

Wylfa Newydd Project A5025 On-line Highway Improvements

Planning Statement



APPLICATION November 2017

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1 Executive Summary

1.1 Introduction

1.1.1 This Planning Statement has been prepared by Horizon Nuclear Power Limited (Horizon) in support of a full planning application for the proposed A5025 On-line Highway Improvements (the Proposed Development), for submission to the Isle of Anglesey County Council (IACC) under the *Town and Country Planning Act 1990 (as amended)* (the TCPA) [RD1].

1.1.2 These improvements seek to address physical and operational constraints on the stretch of the A5025 between Valley and the proposed Power Station Access Road Junction, south of Tregele. The improvements are required in order to mitigate the predicted impacts of increased traffic associated with the construction and operation of the proposed Wylfa Newydd Project. Please refer to the glossary for the terms used in this Planning Statement.

1.1.3 The description of the Proposed Development is as follows:

“Improvements to the existing A5025 between the A5 east of Valley junction to the proposed Power Station Access Road Junction, to include reconstruction and localised widening of the existing pavement and application of a surface dressing. The proposals also comprise a Temporary Construction Compound including a temporary pavement recycling facility, and other associated works such as drainage infrastructure, boundary treatments, planting, new signage and road markings”.

1.2 The Wylfa Newydd Project

1.2.1 Horizon is proposing to construct and operate the Wylfa Newydd Project, which comprises the Wylfa Newydd Development Consent Order (DCO) Project, the Licensable Marine Activities and the Enabling Works. Each of these elements is described further below. The Licensable Marine Activities will be consented under a Marine Licence and the Wylfa Newydd DCO Project under a DCO, however there is some overlap between the two; the Marine Works (see below) will be consented under both.

Wylfa Newydd DCO Project

1.2.2 The Wylfa Newydd DCO Project comprises those parts of the Wylfa Newydd Project which are to be consented by a DCO, namely:

- Power Station: the proposed new nuclear power station, including two UK Advanced Boiling Water Reactors (UK ABWRs) to be supplied by Hitachi-GE Nuclear Energy Ltd., supporting facilities, buildings, plant and structures, and radioactive waste, spent fuel storage buildings and apparatus to transfer electrical energy to the National Grid high voltage electricity transmission network;
- Other on-site development: including landscape works and planting, drainage, surface water management systems, public access works including temporary and permanent closures and diversions of public rights of way, new Power Station Access Road and internal site roads,

car parking, construction works and activities including construction compounds and temporary parking areas, laydown areas, working areas and temporary works and structures, temporary construction viewing area, diversion of utilities, perimeter and construction fencing;

- Marine Works comprising:
 - Permanent Marine Works: the Cooling Water System, Marine Off-Loading Facility (MOLF), breakwater structures, shore protection works, surface water drainage outfalls, fish recovery and return system, fish deterrent system, navigation aids and Dredging;
 - Temporary Marine Works: temporary cofferdams, a temporary access ramp, temporary navigation aids, temporary outfalls and a temporary barge berth;
- Off-site Power Station Facilities: comprising the Alternative Emergency Control Centre (AECC), Environmental Survey Laboratory (ESL) and a Mobile Emergency Equipment Garage (MEEG);
- Associated Development: the Site Campus within the Wylfa Newydd Development Area; temporary Park and Ride facility at Dalar Hir for construction workers (Park and Ride); temporary Logistics Centre at Parc Cybi (Logistics Centre); and the A5025 Off-line Highway Improvements.

1.2.3 The following terms are used when describing the geographical areas related to the Wylfa Newydd DCO Project and the Licensable Marine Activities:

- Power Station Site – the indicative area of land and sea within which the majority of the permanent Power Station buildings, plant and structures would be located. This includes the two nuclear reactors, steam turbines, the Cooling Water System, breakwaters and the MOLF.
- Wylfa Newydd Development Area – the indicative areas of land and sea including the Power Station Site, and the surrounding areas that would be used for construction and operation of the Power Station, Marine Works and other on-site development. It would also include the Site Campus. This area is representative of the maximum area that would be physically affected by construction activities related to the Power Station and used to form the setting and landscaping features of the operational Power Station.

Licensable Marine Activities

1.2.4 The Licensable Marine Activities comprise the Permanent Marine Works, the Temporary Marine Works, the disposal of dredged material at the Disposal Site, the drainage of surface water into the sea. During construction phase this includes the construction of a waste water treatment effluent outfall, and the drainage of treated sewage into the sea.

Enabling Works

- 1.2.5 The Enabling Works comprise the Site Preparation and Clearance Proposals (SPC Proposals) and the A5025 On-line Highway Improvements.
- 1.2.6 In order to maintain flexibility in the consenting process for the Wylfa Newydd DCO Project, the SPC Proposals have also been included in the application for development consent. The A5025 On-line Highway Improvements are not part of the application for development consent.
- 1.2.7 Horizon has prepared planning applications for submission to IACC as the determining local planning authority under the TCPA for the Enabling Works.

1.3 Context

- 1.3.1 The main route to the Wylfa Newydd Development Area (WNDA) from mainland Wales and the port of Holyhead is along the A55, the A5 and the A5025. Construction of the Power Station would require very substantial transport needs for materials, large components and staff. Studies undertaken by Horizon in 2010–2011, identified that the stretch of the A5025 between Valley and the proposed Power Station Access Road Junction has physical and operational constraints in relation to its width, alignment, overtaking opportunities and surfacing condition (see chapter 2 in volume 1 of the Environmental Report for further details).
- 1.3.2 As a result of these studies Horizon has committed to improve this section of the A5025 in order to mitigate the predicted impacts of increased traffic associated with construction activities that would be undertaken at the WNDA, and from operational Power Station traffic, that would travel along this part of the highway network.
- 1.3.3 Horizon therefore intends to deliver a series of A5025 Highway Improvements between Valley and the proposed Power Station Access Road Junction as part of its wider transport strategy for the Project.
- 1.3.4 The proposed A5025 Highway Improvements have been split into two types, the A5025 On-line Highway Improvements and the A5025 Off-line Highway Improvements. The A5025 On-line Highway Improvements, the subject of this planning application, would be made to the existing road, generally within the existing highway corridor. The A5025 Off-line Highway Improvements would involve the construction of new sections of highway to bypass villages along the A5025, to reduce the effects of future traffic on existing communities, the formation of new junction arrangements, and localised improvements to existing bends. The extent and nature of the A5025 On-line Highway Improvements is therefore substantially different to the Off-line Highway Improvements.
- 1.3.5 In July 2015, Horizon made a formal request to the IACC for an Environmental Impact Assessment (EIA) Scoping Opinion for the A5025 Highway Improvements, comprising both the On-line and Off-line Highway improvements.
- 1.3.6 Following receipt of the IACC's Scoping Opinion in December 2015, a formal decision was made by Horizon to seek consent for the A5025 Highway Improvements by way of two separate planning applications. This was due to

the need for the A5025 On-line Highway Improvements to be commenced in advance of the A5025 Off-line Highway Improvements and the Main Construction of the Power Station.

- 1.3.7 Horizon accordingly reviewed the content of the A5025 Highway Improvements Scoping Report and Scoping Opinion and refined the assessment scope. Horizon made a formal request for a Screening Opinion to the IACC for the Proposed Development on 30 August 2016, to verify that the Proposed Development did not constitute EIA development. The IACC confirmed Horizon's view that the Proposed Development did not constitute EIA development on 7 October 2016. Under the 2017 Environmental Impact Assessment Regulations (Wales), Horizon consider that the Proposed Development would still not be considered EIA development.
- 1.3.8 Horizon has proceeded with the preparation of a planning application for the Proposed Development, supported by an Environmental Report, to assess the potential impacts of the Proposed Development. The Environmental Report demonstrates that with appropriate mitigation, the Proposed Development will not give rise to significant environmental effects.
- 1.3.9 The A5025 Off-line Highway Improvements do not form part of the Proposed Development. Horizon made the decision to include the A5025 Off-line Highway Improvements as part of the application for the Wylfa Newydd DCO Project, following the passing of the Wales Act 2017 [RD2] on 31 January 2017, which enables Associated Development to be consented by DCOs in Wales.

1.4 Summary of the A5025 Highway Improvements

- 1.4.1 As explained above, Horizon intends to deliver a series of On-line and Off-line improvements (collectively termed the A5025 Highway Improvements) between Valley and the proposed Power Station Access Road Junction as part of its wider transport strategy for the Project, the objectives being to:
- upgrade the route, both in terms of standard of construction and road geometry, such that it can support the increased level of construction related traffic, improve safety and improve accessibility;
 - ensure that all relevant abnormal loads can pass along the full length of the A5025;
 - reduce any potential increase in road accident risk;
 - reduce or minimise any adverse impacts on local communities;
 - reduce or minimise any adverse impacts on the environment;
 - seek opportunities where possible to achieve improvements for local communities and the environment through road design measures; and
 - to ensure that the highway improvements preserve the current character of the A5025 and take into account the rural setting of the road.
- 1.4.2 The 16.19 km stretch of the A5025 identified for improvement has been divided into eight sections for the purposes of this application:
- Section 1: A5 east of Valley junction to north of Valley Junction (A5/A5025);

- Section 2: north of Valley Junction (A5/A5025) to north of Llanynghenedl;
- Section 3: north of Llanynghenedl to north of Llanfachraeth;
- Section 4: north of Llanfachraeth to south of Llanfaethlu;
- Section 5: south of Llanfaethlu to north of Llanfaethlu;
- Section 6: north of Llanfaethlu to north of Llanrhuddlad;
- Section 7: north of Llanrhuddlad to north of Cefn Coch; and
- Section 8: north of Cefn Coch to proposed Power Station Access Road Junction.

1.5 Summary of the Proposed Development

1.5.1 The Proposed Development involves the implementation of improvements largely within the existing highway boundary of the A5025. In summary, the proposed works comprise:

- improvement of the existing pavement through the application of a surface dressing through Sections 1, 3, 5 and 7;
- reconstruction and localised widening of the existing carriageway through Sections 2, 4, 6 and 8;
- modifications and improvements to existing signage and road markings through Sections 1 to 8; and
- the construction of a Temporary Construction Compound (incorporating a temporary mobile pavement recycling facility) within Section 7, immediately adjacent to the A5025.

1.5.2 The 'pavement' referenced above relates to the surface of the road within the highway boundary, defined as materials comprising the sub-base, base course and surface course placed on a sub-grade to support the traffic load.

1.6 National Policy on Nuclear Power Generation

1.6.1 The primary planning policy relevant to NSIPs is provided by National Policy Statements (NPS). Those of key relevance to the Project are the Overarching NPS for Energy, 2011 (NPS EN-1) [RD3] and NPS for Nuclear Power Generation, 2011 (NPS EN-6) [RD4], both designated by the UK Government in 2011.

1.6.2 NPS EN-1 makes clear that the Government's key objectives in energy policy are to ensure energy security for the UK and to decarbonise energy capacity in order to meet the UK's 2050 climate change targets.

1.6.3 NPS EN-6 is the NPS for nuclear power generation and is one of a suite of technology specific NPSs that sit under the umbrella of NPS EN-1. NPS EN-6 again stresses the urgency of bringing forward new nuclear power projects as part of the drive to decarbonise the UK's electricity supply and to increase energy security.

1.6.4 Horizon considers that the Proposed Development is required in advance of the grant of a DCO to ensure the Project can be developed and delivered as soon as possible to help meet this urgent national need for new generating

capacity. A similar approach was taken in relation to the Hinkley Point C new nuclear power station application in respect of early works. Indeed, a letter from the Chief Planner of Department of Communities and Local Government (DCLG) in March 2010 entitled *Preliminary Works; Planning Act 2008 – Guidance for Local Authorities* [RD5] highlights that the then draft NPSs may be a material consideration for local authorities when determining planning applications for preliminary works. Given that draft NPSs can be material considerations, it can be inferred that published NPSs must also be material considerations.

- 1.6.5 Importantly, this letter anticipates and provides guidance for the submission of planning applications for preliminary works relating to NSIPs.

1.7 The Development Plan

- 1.7.1 The principal strategic policy documents for development in Wales are *Planning Policy Wales: Edition 9, (2016)* (PPW), [RD6], Technical Advice Notes (TANs) and the *People, Places, Futures – The Wales Spatial Plan update (2008)* [RD7], *Welsh Assembly Government, 2008*. Together these comprise the planning policy framework informing the preparation of local development plans.
- 1.7.2 The local planning policy and guidance documents are particularly relevant to this application as it will be determined in accordance with the TCPA [RD1].
- 1.7.3 The adopted development plan for Anglesey comprises the *Anglesey and Gwynedd Joint Local Development Plan, 2017* (JLDP) [RD8]. The previous development plan, which comprised *Ynys Môn Local Plan, 1996* (YMLP) [RD9] and *Gwynedd Structure Plan, 1993* (GSP) [RD10], was superseded upon the adoption of the JLDP on 31 July 2017.

1.8 The Merits of the Application

- 1.8.1 The proposed Wylfa Newydd Power Station will aid the UK in reducing its emission levels by deploying two UK Advanced Boiling Water Reactors generating a combined electrical output of approximately 2,700MW, enough power to supply five million homes.
- 1.8.2 The creation of the Wylfa Newydd Power Station would build on the long-established history of safe nuclear power generation on Anglesey, creating significant employment opportunities and injecting many million pounds per year into the economies of Anglesey and North Wales.
- 1.8.3 The Proposed Development will assist in the delivery of the Wylfa Newydd Power Station by ensuring that the road conditions are fit for purpose.
- 1.8.4 The Proposed Development includes a number of significant benefits and is appropriate in land use planning terms, in particular:
- the principle of development is acceptable and is supported by adopted planning policy;
 - the Proposed Development will address existing physical and operational constraints on the A5025 between Valley and the proposed Power Station Access Road Junction;

- the Proposed Development will mitigate the predicted impacts of increased traffic associated with the construction and operation of the Project;
- the Proposed Development has been sensitively designed to respect the scale and character of the surrounding area, and to prevent as far as possible any adverse impacts on surrounding residential amenity, ecological receptors and the setting of heritage assets. The majority of the proposed On-line Highway Improvements would take place within the existing carriageway with some widening and surface treatments, for example, surface dressing of the existing road surface and reconstructing part of the existing highway pavement;
- creation of additional jobs and encouragement of use of local employment opportunities during construction; and
- enhanced journey conditions for non-motorised users travelling along the A5025 through improved road surfacing.

1.9 Conclusion

- 1.9.1 NPS EN-1 [RD3] makes clear that the Government's key objectives in energy policy are to ensure energy security for the UK and to decarbonise energy capacity in order to meet the UK's 2050 climate change targets. NPS EN-6 [RD4] again stresses the urgency of bringing forward new nuclear power projects as part of the drive to decarbonise the UK's electricity supply and to increase energy security.
- 1.9.2 To assist in meeting this urgent need, Horizon is applying to the Secretary of State for a DCO under the *Planning Act 2008* [RD11], to construct, operate and maintain a new nuclear power station on land west of Cemaes on the Isle of Anglesey.
- 1.9.3 The A5025 On-line Highway Improvements will assist in the delivery of the Wylfa Newydd Power Station by ensuring that the road conditions are fit for purpose, and therefore assist in meeting the urgent need for new nuclear power projects.
- 1.9.4 The A5205 On-line Highway Improvements are considered to be acceptable in planning terms and are consistent with the adopted Development Plan. The Proposed Development would assist in meeting the Welsh Government and IACC's aspirations for transport improvements and they have been sensitively designed to respect the surrounding environmental and social context. Planning permission for the Proposed Development should therefore be granted.

2 Introduction

2.1 Applicant Details

2.1.1 This application has been prepared and submitted by Horizon. Horizon's ultimate parent company is Hitachi Ltd, a Japanese corporation and the parent company of the multinational Hitachi group of companies. Horizon is part of the Horizon Nuclear Power Limited group of companies, which has premises in Gloucestershire and a site office on Anglesey.

2.2 Background to Application

2.2.1 Nuclear power stations are classified as NSIPs under the *Planning Act 2008* [RD11] and therefore the Wylfa Newydd DCO Project will require a DCO under that Act.

2.2.2 It is anticipated that construction activity for the Project will take place over a period of approximately ten years. Numbers of construction workers are estimated to reach a maximum of 9,000 shift workers during peak periods.

2.2.3 The A5025 Online Highway Improvements are essential preparatory works for the Wylfa Newydd Project. It is key to the delivery programme to implement the highway improvement as early as practicable in order to mitigate the impacts of the Wylfa Newydd project on traffic and local communities and to meet the urgent national need by delivering the Wylfa Newydd Project as soon as possible.

2.2.4 The early commencement of the A5025 Online Highway Improvements will minimise any construction overlap with other aspects of the Wylfa Newydd Project (including the A5025 Offline Highway Improvements) and ensure they are in place before the volume of traffic associated with main construction reaches peak levels. Failure to start the works under a planning permission and an IACC Compulsory Purchase Order affects timely delivery of the Wylfa Newydd Project and increases the likelihood that the On-line and Off-line works will be carried out in parallel. This therefore reduces Horizon's ability to mitigate effects of the Wylfa Newydd Project (without delaying the first generation of power from Wylfa Newydd which is urgent in the national need).

2.2.5 The Proposed Development is designed to help facilitate subsequent activities which will be included within the DCO application. Whilst the Proposed Development itself is relatively limited in nature compared to later phases of the Power Station development, it is intrinsically linked to later construction phases, allowing the ingress and egress of vehicles carrying materials and construction equipment. The proposed works are also essential to facilitate access to the Power Station by servicing and maintenance vehicles once it becomes operational.

2.2.6 Local authorities' scope to consider applications for planning permission for early preparatory works on site in advance of an application for a DCO is supported by the July 2009 advice letter from the Chief Planner of the Department of Communities and Local Government (DCLG) and Chief Executive (Office of Nuclear Energy, Department of Energy and Climate

Change)¹ [RD12]. This letter provides specific guidance to authorities on planning applications for preliminary works as well as confirming the materiality of the (then) draft NPSs.

2.3 Summary of Contents of Planning Statement

2.3.1 This Planning Statement has been prepared to support this planning application for the proposed On-line Highway Improvements. Its purpose is to consider and assess the anticipated effects of the Proposed Development against relevant planning policy and guidance. It considers whether the development is, on balance, acceptable in land use planning terms to determine whether planning permission should be granted.

2.3.2 The Planning Statement is structured as follows:

- Chapter 1: Executive Summary
- Chapter 2: Introduction
 - Which sets out the application proposals, context and structure of the Planning Statement and application.
- Chapter 3: Need for the On-line Highway Improvements
 - Which explains the need for the Proposed Development.
- Chapter 4: Location and Site Description
 - Which provides a description of the site and its surroundings, including confirming relevant constraints relevant to consideration of the proposals.
- Chapter 5: The Proposed Development
 - Which provides a description of the Proposed Development.
- Chapter 6: Relevant Legislation
 - Which confirms the legislation relevant to the Proposed Development.
- Chapter 7: Planning Policy and Guidance
 - Which confirms the relevant planning policy and guidance framework which are material to the consideration of the application.
- Chapter 8: Planning Considerations and Analysis
 - Which considers the potential positive and adverse effects of the Proposed Development, makes judgement of the effects against material planning policy and balances considerations to establish whether planning permission should be granted.
- Chapter 9: Mitigation

¹ *Local Authorities' Role in New Consenting Process for Nationally Significant Infrastructure Projects*: Letter from Chief Planner (Department for Communities and Local Government) and Chief Executive (Office of Nuclear Development, Department of Energy and Climate Change) to Local Authorities, 16 July 2009.

- Which summarises required mitigation to ensure works can be undertaken in an appropriate manner and in compliance with planning policy and determines a method for securing this.
- Chapter 9: Summary and Conclusions
 - Which provides a summary of the contents of the Planning Statement.
- Chapter 10: Glossary and Abbreviations
- Chapter 11: References

2.4 Contents of Planning Application

2.4.1 This Planning Statement accompanies the planning application for the Proposed Development and should be read in conjunction with other documents which together form the planning application, listed below. The documents comprise statutory requirements for all applications or applications of this type and other documents required at a local level and those agreed following discussion with IACC:

- Planning Application Pro-Forma;
 - Which confirms the description of development, provides relevant details of the application site and proposals and provides completed land ownership and agricultural tenancy certificates.
- Site Location Plan;
 - Which confirms the extent of the application site and other land under the control of Horizon.
- Application Plans and Drawings;
 - A number of plans and drawings which collectively demonstrate the Proposed Development for which planning permission is being sought.
- Design and Access Statement;
 - Which outlines the rationale for the design approach of the Proposed Development and relevant access issues in the context of planning policy requirements.
- Environmental Report;
 - Which undertakes a review of a number of subject matters for which the Proposed Development could potentially have significant effects and identifies mitigation necessary to reduce any effects. The Environmental Report is presented in three volumes, comprising the report itself (Volume 1), supported by a series of figures and graphical material (Volume 2) and technical appendices (Volume 3).
- Summary Report of Proposed Development;
 - Which provides a non-technical summary of the Environmental Report and associated standalone reports comprising the application submission;

- Code of Construction Practice (CoCP);
 - Which outlines a series of measures and standards of work for adoption throughout the entire construction period. This will include the principles to be adopted by Horizon for the preparation of a site waste management plan, materials management plan and construction traffic management plan.
- Welsh Language Impact Assessment;
 - Which undertakes an assessment of the impact of the Proposed Development on the Welsh language and culture and identifies mitigation necessary to reduce any effects.
- Rapid Health Impact Assessment Screening Statement;
 - HIA screening was undertaken for the Proposed Development, which concluded that further assessment is not warranted. The screening exercise identifies that the potential health effects (including effects on vulnerable groups) are adequately addressed through the design and mitigation process that the HIA has informed.
- Report to Inform Habitats Regulations Assessment Screening;
- Protected and Legally Controlled Species Compliance Report;
- Flood Consequences Assessment, including Drainage Strategy;
- Water Framework Directive Compliance Assessment;
- Design Approach and Landscape Strategy; and
- Pre-application Consultation Report.
 - Which outlines how Horizon has met its statutory requirements in relation to undertaking pre-application consultation.

3 Need for the On-line Highway Improvements

3.1 Supporting the Wylfa Newydd Project

- 3.1.1 The A5025 Highway Improvements (including the Proposed Development) form an important component of the Project, and are required as part of the wider transport strategy. Should consent be granted for the Wylfa Newydd DCO Project, it would be necessary for construction traffic to use the A5025 and A5 from the A55 Junction 3 to the east of Valley to travel to the WNDA.
- 3.1.2 The Project is strongly supported by Government policy. NPS EN-1 [RD3] establishes the principles and need for new nuclear power as part of “...*the urgent need for low carbon forms of electricity to contribute to the UK’s energy mix and enhance the UK’s energy security and diversity of supply*” (para. 3.5.9, page 30). EN-1 [RD3] discusses the challenges facing the UK energy sector in relation to energy security and carbon reduction objectives.² A key issue identified is the anticipated retirement in coming years of many existing fossil-fired power stations on environmental grounds, and most nuclear plants as they reach the end of their life. Almost one quarter, or 22GW, of the UK’s generating capacity is due to close by 2018 and needs to be replaced.³ This makes the need for investment in new generating capacity urgent.⁴
- 3.1.3 NPS EN-6 [RD4] identifies the ‘Wylfa’ site as potentially suitable for the deployment of a new nuclear power station, based on the conclusions of the UK Government’s Strategic Siting Assessment.
- 3.1.4 To address the urgent need for new generating capacity, EN-6 [RD4] also emphasises that new nuclear power stations need to start generating as soon as possible, with the intention that they should be brought online before 2025.

3.2 Existing Road Condition

- 3.2.1 Whilst the On-line Highway Improvements are required to facilitate the Project, the current condition of the road is substandard. Details confirmed in the Scheme Assessment Report 2 and Stage One Road Safety Audit indicate that the A5025 between Valley and the proposed Power Station Access Road Junction does not meet current highway standards and needs improving outside of the WNDA. The existing route has issues in relation to its width, alignment and overtaking opportunities, which currently affect the movement of traffic along the road.
- 3.2.2 The A5025 follows a winding course with a number of sharp bends, and in some places, the route passes through rural communities where it is closely flanked by residential properties and other structures.
- 3.2.3 A range of data sources (such as Ordnance Survey mapping and site based observations) have been used to obtain information relating to the current use and conditions of the highway network between Valley and the proposed Power Station Access Road Junction (the extents of which are depicted in figures 2-3 – 2-23 in volume 2 of the Environmental Report), and to inform the

² Paragraphs 3.3.2 – 3.3.6, EN-1 [RD3]

³ Paragraph 2.2.16, EN-1 [RD3]

⁴ Paragraph 3.3.15, EN-1 [RD3]

assessment of potential adverse and beneficial effects of the Proposed Development (as explained in chapter 6 in volume 1 of the Environmental Report).

- 3.2.4 The existing carriageway width is generally under the 7.3m standard width along its length and has tight bends, some of which are unsuitable for Heavy Goods Vehicles (HGVs) to safely negotiate.
- 3.2.5 The existing A5025 between Valley and the proposed Power Station Access Road Junction also has physical and operational constraints in relation to its:
- visibility and overtaking – only two sections of the route have adequate overtaking opportunities, due to limited forward visibility;
 - speeds – vehicle speeds vary between the national speed limit on roads outside of communities, to 30mph (48kph) within communities;
 - user-group conflicts – restricted road space and limited non-motorised user (NMU) provisions frequently bring vehicle travellers into conflict with pedestrians and cyclists;
 - accident risk – slight, serious and fatal accidents have been recorded along different parts of the road over the last 10 years; and
 - road surface condition – the pavement is in a poor condition with limited operational lifespan remaining.
- 3.2.6 Strategic transport studies commissioned by Horizon and the IACC (see section 2.5 in volume 1 of the Environmental Report) have identified that the route would need to accommodate additional traffic associated with the delivery and movement of plant, bulk materials, HGVs and workers related to the construction works at the WNDA.
- 3.2.7 Whilst Wylfa Newydd is the trigger for improvements to the A5025 to be made, it is acknowledged that there is also a wider public benefit to the proposed works being undertaken as it is recognised that the current condition of the A5025 is substandard. An improved A5025 would help to meet various transport, economic and planning policies such as:
1. Transport
 - (i) Welsh Government Priorities (Programme for Government 2011) [RD13]
 - a. “sustainable economic growth”
 - (ii) National Transport Plan 2015 [RD15]
 - (iii) North Wales Joint Local Transport Plan 2015 (JLTP) [RD14]
 - a. Key transport issues (page 16);
 - b. Local transport plan outcomes (page 39); and
 - c. Higher level interventions (specific reference to A5025).
 2. Economic
 - (i) Anglesey Enterprise Zone
 - (ii) *Energy Island Programme: The Energy Island Programme’s Communications Strategy, 2013* [RD16]

- a. "Support low carbon energy developments – helping to modernise infrastructure such as [...] transport links and roads" (page 1).

3. Planning

(i) JLDP [RD8]

- a. Vision;
- b. Strategic objectives (S03, S04 and in support of SO9); and
- c. Strategic Policies (e.g. PS4, TRA1).

- 3.2.8 Importantly, Highway improvements to the A5025 are supported by the adopted JLDP [RD8] and the accompanying Proposals Map 1, which designates 'A5025 Improvement Areas'. In addition, the New Nuclear Build at Wylfa Supplementary Planning Guidance 2014 (the Wylfa SPG) [RD17] states in Paragraph 4.6.7 that key junctions and sections of carriageway may need improving to cope with peak traffic flows (these include sections of the A5025 and Junction 3 (A55/A5 junction)).
- 3.2.9 The *North Wales Joint Local Transport Plan, 2015* [RD15] aims to improve connections to key destinations and markets, enhance access to employment and services, increase levels of walking and cycling, improve safety and security and at the same time bring benefits and minimise impacts on the environment. Table 6.4 of the JLTP [RD15] confirms that A5025 Valley to Amlwch improvement works in preparation for the construction of Wylfa Newydd are a regional priority project.
- 3.2.10 Horizon accordingly plans to improve the route as part of the Project. Without improvement, increases in traffic could result in further road deterioration, increased delays for road users, potentially increased accident risk and nuisance for local communities along the route.

4 Location and Site Description

4.1 Application Site

- 4.1.1 The A5025 is a principal transportation route on the Isle of Anglesey, distributing traffic around the western, northern and eastern parts of the island. The route connects the northern Anglesey coast and villages in western and northern Anglesey to the A55 at two points, one in the northwest of the island, and one in the south-east of the island at the Menai Bridge.
- 4.1.2 The A5025 forms the main access route to the Existing Power Station on the northern coast line near Tregele, and provides access to a number of small villages and scattered rural properties dispersed across agricultural land.
- 4.1.3 Anglesey has been recognised for its high concentration of fluent Welsh speakers in the *Welsh Language Use Survey 2013-15 (Welsh Government and Language Commissioner, 2015)* [RD18]. It is recognised as one of the Welsh-speaking heartlands in Wales and includes the second highest proportion of Welsh speakers throughout Wales. The Welsh language is a part of everyday life within Anglesey, as it is the language of many families at home, the language of schools and is used in local shops, pubs, banks, health facilities, in the workplace and during community activities. In addition, a Welsh Language Charter is currently in action in all primary schools on Anglesey and its aim is to promote children's social use of the Welsh language, to encourage and compel children to speak Welsh.
- 4.1.4 Section 4.5 of the Wylfa SPG [RD17] confirms that the 2011 Census showed that approximately 57.2% of people in Anglesey speak Welsh which is substantially greater than the average across Wales. The Proposed Development is located across the three wards of Valley, Llanfaethlu and Mechell. The WLIA submitted in support of this planning application shows that an average of 60.7% of people aged three and over living within these wards spoke Welsh in 2011.
- 4.1.5 The whole Anglesey coastline and hinterland, extending inland to several kilometres in parts, is designated as an Area of Outstanding Natural Beauty (AONB). In places, the AONB boundary is formed by the A5025, in particular to the west of Sections 2 and 6.
- 4.1.6 The local landscape surrounding the A5025 is of high quality and differing character, and mainly comprises rolling pastoral agricultural land. *The Review of Special Landscape Areas (SLA) in Gwynedd and Anglesey (Land Use Consultants, 2012)* [RD19] identified six proposed SLAs on Anglesey intended to replace the previous island-wide SLA designation excluding the Isle of Anglesey AONB. Following the adoption of the JLDP [RD8] these six SLA designations came into force, superseding the previous island-wide SLA. Of these six new SLAs, the nearest to the A5025 is the Mynydd Mechell SLA which lies approximately 1km east of Cefn Coch.
- 4.1.7 Much of the A5025 is lined by grass verges bordered by a mixture of hedgerows and trees, fences, stone walls and cloddiau (stone-faced earth banks). Ancient woodland is located in close proximity to the highway corridor near the small settlement of Cefn Coch.

- 4.1.8 A range of archaeological and cultural heritage assets of varying historic significance have been recorded in the area surrounding the A5025, the most important of which comprise a Scheduled Ancient Monument (Capel Soar Standing Stone), Listed Buildings, and Registered Parks and Gardens. Historically, the landscapes surrounding the A5025 predominantly date to the post-medieval period.
- 4.1.9 Three European Designated Sites are located within 2km of the A5025, comprising Anglesey Terns Special Protection Area (SPA); Cemlyn Bay Special Area of Conservation (SAC); and Llyn Dinam SAC. Nationally designated ecological conservation sites within 500m of the A5025 comprise: Beddmanarch-Cymyran Site of Special Scientific Interest (SSSI); Llyn Llygeirian SSSI; Cae Gwyn SSSI; Llyn Garreg-Lwyd SSSI; and Tre'r Gof SSSI.
- 4.1.10 The main surface water bodies crossed by, or located in proximity to, the A5025, comprise the Afon Cleifiog, Afon Alaw, Tan R'Allt, Afon Cafnan and several small watercourses and ditches.
- 4.1.11 Agricultural soils of varying quality and type have been recorded along and surrounding the A5025.
- 4.1.12 Monitoring undertaken by Horizon indicates that background noise is dominated by traffic noise from vehicles travelling along the A5025, with additional contributions from traffic on local roads and agricultural and environmental noise sources.
- 4.1.13 Air quality in the area surrounding the A5025 is generally good, with low levels of pollution and dust recorded.
- 4.1.14 A more detailed description of each Section of the Proposed Development is provided below. Figure 4-1 and 4-2 below illustrate the key environmental features in Sections 1-8 of the A5025.

Figure 4-1 Environmental features along the A5025 Sections 1-4

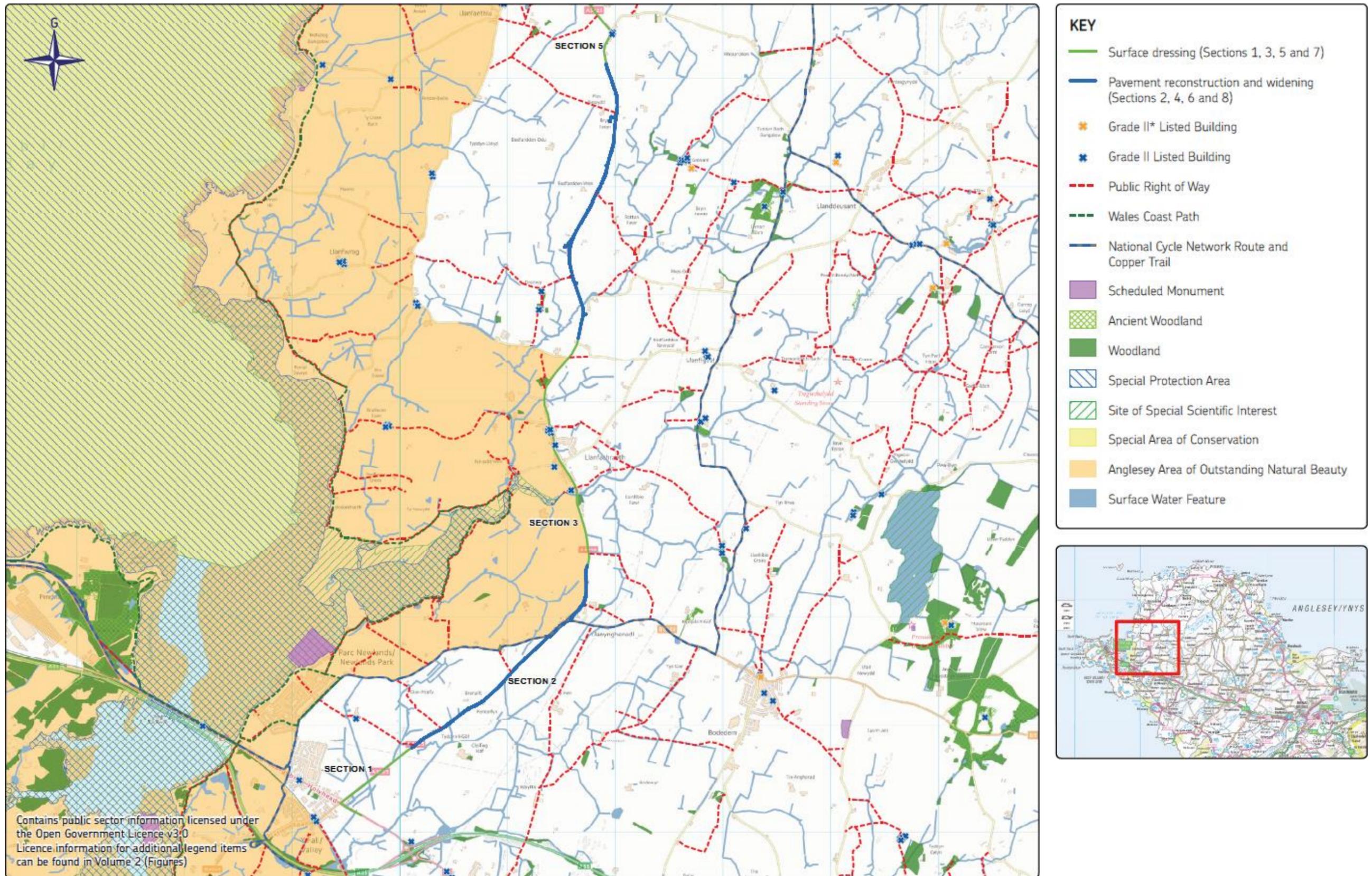
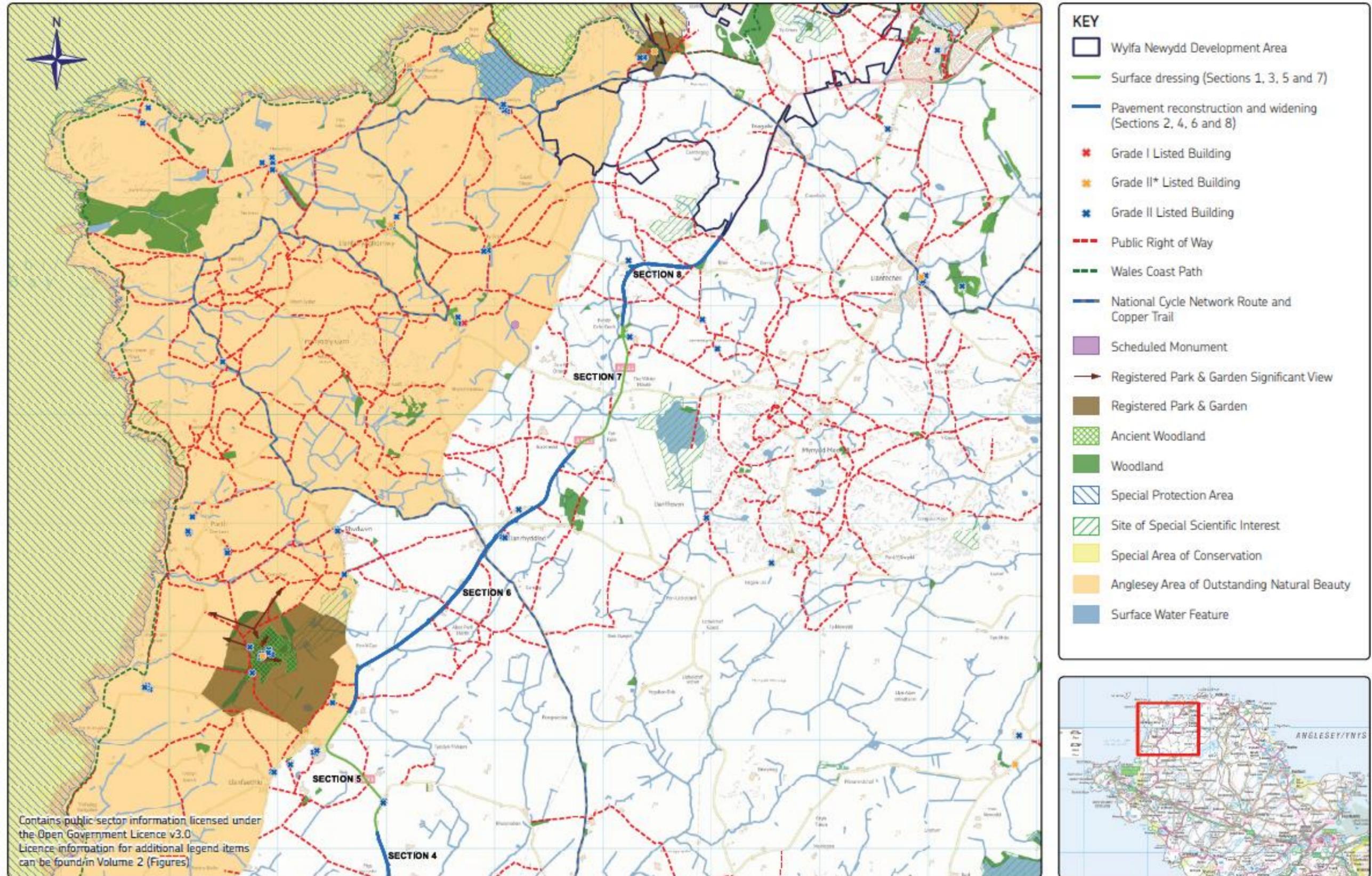


Figure 4-2 Environmental features along the A5025 Sections 5-8



Section 1 – A5 east of Valley junction to north of Valley Junction (A5/A5025)

- 4.1.15 The section of the A5 west of the A55 junction is 1.06km long and is a single carriageway highway with a relatively straight alignment and approximately 7.0 metre wide carriageway with a 2.0m hard strip north and a 2.0m footway south for the majority of the highway. Either side of the carriageway are grass verges and low stone walls. Approximately 250 metres from the existing Valley junction there are lighting columns present on the north side of the carriageway and the remaining link to Junction 3 of the A55 is unlit.
- 4.1.16 There are a number of Private Means of Accesses (PMAs) on the A5 between Junction 3 of the A55 and the Valley junction with the A5025. These are predominantly agricultural accesses to land to the north and south of the A5. There is also an access to the Valley rail head on the southern side of the carriageway approximately 320 metres from the Valley junction and there is also a small junction for accessing a cemetery north of the A5. All existing junctions along this section are simple T-junctions.
- 4.1.17 At the Valley junction a 4-arm signal-controlled intersection links the A5, A5025 and B4545. This junction operates a simple two-stage sequence. The timings appear to be vehicle actuated, whereby the green times are allocated based on demand rather than on a fixed time plan. The junction has a single lane per approach, with the exception of the A5025 arm which has a dedicated left turn lane and an ahead/right turn lane. The junction has a relatively small footprint and no formal pedestrian crossing facilities are provided.
- 4.1.18 Bordering the junction is a number of residential and commercial properties at the back of the footways and therefore limited opportunity to expand the junction footprint locally.
- 4.1.19 Valley itself is a large village located at the western end of the A5025. The village offers several important facilities and services including a primary school, a doctor's surgery, a dental practice, a pharmacy, several shops, restaurants, places of worship, a cemetery, a train station, a post office, petrol filling/service stations, vehicle repair garages, and recreational facilities associated with Parc Mwd, including a green football area, a playground and woodland. There is some provision of Welsh medium social opportunities within the village e.g. Yr Urdd, Merched y Wawr, youth clubs, Cylch Meithrin and Clwb y Cob.
- 4.1.20 Valley has a lower proportion of Welsh speakers than Anglesey as a whole. The percentage of Valley's population born outside Wales who speaks Welsh is slightly lower (16.9%) than on Anglesey (17.6%). Ysgol Gynradd Y Fali (Y Fali) provides Welsh medium education for children aged between 3 and 8 years old; however, Y Fali has a low rate of households where children use the Welsh language [RD20].

Section 2 – North of Valley Junction A5 / A5025 to North of Llanyghenedl

- 4.1.21 This section of the route is a 2.46km long rural area surrounded by agricultural land. There are a small number of residential properties at the road side and the village of Llanyghenedl is located towards the northern extent of this

section. The village is a small settlement of approximately 20 residential and no commercial properties.

- 4.1.22 The A5025 throughout this section is of a relatively straight alignment from the Valley junction until the southern extents of Llanynghendl. The national speed limit applies along this section of the A5025 until approximately 300m south of the village where it drops to 40mph (64kph) and continues at this limit until around 350m north of the village.
- 4.1.23 The highway throughout this section is a single carriageway with grass verges on either side with either low stone walls or hedgerows at the back of the verge. There are signs of carriageway repair works at the edges suggesting there has been pavement failure along this section. Where residential properties are present on this section they are either set far back from or located within 3m of the carriageway edge. There are a number of PMAs to the fields either side of the highway which include some larger accesses to farms located away from the main highway.
- 4.1.24 Llanynghenedl itself is a hamlet located between Valley and Llanfachraeth, along the A5025. There are no local facilities within the hamlet and therefore the residents rely on other facilities and services located along the A5025 for their eve-ryday needs. Llanynghenedl is located within the ward and community council area of Valley as defined in the 2011 Census.
- 4.1.25 In Llanynghendl the B5109 meets with the A5025 and there are currently two junctions forming this link between them. The main junction is a 3-arm priority controlled junction, with the A5025 forming the major arm and the B5109 the minor. There is also a smaller junction about 200m north of the major junction and a smaller priority controlled junction that connects the B5109 indirectly with the A5025 through a small residential area.
- 4.1.26 In a number of locations along Section 2 there are overhead low voltage and 11kV electricity cables and telegraph poles present at the back of verge. These poles are generally only run along one side of the carriageway but at some points traverse the highway corridor.
- 4.1.27 The carriageway markings along this section vary between permitting overtaking in both directions, a single direction or specifying no overtaking. Prohibition on overtaking is due to the route passing through small residential settlements and limited forward visibility along sections of the highway.
- 4.1.28 Two attenuation ponds would be created in Section 2 to attenuate and control the discharge of highway runoff into nearby watercourses (see figure 2-4 within volume 2 of the Environmental Report). Both attenuation ponds would be accessible directly from the A5025 to permit future maintenance and inspection, and would be contained by fencing for safety reasons.

Section 3 – North of Llanynghenedl to North of Llanfachraeth

- 4.1.29 This 2.28km section of the A5025 has both urban and rural characteristics. Llanfachraeth is a large village and the A5025 in this area has an urban character with a high density of residential properties, small businesses and a school. The sections of the A5025 to the north and south of Llanfachraeth are more rural in nature with agricultural land uses either side of the highway corridor.

- 4.1.30 The section of the A5025 north and south of the village has a typical rural carriageway with grassed verges and low stone walls on either side. Approximately 200m from the start of the village the speed limit drops from the national speed limit to 30mph (48kph). At this point a footway and street lighting columns are introduced on either side of the carriageway. These footways continue through the village and vary in width depending on the presence of street furniture and walls.
- 4.1.31 In the centre of the village, the residential properties are closely spaced and near to the edge of the carriageway. Some off-street parking is provided within the village with dropped kerbs to allow vehicular access to the highway. There are some older properties where the frontage is directly adjacent to the footway with no front gardens with the result that there is a significant amount of on-street parking. This effectively reduces the carriageway width and requires vehicles to give way to oncoming traffic in order to allow them to pass parked cars.
- 4.1.32 There are a number of small T-junctions within Llanfachraeth village with the priority being the A5025 and a large number of closely spaced PMAs.
- 4.1.33 Llanfachraeth contains some local facilities, including a village hall, convenience store, post office, country store, public house, places of worship and green spaces. The local primary school, Ysgol Gynradd Llanfachraeth closed in summer 2017, with pupils transferred to a new primary school in Llanfaethlu – Ysgol Rhyd y Llan.
- 4.1.34 The Holland hotel and Capel Abarim are also located close to the A5025 in this section.
- 4.1.35 Many of the residents and facilities have direct access to the A5025. The A5025 is important to the interconnectivity of the village, as the population relies on services in other locations e.g. Valley and Holyhead.
- 4.1.36 Llanfachraeth has a higher proportion of Welsh speakers than Anglesey as a whole. The percentage of Llanfachraeth's population born outside Wales who speaks Welsh is slightly higher (18.5%) than on Anglesey as a whole (17.6%).

Section 4 – North of Llanfachraeth to South of Llanfaethlu

- 4.1.37 Once the A5025 has passed through Llanfachraeth it again becomes rural in nature with agricultural land uses on either side of the carriageway. There are a very small number of residential properties along this 2.7km section of the route.
- 4.1.38 This section of the A5025 has a number of large radius bends but has a generally straight alignment. The road corridor is typically rural with grassed verges and vegetation, low stone walls or stock-proof fencing on either side of the carriageway. Some of the vegetation is quite dense in places and is very close to the carriageway edge.
- 4.1.39 A 50mph (80kph) speed limit applies along most of this section until the approach to Llanfaethlu village where the speed lowers to 40mph (64kph). There are road markings to indicate that overtaking is permitted for approximately the first 500m in both directions due to suitable forward visibility

however, from this point double solid white lining prohibits any overtaking for the remainder of this section of the highway.

- 4.1.40 Along this part of the A5025 all junctions are simple T-junctions where the side roads give priority to the A5025. A number of residential and agricultural PMAs are present in the final stretch on both sides of the carriageway.
- 4.1.41 In the final section, there is a number of low voltage overhead power cables traversing the highway near to a number of residential properties in the area, with the poles located close to the back of the footway. At regular intervals along this stretch of highway there are four 11kV cables crossing the highway overhead.

Section 5 – South of Llanfaethlu to North of Llanfaethlu

- 4.1.42 The 1.43km stretch of the A5025 through the settlement of Llanfaethlu is predominantly rural and accommodates approximately 40 properties. Outside of these settlements there are a number of PMAs to agricultural and residential properties. There is a chapel and a derelict public house adjacent to the first sharp bend through this stretch of highway.
- 4.1.43 This section of the highway is predominantly straight however there are two sharp small radius bends along the route. The first of these bends is a 90 degree downhill left turn (traveling south to north) towards Llanfaethlu. The road markings permit northbound overtaking immediately after this bend and a further 100m north of here overtaking is permitted in both directions.
- 4.1.44 Between the two sharp bends the alignment is relatively straight with a typical grassed verge and small stone walls along the carriageway edge. The speed limit drops from 50mph (80kph) to 40 mph (64kph) around 150m from Llanfaethlu and this point also introduces road markings to prohibit any overtaking in the northbound direction. A further 100m from here there is no overtaking permitted in either direction.
- 4.1.45 The second sharp bend along the route is located within Llanfaethlu village. On this bend there are two side road priority controlled junction whereby the A5025 takes priority. They are both T-junction arrangements and provide access to residential properties within the area.
- 4.1.46 After the second T-junction the carriageway is a long straight downhill gradient (northbound) out of Llanfaethlu. Due to this straight alignment, overtaking permission is reintroduced in both directions and a service road runs parallel to a 150m section of the eastern side of the A5025 providing access to a number of residential properties and fields.
- 4.1.47 Llanfaethlu itself is a small village located between Llanfachraeth and Llanrhuddlad, along the A5025. The village contains some local facilities, including a village hall, coffee house, local store and post office, a public house with bed and breakfast accommodation, places of worship, a local producer of traditional Welsh liqueurs, campsite and recreational facilities at Llanfaethlu Park. Ysgol Ffrwd Win closed in summer 2017 with pupils transferred to a new primary school in Llanfaethlu – Ysgol Rhyd y Llan.
- 4.1.48 The residents of Llanfaethlu rely on other facilities and services located along the A5025 for their everyday needs.

- 4.1.49 Llanfaethlu has a higher proportion of Welsh speakers than Anglesey as a whole. The proportion of Llanfaethlu's population born outside Wales who speaks Welsh is higher (19.0%) than on Anglesey as a whole (17.6%).

Section 6 – North of Llanfaethlu to North of Llanrhuuddlad

- 4.1.50 This section of the A5025 is 3.36km in length and is primarily rural with small settlements along the route with open agricultural land on both sides of the highway. The south end of this stretch is a more built up area with a number of residential and commercial properties. At the northern end of this section is the village of Llanrhuuddlad which accommodates around 30 residential properties. The majority of residential properties in this stretch are not located directly adjacent to the carriageway and are on side roads or setback from the highway.
- 4.1.51 Llanrhuuddlad is a small village located to the north of Llanfaethlu, along the A5025. The village contains limited local facilities, including a places of worship. Ysgol Gymuned Cylch y Garn closed in summer 2017 with pupils transferred to a new primary school in Llanfaethlu – Ysgol Rhyd y Llan.
- 4.1.52 The residents of Llanrhuuddlad rely on other facilities and services located along the A5025 for their everyday needs.
- 4.1.53 Llanrhuuddlad has a higher proportion of Welsh speakers than Anglesey as a whole. The percentage of Llanrhuuddlad's population born outside Wales who speaks Welsh is significantly higher (22.8%) than on Anglesey (17.6%), which suggests that a slightly higher percentage of newcomers choose to learn Welsh than on average.
- 4.1.54 The southern end of this section of the A5025 has a short built up area where overtaking is prohibited in both directions. No overtaking is permitted until approximately 500m north of this area, once the highway has passed around a slightly sharp right hand bend (northbound). There is a T-junction on the crest of this bend leading to the hamlet of Rhydwyn, where the A5025 takes priority.
- 4.1.55 After a small section of northbound-only overtaking, the carriageway alignment then straightens out at the point where overtaking is permitted in either direction. This section is a relatively steep downhill gradient (south to north) with a few isolated properties either side but has a more rural feel than the area south of the sharp bend. The carriageway is surrounded by open fields and confined by grassed verges and low hedgerows.
- 4.1.56 The alignment is predominantly straight for the remainder of this section and the speed limit transfers from 40mph (64kph) to the national speed limit approximately 400m north of the junction to Rhydwyn. Around this point the road continues up a slight incline (south to north) into the village of Llanfaethlu, and along this stretch low voltage overhead power lines cross the highway at numerous locations.
- 4.1.57 Around 100m outside of the village there is a priority controlled junction to the east where double white lines are introduced to prohibit any overtaking in either direction. It is at this point that the environment becomes much more built up and residential properties are located directly adjacent to the highway in places. There is a service road on the west side of the carriageway to provide

access to residential properties and a bus layby in the central section of the village.

- 4.1.58 Throughout most of the village, overtaking is permitted in the northbound direction only; however, at the northern end of the service road, overtaking is permitted in both directions for the next 250m. At this point, there are 11kV overhead power cables traversing the highway and the road has a downhill gradient (south to north).
- 4.1.59 On the exit to the village overtaking is permitted for southbound traffic only initially and then prohibited in either direction as the carriageway travels around a relatively sharp bend.

Section 7 – North of Llanrhyddlad to North of Cefn Coch

- 4.1.60 This section of the route is a 1.3km long rural area surrounded by agricultural land. There are a small number of residential properties set back from the highway and a number of agricultural accesses to fields directly from the highway.
- 4.1.61 The road corridor is typically rural with grassed verges either side of the carriageway with a combination of stock-proof fencing, low stone walls and hedgerows bounding the adopted highway extents.
- 4.1.62 On the approach to the first bend in this section, road markings prohibit overtaking in both directions due to poor forward horizontal and vertical visibility. In this area, there is a quite steep downhill gradient and the turns become more onerous. The roadside hedgerows are higher and denser as well as being closer to the back of the verge. There is an unnamed side road that joins the carriageway via a priority controlled junction on the crest of the curve.
- 4.1.63 After this junction, the carriageway gradient starts to rise again (south to north) and the vegetation becomes less dense on the east side. Approximately 150m to the north of the junction, overtaking is permitted in a northbound direction. A distance of 50m after this, overtaking is permitted in both directions for a short section, before being prohibited again in a northbound direction on the approach to the crest of the hill. Once the highway reaches the crest of the hill, overtaking is prohibited in both directions.
- 4.1.64 There is a priority controlled crossroads at the top of the hill which allows access to the un-named side roads to Llanfairynghornwy to the west and Llanfechell to the east. Due to the junction being on the hill crest there is limited vertical visibility from the side roads at the junction in both the north and south direction.
- 4.1.65 11kV power cables traverse the carriageway at the junction and poles are located close to the carriageway edge. A further set of power cables cross the route approximately 50m to the north of the cross roads. A 132kV extra high voltage power line spans the alignment in this area with pylons carrying cables directly from the Existing Power Station. The nearest pylon to the highway is set back approximately 10m to the east of the carriageway.
- 4.1.66 North of this point the carriageway runs downhill in a straight alignment, and northbound overtaking is permitted. The carriageway begins to climb again on

the approach to the second bend in this section of the highway. The overtaking provisions change to allow southbound overtaking only, but on the bend there are no provisions for overtaking in either direction. The second bend has a large radius and is followed shortly by another large radius bend and therefore no overtaking is permitted along this stretch. The alignment gradient falls downhill from the apex of the second bend in this section and passes the hamlet of Cefn Coch.

- 4.1.67 The carriageway is bounded by dense vegetation on both sides along this section and there are a number of overhead 11kV power cables and a 132kV cable that traverse the road corridor.

Section 8 – North of Cefn Coch to Proposed Power Station Access Road Junction

- 4.1.68 The final section of the A5025 discussed in this report is 1.6km in length and can be split into two distinct parts. The first has two large radius bends on steep gradients and the second is significantly straighter highway with a much lower gradient. The road continues to be rural in nature along this stretch with a number of isolated settlements and residential properties along the route.
- 4.1.69 The first part of this section is a kilometre stretch containing two large radius bends with a short straight section between them. The second part is a significantly straighter alignment on the approach to Tregel and the existing access road to Wylfa. There are no overtaking provisions along the majority of the first part due to poor forward visibility in this area.
- 4.1.70 There are two T-junctions on the first bend which both lead to Nanner Road and a number of PMAs on either side of the highway. There is also a layby on either side of the carriageway to offer a point of refuge for both northbound and southbound traffic.
- 4.1.71 On the exit to the second bend, as the alignment straightens, overtaking is permitted for approximately the first 500m in the northbound direction initially and then 500m in the southbound direction. On the approach to Tregel overtaking is permitted in either direction however as the speed limit changes from the national speed limit to 40mph (64kph) about 250m south of the existing Wylfa access junction, overtaking is prohibited due to the area being more built up and containing a number of residential and commercial properties.
- 4.1.72 In this area, the highway environment has more of an urban feel. A petrol station is located on the west side of the carriageway adjacent to the priority junction with Garnedd Cae. A series of low voltage power lines run in parallel and traverse the highway in Tregel.
- 4.1.73 Approximately 100m north of the junction with Garnedd Cae there is a staggered crossroad junction accessing an unnamed road to the east and west. Once past the Douglas Inn the residential area finishes and the environment is once again more rural. Overtaking is then permitted in a northbound direction for 50m and then, southbound overtaking is also permitted. At this point an 11kV power line crosses the route, before the route passes under the main transmission 132kV power line, with the pylon located approximately 30m to the west of the carriageway.

- 4.1.74 Directly beneath the 11kV overhead power lines a further side road joins the carriageway via T-junction. Adjacent to this junction, overtaking is prohibited in a northbound direction. The carriageway then passes the existing Wylfa access road which forms a priority controlled junction with the A5025. To the immediate south of the site access junction, street lighting begins with lighting columns present on both sides of the carriageway.

5 The Proposed Development

- 5.1.1 This section of the Planning Statement provides a summary description of the Proposed Development.
- 5.1.2 The section of carriageway associated with the Proposed Development is approximately 16.19km long and commences at the A5 east of Valley junction, as far as the proposed Power Station Access Road Junction, south of Tregle.
- 5.1.3 The Proposed Development has sought to preserve the current character of the road and take into account the rural setting of the road.

5.2 Overview of improvements within Sections 1, 3, 5 and 7

- 5.2.1 Works involving the application of surface dressing to the existing pavement would be undertaken within Sections 1, 3, 5 and 7, under traffic management conditions.
- 5.2.2 Surface dressing would be applied through the laying of a bitumen binder followed by the application of chippings to improve skid resistance. Road markings would then be applied, and existing signage would be replaced where necessary.
- 5.2.3 No changes would be made to existing drainage regimes, junctions, accessibility, boundary treatments or landscaping, and no permanent landtake or earthworks would be required to implement the surface dressing.
- 5.2.4 A Temporary Construction Compound (including a temporary pavement recycling facility) would handle and process highway arisings to be re-used in the construction of the new road surface. The Temporary Construction Compound would be used for site offices, construction staff parking, potential short-term parking of plant when not in use or awaiting transport off-site, and for welfare facilities. The proposed location for this plant is within a site at Cefn Coch (Section 7). The site is approximately 7,660m² in size and is located 1.1km north of Llanrhuuddlad. Please see the application plans for further details.
- 5.2.5 This site was selected as the most appropriate as it is located close to the A5025 and within a designated A5025 Improvement Area in the JLDP [RD8]. Strategic Policies PS4 and Policy TRA1 [RD8] are of relevance. These policies confirm that improvements to the strategic transportation network, including transport infrastructure improvements associated with new nuclear development at Wylfa Newydd, will be secured in such areas. The land is available for use by Horizon as the Temporary Construction Compound and the location of it would have limited noise impacts and impact on existing landscape features and character. No designated ecological or heritage features have been identified on the site or in the surrounding area which would be significantly affected.
- 5.2.6 The Temporary Construction Compound would be accessed via a new temporary access from the A5025 to allow construction vehicles to enter and leave the site. This would be located on the eastern boundary of the compound. A second access would be created at the northern boundary of

the Temporary Construction Compound, off an existing side road from the A5025, which would only be used by site office vehicles. An area of temporary hardstanding would be formed at the entrance to this access.

5.2.7 Equipment, materials and facilities within the Temporary Construction Compound are likely to comprise:

- perimeter fencing;
- site offices comprising portable cabins stacked no greater than two units high;
- power generator;
- construction staff parking bays;
- storage and management of waste (including a cess pit and portable toilets);
- storage of fuels (diesel) and lubricants;
- storage of construction materials and water;
- potential short-term parking of plant when not in use or awaiting transport off-site;
- staff welfare facilities; and
- temporary mobile pavement recycling facility.

5.2.8 Mobile plant within the Temporary Construction Compound would be used to handle and process highway arisings obtained from the existing pavement.

5.2.9 An indicative layout for the Temporary Construction Compound in Section 7 has been developed to inform the environmental consideration of the Proposed Development (see figure 2-23 in volume 2 of Environmental Report). This has taken into account the types of equipment and operation that would be undertaken, the relationship of the site to the surrounding environment and existing constraints e.g. overhead electricity transmission lines.

5.2.10 Wooden hoarding (fencing) of a height no greater than 2.4m would be installed around the perimeter of the site to provide containment of the operations, site security and visually screen activities. This hoarding would also be used to segregate the site offices and parking facilities from the adjacent processing operations, and would be finished in a green tone to assist visual integration with the local environment.

5.2.11 The Temporary Construction Compound would be fitted with temporary lighting. Lighting columns would be fitted around the perimeter of the site and to the site offices, and would be of a height no greater than five metres to minimise light spill during periods of darkness.

5.3 Overview of improvements within Sections 2, 4, 6 and 8

5.3.1 Reconstruction and widening of the existing pavement would be undertaken within Sections 2, 4, 6 and 8.

5.3.2 The improvements have been designed to follow the existing horizontal and vertical alignment of the existing carriageway wherever possible. Widening

- would be undertaken to provide a minimum cross-section (width) of 7.3m, comprising a carriageway width of 6.7m and a 0.3m wide hardstrip on either side of the paved area. Additional widening would be provided on some existing bends to enable HGVs to pass safely.
- 5.3.3 A minimum 450mm verge width would be provided within the existing highway boundary on either side of the road, where possible. Where this is not achievable, widening outside the existing highway boundary would be necessary.
- 5.3.4 Widening beyond the highway boundary would require small amounts of land to be taken permanently, with boundaries reinstated in new positions. In locations where widening outside the highway boundary is required and it is deemed practical, a 700mm minimum verge width would be provided.
- 5.3.5 Approximately 250m of new carriageway would be constructed immediately east of the existing carriageway at Bytheicws (Section 4), extending approximately 40m into the adjacent field at its furthest point, in order to improve an existing sharp bend at this specific location.
- 5.3.6 A speed limit of 60mph (97kph) has been assumed throughout Sections 2, 4, 6 and 8, except through settlements and villages, where speed restrictions would apply for safety reasons. Reduced speed limits would also be recommended in locations where pedestrian and cycling crossing points are proposed, in consultation and agreement with the IACC.
- 5.3.7 Drainage has been designed to address the minor increase in impermeable areas associated with widening. This has been developed on the principle that any new infrastructure matches the existing system, wherever possible, with new drainage components installed as required.
- 5.3.8 Modifications would be made to a number of existing PMA arrangements and junctions affected by widening, with the radius of some bends modified to improve safety and forward visibility. Boundary treatments, walls and hedges would be aligned to provide better visibility. Improvements, such as the installation of gates, would also be made to several Public Rights of Way (PRoW) that meet the road, and short new sections of cycleway would be formed. The majority of existing laybys would be retained and unaffected by the widening.
- 5.3.9 Low-noise road surfacing, comprising a thin surface course material incorporating 10mm aggregate, would be applied to reduce the effects of noise associated with future traffic flows along sections of the highway (these being associated with the construction and future operation of the Power Station).
- 5.3.10 Widening would also require the replacement of some bus shelters, telephone boxes, road markings and signage at different locations along the highway. Please see application plans for further details.
- 5.3.11 Sections of carriageway made redundant by the Proposed Development, such as those resulting from the improvements at Bytheicws (Section 4), would be stopped up and the half widths returned to adjacent landowners or retained to provide access to properties.
- 5.3.12 Facilities for the provision of an air quality monitoring station would be provided in the vicinity of the properties at Bryn Tirion, within Section 4 of the Proposed

Development. The detailed specification of the proposed facilities and equipment will be discussed and agreed with the IACC.

5.4 Indicative construction timeline

- 5.4.1 It is expected that the Proposed Development would take place over a period of 66 weeks, excluding the four week period that would be required to demobilise the Temporary Construction Compound and restore the land to its former condition.
- 5.4.2 Construction operations within Sections 2, 4, 6 and 8 would be undertaken concurrently in order to reduce the total length of disruption on the highway network, i.e. works would be undertaken on all four sections at once. Upon completion of works within Sections 2, 4, 6 and 8, the application of surfacing dressing to Sections 1, 3, 5 and 7 would then commence.
- 5.4.3 The following durations per section are anticipated:
- construction within Section 2 = 52 weeks;
 - construction within Section 4 = 50 weeks;
 - construction within Section 6 = 62 weeks;
 - construction within Section 8 = 42 weeks; and
 - surface dressing within Sections 1, 3, 5 and 7 = four weeks in total.
- 5.4.4 Coordination of services will be undertaken with all utility providers to programme diversion and accommodation works for all utilities and coordinate with the improvement works for each section of the online works. Ongoing discussions with each utility provider is being undertaken to ascertain the works required and to understand the programming requirements for each provider. Early engagement ahead of construction will allow the contractor to programme in the works required to the services.

5.5 Consultation

- 5.5.1 Horizon has carried out a number of public and stakeholder consultations on the Wylfa Newydd Project, incorporating the emerging proposals for the A5025 Highway Improvements. This has included targeted consultation specific to the A5025 On-line Highway Improvements. A summary of each of the consultation stages is provided as follows:

Stage One Pre-Application Consultation - September 2014

- 5.5.2 Horizon community consultations commenced in autumn 2014 with the Stage One Pre-Application Consultation, where residents and other consultees attended exhibitions, presentations, drop-in sessions and open surgeries; and viewed regular updates on Horizon's social media accounts and consultation website. Over 400 responses were made to the Stage One Pre-Application Consultation.

Associated Development Consultation - July 2015

- 5.5.3 In response to feedback received from the Stage One Pre-Application Consultation, and in order to progress the design, Horizon refined the

Associated Development proposals through the first half of 2015 and presented them in July 2015, with in the form of targeted consultation, particularly for local authorities and the local communities of the Isle of Anglesey.

Wylfa Newydd Project Update - January 2016

- 5.5.4 In order to ensure stakeholders were informed of the latest progress on the Project, including the emerging A5025 On-line Highway Improvements, a series of public consultation events was held in early 2016. This was supported by information provided in a document prepared for the consultation, the Wylfa Newydd Project Update, January 2016, which included a series of consultation questions to assist in guiding the responses.

Environmental Impact Assessment Progress Report -2016

- 5.5.5 The EIA Progress Report [RD21] was provided to the IACC and Natural Resources Wales (NRW). It included updated information on the design development and environmental assessment of the Proposed Development. The consultation feedback provided valuable information to feed into the design process prior to the next round of wider consultation.

Local Planning Consultation- May 2016

- 5.5.6 A series of six information events were held by Horizon across a period of one week in May 2016. The purpose of the events was to consult on Horizon's SPC Proposals to prepare the Wnda for construction, and to seek feedback on proposals for the A5025 On-line Highway Improvements.
- 5.5.7 In terms of presentation materials, large-scale maps of each Section of the A5025 were provided for review, including detailed drawings of the proposals. These showed the sections of the A5025 that Horizon proposed to reconstruct and those that would be surface dressed. Information was also presented on existing PMA, and how the design would affect them. This included private driveways with direct access onto the A5025.
- 5.5.8 Information was also provided on: the timing of the planning application submission and construction; the types of work that would be undertaken during construction; and how local contractors would be used (including details of contractor community liaison).

Stage Two Pre-Application Consultation – September 2016

- 5.5.9 In September 2016, Horizon undertook its Stage Two Pre-Application Consultation on the updated proposals for the Project. The consultation documents included a description of how the proposals had evolved since the previous consultation outlined above, and how feedback from stakeholders had been taken into account.
- 5.5.10 A Main Consultation Document was produced with a series of specific consultation questions designed to assist with the consultation. A Preliminary Environmental Information Report for the Project was produced in order to assist consultees in formulating their responses; this also presented

preliminary details of the predicted environmental effects and mitigation measures of the Proposed Development.

Stage Three Pre-Application Consultation – May 2017

5.5.11 In May 2017, Horizon launched the third stage of pre-application consultation. This provided an update on the Wylfa Newydd Project since the Stage Two Pre-Application Consultation in autumn 2016, and requested feedback on the proposed changes to the various elements of the Project. A series of exhibitions, pop up events and stakeholder meetings were held from 24 May to 22 June 2017, to present the updated proposals.

Statutory Section 61Z Pre-application Consultation – August 2017

5.5.12 The Proposed Development constitutes 'major development' under the *Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (as amended)* (the Order) [RD22] and is therefore subject to a requirement to carry out Pre-Application Consultation in accordance with section 61Z of the TCPA [RD1] and Part 1A of the Order [RD22].

5.5.13 Responses received during the section 61Z consultation have been taken into account by Horizon in finalising both the design and environmental assessment of the Proposed Development.

5.5.14 Details of this consultation, a summary of the responses received and how Horizon has addressed those responses is summarised in the Pre-Application Consultation Report, submitted in support of this planning application.

Summary of consultation responses

5.5.15 Overall, broad support was received following the above consultations for the need for road improvements, noting that the identified A5025 On-line Highway Improvements were a step towards this. Feedback received from the above consultation events centred upon the following themes and subjects:

- general support for improving the existing A5025 in the manner proposed by Horizon;
- further information requested regarding improvements to road safety measures, speed restrictions, construction traffic management and transportation of materials;
- concern over the volume and direction of traffic (to and from site) and the potential for drivers to use back roads surrounding the A5025 during the construction period;
- request for additional road improvements between Cemaes and Burwen, and between Cemaes and Amlwch;
- safety in relation to continued access to private properties, visibility during construction and PRow users;
- consideration given to the needs of cyclists, walkers and equestrians in relation to safe crossing points;
- clarity on the proposed diversions of PRow and cycle paths;

- further information requested on proposed landscaping and the replacement of boundary walls, fences and hedgerows;
 - requests for measures to reduce potential air quality and noise pollution;
 - further consideration to be given to protection of amenity for local residents and the assessment of community effects;
 - requests for signage to be provided for local services;
 - an overall preference for a shorter but more intensive duration of construction works;
 - concerns regarding the effect of construction on commercial interests;
 - concern over the potential for mud and debris to be brought onto the highway during construction;
 - concerns over the proximity of construction traffic and maintaining access to residential properties;
 - the need to ensure the workforce is “locally based” and confirm how this will be achieved;
 - concerns over the potential effect that construction may have on the Welsh language and culture;
 - commitment to promoting suitable skills and qualifications for young people to secure employment with the Wylfa Newydd Project;
 - request to adequately address the potential impacts on tourism;
 - potential for disruption to wildlife;
 - request for the submission of further mitigation strategies and environmental management plans;
 - clear interpretation of environmental baseline survey information;
 - ensuring high level of biodiversity mitigation and benefits from reinstatement works;
 - concerns over increasing flood risk;
 - further information required on attenuation pond design and the proposed increase in carriageway levels in terms of potential flood risk;
 - concerns over reinstatement of the highway following construction;
 - concerns over potential night-time closures and the effect on emergency services; and
 - concerns over the timing of construction of the Proposed Development and other works forming part of the Project.
- 5.5.16 The above comments were factored into the design evolution process. Details of how these specific themes and subjects have been addressed by Horizon are presented in appendix 3.1 and 3.2 in Volume 3 of the Environmental Report, and in section 6.4 of the Pre-Application Consultation Report.

Stakeholder engagement

5.5.17 The design of the Proposed Development has been developed in consultation with a number of stakeholders including, but not limited to, the following:

- IACC;
- Cyfoeth Naturiol Cymru / Natural Resources Wales (NRW);
- Welsh Government;
- Community Councils;
- Gwynedd County Council and Flintshire County Council;
- Landowners (and/or their Agents);
- North Wales Wildlife Trust (NWWT);
- North Wales Police;
- North Wales Fire and Rescue Service;
- Sustrans;
- CL:AIRE (Contaminated Land: Applications in Real Environments); and
- Utility providers (National Grid, Dwr Cymru Welsh Water and BT Openreach).

5.5.18 This engagement has focused on a range of topics; the purpose has been to seek feedback and agreement on the following areas.

- Formal scoping – to establish with the IACC the form and nature of individual assessments to be undertaken and reported as part of the planning application for the A5025 Highway Improvements (as the Proposed Development and the A5025 Off-line Highway Improvements were not separated at that time), and any other environmental information required to enable its determination.
- Formal screening – to determine whether the IACC considered that the Proposed Development could result in significant environmental effects, and thereby constitute development requiring formal Environmental Impact Assessment as prescribed under the *Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2016* [RD23] (these being the prevailing regulations in force at the time of Horizon making the screening request to the IACC).
- Consenting – to discuss specific matters with the IACC concerning Horizon's planned consenting strategy for the Proposed Development, and the content of the documentation comprising the planning application.
- Engineering design and environmental assessment – to update stakeholders on the development of the engineering design and environmental assessment of the Proposed Development.

5.5.19 Targeted meetings, telephone calls, presentations and workshops have also been held with representatives of these organisations to agree the following matters:

- the scope and extent of traffic modelling, modelling assumptions and identification of potential issues relating to vehicle delays and queuing during construction;
 - the approach to construction in terms of the methodology, phasing and durations of works, and the requirement for traffic management;
 - the physical relationship(s) to the A5025 Off-line Highway Improvements and the timing of their construction;
 - the methodologies to be followed within the individual assessments;
 - the mitigation measures to be embedded into the design and applied during construction to avoid and/or reduce its environmental effects, such as pedestrian and cycle provisions and landscaping;
 - the way in which the information would be presented and reported across the planning application documentation; and
 - the outcomes from the consultation events noted above and their influence on the environmental assessment.
- 5.5.20 Details of how the design and environmental assessment have been influenced by stakeholder engagement are presented in appendix 3.1 and 3.2 in Volume 3 of the Environmental Report, and in section 6.4 of the Pre-Application Consultation Report. A summary is provided in section 4 of the Design and Access Statement, submitted with this planning application.

5.6 Summary of Design Development

- 5.6.1 The Proposed Development has been subject to a process of design evolution, informed by both consultation with stakeholders and the iterative environmental assessment.
- 5.6.2 These processes have helped inform the identification and selection of strategic and local highway solutions, the approaches to construction and delivery of the improvements, and the refinement of designs to reduce, where practicable, their potential environmental effects.

Road design development

- 5.6.3 Independent studies were commissioned by Horizon and the IACC between 2010 and 2011 and identified that a package of road improvements would be needed to ensure routes used by future development traffic associated with the Project are of a suitable standard. The design development process below refers to both the A5025 Highway Improvements.
- 5.6.4 The first stage of design work and optioneering (the process of identifying, assessing and evaluating options) for the A5025 Highway Improvements commenced in 2011. A series of conceptual design options were developed and subjected to assessment and evaluation.
- 5.6.5 Following development of the conceptual designs, Horizon progressed the development of route options in 2014. Studies into the current condition of the existing carriageway were undertaken in 2015, which identified a need for strengthening of the existing pavement in order to sustain future traffic.

- 5.6.6 This stage of design development concluded that a combination of surface dressing, pavement reconstruction and widening works would be necessary throughout all eight Sections of the A5025. The designs were then developed further, focusing on modifications to the existing carriageway to widen bends, improve stopping sight distances from junctions, improve route signage, reconstruct the existing pavement and apply surface dressing.
- 5.6.7 Detailed engineering designs were developed for the scheme from mid-2015, following the second stage of optioneering, further site surveys and consultation.
- 5.6.8 It was concluded during the latter stages of design development that the scheme should include provision for a dedicated temporary pavement recycling facility within the overall design. Optioneering was undertaken to identify potential sites for the plant and a preferred location was identified near Cefn Coch (Section 7).
- 5.6.9 The Proposed Development has been subject to a process of design evolution, informed by both consultation with stakeholders and iterative environmental assessment, as explained in the Design and Access Statement and summarised in chapter 2 and appendix 3.2 of the Environmental Report.

Temporary structures design development

- 5.6.10 The Temporary Construction Compound will be managed by the appointed contractor and will be used to store materials, plant, equipment and standard portable cabins to serve as site offices. The proposed layout for the Temporary Construction Compound is therefore indicative at this stage (see Figure 3-4 in the Design and Access Statement submitted with this application).
- 5.6.11 The layout of the Temporary Construction Compound has been developed to meet a series of requirements, driven by the site constraints and the functional operational constraints. The key site constraints have been identified to:
- respond to the context of the site;
 - maximise the retention of key site characteristics;
 - break down the scale and potential impact of the areas of parking/stockpiling of materials; and
 - reduce the potential impact of the structures on site.
- 5.6.12 The final layout of the Temporary Construction Compound will be determined by the appointed contractor, with details provided in the Construction and Environmental Management Plan (CEMP) to be prepared by the contractor in line with the principles set out in the CoCP.
- 5.6.13 Although the potential for design alternatives is limited for the Proposed Development as a whole, further information of design alternatives considered is provided at chapter 2 in volume 1 of the Environmental Report and summarised in section 5 of the Design and Access Statement.
- 5.6.14 The final designs and construction methodology for the Proposed Development are presented in section 2.7 in volume 1 of the Environmental Report.

6 Relevant legislation

6.1 Town and Country Planning Act 1990

- 6.1.1 The TCPA [RD1] is the primary legislation in respect of the control of development in Wales. It governs all development other than NSIPs which, as discussed above, are consented under the Planning Act 2008.
- 6.1.2 Planning permission is required in order to undertake 'development' which is defined in the TCPA [RD1] as:
- “the carrying out of building, engineering, mining or other operations in, on, over or under land, or the making of any material change in the use of any buildings or other land”, (section 55(1), page 35).
- 6.1.3 Applications for planning permission are submitted to the local planning authority, in this instance, IACC, for determination.
- 6.1.4 The basis for determining planning applications is set out at Section 38(6) of the *Planning and Compulsory Purchase Act 2004* [RD24], which states:
- “If regard is to be had to the development plan for the purposes of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise”.*

6.2 Active Travel (Wales) Act 2013

- 6.2.1 The Active Travel (Wales) Act 2013 ('Active Travel Act') [RD25] makes it a legal requirement for local authorities in Wales to map and plan for suitable routes for active travel, and to build and improve their infrastructure for walking and cycling every year. It creates new duties for highways authorities to consider the needs of walkers and cyclists and make better provision for them. It also requires both the Welsh Government and local authorities to promote walking and cycling as a mode of transport.
- 6.2.2 The Active Travel Act [RD25] imposes obligations on local authorities and the Welsh Government when using their powers under the Highways Act 1980, “to take reasonable steps to enhance the provision made for walkers and cyclists” and to “promote active travel journeys and secure new and improved active travel routes and related facilities”, (section 1(e), page 1).
- 6.2.3 For the purposes of the Project the relevant highways authority is IACC. Horizon has entered into a collaboration agreement with IACC for the delivery of the A5025 Highways Improvements between Valley and the proposed Power Station Access Road Junction. Should the Proposed Development be delivered by IACC then the provisions of the Active Travel Act [RD25] will apply to the Project. The Active Travel Act [RD25] places a requirement on the IACC to continuously improve facilities and routes for walkers and cyclists and requires new road schemes to consider the needs of pedestrians and cyclists at design stage. As show in chapter 5 in volume 1 of the Environmental Report this has been fully considered. Section 2 (1) of the Active Travel Act states “a route in a local authority's area is an active travel route if—(a) the route is situated in a designated locality in the area, and (b) the local authority

considers that it is appropriate for it to be regarded as an active travel route”, (page 2).

- 6.2.4 The Welsh Government has identified a number of designated localities on Anglesey, these are Amlwch, Bodedern, Holyhead, Llanfairpwll, Llangefni, Menai Bridge and Valley.
- 6.2.5 Section 2(7) defines an ‘active travel journey’ as a “*journey made to or from a workplace or educational establishment or in order to access health, leisure or other services or facilities*”, (page 3).
- 6.2.6 The Power Station will provide significant employment opportunities for its construction phase and these workers are likely to be resident on Anglesey. The village of Cemaes and the town of Amlwch are within a feasible cycling commuter zone and therefore the route along the A5025 between Amlwch and the Power Station could, once the Power Station is operational, be considered to be an active travel route between two communities and a key workplace.

6.3 Highways Act 1980 (as amended)

- 6.3.1 The *Highways Act 1980 (as amended)* [RD26] is an Act of the UK Parliament concerning the management and operation of the highway network in both England and Wales. This legislation provides local authorities with a range of powers relating to the highway network within their administrative area, including powers to:
- Improve highways, including by the division of carriageways, provision of roundabouts and variation of the relative widths of carriageways and footways;
 - repair and maintain public footpaths and bridleways;
 - enter into agreement as to dedication and widening; and
 - plant trees etc. and to maintain roadside verges.
- 6.3.2 Horizon is finalising an agreement under Section 278 of the Highways Act 1980 that will cover the implementation agreement of the works. This enables IACC to secure assurance that does not expose the Local Highway Authority to unreasonable risks as a consequence of the works.

6.4 Environment (Wales) Act 2016

- 6.4.1 *Environment (Wales) Act 2016* [RD27] sets out the detailed provisions to translate the long term policy commitments into legislation which will enable more sustainable management of Wales’ natural resources. Section 6 of the Environment (Wales) Act 2016 [RD27] places a specific duty on public authorities to “seek to maintain and enhance biodiversity in the exercise of their functions in relation to Wales” which includes the determination of planning applications. The objective of this legislation is to ensure that in managing natural resources the long term resilience of ecosystems and the benefits they provide are fully considered. As such, considering the potential impact of decisions, which might have an impact on the benefits provided by Wales’ natural resources and ecosystems, to ensure they are maintained. The sustainable management of natural resources through the application of the

principles is intended to help meet current needs without adversely affecting the ability of future generations to meet their needs.

6.5 Well-being and Future Generations (Wales) Act 2015

- 6.5.1 This Act seeks to improve the economic, social, environmental and cultural well-being of Wales. Under this Act, public bodies have a duty to carry out sustainable development, including the identification of well-being objectives and taking reasonable steps to meet these. Public bodies must work towards achieving seven well-being goals identified under the Act and demonstrate progress towards these.

7 Planning Policy and Guidance

- 7.1.1 This chapter outlines the overarching planning policy and guidance documents that are relevant to assessing the Proposed Development.

7.2 National Planning Policy Context

- 7.2.1 Studies undertaken by Horizon in 2010–2011 identified that the stretch of the A5025 between Valley and the proposed Power Station Access Road Junction has physical and operational constraints in relation to its width, alignment, overtaking opportunities and surfacing condition (see chapter 2 in volume 1 of the Environmental Report).
- 7.2.2 As a result of these studies Horizon has committed to improve this section of the A5025 in order to mitigate the predicted impacts of increased traffic associated with construction activities that would be undertaken at the Wylfa Newydd Development Area, and from operational Power Station traffic, that would travel along this part of the highway network.
- 7.2.3 The primary planning policy documents for NSIP projects are NPSs. Of relevance to the Project are NPS EN-1 [RD3] and NPS EN-6 [RD4], both designated by the UK Government in 2011. The application for a DCO for the Wylfa Newydd DCO Project, will be determined in accordance with the NPS except in limited circumstances including where the adverse impacts of doing so would outweigh the benefits.
- 7.2.4 Advice from UK Government⁵ has confirmed that NPSs can be a material consideration for Local Authorities in exercising any role they have in relation to NSIPs, including where considering applications for planning permission for preliminary or preparatory works on site ahead of the main DCO for nuclear projects. EN-1 [RD3] and EN-6 [RD4] are therefore material considerations in the determination of this application. A summary of relevant provisions of EN-1 [RD3] and EN-6 [RD4] is provided below.

EN-1

- 7.2.5 This NPS summarises the wider UK policy context regarding energy and climate change and outlines the need for new low carbon energy production in the UK. Part 3 of EN-1 confirms that this need is ‘urgent’ and that “*without significant amounts of new large scale energy infrastructure, the objectives of the UK’s energy and climate change policy cannot be fulfilled*”, (para. 3.2.3, page 17).
- 7.2.6 NPS-EN-1 [RD3] highlights that the urgent need for new energy generation is such that deployment of significant new capacity is required within 10-15 years, as 22GW of existing electricity generating capacity will be lost in coming years (representing one quarter of capacity). Further to this, energy consumption is expected to increase and potentially double by 2050. As such, 59GW of new electricity generation is identified as being required by 2025.

⁵ Local Authorities’ Role in New Infrastructure Consenting Process for Nationally Significant Infrastructure Projects: letter from Chief Planner (DCLG) and Chief Executive, 16 July 2009 [RD11].

The NPS indicates that new nuclear power, as a low carbon source of energy, should be free to contribute as much as possible towards meeting this identified need by 2025.

- 7.2.7 In this context of urgent need for energy development, NPS EN-1 [RD3] advises the decision maker to *"start with a presumption in favour of granting consent to applications for energy NSIPs"* (para. 4.1.2, page 44) where this would provide low carbon energy in required timescales, and for substantial weight to be given to considerations of need in determining applications. Obtaining planning permission for the Proposed Development, rather than including it in the DCO application, serves to reduce the overall Wylfa Newydd Project programme. This in turn allows the earlier generation of power by the Power Station, addressing the urgent need for low carbon energy detailed in NPS EN-1 [RD3].

EN-6

- 7.2.8 EN-6 provides policy guidance specifically for nuclear power generation proposals. The urgency for increased supply of energy by this technology, in the context of general need outlining NPS EN-1 [RD3], is strongly emphasised.
- 7.2.9 The NPS identifies 'Wylfa' as a potentially suitable location for a new nuclear power station to be deployed by 2025 to meet the identified and urgent need for low carbon energy. The objective of the Project is to construct the new nuclear power station at this location (and accordingly, to undertake the Proposed Development to facilitate the construction of the Power Station).
- 7.2.10 The urgent need for low carbon energy such as nuclear power is clearly set out in NPS EN-6 [RD4]. Granting planning permission for the Proposed Development, will support the delivery of the Wylfa Newydd DCO Project. It is therefore considered that obtaining planning permission for the Proposed Development is supported by national policy.

Planning Policy Wales

- 7.2.11 The 9th edition of PPW [RD6] was published in November 2016. This document provides the land use planning policies of the Welsh Government, translating the commitment to sustainable development into the planning system so the Government can play an appropriate role in moving towards sustainability.
- 7.2.12 The policies cover all matters which can be material in the consideration and determination of planning applications and are supported by the various TANs and other Welsh Government Circulars and policy clarification letters. Due to its recent revision PPW [RD6] (Edition 9) can be considered to contain an up to date representation of Welsh Government Policy and, as such, significant weight must be applied to its provisions.

Technical Advice Notes (TAN)

- 7.2.13 A number of TANs, listed below, are material considerations with respect to the preparation, consideration and determination of this planning application. These advice notes are prepared to be read alongside PPW, providing more detailed, topic specific, guidance on how national policy will be realised.

- TAN 5: Nature Conservation and Planning (2009) [RD28];
- TAN 6: Planning for Sustainable Rural Communities (2010) [RD29];
- TAN 11: Noise (1997) [RD30];
- TAN 12: Design (2006) [RD31];
- TAN 13: Tourism (1997) [RD32];
- TAN 15: Development and Flood Risk (2004) [RD33];
- TAN 16: Sports, Recreation and Open Space (2009) [RD34];
- TAN 18: Transport (2007) [RD35];
- TAN 20: Planning and the Welsh Language (2017) [RD36];
- TAN 21: Waste (2014) [RD37]
- TAN 23: Economic Development (2014) [RD38]; and
- TAN 24: The Historic Environment (2017) [RD39].

Wales Spatial Plan- People, Places, Futures (Welsh Assembly Government, 2004 and People, Places, Futures – The Wales Spatial Plan update 2008 (welsh Assembly Government, 2008)

- 7.2.14 Originally adopted in 2004 then updated in 2008 the *Wales Spatial Plan – People, Places, Futures (Welsh Assembly Government, 2008)* [RD7], sets out high-level policy which recognises the protection and enhancement of cultural heritage to be essential, and the conservation of the heritage of each area within Wales to be important. Although outdated at times, it should be recognised that due weight should be given to the document as it still remains a part of the national framework.

7.3 National and Regional Transport Strategies

Wales Transport Strategy – One Wales: Connecting the Nation [RD40]

- 7.3.1 This Strategy outlines how the transport policy approach is more responsive in its delivery of the Government's wider policy agenda and attempts to be flexible in reflecting different regional circumstances. The four main regions in Wales were represented by a regional transport consortium, created through partnerships between neighbouring local authorities. Taith was the regional transport partnership that represented the six local authorities in north Wales. This partnership has now ceased operations. The Wales Transport Strategy promotes sustainable transport networks that safeguard the environment while strengthening economic and social life. Key identified priorities include:
- reducing greenhouse gas emissions and other impacts;
 - integrating local transport;
 - improving access between key settlements and sites;
 - enhancing international connectivity; and
 - increasing safety and security.

Emerging National Transport Plan, 2015 (consultation document 2014) [RD14]

- 7.3.2 This Plan will help deliver the Welsh Government's objectives for transport, as set out in the Wales Transport Strategy. It reflects the Government's ongoing programme of investment in transport improvements. It also sets out how future schemes will be identified and developed. The Emerging National Transport Plan identifies national and regional transport improvements to be taken forward, whilst LPAs are expected to identify priorities at the local level within the Local Transport Plans (which is still currently under development for north Wales). The Welsh Government is expected to engage with LPAs throughout this planning process to ensure an integrated approach between national, regional and local priorities. Five key priorities are set:
- support economic growth and safeguard jobs with a particular focus on the City Regions, Enterprise Zones and local growth zones;
 - reduce economic inactivity by delivering safe and affordable access to employment;
 - maximise the contribution that effective transport services can make to tackling poverty and target investment to support accessibility improvements for the most disadvantaged;
 - encourage safer, healthier, safer and sustainable travel; and
 - connect communities and enable access to key services.

North Wales Joint Local Transport Plan 2015 (JLTP) [RD15]

- 7.3.3 Under Section 108 of the *Transport Act 2000* [RD41] as amended by *Transport (Wales) Act 2006* [RD42] the six North Wales Local Authorities were required to produce a Local Transport Plan. The JLTP [RD15] has been jointly prepared by the North Wales Local Authorities and covers a detailed programme from 2015-2020 and a framework for schemes until 2030. It sets out a range of interventions and schemes for all modes of travel, some applying across all authorities and some locally based.
- 7.3.4 The JLTP was submitted in its final form to the Welsh Government on 31 Jan 2015. It is a statutory document that sits alongside the JLDP [RD8] and other policies and plans for Anglesey.

North Wales Regional Transport Plan (2009) [RD43]

- 7.3.5 The adopted Regional Transport Plan (RTP) for the North Wales region was produced in 2009. The vision of the North Wales Regional Transport Consortium is to "*deliver safety, sustainable and efficient transport networks to support the economic and social activities of North Wales' diverse communities and businesses having regards to its strategic European role*", (para. 4.2, page 59).
- 7.3.6 The North Wales RTP [RD43] seeks to efficiently meet North Wales' diverse transport needs, reduce congestion and journey times and maintain safe and efficient transport networks.

7.4 Local Transport Strategies

Isle of Anglesey County Council Cycling Strategy (Isle of Anglesey County Council, 2014) [RD44]

- 7.4.1 This Strategy has been produced to coordinate the IACC's approach to cycling, and to ensure that the IACC is aware of and able to fulfil the requirements of the *Active Travel (Wales) Act, 2013* [RD25] along with other legislation that has a bearing on cycling. Existing cycling provision has been reviewed and potential future provision considered. The Strategy was prepared to form the basis of a delivery plan which highlights the way the IACC wants to see the cycle network on Anglesey develop, as well as allowing for available resources to be targeted effectively.
- 7.4.2 In terms of the Power Station, the strategy indicates that proposals would necessitate improvements to the A5025 corridor (in line with the *Active Travel Wales Act 2013*). In addition, the Proposed Development should ensure that consideration is made of walking and cycling routes to help reduce single occupancy vehicle trips to and from the Power Station Site.
- 7.4.3 The document also states that shared footway/cycleway paths should be provided with a minimum width of 2.5m where possible. This is in preference to the provision of segregated footway/cycleways.

The Isle of Anglesey Single Integrated Plan 2013 – 2025 (Isle of Anglesey County Council, 2012) [RD45]

- 7.4.4 The Welsh Government placed a requirement upon every Local Service Board to produce a Single Integrated Plan by April 2013. The Local Service Board on Anglesey consists of the police, health, voluntary sector, fire and rescue service, further and higher education sectors and local town and community councils. For Anglesey, the following four plans were merged and superseded by the Single Integrated Plan: Health, Social Care and Well-being Strategy; Community Strategy; Children and Young People's Plan; and Community Safety Plan.
- 7.4.5 The purpose of the Single Integrated Plan is to improve the quality of life of local people and communities by enhancing Anglesey's economic, social and environmental well-being over the next 12 years. The Single Integrated Plan identifies three key themes: people, places and jobs. It also includes provisions to tackle the complex and long-term big issues on Anglesey, including improving its economic performance, enabling communities to maintain and develop their independence, ensuring adequate opportunities for young people, reducing poverty and promoting the island's rich environment and culture.

7.5 Local Planning Context

Anglesey and Gwynedd Joint Local Development Plan 2011 – 2026 (2017)

- 7.5.1 The JLDP [RD8] forms the current development plan for Anglesey. The JLDP [RD8] covers the local authorities of the IACC and Gwynedd Council.

- 7.5.2 Following its adoption on 31 July 2017, the JLDP replaced the previous development plans for both authorities and now forms the basis for Land Use planning in these areas. The JLDP is intended to cover the period 2011 to 2026. The following plans and interim policies have now been superseded by the JLDP:
- *Gwynedd Structure Plan (1993)* [RD10];
 - *Anglesey Local Plan (1996)* [RD9];
 - *Anglesey Unitary Development Plan (stopped) (2005)* [RD46];
 - *Interim Planning Policy: Large Sites (2011)* [RD47]; and
 - *Interim Planning Policy: Rural Clusters (2011)* [RD48].
- 7.5.3 The JLDP [RD8] also supersedes the *Gwynedd Unitary Development Plan (2009)* [RD49] which related to the Gwynedd Local Planning Authority Area.
- 7.5.4 Given the adoption of the JLDP [RD8], it can now be given full weight in the determination of planning applications.
- 7.5.5 The overall vision of the JLDP [RD8] is: *“By 2026, Anglesey and Gwynedd will be recognised for their vibrant and lively communities that celebrate their unique culture, heritage and environment and for being places where people choose to live, work and visit”*, (para. 4.7, page 21).
- 7.5.6 The JLDP [RD8] considers the Project at paragraph 4.4 stating:
- 7.5.7 *“The New Nuclear Station at Wylfa is a positive driver for the transformation of the economy and communities on Anglesey, providing sustainable employment opportunities, improving the quality of life for the existing and future generations and enhancing local identity and distinctiveness”*, (page 21).
- 7.5.8 It recognises that the Project will require significant private sector investment, especially in infrastructure, bringing major economic, social and environmental opportunities. The JLDP [RD8] also includes policies relating to Wylfa Newydd, including Policy PS9 which outlines the factors which will be taken into account when considering various components of the Project.

New Nuclear Build at Wylfa SPG [RD17]

- 7.5.9 The Wylfa SPG [RD17] was published by IACC in 2014. The overarching purpose of this SPG [RD17] is to provide guidance on important local, direct and indirect matters. It sets out the IACC’s vision and objectives for the new nuclear development at Wylfa and is the most up-to-date guidance available for the Wylfa Newydd Project. It also aspires to:
- inform the IACC’s position in its Local Impact Report and subsequently the Statement of Common Ground (documents to be submitted to the Planning Inspectorate as part of Development Consent Order examination);
 - provide a planning framework to guide applicants and influence the Wylfa Newydd Project’s design and development to ensure sustainable outcomes, with a focus on Associated Development;

- inform pre-application discussions for the Wylfa Newydd Development Area and Associated Development;
- offer supplementary local-level guidance consistent with the National Policy Statements; and
- form a material consideration in the assessment of the Wylfa Newydd Project elements that are subject to Town and Country Planning Act applications.

7.5.10 IACC's Vision for Wylfa Newydd is confirmed as:

"The New Nuclear Build at Wylfa is a positive driver for the transformation of the economy and communities on Anglesey, providing sustainable employment opportunities, improving the quality of life for existing and future generations and enhancing local identity and distinctiveness", (para. 3.1.3, page 25).

7.5.11 The Wylfa SPG [RD17] outlines particular considerations and constraints relating to the impacts of the Project in relation to Anglesey's largest settlements and key transport corridors and also includes general guidance on a number of topics, including:

- economic development;
- tourism;
- population and community;
- construction worker accommodation;
- Welsh language and culture;
- transport;
- utilities;
- waste;
- climate change; and
- natural and historic environment.

7.5.12 The IACC have also made a commitment to revise and update the Wylfa SPG [RD17] in its review of the JLDP. Specifically, the Councils' have indicated a target to publish the updated Wylfa SPG [RD17] within 6 months of the JLDP's adoption, suggesting the new guidance will be adopted in early 2018.

7.5.13 As the Wylfa SPG [RD17] was produced prior to the adopted of the JLDP, the weight that can be afforded to it will decrease as the updated version of the Wylfa SPG emerges

8 Planning Considerations and Analysis

- 8.1.1 This chapter demonstrates consideration of potential impacts resulting from the Proposed Development and assesses the Proposed Development against relevant planning policies.
- 8.1.2 In undertaking this assessment, the effects of the Proposed Development are identified in accompanying planning application documents which have been used and considered against material planning policy requirements.

8.2 Key Planning Considerations

- 8.2.1 National and local level planning policies relevant to the Proposed Development have been thoroughly considered. .
- 8.2.2 The key planning considerations that relate to the Proposed Development can be considered under the following headings:

The principle of development

- 8.2.3 Studies undertaken by Horizon in 2010–2011 identified that the stretch of the A5025 between Valley and the proposed Power Station Access Road Junction has physical and operational constraints in relation to its width, alignment, overtaking opportunities and surfacing condition (see chapter 2 in volume 1 of the Environmental Report).
- 8.2.4 As a result of these studies Horizon has committed to improve this section of the A5025 in order to mitigate the predicted impacts of increased traffic associated with construction activities that would be undertaken at the Wylfa Newydd Development Area, and from operational Power Station traffic, that would travel along this part of the highway network.
- 8.2.5 NPS EN-1 [RD3] and NPS EN-6 [RD4] confirm the Government's commitment to the construction of new nuclear power stations as part of transition to a secure, safe, low-carbon, and affordable energy system in the UK, which is required in the national interest. NPS EN-1 [RD3] states that it is important that new nuclear power stations are constructed and start generating as soon as possible, given the urgent need for low carbon forms of electricity to contribute to the energy system.
- 8.2.6 The Proposed Development responds specifically to the objectives of NPS EN-1 [RD3], which identifies the need for early deployment of new nuclear power stations to help provide security of electricity supplies in the period post-2015, when a significant amount of existing generating capacity is due to close and the country faces potential shortages of base load generation. The Proposed Development forms an important component of the Project, and is required as part of the wider transport strategy. Should a development consent order be granted for the Project, it would be necessary for construction traffic to use the A5025 from the A55 Junction 3 to the north of Valley to travel to the Power Station Access Road Junction.

- 8.2.7 The Government's guidance to local authority chief planning officers clearly states that local authorities are able to grant planning permission for preliminary works applications in advance of a DCO application⁶.
- 8.2.8 Whilst the Proposed Development responds to national policy on nuclear power generation, it is also important and necessary to consider the Proposed Development against relevant adopted development plan policies and other material Local Planning Policy and Guidance.
- 8.2.9 Highway improvements to the A5025 are supported by planning policy. The Wylfa SPG [RD17] states in Paragraph 4.6.7 states that key junctions and sections of carriageway may need improving to cope with peak traffic flows (these include sections of the A5025 and Junction 3 (A55/A5 junction)).
- 8.2.10 The JLDP [RD8] states that improvements to the existing transport network will be granted provided they conform to a number of criteria. These include minimising the impact on the built and natural environment, minimising permanent land take, improvement in road safety and improvement in terms of overall accessibility (Policy TRA1). Paragraph 6.1.46 of the JLDP [RD8] confirms that the four main locations on the route between Valley and the Power Station Site that will require significant improvements are as listed below. These four locations are within the scope of the Proposed Development.
- A5/A5205 (Valley);
 - A5025 (Llanfachraeth);
 - A5025 (Llanfaethlu); and
 - A5025 (Cefn Coch)'.
- 8.2.11 The JLTP [RD15] aims to improve connections to key destinations and markets, enhance access to employment and services, increase levels of walking and cycling, improve safety and security and at the same time bring benefits and minimise impacts on the environment. Table 6.4 of the JLTP [RD15] confirms that A5025 Valley to Amlwch improvement works in preparation for the construction of Wylfa Newydd are a regional priority project.
- 8.2.12 In light of the above policy support for improvements to the A5025, it is considered that the principle of the Proposed Development is acceptable.
- 8.2.13 In accordance with policy TRA1 of the JLDP in particular, the Proposed Development has been sensitively designed to respect the scale and character of the surrounding area, to improve road safety, to keep permanent land take to a minimum and to prevent as far as possible any adverse impacts on surrounding residential amenity, ecological receptors or the setting of heritage assets (as explained further in the accompanying Environmental Report). It is therefore justified that the Proposed Development is required, the principle is acceptable and should be granted permission.

⁶ Local Authorities' Role in New Infrastructure Consenting Process for Nationally Significant Infrastructure Projects: letter from Chief Planner (DCLG) and Chief Executive, 16 July 2009.

Welsh Language

- 8.2.14 PPW [RD6] states that Welsh language should be supported by the planning system and that considerations related to the use of Welsh language may be taken into account by decision makers so far as they are material to applications for planning permission (para 4.13.5).
- 8.2.15 Furthermore, TAN 20 [RD36] confirms that where the use of Welsh language is a significant part of the social fabric of a community, the interest and needs of the Welsh language should be taken into account.
- 8.2.16 The JLDP [RD8] contains strong support for promoting the Welsh language, with Strategic Policy PS1 requiring a WLIA to be submitted as part of the application to show how the proposed development will protect, promote and enhance the Welsh language. The policy states that proposals that would cause significant harm to the character and language balance of a community that cannot be avoided or suitably mitigated by appropriate planning mechanisms, will be refused. Furthermore, Policy PS 1 states that the Councils will require a bilingual signage scheme to deal with all operational signage in the public domain.
- 8.2.17 Policy GP13 of the Wylfa SPG [RD17] similarly confirms that Welsh language and culture should be maintained and where possible strengthened and that all planning applications for associated development will be expected to demonstrate how a Welsh language strategy will be delivered by the proposed development.
- 8.2.18 Horizon understands that the Welsh language and culture are important matters to local communities and is committed to developing the Project (including the Proposed Development) in a way which respects the Welsh language and culture. Horizon will mitigate impacts to the Welsh language and culture through the following mitigation measures:
- The appointed contractor would be required to implement and adhere to the IACC's *Welsh Language Policy, 2016* [RD50] which includes the provision of bilingual traffic signs.
 - In order to raise awareness amongst those non-Welsh speaking workers about Welsh language and culture, workers from outside the DCCZ would be provided with welcome packs to include information on the Welsh language on Anglesey.
 - Should new job posts emerge as a result of the Proposed Development, those posts would be advertised through the Wylfa Newydd Employment & Skills Service (a local brokerage service) being established by the IACC, the North Wales Economic Ambition Board (NWEAB), Grŵp Llandrillo Menai, the Department for Work & Pensions and Horizon to maximise local employment opportunities.
 - A IACC Framework Contract and a 'Meet the Buyer' event to support the local suppliers have already been implemented. In order to further enhance the opportunities for local businesses as suppliers to the appointed contractor, details of Horizon's list of local suppliers would be shared with the appointed contractor.

- 8.2.19 In line with Strategic Policy PS1 in the JLDP [RD8] the planning application for the Proposed Development has considered the effects of the development on the needs and interests of the Welsh language. As such, the application is accompanied by a WLIA. PS 1 states that proposals that would cause significant harm to the character and language balance of a community that cannot be avoided or suitably mitigated by appropriate planning mechanisms, will be refused. In terms of effects on the Welsh language and culture, those affected by the Proposed Development are likely to include communities and businesses along the route and, in terms of employment, in the wider Daily Construction Commuting Zone (DCCZ) (this zone represents the one-way-travel zone (approximately 90 minutes) assumed for workers to commute on a daily basis from their permanent residence to the WNDA).
- 8.2.20 Construction related effects would be temporary and subject to good practice mitigation to minimise disruption and inconvenience to existing communities and businesses. Minor adverse impacts are identified for some local businesses and services along the route due to disruption and changes to access arrangements. Increased spend within local businesses during the 66 week construction period is however expected to take place and is considered to be beneficial in terms of supporting the viability of the Welsh language in the communities along the route of the Proposed Development.
- 8.2.21 In line with Policy PS 1 of the JLDP and policy GP13 of the Wylfa SPG [RD17], Welsh language is expected to be strengthened due to the Proposed Development. Local suppliers are expected to benefit from the new opportunities which arise during construction of the Proposed Development to provide services and supplies to the appointed contractor.
- 8.2.22 Positive impacts from the Proposed Development are also identified from direct employment, with the majority of workers expected to be locally-based, within the DCCZ, and further beneficial effects from indirect job creation which, in turn, allows Welsh speakers to stay in their communities.
- 8.2.23 Based on the duration and nature of the Proposed Development, it is expected that 75% of the construction workforce of up to 125 persons would be locally based, and the remaining 25% would be non-local. Beneficial effects are likely to be realised through local employment opportunities for construction workers. Around 75% of workers (94) are anticipated to be DCCZ residents and 48.1% of DCCZ residents working within the construction industry on Anglesey are reported to be Welsh speakers. If the construction workforce were to reflect these figures, then approximately 45 of the construction workers would be Welsh speakers.
- 8.2.24 Policy PS 1 states that the Councils will require a bilingual signage scheme to deal with all operational signage in the public domain. All temporary road signage used as part of the traffic management at each of the construction/working areas will be bilingual. All permanent new signage in association with the completed works will be bilingual.
- 8.2.25 Overall, in accordance with adopted planning policy, the WLIA has demonstrated that the Proposed Development is expected to have positive impacts on Welsh language and culture. Therefore, only limited mitigation and enhancement measures are proposed and these relate to maximising future employment and supply chain opportunities that would result from the

Proposed Development for local people and local suppliers, and raising awareness amongst workers about Welsh language and culture.

Design

- 8.2.26 Good design is recognised as an important feature by the relevant planning policies. The JLDP [RD8] at Policies PS5 and PCYFF3 also promote high quality design and set out criteria for achieving this. GP20 of the Wylfa SPG [RD17] requires all development related to the Wylfa Newydd Project to adopt high quality design principles.
- 8.2.27 PPW [RD6] and TAN 12 [RD31] contain similar provisions, confirming that good design is central to achieving sustainable development.
- 8.2.28 The accompanying Design and Access Statement sets out the approach to design for Proposed Development. It also describes how the design of the Proposed Development, including access, has been considered from the outset of the development process and how the objectives of good design have been used to inform this.
- 8.2.29 As noted, this application is for a series of improvements to an existing road rather than to result in an operational period which would be used and experienced in the long term. As such, not all design policies are relevant to the Proposed Development. However, the principles of good design in terms of the siting of development and its appearance have been included within the works as far as practicable.
- 8.2.30 Horizon has followed good design aims as far as possible in developing the proposals. The assessment undertaken in the Design and Access Statement demonstrates that the proposals can be considered acceptable. The Design and Access Statement also details how the consideration of alternative design options has influence the Proposed Development, as required by Strategic Policy PS8 in the JLDP [RD8].

Landscape

- 8.2.31 PPW [RD6] confirms that conservation of landscapes is a key objective of the Welsh Government and that landscape considerations are an integral part of the design process that should be taken into account at an early stage (para 4.11.8). TAN 12 [RD31] seeks design to sustain or enhance local character, promote good landscape design and be mindful of appearance and layout.
- 8.2.32 In line with the above policies and also paragraph 4.11 of TAN 12 [RD31], an assessment of the landscape effects has been completed and can be viewed in chapter 12 in volume 1 of the Environmental Report.
- 8.2.33 Policy AMG3 in the JLDP [RD8] requires that proposals do not have significant adverse impact upon features and qualities which are unique to the local landscape in terms of visual, historic, geological, ecological or cultural aspects. This policy clarifies that particular emphasis will be given to developments which directly affect the landscape character and setting of AONBs.
- 8.2.34 The Proposed Development has sought ensure that the proposals would not have a significant adverse impact upon features which are unique to the local landscape.

- 8.2.35 The construction activities associated with the Proposed Development at Section 2, comprising the removal of a boundary wall and its replacement along the realigned highway boundary, would border the AONB, involving the loss of a narrow corridor of AONB land at Llanynghenedl for approximately 200m. Surface dressing works would border the AONB at Section 3 in Llanfachraeth. Proposed mitigation includes management of landscaping to ensure all such measures establish successfully and are maintained.
- 8.2.36 As part of the widening works for the Proposed Development, site clearance would be required, including removal of boundary features such as cloddiau (stone faced earth banks), stone walls, hedgerows and fences, and the loss of grass verges and small areas of other vegetation. A primary aim of the design approach and landscape strategy is to retain boundary features wherever possible, or mitigate their loss by replacing them on a like-for-like basis.
- 8.2.37 On completion of construction, changes to the character of the AONB would be barely perceptible; therefore having no landscape effect.
- 8.2.38 The Proposed Development would be located outside of any Special Landscape Areas, the nearest being the Mynydd Mechell SLA which lies approximately 1km east of Cefn Coch.
- 8.2.39 The loss of 0.5m of Important Hedgerow in Section 4 would be permanent; however, due to the extremely small extent of the loss compared to the length of the remaining hedge, this effect is considered to be slight adverse. The proposed planting in the adjacent hedge lines would compensate for this loss by improving the species diversity in the long term.
- 8.2.40 There would be no landscape change on the Mynydd Mechell SLA due to the limited nature of the Proposed Development (resurfacing and widening of an existing highway) and the SLA's distance from the Proposed Development.
- 8.2.41 In accordance with the requirements of policy PCYFF 2 in the JLDP [RD8] and the principles of paragraph 5.14.5 of TAN 12: Design [RD31], it is proposed to minimise temporary lighting during construction activities, in order to reduce the effects of lighting in night-time views. Lighting would be provided at the Temporary Construction Compound along the proposed perimeter hoarding fence and the portable site offices. The lighting design will be developed to provide sufficient light for safe working but also to minimise unnecessary light pollution.
- 8.2.42 The integration of the proposals into the surrounding landscape has been fully considered in the design of the Proposed Development, in accordance with AMG 3 in the JLDP [RD8]. For example, there has been careful consideration of the design of the attenuation ponds proposed within Section 2 to improve the integration of these features into the receiving landscape pattern i.e. although the pond is intended to perform a drainage function it will be enhanced through planting. Planting would be in keeping with local landscape character, and modified or widened grass verges would be reseeded. A further example is that the hoarding to be used around the perimeter of the Temporary Construction Compound is to be finished in green to assist visual integration with the local environment.
- 8.2.43 Although scope for change of the positioning of the road improvements is limited (due to the existing alignment of the road), Horizon has had due

consideration to the proposed widening and boundary treatment proposals. For example, identifying the most appropriate solutions for different locations along the road, such as the reinstatement of boundary wall features on a like-for-like basis and the translocation of hedgerows to align the new highway boundary, augmented by infill planting, and developing alignment options that avoid effects on hedgerows and stone walls where possible.

- 8.2.44 Strategic Policy PS19 of the JLDP [RD8] states that hedgerows or woodland of visual, ecological, historic cultural or amenity value should be protected, retained or enhanced. There will be management of proposed landscaping to ensure all such measures establish successfully and are maintained. Details of the measures are contained in the A5025 On-line Highway Improvements Design Approach and Landscape Strategy.
- 8.2.45 During construction of the Proposed Development there are expected to be negative impacts due to the changes to the landscape character and views. However this is temporary and once the construction has completed there is not expected to be significant changes to the existing views. No impacts are predicted to remain following completion of the construction as landscaping measures would have established and achieved their intended function of integrating and screening the Proposed Development.
- 8.2.46 In summary, the potential landscape impacts of the Proposed Development have been considered in the context of relevant planning policies. The Proposed Development seeks to sustain and enhance local character, promote good landscape design and is mindful of appearance and layout in terms of the proposed mitigation and enhancement measures. As such it is considered that the Proposed Development is in accordance with the Development Plan with respect to landscape matters.

Nature Conservation and Ecology

- 8.2.47 PPW [RD6] confirms that the planning system should promote biodiversity objectives and seek to minimise the fragmentation of habitats (paragraph 5.2.8). Paragraph 1.5.1 and 4.3.2 of TAN 5 [RD28] states that biodiversity conservation is an integral part of planning for sustainable development and proposals should include measures to enhance nature conservation interests where possible.
- 8.2.48 JLDP Policy PS 5 states that development will be supported where it is demonstrated that they are consistent with sustainable development principles. These include, inter alia, the protection and improvement of the quality of the natural environment, its landscapes and biodiversity assets.
- 8.2.49 Strategic Policy PS19 in the JLDP [RD8] confirms the Councils will have regard to the relative significance of the designations in considering weight to be attached to acknowledged interests. This policy also confirms that proposals that have a significant adverse effect on the Plan area's distinctive natural environment, countryside and coastline will be refused, unless the need for and benefits of the development in that location clearly outweigh the value of the site or area and national policy protections for that site or area.
- 8.2.50 Policy AMG 5 in the JLDP [RD8] states that proposals affecting sites of local biodiversity importance will be refused unless there are no other satisfactory alternative sites available for the development, the need for the development

outweighs the importance of the site for local nature conservation and appropriate mitigation or compensation measures are included as part of the proposal.

- 8.2.51 Policy AMG 6 in the JLDP [RD8] states that proposals that are likely to cause direct or indirect significant harm to Local Nature Reserves (LNR), Wildlife Sites (WS) or Regionally Important Geological / Geomorphologic Sites (RIGS) will be refused, unless it can be proven that there is an overriding social, environmental and/or economic need for the development, and that there is no other suitable site that would avoid having a detrimental impact on sites of local nature conservation value or and local geological importance.
- 8.2.52 As explained in chapter 11 in volume 1 of the Environmental Report these matters have been fully considered in the design of the Proposed Development.
- 8.2.53 Due to the nature of the Proposed Development and the limited construction works within or adjacent to watercourses, and based on the embedded mitigation measures of applying a protective 10m buffer area around watercourses to avoid any potential hydrological connectivity with the Proposed Development, the Proposed Development would not affect freshwater receptors such as aquatic invertebrates and fish.
- 8.2.54 No statutory or non-statutory nature conservation designations are situated within or immediately adjacent to the planning application boundary and therefore no adverse effects on these are expected.
- 8.2.55 Construction has however the potential to affect ecological features through the loss of habitat as a result of site clearance, earthworks and excavation activities, the formation and presence of the Temporary Construction Compound and the establishment of landscaping.
- 8.2.56 In line with the aims of Strategic Policy PS19 of the JLDP [RD8] which encourage planning applications to consider the effect on nature conservation and ecology, the following measures have been embedded within the design of the Proposed Development to minimise the effects on ecological features.
- Translocation of suitable existing hedgerow material to the realigned boundary, including infill planting (refer to paragraph 11.4.11 in the Environmental Report for a description of the methodology).
 - Reuse of the walling stone pertinent to each location.
 - When walling stone is reused, the material will be replaced on the same orientation to maintain the micro environment for any lichens, mosses or liverworts present.
- 8.2.57 Measures to avoid offences under the relevant legislation, as outlined within the A5025 On-line Highway Improvements Protected and Legally Controlled Species Report, would also mitigate for any effects associated with boundary removal. For example, areas of habitat importance for Great Crested Newts (GCN) would be clearly demarcated to ensure no accidental incursion by construction works.
- 8.2.58 Great crested newt Habitat Suitability Index (HSI) assessment of ponds was undertaken within a buffer area of approximately 500m of the A5025, between May 2013 and March 2014. Presence/absence surveys were undertaken in

May through to June 2013, and in April 2014 on a selection of suitable ponds. Pre-construction population estimates were completed between April and June 2017 on suitable ponds within 250m of the Proposed Development, the findings are presented in Annex B of the A5025 On-line Highway Improvements Protected and Legally Controlled Species Compliance Report.

- 8.2.59 Durable temporary amphibian exclusion fencing would be installed between the construction area and the adjacent retained habitat to prevent GCN straying into the construction area.
- 8.2.60 The hedgerows, walls and cloddiau that have been removed as part of the site clearance phase would be replaced on a like-for-like basis along the realigned highway boundary. It is not therefore considered that the temporary removal and subsequent replacement of the relatively short sections of hedge or wall within the wider terrestrial area used by GCNs would affect their ability to survive in the locality.
- 8.2.61 The provision of attenuation ponds in Section 2 could be of benefit to ecological features including the GCN. Planting around the perimeter of the attenuation ponds would provide further habitat of benefit to species listed as species of principal importance in Wales in the *Environment (Wales) Act, 2016* [RD51] and would be considered to be a positive effect (see A5025 On-line Highway Improvements Design Approach and Landscape Strategy for further details).
- 8.2.62 The potential for effects on otter are limited to where culverts require extension or alteration. Measures to avoid offences under the relevant legislation that has been outlined within the A5025 On-line Highway Improvements Protected and Legally Controlled Species Report would also mitigate for any effects associated with culvert extension. For example, if otter sites are encountered within the footprint of the Proposed Development during construction, works in the area would be temporarily halted and a European Protected Species licence would be secured from NRW if required. This, combined with the small-scale nature of the work, means that there would not be a negative impact on otter. No effects are predicted with regard to the Temporary Construction Compound, as a buffer zone (approximately 10m) to the watercourse has been embedded into the design, allowing otters clear passage along the watercourse.
- 8.2.63 The potential risk to bats, birds, badgers and reptiles would be associated with the temporary habitat loss of boundary features (hedgerows and walls), including limited tree removal. A total of approximately 3.0km of hedgerow and 2.9km of stone walls would be removed and replaced during site clearance. In Section 4, approximately 0.5m of Important Hedgerow, as per the ecological criteria of the Hedgerows Regulations 1997 (amended 2002), would be lost permanently as it is located perpendicular to the Proposed Development and cannot be replaced.
- 8.2.64 Site clearance would also include the loss of garden vegetation at Bryn Tirion and approximately 20 trees at Bytheicws, Aber Pwll Farm and Nanner Road, only two of which have a canopy diameter greater than 2.5m. This indicates that only two of the trees are mature. Please refer to the Arboricultural Report completed in September 2017, which is provided in Appendix 12.2 of the Environmental Report for further information.

- 8.2.65 Considering the small scale of the loss (as set out in detail in chapter 2 in volume 1 of the Environmental Report), the abundant availability of these habitat types in the adjacent area and the embedded mitigation measures (e.g. no site clearance during the bird breeding season, translocation of hedgerow, replacement of wall material and new hedgerow planting) that would be implemented to ameliorate these impacts, no negative impacts on these species are expected.
- 8.2.66 Based on the above matters, it is considered that the Proposed Development complies with Strategic Policies PS5 and PS19 and policies AMG5 and AMG6 in the JLDP [RD8] as there will be no adverse impacts on wildlife species with statutory protection.
- 8.2.67 No operational effects are predicted on terrestrial ecology, as there would be no change in the operation of the A5025 (post-construction) when compared to the existing situation.
- 8.2.68 The limited nature of the works associated with the Proposed Development is such that no additional mitigation measures are required and compliance with relevant planning policies is achieved. In line with the objectives of PPW [RD6] (paragraph 5.2.8) the Proposed Development has sought to minimise negative impacts on habitats. The A5025 On-line Highway Improvements Protected and Legally Controlled Species Report presents a proposed approach for protected species (if required), which includes mitigation measures such as avoidance of construction activities during the bird breeding season.
- 8.2.69 Furthermore, as explained in Appendix 11.11 of the Environmental Report, the Proposed Development would result in biodiversity enhancements. This comprises the creation of species rich hedgerows which provide a greater biodiversity value than currently present and the creation of two attenuation ponds which are likely to support a variety of invertebrates (which results in enhanced foraging opportunities for birds, bats, amphibians and reptiles. There is also potential for the ponds to be used by water vole).

Historic Environment

- 8.2.70 PPW [RD6] confirms that the historic environment including listed buildings, archaeological remains and ancient monuments, historic parks, gardens and landscapes are protected and should be enhanced where possible (paragraph 6.1.1).
- 8.2.71 Policy AT1 in the JLDP [RD8] concerns Conservation Areas, Registered Historic Landscapes and Parks and Gardens and their setting and outlines the key considerations for proposals which would affect these Heritage Assets or their setting. Policy AT4 in the JLDP [RD8] sets out protection of non-designated sites and their settings and confirms the proposals which affect locally important archaeological remains will only be granted if the need for the development overrides the significance of the remains.
- 8.2.72 Strategic Policies PS5 and PS20 in the JLDP [RD8] confirms that proposals which preserve and enhance Heritage Assets, their setting and significant views into and out of them will be supported. This policy, supported by Policy AT1, AT2 and AT4, confirms that proposals which preserve and where appropriate enhance the following Heritage Assets, their setting and significant views into and out of the building/area will be supported:

- Scheduled Ancient Monuments and other areas of archaeological importance;
- Listed Buildings and their curtilages;
- Conservation Areas;
- Registered Historic Landscapes, Parks and Gardens (in line with Policy AT1); and
- Buildings of architectural/ historic/ cultural merit which are not designated or protected (in line with Policy AT3).

8.2.73 In line with these policies, Horizon has fully considered the impacts of the Proposed Development and sought to minimise any adverse effects. Chapter 13 in volume 1 of the Environmental Report provides an assessment of these effects (as is required through policy GP22 of the Wylfa SPG [RD17]).

Archaeological remains

8.2.74 Topsoil clearance and road widening activities during construction of the Proposed Development would remove or partly remove any surviving remains of:

- Ty'n-y-waen (Site of a building) (Asset 15);
- building (Site of), north-west of Pandy Cefn-coch (Asset 268); and
- east / west former field boundary, Bytheicws (Asset 370).

8.2.75 Topsoil clearance during the establishment of the Temporary Construction Compound would remove any surviving remains of:

- Former road (Asset 356).

8.2.76 During the establishment of the Temporary Construction Compound, the movement and operation of machinery and plant would be visible in views, diminishing the rural character of the setting of:

- two small orthostatic stones on slight mound, south of Ty'n y Felin (Asset 241); and
- Melin Bodronyn (Site of a former mill) (Asset 251).

8.2.77 It is not however expected that the Proposed Development will cause significantly negative impacts on these features.

8.2.78 Capel Soar Standing Stone (Asset 146), a Scheduled Ancient Monument, is located approximately 5m to the east of the A5025 in Llanfaethlu. While construction of the Proposed Development would introduce noise and visual intrusion into views west from asset 146, these activities would be temporary and short-term and would not affect the ability to understand the asset. No negative impact is therefore predicted on this asset and it is considered that the Proposed Development is therefore in compliance with Strategic Policies PS5 and PS20 in the JLDP [RD8] which require that Scheduled Ancient Monuments and their settings are protected.

Historic Buildings

8.2.79 Policy PCYFF3 of the JLDP [RD8] seeks to ensure that the historic environmental context should be taken into account in the design of proposals.

In accordance with this policy, Horizon have fully taken into account the location and significance of historical buildings in their consideration of the design of the Proposed Development. Construction of the Proposed Development would result in temporary intrusion on the setting of 47 historic buildings. For example, two buildings east of Melin Ty'n y Felin and two buildings south of Pen-y-groes Arthur (see chapter 13 in volume 1 of the Environmental Report for further details). These short-term effects would result from noise and visual intrusion associated with construction works such as site clearance, construction of earthworks and drainage, excavation of the existing road pavement, laying of the new pavement and the application of surface dressing.

- 8.2.80 Pavement reconstruction and widening, and surface dressing activities would impact the setting of 40 historic buildings. Of these, the following would be negatively impacted:
- Bethel-hen, Llanrhyddlad (Asset 227; Grade II Listed Building); and
 - Windmill, Ty'n y Felin (Asset 279; Grade II Listed Building).
- 8.2.81 For the remaining 38 historic buildings, either the setting does not contribute to their value, or the assets are set back from the road making construction activities less intrusive to their setting. It is not therefore expected that there will be negative impacts on the 38 historic buildings.
- 8.2.82 The construction of and operational activities within the Temporary Construction Compound would result in short-term noise and visual intrusion into the setting of seven assets, comprising:
- Ty'n Felin (Asset 242, Medieval / Post-medieval building);
 - Melin Ty'n y Felin, Medieval / Post-medieval building, at the possible Former Site of, Cylch y Garn (Asset 243);
 - two Post-medieval buildings east of Melin Ty'n y Felin (Asset 244);
 - two Post-medieval buildings, south of Pen-y-groes Arthur (Asset 249);
 - Pen-y-groes Arthur (Glan-yr-afon) (Asset 250, Post-medieval building);
 - Capel Seilo, Pen y Groes (Asset 252, Post-medieval chapel); and
 - Carreg Cam (Asset 253, Medieval / Post-medieval building).
- 8.2.83 No historic buildings of high value which include Grade I and II* Listed Buildings have been identified within the study area (as defined in chapter 13 in volume 1 of the Environmental Report).
- 8.2.84 The presence and operation of the Proposed Development would maintain the existing character and improve the condition and appearance of the existing A5025 as a single carriageway road. As such, this would not affect key attributes of the setting of archaeological remains or historic buildings.
- 8.2.85 No effects on archaeological remains or historic buildings are therefore predicted during operation of the Proposed Development. As such, in line with Strategic Policies PS20 and policy AT4 in the JLDP [RD8], Horizon has sought to ensure that the Proposed Development safeguards and enhances the integrity of historical sites.

Historic Landscape Types

- 8.2.86 Pavement reconstruction and widening within Sections 2, 4, 6 and 8 would result in the removal of boundary features (see chapter 2 in volume 1 of the Environmental Report for further details).
- 8.2.87 The construction effects resulting from the removal of boundary features from Historic Landscape Types (HLTs), namely HLT 2, HLT 3, HLT 9, HLT 11 and HLT 12, including 19 hedgerows that are likely to be important under the *Hedgerows Regulations, 1997* [RD52], would continue during operation. However, they are not predicted to result in an overall loss of the historic legibility of these HLTs, or affect the ability to understand them. It is not therefore considered that there will be a negative impact.
- 8.2.88 As confirmed at paragraphs 6.5.3 and 6.5.4 in PPW [RD6], if physical preservation of archaeological remains is not justified, the development must demonstrate appropriate investigation and recording of the remains. As such, the following additional mitigation measures, including preservation recording, have been identified to further reduce the effects of the Proposed Development on cultural heritage assets and HLTs:
- A targeted archaeological watching brief would be undertaken during groundworks that have the potential to disturb buried archaeology associated with Assets 15 (site of Ty'n-y-waen), 268 (building north-west of Pandy Cefn-coch), 356 (former road) and 370 (east/west former field boundary at Bytheicws), in accordance with guidance provided in Standard and Guidance for an Archaeological Watching Brief (ClfA, 2014);
 - A Level 2 Landscape Survey would be undertaken in accordance with guidance provided in *Understanding the Archaeology of Landscapes, a guide to good recording practice* [RD53] and a photographic survey would be undertaken based on the guidance provided by Gwynedd Archaeological Planning Service (GAPS, 2015). This would provide a record of historic landscape elements forming HLT 2 (The small industrial valley complex along the banks of the Afon Cafnan HLT), HLT 3 (area in southern Llanfechell), HLT 9, HLT 11 (area of mid-19th century field systems and farms) and HLT 12, which includes 19 hedgerows (identified as important under the Hedgerows Regulations 1997) that would be removed as part of construction activities. To assist with mitigating this loss, it is proposed to replant hedgerows as close to the original line of the existing hedgerow as possible, as many of the hedgerows are important due to the boundary line they demarcate.
- 8.2.89 In line with Policy AT3 of the JLDP [RD8], which confirms that development should be sympathetic to the historic environment, the Proposed Development has sought to limit the extent of any adverse effects on heritage. Following mitigation measures (carrying out the archaeological watching brief and conducting a Level 2 Landscape Survey) the effects will be limited to short term negative impacts on the settings of historic buildings and archaeological remains due to the pavement construction, widening and Temporary Construction Compound works.

8.2.90 In line Strategic Policies PS20 and policy AT4 in the JLDP [RD8], Horizon has thoroughly considered the impacts of the Proposed Development on archaeological sites and historical features. Given the mitigation proposed (as noted above), the Proposed Development protects and seeks to enhance such features where possible and is therefore in accordance with adopted planning policies related to archaeology and heritage.

Traffic and Transport

8.2.91 PPW [RD6] promotes a sustainable and efficient transport system and confirms, inter alia, that the impacts of development on travel demand, transport infrastructure, traffic management measures, safety and user convenience should be considered (paragraph 8.6). Horizon has considered these factors in relation to the Proposed Development in detail as set out in chapter 6 in volume 1 of the Environmental Report.

8.2.92 As explained in Section 3 of this document, the A5025 does require improvements to address road safety, road conditions, and poor alignment matters. As set out in chapter 6 in volume 1 of the Environmental Report, the design of the Proposed Development, that will ensure these improvements are made, has been sensitively considered in the context of the environment and landscape within which the improvements are located.

8.2.93 Although the Wylfa Newydd DCO Project will be determined through a DCO rather than a TCPA application, Horizon has committed to improve this section of the A5025 in order to mitigate the predicted impacts of increased traffic associated with construction activities that would be undertaken at the Wylfa Newydd Development Area, and from operational Power Station traffic, that would travel along this part of the highway network.

8.2.94 Policy TRA1 of the JLDP [RD8] states that improvements to the existing transport network will be granted provided they conform to a number of criteria. These include minimising the impact on the built and natural environment, minimising permanent land take, good high quality design, improvement in road safety and improvement in terms of overall accessibility. Paragraph 6.1.46 in the JLDP [RD8] provides explicit reference to necessary improvements that should be made to the A5025 (as set out in paragraph 8.2.8 of this document). The conclusions of the Environmental Report demonstrate that the necessary highway improvements can be delivered in such a way to ensure that the impacts are acceptable.

8.2.95 Paragraph 4.6.7 of the Wylfa SPG [RD17] states that the key junctions and sections of carriageway that may need improving to cope with peak traffic flows are sections of the A5025, Junction 3 (A55/A5 junction) and Junction 1 (A55 at Holyhead). The Proposed Development is in line with GP14 of the Wylfa SPG [RD17] which states that the project promoter (Horizon) should ensure that highway improvements are provided where appropriate.

8.2.96 In line with the IACC Cycling Strategy (2014) [RD44], the assessment of recreation takes into account the effects of the Proposed Development on the amenity of identified cycle routes. The Proposed Development incorporates improvements to cycling provision by providing linkages across the A5025 between existing cycle routes, identified as contributing to the fulfilment of IACC's cycling objectives. In addition, the assessment of active travel has

considered the extent to which the Proposed Development would promote and enable active travel journeys.

- 8.2.97 The Proposed Development will enable the improvement of the A5025 sufficient to accommodate the construction and operational traffic generated by the Project. In line with policy TRA1 of the JLDP [RD8], the Proposed Development will provide necessary improvements to the A5025 to facilitate the movement of traffic however these have been designed to ensure that impacts on the environment are acceptable (as explained in this chapter of the Planning Statement).
- 8.2.98 Chapter 6 (traffic and transport) in volume 1 of the accompanying Environmental Report predicts that within Section 2, 2018 baseline flows of 5,700 would increase by approximately 4% to 5900 as a result of construction traffic, while within Section 8, 2018 baseline flows of 2,900 would increase by approximately 7% as a result of construction traffic. All other percentage increases within the remaining Sections are predicted to be between 4-7%.
- 8.2.99 The increase in traffic flows during construction would increase the likelihood for queuing, leading to potential delays at locations under traffic management. Accordingly, drivers, passengers and public transport users would experience a low magnitude of change in journey times, leading to a short term slight adverse effect.
- 8.2.100 Overall, the Proposed Development is in accordance with adopted planning policy relating to transport. The Proposed Development will assist IACC in delivering their policy aspirations in terms of improving the existing transport network whilst ensuring the environmental impacts are minimised and acceptable.

Public Access and Recreation

- 8.2.101 PPW [RD6] highlights that the rights of way network should be protected and enhanced as a recreational and environmental resource (para 11.1.13). TAN 18 [RD35] encourages the use of PRow for sustainable travel and states that development should identify and protect existing and proposed recreational routes (Section 6). TAN 16 [RD34] requires PRow to be protected and considered adequately when assessing applications for planning permission. In line with the above policies and guidance, the Environmental Report has fully considered the impact of the Proposed Development on public access and recreation.
- 8.2.102 Strategic Policy PS4 in the JLDP [RD8] confirms that, where possible, PRow and cycle networks should be safeguarded, improved, enhanced and promoted.
- 8.2.103 A total of 51 footpaths are located within the study area (as defined in the Environmental Report); these are associated with Sections 2 to 8 of the Proposed Development. No PRow have been identified within Section 1 of the Proposed Development.
- 8.2.104 Of the 51, 42 PRow have been ascribed a medium value and 9 a low value (as listed in table 5.2 of the Environmental Report). Two National Cycle Network (NCN) routes (Route 5 and Route 566) cross the A5025, these comprise a series of traffic free paths and on road cycling and walking routes.

- 8.2.105 The Proposed Development would involve the temporary closure of 35 PRoWs during construction, using Temporary Traffic Regulation Orders. In addition, the temporary closure and diversion of PRoW 18/018/1 would be required during construction to facilitate the siting and operation of the Temporary Construction Compound. The highway junction that PRoW 49/011/1 adjoins would be also stopped up as part of the Proposed Development.
- 8.2.106 Traffic along the existing A5025 currently impedes the movement of active travel for Non-Motorised Users within the local communities of Valley and Llanfachraeth, and to people from further afield accessing facilities in these, and other communities, situated along the A5025.
- 8.2.107 During construction, PRoW that interface with the A5025 between Valley and the Power Station Access Road Junction would be temporarily closed on safety grounds. Permanent improvements and the provision of PMAs are however proposed.
- 8.2.108 The highway junction that PRoW 49/011/1 adjoins would be stopped up as part of the Proposed Development. Pedestrian access would however be maintained through a new wicket gate. Replacement of existing boundary features with a wooden wicket gate would improve access provision to PRoW 27/008/1.
- 8.2.109 Within Section 2, a 250m-long segregated cycleway would be provided at Llanyngghenedl where the NCN Route 5 crosses the A5025 between Bodedern (B5109 junction) and the Newland Park area of Valley. This cycle path would be 2m to 3m wide and segregated from the A5025 by a grassed verge. Figure 5-3 in volume 2 of the Environmental Report shows the location and detail of these improvements. This new cycle path, which would be a minor change to the existing road design, would result in cyclists being able to cross the A5025 as a single traffic movement rather than having to cross by way of a staggered junction movement. This would increase safety at this junction and would have a positive impact for recreational cyclists.
- 8.2.110 Furthermore, in Section 8, a new segregated cycle crossing on NCN Route 5 and on the A5025 between Nanner Road and the junction to Llanfechell is proposed. The cycle path would be 2m wide and segregated from the A5025 by a grassed verge. Figure 5-4 within volume 2 of the Environmental Report shows the details of this new section of cycle route.
- 8.2.111 PRoW will be kept open wherever practicable throughout the construction of the Proposed Development. However, where closures are unavoidable, the closures will be obtained using appropriate means, such as a Temporary Traffic Regulation Order by the Contractor, and will be of the shortest duration practicable for the works required.
- 8.2.112 No additional mitigation measures over these described in the A5025 On-line Highway Improvements CoCP in respect of the management of footpath closures have been identified as being required to address the limited potential negative effects during construction and operation of the Proposed Development.
- 8.2.113 As, shown above, the Proposed Development has been prepared taking into account the potential effects on pedestrian and vehicular traffic matters, PRoW, cycling and accessibility of vehicular access. As explained in the

Environmental Report, in line with Strategic Policy PS4 of the JLDP [RD8], where possible, PRoW and cycle networks have been safeguarded and improved in order to promote sustainable public access and recreation.

8.2.114 Overall, Horizon has limited the effects on PRoW and NCNs as far as possible and proposes a CoCP to manage footpath closures and limit adverse impacts as far as possible. The limited negative impacts on users of the A5025 and NCNs as a result of the Proposed Development is acceptable when considering the benefits of the development as a whole.

Flood Risk

8.2.115 PPW [RD6] confirms at paragraph 13.2.1 and 13.2.4 that flood risk is a material consideration in planning and that it should seek to reduce, and not increase, flood risk from river and coastal flooding or from additional run-off.

8.2.116 A review of TAN 15 [RD33] indicated that a Flood Consequences Assessment (FCA) would be required, as part of the Proposed Development would be located within Flood Zone C2 (areas of floodplain without significant flood defence infrastructure). TAN 15 [RD33] also discusses the need for a catchment approach, as a development can increase flood risk elsewhere. Accordingly, an FCA has been undertaken for the Proposed Development on this basis.

8.2.117 A scoping process concluded that the FCA should solely focus on construction and operation of the Proposed Development within Sections 2, 4, 6 and 8 and the Temporary Construction Compound within Section 7, due to the potential effects to occur on surface water and groundwater receptors.

8.2.118 Section 2 of the Proposed Development is situated in Flood Zone C1, an area served by significant infrastructure, including flood defences. Section 4 is situated in Flood Zone C2, at the crossing of the Tan R'Allt. Sections 6, 8 and the Temporary Construction Compound (within Section 7) are entirely located in Flood Zone A (i.e. considered at little or no risk of flooding).

8.2.119 Sections 2, 4, 6 and 8 of the Proposed Development all have some risk of fluvial flooding at river crossings. In Section 2, there are additional fluvial flood risks associated with the crossing of the Afon Alaw floodplain. However, since the highway would be at the same level or raised to some degree, the risk of flooding would not be worse than the current risk.

8.2.120 Surface water flood risk, in the majority of cases, is confined to the river floodplains at crossing points. The exception to this is within Section 8 where there is an area of ponding to the south of the road. The drainage strategy (appended to the FCA), incorporated into the design of the Proposed Development, would manage the risk of flooding from surface water.

8.2.121 The drainage strategy for the Proposed Development would ensure that additional runoff from impermeable surfaces does not impact downstream flood risk. The design would provide a level of protection up to the 100-year return period event (1% AEP). In Section 2, two attenuation ponds have been included within the design of the Proposed Development to further reduce the flood risk at Valley.

- 8.2.122 Locations have been identified within Section 8 where the Proposed Development would require existing culverts to be lengthened to extend across the full width of the widened road. The culverts would be designed to ensure that the hydraulics of the proposed culverts do not increase flooding to properties adjacent to the streams.
- 8.2.123 Section 2 falls within the flood risk zone of the reservoir Llyn Alaw. Since reservoir failure is considered very unlikely due to the high specifications of the structure and the regular inspections and maintenance, the risk has been assessed as being low.
- 8.2.124 Groundwater flooding is considered to be low for Sections 2, 4, 6 and 8 due to the impermeable nature of the superficial deposits along the A5025, leading to little interaction between groundwater and surface water.
- 8.2.125 Policy PS5, PCYFF6 of the JLDP [RD8] and Policy GP19 of the Wylfa SPG [RD17] confirm that development should incorporate Sustainable Drainage Systems (SuDs) where practicable and proposals should use flood minimisation or mitigation measures where possible to reduce surface water run-off and minimise its contribution to flood risk elsewhere.
- 8.2.126 Implementation of the Proposed Development would not significantly alter the existing vertical alignment of the operational carriageway; therefore, the risk of flooding would not be worse than the current risk. In line with policy PCYFF6 of the JLDP [RD8] and GP19 of the Wylfa SPG [RD17], this is because the highway drainage measures embedded into the Proposed Development design (see chapter 2 of the Environmental Report) would manage flood risk – for example in Section 2, attenuation ponds have been incorporated into the design to provide a level of protection.
- 8.2.127 The drainage strategy for the Proposed Development, contained in Appendix A of the Flood Consequence Assessment submitted in support of this planning application, would ensure that additional run-off from impermeable surfaces does not impact downstream flood risk. The design would provide different attenuation volumes depending on the specific site constraints at each section. However, the target return periods are between the 1 in 1 and 1 in 5 year events. In Section 2, two attenuation ponds, restricting run-off to a 1 in 2-year discharge rate and providing attenuation for a 100-year event plus an allowance for climate change, have been included within the design of the Proposed Development to further reduce the flood risk at Valley.
- 8.2.128 Some existing drainage infrastructure would be used, and where necessary, new infrastructure would comprise a combination of culverts, gullies, dished channels, filter strips, carrier/filter drains and kerb drainage to capture and carry road runoff to watercourse discharge points. Gullies and carrier/filter drains would connect to existing ditches or watercourses and discharge to existing outfall locations. As noted above, two attenuation ponds would be created in Section 2 to attenuate and control the discharge of highway runoff into nearby watercourses.
- 8.2.129 The drainage system and maintenance regime for the Proposed Development would be comparable to the existing system.

- 8.2.130 The Proposed Development does comprise essential transport infrastructure and is therefore considered appropriate, despite part of the application site being located within Flood Zone C2.
- 8.2.131 Based on the conclusions of the FCA, the magnitude of change has accordingly been assessed as being negligible (please see the FCA and chapter 9 in volume 1 of the Environmental Report for further details). On this basis, the Proposed Development is in accordance with policies within PPW [RD6] and guidance set out within TAN 15 [RD33] relating to flood risk, in addition to Strategic Policy PS5 and policy PCYFF6 in the JLDP [RD8].

Soils and Contaminated Land

- 8.2.132 PPW [RD6] requires the protection of Best and Most Versatile (BMV) agricultural land and advises that such land should be conserved as a finite resource for the future, with considerable weight to be given to protecting such land from development (para 4.10.1). PPW [RD6] also instructs at paragraph 4.10.1 that the BMV should only be developed if there is an overriding need for the development. In addition, PPW [RD6] explains at paragraph 5.1.2 the Welsh Government's objective to promote the functions and benefits of soils, and in particular, their function as a carbon store. PPW [RD6] advises at paragraph 13.7.1 that consideration of applications should take into account the potential hazard of contamination and remedial measures where required.
- 8.2.133 Strategic Policy PS6 in the JLDP [RD8] states that planning permission will only be permitted where proposals have demonstrated with appropriate evidence that the proposals have fully taken account of and responded to safeguarding the best and most versatile agricultural land. Strategic Policy PS5 also requires that proposals should protect soil quality.
- 8.2.134 The Wylfa SPG [RD17] requires development associated with the Project to minimise the loss of the best and most versatile agricultural land. GP20 in this guidance also seeks to ensure the Project remediates contaminated soils.
- 8.2.135 Temporary land take during the construction period, across a number of landholdings, equating to approximately 1.1ha of potential BMV land and 2.1ha of non-BMV land. Land temporarily used for construction would, where feasible, be returned to the landowners in a condition comparable to that at the start of the works.
- 8.2.136 Permanent land take during the operation period, across 40 landholdings, would equate to 0.8ha of potential BMV land and 1.5ha of non-BMV land. In line with PPW [RD6] Strategic and Strategic Policy PS6 in the JLDP [RD8], which seek to conserve BMV land, the use of BMV agricultural land has been kept to a minimum. Due to the route of the existing highway and operational requirements however, the development will result in a slight loss of such land. There is an overriding need for the Proposed Development in order to accommodate the nature of traffic to be generated during the construction and operation of the Wylfa Newydd Power Station. Due to this overriding need the proposed development is considered to accord with PPW [RD6] and Strategic Policy PS6 in the JLDP [RD8].
- 8.2.137 The Environmental Report submitted in support of this planning application predicts neutral effects on soil quality. The benefits of soil and its importance as a natural resource, as outlined in PPW [RD6] and Strategic Policy PS5 of

the JLDP [RD8], has been carefully considered when selecting the proposed method of working. The works would be undertaken in accordance with the good practice soil management mitigation measures presented within the On-line Highway Improvements CoCP. The Proposed Development would minimise the impact on soil resources as far as practicable by ensuring that topsoil and subsoil is segregated at excavations which measure at least 1 metre in width.

- 8.2.138 Given the nature and limited number of potential contamination sources identified, the likelihood of ground contamination is considered to be low and effects would be minor. The Environmental Report identifies a negligible magnitude of change and a neutral effect on adjacent land uses, property and/or controlled waters from unknown contamination.
- 8.2.139 In relation to the potential for the contamination of soils resulting from accidental leaks or spillages during the construction works, the Environmental Report concludes that this would represent a negligible magnitude of change and is predicted to result in a neutral effect. This is due to the pollution prevention measures (good practice mitigation) outlined within the A5025 On-line Highway Improvements CoCP which would be implemented during construction.
- 8.2.140 The Proposed Development therefore takes into account the potential hazard of contamination as required by PPW [RD6] and also protects soil quality, consistent with Strategic Policy PS5 of the JLDP [RD8].

Climate Change

- 8.2.141 PPW [RD6] expresses a presumption in favour of sustainable development and considers climate change a key sustainability concern. Paragraph 4.11.6 in PPW [RD6] seeks good design that tackles the causes of climate change, by reducing greenhouse gas and dust emissions, and demonstrates effective adaptation. An integrated and flexible approach to design, construction and demolition is integral to a climate responsive parcel of Highway Improvements (paragraph 4.11.6).
- 8.2.142 Wylfa SPG [RD17] GP18 confirms that contribution to climate change should be minimised by the Project. Strategic Policy PS5 in the JLDP [RD8] is concerned with sustainable development and recognises energy conservation as a key component of this. This is consistent with PPW [RD6] which confirms the importance of new development minimising energy consumption.
- 8.2.143 Operation of the Proposed Development is concluded in the Environmental Report to have a negligible effect on climate change or global warming from road traffic emissions.
- 8.2.144 Positively, having a Temporary Construction Compound local to the A5025 would significantly reduce vehicle movements on the local network associated with off-site disposal and material importation. The provision of the Temporary Construction Compound would therefore help to minimise the carbon footprint of the Proposed Development. Minimisation of the carbon footprint would also be achieved through re-using recycled materials and ensuring that the Temporary Construction Compound is located in close proximity to where the highway improvement works are taking place (i.e. the A5025).

8.2.145 The Proposed Development has had thorough consideration of matters concerning both sustainability and climate change in the context of relevant adopted planning policy as well as technical guidance. A particularly important objective is that set out in PPW [RD6] regarding reducing greenhouse gas emissions.

Air Quality

8.2.146 The Wylfa SPG [RD17] at GP7 requires identification of potential health impacts and appropriate mitigation measures and confirms associated developments should not be proposed where construction activities would give rise to unacceptable impacts on air quality.

8.2.147 Horizon has fully considered the impacts of the Proposed Development and sought to minimise any adverse air quality effects. Chapter 3 in volume 1 of the Environmental Report sets out the environmental assessment process undertaken for the Proposed Development and describes how the formal stages of screening and scoping have shaped the overall approach to environmental assessment.

8.2.148 Horizon has identified human and ecological receptors as the two types of receptor most sensitive to changes in air quality and has undertaken the environmental assessment. Consideration has been given to dust emissions, emissions to air and emission from road vehicles as part of the scoping and assessment.

8.2.149 The Proposed Development will incorporate Non-Road Mobile Machinery (NRMM) emissions mitigation and good practice measures such as no engine idling, use of mains or battery-powered equipment where possible and use of plant compliant with NRMM emission standards. These measures, coupled with the relatively short duration of construction operations within each of the 300m or 600m long construction working areas and the Temporary Construction Compound, will ensure the use of NRMM during the construction of the Proposed Development will have a negligible effect on local air quality at sensitive receptors. Accordingly, this aspect was scoped out of the environmental assessment.

8.2.150 The scoping exercise concluded an air quality assessment associated with construction road traffic emissions was unnecessary as the potential effect on local air quality would be negligible.

8.2.151 Analysis of traffic forecasts at chapter 6 in volume 1 of the Environmental Report conclude that there would be no change in either the existing flows or their composition post construction of the Proposed Development. The review further identified that bend improvements to the A5025 proposed within Section 4 (Bytheicws) would effectively take operational traffic further away from human receptors when compared to the existing alignment. On this basis, Horizon consider the forecast traffic flows would be well below the thresholds set out in the EPUK/IAQM guidance (EPUK/IAQM, 2017) and the potential effect on local air quality would be negligible.

8.2.152 Horizon has assessed dust emissions in relation to the different activities and working areas associated with the Proposed Development. This has informed the identification of the appropriate and specific mitigation commensurate with the level of risk of causing dust or health effects to human or ecological

receptors, as presented in the A5025 On-line Highway Improvements CoCP. In summary, the construction activities and operations throughout Sections 1, 3, 5 and 7 (see chapter 2 in volume 1 of the Environmental Report) would represent a small dust emission magnitude when considering the construction activities against the example dust emission magnitude definitions in the *Institute of Air Quality Management (IAQM) guidance* [RD54]. Likewise, the construction activities and operations throughout sections 2, 4, 6 and 8 will also represent a small dust emission magnitude, when considered against the example dust emission magnitude definitions in the IAQM guidance [RD54]. In addition to these findings, the environmental management of the construction works and operation of the Temporary Construction Compound would be co-ordinated through the use of a Dust and Air Quality Management Plan (DAQMP), which would form part of the appointed contractor's CEMP.

- 8.2.153 The assessment undertaken has concluded that activities at the Temporary Construction Compound would be of a small dust emission magnitude, when considering the activities against the example dust emission magnitude definitions in the IAQM guidance [RD54]. The indicative layout of the Temporary Construction Compound (see figure 2-23 in volume 2 of the Environmental Report) has been optimised in such a way to reduce the potential for dust emissions. Material stockpiles, storage areas and the pavement processing plant are proposed to be located on the western side of the Temporary Construction Compound away from the A5025 and the closest sensitive receptors downwind.
- 8.2.154 The Temporary Construction Compound would also be operated in line with good practice mitigation measures which would be agreed with between the IACC and the appointed contractor via the CoCP. Accordingly, it is concluded that dust effects on residential properties close to the Temporary Construction Compound would be not significant.
- 8.2.155 In summary, the Proposed Development has had thorough consideration for its impact on air quality in the context of relevant adopted planning policy as well as technical guidance. In particular, PPW [RD6] where reducing dust emissions is an important objective.
- 8.2.156 The Proposed Development seeks to maintain and enhance relevant air quality levels and where this is not possible, appropriate mitigation measures will be put in place to ensure the amenities of identified human and ecological receptors. Importantly, facilities for the provision of an air quality and noise monitoring station would be provided in the vicinity of the properties at Bryn Tirion, within Section 4 of the Proposed Development. The detailed specification of the proposed facilities and equipment will be discussed and agreed with the IACC. It is therefore considered that the Proposed Development is in accordance with planning policies relating to air quality and climate change.

Socio-Economics

- 8.2.157 PPW [RD6] includes planning policies, to promote quality, lasting, environmentally sound and flexible employment opportunities for a low-carbon economy, and to protect and, where possible, improve people's health and well-being. Chapter 4 (Planning for Sustainability) of PPW [RD6] sets out the Welsh Government's objectives for achieving sustainable development and

chapter 7 (Economic Development) confirms the Welsh Government's objectives for economic development, i.e. development of land and buildings for activities that generate general wealth, jobs and incomes.

- 8.2.158 TAN 23 [RD38] highlights that the geographical distribution of economic benefits associated with development may be far beyond the area where the development is located. Consequently, TAN 23 [RD38] confirms that it is essential that the planning system recognises, and gives due weight to, the economic benefits associated with new developments. As such, chapter 4 in volume 1 of the Environmental Report submitted as part of this application, gives full consideration to the socio-economic impacts of the Proposed Development.
- 8.2.159 Several policies within the JLDP [RD8] require proposals to accord with a number of criteria relating to socio-economic impacts. Strategic Policy PS5 [RD8] states that development will be supported where it is demonstrated that it is consistent with the principles of sustainable development. It clarifies that proposals should accord with national planning policy and guidance, alleviate causes of climate change, give priority to effective use of land, protect, support and promote the use of Welsh language, protect and improve the quality of the natural environment and reduce the effect on local resources and water used. These matters are discussed in the above sections of this Planning Statement and it is found that the Proposed Development is consistent with the principles of sustainable development, is considerate of land use and it seeks to protect and where possible, enhance the local environment.
- 8.2.160 Strategic Policy PS9 in the JLDP [RD8] specifically concerns proposals for National Significant Infrastructure Projects and Associated Developments. This policy requires consideration to be given to the nature, scale, range and possible impact of any development. It confirms that local economic and community benefits, where feasible, need to be maximised, through agreement of strategies for procurement, employment, education, training and recruitment with the Council at an early stage of project development. This policy states that early or preparatory works for the development of the new Power Station shall demonstrate that they are necessary to ensure the timely delivery of the project.
- 8.2.161 In line with Strategic Policy PS9 [RD8] it has been demonstrated in earlier sections of this planning statement that the Proposed Development is vital to enable the delivery of the Power Station and that Horizon has sought to maximise public benefits through the delivery of the Proposed Development. For example, local employment opportunities for construction workers and opportunities where possible to achieve improvements for local communities and the environment through road design measures (for example, safer road conditions).
- 8.2.162 Effects on tourism in relation to individual tourism businesses have been considered as part of the Environmental Report assessment of effects on land use and land access. This confirmed that the Proposed Development would be expected only to potentially affect tourism in relation to a reduction in access to individual tourism businesses i.e. tourism attractions/hotspots and/or accommodation suitable for tourists, as a consequence of construction works or as an improvement in access during operation. No wider impacts on tourism are expected as a direct or indirect result of the Proposed Development.

- 8.2.163 As noted above, the Proposed Development does provide local employment opportunities for construction workers and the design has sought to minimise physical changes to PRow, cycle routes and PMA by retaining existing access arrangements to and from the highway wherever possible and, where effects are unavoidable, by providing new or modified accesses.
- 8.2.164 As confirmed at paragraph 4.4.11 of the Environmental Report, beneficial effects are likely to be realised through the provision of local employment opportunities for construction workers.
- 8.2.165 The Guiding Principles in the Wylfa SPG [RD17] are considered relevant to the socio-economic assessment of the Proposed Development and include:
- GP1: IACC will require the Wylfa NNB project promoter to support the delivery of the Energy Island Programme and Anglesey Enterprise Zone, maximising the economic opportunities available to the Island's local communities;
 - GP2: Local job creation and skills development through the implementation of an Employment and Skills Strategy, which should include the maximisation of local labour provision;
 - GP5: Supporting the visitor economy and ensuring that the construction and operation of the NNB and any associated developments do not adversely affect the value and importance of tourism to the Island. One of the key elements of the island's tourism offer being the quality and diversity of its natural and historic environments. This includes the 125 mile coastline and the numerous beaches linked by the Wales Coast Path; and
 - GP6: Maintaining and Enhancing Community Facilities and Services, including education, healthcare and leisure facilities.
- 8.2.166 Whilst the Welsh language and culture are important socio-economic considerations, these are covered separately in Section 8 of this Statement and are further investigated in the WLIA submitted in support of this application.
- 8.2.167 The WLIA also identifies that the construction of the Proposed Development is likely to result in several beneficial effects in terms of socio economic impacts. Beneficial effects are likely to be realised through the provision of local employment opportunities for construction workers.
- 8.2.168 The majority of workers expected to be locally-based, within the DCCZ, and further beneficial effects from indirect job creation which, in turn, allows Welsh speakers to stay in their communities.
- 8.2.169 It is anticipated that construction would be carried out over a 66-week period (excluding a 4-week restoration period for the Temporary Construction Compound). Based on design inputs of 125 workers required throughout the duration of construction, this results in an estimate of 159 job-years of employment (where one job-year equates to one job held for one year) as a direct result of the construction.
- 8.2.170 Around 75% of workers (94) are anticipated to be DCCZ residents and 48.1% of DCCZ residents working within the construction industry on Anglesey are

reported to be Welsh speakers. If the construction workforce were to reflect these figures, then approximately 45 of the construction workers would be Welsh speakers.

- 8.2.171 In addition, upon completion of the construction work, the Proposed Development will improve the access to local services and facilities, to the benefit of the local population and by extension Welsh speakers.
- 8.2.172 Importantly, the Proposed Development is also predicted to result in beneficial effects to local businesses along the route of the Proposed Development due to increase spend from the presence of up to 125 construction workers over a 66-week period. Additionally, local businesses and primarily suppliers in the DCCZ are expected to be beneficially affected by the increase spend to support the construction work.
- 8.2.173 It is expected that the customers of a small number of businesses along the A5025 within Sections 1 to 8 could experience travel disruption. This could potentially lead to a loss of passing trade for the businesses (described in table 4-2 in volume 1 of the Environmental Report and shown in figure 4-1 and figure 4-2 within volume 2 of the Environmental Report), resulting in a negative impact during construction. However, given the temporary periods that businesses would be affected (i.e. the fixed construction period for each section), the resulting effect would be limited.
- 8.2.174 While minor delays are expected for people accessing community services via the A5025, the degree of severance is considered to be low as no communities would be severely hindered or restricted from making regular journeys to/from facilities or services.
- 8.2.175 There are expected to be slight negative short term impacts due to temporary land take and access restrictions during the construction and operation periods.
- 8.2.176 Permanent land take would largely comprise small areas of agricultural land immediately adjacent to the existing highway boundary. The design of the Proposed Development has been developed so that the majority of permanent land take is contained within the existing highway boundary. Where widening outside of the highway boundary is required, no adverse effects are anticipated due to the size of the areas involved and the fact that the widening would not result in the severance of existing field boundaries. The majority of permanent land take of agricultural land would therefore not have a material effect on existing farm holdings or long-term viability.
- 8.2.177 Measures to avoid prolonged disruption or restrictions to PMA would be undertaken by the appointed contractor as part of construction traffic management (refer to the A5025 On-line Highway Improvements CoCP), and standard approaches to communication of disruption with residents and businesses would also be implemented.
- 8.2.178 Given that limited negative socio-economic effects and some beneficial effects have been identified as a result of the Proposed Development and as measures such as the CoCP will be in place, it is considered that the application meets the requirements of the relevant planning policies discussed above.

Local Amenity

- 8.2.179 With regard to effects on residential amenity generally, Policy PCYFF2 in the JLDP [RD8] confirms that planning permission will be refused where the development would have an unacceptable impact on the health, safety or amenity of occupiers of local residencies, other land and property uses or characteristics of the locality due to increased activity, disturbance, vibration, noise, dust, fumes, litter, drainage, light pollution or other forms of pollution or nuisance.
- 8.2.180 The Wylfa SPG [RD17] at GP7 requires identification of potential health impacts and appropriate mitigation measures and confirms associated developments should not be proposed where construction activities would give rise to unacceptable impacts on air quality, noise/vibration and light pollution and the amenity of the existing residents, visitors, businesses and construction workers.
- 8.2.181 The above requirements reflect the provisions of PPW [RD6], which requires amenity to be protected, and includes a requirement to undertake careful assessment of likely noise levels and to prevent light pollution.
- 8.2.182 With regards to the impact of the Proposed Development in terms of noise and vibration, the contractor will apply to the IACC for an agreement under Section 61 of the *Control of Pollution Act 1974* [RD55] for all construction works. This may include agreements on hours of working and limits on noise and vibration. Given that no significant noise and vibration effects have been identified in the Environmental Report as a result of the Proposed Development with identified mitigation (e.g. monitoring of noise and vibration levels where necessary during construction works and implementation of corrective actions in instances where agreed noise limits have been breached), it is considered that the application meets the requirements of the relevant planning policies noted above.
- 8.2.183 During construction, changes in views from residential properties and footpaths would combine with noise to adversely alter people's experience of the landscape, reduce tranquillity and alter their overall amenity. Mitigation proposed includes:
- Minimising temporary lighting during construction activities, in order to reduce the effects of lighting in receptor night-time views;
 - Management of landscaping to ensure all such measures establish successfully and are maintained. Details of the measures are contained in the A5025 On-line Highway Improvements Design Approach and Landscape Strategy, which forms part of the planning application documentation; and
 - Optimisation of the attenuation pond design within Section 2, as part of detailed design, to improve the integration of these features into the receiving landscape pattern.
- 8.2.184 Given that the majority of the adverse effects would be temporary and only occur during the construction phase, and given the mitigation proposed to limit the impacts as far as possible, it is considered that the Proposed Development

is acceptable in local amenity terms and in line with policy PCYFF2 in the JLDP [RD8] and the Wylfa SPG [RD17] GP7.

8.2.185 It is considered unlikely that there would be in-combination effects during the operation of the Proposed Development (please see chapter 15 in volume 1 of the Environmental Report for further details) and as such the Proposed Development is considered acceptable.

8.3 Conclusions

8.3.1 The above sections demonstrate consideration of potential impacts resulting from the Proposed Development and assesses the Proposed Development against relevant planning policies. This finds that the Proposed Development assists in meeting the Welsh Government and IACC's aspirations for transport improvements and that they have been sensitively designed to respect the surrounding environmental and social context. They are therefore found to be acceptable in light of the adopted policy against which the Proposed Development should be considered.

9 Mitigation

9.1 Background and Approach to Mitigating Project-Wide Effects

- 9.1.1 This chapter sets out the approach to mitigation required in order to undertake the Proposed Development in a manner which would reduce effects of the development and result in the works being undertaken in an appropriate way. The requirement for this mitigation is identified in the application supporting documents which assess the impacts of the Proposed Development. It is important to note however that, where possible, mitigation has been incorporated into the design of the Proposed Development.
- 9.1.2 Where necessary, additional mitigation will be secured by conditions imposed on the planning permission.
- 9.1.3 Determination of required mitigation is evidence and impact led, based on the assessments which support the planning application.
- 9.1.4 The approach has been informed by the 'Towards a Common Approach on Community Benefits arising from the Wylfa Newydd Project' document. This joint position statement between Horizon and IACC refers to the Project as a whole and sets out the key principles of how community benefits will be optimised, including ways in which to make a clear distinction between matters requiring mitigation as a result of the impact of the proposed works and voluntary community benefits (which cannot be taken into account when determining planning applications).

Planning Conditions

- 9.1.5 Discussion with IACC and stakeholders regarding necessary planning conditions will be subject to ongoing negotiation during consideration of the application.
- 9.1.6 The conditions are prepared in the context of statutory requirements, which confirm conditions should only be imposed where they satisfy six tests that conditions should be:
- necessary;
 - relevant to planning;
 - relevant to the development to be permitted;
 - enforceable;
 - precise; and
 - reasonable.

Legal Agreement

- 9.1.7 Horizon is finalising an agreement under Section 278 of the Highways Act 1980 that will cover the implementation agreement of the works. This enables IACC to secure assurance that does not expose the Local Highway Authority to unreasonable risks as a consequence of the works.

Code of Construction Practice

- 9.1.8 Good construction site management practices would be utilised during the construction of the Proposed Development. A CoCP has been developed as part of the Environmental Report process and has been submitted with the planning application. The contractor will prepare a Construction Environmental Management Plan (CEMP) based on the principles set out in the CoCP.
- 9.1.9 Subject to the imposition of suitable planning conditions, the effects of the Proposed Development would be appropriately mitigated such that any residual effects are outweighed by the benefits which the Proposed Development facilitate.

10 Summary and Conclusions

- 10.1.1 This Planning Statement has been prepared by Horizon to support an application seeking planning permission for the Proposed Development.
- 10.1.2 The Proposed Development is required to upgrade an existing route with pavement reconstruction, localised widening, surface dressing, improved new signage and road markings, all largely within the existing highway boundary.
- 10.1.3 These improvements are a key component of Horizon's embedded mitigation that would reduce potentially adverse effects of the Project, particularly for people living near the A5025.
- 10.1.4 The context in which this planning application is made is assessed in the preceding chapters and it is demonstrated there is a significant and urgent requirement for new energy generation from low carbon sources, with significant new deployment required by 2025. The Proposed Development is a key component of delivering the Project as early as possible to assist in meeting national policy aims towards the urgent delivery of low carbon energy. This should be given substantial weight in favour of the Proposed Development application being granted.
- 10.1.5 A planning assessment of the impacts of the Proposed Development on matters identified as material to the determination of the application has shown that, with appropriate mitigation, effects are considered to be acceptable.
- 10.1.6 The methodology for securing mitigation is outlined above. Securing of the required mitigation in an appropriate manner would ensure that residual effects of the development are reduced as far as possible.
- 10.1.7 The Proposed Development includes a number of significant benefits and are appropriate in land use planning terms, in particular:
- the principle of development is acceptable and is supported by adopted planning policy;
 - the Proposed Development will address existing physical and operational constraints on the A5025 between Valley and the proposed Power Station Access Road Junction and mitigate the predicted impacts of increased traffic associated with the construction and operation of the Project;
 - the Proposed Development have been sensitively designed to respect the scale and character of the surrounding area, and to prevent as far as possible any adverse impacts on surrounding residential amenity, ecological receptors and the setting of heritage assets. The majority of the Proposed Development will take place within the existing carriageway with some widening and surface treatments, for example, surface dressing of the existing road surface and reconstructing part of the existing highway pavement;
 - creation of additional jobs and encouragement of use of local employment opportunities during construction; and
 - enhanced journey conditions for non-motorised users travelling along the A5025 through improved road surfacing.

10.1.8 Taking the above matters into account, the Proposed Development is considered to be acceptable in planning terms and is consistent with the adopted Development Plan. Planning permission for the Proposed Development should therefore be granted.

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Table 11-1 Schedule of references

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