

DESIGN COMMISSION FOR WALES COMISIWN DYLUNIO CYMRU

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Dear Kath

North Wales Grid Connection - National Grid, Ynys Môn Isle of Anglesey

Thank you and the team from the Local Authority (LA) for joining us during the meeting of Thursday 18th May 2017 here at the Commission. We have set out below a brief overview, our evaluation of the issues raised at this stage in the proposals and options the LA may wish to consider given the current stage of project evolution. We have held the correspondence pending a conversation with the team beforehand, hence the slight delay in us sending it through.

Overview and context

The North Wales Grid Connection proposals by National Grid are considered as an NSIP (Nationally Significant Infrastructure Project), subject to the Planning Inspectorate (PINS) Development Consent Order (DCO) process. It proposes a linear 30km 400KV electricity grid connection across Anglesey from the Wylfa Newydd nuclear power station to the Pentir substation on the mainland. National Grid propose the new connection to be above ground, via pylons, following a similar route alignment to the existing connection. The route crosses the Menai Strait and a 4km tunnel under the Strait is also proposed, with an estimated construction time of four years. Sealing End Compounds and Tunnel Head Houses will be required either side of the Menai crossing.

The project will require numerous construction compounds with the main compound proposed to be located to the east of Llangefni. The DCO will also include access for construction, haul roads and maintenance requirements.

The linear route across the Isle of Anglesey passes through the administrative boundaries of the Cyngor Sir Ynys Môn Isle of Anglesey County Council and Cyngor Gwynedd Council. The route is mainly aligned through undulating pasture, and will affect designated landscapes including Areas of Outstanding Natural Beauty (AONB), Special Areas of Conservation (SAC), Heritage Coast and Sites of Special Scientific Interest (SSSI) as well as numerous properties and dispersed settlements. The landscape is generally open in character with panoramic views being widely available. Views also feature the extant power lines that cross the island, connecting the existing power station to the mainland.

National Grid proposes a new series of pylons, for the most part, closely following the alignment of the existing connection. We are given to understand that the existing connection needs to be retained, resulting in a double row of pylons across the landscape.

The Section 42 Consultation took place October – December 2016. It is expected that National Grid will submit an application to PINS in October 2017. The project is currently undergoing Environmental Impact Assessment (EIA) which is likely to identify sensitive receptors and requirements for mitigation.

The Isle of Anglesey County Council (IACC) are firmly opposed to the over ground, pylon proposal and would prefer a solution with full undergrounding of the grid connection. However, the Commission is given to understand that National Grid considers the resulting cost of undergrounding to be significant and prohibitive.

Consultation with the Design Commission for Wales

The appropriate means of consulting the Design Commission for Wales is described in its published guide to its national Design Review Service. The Commission cannot provide independent expert comment through any other means. Using the Design Review Service affords the opportunity for long term engagement and access to specialist knowledge and multi-disciplinary expertise and experience on a range of development, including large scale transport and energy infrastructure. National Grid has not to date taken advantage of the service.

This meeting arises from a request via the Local Authority to which the Commission has responded. National Grid was not represented at the meeting.

Due to the late stage in the 'design' process in which this review meeting took place, there is perhaps limited opportunity to influence National Grid's design approach and strategy which appears to have been decided and we understand will be 'fixed' very shortly.

Nevertheless there is scope for the outcome of the discussion to be of use to the Local Authority in their desire to achieve the best possible outcome for Ynys Môn and to

pursue their commitment to their duty toward the Well-being of Future Generations Act Wales.

The Local Authority, supported by their consultants, may consider the following opportunities even at this late stage, prior to formal DCO submission and during consideration of the proposals by the Planning Inspectorate through its examination processes.

The Local Authority may:

- Appraise the justifications made for pylon or underground solutions, in order to reach a point where they have confidence in a solution that clearly demonstrates public value over the long term for the level of public investment.
- Identify, prioritise and communicate the most important areas for mitigation.
- Consider and influence the detail design of associated structures and landscape design.
- Clearly communicate to the public the impacts and issues associated with pylon and underground options and the process which has resulted in the proposed solution.

Appraisal and justification

The council must have confidence in and be able to clearly explain to the public the measures it has taken to understand the rationale behind National Grid's proposal. They wish to be able to demonstrate that they have done all they can to ensure the scheme represents best value for public money, that environmental impacts of all options have been fully considered, and the best design quality has been achieved. It is evident that there is much public concern and opposition to the pylon scheme in favour of complete undergrounding of cables. In order to take a balanced view on the arguments for overhead and underground solutions, the council must receive and fully understand the following information:

- Assurance from National Grid that they have fully explored and tested all feasible options and variations, both overhead and underground and that the assurance includes material which demonstrates current engineering and construction methods capable of reducing negative impact at all stages.
- The extent to which the National Grid proposals follow the Holford Rules.
- Proven costs associated with options.
- Assurance that the environmental effects of a range overhead and underground options have been assessed, the impacts compared and effects both during construction and in operation considered.
- Likely impacts of different options on:
 - Ecology
 - Protected landscapes

- Travel
- o Tourism
- Economy/industry
- Archaeology and heritage
- Health and well-being
- Construction processes, timing and impacts associated with options.
- The cumulative effect of a second run of pylons.
- The implications of a scheme which alternates between overhead and underground, and the scale and impact of the structures required at the change points.

A more detailed study of the proposed connection under the Menai would also be useful. This should fully consider such issues as the best location for the point of undergrounding, the nature and scale of the tunnel access points and their associated buildings and infrastructure and effects during construction, for example. In order to fully understand the visual impacts, accurate visualisations from viewpoints agreed with the local authority will be required.

With all of the above information made available to it, the Council will be better placed to ascertain whether the best option has been arrived at.

Enhancement and mitigation approaches

Early identification and prioritisation of opportunities for enhancement and mitigation is important and could have a significant impact on the overall quality and value of the scheme for local communities and tourism. Any planting or other mitigation measures should be appropriate to Anglesey and the local character of the landscape/place.

These opportunities may include, but are not limited to:

- Reinforcement and improvement to the condition of the landscape character rather than attempts to screen views of pylons and other structures. Screening such a large, linear feature within the gently undulating landscape would likely only be feasible from specific, sensitive locations at a distance from the connection.
- Strategic use of S106 funding
- Improvements to community facilities
- Wide ranging mitigation measures during construction period beyond the normal minimum standards so as to reduce impact upon residents/ tourism.
- Reuse of excavated material to minimise heavy vehicle movements and resulting traffic.
- Diversification of land cover during restoration works increasing biodiversity through re-planting of meadows/hedgerows/woodland.

 Improvements to the local road network will be required for construction access and temporary road closures. Diversions will also likely be required to the local footpath network. These works offer the opportunity for improvements to local communities and aid with accessibility.

<u>Design Principles Document - Influencing detail design and quality</u>

Whether the scheme goes ahead as proposed by National Grid or otherwise, it is important that the Local Authority takes the opportunity to contribute to and place requirements upon the detail design to maximise quality and value. Site-specific infrastructure design for the tunnel heads, for example, would be of benefit.

A Design Principles document would be a useful tool for the council to help secure genuine commitment to design quality on the structures and landscape associated with the proposal, potentially contributing to part of a statement of common ground. The Design Commission may also be in a position to comment further when this document is in draft form.

In such a document we would expect to see a recognised design process – including informative site analysis and iterative testing and refinement of options – undertaken for all parts of the scheme. In addition, there should be a strategic approach to the scheme as a whole which ties individual structures and elements together providing coherence to the whole. There may also be value in considering the grid connection project alongside proposals for other development associated with the Wylfa Newydd scheme. The Commission's reports on its long term consultative process on Wylfa Newydd may be informative and can be found on our website via the link at the end of this letter.

Communication collaboration and community involvement

Clear communication of the impacts, effects, benefits and value of the different options – both during construction and long term – will be crucial. Pylons have an obvious visual impact, but the disruption and impact on the landscape of an underground solution would also be substantial. It is important that this is made clear to local people so that they understand the justification for decisions and know what to expect in the future.

Better engaging people in the design and planning process can help understanding and inclusion. Our understanding is that there is currently a sense of imposition. National Grid even at this stage could make a commitment to better communication and collaboration with the Council and with the people of Ynys Môn. Whilst it is understood that there is a statutory body at work here, greater collaboration with the Council and creating better opportunities to involve local people in planning enhancements to landscapes, roads and footpaths and community facilities would be a positive step.

Further consultation

These proposals are significant and every effort should be made to ensure the right decision is made and can be fully justified. The Commission would welcome the opportunity for further consultation with all parties, and suggest that a future meeting to consider a design principles document and mitigation strategies is attended by National Grid representatives as well as the local authority, design team and other consultants.

We very much hope this is helpful to you and the council and we will be happy to answer any further queries you may have.

Yours sincerely

Carole-Anne Davies Prif Weithredwr Chief Executive cad@dcfw.org

Appendices: Details of the Chair and Panel, Attendees and Observers

Useful Links

DCFW Panel:

Chair Jen Heal, Design Advisor, DCFW

Lead Panellist Mark Lawton

Steven Smith Andrew Linfoot

Amanda Spence, Design Advisor, DCFW

Carole-Anne Davies, CE, DCFW

Presenting Team: Efan Milner, PPA Lead

Ben Oakman, Arup Kath Hadrell, IACC/Arup Annwen Morgan, IACC Liz Dunn, Burges Salmon

Observing: Jamie Yeoman, DCFW Panellist

Kym Scott

Alexandra Lavagna Magda Fabisiak

Ben Terry, Monmouthshire CC

http://dcfw.org/consulting-the-commision-through-the-design-review-service/http://dcfw.org/?s=Wylfa&cat=3&x=0&y=0