| 3 | Section 3 | Description of the Proposed Development | Will this project description also appear in the ES? If so, could the NSER simply refer to this chapter of the ES rather than reproducing the same material? | | The HRA Report (Document 5.23) still includes this information, to ensure it is a standalone document; however it is a direct copy of the same sections in the ES. |
| 4 | 4.2.37 | For pylon locations where ground conditions do not easily permit the installation of pad and column, mini-pile or tube pile foundations, a bespoke foundation would be required. The design for each bespoke foundation would be subject to the ground conditions encountered. | It is unclear what a bespoke foundation is likely to entail or if/how any effects associated with its construction have been taken into account. The NSER needs to address this point. | | A bespoke pylon foundation is a non-standard type of foundations. The potential effects associated with bespoke foundations would be no worse than those assessed for a standard type. |
| 5 | Table 5.1 | General | This is a really useful table (notwithstanding the comments below) which helps the reader to understand the assumptions that have been taken into account in the assessment of the effects from the Proposed Development. | | Noted |

| Table 7: Planning Inspectorate | | | | | |
|--------------------------------|-----------|---|---|----------------|--|
| Section Reference | | Extract from Document | Comment | Reference Code | How the comment has been addressed |
| 6 | Table 5.1 | The height shown on the ES Indicative Pylon Schedule...is considered a reasonable proxy for the effects should a 6m extension be added. | The table doesn't provide any justification as to why the height shown on the Schedule is a reasonable proxy for pylons that could actually be up to 6m taller than those shown. | | This text has been updated. |
| 7 | Table 5.1 | Pylon footprint (permanent): This is not of relevance to this assessment. No permanent infrastructure would be located within Natura 2000 sites. | Locating permanent infrastructure outside a Natura 2000 site could still lead to significant effects on designated features through loss of foraging/roosting/commuting areas or routes. | | Noted – where habitat is 'supporting habitat' this is considered within the assessment. |
| 8 | 5.3.2 | Information sources have included a high level desk study review, extended Phase 1 Habitat surveys and wintering bird surveys within accessible areas. | The reference to 'accessible areas' is a concern because it suggests that survey coverage could have been decided by which land the Applicant could access rather than ecological requirements. The NSER should provide a justification (with reference to the relevant chapter of the ES if appropriate) that survey coverage has been adequate. | | Wintering Bird surveys have been sufficiently comprehensive to allow the assessment to be undertaken. |
| 9 | 5.3.9 | Survey areas | This paragraph describes the areas covered by the relevant surveys but there is no justification for the extent of the study areas until paragraph 6.3.11 of the NSER. It would be helpful for the reader if paragraph 5.3.9 provided a justification or cross-referred to one elsewhere in the document. | | A cross reference has now been added into section 5.5.9 to section 6. |
| 10 | 5.3.9 | Intertidal habitat surveys were undertaken to determine presence/absence of NRW ascribed habitats. | It isn't clear what is meant by 'NRW ascribed habitats'. This description needs more explanation. | | This has been referred to paragraph 7.9.4 which outlines that it is based on NRW survey data. |
| 11 | 5.3.9 | Outcome of surveys | Survey results should be reported in the NSER or in the relevant chapter of the ES and cross-referenced in the HRA. | | Survey results are reported in Chapter 9 Ecology and Nature Conservation (Document 5.9) and its appendices. These are cross referenced where necessary. |
| 12 | Table 6.1 | Direct loss or fragmentation of supporting habitat during the operation of the proposed development. However due to the small permanent area of habitat affected the Proposed | It would be helpful if the NSER quantified the area of habitat that would be affected as it | | Text has been updated, however it is not possible to specify an exact area of habitat loss and it is also habitat that is not specifically identified as |

| Table 7: Planning Inspectorate | | | | | |
|--------------------------------|--------|---|---|----------------|--|
| Section Reference | | Extract from Document | Comment | Reference Code | How the comment has been addressed |
| | | Development would not result in the significant direct loss or fragmentation of supporting habitat during the operation of the Proposed Development. | allows the reader to decide if they agree that only a small area would be affected. | | supporting habitat. The losses are mostly losses under the legs of pylons. |
| 13 | 6.3.29 | These study areas align with standard practice for construction projects and have been discussed with IACC and GC. | Should NRW also be consulted so that they are satisfied that the study areas are adequate to capture effects on ecological receptors? | | NRW were also consulted on the study area and the text has been updated accordingly. |
| 14 | 6.3.34 | National Grid's experience of operating the existing high voltage transmission system in England and Wales shows that there are no significant audible noise effects beyond this distance for the proposed technology option. | Is there any published report or paper that captures this experience that could be referred to here? | | This experience is based on many years' operating the 400 kV and 275 kV electricity transmission network in England and Wales and as far as National Grid is aware this experience has not been published in a paper or report. For operational noise effects from overhead lines, a distance of 200 m (or 200 m plus limit of deviation) is often quoted when setting an initial study area for identifying potentially sensitive receptors for assessment, for substations the initial study area is set much wider. The operational noise assessment itself is carried out using a proprietary noise modelling package (such as Soundplan or CadnaA). The noise contours and receptor database within these packages is not restricted to any stated study area and therefore any predicted significant effects beyond, although highly unlikely to occur, would be identified at an early stage and the study area refined as appropriate. It should be noted that operational noise assessment is an iterative process and that the assessment is constantly reviewed during the development of the Environmental Statement, this includes liaison with other ES disciplines whose study areas would be much wider. |
| 15 | 6.3.57 | Liverpool Bay SPA/pSPA | This SPA is partly within England. Have Natural England been consulted about potential effects on this site? | | NRW has confirmed that usually the organisation in whose area the development is situated takes the |

| Table 7: Planning Inspectorate | | | | | |
|--------------------------------|-------------------------|--|---|----------------|---|
| Section Reference | | Extract from Document | Comment | Reference Code | How the comment has been addressed |
| | | | | | lead where designations cross organisational boundaries. |
| 16 | Table 6.3 | Conservation objectives for Pen Llyn a'r Sarnau SAC | For grey seal, bottlenose dolphin and otter under 'Range', the first bullet point reads 'As part of this objective it should be noted that for bottlenose dolphin, otter and grey seal' – is there some missing text here? | | This text is no longer in the ES. |
| 17 | Table 6.4 | No mechanism for likely significant effects | For several of the interest features considered in this table (eg Geyer's whorl snail, otter and great crested newt), particularly in relation to Corsydd Môn a Llyn Ramsar site, the text in the table seems to suggest that there could be a mechanism for an effect and it isn't always clear how the conclusion has been reached that there is no such mechanism. | | This table has been updated to provide greater clarity. |
| 18 | Table 6.4 | Corsydd Môn a Llyn Ramsar – marsh fritillary: ...the low sensitivity of terrestrial invertebrates to temporary loss of suitable habitat... | This statement refers to terrestrial invertebrates rather than specifically to marsh fritillaries which is the feature under consideration. Is there specific evidence available which supports this statement? | | Additional information regarding marsh fritillary is provided in section 7.7.77 to 7.7.80 of ES Chapter 9 Ecology and Nature Conservation (Document 5.9) and Appendix 9.14 (Document 5.9.2.14). |
| 19 | Table 6.4 | ...Natural England report that cormorant have a mean maximum foraging range of 25km from breeding sites (Ref 6.30); however Thaxter et al 2012 (Ref 6.35), report that the mean foraging range of cormorant 5.2km...it is assumed that for the purpose of this assessment that cormorants behave similarly outside of the breeding season. | It isn't clear from the text what the justification is for relying on the mean maximum foraging range reported in Thaxter rather than that in the Natural England report. Is there any evidence available to support the assumption about cormorant behaviour? | | Further details have been provided in ES Chapter 5.9, Ecology and Nature Conservation (Document 5.9) and associated Appendix 9.15 Ornithological Assessment Report (Document 5.9.2.15). |
| 20 | Figure 3 (Doc 5.23.1.1) | | Is there actually any difference between the alignments at this point of the route? It is hard to see any difference from Figure 3. If | | The alignments are contiguous in some sections, however the plans are provided for the sake of completeness and to avoid any confusion. |

Table 7: Planning Inspectorate

| Section Reference | | Extract from Document | Comment | Reference Code | How the comment has been addressed |
|-------------------|---|--|--|----------------|--|
| | | | both options are the same at this point then is there any point in showing both options? | | |
| 21 | Appendix 1 Screening matrices | Screening matrix 5: Pen Llyn a'r Sarnau SAC | The qualifying feature 'Sandbanks which are slightly covered by sea water all the time' has not been included in the matrix. | | As outlined in Table 9.12, this site is distant from the Order Limit so only the mobile designated receptors are considered. |
| 22 | Appendix 1 Screening matrices | - | Some of the footnotes refer back to Table 6.4 of the NSER but as Table 6.4 doesn't always explain where evidence has been derived from it would make more sense to refer to the relevant sections of the ES where the evidence is presented. It is not particularly helpful to refer simply to an ES chapter – the footnotes should clearly identify the relevant sections of the chapter which contain the evidence supporting the conclusions in the screening matrices. | | Cross references have been added into Table 6.4 to identify the relevant baseline information in the appendices to ES Chapter 9 Ecology and Nature Conservation (Document 5.9). |
| 23 | Appendix 1 – Screening matrices, Matrix 1, footnote g | 'No Likely Significant effect concluded at Screening Stage 1bC therefore there is no requirement for an In-combination test to be undertaken. Please refer to Plate 3.1, Screening Methodology of the No Significant Effects Report (Document 5.23). | It would assist the reader in understanding the reasoning behind the exclusion of significant in-combination effects if it was stated here that no mechanism for the effect to occur had been identified and therefore there in- combination effects can be excluded. | | This comment is no longer relevant as the in combination assessment is now undertaken at the appropriate assessment stage. |