# 3 ENVIRONMENTAL APPRAISAL PROCESS

## 3.1 Screening

3.1.1 The Proposed Project does not fall within any of the categories of development outlined in Schedule 1 of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (as amended) which requires the preparation of a mandatory Environmental Impact Assessment (EIA) written in the format of a statutory Environmental Statement (ES). Similarly, the Proposed Project does not obviously fall within any of the categories of development outlined in Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (as amended) which *may* require a statutory ES. However, planning practice guidance[1] states that in determining whether a particular proposal for development is included within one of the categories of development listed in Schedule 1 or Schedule 2 of the 2017 Regulations, local planning authorities and developers should have regard to the ruling of the Court of Justice of the European Union that the Directive has a "wide scope and broad purpose" (In the Court of Justice of the European Union case (Kraaijeveld v Holland)).

3.1.2 If a Proposed Project is listed in Schedule 2 or if the local planning authority/ developer considers it falls within Schedule 2 by applying the above 'wide scope and broad purpose', the local planning authority should consider whether it is likely to have significant effects on the environment. Projects listed in Schedule 2 which are located in, or partly in, a sensitive area (including a National Park) need to be screened for the requirement of a statutory EIA, even if they are below the thresholds or do not meet the criteria listed in Schedule 2.

3.1.3 National Grid made a formal request for a Screening Opinion to Gwynedd Council (acting at that time as Lead Authority on behalf of the Snowdonia National Park Authority) under The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (as amended) and to Natural Resources Wales under the Marine Works (Environmental Impact Assessment) (Amendment) Regulations 2017 in October 2018 to determine whether the Proposed Project is likely to have significant effects on the environment and the need for a statutory EIA. This request was supported by the submission of a joint Screening and Scoping Report.

3.1.4 Gwynedd Council, Snowdonia National Park Authority and Natural Resources Wales responded to the request for a Screening Opinion 15 February 2019, 19 December 2018 and 18 January 2019 respectively, concluding that formal statutory EIA would not be required as the Proposed Project is unlikely to have a significant adverse effect on the environment (See Appendix 3A).

3.1.5 Following this, National Grid moved into the design phase of project planning and worked with their appointed environmental specialist and project engineers to refine the Proposed Project to embed environmental mitigation into the design, whilst also fulfilling their electricity supply requirements. This refinement of the Proposed Project led to a number of changes to the Proposed Project described in the Screening and Scoping Report submitted in October 2018. The changes made aimed to further reduce the potential for environmental effects. However, given the changes to the Proposed Project, it was agreed with Snowdonia National Park Authority and Gwynedd Council that the Proposed Project would be re-screened. National Grid made this further request for a screening opinion to Snowdonia National Park Authority (acting as Lead Authority on

[1] https://www.gov.uk/guidance/environmental-impact-assessment#proposed-development

behalf of Gwynedd Council) on 19 August 2019 under The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (as amended). The role of Lead Authority changed as the refined Proposed Project had a larger footprint (at that time) which required planning permission within Snowdonia National Park Authority than Gwynedd Council.

3.1.6 Snowdonia Park Authority responded to the additional screening request on 9 November 2019, concluding again that formal EIA would *not* be required given the scale and nature of the Proposed Project.

## 3.2 Scoping

3.2.1 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.

3.2.2 A joint Screening and Scoping Report was prepared and accompanied the initial formal request for a screening opinion which was issued by National Grid to Gwynedd Council and Natural Resources Wales on 26 October 2018. Gwynedd Council engaged interested parties as part of the scoping process.

3.2.3 As part of the scoping exercise, environmental aspects were reviewed, and a number of aspects were scoped out of any environmental reporting based on the limited potential for environmental effects to arise. Aspects scoped out of environmental reporting (as listed in the Scoping Report, October 2018) are presented in Table 3.1.

**Table 3.1: Aspects Scoped Out of Environmental Reporting**

| Aspects Scoped Out of Environmental Reporting (Scoping Report, 2018) |
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| **Landscape and Visual Impact Assessment** |
| Potential effects on any landscape or visual receptors that are located outside the LVIA study area (unless they are particularly sensitive receptors, which have been highlighted either through the ZTVs or through discussion with stakeholders and interested parties). Local Character Areas (LCA) which are principally located outside of the study area will be scoped out of the assessment.<br>Potential effects on landscape or visual receptors that are located wholly outside the ZTV.<br>Potential effects on residential receptors outside of public spaces.<br>Residential amenity assessment.<br>The following receptors will not be assessed:<br>• Landscape elements (i.e. tree cover, field boundaries, landform, water courses);<br>• National Landscape Character Areas (NLCAs);<br>• National Marine Character Areas (MCA);<br>• Local Seascape Character Areas (SCA);<br>• LANDMAP Visual and Sensory Aspect Areas (VSAA); and<br>• Registered Parks and Gardens. |

| Aspects Scoped Out of Environmental Reporting (Scoping Report, 2018) |
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| **Ecology** |
| The following receptors or potential impacts/ effects will not be assessed:<br>• Fish;<br>• Water Voles; and<br>• Saltmarsh (this habitat will be assessed as part of the Marine Ecology Chapter). |
| **Archaeology and Cultural Heritage** |
| An ASIDOHL2 assessment. |
| **Ground Conditions (including Waste)** |
| Environmental Appraisal of waste (Outline Waste Management Plan instead focusing on construction phase). |
| **Agriculture and Land Use** |
| Potential impacts on land use and agriculture during operational phase.<br>Potential economic effects that the Proposed Project will have on individual landowners and farmers.<br>Temporary land take during the construction and decommissioning phases. |
| **Air Quality** |
| Potential impacts/ effects during construction, operation and decommissioning (a Dust Risk Assessment has been prepared). |
| **Traffic and Transport** |
| Parking Assessment.<br>Separate Transport Assessment.<br>Vehicle movements associated with access to the SEC and tunnel head houses during operational phase.<br>Decommissioning phase. |
| **Socio-Economics and Tourism** |
| Changes in the incidence of crime or fear of crime.<br>A quantitative assessment of employment and expenditure effects.<br>Potential effects on non-agricultural land.<br>Potential effects on Welsh Language. |
| **Noise and Vibration** |
| Baseline ground borne vibration surveys.<br>Operational noise and vibration from the underground cables, SEC and terminal pylon, including fixtures and fittings, as well as vibration from tunnel head house ventilation |

| Aspects Scoped Out of Environmental Reporting (Scoping Report, 2018) |
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| plant.<br>Assessment of operational traffic noise. |
| **Climate Change** |
| A climate change chapter has not been included, although climate change is assessed within relevant sections of the Environmental Appraisal. |
| **Health Impact Assessment** |
| A standalone Health in Impact Assessment has been scoped out, although it has been agreed that a signposting chapter will be prepared directing the relevant authorities to those parts of the report where human health is a key consideration. |

3.2.4 A table summarising the scoping opinions received and how these opinions have influenced the scope of the Environmental Appraisal is presented in Appendix 3B.

3.2.5 As part of the Screening and Scoping Report (October 2018) National Grid proposed to prepare an Environmental Assessment Report covering all elements of the Proposed Project commensurate with that of a formal ES. However, following discussions with Local Planning Authorities responsible for consenting the VIP Projects which were screened as non-EIA development, an Environmental Appraisal was deemed more appropriate. This approach was agreed with Snowdonia National Park Authority and Natural Resources Wales.

## 3.3 Environmental Appraisal Methodology

3.3.1 Although this appraisal is not a formal EIA, the topics which it addresses are those that would be found in such a report. This appraisal contains the necessary information for interested parties to determine the likely effects of the Proposed Project on the environment. It is the culmination of a series of studies and discussions to identify the nature of the existing environment, identify the potential impacts, and allow the formulation of mitigation measures using the mitigation hierarchy. It will also enable National Grid to construct and operate the Proposed Project in a manner which will minimise the effects on the environment.

3.3.2 Published best practice guidelines have been used, where available and appropriate.

3.3.3 The production of this Environmental Appraisal is just one stage of the environmental assessment process. Environmental assessment will continue throughout the detailed design, construction and operational phases of the Proposed Project to ensure that the environment is appropriately protected, both during and subsequent to the implementation of the Proposed Project.

### *Establishment of Baseline Environment*

3.3.4 The Environmental Appraisal of scoped-in environmental aspects commenced with the identification and review of information relating to known, or the likely presence of, environmental receptors and resources within a defined Study Area in order to determine their relative value, importance and/or sensitivity towards change.

3.3.5 Desk-based data sources have comprised consultation responses; published literature; databases, records and schedules relating to environmental designations; national, regional and local policy documentation; historic and current mapping and aerial photography.

3.3.6 Site surveys have been undertaken to verify and consolidate information gathered during the desk-based review.

3.3.7 Study Area extents vary in accordance with the environmental aspect being considered. For some topics, a Study Area has been defined as being relatively localised to the Proposed Project, while for others it has extended outward. The definition of each Study Area is provided in the prevailing topic chapter and has been informed by a review of the relationship between the Proposed Project and the receiving environment, the outcomes of scoping, and reference to thresholds stipulated in topic-specific guidance. For the purposes of baseline data collection in early project conception, all technical disciplines began with an Area of Search for Permanent and Temporary Works in lieu of a defined Proposed Project. At the outset of the Proposed Project the Area of Search for Permanent and Temporary Works (which encompasses a Marine Project Area) formed the maximum extent (potential land take) of the Proposed Project taking into consideration all potential engineering options. The Area of Search for Permanent and Temporary Works formed the basis of all Study Areas for baseline data collection and is shown on Figure 1.1.

***Impact Prediction and Assessment***

3.3.8 The Site Boundary[2] (shown on constraints mapping in Volume 3 of the Environmental Appraisal) is the boundary of the above ground parts of the Proposed Project comprising the tunnel shafts, laydown/working areas, permanent and temporary access tracks, crane pads, replacement pylon foundations, tunnel head houses and associated compounds. There is the potential for direct and indirect impact on receptors from the works which will take place within the Site Boundary.

3.3.9 Impacts comprise identifiable changes to the baseline environment. These can be either beneficial (e.g. introduction of planting to screen visually detracting elements) or adverse (e.g. loss of an environmental component).

3.3.10 Appraisals may be quantitative or qualitative in nature and are based on comparisons between the environmental conditions immediately prior to the assumed construction of the Proposed Project and the predicted environment conditions resulting from its implementation.

3.3.11 Impacts have been discussed in an appraisal format following relevant guidance for each technical discipline. Appraisal has been undertaken for the construction, operation and decommissioning phases.

3.3.12 Environmental effects are defined as the consequence of impacts. Professional judgement, defined thresholds, established criteria and standards have been used to report the environmental effects of impacts, which can be referred to as either being prior to, or following establishment of, environmental mitigation.

3.3.13 Each technical discipline has further refined the appraisal methodology as per the relevant standards / guidelines for the particular discipline.

***Environmental Mitigation***

3.3.14 Mitigation has been developed to reduce environmental impacts and effects to an acceptable level and can take the following forms:

[2] Excluding the alignment of the tunnel.

- Primary or 'embedded' mitigation measures developed through the iterative design process that have become integrated mainstream components of the design of the Proposed Project (See Appendix 3C);
- Standard construction practices for avoiding and minimising environmental effects. For example, best practice construction management measures; and
- Additional (or secondary) mitigation measures which are designed to further reduce impacts remaining after primary measures and standard construction practices have been applied to the Proposed Project.

3.3.15 The principles adopted in the identification and development of environmental mitigation for the Proposed Project are avoidance (wherever possible), reduction (where avoidance cannot be achieved) and compensation (where reduction is unachievable or would not achieve the required level of mitigation).

3.3.16 National Grid have undertaken the Environmental Appraisal of the Proposed Project as a whole. The Environmental Appraisal has been undertaken following best practice guidance and suggests mitigation and monitoring where deemed appropriate irrespective of the applicable consenting regime. Proposed monitoring which will be undertaken during construction is defined within the relevant sections of the Outline Construction Environmental Management Plan and the supporting management plans which are appended. This information will be brought together within a chapter of the Construction Environmental Management Plan (which will be prepared by National Grids appointed construction contractor) to form a monitoring framework.

***Cumulative Effects***

3.3.17 For the purpose of this Environmental Appraisal, inter-project effects and intra-project effects have been considered. These two types of cumulative effects are explained below.

- Inter-Project Effects: The combined effects of the Proposed Project with other relevant developments.
- Intra-Project Effects: The combined effects arising as a result of the Proposed Project, for example upon a single receptor or resource.

3.3.18 Cumulative impacts arising from the Proposed Project have been addressed in Chapter 18 (Cumulative Impacts) which addresses inter-project and intra-project effects.

## 3.4 Outline Construction Environmental Management Plan

3.4.1 An Outline Construction Environmental Management Plan (CEMP) has been prepared to support the planning application. The CEMP presents the general approach and application of environmental management and mitigation for the construction of the Proposed Project. The CEMP aims to ensure that potentially adverse effects from the construction phase on the environment and local communities are minimised.

## 3.5 Assumptions, Uncertainties and Limitations

3.5.1 The Environmental Appraisal has been compiled using the parameters of the Proposed Project at the time of writing at conceptual design phase therefore some of the technical aspects of the construction and operation have yet to be determined.

3.5.2 Every effort has been made to obtain data concerning the existing environment and to accurately predict the effect of the Proposed Project.

3.5.3 Assumptions adopted in the evaluation of impacts are reported in the individual topic chapters.

3.5.4 The Environmental Appraisal has taken a precautionary approach to adopt conservatism in the assumptions made and any scenarios assumed, so that a reasonable 'worst-case' scenario has been assessed.