

Adran yr Economi a'r Seilwaith
Department for Economy and Infrastructure



Llywodraeth Cymru
Welsh Government

**THE CHESTER TO BANGOR TRUNK ROAD (A55) (JUNCTIONS 16 AND 16A
IMPROVEMENT REALIGNMENT AND SLIP ROADS) ORDER 202-**

**THE CHESTER TO BANGOR TRUNK ROAD (A55) (JUNCTIONS 16 AND 16A
IMPROVEMENT REALIGNMENT AND SLIP ROADS) (SIDE ROADS) ORDER 202-**

**THE WELSH MINISTERS (THE CHESTER TO BANGOR TRUNK ROAD (A55)
(JUNCTIONS 16 AND 16A IMPROVEMENT REALIGNMENT AND SLIP ROADS))
COMPULSORY PURCHASE ORDER 202-**

SUMMARY PROOF OF EVIDENCE

Note: See Document Reference WG 1.06.02 for full evidence and referencing

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WELSH GOVERNMENT, ENVIRONMENT

DOCUMENT REFERENCE: WG 1.06.01

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1. Author

- 1.1 I am Andrew Sumner, Chartered Landscape Architect and member of the Landscape Institute with 39 years of experience. I am Environmental Coordinator for the Scheme.
- 1.2 This overview of the Junction 16 and 16A Scheme sets out the reasons for the proposed environmental mitigation and associated compulsory purchase of land for that purpose.
- 1.3 I have been assisted by colleagues who have prepared their own proofs of evidence within their expertise. My references to design apply to environmental matters and mitigation.

2. Environmental Impact Assessment Process

- 2.1 The Environmental Impact Assessment (EIA) accords with current UK legislation. Screening determined that the Scheme would be of more than local importance and a Statutory EIA has been completed.
- 2.2 A Statement to Inform an Appropriate Assessment has been prepared covering Stage 1 (Test of Likely Significant Effect) and Stage 2 (Appropriate Assessment) of the Assessment of the Implications on European Sites.

Consultations

- 2.3 Environment Liaison Group (ELG) meetings, organised between 2018 and 2019, were attended by Welsh Government representatives, and the statutory environmental consultees who assisted in developing the environmental objectives and commenting on the EIA Screening and Scoping Reports, draft Environmental Masterplans and the draft Environmental Statement (ES).

Designated Sites

- 2.4 The setting contains environmental designations that include Special Protection Areas, Special Areas of Conservation, Sites of Special Scientific Interest, Snowdonia National Park and the North Llechwedd Registered Historic Landscape.

3. EIA Topics

Assessment Methodologies

- 3.1 ES topic chapters apply methods of assessment applicable at the time the assessment was carried out. The following is a summary of the findings of the ES.

Geology and Soils

- 3.2 There are no significant effects on the geology, mineral reserves, soils, watercourses, groundwater. There are no significant risks to the public of being exposed to contamination.

Road Drainage and Water Environment

- 3.3 The coastal waters north of the Scheme are protected due to the importance of the marine and inter-tidal habitat. The sea has excellent water quality for bathing. The Afon Gyrach has 'Good' status. Construction and operation of the Scheme would not result in any significant adverse effect on flooding, water quality or drainage.

Nature Conservation

- 3.4 The effects of the Scheme would not adversely affect the integrity of SAC or the SPA. Construction would disturb species including bats and birds. Overall, the Scheme would be beneficial with an increase in the area of vegetated habitats, including species rich grassland and mixed evergreen and deciduous trees and shrubs.

Landscape and Views

- 3.5 The Scheme would increase the width of the road corridor, but proposed mitigation would protect the highly scenic qualities of the surrounding upland areas to the south including the Snowdonia National Park and views from residential areas to the south, while keeping open views of the sea. There would be localised loss of existing roadside planting during construction which would open up views to the road and to the sea from Maes y Llan. The residents here prefer to have views to the sea rather than replacement planting.

Archaeology and Cultural Heritage

- 3.6 There are no direct impacts on designated sites, although an increase traffic noise is considered to be a potential indirect impact without mitigation. There is potential for direct impact on discovered and previously unknown sites within the Scheme footprint.

Community Assets

- 3.7 There would be a slight adverse effect on farmland having a slight adverse effect on two farm businesses. There would be a large adverse effect on the viability of a land allocation at Maes y Llan and on a contingency employment allocation at Puffin Services. The provision of Active Travel routes would have a beneficial effect on the community.

Air Quality

- 3.8 With mitigation in place construction activities would not have a significant adverse effect.
- 3.9 When the Scheme is operational, there would be a reduction in vehicle emissions with an overall slight improvement in air quality. The effects of the Scheme are judged to be not significant for both human and ecological receptors.

Noise and Vibration

- 3.10 During construction, with mitigation in place there residual construction noise would be not significant.
- 3.11 During operation nearby properties in Maes y Llan, which is a Noise Action Plan Priority Area (NAPPA), would experience a traffic noise increase of less than 2.9 dB, while most residential properties would experience a decrease in noise. Mitigation includes low noise surfacing along the proposed link road, a false cutting and a noise barrier which would reduce traffic noise for all receptors.

All Travellers

- 3.12 The contractor would be required to manage diversions and road closures. There would be minor disruption to traffic. Drivers on the A55 would experience increased stress as a result of the narrowed lanes but when operational, the Scheme would reduce driver stress.

Materials

- 3.13 Suitable materials would be reused from the existing road, with 400 tonnes of waste taken to landfill. A requirement for the import of around 113,0000 m³ of construction fill would potentially be significant effect. With adequate reuse and recycling assessment concluded that there will be no significant residual environmental effects.

Climate Change

- 3.14 Construction of the Scheme would produce emissions of 11,603 tonnes of CO₂. This represents a fraction of 1% of the carbon budget and is not expected to materially affect the Welsh Government's ability to achieve that budget.

3.15 Without considering the switch to electric vehicles, replacing stop-start driving conditions with free-flowing traffic would contribute to reducing vehicle emissions but overall, would increase CO₂ by 1,005 tonnes compared with the 'Do minimum'.

3.16 The Scheme is not vulnerable to the effects of Climate Change.

Risk of Accident and Disaster

3.17 The Scheme would not worsen the consequences for the environment but could result in closure of the A55 for a period while damage is repaired. Mitigation for these events would include advanced planning for the consequences of major accidents and disasters.

Population and Human Health

3.18 The assessment concluded that there would be adverse effects resulting from construction noise and driver stress. During earthworks the risk of dust soiling is likely to be highest but with mitigation in place the risk to human health would be negligible. Vibration impacts could be significant around Maes y Llan.

3.19 Traffic noise during operation of the Scheme would be mitigated, resulting in a noise level decrease at a majority of the receptors. When the Scheme is in operation there would be beneficial effects brought about by reduced driver stress and a reduction in road accidents.

Cumulative Effects

3.20 The assessment identifies a 'modest' cumulative effect arising from multiple sources within the Scheme and of effects arising from the Junctions 16 and 16A Improvements. Cumulative effects can be minimised or avoided through coordinated construction planning of the schemes.

Preliminary Design of the Scheme

3.21 The design of the preferred option was developed to reduce or avoid impacts. A mitigation strategy, based on the environmental objectives, was developed and applied to the developing design.

4. Mitigation Environmental Management and Land Requirements

- 4.1 Mitigation measures, shown in the Environmental Masterplan and described in the ES are integral and essential to the Scheme.
- 4.2 Where possible, environmental mitigation has been provided within the permanent land take (Title). Additional land, required for environmental mitigation only (Title Mitigation) would also be taken.

5. Objections to the Scheme

5.1 Objections raise matters that fall within the scope of my proof of evidence

Natural Resources Wales

5.2 We have prepared a comprehensive response that addresses each point in the NRW letter of objection.

Construction Effects

5.3 Objections refer to the physical disruption, dust and noise effects of construction and the need for the contractor to liaise with residents.

Operational Effects

5.4 Objections have raised concerns about:

- a) Using large volumes of concrete would adversely affect the climate
- b) The release of carbon would adversely affect the climate
- c) Adverse effect on future generations
- d) Flooding problems on Ysguborwen Road
- e) Visual impact on views from the National Park
- f) The lack of wildflowers in the Scheme
- g) The need to have open views to the sea from Maes-y-Llan
- h) The adequacy of the proposed replacement public open space
- i) Traffic noise and air pollution from faster traffic
- j) Benefits to local people and long-distance travellers.

6. Conclusion and Declaration

- 6.1 My evidence includes facts which I regard as being relevant to the opinions which I have expressed. In my opinion the Environmental Impact Assessment and the Appropriate Assessment have been carried out and published in accordance with legislation and published professional guidance.
- 6.2 In my opinion the development of measures to mitigate the effects of the Scheme are effective, justifiable and achievable within the proposed CPO.
- 6.3 I believe the facts I have stated in this proof of evidence are true and that the opinions expressed are correct.
- 6.4 I understand my duty to the Inquiry to assist it with matters within my expertise and believe that I have complied with that duty.