

5 PLANNING POLICY

5.1 Introduction

5.1.1 This chapter of the Environmental Appraisal identifies those adopted and emerging planning policies that are relevant to the Proposed Project. It covers policy at the national and local level and includes consideration of National Policy Statements (NPS), Planning Policy Wales (PPW), Minerals Planning Policy Wales, National Development Framework (NDF), Technical Advice Notes (TANs), Strategic Development Plans, and Local Development Plans associated with the Local Authorities (Gwynedd Council and Snowdonia National Park Authority). In addition, as the Proposed Project includes works within the Dwyryd Estuary, consideration has also been paid to the recently published Welsh National Marine Plan.

5.1.2 This chapter examines the extent to which the Proposed Project complies with the relevant planning policy framework. It draws on the findings of the remainder of this Environmental Appraisal and other relevant material planning considerations associated with the Proposed Project.

5.2 National Planning Policy

5.2.1 The Overarching NPS for Energy (EN-1) is part of a suite of NPSs issued by the Secretary of State for Energy and Climate Change. It sets out the Government's policy for delivery of major energy infrastructure. Taken together with NPS EN-1, the NPS for Electricity Networks Infrastructure (EN-5) provides the primary basis for decisions taken by the Infrastructure Planning Commission (IPC) on applications it receives for electricity networks infrastructure.

5.2.2 In England and Wales both NPSs are likely to be a material consideration in decision making on applications that fall under the Town and Country Planning Act 1990 (as amended). Whether, and to what extent is judged on a case by case basis.

5.2.3 Planning Policy Wales (PPW) (Welsh Government, 2018)¹ sets out the land use planning policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes (TANs), circulars and policy clarification letters, which together with PPW comprise national planning policy. They may be material to decisions on individual planning applications.

5.2.4 The PPW lists five key principles to act as a framework for regional and local development plans to be built on. The five key principles are:

- Growing our economy in a sustainable manner
- Making best use of resources
- Facilitating accessible and healthy environments
- Creating & sustaining communities
- Maximising environmental protection and limiting environmental impact

5.2.5 On 7th August 2019 the Welsh Government launched consultation on the new National Development Framework (NDF) which will look to set the direction of development in

¹ Welsh Government. Planning Policy Wales (PPW) (Edition 10) – December 2018

Wales from 2020 to 2040. The NDF will set a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, decarbonisation, developing resilient ecosystems and improving the health and well-being of our communities. The framework will be built on by Strategic Development Plans (SDPs) at a regional level and Local Development Plans (LDPs) at local authority level. These plans will identify the location of new infrastructure and development. SDPs and LDPs will be required to be in conformity with the NDF and must be kept up to date to ensure they and the NDF work together effectively. Planning decisions at every level of the planning system in Wales must be taken in accordance with the development plan as a whole.

5.2.6 The draft NDF currently sets 11 outcomes of where the Welsh Assembly Government expect to be in 20 years' time. The 11 outcomes are:

A Wales where people live....

1. and work in connected, inclusive and healthy places
2. in vibrant rural places with access to homes, jobs and services
3. in distinctive regions that tackle health and socio-economic inequality through sustainable growth
4. in places with a thriving Welsh Language
5. and work in towns and cities which are a focus and springboard for sustainable growth
6. in places where prosperity, innovation and culture are promoted
7. in places where travel is sustainable
8. in places with world-class digital infrastructure
9. in places that sustainably manage their natural resources and reduce pollution
10. in places with biodiverse, resilient and connected ecosystems
11. in places which are decarbonised.

5.2.7 As above, Technical Advice Notes (TANs) provide detailed planning advice. Local planning authorities take them into account when they are preparing development plans. Relevant TANs to be considered are:

- Technical Advice Note (Wales) 5 – Nature Conservation and Planning (Sept 2009)
- Technical Advice Note (Wales) 11 – Noise (Oct 1997)
- Technical Advice Note (Wales) 14 – Coastal Planning (Mar 1998)
- Technical Advice Note (Wales) 15 – Development and Flood Risk (Jul 2004)
- Technical Advice Note (Wales) 16 – Sport, Recreation and Open Space (Jan 2009)
- Technical Advice Note (Wales) 18 – Transport (Mar 2007)
- Technical Advice Note (Wales) 20 - Planning and the Welsh Language (Oct 2017)
- Technical Advice Note (Wales) 21 – Waste (Feb 2014)
- Technical Advice Note (Wales) 23 – Economic Development (Feb 2014)
- Technical Advice Note (Wales) 24 – The Historic Environment (May 2017)

5.2.8 The Welsh National Marine Plan (Welsh Government, 2019)² represents the start of a process of shaping the country's seas to support economic, social, cultural and environmental objectives. It is a plan for the inshore and offshore marine plan regions and has been prepared and adopted under the Marine and Coastal Access Act (MCAA) 2009³ for the purposes of Section 51 of the MCAA and in accordance with Schedule 6 of the MCAA and in conformity with the UK Marine Policy Statement (MPS)⁴. The Plan and supporting material should be used by applicants to shape proposals and licence applications, public authorities to guide decision making, and other users to understand Welsh Government's policy for the sustainable development of the Plan area.

5.3 Local Planning Policy

5.3.1 The Site Boundary lies within the administrative boundary of Gwynedd Council and Snowdonia National Park Authority.

Gwynedd Council

5.3.2 In determining the planning application, Gwynedd Council will take into account the following development plan documents:

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

5.3.3 The Anglesey and Gwynedd Joint Local Development Plan was adopted on 31 July 2017, which supersedes the previous plans and interim policies that were established in both of these regions. The Joint Local Development Plan is the foundation on which decisions on land use planning will be made within the boundaries of Anglesey and Gwynedd Council up to the year 2026. The Local Development Plan is taken into account when reviewing planning applications and the impacts which affect the towns, villages and countryside of Anglesey and Gwynedd.

Snowdonia National Park Authority

5.3.4 Several components of the Proposed Project which require planning permission are located within Snowdonia National Park Authority. Therefore, relevant policies from the following Snowdonia National Park Authority development plan documents will also be taken into account:

- Snowdonia National Park Authority – Eryri Local Development Plan (2007 – 2022)

5.3.5 Snowdonia National Park Authority adopted a revised Eryri Local Development Plan on 6 February 2019. The Local Development Plan is a material consideration in the determination of planning applications within the National Park. The revised Eryri Local Development Plan (2016-2031) replaces the Eryri Local Development Plan (2007-2022).

5.3.6 The extent to which the Proposed Project complies with relevant policies of the Anglesey and Gwynedd Joint Local Development Plan and the Eryri Local Development Plan are

² Welsh Government. Welsh National Marine Plan – November 2019

³ www.legislation.gov.uk/ukpga/2009/23/contents

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www.assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69322/pb3654-marine-policy-statement-110316.pdf

shown below, in Tables 5.1 and 5.2 respectively. Local plan designations are presented in Figure 5.1.

- Snowdonia National Park Authority – Supplementary Planning Guidance

5.3.7 Supplementary Planning Guidance (SPG) provides further detailed information in support of the Eryri Local Development Plan and provides guidance about the manner in which the Authority will deal with planning applications. They are used by the Authority in decision making and are material considerations – the following of which are relevant to the Proposed Project:

- Sustainable Design in the National Parks of Wales (Sept 2011)
- General Development Considerations (Sept 2011)
- Nature Conservation and Biodiversity (Oct 2016)
- Enabling Sustainable Development in the Welsh National Parks (May 2015)
- Landscape Sensitivity and Capacity Assessment (Oct 2016)
- Obtrusive Lighting (Light Pollution) (Oct 2016)

5.3.8 Each of these SPGs provides further detail in support of the Local Development Plan. Policies within the Local Development Plan have been written to accord with the SPGs unless otherwise stated. Where relevant the SPGs have been referred to in the technical chapters of this Environmental Appraisal.

Policy Assessment

5.3.9 The extent to which the Proposed Project complies with relevant policies of Gwynedd Council and Snowdonia National Park Authority are outlined within Table 5.1 and 5.2 below.

Table 5.1: Relevant policies from Anglesey and Gwynedd Joint Local Development Plan (2011 – 2026)

Policy Summary	Policy Assessment
<p>Policy PS 1 (Welsh Language and Culture) The Councils expect new development to promote and support the use of Welsh language. Dependent on the scale of the workforce required would require a Welsh language impact assessment and also requires proposals to use a bilingual Signage Scheme to deal with all operational signage in the public domain.</p>	<p>The Proposed Project was subject to a detailed scoping exercise, in order to focus environmental reporting on the key environmental issues likely to be encountered. The scoping exercise involved a review of available documentation related to the existing environment; consultation with statutory and non-statutory bodies with knowledge of the local area; preliminary desk-based and site-based appraisals and surveys; and knowledge of potential environmental impacts.</p> <p>Potential effects on the Welsh language were scoped out of the assessment as the numbers and duration of construction is unlikely to result in any effects on the Welsh language. A Welsh Language Statement has been prepared and is provided in support of the planning application.</p>
<p>Policy ISA 1 (Infrastructure Provision) Proposals will only be granted where adequate infrastructure capacity exists or where it is delivered in a timely manner. Where proposals generate a directly related need for new or improved infrastructure and this is not provided by a service or infrastructure company, this must be funded by the proposal.</p>	<p>The overall scope of the Proposed Project is to deliver new infrastructure in order to mitigate the visual impact of existing electrical infrastructure in nationally protected landscapes by removing overhead lines and routing the high voltage system underground.</p> <p>All above ground structures have been designed to minimise their visual impact and fit in with the environment and surroundings. Construction compounds, laydown areas and temporary access tracks will be required to facilitate construction activities but will be reinstated following completion of construction.</p> <p>Third party assets including a water pipeline and wooden pole overhead line will be diverted in accordance with operator requirements. Furthermore, an exclusion zone will be applied to a high-pressure gas pipeline in accordance with operator requirements.</p>

Policy Summary	Policy Assessment
<p>Policy TRA 4 (Managing Transport Impacts) Proposals should be planned and designed in a manner that promotes the most sustainable modes of transport having regard to a hierarchy of users. Proposals that would cause unacceptable harm to the safe and efficient operation of the highway, public transport and other movement networks including pedestrian and cycle routes, public rights of way and bridle routes, will be refused.</p>	<p>The Proposed Project would temporarily increase the traffic flows on the surrounding roads used by construction vehicles.</p> <p>This additional traffic may impact road users on a temporary basis including other drivers using the roads, cyclists, pedestrians, and the effects could include delays, difficulty in reaching local amenities or accessing roads, or real or perceived increases in accident risk.</p> <p>Chapter 12 (Traffic and Transport) considers the busiest period of construction to be where the tunnel shaft and tunnel activities are taking place at the same time.</p> <p>An Outline Construction Traffic Management Plan (OCTMP) (Appendix 6 of the CEMP) has been prepared which sets out measures which have been included within the design of the Proposed Project and would be implemented, where required, to reduce effects of traffic during the construction phase of the Proposed Development. The final plan would be developed by the appointed contractor.</p> <p>Taking these measures into account, all roads were assessed as having no unacceptable effects.</p> <p>Once constructed, the only traffic movements generated would be for infrequent, routine maintenance and inspections.</p> <p>Due to decommissioning not expected to take place for several years it is difficult to assess the effects at this time. However, traffic generated is not expected to exceed the levels forecast during construction.</p>
<p>Policy PS 5 (Sustainable Development) Development will be supported where it is demonstrated that they are consistent with the principles of sustainable development.</p>	<p>National Grid plays an important role in the sustainable development of Great Britain's energy sector. National Grids stakeholders expect them to deliver energy sustainably while balancing that with the need to provide security and affordability. It is National Grid's job to facilitate an energy system that delivers value for consumers and society.</p>

Policy Summary	Policy Assessment
	<p>National Grid's Environmental Sustainability Policy, as detailed in the Outline Construction Environmental Management Plan (CEMP) (Appendix 2A) commits National Grid and the appointed Principal Contractor to:</p> <ul style="list-style-type: none"> • Identifying environmental risks, including climate change, and developing plans to mitigate them. • Protecting the environment by ensuring prevention of pollution is a key consideration in the design of all assets. • Using resources more efficiently by using sustainable materials and reducing waste. • Identifying opportunities to use alternatives to hazardous materials. • Seeking ways to enhance the natural value of the areas they work for the benefit of local communities and the environment. • Ensuring all employees have the training, skills, knowledge and resources necessary to achieve the requirements of their internal standards. • Setting expectations of those who work on their behalf to demonstrate the same commitment to the environment as they do and working with their supply chain to contribute to the delivery of National Grids 'Our Contribution' targets. • Continually improving the Environmental Management System by reviewing and challenging performance using feedback from stakeholders and benchmarking against contemporaries. <p>Consultation and stakeholder input has been integral to the design and development of the Proposed Project and National Grid has worked closely with Gwynedd Council (GC), the Snowdonia National Park Authority (SNPA) and key stakeholders in developing the project.</p>
<p>Policy PS 6 (Alleviating and Adapting to the effects of Climate change) In order to alleviate the effects of climate change, proposals will only be permitted where it is demonstrated that they have fully taken account of and responded to the following:</p> <ul style="list-style-type: none"> • The energy hierarchy 	<p>The CEMP (Section 3.3) describes how the Contractor is responsible for managing materials and resources used on Site and for managing waste arising from all activities in order to prevent pollution and to meet or exceed legal requirements.</p>

Policy Summary	Policy Assessment
<ul style="list-style-type: none"> Reducing greenhouse gas emissions, help to reduce waste and encourage travel other than by car 	<p>The Contractor shall prepare a Site Waste Management Plan (SWMP) and shall use materials and methods so that waste is minimised and any waste that is produced can be re-used, recycled or recovered in other ways before disposal options are explored. The SWMP will contain information on the amount and type of waste that will be generated from the site.</p>
<p>Policy PCYFF 1 (Development Boundaries)</p> <p>The Plan identifies Development Boundaries for the Sub-regional Centre, Urban Service Centres, Local Service Centres, Service Villages and Local / Rural / Coastal Villages.</p> <p>Outside the development boundaries development will be resisted unless it is in accordance with specific policies in this Plan or national planning policies or that the proposal demonstrates that its location in the countryside is essential.</p>	<p>Due to its linear form the Proposed Project sits outside the development boundaries. However, it represents a major opportunity to mitigate the visual impact of existing electricity infrastructure within and adjacent to the Snowdonia National Park and to conserve and enhance the natural beauty, wildlife and environmental heritage of the area.</p>
<p>Policy PCYFF 2 (Development Criteria)</p> <p>A proposal should demonstrate its compliance with:</p> <ol style="list-style-type: none"> Relevant policies in the Plan; National planning policy and guidance. <p>Proposals should:</p> <ol style="list-style-type: none"> Make the most efficient use of land, (...); (...) Include provision for storing, recycling and waste management during the construction period and occupancy period; Include, where applicable, provision for the appropriate management and eradication of invasive species; 	<p>The Outline CEMP (Appendix 2A) acknowledges that the Proposed Project will lead to some permanent loss of land which will result in the potential for a permanent reduction in agricultural land area that can be farmed.</p> <p>The Contractor will produce a CEMP which will include a number of best practice techniques for the prevention of pollution, drainage and soil management which will also mitigate the potential effects to land use and agriculture.</p> <p>The Contractor shall take all reasonable precautions to ensure that livestock is kept away from the construction zone and protected from dust, and excessive noise.</p> <p>All land taken for the temporary works shall be reinstated back to its original condition upon completion of the main works.</p>

Policy Summary	Policy Assessment
<p>Additionally, planning permission will be refused where the proposed development would have an unacceptable adverse impact on:</p> <ol style="list-style-type: none"> 7. The health, safety or amenity of occupiers of local residences, 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. Land allocated for other development/ uses. 	<p>With respect to the Cilfor construction compound, the Contractor shall seek to limit the creation of any temporary compounds within the Site Boundary. Those that are required must limit the damage to the land and demonstrate to the client that the size is required.</p> <p>The CEMP (Section 3.4) documents how the Contractor shall provide and maintain all lighting for the construction works and the site welfare and site security cabins shall include low level lighting. Motion sensor lighting shall be used in areas of high security risk and access and egress.</p> <p>The CEMP (Section 3.8) details how the Contractor shall make available a suitable quantity of pollution control equipment that is always readily available at the Site and checked on a weekly basis to ensure that they are available. The Contractor shall make provisions for access to more sophisticated containment/clean-up equipment such as sorbent booms, river booms etc.; which shall be 'boxed' and readily transportable at the construction base/site establishment and available for immediate dispatch to a spillage.</p> <p>The CEMP provides further detail relating to storage and handling requirements, fuel tanks, mobile bowsers and bunds, drum storage, flammable and hazardous substances, deliveries and dispensing, vehicles and plant and road sweeping.</p> <p>The CEMP (Section 3.14) explains how the Contractor shall minimise air quality impacts from the construction works, with particular attention given to the tunnel construction ventilation system, any spoil transport systems installed and mitigation measures to reduce the effect of dust and emissions from construction activities.</p> <p>The CEMP (Section 3.15) explains how the Contractor shall follow the recommendations set out in BS5228, and current guidelines set down by the HSE.</p>

Policy Summary	Policy Assessment
	<p>The Contractor will comply with the noise regulations or restrictions imposed by the Local Authorities and will apply to the Local Authorities for prior consent under Section 61 of the Control of Pollution Act for noisy activities.</p> <p>The Contractor shall implement all noise control measures required to meet any noise limits agreed with the Local Authorities. The Contractor will submit method statements for all demolition works to National Grid for approval. Demolition using explosives will not be permitted.</p>
<p>Policy PCYFF 3 (Design and Place Shaping) All proposals will be expected to demonstrate high quality design which fully takes into account the natural, historic and built environmental context and contributes to the creation of attractive, sustainable places. Innovative and energy efficient design will be particularly encouraged</p>	<p>The overall scope of the VIP Project is to mitigate the visual impact of existing electrical infrastructure in nationally protected landscapes, therefore the design of the tunnel head house and other related above ground structures have been designed to minimise their visual impact. The tunnel head houses have been sized to accommodate only the required equipment for the operation of the tunnel. Each has been designed in a way to fit in with the environment and surroundings.</p> <p>Chapter 7 explains how ecological impacts will be avoided through careful design including but not limited to:</p> <ul style="list-style-type: none"> • Re-aligning to avoid direct and indirect impacts on locally designated sites; • Sensitive micro-siting of the SECs, tunnel head houses, pylons and underground cables; • Sensitive timing to avoid impacts on important groups such as wintering birds; and • Incorporating appropriate mitigation measures into the design and construction programme to avoid impacts on legally protected species. <p>Where avoidance of impacts is not possible, suitable mitigation will be implemented (see Table 7.3 within Chapter 7).</p>

Policy Summary	Policy Assessment
	<p>Measures to safeguard historic assets during construction will be implemented as part of the general measures in the CEMP, to include avoidance of structures and the use of considerate construction practices including watching briefs.</p>
<p>Policy PCYFF 4 (Design and Landscaping) All proposals should integrate into their surroundings. Proposals that fail to show (in a manner appropriate to the nature, scale and location of the proposed development) how landscaping has been considered from the outset as part of the design proposal will be refused.</p>	<p>The existing infrastructure has previously been identified as having a high level of adverse landscape and visual effects. The permanent removal of approximately 3.5km of 400kV overhead line (VIP Subsection) including 10 pylons and the existing gantry at Garth SEC and subsequent restoration of the landscape will contribute towards beneficial landscape and visual effects.</p> <p>The Proposed Project lies within a typically highly valued area of landscape on the edge of the Snowdonia National Park.</p> <p>Construction activities associated with the Proposed Project would have some short term negative effects on the character of the landscape and visual amenity at a very localised level. However, replacement and additional native tree and scrub planting would enhance and complement the landscape to ensure that construction effects would be mitigated as far as practicably possible in the medium to long term as planting matures.</p> <p>The relatively well contained topography of the landscape to the north of Cilfor would limit the extent of the operational landscape and visual effects of the proposed eastern tunnel head house, SEC and access road and the new replacement/terminal pylon would be viewed as a replacement of an existing pylon.</p> <p>The landscape currently has levels of human influence, the most notable being the existing 400kV overhead line and Garth SEC. The proposed infrastructure to the west and infrastructure to the east of the Dwyryd Estuary would be viewed as smaller, isolated features in the landscape than the VIP Subsection which they would replace.</p>

Policy Summary	Policy Assessment
	<p>The tunnel head houses and SECs have been designed to respond to the sense of place of the local landscape whilst taking into account a number of technical and environmental constraints. The layout of the eastern head house and SEC has reflected the need to minimise impacts on the landscape, hence the co-location of equipment within the same compound. Both tunnel head houses have been architecturally designed to take account of the surrounding distinctive landform and landcover.</p> <p>Over time the replacement and addition of native trees and shrubs around the proposed infrastructure would help assimilate the buildings and associated compounds and access tracks into the landscape and frame and filter views of them. Furthermore, the adverse effects would be balanced against the beneficial effects of removing the VIP Subsection.</p>
<p>Policy PCYFF 5: (Carbon Management) Proposals will need to demonstrate how the energy hierarchy set out in Policy PS 6 has been applied and how the contribution from renewable or low carbon energy to satisfy the proposals need for energy and waste has been maximised.</p>	<p>National Grid are developing an operational model that is in harmony with a low-carbon future by ensuring that low-carbon and renewable energy can be connected to the network, thereby significantly reducing the environmental impact of its day-to-day operations.</p> <p>National Grid plays a dual role in decarbonising the economy. As the Transmission Owner and System Operator, they connect and support the operation and connection of low-carbon energy, and as an infrastructure business, they design, build and manage assets in a sustainable, affordable way while ensuring security of supply.</p> <p>An Energy Statement has been prepared as part of the application and is included within the Design and Access Statement.</p>
<p>Policy PCYFF 6: (Water Conservation) Proposals should incorporate water conservation measures where practicable, including Sustainable Urban Drainage Systems (SUDS). All proposals should implement flood minimisation or mitigation measures where possible, to reduce surface water run-off and minimise its contribution to flood risk elsewhere.</p>	<p>Chapter 9 (Water Resources) considers the potential impacts on surface and groundwater resources, hydromorphology, water quality, flooding and drainage, and Water Framework Directive (WFD) objectives.</p> <p>The CEMP (Section 3.10) states that appropriate industry best practice and published guidelines will be followed to reduce pollution and sediment movement during construction.</p>

Policy Summary	Policy Assessment
	<p>The CEMP acknowledges that it is the Contractors responsibility to ensure compliance with the Groundwater Regulations 1998 and other relevant guidelines for the protection of groundwater.</p> <p>The implementation of the CEMP and embedded mitigation measures are considered sufficient to reduce the main water resources impacts of the Proposed Project during the construction, operational and decommissioning phases to an acceptable level.</p> <p>Additional mitigation measures will be provided to address surface water drainage and water quality considerations for the new access roads to the western and eastern tunnel head house compounds and to manage pumped groundwater discharges to avoid increasing flood risk or morphological damage to the receiving watercourses.</p> <p>The future impacts of climate change such as increased rainfall intensity and rising groundwater levels have been key considerations during the design of the Proposed Project, to ensure that there is no net loss of flood plain storage, and no impediment to flood water flows or surface water run-off.</p> <p>A Sustainable Drainage (SuDS) Strategy (Appendix 9B) has also been prepared for the Proposed Project and demonstrates how it meets the requirements of the Statutory SuDS Standard for Wales. The SuDS Strategy includes a Water Conservation Statement.</p>
<p>Policy PS 19 (Conserving and where appropriate enhancing the natural environment) The Councils will manage development so as to conserve and where appropriate enhance the Plan area's distinctive natural environment, countryside and coastline, and proposals that have a significant adverse effect on them will be refused unless the need for and benefits of the development in that location clearly outweighs the value of the site or area and national policy protection for that site and area in question.</p>	<p>As detailed in Chapter 7 (Ecology) the Proposed Project will result in predicted effects on two statutory sites (Meirionnydd Oakwoods and Bat Sites SAC and Bron Y Garth SSSI) and the species for which they are designated. With mitigation incorporated during and after construction the direct and indirect effects upon these sites has been avoided, reduced or mitigated.</p>

Policy Summary	Policy Assessment
<p><i>Policy provides a list of eight considerations for determining planning applications.</i></p>	<p>An ecological assessment has been undertaken to identify and assess the potential construction, operational and decommissioning effects resulting from the Proposed Project on ecological features (designated sites, species and habitats). The assessment has identified all valued ecological features and the effects of the Project, and in turn has outlined appropriate mitigation and compensation measures to avoid, reduce or offset any effects. Where opportunities exist, measures to provide beneficial effects have been outlined.</p> <p>During construction, the proposed access routes, works compounds and construction zones will have potential effects on the following protected species: Badgers, bats, reptiles and breeding birds and Toads. The effects have been based on the details of the Proposed Project, mitigation measures (where appropriate), appropriate timing of works, re-instatement of important habitats, landscape planting and limited night working and appropriate lighting designs.</p> <p>Following the incorporation of mitigation and compensation measures, including prompt reinstatement, it has been possible avoid, reduce or offset any effects as far as practically possible.</p>
<p>Policy AMG 2 (Special Landscape Areas) When considering a proposal within Special Landscape Areas (SLA), there will be a need to appropriate consideration to the scale and nature of the development ensuring that there is no significant adverse detrimental impact on the landscape. The development should aim to maintain, enhance or restore the recognised character and qualities of the SLA.</p>	<p>Chapter 6 (LVIA) describes two SLAs within the Study Area, 02. Porthmadog & Tremadog Bay SLA and 03. Glaslyn & Dwryd Estuary Landscapes SLA.</p> <p>The removal of four pylons and the redundant foundations of another former pylon from within Glaslyn and Dwryd Estuary SLA would have direct operational effects on the SLA while the removal of other pylons outside the SLA would result in indirect effects which would be positive and long term in duration. The overall effect of the Proposed Project would be highly beneficial in terms of reducing the impact on the key characteristics of this SLA.</p> <p>The removal of the VIP Subsection would also indirectly benefit Porthmadog & Tremadog Bay SLA through enhancing ‘the long, sweeping views across the Afon Glaslyn estuary, Traeth Bach, the coast and the mountains of Snowdonia’. These effects would be positive and long term in duration.</p>

Policy Summary	Policy Assessment
<p>Policy AMG 3 (Protecting and Enhancing Features and Qualities that are Distinctive to the Local Landscape Character) Proposals that would have significant adverse impact upon landscape character as defined by the Landscape Character Areas included within the current Landscape Strategy for the relevant authority, must demonstrate through a landscape assessment how landscape character has influenced the design, scale, nature and site selection of the development.</p>	<p>The Proposed Project would result in substantial improvement to landscape character and visual amenity of the western edge of Snowdonia National Park and its highly valued coastal fringe setting characterised by the Glaslyn and Dwyryd Estuaries and the distinctive Minfordd Peninsula which separates them.</p> <p>See Chapter 6 (LVIA) and response to Policy PCYFF 4 for more.</p>
<p>Policy AMG 5 (Local Biodiversity Conservation) Proposals must protect and, where appropriate, enhance biodiversity that has been identified as being important to the local area by:</p> <ol style="list-style-type: none"> a) Avoiding significant harmful impacts through the sensitive location of development. b) Considering opportunities to create, improve and manage wildlife habitats and natural landscape. 	<p>See response to Policy PS 19 of the Anglesey and Gwynedd Joint Local Development Plan.</p>
<p>Policy AMG 6 (Protecting Sites of Regional or Local Significance) 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 local geological importance.</p>	<p>One non-statutory designated site (Bron Y Garth Hospital Wildlife Site) has been identified partly within the Site Boundary and Traeth Glaslyn North Wales Wildlife Trust site is immediately adjacent to the Site Boundary. Bron Y Garth Wildlife Site is within the boundary of Bron Y Garth SSSI, and Traeth Glaslyn North Wales Wildlife Trust site is within the boundary of Glaslyn SSSI. These non-designated sites are therefore considered under the SSSI features. Mitigation to address potential impacts on these sites will include the implementation of a CEMP to include measures to minimise dust, noise, littering, environmental incidents and lighting.</p>
<p>Policy PS 20 (Preserving and where appropriate enhancing heritage assets) In seeking to support the wider economic and social needs of the Plan area, the Local Planning Authorities will preserve and where appropriate, enhance its unique heritage assets.</p>	<p>Chapter 8 (Archaeology and Cultural Heritage) considers the potential effects of the Proposed Project on onshore archaeology and cultural heritage during the construction phase (including overhead line removal), and operation and decommissioning phases.</p>

Policy Summary	Policy Assessment
<p>Policy AT 1 (Conservation Areas, World Heritage Sites and Registered Historic Landscapes, Parks and Gardens) Proposals within or affecting the setting and/ or significant views into and out of Conservation Areas, World Heritage Sites and Registered Historic Landscapes, Parks and Gardens shown on the Constraints Map must, where appropriate, have regard to:</p> <ol style="list-style-type: none"> 1. Adopted Conservation Area Character Appraisals, Conservation Area Plans and Delivery Strategies. 2. World Heritage Site Management Plans. 3. The Register of Landscape, Parks and Gardens of Special Historic Interest in Wales. 	<p>During construction there is the potential for direct impacts upon below-ground remains. Within the western compound and cable route a watching brief will be undertaken. Within the eastern compound a programme of archaeological work will be undertaken, commencing with investigation of the palaeo-environmental significance of the peat deposit in advance of construction. This initial phase will inform the subsequent mitigation response to construction groundworks and may include a watching brief during construction in order to observe the groundworks and record any deposits of significance that are exposed.</p> <p>Where archaeological remains are identified the creation of a permanent record, including public dissemination of the results prior to their removal, would offset the development impact and result in no residual effect.</p>
<p>Policy AT 3 (Locally or Regionally Significant Non-Designated Heritage Assets). Councils will support proposal to conserve and seek opportunities to enhance buildings, structures and areas of locally or regionally significant non-designated heritage assets, which create a sense of local character, identity and variation across the Plan area</p>	<p>In terms of indirect impacts, general measures have been identified in the CEMP (Section 3.12) and includes the avoidance of structures and the use of considerate construction practices.</p>
<p>Policy AT 4 (Protection of non-Designated Archaeological sites and their setting). Proposals which may have a significant adverse impact on sites that are of potential national archaeological importance and their setting, or are of acknowledged local heritage importance, including sites of industrial archaeology that are not scheduled and their settings will:</p> <ul style="list-style-type: none"> • Be assessed in terms of the intrinsic importance of the 'site' and the potential extent of harm. 	

Policy Summary	Policy Assessment
<ul style="list-style-type: none"> Require, where appropriate, either an archaeological assessments and/ or field evaluation by an archaeological body or a professionally qualified archaeologist in order to determine the archaeological impact of the proposed development before the Planning Authority determines the application. 	

Table 5.2: Relevant policies from Snowdonia National Park Authority - Eryri Local Development Plan (2007 - 2022)

Policy Summary	Policy Assessment
<p>Strategic Policy A (National Park Purposes and Sustainable Development) The Local Development Plan seeks to ensure that new development promotes the principles of sustainable development in ways which further National Park purposes and duty whilst conserving and enhancing the National Park's 'Special Qualities'. Proposals which compromise National Park purposes will be refused.</p>	<p>See response to Policy PS 5 of the Anglesey and Gwynedd Joint Local Development Plan.</p>
<p>Strategic Policy B (Major Development B) Major development will not be permitted within the National Park other than in exceptional circumstances where there is demonstrated to be an overriding public need. Proposals for major development will be subject to the most rigorous examination and include an assessment of all the following:</p> <ol style="list-style-type: none"> i. the need for the development in terms of national considerations. ii. the cost of and scope for siting the development outside the National Park or the ability to meet the need for the development in some other way. iii. the consequences and impact on local communities, the local economy, the environment and the cultural heritage of the National Park of permitting or refusing the development. iv. the impact the development would have on National Park purposes and the extent that these could be moderated through appropriate and acceptable mitigation measures. 	<p>Chapter 1 (Introduction) describes how the Proposed Project represents a major opportunity to mitigate the visual impact of existing electricity infrastructure at Snowdonia National Park near Minffordd and to conserve and enhance the natural beauty, wildlife and environmental heritage of the area. The overhead line in this area is judged to have:</p> <ul style="list-style-type: none"> • Landscape impacts of very high level of importance on the Arduwy Coastal Hinterland and a part of Morfa Harlech landscape. • High level visual impacts with people using the Wales Coast Path regional trail, National Cycle Route 8, local rights of way and Open Access Land, due to close up and frequent views of the pylon overhead.

Policy Summary	Policy Assessment
Where the Authority consider that the overall outcome of this assessment will result in an adverse and unacceptable impact on the National Park, permission for such major development will be refused.	
Development Policy 1 (General Development Principals) To conserve and enhance the 'Special Qualities' and purposes of the National Park, development will only be permitted where regards has been shown to the general development principles outlined within the plan.	The Proposed Project represents a major opportunity to mitigate the visual impact of existing electricity infrastructure within and adjacent to Snowdonia National Park and to conserve and enhance the natural beauty, wildlife and environmental heritage of the area. The Proposed Project would result in substantial improvement to landscape character and visual amenity of the western edge of Snowdonia National Park and its highly valued coastal fringe setting characterised by the Glaslyn and Dwyryd Estuaries and the distinctive Minfordd Peninsula which separates them.
Strategic Policy D (Natural Environment) The natural resources, biodiversity, geodiversity and 'Special Qualities' of the Snowdonia National Park will be protected from inappropriate development. Where development is deemed acceptable developers will be expected to ensure that the natural environment is protected and enhanced.	See response to Policy PS 19 of the Anglesey and Gwynedd Joint Local Development Plan.
Development Policy 2 (Development and the Landscape) The scale and design of new development, including its setting and landscaping should respect and conserve the character of the landscape. Unacceptable impacts on the landscape will be resisted.	See response to Policies PCYFF 4, AMG 2 and AMG 3 of the Anglesey and Gwynedd Joint Local Development Plan.
Strategic Policy Dd (Climate Change) The contribution that emissions of greenhouse gases from the National Park make to climate change will be reduced and the impacts of climate change on the National Park will be addressed in this Plan by:	See response to Policy PCYFF 6 and PS 6 of the Anglesey and Gwynedd Joint Local Development Plan. In terms of conserving and enhancing peatland areas, the Outline CEMP contains an Outline Peat Management Plan. This provides guidance on how any peat removed during the construction phase could be relocated in order to help preserve the overall moisture content of the peat deposits (for example, by relocating peat into local drainage ditches within the peat layers in order to help retain water). In addition, the SuDS Strategy (Appendix 9B) also contains measures that will help to retain the water content of the existing peat deposits. These combined measures

Policy Summary	Policy Assessment
<ul style="list-style-type: none"> • Ensuring that any coastal and flood protection works, including managed realignment, considered to be necessary have no adverse environmental impacts or that they can be satisfactorily mitigated. • Conserving and enhancing areas of woodland, upland soils and peatland areas to assist in carbon retention, water storage and flood prevention. • Facilitating species adaptation and migration through protecting habitat connectivity corridors and enhancing biodiversity. • Directing development to locations which reduces the need to travel, especially by private car. 	<p>will help to ensure that the peat deposits are able to quickly recover from any temporary impacts of near-surface ground water pumping.</p>
<p>Strategic Policy Ff (Historic Environment) The historic landscape, heritage assets and cultural heritage of Snowdonia National Park will be conserved and enhanced, due to their contribution to the character and 'Special Qualities' of the National Park. Particular protection will be given to the following archaeological, architectural, historic or cultural assets and where appropriate, their settings.</p>	<p>See response to Policies PCYFF 3 and AT 1 of the Anglesey and Gwynedd Joint Local Development Plan.</p>
<p>Development Policy 6 (Sustainable Design and Materials) In order to promote sustainable development within the National Park all forms of new built development will attain at least the national sustainable building requirements. With regard to National Park setting and the Authority's commitment to social inclusion, development proposals will be required to take into consideration the following:</p> <ul style="list-style-type: none"> • Inclusive design • Landscape protection and enhancement • Biodiversity protection and enhancement 	<p>See response to Policies PCYFF 3 and PCYFF 4 of the Anglesey and Gwynedd Joint Local Development Plan.</p>

Policy Summary	Policy Assessment
<ul style="list-style-type: none"> • The historic environment • Environmental sustainability • Cultural identity • An Integrated energy statement 	
<p>Development Policy 8 (Protection of Non-Designated Sites) Development which may adversely affect sites that are of archaeological interest or are acknowledged of local heritage importance including sites of industrial archaeology that are not scheduled will:</p> <ol style="list-style-type: none"> i. Be judged in terms of the intrinsic importance of the heritage asset and the potential extent of harm. ii. Require where appropriate archaeological assessments and field evaluations before applications are determined. <p>Where proposals are acceptable but may have an adverse effect on a site a condition will be attached to the permission stating that no development should take place until an agreed programme of archaeological work has taken place.</p>	<p>See response to Policies AMG 6, PS 20, AT 3 and AT 4 of the Anglesey and Gwynedd Joint Local Development Plan.</p>
<p>Development Policy 18 (The Welsh Language and the Social and Cultural Fabric of Communities) The National Park Authority requires proposals to take into account the needs and interests of the Welsh language.</p>	<p>See response to Policy PS 1 of the Anglesey and Gwynedd Joint Local Development Plan.</p>

5.4 Marine Planning Policy

5.4.1 The Marine and Coastal Access Act (2009) gives Ministers powers to plan for UK waters, for the purpose of contributing to the sustainable development of the marine area.

5.4.2 The UK Marine Policy Statement (MPS) has been in place since 2011 and sets out the policies which should be followed when making planning decisions in the marine environment. The MPS will facilitate and support the formulation of marine plans, ensuring that marine resources are used in a sustainable way in line with the high level marine objectives and thereby:

- Promote sustainable economic development;
- Enable the UK's move towards a low-carbon economy, in order to mitigate the causes of climate change and ocean acidification and adapt to their effects;
- Ensure a sustainable marine environment which promotes healthy, functioning marine ecosystems and protects marine habitats, species and our heritage assets; and
- Contribute to the societal benefits of the marine area, including the sustainable use of marine resources to address local social and economic issues.

5.4.3 The first Welsh National Marine Plan (WNMP) was published in November 2019. The WNMP provides an integrated framework for decision-making about the future use of Welsh seas. It will influence the approach to the management of all activities that take place in the marine environment and will form the basis for all decisions on licensable marine activities that are made by Public Authorities, including Natural Resources Wales. It sets out 13 objectives supporting the UK High Level Marine Objectives (HLMO) and the Marine Policy Statement (MPS):

- Support the sustainable development of the Welsh marine area by contributing across Wales' well-being goals, ensuring the Sustainable Management of Natural Resources (SMNR) through decision making and by taking account of the cumulative effects of all uses of the marine environment.
- Contribute to a thriving Welsh economy by encouraging economically productive activities and profitable and sustainable businesses that create long term employment at all skill levels.
- Support the opportunity to sustainably develop marine renewable energy resources with the right development in the right place, helping to achieve the UK's energy security and carbon reduction objectives, whilst fully considering other's interests, and ecosystem resilience.
- Provide space to support existing and future economic activity through managing multiple uses, encouraging the coexistence of compatible activities, the mitigation of conflicts between users and, where possible, by reducing the displacement of existing activities.
- Recognise the significant value of coastal tourism and recreation to the Welsh economy and well-being and ensure such activity and potential for future growth are appropriately safeguarded.
- Contribute to supporting the development of vibrant, more equitable, culturally and linguistically distinct, cohesive and resilient coastal communities.
- Support enjoyment and stewardship of our coast and seas and their resources by encouraging equitable and safe access to a resilient marine environment, whilst protecting and promoting valuable landscapes, seascapes and heritage assets.

- Improve understanding and enable action supporting climate change adaptation and mitigation.
- Support the achievement and maintenance of Good Environmental Status (GES) and Good Ecological Status (GES).
- Protect, conserve, restore and enhance marine biodiversity to halt and reverse its decline including supporting the development and functioning of a well-managed and ecologically coherent network of Marine Protected Areas (MPAs) and resilient populations of representative, rare and vulnerable species.
- Maintain and enhance the resilience of marine ecosystems and the benefits they provide in order to meet the needs of present and future generations.
- Support proportionate, consistent and integrated decision making through implementing forward-looking policies as part of a plan-led, precautionary, risk-based and adaptive approach to managing Welsh seas.
- Develop a shared, accessible marine evidence base to support use of sound evidence and provide a mechanism for the unique characteristics and opportunities of the Welsh Marine Area to be better understood.

Policy Assessment

5.4.4 The extent to which the Proposed Project complies with relevant policies of the WNMP is outlined within Table 5.3 below.

Table 5.3: Relevant General Cross-Cutting Policies from WNMP

Policy Summary	Policy Assessment
Policy GEN_01 (Overarching planning policy). There is a presumption in favour of the sustainable development of the plan area in order to contribute to Wales' well-being goals.	See response to Policy PS 5 of the Anglesey and Gwynedd Joint Local Development Plan.
Policy GEN_02 (Overarching planning policy). Relevant public authorities should take a proportionate, risk-based approach to application of relevant marine planning policies in decision making.	
Policy ECON_02 (Coexistence). Proposals should demonstrate how they have considered opportunities for coexistence with other compatible sectors in order to optimise the value and use of the marine area and marine natural resources.	<p>Chapter 13 (Socio-Economics and Tourism) considers tourism and recreation and assesses the impacts of the Proposed Project on tourist attractions, tourism hubs, tourism sector; and recreation including PRoW, cycle routes, LDWR, open access land and nature reserves, and marine-related leisure activities. The assessment has concluded that effects will be minimal during both construction and operation.</p> <p>Chapter 15 (Marine Physical Processes) considers the potential adverse and beneficial effects of the Proposed Marine Works on the marine physical environment and marine processes.</p> <p>Partial removal of the pylon foundations within the main estuary channel will enable the scour holes to infill naturally and unlock the natural behaviour of channel migration at this location.</p> <p>If full removal of the foundations and cofferdam on the edge of the saltmarsh is achieved it is predicted the scour holes will infill and the ability of the channel to freely migrate in an unconstrained manner at this location will return.</p> <p>It is concluded that the Proposed Marine Works will result in low to high beneficial effects in helping to restore the estuary to its natural status at this location.</p>

Policy Summary	Policy Assessment
	Due to its location within the estuary, the Proposed Project will not have any effect on the defence, dredging and disposal, energy (low carbon, oil and gas), fisheries, ports and shipping, subsea cabling, surface water and wastewater treatment and disposal.
Policy SOC_01 (Access to the marine environment). Proposals that maintain or enhance access to the marine environment are encouraged.	See response to Policies ECON_01 and ECON_02 of the WNMP.
Policy SOC_02 (Well-being of coastal communities). Proposals that contribute to the well-being of coastal communities are encouraged.	See response to Policy ECON_01 of the WNMP. Chapter 13 (Socio-Economics and Tourism) assesses the community amenity effects arising from a combination of visual, traffic and noise effects. There are expected to be minimal amenity effects on the two communities within the study area (Penrhyndeudraeth and Minffordd).
Policy SOC_03 (Marine pollution incidents). Proposals should demonstrate how they minimise their risk of causing or contributing to marine pollution incidents.	Chapter 15 (Marine Physical Processes) scopes out the following pollution and other chemical change pressures on the marine physical environment: <ul style="list-style-type: none"> • Transition elements & organo-metal contamination • Deoxygenation
Policy SOC_04 (Welsh language and culture). Proposals that contribute to the promotion and facilitation of the use of the Welsh language and culture are encouraged.	See response to Policy PS 1 of the Anglesey and Gwynedd Joint Local Development Plan.
Policy SOC_05 (Historic assets). Proposals should demonstrate how potential impacts on historic assets and their settings have been taken into consideration and should, in order of preference: <ol style="list-style-type: none"> a. avoid adverse impacts on historic assets and their settings; and/or b. minimise impacts where they cannot be avoided; and/or c. mitigate impacts where they cannot be minimised. <p>If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding.</p>	See response to Policies PS 20, AT 3 and AT 4 of the Anglesey and Gwynedd Joint Local Development Plan and Development Policy 8 of the Snowdonia National Park Authority - Eryri Local Development Plan. Chapter 17 (Marine Archaeology) considers the likely effects of the Proposed Marine Works in term of marine archaeology. No recorded historic assets are present within the footprint of the Proposed Marine Works, with the only identified asset of marine archaeological interest within the Marine Environment Area comprising the wreck of an amphibious vehicle located to the south of the OHL.

Policy Summary	Policy Assessment
<p>Opportunities to enhance historic assets are encouraged.</p>	<p>There is some potential that as yet unidentified buried archaeological remains may be encountered during the removal of the pylon foundations, within areas of adjacent ground which were not subject to disturbance during the pylon installation.</p> <p>The assessment identified negligible to minor adverse effects upon the marine archaeological resource with the effects upon potential archaeological remains to be addressed through the implementation of a Protocol for Archaeological Discoveries (PAD) during the construction phase. In addition, an Archaeological Exclusion Zone is proposed to mitigate any potential effects upon the recorded amphibious vehicle wreck.</p>
<p>Policy SOC_06 (Designated landscapes). Proposals should demonstrate how potential impacts on the purposes and special qualities for which National Parks or Areas of Outstanding Natural Beauty have been designated have been taken into consideration and should, in order of preference:</p> <ol style="list-style-type: none"> a. avoid adverse impacts on designated landscapes; and/or b. minimise impacts where they cannot be avoided; and/or c. mitigate impacts where they cannot be minimised. <p>If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding.</p> <p>Opportunities to enhance designated landscapes are encouraged.</p>	<p>See response to Policies PCYFF 4, AMG 2 and AMG 3 of the Anglesey and Gwynedd Joint Local Development Plan and Development Policy 1 of the Snowdonia National Park Authority - Eryri Local Development Plan.</p>
<p>Policy SOC_07 (Seascapes Proposals). Proposals should demonstrate how potential impacts on seascapes have been taken into consideration and should, in order of preference:</p> <ol style="list-style-type: none"> a. avoid adverse impacts on seascapes; and/or b. minimise impacts where they cannot be avoided; and/or c. mitigate impacts where they cannot be minimised. 	<p>The Proposed Project was subject to a detailed scoping exercise, in order to focus environmental reporting on the key environmental issues likely to be encountered. The scoping exercise involved a review of available documentation related to the existing environment; consultation with statutory and non-statutory bodies with knowledge of the local area; preliminary desk-based and site-based appraisals and surveys; and knowledge of potential environmental impacts.</p>

Policy Summary	Policy Assessment
<p>If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding.</p> <p>Opportunities to enhance seascapes are encouraged.</p>	<p>Consideration of National Marine Character Areas (MCAs) and Local Seascape Character Areas (SCAs) has been excluded from the landscape assessment as the landward parts of these areas overlap with the LCAs which have been considered as landscape receptors in the assessment.</p>
<p>Policy SOC_08 (Resilience to coastal change and flooding). Proposals should demonstrate how they are resilient to coastal change and flooding over their lifetime.</p> <p>Policy SOC_09 (Effects on coastal change and flooding). Proposals should demonstrate how they:</p> <ul style="list-style-type: none"> a) avoid significant adverse impacts upon coastal processes; and b) minimise the risk of coastal change and flooding; <p>Proposals that align with the relevant Shoreline Management Plan(s) and its policies are encouraged.</p>	<p>Chapter 9 (Water Resources) appraises the potential impacts of the Proposed Project on water resources including flooding and drainage. The implementation of the CEMP and embedded mitigation measures are considered sufficient to reduce the main water resources impacts of the Proposed Project during the construction, operational and decommissioning phases to an acceptable level. Additional mitigation measures will be provided to address surface water drainage and water quality considerations for the new access roads to the western and eastern tunnel head house compounds and to manage pumped groundwater discharges to avoid increasing flood risk or morphological damage to the receiving watercourses.</p> <p>The Proposed Project will see the removal of existing infrastructure within the marine environment. The presence of these structures has resulted in there being small-scale artificial barriers to the natural functioning of the estuary and some local scouring in the estuary around the remnants of foundation structures. Construction of the temporary platform to reach the remnants of foundation structures may have a short term effect however once the platform is removed the estuary will quickly recover.</p> <p>Long term effects of partial and full infrastructure removal would be greatly beneficial, restoring the natural behaviour of channel migration for this part of the estuary.</p>
<p>Policy SOC_10 (Minimising climate change). Proposals should demonstrate how they, in order of preference:</p> <ul style="list-style-type: none"> a) avoid the emission of greenhouse gases; and/or b) minimise them where they cannot be avoided; and/or c) mitigate them where they cannot be minimised. 	<p>See response to Strategic Policy Dd (Climate Change) of the Snowdonia National Park Authority - Eryri Local Development Plan and Policies PCYFF 6 and PS 6 of the Anglesey and Gwynedd Joint Local Development Plan.</p>

Policy Summary	Policy Assessment
<p>Where significant emission of greenhouse gases cannot be avoided, minimised or mitigated, proposals for regulated activities must present a clear and convincing justification for proceeding.</p>	
<p>Policy SOC_11 (Resilience to climate change). Proposals should demonstrate that they have considered the impacts of climate change and have incorporated appropriate adaption measures, taking into account Climate Change Risk Assessments for Wales.</p>	
<p>Policy ENV_01 (Resilient marine ecosystems). Proposals should demonstrate how potential impacts on marine ecosystems have been taken into consideration and should, in order of preference:</p> <ul style="list-style-type: none"> a) avoid adverse impacts; and/ or b) minimise impacts where they cannot be avoided; and/ or c) mitigate impacts where they cannot be minimised. <p>If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding.</p> <p>Proposals that contribute to the protection, restoration and/ or enhancement of marine ecosystems are encouraged.</p>	
<p>Policy ENV_02 (Marine Protected Areas). Proposals should demonstrate how they:</p> <ul style="list-style-type: none"> • avoid adverse impacts on individual Marine Protected Areas (MPAs) and the coherence of the network as a whole; • have regard to the measures to manage MPAs; and 	<p>Chapter 17 (Marine Ecology) considers the potential adverse and beneficial effects of the Proposed Marine Works on marine ecology, focusing on the qualifying features of European and national protected sites and has been informed by and summarises the conclusions drawn by the VIP Snowdonia Marine Habitat Regulations Assessment (HRA) (Appendix 16A).</p> <p>It concludes that there is a potential pressure-receptor pathway between the Proposed Marine Works and the qualifying feature Atlantic salt meadows / saltmarsh of the Pen Llyn a 'r Sarnau / Llyn Peninsula and the Sarnau SAC and Morfa Harlech SSSI.</p> <p>Mitigation measures to be implemented as part of the Proposed Project include:</p> <ul style="list-style-type: none"> • restoring the Atlantic salt meadow / saltmarsh at Site 4ZC031; • surveying access routes to identify rare plant species; and • employing an Ecological Clerk of Works to ensure rare plants are not disturbed.

Policy Summary	Policy Assessment
<ul style="list-style-type: none"> avoid adverse impacts on designated sites that are not part of the MPA network. 	
<p>Policy ENV_03 (Invasive non-native species). Proposals should demonstrate how they avoid or minimise the risk of introducing and spreading invasive non-native species.</p> <p>Where appropriate, proposals should include biosecurity measures to reduce the risk of introducing and spreading of invasive non-native species.</p>	See response to Policy PCYFF 2 of the Anglesey and Gwynedd Joint Local Development Plan.
<p>Policy ENV_04 (Marine litter). Proposals should demonstrate how they:</p> <ul style="list-style-type: none"> avoid the deliberate introduction of litter into the marine plan area; and minimise the risk of accidental release of litter. 	As detailed in the CEMP, appropriate measures, such as use of enclosed containers, will be employed to store waste susceptible to spreading by wind or liable to cause litter.
<p>Policy ENV_05 (Underwater noise). Proposals should demonstrate that they have considered man-made noise impacts on the marine environment and, in order of preference:</p> <ol style="list-style-type: none"> avoid adverse impacts; and/or minimise impacts where they cannot be avoided; and/or mitigate impacts where they cannot be minimised. <p>If significant adverse impacts cannot be avoided minimised or mitigated, proposals must present a clear and convincing case for proceeding.</p>	National Grid sought advice from Marine Licensing and consequently commissioned ABPMer to undertake an underwater noise and vibration assessment to inform the EA. A noise and vibration assessment on the potential effects of the Proposed Marine Works (ABPMer 2019) and the construction of the cable tunnel under the estuary concluded any effects on fish would be negligible to minor (see Appendix 16A).
<p>Policy ENV_06 (Air and water quality). Proposals should demonstrate that they have considered their potential air and water quality impacts and should, in order of preference:</p> <ol style="list-style-type: none"> avoid adverse impacts; and/or minimise adverse impacts where they cannot be avoided; and/or mitigate adverse impacts where they cannot be minimised. 	See response to Policy PCYFF 2 of the Anglesey and Gwynedd Joint Local Development Plan.

Policy Summary	Policy Assessment
<p>If significant adverse impacts cannot be adequately avoided, minimised or mitigated, proposals should present a clear and convincing case for proceeding.</p>	
<p>Policy ENV_07 (Fish Species and Habitats). Proposals potentially affecting important feeding, breeding (including spawning & nursery) and migration areas or habitats for key fish and shellfish species of commercial or ecological importance should demonstrate how they, in order of preference:</p> <ol style="list-style-type: none"> a) avoid adverse impacts on those areas; and/ or b) minimise adverse impacts where they cannot be avoided; and/ or c) mitigate adverse impacts where they cannot be minimised. <p>If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding.</p>	<p>Chapter 16 (Marine Ecology) scopes out the pressure on changes in suspended solids (water clarity) and states that a small, localised and temporary increase in turbidity is expected which has the potential to briefly reduce the feeding capability of fish species relying on sight to locate their prey. However, brief increases in turbidity will not be noticeable against background levels of disturbance experienced during periods when the estuary sandflats are mobilised.</p> <p>Excavation works to a pylon (4ZC031) will cause direct loss of habitat within the footprint of the works. Given the size and depth of excavation holes it is uncertain if Atlantic salt meadow / saltmarsh will regenerate within the depressions. For this reason, mitigation measures will be implemented to restore the habitat in the short-term; ensuring that there is no loss of range of the habitat.</p>
<p>Policy GOV_01 (Cumulative effects). Proposals should demonstrate that they have assessed potential cumulative effects and should, in order of preference:</p> <ol style="list-style-type: none"> a) avoid adverse effects; and/or b) minimise effects where they cannot be avoided; and/or c) mitigate effects where they cannot be minimised. <p>If significant adverse effects cannot be adequately addressed, proposals should present a clear and convincing justification for proceeding.</p> <p>Proposals that contribute to positive cumulative effects are encouraged.</p>	<p>Gwynedd Council and Snowdonia National Park Authority have confirmed that there are no cumulative developments to be assessed with Proposed Project.</p> <p>A search of applications on the NRW marine licensing portal for plans and projects within 10km of the Proposed Marine Works was undertaken in November 2019 however, no plans and projects within this area were found. Given the Proposed Marine Works are planned for 2025 it is unlikely that information on any projects which could overlap spatially and temporarily with the Proposed Marine Works will be in the public domain yet. Should any future projects have the potential to overlap cumulatively with the Proposed Marine Works, they would need to consider the Snowdonia VIP project in their cumulative effect assessment.</p> <p>Chapter 18 (Cumulative) considers interaction of impacts from individual environmental topic areas on given receptors or resources associated with the Proposed Project (intra-project effects).</p>

Policy Summary	Policy Assessment
<p>T&R_01 (Tourism and recreation supporting). T&R_01 a:</p> <p>Proposals that demonstrate a positive contribution to tourism and recreation opportunities and policy objectives (for the sector) around the Welsh coast will be supported where they contribute to the objectives of this plan. Proposals should comply with the relevant general policies and sector safeguarding policies of this plan and any other relevant considerations.</p> <p>T&R_01 b: Relevant public authorities and the sector are encouraged, in liaison with other interested parties, to collaborate to understand opportunities for sustainable tourism and recreation around the Welsh coast, including:</p> <ul style="list-style-type: none"> a) developing a strategic evidence base to improve understanding of current and potential tourism and recreation activities, including eco-tourism and other low impact activities; and b) Opportunities to define areas of future opportunity for tourism and recreation in order to support the sustainable development of the tourism and recreation sector through marine planning. 	<p>See response to Policies ECON_01 and ECON_02 of the WNMP.</p>

5.5 Conclusion

- 5.5.1 The Proposed Project and associated planning application, forms part of National Grid's Visual Impact Provision (VIP) project which represents a major opportunity to conserve and enhance the natural beauty, wildlife and environmental heritage within Great Britain's most protected landscapes. The VIP project will make use of a £500m allocation by Ofgem to carry out work to help reduce the impact existing transmission lines in English and Welsh Areas of Outstanding Natural Beauty (AONBs) and National Parks.
- 5.5.2 The Proposed Project has been designed by applying a stakeholder led approach. Meetings have been ongoing with the local Stakeholder Reference Group since 2015, including representatives from Gwynedd Council, Snowdonia National Park Authority and Natural Resources Wales. The Proposed Project has been developed from a number of options, taking into account engineering, land and environmental constraints identified from baseline studies, site walkovers and discussions with landowners and stakeholders.
- 5.5.3 Although the Proposed Project does not constitute formal EIA development, this Environmental Appraisal demonstrates how National Grid intends to meet its environmental responsibilities and mitigate any environmental effects, covering all elements of the Proposed Project.
- 5.5.4 The main overriding considerations of the Proposed Project are its significant environmental benefits from the conservation and enhancement of landscape and visual features that will be provided to the surrounding area.
- 5.5.5 The Proposed Project is in accordance with the provisions of Welsh Government guidance as well as those policies of relevance within the Development Plans and this chapter demonstrates how the Proposed Project provides overriding benefits to the surrounding area. Consequently, it is considered that it has been fully justified and that there are no sound planning considerations why permission should not be granted for those elements of the project requiring planning permission.