



Eich cyf/Your ref **EN020015**
Ein cyf/Our ref

Llywodraeth Cymru
Welsh Government

FAO: Case Officer (North Wales Connection)
National Infrastructure Planning
The Planning Inspectorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

29 November 2018

Dear Madam/Sir

EN020015 North Wales Connection: Articles 3 & 4 of The Infrastructure Planning (Interested Parties and Miscellaneous Prescribed Provisions) Regulations 2015

In accordance with the above articles this letter confirms that Welsh Ministers wish formally to register as an Interested Party, and provides an outline of the principal issues on which the Welsh Ministers (hereinafter referred to as Welsh Government) propose to make further representations during the examination.

The main point of contact here will be Mr James Hooker (Wylfa Newydd Spatial Planning Manager) who has registered relevant details through your website.

1 Introduction

- 1.1.1 The Welsh Government is in principle supportive of a new 400 kV connection between the existing substations at Wylfa and Pentir to facilitate the export of power from the proposed Wylfa Newydd Nuclear Power Station. The new connection would be key in the context of future UK and Welsh energy security and distribution. The new connection would also be an enabler for realising the Welsh Government's renewable and low carbon ambitions in respect of Anglesey's Energy Island proposals. The Welsh Government's support is however conditional upon all potential impacts in key areas of interest to the Welsh Government being sufficiently mitigated and unmitigated costs, should they arise, not falling upon the Welsh public purse.

- 1.1.2 It is recognised that under the Electricity Act 1989 National Grid has various statutory duties, including:
- to develop, and maintain an efficient, co-ordinated and economical system of electrical transmission; and
 - to mitigate any effect which the proposals would have on the natural beauty of the countryside or any flora, fauna, features, sites, and buildings.
- 1.1.3 The relationship between the North Wales Connection project and the Wylfa Newydd Nuclear Power Station development, both in terms of need, geography and construction timelines means many of the impacts are common to both and must be considered cumulatively. Welsh Government has made representations to the Wylfa Newydd examination, raising several concerns and requesting further information. Our comments upon those matters that must be considered cumulatively, are therefore dependent upon the progress of the Wylfa Newydd examination, and if necessary will be amended accordingly throughout the examination of the North Wales Connection project.
- 1.1.4 The Welsh Government is listed in legislation as a Statutory Party in respect of any Nationally Significant Infrastructure Project in Wales. The relevant planning legislation for Nationally Significant Infrastructure Projects does not prescribe restrictions on the role of the Welsh Government in the Development Consent Order (DCO) process.
- 1.1.5 Welsh Government has a general power under s60 Government of Wales Act 2006 (“the 2006 Act”) to do anything which it considers is appropriate to achieve the promotion of economic, social or environmental well-being of Wales. Areas of responsibility which are devolved to Welsh Government pursuant to the 2006 Act (as amended by the Wales Act 2017) include;
- Economic development;
 - Education and training;
 - Environment;
 - Health and health services;
 - Highways and transport;
 - Housing;
 - Tourism;
 - Planning; and
 - Welsh Language.
- 1.1.6 Welsh Government, as a devolved public body is also under a duty pursuant to section 3 of the Well-Being of Future Generations Act 2015 (“the 2015 Act”) to carry out “sustainable development”. Consequently, Welsh Government is under a duty pursuant to s3 of the 2015 Act to take all reasonable steps in the exercise of its functions to meet the well-being objectives for the whole of Wales. Engaging in the DCO process and ensuring appropriate mitigation is secured, is consistent with that duty.

2 Pre-application Engagement

- 2.1.1 Welsh Government has engaged with National Grid throughout the pre-application stage through various workshops, briefings, reviews of draft documents and written exchanges. Welsh Government looks forward to working closely with National Grid throughout the examination period and seeks to resolve outstanding issues as soon as possible in order to facilitate an efficient examination.

3 Statement of Common Ground

- 3.1.1 Welsh Government is meeting regularly with National Grid in order to progress a Statement of Common Ground. The Statement of Common Ground will set out matters to be agreed, matters where there is disagreement, and matters where there are ongoing discussions to inform the Examination.

4 Summary of Main Issues

4.1 Economic development

- 4.1.1 North Wales Connection is a significant project in North Wales and provides the potential to make a contribution to the local and regional economy. However, the potential impact on tourism and housing in the region arising from the impacts of this development, particularly when considered cumulatively with the Wylfa Newydd Nuclear Power Station project, should not be underestimated.

Tourism

- 4.1.2 Welsh Government's aim, as set out in Planning Policy Wales: Edition 9 ("PPW9") and in similar terms in the emerging Planning Policy Wales: Edition 10 ("PPW10"), is for tourism to make an increasing contribution to the economic, social and environmental well-being of Wales. The continued success of North Wales as an internationally recognised tourist destination is key to achieving this. The tourism sector is key to the economic and social well-being on Anglesey and North Wales. The Isle of Anglesey County Council (IACC) economic impact model (STEAM) estimates that Anglesey's economy alone currently benefits by some £304m annually from Tourism.
- 4.1.3 North Wales is an exceptional natural landscape. Well-visited designated landscapes in the vicinity of the development, and potentially affected by it, include the Snowdonia National Park, which lies 6km to the south of the proposed development. The North Anglesey Heritage Coast and Anglesey Area of Outstanding National Beauty, are also in the vicinity of the proposed development. Tourist attractions within the locality include Vaynol Park and Plas Newydd Grade I Registered Park.
- 4.1.4 In protecting and enhancing the tourist offer of the region, there are two primary areas of interest for the Welsh Government. Firstly we would wish to ensure that any additional demand for accommodation generated by the construction of the development, leaves sufficient available accommodation for tourists. The ES includes assessment of three different construction scenarios, each of which has a duration of 75 months, peaking between 2023 and 2024 and ending in 2026. It assumes a peak workforce of 447 workers. Given the long construction period that overlaps with that of Wylfa Newydd, Welsh Government would like reassurance that the available headroom assessed in the ES is realistic. There will be additional demand on a range of accommodation types including hotels/B&B's, camping and caravanning and the private rented sector. The ES makes assumptions about worker take-up for each accommodation type, for example that 36% of workers will use camping and caravanning which appears relatively high and is likely to have a more direct impact on tourism than other types of accommodation. Welsh Government would like to understand in more detail how National Grid has assessed the demand for each type of accommodation.
- 4.1.5 In addition to the impacts from this project, the cumulative impacts with the proposed Wylfa Newydd Nuclear Power Station project are likely to be considerable. Welsh Government has raised concerns relating to Horizon Nuclear Power's Workforce Accommodation strategy to the Wylfa Newydd Nuclear Power Station examination. Further consideration is given to this below under the Housing heading.

- 4.1.6 Secondly Welsh Government wishes to ensure that the additional traffic generated by the development has no negative impact on the capacity of the A55 Britannia Bridge, which is the main road link to Anglesey and therefore vital for tourist travel. Again the cumulative impact with Wylfa Newydd Nuclear Power Station is of concern, given that the existing congestion during peak periods is likely to be exacerbated. Further detail around the A55 is provided below under the Transport heading.

Employment and supply chain

- 4.1.7 Welsh Government welcomes benefits to local and regional employment arising from the North Wales Connection and would wish to see these maximised where possible. Whilst the Enhancement Strategy outlines that reasonable endeavours will be made to encourage support for local employment and businesses, Welsh Government would wish to see commitments translated into specific measures to be secured within the DCO.
- 4.1.8 As part of demonstrating specific measures that contribute towards a more balanced and stronger economy Welsh Government would expect National Grid to work with local stakeholders to produce a supply chain action plan. This should outline how it will proactively engage with the supply chain across north Wales to maximise regional content.

4.2 Visual Impact

- 4.2.1 Welsh Government welcomes that National Grid has carried out an extensive option selection process, including consideration of various combinations of overhead lines, sub-sea cables, and underground cables. It is also noted that consideration was given to the visual impact of other elements including the siting of compounds and modifications to sub-stations. The application documents state that a wide range of criteria were applied in reaching a decision, including environmental, socio-economic, technical and cost.
- 4.2.2 The preferred option taken forward to the DCO application comprises overhead lines between Wylfa substation and Braint Tunnel Head House on Anglesey, underground cables through the Anglesey Area of Outstanding Natural Beauty and across the Menai Strait, and a further section of overhead line between Ty Fodol Tunnel Head House and Pentir Substation in Gwynedd.
- 4.2.3 The visual impact of overhead lines can be considerable and the Welsh Government notes with concern the adverse impact this could have on local communities. The draft PPW10 states that the Welsh Government's position on new power lines is that where possible they should be laid underground, however it is recognised that a balanced view must be taken against costs, which could render otherwise acceptable projects unviable. Welsh Government considers that where undergrounding is not possible proactive engagement with energy companies and the public to mitigate the visual impact of any potential new transmission lines should take place. It is welcomed that National Grid has introduced various design measures to help mitigate that impact, including proposing underground cables through sensitive areas around the Menai Strait Area of Outstanding Natural Beauty and routing (where possible) new pylons in parallel with the existing 400Kv overhead line between Wylfa Substation and Pentir substation. It is also acknowledged that where lines run parallel the pylons will be of a steel-lattice construction and therefore in keeping with existing pylons.
- 4.2.4 Welsh Government wishes to continue to engage with National Grid, and other stakeholders (including Isle of Anglesey County Council), to ensure all visual impacts are understood and mitigated to the fullest extent possible.

4.3 Heritage

Scheduled Monuments

- 4.3.1 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.
- 4.3.2 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.
- 4.3.3 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.
- 4.3.4 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 currently understood. The assessment 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.
- 4.3.5 In general the archaeological strategy proposed in the ES is considered 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.
- 4.3.6 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 applies to the final project report and to the individual site records collected during the course of the project which should include summary information suitable for incorporation into Archwilio.
- 4.3.7 The scale of the work is such that considerable archaeological monitoring will be required. It is recommended that formal resourcing arrangements are agreed with the local planning authority and their archaeological advisors before work commences.

Registered Historic Parks and Gardens

- 4.3.8 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 avoid the use of overhead lines across the Menai Strait, which will avoid any direct impact on the grade I registered parks and gardens and their significant views. As such 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. 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.

Listed Buildings

- 4.3.9 Cadw has highlighted concerns that grade II listed buildings have been identified as only having regional importance with a medium heritage value. However, 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'.
- 4.3.10 In general, the assessment appears to consider all of the buildings that are likely to be affected and assesses them appropriately. Cadw has identified 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.

4.4 Highways and transport

Traffic

- 4.4.1 The impact of the increased volume of construction and operational traffic due to North Wales Connection is likely to exacerbate existing congestion on the trunk road network, potentially creating new areas of congestion and generally have a negative impact on road users, including response times of the emergency services. Additional congestion and the effects on journey time across the A55 Britannia Bridge is of particular concern and could have a knock-on impact on the local economy.
- 4.4.2 The cumulative impact of the North Wales Connection and the Wylfa Newydd Nuclear Power Station development is of particular concern for the Welsh Government. Representations have been submitted to the Wylfa Newydd Nuclear Power examination raising a large number of concerns and requesting further information. Issues include (but are not limited to):
- How construction workers are transported
 - Capacity of network to cope with worker and construction traffic
 - Capacity and travel patterns prior to the construction of the site campus
 - Transporting materials: Impact of road freight traffic on the network;
 - Clarification requested around the traffic model
 - Cumulative assessment
- 4.4.3 Due to the uncertainty caused by the above, Welsh Government wishes to reserve its position, and to further consider the adequacy of the transport assessment. We will continue to actively engage with National Grid to ensure that any adverse effects are appropriately mitigated.

Abnormal Indivisible Loads

- 4.4.4 Welsh Government notes that abnormal indivisible loads are likely to be transported via the trunk road network, including across the A55 Britannia Bridge. National Grid has been in discussion with Welsh Government and the North and Mid Wales Trunk Road Agent (NMWTRA) and we welcome continued engagement on this matter.
- 4.4.5 Safety is a major concern, particularly the structural integrity of the Britannia Bridge. A review of the structure will be required to ensure that the proposed loads can cross safely

and should be provided to Welsh Government before any crossings are attempted. Furthermore Welsh Government would expect to be party to a Bridge Management Strategy, and AIL Management Plan along with other key stakeholders.

Overhead Line Stringing

- 4.4.6 It is noted that there is a proposed overhead line crossing over the A55 between J7 and J7A. Welsh Government is in discussions with National Grid regarding the use of a layby at this location, the use of Temporary Traffic Regulation Orders and traffic management measures, and how netting over the A55 might be installed. It is not anticipated that these measures will cause any difficulties however Welsh Government will want to be reassured that the safe and efficient operation of the strategic road network will be maintained.

Third Menai Crossing

- 4.4.7 Welsh Government would like to draw to the attention of the Examining Authority the A55: Third Menai Crossing project. This project will introduce a new road crossing over the Menai strait. The project has recently announced a preferred route and subject to securing a Transport and Works Act Order, and final funding, has a planned start date of 2020/2021 and an opening date of late 2022/ early 2023.
- 4.4.8 The Crossing has the potential to be able to carry 400kv transmission lines within the structure. The Welsh Government is in discussion with National Grid to understand how the two projects may interact and whether National Grid could take advantage of this new piece of infrastructure.

4.5 Housing

- 4.5.1 Welsh Government is concerned about the cumulative impact of North Wales Connection and Wylfa Newydd on the housing market from those seeking accommodation) and that this will extend across the Key Socio-economic Study Area (KSA) and potentially into other parts of North Wales. The very significant accommodation demand generated by a peak 7000 non-home based workers in addition to the 447 peak workers generated by the Connection will affect a wide area of North Wales. It is of note that the Travel to Work Area assessed in the ES includes both the whole of the Isle of Anglesey and an area on the mainland within a 60 minute commute of the tunnel end in Gwynedd and the Pentir substation.
- 4.5.2 The inter-project cumulative effects have been assessed as not significant and therefore that no additional mitigation is considered necessary. The Welsh Government is concerned that despite this assessment the additional demand from the North Wales Connection over and above the demand from Wylfa Newydd Nuclear Power Station could represent a tipping point, where any detrimental impact on accommodation is exacerbated. In assessing the Wylfa Newydd application the Welsh Government has noted that the Workforce Accommodation Strategy is inadequate and could give rise to adverse effects such as:
- Pressure on the local housing stock (particularly the private rented sector, and tourist accommodation), this would adversely affect the local community and local tourist economy;
 - Reduced provision and choice of accommodation for local households at an affordable price (both first time buyers and those wishing to rent privately); and
 - Risk of displacement and homelessness within the local community (including Welsh speakers).
- 4.5.3 Further to the above, Welsh Government notes that National Grid has committed to monitor where workers are staying by type of accommodation but has not committed to report this to stakeholders. Welsh Government requests that this information is formally

reported (alongside other socio-economic markers) and that that duty to report is secured within the DCO. This reporting and monitoring approach needs to be co-ordinated with the monitoring approach for Wylfa Newydd DCO to ensure that the cumulative impacts of both projects can be identified.

4.6 Welsh Language

- 4.6.1 The Welsh Language has official status in Wales and is a material planning consideration. Both Anglesey and Gwynedd have been recognised for their high concentration of fluent Welsh speakers and communities where Welsh is the main language of communication.
- 4.6.2 The Well-being of Future Generations (Wales) Act 2015 places duties on public bodies to act in accordance with the ‘sustainable development principle. The Act establishes well-being goals which include achieving ‘a Wales of vibrant culture and thriving Welsh language’.
- 4.6.3 Welsh Government, through *Cymraeg 2050: Welsh language strategy*, is committed to increasing the number of Welsh speakers, increasing the use of Welsh, and creating favourable conditions for Welsh language and culture through strategic frameworks, programmes, and planning policy.
- 4.6.4 In the pre-application consultation response Welsh Government highlighted a concern that no Welsh Language Impact Assessment (WLIA) had been published as part of the suite of consultation documents, however a WLIA has now been provided with the application documents.
- 4.6.5 Welsh Government welcomes the measures provided to mitigate against adverse effects upon the Welsh Language, however the North Wales Connection represents an opportunity to promote and enhance the Welsh Language. We wish to engage further with National Grid to consider additional measures, such as:
- provision of bilingual signs within and outside the establishment;
 - support and funding for language induction and staff language lessons; and
 - support and funding for cultural and language initiatives;

4.7 Crown Land

- 4.7.2 Welsh Government notes from studying Part 4 of the Book of Reference that National Grid have included parcels of land belonging to Welsh Ministers, upon which they wish to either acquire all interests and rights, or, create rights, impose restrictions or acquire existing rights. Section 85 (2) and (3) of Government of Wales Act 2006 states:

“(2) References in any enactment to property vested in or held for the purposes of a government department is to be construed as including references to property vested in or held for the purposes of the Welsh Ministers, the First Minister or the Counsel General (and in relation to property so vested or held the Welsh Ministers, the First Minister or the Counsel General are each deemed to be a government department for the purposes of any enactment).”

“(3) In this section “enactment” includes a future enactment.”

- 4.7.3 Consequently, we would wish to draw the Examining Authority’s attention to the fact that under s135 of the Planning Act 2008 the developer will need to make a formal approach seeking Welsh Ministers consent for these rights.

4.7.4 Welsh Government may wish to attend any compulsory acquisition hearing, or will do so at the request of the Examining Authority.

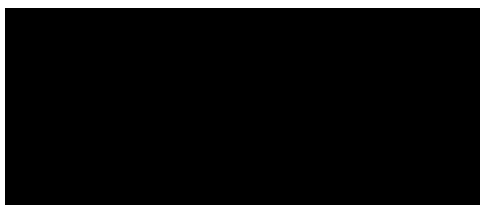
4.8 Role in Mitigation and Enhancement

4.8.1 Welsh Government notes the mitigation and enhancement measures set out within the application and the commitment to continue to liaise with landowners and stakeholders to agree bespoke works to address individual concerns. As a key stakeholder (and landowner) Welsh Government would expect to be involved in such relevant discussions.

5 Conclusion/ Expectations

5.1.1 Welsh Government intends to play an active part in the examination and where appropriate will expand upon the issues set out in this letter within our written representation.

Yours faithfully,



Andrew Slade
Director General, Economy skills and Natural Resources