



CYNGOR SIR
YNYS MÔN
ISLE OF ANGLESEY
COUNTY COUNCIL

Mr Jon Suckley
HOW Planning LLP
40 Peter Street
Manchester
United Kingdom
M2 5GP.

DEWI FRANCIS JONES
Rheolwr Datblygu Cynllunio /
Planning Development Manager
CYNGOR SIR YNYS MÔN
ISLE OF ANGLESEY COUNTY COUNCIL
Swyddfa'r Sir
LLANGEFNI
Ynys Môn / Anglesey LL77 7TW
☎ (01248) 752428 ☎ (01248) 752412
🌐 www.ynysmon.gov.uk
www.anglesey.gov.uk

Gofynnwch am/Ask for: **D P Jones**
☎ (01248) 752421
✉ njxpl@ynysmon.gov.uk

Ein Cyf. / Our Ref: **46C427K/TR/EIA/ECON**

Dyddiad / Date: 31.05.13

Dear Sir,

The Town & Country Planning Act 1990 (as amended)
The Town and Country Planning Act 1990
The Town and Country Planning (Applications) Regulations 1988
The Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999
Re: Penrhos, Cae Glas and Kingsland.
Planning Application No: 46C427K/TR/EIA/ECON

I refer to the above planning application, which is presently being considered and would be grateful if you would provide the information requested in the enclosed Table 1 – Request for Further Information under the above regulations.

In addition to the information requested in Table 1 I understand that you intend to amend the planning application as follows:

- Where a change of use planning permission of buildings is required they will be proposed in full detail resulting in the planning application becoming a 'hybrid' planning application.
- The proposals in so far as they relate to the Boat House and Bathing House will now be changed to replacement buildings.
- Change the proposal so that *kingsland* is used in the first instance for nuclear workers accommodation.

Under regulation 19 we request that that you detail any significant effect on the environment as resulting from the above change which was not assessed as part of the originally submitted Environmental Statement.

In relation to the change of use we request that you demonstrate by reference to development plan and other material planning policies that your submission provides all requisite information under the provisions of the above act and the development plan and other material policy considerations.

We also request that that all supporting documents are amended to reflect the amendment to

the planning application.

Inclusion in the Landscape and Visual Impact Assessment of the new build proposals in so far as it relates to the Boat House and Bathing House.

It may be necessary to request further information as our Highways Section are still reviewing the Transport Assessment, Framework TIS and the Travel Plan.

I would be grateful if you would provide the above information within 14 days of the date of this letter, should you require additional time to make the submission please confirm in writing.

This letter is at officer level only and does not constitute a formal determination under the planning acts by the Planning Committee.

You are advised that a recommendation of approval will not be necessarily forthcoming by the provision of the requested information.

In accordance with Section 7 of Regulation 19 of the EIA Regulations, IOACC will suspend determination of the application and will not determine it before the expiry of 14 days after the date on which the further information was sent to all persons to whom the ES to which it relates was sent or the expiry of 21 days after the date that the notice of it was published in a local newspaper, whichever is the later.

The applicant may also wish to submit development mitigation proposals to the local planning authority at the appropriate time.

If you wish to discuss any aspect of 752149 or by e-mail at DPJPL@an

contact Mr. David P. Jones on 01248



Dewi Francis Jones
Planning Development Manager

Table 1 – Request for Further Information

Consultee & Response	Information Requested Under Regulation 19	Information Requested Under Regulation 4
Local Member Llanfaethlu: No formal response received.		
Local Member Morawelon: No formal response received.		
Local Member Kingsland: No formal response received.		
Local Member London Road: Phoned the department early January, stating that he had not been consulted on the application. The department has subsequently re-sent the original documentation. At the time of writing this report no formal response has been received.		
Local Member Trearddur Bay: No formal response received.		
Local Member Valley: No formal response received.		
The Council for British Archaeology: No comments at this stage but are keen to be involved in the process.		
Holyhead Town Council: Satisfied for the application to be considered in outline form. Recommend that some form of transport is provided to link the proposal to Holyhead Town, Newry Beach and the Breakwater and that during the construction phase the developers employ local people.		
Llanfachraeth Community Council: No formal response.		

Table 1 – Request for Further Information

<p>Trearddur Bay Community Council: Concerns raised regarding environmental impact and effect on the wildlife. Given the scale of the development the Community Council considered there should be a separate public consultation on the three sites separately.</p>		
<p>Valley Community Council: Despite assurances provided by the Officers, members continue to be concerned about such a project, which they believe will have a considerable effect on the wider community and wish to table their concerns in writing, so that they may be considered by the Council.</p> <p>1. There is significant concern about the size of the development and its impact, in particular:-</p> <ul style="list-style-type: none"> - The detrimental effect it will have on the natural landscape within a designated AONB. - Increased pressure on the existing road network and the environmental impact of any plans to strengthen existing road infrastructure. - Increased pressure on existing services, e.g. schools, doctors/hospitals, policing. This is of particular concern at a time when the NHS, Local Council and North Wales Police are already highlighting that existing budgets are under pressure and that more cuts in service are inevitable. - The possible impact on both local culture and the Welsh language, particularly if there was an influx of foreign workers. <p>2. The Kingsland Development -</p> <ul style="list-style-type: none"> - A need to ensure that local housing need is considered, 	<p>The Welsh Language Assessment should include additional information in accordance with comments received from consultees.</p>	

Table 1 – Request for Further Information

<p>particularly the need for social housing to rent at a time when so many local families are going to be heavily affected by the impending Bedroom Tax being imposed by the Government.</p> <p>- There was some concern at the statement “up to 50% affordable housing”. The statement was met with some scepticism, as a result of developments, with a percentage of affordable housing, being approved in Valley in the past. Commuted sums had been paid by the developer; however, these had not resulted in affordable homes being built in the village for local people. Whilst it is appreciated that this fell outside the officers’ remit, it is nevertheless a valuable point for future consideration.</p> <p>3. Concern about the quality and the number of likely jobs within any leisure village/temporary accommodation complex for Wyifa Workers. Historically, these types of jobs have been low paid.</p>	<p>The Economic Need and Benefits Report and Socio-economics, Regeneration and Health ES Chapter should be updated to include additional analysis of social impacts of workers accommodation, employment and skills, tourism impacts and supply chain impacts. This is in response to the points raised by the Council’s Economic Development Unit.</p>	
<p>Crown Estate Office: No formal response.</p> <p>Highways: Messrs Mott Macdonald has been commissioned to assess the Transport Assessment submitted with the application. There are a number of significant issues which require being resolved before the Transport Assessment is considered to be</p>	<p>Further information is requested in relation to highways and transport in response to the Mott</p>	<p>The revisions to the access arrangements at Kingsland will need to be reflected in the</p>

Table 1 – Request for Further Information

<p>acceptable.</p>	<p>Macdonald review of the Transport Assessment.</p> <p>The revisions to the access arrangements at Kingsland will need to be reflected in the submission plans and drawings and as necessary in the LVIA.</p> <p>Clarity is required as regard the policy requirements of Technical Advice Note 18 Transport in relation to planning applications for major developments.</p>	<p>submission plans and drawings.</p>
<p>Maritime Officer: No observations.</p> <p>Joint Planning Policy Unit:</p> <p>Main planning issues raised as follows:</p> <p>Penrhos:</p> <p>Retail - Further information regarding the retail offer on site and accessibility (is the retail element of the development accessible to the public?). Further information could aid with determining the need for a Retail Impact Assessment. Although the threshold within TAN4 is 2,500m² it is also stated that there may be instances where an RIA could be required for smaller scale development.</p> <p><input type="checkbox"/> Conversion of existing buildings - The supporting documentation indicates that it is the intention of the developer to re-use some of the current buildings on site. The buildings intended for re-use are Grade II listed buildings. In accordance the principles of Policy 55</p>	<p>The Welsh Language Assessment should include additional information in accordance with comments received from consultees.</p> <p>Further information on the main alternatives studied by the applicant and an indication of the main reasons for his choice, taking into account the environmental effects.</p>	<p>The re-submission should address any material changes planning policy since the submission of the planning application, notably Planning Policy Wales (Edition 5, November 2012) PPW.</p> <p>5.5.6 (AONB) further information on</p> <ul style="list-style-type: none"> • <i>the cost of an scope for providing the development</i>

Table 1 – Request for Further Information

<p>– ‘Conversion’ contained in the Local Plan, it needs to be ensured that buildings proposed for conversion are structurally sound and capable of being converted without extensive rebuilding or extension tantamount to the erection of a new dwelling. Careful consideration will also have to be given to Policy 41: Conservation of Buildings, which states that listed buildings should be protected from unsympathetic development, alterations or demolition. Further guidance on the conversion of rural buildings is given in the Supplementary Planning Guidance: ‘Design in the Urban and Rural Built Environment’. The intention includes converting the Penrhos Manor Estate House into a Spa, converting the Bathing House into a Restaurant and converting the Boat House into a Water sport Centre. The lack of supporting evidence, specifically relating to the structure of the buildings means that it is not possible to determine if this aspect of the proposal conforms to local policy.</p> <p><input type="checkbox"/> In accordance with TAN 18 and Planning Policy Wales there is a need to ensure sustainable linkages between the Penrhos site and the town centre, allowing easy and sustainable access leading to community benefit from the development. However, caution needs to be taken with the linkages as ease of accessibility could lead to the public being able to take advantage of the facilities and retail offer on-site which shouldn’t be encouraged.</p> <p>Cae Glas:</p> <ul style="list-style-type: none"> - Stopped UDP Policy EN2 and PPW (Edition 5, 2012) 5.3.5 – 5.3.7 & 5.5.6 – major development in an AONB – are there exceptional circumstances to justify consent? <p>Whilst the JPPU considers that the national need for the development has been addressed, the JPPU questions whether the ‘alternative sites’ test has been fully</p>	<p><i>outside the designated area or meeting the need for it in some other way;</i></p> <p>Clarity is required in relation PPW, the development plan and other material policy considerations in relation to coastal locations and the need for the development to be on the coast. In particular, the provisions that undeveloped coast will rarely be the most appropriate location for development.</p> <p>Consideration is required of the key tests in Technical Advice Note 16 Sport, Recreation and Open Space as regards planning applications for major developments.</p>
--	--

Table 1 – Request for Further Information

<p>addressed.</p> <ul style="list-style-type: none"> - Stopped UDP Policy GP1 and PPW (Edition 5, 2012) 2.4.4 & 3.1.4 – aware that the Health Impact Assessment Report and Chapter 8 of the ES considers the impact of accommodating a relatively large number of migrant construction workers on the local community and elements of the physical and community infrastructure. It is noted that anticipated mitigation measures could include a possible 'Corporate Health Policy' (although not clear what that would entail), and provision of some on site health and leisure facilities in order that "workers remain predominantly onsite". Nonetheless the ES recognises "it is inevitable that some will visit Holyhead and could interact with the community in a negative or anti-social way". Reference is made to a code of conduct measure. There is also reference to possible impacts in the WLIA. The JPPU has concerns that the extent to which the proposal places demands on physical and community infrastructure and local amenity has been given a light touch approach and would benefit from more attention/ clarity. A separate note will be provided that sets out advice relating to the WLIA. The Council is keen to see local communities benefit from the presence of an increased number of workers in the area, - increased commercial activity. This aspect doesn't seem to have been addressed or if it has it needs to be highlighted. - linked to the previous point and stopped UDP Policy CC1 & GP1, PPW (Edition 5 2012) 11.3, TAN 16 Sports, Recreation and Open Spaces and TAN 18 – welcome the commitment to provide alternative locations for displaced 		
--	--	--

Table 1 – Request for Further Information

<p>football and cricket pitches. Evidence suggests that the alternative facilities will be available to public and visitors alike. This assumption seems to be at odds with the intention to limit interaction between construction workers and local community. Proposed cricket pitch site is detached from the Cae Glas visitor/ construction workers' accommodation and more importantly detached from the existing built form of Holyhead, - issues relating to accessibility by means other than the private car, particularly given the existence of deprived communities/ disadvantaged groups. stopped UDP Policy GP1, PPW (Edition 5, 2012) various, including 4.7.2 & TAN 18 – on the basis that it is inevitable that construction workers (and eventually the visitors) will want to take advantage of services and facilities available in Holyhead and that the Council wishes to ensure that local communities benefit from development, e.g. increased commercial activity, sustainable linkages between the Cae Glas site and the town centre needs to be addressed.</p>		
<p>- stopped UDP Policy PO2, EP2, HP6 and PPW (Edition 5, 2012) various, including 4.4.3 & 4.7 – temporary permission being sought for what is essentially residential development on land where planning permission wouldn't normally be given for this type of use. Need to address how this temporary use will be managed in accordance with local and national planning policy – use of suitable mechanism to, for example, (i) limit the use to a specific period and that (a) either the accommodation units are removed from the site and land restored (scenario if the 2nd Phase of the Penrhos Leisure Village doesn't materialise), or (b) the occupation of the units post specific</p>		

Table 1 – Request for Further Information

<p>date will be limited to holiday use; (ii) the occupation of the accommodation units until x should be limited to construction workers mainly employed by Horizon/Hitachi, (iii) register of all construction workers living in the accommodation units should be kept and made available to the LPA on request.</p> <p>Kingsland</p> <p>Need for the Proposal</p> <ul style="list-style-type: none"> - Paragraph 8.11 of the Supporting Planning Statement refers to the interrelationship between the funding from the housing to support the leisure development. However, the viability analysis only includes figures for the housing element of the proposal. The Council needs to be satisfied that this is acceptable and that a viability analysis of the whole proposal is not required. In line with the policy should the Council seek an independent opinion on the information contained in the viability analysis then instructions need to be given over this work (a brief is prepared and the applicant is allowed to review its content prior to commissioning an independent expert to analyse the figures). - The Housing Service has commissioned an updated Local Housing Market Assessment for Ynys Môn. Whilst the final report is still to be published the key findings in terms of affordable housing need is that there is a significant increase in the requirements across the whole Island. Subject to the viability appraisal the provision of affordable housing on the site will contribute towards meeting this level of need. - The Housing Service has commissioned an updated Local Housing Market Assessment for Ynys Môn. Whilst the final report is still to be published the key findings in terms of affordable housing need is that there is a significant 		
--	--	--

Table 1 – Request for Further Information

<p>increase in the requirements across the whole Island. Subject to the viability appraisal the provision of affordable housing on the site will contribute towards meeting this level of need.</p> <ul style="list-style-type: none"> - The tests in paragraph 5.5.6 of PPW over development in the AONB are referred to in paragraph 8.22 of the Supporting Planning Statement. The first test refers to the need for the development in terms of national considerations and the impact of permitting or refusing it on the local economy. Paragraph 8.15 and 8.16 states that a proportion of the residential development at Kingsland would be available to rent by construction workers from Land and Lakes. However, in the revised Viability Analysis Report it is stated in relation to Site Acquisition Costs that: “...taking into account the fact the applicant is not a house builder and will be selling the site to separate residential and commercial developers...”. This variation needs to be explained also consideration needs to be given whether the national test over the need for the housing element of the proposal has been satisfied. 		
<p>Location of the Proposal</p> <ul style="list-style-type: none"> - The second test in paragraph 5.5.6 of PPW is in relation to cost and scope of providing the development outside the designated area or meeting the need in some other way. Notwithstanding the fact the site lies within the stopped UDP development boundary there is a need under national policy, for major development in the AONB, to assess alternative sites for the housing element of the scheme. At present this has not been provided. - Criterion (vi) within the interim policy refers to the need to assess the suitability of the site as an extension to the settlement in terms of its biodiversity interests and wider environmentally / sustainability impacts. It is stated that the Environmental Statement submitted in support of the 		

Table 1 – Request for Further Information

<p>application, assesses such matters and that there are no concerns in respect of any of the environmental technical areas. Careful consideration needs to be given towards the evidence submitted in the Environmental Statement against any consultation responses received in relation to these matters.</p> <ul style="list-style-type: none"> - In light of the scale of housing intended on this site consideration should be given towards sustainable transport linkages to and from the site with other parts of the settlement. <p>Impact of the Proposal</p> <ul style="list-style-type: none"> - Commentary upon the submitted Welsh Language Impact Assessment (WLIA) has been prepared in a separate document by the JPPU. Whilst additional background information is felt to be required it is also felt that in relation to the housing element of the proposal: <p>The WLIA could include further data relating to housing for a more comprehensive analysis including:</p> <ul style="list-style-type: none"> • Average house prices (including trends) • 2nd / holiday homes • Housing affordability <p>The type, affordability and phasing of housing developments should be important considerations when assessing the potential impact upon the Welsh language.</p> <ul style="list-style-type: none"> - It is not clear from the indicative layout for the Kingsland proposal what type of open space provision is being offered and whether there will be a children's play area as part of the proposal. - Regard should be given towards the impact of the proposal on community facilities in the area e.g. are there 		
--	--	--

Table 1 – Request for Further Information

<p>capacity in the local schools (especially primary), the impact on local health providers etc.</p> <ul style="list-style-type: none"> - Stated that the housing proposed on the site will be of a higher council tax banding than the majority of the current provision in Holyhead. Consideration needs to be given towards the capabilities of the local community to purchase open market housing at the site. - The interim policy refers to the need for dwellings to achieve as high as possible code for sustainable homes and have regard to the implications of climate change. An energy strategy is provided in support of the Kingsland proposal and the findings within this document needs to be assessed. On previous applications the Council's Carbon Reduction Team were asked to review such documents. I understand that this group no longer exists but that the responsibility for sustainable development within the Council is under the remit of the Head of Planning and Public Protection's Service. 		
<p>Environmental & Ecological Adviser: I am concerned at the overall loss of woodland in an area with such little of this habitat and would like to see some more native woodland creation in appropriate area(s), but not at the expense of heathland, reptiles or such like. Table 10.10 has a note that the figures exclude mitigation habitats; I advise that this information is needed as well, so that overall effects can be better evaluated. It is unclear also why the Table 10.10 is contradicted by the note at page 10 – 42 (in Table 10.12); the former shows a 0.29 ha loss of reed bed, with no gains at Cae Glas or Kingsland, whilst the latter says 'replacement reed bed at Cae Glas and Kingsland will ensure no net loss' – can this be clarified? I would not like to see net loss of reed beds. The contradiction noted above is further confused by the note at 10.23¹ which clearly states that mitigation is included in both tables 10.10 and 10.12.</p>	<p>Additional ecological information is required in response to the County Ecologist's comments. This should include a lichen survey and a biodiversity method statement, along with clarification in relation to the impacts and mitigation related to woodland, reed-bed, grassland and heathland.</p>	<p>Any amendments as a result of these comments should be reflected in the Master Plans.</p>

Table 1 – Request for Further Information

<p>Comments on Master plan Maps in relation to Phase 1 Habitat Survey:</p> <p>Kingsland: Would like details of management, for example to show how heathland areas to be enhanced. Swamp and marshy area in North of site: suggest try to save some of the marshy grassland. Welcome the retention of the Western area with wetland and heathland. Also welcome tree planting on Southern edge.</p> <p>Penthos Park: Suggest new planting should include species found locally, from NW British sources .e.g. Rowan, birch, hawthorn, elder, holly.</p> <p>Cae Glas: Seek clarification on whether area marked semi-natural broad-leaved woodland to SE of visitor centre is to be lost (appears to be so). Seek more details on Cae Glas Nature Reserve. New cricket pitch takes small area of marshy grassland.</p> <p>Reptiles: I would advise that reasonable efforts be made to avoid translocation where possible – through changing design/ layout and/ or tweaking methodology. As with other species surveys, the recommended actions require further work, for example formulating RAMs (reasonable avoidance measures)</p> <p>Connected with my earlier comments about wishing to see less woodland loss, it could be helpful to have a list of sites where there are different conservation options and make decisions with the help of factors such as existing habitat, records status of species (in law) etc. This would help ensure that the best use is made of the opportunities in the proposal area.</p> <p>Requested lichen and hare survey.</p>		
--	--	--

Table 1 – Request for Further Information

<p>Overall - raised a number of issues above. Whilst there are many good points relating to the ecological side of the proposal, I feel that for a little more this could be further bettered. The biggest loss is the local impact on woodlands, but there is the opportunity to create more natural native woodlands which will have long-term high wildlife value to make up for this.</p>		
<p>Natural Resources Wales:</p> <p>Do not consider that that the application can be considered in outline form for the following reasons:</p> <ul style="list-style-type: none"> • An application in an AONB which leaves Appearance, Landscaping, Layout, and Scale as reserved matters would not normally be advisable or acceptable. • There may also be an issue as to whether an outline proposal would comply with EIA regulations. The cases of R v Rochdale MBC ex parte Tew (1999) and R v Rochdale MBC ex parte Milne (2000) are relevant. The issues whether the details provided are sufficient for an effective EIA, and the extent to which the proposal is then “tied” to the EIA. Any material changes would of course create the possibility of successful legal challenges. <p>Object to the proposal as it constitutes a major development in their view with adverse impacts on the Anglesey Area of Outstanding Natural Beauty (AONB). The main areas relating to</p>	<p>LVIA</p> <p>Additional information will need to be provided in the LVIA section of the ES Addendum clarifying the methodology and significance criteria used.</p> <p>Further evaluation of cumulative impacts of the Leisure Village alongside the Renewable Energy Plant and Parc Cybi.</p> <p>Ecology</p> <p>Further clarification will need to be provided in relation to the impact of the development on the SAC.</p>	

Table 1 – Request for Further Information

<p>the objection are:</p> <ol style="list-style-type: none"> 1) The development goes against the main statutory purpose of the AONB which is to conserve and enhance natural beauty. 2) The development does not meet the stringent tests set out in Planning Policy for Wales for Major development in the AONB. 3) The application is in outline, introducing uncertainty and difficulty in controlling the development. 4) The landscape and visual assessment does not include a clear process of evaluating sensitivity, magnitude and significance to assess impacts on the AONB. 5) Mitigation offered does not outweigh impacts. <p>Conditions have been recommended with respect to land contamination and comments have been made with respect to flood risk, foul drainage, waste and biodiversity.</p>		
<p>Economic Development: The response provides a “gap analysis” overview of where more information is required and why, rather than a detailed response on the socio-economic chapters contained within the Environmental Statement.</p> <p>The information contained within the application assumes that 2000 workers would be accommodated and that construction of the temporary accommodation would take place in 2015 with occupancy by these workers from 2016 until 2021.</p> <p>Given the scale of the worker accommodation provision and the potential for the Wylfa Nuclear New Build Workforce to occupy the Cae Glas site for a minimum of six years the on-site and off-site</p>	<p>Additional information will be required on the following key issues:</p> <ul style="list-style-type: none"> Social impacts of workers accommodation Employment and skills Cumulative impacts Clarification of significance criteria Tourism impacts Supply chain impacts 	

Table 1 – Request for Further Information

<p>impacts, and cumulative impacts with other developments including Wylfa, should be subject to full and proper assessment. It is the EDU's view that the EIA can and should be improved in this regard.</p> <p>Cumulative and combined impacts Further work needs to be done on the cumulative impacts of other projects, including the nuclear new build at Wylfa, which are not currently considered within the existing version of the ES. However, the limitations and difficulties associated with this process are recognised.</p> <p>Significance of Impacts Further information as to how significance judgements are made and quantified needs to be provided.</p> <p>Tourism A more detailed assessment of the tourism sector is required alongside further consideration of the fit of the development and its impact on the sector.</p> <p>Skills and Employment – Further information should be provided to better understand the labour supply and demand profile. Further discussion with IACC is required and formal agreement on the applicant's approach and contribution to enabling local residents to receive appropriate training. An employment and skills strategy should be developed to address these issues.</p> <p>Social Infrastructure The judgement on the significance of the impacts on services needs to be re-considered, further detail provided and the need for mitigation re-examined. This should encompass a more detailed evidence base on the existing supply of social infrastructure and services.</p> <p>Supply chain information This should be encapsulated within a combined supply chain, employment and skills strategy for the</p>		
--	--	--

Table 1 – Request for Further Information

<p>development.</p> <p>Mitigation and residual impacts The judgement on the significance of these impacts in construction and the operational phases on services needs to be re-considered, further detail provided and the need for mitigation re-examined.</p> <p>Welsh Language Further work is required to assess the impact during the relatively long construction phase of this proposal and the Wylfa Nuclear New Build workers accommodation phase thereafter.</p> <p>IACC should seek further clarification and detail in relation to the funding package and business plan for the development.</p> <p>Cumulative Impacts – Further work needs to be done on the cumulative impacts of a range of other projects, including the nuclear new build at Wylfa, which are not currently considered within the existing version of the ES.</p> <p>Combination (synergistic) impacts – In terms of combined synergistic impacts there is no consistent approach explaining how the impacts from different topics are combined to identify combinations which are significant.</p> <p>Significance of impacts - In general the judgement of significance is based solely on professional opinion. There has been no attempt to provide quantitative scale or context for the judgements on magnitude, sensitivity and consequently the significance of impacts.</p> <p>The significance of impacts is not always placed in context and can be argued to have been overstated/optimistic in some</p>		
---	--	--

Table 1 – Request for Further Information

<p>instances. Further information as to how significance judgements are made and quantified needs to be provided.</p> <p>Consistency chapter approach in the ES and the non-technical summary are inconsistent and need to be revised.</p> <p>Tourism – We would argue that the provision of the accommodation and leisure facilities has the potential to compete with the existing provision and as such the judgements on impacts need to be re-assessed. A more detailed assessment of the tourism sector is required alongside further consideration of the fit of the development and its impact on the sector.</p> <p>Skills and Employment</p> <p>Baseline & Impacts - Further information should be provided to better understand the labour supply and demand profile and ultimately, the magnitude of the impact. This would be included in an employment and skills strategy for the development.</p> <p>Social Infrastructure and Services The judgement on the significance of the impacts on services needs to be re-considered, further details provided and the need for mitigations re-examined. This should encompass a more detailed evidence base on the existing supply of social infrastructure and services.</p> <p>Supply Chain Further consideration and specifics on business opportunities should be provided. This information should be encapsulated within a combined supply chain, employment and skills strategy for the development.</p> <p>Construction phase mitigation Within the construction phase no mitigation is proposed, given the 8 year duration of the</p>	
---	--

Table 1 – Request for Further Information

<p>development, the size of the construction sector and the overlap with other projects this is critical information which should be expanded on.</p> <p>Welsh language The applicant states that given the number of jobs created there will be no impact on the Welsh language. Given the long construction phase and that Cae Glas will house 2000 construction workers further details on how the impact on the Welsh language will be addressed and mitigated during these stages of development is required.</p> <p>Transport The cumulative impacts of trips by construction workers from Cae Glas and other Wylfa B and general Wylfa traffic could be significant and should be subject to assessment.</p> <p>The review identified a number of issues which need to be addressed by the applicant in order for potential impacts of the development to be properly described and subject to an appropriate level of assessment.</p> <p>Shift patterns for workers during the plant operation may have implications with respect to the potential for noise impact on sensitive receptors.</p> <p>The impacts on the start and end of the week have also not been assessed.</p> <p>The applicant should demonstrate how private car trips will be controlled and further detail is required with respect to Travel Planning based upon a complete transport assessment that properly identifies and assesses potential transport related impacts.</p>		
--	--	--

Table 1 – Request for Further Information

<p>The issues which relate to the provision of further environmental information could be dealt with via a Regulation 19 request but an alternative may be to encourage the applicant to remove the Wyifa Nuclear New Build work element from the proposals</p> <p>Given the employment, economic and regeneration potential of the proposed development, the EDU are still principally supportive of the development. Further information is required to ensure that the benefits of such a development are fully realised through appropriate detailing and mitigation.</p> <p>The proposed development is recognised in the recently adopted Anglesey Destination Management Plan (DMP) 2012-2016 as a potential transformational development for the Island tourism sector. The tourism impacts therefore need further consideration to ensure it complements and enhances the existing tourism provision on the Island. The proposed development provides an opportunity for a new high quality @destination resort on Anglesey which in principle is supported by the EDU.</p>		
<p>Education: If Planning Application number 46C427K/TR/EIA/ECON were to go ahead, according to the formula, the Lifelong Learning Department of Anglesey Council would require contributions towards:</p> <ol style="list-style-type: none"> 1. A new primary school in the Kingsland area of £1,534,592. 2. The education of 16-18 year olds at Holyhead High School of £281,724. 3. Additional resources at Holyhead High School for 		

Table 1 – Request for Further Information

<p>11-16 year olds</p> <p>4. A new Language Centre</p> <p>5. Further development of local Youth Centres.</p> <p>Environmental Services (Health): Have made various comments with respect to the noise assessment, health and safety, water supply and food hygiene.</p>		
<p>Emergency Planning: As you are aware the neighbouring former Anglesey Aluminium Site retains a planning status as a Top Tier COMAH Site, although as the process has been removed we do not have to prepare and exercise emergency plans for that site.</p> <p>However any potential developer may consider undertaking a hazardous process at the former AAM site which if approved may trigger the COMAH threshold; there may therefore be a need for off-site plans if it's a Tier One which in turn may require special response arrangements for this development if it progresses. The developer may wish to note.</p> <p>Conversely the development of a site including several hundred people may affect the development potential of the former neighbouring AAM site and may restrict its use to non-hazardous processes below Top Tier COMAH thresholds?</p>	<p><u>Noise</u></p> <p>Additional information is requested in relation to the impacts of noise from the AAM facility, Leisure Centre and the likely noise arising from the energy centres on-site.</p>	

Table 1 – Request for Further Information

<p>North Wales Fire Service: No objection in principle to the application. Request to be consulted when additional details are submitted.</p>		
<p>Footpaths Officer: A section of the Anglesey Coastal Path (permissive agreement) goes along the coastal edge of this site and an improvement of its legal status is desirable A copy of our letter to Anglesey Aluminium Metal Ltd (dated August 2011) is enclosed, outlining this issue. Further to this, a short section of the National Cycle Route 8 goes through the site, incorporated upon Public Footpath No. 38 (Holyhead), as shown on the attached plan. This section of footpath/cycle route should not be disturbed in any way.</p> <p>Cae Glas – Whilst there are no Public Rights of Way within this site, I have attached a map showing a proposed alignment of the Anglesey Coastal Path which is desirable and could possibly be agreed with the applicant's through a section 106 agreement, thereby allowing public access through part of this site.</p> <p>Kingsland – Public footpath no. 2 (Treaddur Community) goes through this site, as shown on the attached map. It is understood that this footpath is to be incorporated within the proposed developments, and should remain unaffected.</p>		<p>Additional information will be required in relation to the status of the footpaths and PROWs.</p>
<p>Gwynedd Archaeological Planning Services:</p> <p>There is obviously a significant potential impact and some assessment and evaluation of these impacts has already been undertaken. However, I have 2 major concerns with regard to attaching conditions to this outline consent with regard to the below ground archaeological resource:</p>	<p>A statement of intent is required in relation to the first phase of archaeological mitigation which addresses the provisions of the development plan and other material policy</p>	

Table 1 – Request for Further Information

<p>1) This application adjoins the Parc Cybi site which was poorly evaluated in advance of granting consent in 2006 (see attached letter). The low percentage of sampling led to an assumption by the developers (Welsh Government) that the archaeological potential was low. It was not. The sampling strategy in this case is better informed and more targeted but still falls well below the less than 1% sample of the previous work and is therefore still inadequate in terms of managing risk and informing future mitigation. Sampling strategies generally utilise much higher percentages e.g. 5%+ to give a level of confidence that can inform a robust mitigation strategy ...</p> <p>2) The application on the Parc Cybi site has some serious outstanding issues & legal advice is being sought.</p>	<p>considerations.</p>	
<p>The Georgian Group: The Group is particularly interested in the Penrhos site due to the surviving buildings and structures associated with the Penrhos Estate. Although a substantial amount of information has been submitted by the applicant, a more thorough assessment of the site's historic structures and associated landscape is needed. The site needs to be well understood before any major change is considered. We strongly suggest that a conservation management plan is prepared before this scheme goes forward any further. This can help guide the future management of the site and identify where change might be accommodated without damaging the historic integrity of the site. The proposal as it stands is proposing to integrate the historic buildings and structures with the new build elements and therefore we feel it needs to be assessed as a full planning application with an accompanying listed building application.</p>		

Table 1 – Request for Further Information

<p>North Wales Health Authority: No formal response received.</p>		
<p>Building Control: No formal response received.</p>		
<p>Built Environment Section –</p> <p>Conservation Officer:</p> <p>Confirm that I am still, in principle, generally supportive of this application as it seeks to breathe new life back to the site. Wish to raise a concern in the way the information on the statutory protected listed buildings (LB's) has been presented, which I believe may lead to some misunderstanding and uncertainty. The DAS under Chapter 5.9 (5.2) 1.2 The Listed Buildings states “there are six listed buildings across the Penrhos site”.</p> <p>This statement is incorrect, there are seven. The missing LB is Barn and Cart sheds, Penrhos Home Farm, Cade Ref No 5767 (description and maps attached) and in fact there are 8 if you include Stanley Tollhouse, Cade Ref No 20069.</p> <p>The consultants, “Purcell” 232962 Curtilage Assessment dated October 2012 was requested by me in order to ensure that the full extent of the statutory protection under the Planning (Listed Buildings and Conservation Areas) Act 1990 had been identified and given special regard.</p> <p>Under the title Penrhos it states “The following buildings on the Penrhos site are listed specifically; and names 7 x LB’s while on the following page under the title Penrhos Bailiffs Tower and Home Farm and Barn with Cart sheds (Cade Ref 5766 & 5767) it groups these two together while stating “and the barn slightly further east, which is listed separately, (currently used by the</p>	<p>The Council’s Conservation Officer requires clarification as to the status and extent of heritage features on the site. This should be provided in the form of plans clearly showing all heritage features and their curtilage. A Heritage Management Statement should also be prepared and submitted for the Council’s approval.</p> <p>CADW LB descriptions for all the LB’s within the application site.</p> <p>2.5.2. A scaled Location Plan identifying all LB’s within the application site referring to CADW Ref Nos.</p> <p>2.5.3. A large scaled Block Plan identifying the LB and the ‘fixtures’ and the ‘objects</p>	

Table 1 – Request for Further Information

<p>Coastal Park Rangers)”. I have already confirm that I am satisfied with the consultants assessment of what else is statutory protected as well as the principal LB’s, i.e., ‘fixtures’ and ‘objects and structures within the curtilages’, however, my concern is in the way the information has been presented in that it may lead to misunderstanding and uncertainty does need to be addressed at this point in time and not be left to when Listed Building Consent (LBC) application are being formulated and submitted.</p> <p>In view of this fact I strongly recommend that the consultants should prepare and include as part of this application, the following information:</p> <p>2.5.1. Copies of the CADW LB descriptions for all the LB’s within the application site.</p> <p>2.5.2. A scaled Location Plan identifying all LB’s within the application site referring to CADW Ref Nos.</p> <p>2.5.3. A large scaled Block Plan identifying the LB and the ‘fixtures’ and the ‘objects and structures within the curtilages’.</p> <p>2.5.4. A scaled Location Plan of and identifying all the non-protected historic objects and structures within the application site at this time is also advisable.</p> <p>The justification for this recommendation:-</p> <p>Reasons: Under the Planning (Listed Buildings and Conservation Areas) Act 1990 when central government adds a historic building to the statutory register the protection is given to three things:</p> <p>(a) The principal listed building;</p>	<p>and structures within the curtilages’.</p> <p>2.5.4. A scaled Location Plan identifying all the non-protected historic objects and structures.</p>
--	---

Table 1 – Request for Further Information

<p>(b) Any object or structure fixed to the principal LB, and</p> <p>(c) Any object or structure, although not fixed to the LB, it or they are located within the curtilage of the LB and have done so since before the 1st July 1948 are also protected.</p> <p>In the case of the Penrhos site, the identification of the (b's) and (c's) above is slightly more difficult than had Penrhos House been fully functional on the date of the listing 22nd February 1993. If it had, then all the historic objects and structures on the Penrhos site would be protected.</p> <p>As it happens, this was not the case so each of the identified 'Principal' LB's have been tested by the consultants using the three-fold test for the curtilage. In some instances reference is made to adjoining walls or connected walls. So everyone is clear on the full of the extent of protection, all of the above should be mapped.</p> <p>Tree Officer:</p> <p>On the Penrhos site of the suitable areas identified in Table 5 of the Tree and Woodland assessment, W45 only is part of the indicative layout. The indicative layout proposes cottages in a number of higher value woodland and would have a significant effect on the proportion of higher value category woodland on the site. These would as the report states not be replaced in the medium term and the success of long-term establishment would depend on an equivalent area(s) becoming available. This has been discussed under mitigation in Section 4 above.</p> <p>The proposed lodges in the Quillet do have scope to retain some of the existing trees due to the age of the plantation. Where lost,</p>		
--	--	--

Table 1 – Request for Further Information

<p>trees could be more easily replaced within the shorter-term.</p> <p>The main TPO areas affected are W3 and W4. Lodge development in W68 (W3 in the TPO) would appear not to be possible without felling and re-establishment. While the sensitivity of other constraints will also guide the layout, a dense layout will have less scope for tree retention. The indicative layout would require significant areas of removal and while any development will entail tree loss, the development should seek to retain a significant part of the tree resource. The point is well made in the Tree and Woodland Assessment, section 7.40 where it states that 'the existing tree cover provides a valuable platform from which to develop a highly valuable and sustainable landscape'. The indicative layout for Penrhos affects many of the areas of greatest value identified in the report.</p> <p>The potential loss of trees and woodland are of less significance on Cae Glas; the existing woodland resource is of poorer quality and there are large open areas within the site that require no tree removals. Substantial areas of buffer are retained and there is scope for new boundary and internal planting. The implementation of woodland management to this area and improved public access would result in significant public amenity.</p> <p>The indicative layout for both areas is not of sufficient detail to quantify the exact area of tree loss and the amount of potential replacement planting. If this information is not available a worse-case scenario would be used in assessing the areas to be lost. Potential losses are not easily quantified; some trees may not be replaceable in the short to medium-term, some are more important for habitat or historical reasons. The areas unaffected by the proposed lodges and cottage development are predominately</p>	<p>An Arboriculture Impact Assessment should be prepared to evaluate the potential impact on woodland. This should include an area at Penrhos that has not yet been subject to tree survey. Furthermore, a method statement should be provided which sets out the means by which trees will be selected for removal to facilitate the development.</p>	
--	--	--

Table 1 – Request for Further Information

<p>medium and lower value areas according to the classification used. Some of the areas are young but represent varied habitat; their visibility and access can increase their amenity value.</p> <p>In the context of the above proposal the retained woodland would help screen and could enhance the setting of the proposal development. There is a potential loss of substantial areas of woodland in the Penrhos site which would be significant in terms of overall woodland area and quality. The effects on public amenity e.g. from the coastal footpath may be significant at points where the buffer is weakened by the proposed development and significant where internal routes in the woodland are affected by the development. These losses would need to be balanced against measurable additional woodland management, planting and access to other areas of the site as required by EN 14 of the Stopped UDP.</p> <p>We would recommend that the following information for Penrhos should also be submitted at this time.</p> <ol style="list-style-type: none"> 1. The tree and Woodland assessments should include all the areas potentially affected by the development such as the Penrhos farm dwellings and gardens. 2. Details on the likely vehicular routes during the construction period and at the time of use. 3. Details on the likely parking numbers and density within the existing woodland area. 4. More details on areas of woodland publically accessible in Cae Glâs 		
--	--	--

Table 1 – Request for Further Information

<p>5. Greater quantification of the areas lost (according to a worst-case scenario) in terms of tree cover and loss of public access versus areas of woodland that would become publically accessible.</p> <p>Landscape Comments</p> <p>Landscape Assessment:</p> <p>Topography is covered under Chapter 9. 107 which outlines the varying topography of all three sites</p> <p>Tree Cover under 9. 115 Fig 6a-6c in appendix 9.2.refers to trees adding landscape character to</p> <p>the setting of the historic buildings at Penrhos the existence of a TPO on part of the woodland at Penrhos and the need to retain woodland edges to maintain character and screening. Other site features Chapter 9. 126 refers to features of historical interest for the 3 sites. I would recommend that a significant depth of woodland edge / screen planting is retained to maintain character / safeguard screening at the Penrhos site and that this woodland screen is protected by a preservation order / management plan for mitigation purposes.</p> <p>Mitigation</p> <p>Mitigation & Enhancement Measures are considered in Ch9. 163 and illustrated in Fig 8a -8c in appendix 9.2 No written guidance or detail is provided on the new areas of planting, tree retention or species selection to assess these measures of mitigation. 5.2 Chapter 9. 164 refers to the iterative process in developing the design layout and the inclusion of mitigation measures forming</p>		
---	--	--

Table 1 – Request for Further Information

<p>part of the detailed design of the landscape and built form. I would recommend further information / guidance is provided in summary to better understand the approach and extent of the proposed mitigation for all 3 sites as this is imperative to alleviate / address the potential adverse impacts on the AONB.</p> <p>Building Design</p> <p>Chapter 9.169 refers to Building design and that the headland lodges have been designed to appear embedded in the landscape and that the design, orientation and positioning of the lodges on the headland have been carefully considered using natural materials to reduce potential impacts. I would recommend that further consideration should be given to reducing the height of a greater number of lodges closest to the headland than shown in the master plan to reduce the potential adverse impacts in this sensitive area close to the coastal footpath.</p> <p>6.2 The lodges within the woodland will be guided by a detailed tree survey to minimise impacts on trees of value. It is essential that BS 5837 is used to inform the final numbers of lodges and layout within the wooded areas to retain an acceptable level of tree cover for both mitigation and amenity purposes.</p> <p>7.0 Landscape Proposals</p> <p>7.1 Refers to reinstatement of formal gardens, landscape settings, increased diversity of plant species, biodiversity, management of woodlands, retention of agricultural land along the coastal edge, advanced planting on the headland prior to the development of lodges to this part of the site to provide visual screening. It also refers to the light touch approach to access woodland lodges to minimise impacts and significant new woodland planting for</p>	<p>Recommend further work should be carried out to provide an indication of the potential cumulative impacts of the development, including the proposed CHP plants.</p>	<p>Recommend that further consideration should be given to reducing the height of a greater number of lodges closest to the headland than shown in the master plan to reduce the potential adverse impacts in this sensitive area close to the coastal footpath.</p>
---	---	--

Table 1 – Request for Further Information

<p>screening and habitat creation. The areas of new woodland planting are not clearly defined and extent of advanced planting / phasing is not shown. I would recommend further information / guidance is provided on the landscape proposals in particular the areas of new screen/ advanced planting and mounding to better understand the mitigation proposals.</p> <p>9.0 Residual Impacts</p> <p>Table 9.1 Construction Phase – Predicted Landscape and Visual Impacts refers to timescale, magnitude of impact, significance of impact and confidence level. There is no reference to the receptors sensitivity i.e. high, medium or low and as such this table does not provide a full picture of landscape and visual impacts. I would recommend including receptor sensitivity in table 9.1 to provide a more robust and full assessment.</p> <p>10.0 Impact on Designated Landscapes</p> <p>Appendix 9.4 refers to the special qualities of the AONB and to what extent these qualities are present within the site. It compares their current contribution to achieving the vision for the AONB set out in the AONB Management Plan 2009-14 compared to the proposed master plans contribution to this vision.</p> <p>The assessment indicates that all the elements that contribute to achieving the AONB vision have the potential to be enhanced or introduced as part of the master plan proposals for each site, including increased awareness understanding of AONB, more recreational use, contribution to a living and working landscape. The Coastal path will be retained enhanced and managed, the Historic building elements will be retained enhanced and</p>	<p>More detailed / information / methodology required on the mitigation (3 sites) of how the potential adverse impacts within a large and substantial scale development in the AONB are addressed.</p> <p>Applicant's to respond to landscape comments.</p>	
---	---	--

Table 1 – Request for Further Information

<p>managed, Penrhos Coastal Park will be retained in part for public access and Cae Glas will have controlled public access. An explanation of controlled public access would be useful and how this is to be achieved.</p> <p>Impact on Tree Cover</p> <p>Impact on tree cover is predicted to be minor adverse at Penrhos, moderately beneficial at Cae Glas and moderately beneficial at Kingsland. All works to trees would need to be informed by BS 5837 to ensure the impacts are kept to a minimum and in accordance with the predicted impacts. I would recommend a method statement is prepared to inform the approach to reducing potential impacts on existing / retained tree cover.</p> <p>Cumulative Impacts</p> <p>9.46 Makes reference to the likelihood of cumulative impacts in association with the renewable Energy plant and Parc Cybi sites with the proposed development of Penrhos, Cae Glas and Kingsland. Limited information is provided under this section on cumulative impacts the applicant states that this is due to lack of precise information on scale massing and layout for the consented developments. I would recommend further work should be carried out to provide an indication of the potential cumulative impacts of the development.</p> <p>Summary</p> <p>The proposals will have impacts on all three sites some of which will be adverse and some beneficial. From the findings of the assessment it is clear that all 3 sites within the AONB will experience adverse landscape and visual impacts in the first 3 to</p>		
---	--	--

Table 1 – Request for Further Information

<p>8 years of development. Over 10+ years some of these impacts are likely to reduce as planting / mitigation matures. There are also potential beneficial impacts including those to the historical environment, landscape features, habitat creation, improved access to the coastal path, elements that contribute to achieving the AONB vision, Penrhos Coastal Park will be retained in part for public access and Cae Glas will be made available in part for controlled public access.</p> <p>AONB Officer</p> <p>General Comments:</p> <ul style="list-style-type: none"> • Major development(s) within a significant area of Anglesey's AONB. Reference PPW 5.5.6 – Is the policy test robust and comprehensive enough for the individual and collective sites. • More detail / information / methodology required on the mitigation (3 sites) of how the potential adverse impacts within a large and substantial scale development in the AONB are addressed. <p>Environmental Statement Volume 2:</p> <ul style="list-style-type: none"> - 9.49 - Needs to emphasise that AONB is a national designation and therefore of national importance. Incorporate PPW 5.5.6 as part of context. - 9.50 – No mention of statutory status of AONB Management Plan. Under the Countryside and Rights of Way Act (CRoW) 2000, there is a duty to produce and publish an AONB Management Plan every five years. Next statutory review of Anglesey's AONB Management Plan will commence this year and will be finalised by the end of 2014 to cover the period 2015-2019. - 		
--	--	--

Table 1 – Request for Further Information

<ul style="list-style-type: none"> - Environmental Statement Volume 3b - Appendix 9.4 - Page 2 Contents Page: Require reference to CRoW Act 2000. (See 9.50 – above) - Page 2 Contents Page: Correction - under green highlight Section 1. It should read that the Anglesey AONB Management Plan is produced by the IACC in partnership. - Page 14 Section 1: Isle of Anglesey AONB 3 The Future Vision of the AONB: Same as above bullet point. - Page 36 Section 3: Contribution of the sites to the AONB 1 Assessment of existing AONB Special Qualities within the sites. - Response: Require more clarity on differential / weighting between high, medium and low valuations to assess a more accurate value. - Page 40 Section 3: Contribution of the sites to the AONB. 2 Existing contributions of the sites to achieving the AONB vision. - Response: Penrhos and Cae Glas will also be affected by road noise – A5 and A55 and the three sites affected by night light pollution. - Page 48 Section 3: Contribution of the sites to the AONB. 3 Potential contributions of the master plans to achieving the AONB vision. - Response: Penrhos and Cae Glas will be affected by road noise – A5 and A55 and the three sites affected by night light pollution. 		
<p>Pahdi HSE: Does not advise against the development.</p>		
<p>Scottish Power: Comments regarding apparatus within the three sites.</p>		

Table 1 – Request for Further Information

<p>MOD Safeguarding and Byelaws: No safeguarding objections.</p>		
<p>Friends of the Earth Comments relate solely to the sites at Penrhos and Cae Glas.</p> <p>Loss of public access to important woodland within an AONB, used by schools. The Vision Statement in the Isle of Anglesey AONB Management Plan opens by calling for “the unique landscape, natural beauty and special qualities of the Isle of Anglesey AONB to be “conserved and enhanced for the benefit of present generations”. Similarly policy VE 4.1 of the Management Plan is to “promote access for all (where appropriate) whilst also protecting the AONB’S special qualities and the integrity of the European sites. The application is in conflict with these aspirations.</p> <p>Opportunity for public access is also cited as one of the key planning issues in Section 2.1 of the 1996 Ynys Mon Local Plan. Similarly section 14.1 of the Stopped UDP recognises that the opportunities for public access to the countryside, beach and coast together with its distinctive culture and language are vitally important assets that the planning system must seek to manage, conserve, protect and promote through and use decisions.</p> <p>Retention of public access to limited area does not in our opinion compensate adequately for the loss of public access to the whole area.</p> <p>Tree Loss</p> <p>Impact on Badgers.</p> <p>Impact on bats.</p> <p>If the planning application is approved 16 conditions are recommended.</p>		

Table 1 – Request for Further Information

<ol style="list-style-type: none"> 1. Development of a long terms management plan (to be agreed with relevant bodies) for the Penrhos site. 2. Development of a long terms management plan (to be agreed with relevant bodies) for Pet Cemetery, War Memorial and Pump House. 3. Development of a long terms management plan (to be agreed with relevant bodies) for the Cae Glas site. 4. Adherence to exemplary standards of design for all buildings. 5 & 6 Provision of an adherence to detailed plans for native tree planting. 7. Conditions to protect the 7 listed buildings at Penrhos. 8. Conditions to ensure the creation of a nature reserve at Cae Glas. 9. Conditions to protect protected species. 10. Mitigation in the course of construction. 11. Exclusion of motor boats and motor boat based activities. 12. Restricted areas to protect birds. 13 Conditions relating to Energy use. 14. Conditions to ensure light pollution is minimised. 15. Conditions relating to noise pollution. 16. Translocation of threatened bluebell stands to other locations. 		
<p>North Wales Wildlife Trust: Have raised an objection to the application within an Area of Outstanding Natural Beauty and are particularly concerned that the application has been presented in outline form which lacks details. The Trust have stated that the detailed comments are mostly associated with the policy setting for the application.</p>		
<p>The Society for the Protection of Ancient Buildings:</p> <p>The proposal will have significant physical impact on the fabric of</p>		

Table 1 – Request for Further Information

<p>the listed buildings and structures as well as having a major impact on their setting. The application in outline form does not have sufficient depth of information in order to properly assess the impact of the scheme on the designated historic environment.</p>		
<p>The Ramblers Association: No formal response received.</p>		
<p>Network Rail: Have stated that whilst the proposal will not affect any level crossings in the area, there are concerned that the proposal will increase the risk of trespass upon the operational railway, and have made recommendations regarding this and works situated close to network rails land. Subsequently confirmed that since the A55 sits between the proposal at Cae Glas and the railway, therefore the trespass proof fencing is not applicable.</p>		
<p>Royal Society for the Protection of Birds (RSPB): The RSPB do not consider that the Local Planning Authority should determine the application separately from all or any of the reserved matters, as it is not possible to assess the likely significant adverse impacts of the scheme as a whole based on limited information.</p>		
<p>Red Squirrel: Society Red squirrels are present throughout Cae Glas and there is evidence that the species is present in Penrhos. Comments made as regard the composition of a tree re-planting scheme and the impacts of canopy fragmentation. Mitigation for the impact of disturbance of red squirrels during construction phase needs to be outlined in more detail.</p>		
<p>Secure by Design: No formal response received.</p>	<p>Please provide clarity on Secure by Design issues but also wider social issues in</p>	

Table 1 – Request for Further Information

		relation to crime.
<p>Drainage Section: Have requested that detailed designs and construction proposals will need to be submitted with any subsequent reserved matters application or full application.</p>		
<p>The Victorian Society: No formal response received.</p>		
<p>Welsh Government (Transport) – As highway authority for the A55 trunk road directs that any permission granted includes the following conditions:</p> <ol style="list-style-type: none"> 1. Prior to use of Cae Glas as workers accommodation associated with any proposed works at Wylfa Nuclear power station, full details of the forecast trip generation and mitigation of the impact on the trunk road network shall be submitted to an approved in writing by the highway authority in writing. 2. A Transport Implementation Strategy in accordance with the requirements of Technical Advice Note 18: Transport (TAN 18) covering the development hereby permitted shall be submitted to an approved in writing by the local planning authority in consultation with the highway authority prior to the commencement of any works on site. <p>The above conditions are included to maintain the safety and free flow of trunk road traffic.</p> <p>In an e-mail on 13.05.13 the Welsh Government (Transport) indicated that they were content with the submitted Transport Implementation Strategy and Green travel Plan.</p>		
<p>Property Section: No formal response received.</p>		

Table 1 – Request for Further Information

<p>Minerals and Waste Officer: Have raised an objection to the proposal based on the information submitted to date, as the proposal would sterilise the sand and gravel resource on the site.</p>	<p>In response to the North Wales Minerals and Waste Planning department's comments, clarification is sought as to the likely extent of sand and gravel deposits at the Penrhos site. The information provided should include an assessment of the significance of the potential sterilisation of the resource as a result of the development and any avoidance or mitigation measures that are to be implemented.</p>	
<p>Welsh Language Society: Object to the proposal on the following grounds: The Welsh Language Society is against the above application because of Anglesey's vulnerable linguistic nature which was evident in the 2011 Census, to permit an application of this type would be detrimental to the Welsh language and the application is premature as there are no firm plans in place for Wylfa B.</p>	<p>To be addressed and mitigated in the amended Welsh Language Assessment.</p>	
<p>Rural Housing Enabler: The residential development proposal should not be considered in isolation with from the workers / holiday provision.</p>		
<p>Affordable Housing Adviser Following the last meeting on 08.0313 whereupon it was indicated that 50% of houses would be</p>		<p>Clarification required on the affordable housing</p>

Table 1 – Request for Further Information

<p>affordable it was understood that the scheme was supported.</p> <p>HOW Schedule of Additional Environmental Information states (Section 20. JPPU Affordable Housing and Viability) states:</p> <ul style="list-style-type: none"> - Provide worksheets for Option 3 i.e. 10% affordable housing provision. 		position.
<p>British Gas Transco: No formal response received.</p>		
<p>CADW: Have provided comments on the application on aspects which fall within CADW's remit as a consultee on planning applications which is the impact of development on scheduled monuments or registered Historic Landscapes, Gardens and Parks.</p>		
<p>Coastal Footpaths Officer: A section of coastal footpath encircles the site at Penrhos Coastal Park. We are keen that the coastal Path is unaffected by the development and that the route would be kept available whilst any works progress, should the application be approved. I would advise the applicant to work in conjunction with the Coastal Path Team and that consultation is continued as the application progresses.</p>		
<p>Sustrans: The acknowledgement of the National Cycle Network routes and other walking and cycling routes in the area is noted. The current coastal route around the Penrhos Headland is part of a local walking and cycle route known as Lon Las Penrhos which follows the line of the coastal path. Shared use of walking and cycling access around this route in the future should be provided so as to provide a circular walking and cycling route when linked with the current alignment of the National Cycle Network. This would provide an excellent circular route when linked in with the</p>		

Table 1 – Request for Further Information

<p>other traffic free paths that connect to the site from Holyhead and Valley. This option would also enhance the visitor opportunity and extended opportunities for disabled cycle access.</p> <p>A shared use link to Cae Glas should also be provided to enhance a mini network of routes in this area.</p> <p>Routes through Cae Glas should be opened up for cycling and pedestrian access. These links should be extended through to the Lon Towyn Capell/Lon Trefignath minor road so as to provide increased access to Treaddur Bay at the south east end and to the Plas Cybi site its links back to Holyhead, at the north east access.</p> <p>Consideration should be made to create at least one shared use walking and cycling nature trail within the education facility or nature reserve. This would enhance the visitor opportunity and also provide opportunities for disabled cycle access and education.</p> <p>The Kingsland development must be designed to the guidance provided in the National Planning Policy Framework and the Design Manual for Streets and be fully permeable for pedestrians and cyclists. Local walking and cycling network should be provided as part of this development as well as proposals that may arise from the above. Pedestrian cycle access should be provided at the football ground/leisure centre connection to MILL Road.</p> <p>Sustrans believe that the inclusion of the above will assist in the development of walking and cycling network for this part of the Island which will be a benefit to the local communities and visitors to the area.</p>		
<p>Sports Council for Wales: Require confirmation that the new facilities to replace the existing football and cricket pitch are of the</p>		

Table 1 – Request for Further Information

<p>same size as the existing pitches therefore providing the same opportunities for training and matches.</p>		
<p>Welsh Water:</p> <p>Sewerage Have explained that the development will overload the existing public sewerage system. No improvements are planned within Welsh Water’s capital investment programme. We consider any development prior to improvements being undertaken to be premature and therefore object to the development. The reason for the objection is to prevent hydraulic overloading of the public sewerage system, to protect the health and safety of existing residents and ensure no detriment to the environment.</p> <p>During the discussions with the applicant’s consultants two options were outlined:</p> <ul style="list-style-type: none"> - Connection to the existing network adjacent to the sites subject to upgrading of the existing network. - Direct connection to the Waste Water Treatment Works via a terminal pumping station. <p>To progress either option a hydraulic modelling assessment will need to be undertaken.</p> <p>We understand that this proposal is an outline application submitted to establish the premise of the development and should you be minded to grant planning consent for the above development without this work having been completed two conditions are suggested, in addition to other drainage conditions.</p> <p>Additionally unrecorded public sewers and lateral drains may</p>		

Table 1 – Request for Further Information

<p>cross the Penrhos site, a 300mm public sewer crosses the Cae Glas site and no part of the building should be within 5 meters of the centreline of this public sewer.</p> <p>The proposed development is in an area where there are Welsh Water's supply problems for which no improvements are planned within Welsh Water's current Capital Investment Programme amp 5 (2010-2015). Any increased demand will exacerbate the situation and adversely affect the service to existing customers. Welsh Water therefore object to the development. It may be possible for the developer to fund the accelerated provision of essential improvements by way of a formal requisition under section 40-41 of the Water Industry Act 1991. A hydraulic assessment is required in the first instance.</p> <p>If the local planning authority are minded to grant planning permission without the work having been carried out a condition is recommended.</p> <p>All three sites are also crossed by water distribution mains and no development will be permitted within the specified distances of the centrelines of these apparatus.</p> <p>In terms of sewer treatment Welsh Water indicate that no problems are envisaged with the Waste Water treatment of domestic charges from the site, however, if a new terminal pumping station is required a feasibility of the works will need to be undertaken.</p>		
<p>Other Matters</p>		
<p>Penrhos Parameter Plan – Advanced Planting (PL1114.9.PP102 rev A) the area hatched and denoted "Retained Significant</p>		<p>Plans should be amended so that they accord with</p>

Table 1 – Request for Further Information

<p>Vegetation” includes areas which are shown on the Penrhos Parameter Plan – Land Use (PL1114.P.PP101 rev A) as Grey coloured “Development Area”</p>		<p>each other.</p>
<p>Observations Received following Publicity</p> <p>Objections</p> <p>A local petition signed by 1200, a WAG petition signed by 837 and e-petition signed by 783 have been received objecting to the planning application. The e-petition is made to stop the development of Penrhos nature reserve (coastal park) and the site should instead be acquired and managed for the community and designated a National Nature Reserve with a long term vision which involves the whole community. The WAG petition urges the Welsh Government to designate Penrhos as a National Nature Reserve for the reasons listed. Individual comments have also been left by individual signatories who have been listed in the objections below. 96 letters of objection received. The ground of objection in the submissions received are as follows (Reference numbers listed are related to paragraphs of Planning Policy Wales):</p> <ul style="list-style-type: none"> - All trees in Penrhos are over 200 years old and have Tree Preservation Orders (TPO’s, the building of lodges will destroy many of these trees. - Paragraph 5.2.9 Trees, woodland and hedgerows are of great importance both as wildlife habitats and in terms of their contribution to landscape character and beauty. Local Planning Authorities should seek to protect and areas of woodland where they have natural heritage value or contribute to the character or amenity of a particular locality. Semi-natural woodlands are irreplaceable habitats of high biodiversity value which should be protected development that would result in significant damage. - When compared to the rest of Wales Anglesey has few 		

Table 1 – Request for Further Information

<ul style="list-style-type: none"> - forests. - The Welsh Recreation Outdoor Survey 2008 indicated that the top ten activities are walking, sightseeing, wildlife watching, playing with children, picnicking, informal games, swimming outdoors, running, cycling and mountain biking. The top two places were parks and woodlands. With health and wellbeing. 48.5% of householders in Morawelon have no cars, Penrhos is in walking distance and is free local amenity and should remain so. - CCW's Accessible Natural Green Space standards recommends that no person should live less than 300m from their nearest natural area of green space and provision should be made for at least 2ha of green space per 1000 population. The loss of 89ha will mean that this area is not available. - Penrhos is tourist attraction for people all over Britain, attracts 100, 000 tourists a year. - Visitors TO Penrhos use local facilities' and the loss will impact on these businesses. Traffic on the roundabout on the A5. This could also affect migrating birds. - There are Tree Preservation Orders on Penrhos which are designed to protect trees. Half of Holy Islands woodland is also on Penrhos. - There are 200 year old trees on the Penrhos site. - All three sites are within the coastal AONB. - There are a wide range of protected plants and species in the woodland of Penrhos including bats, badgers). - Impact on wild flowers. - Beddymnach and Cymyran Sites of Special Scientific Interest (SSSI) would be detrimentally affected. - Loss of public access to important woodlands within the AONB. - The application conflicts with the Anglesey AONB Management Plan. - Schools, cyclists, bird watchers and running clubs use 		
--	--	--

Table 1 – Request for Further Information

<ul style="list-style-type: none"> - Penrhos & well as locals. - Penrhos was originally made into a nature reserve as a buffer for the Anglesey Aluminium Site. - Development of the land will curtail public access. - There is a football and cricket pitch on the Penrhos site. - No need for further holiday homes/chalets. - Penrhos Nature Reserve should remain a coastal park/reserve. - At risk of losing a unique feature in Penrhos. - Adverse effect on the Morawelon community since the facility is close to a deprived area where many do not have a car. - Historical impact. - Impact on future generations. - Scale and visual impact of the proposed development is unacceptable. - Public money via various environmental initiatives have been spent in Penrhos over the years. - There are holiday parks, hotels and B&B's on the Island which are already struggling and scrambling for business. - Quality & quantity of the jobs offered by the development questioned. - Do the employment opportunities justify the loss of Penrhos? - Holiday complexes such as that proposed are self-contained and there are limited spin –off opportunities for the local economy. - This sort of development does not create employment but instead divert it away from existing business. - Proposals will bring more people to the dole queue. - "Horizon" have confirmed in writing that they have had no discussions with Land & Lakes regarding the accommodation of nuclear workers. - Workers in connection with "Wylfa B" should be housed in existing accommodation. - Water sports not possible due to low tide clearing the 		
---	--	--

Table 1 – Request for Further Information

<ul style="list-style-type: none"> - whole beach and the rocks that are present. - Impact of water sports on wild fowl and the SSSI. - A brownfield site closer to Amlwch should be used in connection with the proposed development. - Crime & disorder issues mean that the development will need to be "caged in". - Housing development in Kingsland is too big and will overload services. - The country park 500 lodges will effectively end Holyhead town centre because of its location on the outskirts with all supermarkets and shops also present. - Ecological survey of Penrhos and Cae Glas required. It is being inferred in the press that the planning decision is a done deal. - Negative impact on the Welsh Language, local history and Welsh culture. - Traffic through Valley. - There are alternative uses and ways of managing the Penrhos site and buildings for the benefit of the community. - Contended that the Penrhos site was given to the people of Holyhead as a nature reserve in 1972. - Landscape Impact - Area is currently beautiful and unspoilt; the lodge development will spoil this. - Land and lakes will extinguish a footpath/right of way which would be detrimental to the people who have used it for the last 60/70 years. - Land & Lakes should instead develop the Anglesey Aluminium site which comprises brownfield land. - CPRW support the sub-division of leisure units to accommodate up to 2000 workers but not on the Cae Glas site. - CPRW objects on the basis that all three sites are within the AONB, overdevelopment, distance of car parks from the holiday units and the quality of the prospective development is questioned. 		<ul style="list-style-type: none"> - Applicants to respond on why this previously developed site cannot accommodate the proposed development.
--	--	--

Table 1 – Request for Further Information

<ul style="list-style-type: none"> - Proposals do not comply with planning policies. - Penrhos is valuable in terms of cultural, visual and sensory qualities. - Development will breach the Wildlife and Countryside Act. - Effect on local services such as sewage, schools and hospitals. - The writers property (Felin Heli) is the only privately owned house on Cae Glas and the writer is concerned that they could be affected financially and by means of public disruption. Writers state that the development should not affect their amenities; right of way arrangements are queried. - Cae Glas should be protected from poachers. - Urban sprawl between Treaddur Bay and Holyhead. - Development is in a green belt. - Development tantamount to a new town. - Proposals are unimaginative showing no regional individuality. - Infrastructure both socially and practically does not exist to support such a large influx of people. - Congestion at the A55. - The number of new dwellings proposed at Kingsland will mean that it will be difficult for the local community to absorb the influx of newcomers. Can a legal agreement ensure that the dwellings are sold to local people? - Why can't the Penrhos development be built on previously developed land? - Cae Glas contains a landfill site with dangerous substances present; can it be developed should it be tested first? - Are Anglesey Aluminium in breach of their original planning consent, in that they were supposed to re-instate the land & remove contaminants? - Extent to which the development spreads to the old road to Treaddur Bay around the inland sea area, close to SSSI's and heritage site of the burial chamber. 		<ul style="list-style-type: none"> - An updated red line plan should be submitted removing Felin Heli from the application site and confirmation provided as regard the right of way referred to in the representation.
--	--	--

Table 1 – Request for Further Information

<ul style="list-style-type: none"> - What guarantee is there that local people will be used in the construction? - Scaled down version located elsewhere in Anglesey would be more appropriate. - Who can afford the houses in Kingsland? - Visitors will not leave the leisure village at Penrhos; there will be no benefit to the town centre. - Developers do not state whether the Cae Glas nature reserve will be free of charge. - What does the community access programme to the leisure village mean? - Why not use Holyhead itself as a leisure village? - Long terms safety and general road traffic issues in connection with the use of Cae Glas as a park and ride facility. - Safety, security and social issues of housing so many construction workers in the proposed camp, effect on the amenities of adjacent residents. - One writer with a property (The Foundary) adjacent to the Old (A5) expresses concerns as regards the prospects of the volume of traffic and associated noise and dangers as a result of the housing of construction workers and the holiday development. - Trees cut and replaced by saplings is not mitigation. - Study commissioned by the council to look at the AONB boundary adjacent to the Anglesey Aluminium site. - Red squirrels would be disturbed in Cae Glas. - Disruption, noise and vibration to Penrhos in the course of construction & the effects on wildlife. - Concern that the Inland Sea will be used for motorsports. - Impact on the wilderness habitat at Cae Glas. - Loss of quality farmland/agricultural land. - The proposals conflict with policy 53 of the Ynys Mon local Plan, A6 of the Gwynedd Structure Plan and the Wildlife and Countryside Act. - Monstrous development will bring traffic and pollution to 		<ul style="list-style-type: none"> - In accord with paragraph 4.10.1 PPW applicant to
---	--	--

Table 1 – Request for Further Information

<ul style="list-style-type: none"> - the area. - Not sustainable to put construction workers so far from the Wylfa site. - The development of Penrhos would lead to a loss of a facility for disabled tourists. - Social, historical impact on the features of the Stanley Estate. - Queried whether Centre Parks is a valid comparison for the economic report submitted. - Extent of the development at Penrhos. - Leisure facility for the people of Holyhead. - Not the development that is being objected to but the location in Penrhos. - A number of writers describe their memories or experiences of Penrhos and object on the basis that the development will stop the activities/experiences in future. - Path in Penrhos afford disabled, push chairs and others the chance to go for walks. - Big development and Anglesey don't mix, marina development is unsold, they are banking on Wylfa B, and the Penrhos site will eventually be left empty. - Feelings of the community should be noted. - Financial motivation/private gain should not be decisive. - Ken Williams MBE set up the reserve. - Motivations and repute of the Isle of Anglesey Council questioned. - Poor architecture planned in the development. - Impacts on the historical features on Penrhos such as Tre Gof, the Bullfield, Betting Stand and the Old Pleasure Garden. - Should be National Trust land. <p>One letter is a copy of that sent to the Welsh Government requesting that they "call in" the planning application as a departure from national planning policies in Planning Policy Wales and other points listed , as follows:</p>	<ul style="list-style-type: none"> - Applicant to address paragraph 3.9 TAN 18. 	<p>respond.</p>
--	--	-----------------

Table 1 – Request for Further Information

<ul style="list-style-type: none"> - 2.1.1 – A Plan led system The UDP and stopped LDP not adopted so therefore not within the local development Plan. The interim policy is based on a five year housing supply; the land supply for the area 2011 based on the Joint land availability which states we have 5.1% availability remaining for housing. The JLDP due to be adopted in 2016 has enough candidate site areas to exceed the five year housing supply and thus cushioning the significant effects that large sites would make on the community. - 2.1.7 – LDP’s and public certainty Re: The un-adopted UDP and stopped LDP. Misguided locals have already invested in the sites on the areas concerned, in the knowledge that in the worst case scenario, according to the un-adopted UDP, the land, would only be used for leisure purposes (Re: FF6- UDP) for the benefit and enjoyment of the local community. - 2.4.5 – Strategic environmental assessment The Land and lakes survey does not reasonably take into account the severity of the impact that this development will have in this sensitive environment. It is not supported by the CCW. - 2.6.3 – Prematurity of L.D.P. Full consideration has not being given for this new site together with the interim policy; this is reflected in the statements which I have already made. - 3.1.4 – Material considerations for the site. The size of the site will no doubt have an effect on the demographics of the island. The people housed there will also need jobs this may disadvantage the locals. The amount of vehicles will increase dramatically affecting already crowded roads. The flow of traffic to and from the sites will increase causing funnelling and impendance for cyclists and danger to road users. - The immigration of foreign people without national driving 		
--	--	--

Table 1 – Request for Further Information

<ul style="list-style-type: none"> - skills. - The effect on wildlife. - The loss of enjoyment for local uses of the sites. - The effect on biodiversity. - The effect of colonisation. - Places of worship - The vetting of criminals paedophiles, rapists, drug users etc. - Effect on local amenities etc. - Green belt considerations. - 4.10 – Conserving the best and most versatile agricultural land. There is no mention of the conservation of any of the agricultural land on this development, farm work and life styles will be affected. - 4.13.1 Supporting the Welsh language; no realistic consideration given towards the demographics or enhancement of the Welsh language. - 4.13.2 Welsh communities - Although the application states that only 10% of the residential housing will be affordable housing (again a departure from policy) there is no statement to say these will be for the indigenous population. - 5.5.6 – AONB’s special considerations Major developments should not take place in national parks or AONB when there are plenty of other more suitable and sustainable locations on Ynys Mon for large site developments to facilitate Wylfa contractors. - 7.6.5 – Agricultural development proposals agricultural land lost due to housing development - 9.3.4 – Significant residential development, the design of the houses is not sympathetic to the surrounding AONB, there are too many concentrated in one area with not enough proposed screening. - Flooding, the Kingsland site regularly floods. - Purpose of the AONB is to conserve and enhance the landscape meeting the needs for the quiet enjoyment of 		
---	--	--

Table 1 – Request for Further Information

<ul style="list-style-type: none"> - the countryside and having regard to those who live there. Lodges would have a detrimental impact on the AONB in Penrhos. - Paragraph 5.2.10 of PPW states planning authorities should make use of their powers to protect and plant trees to maintain and improve the appearance of the countryside and built up areas. 		
<p>Support</p> <p>25 observations received supporting the planning application on the following grounds:</p> <ul style="list-style-type: none"> - Provided that the building of Wylfa B nuclear power station is assured, CPRW support that there will be need for accommodation for many construction workers and that Holyhead is the most sensible location. - Also support residential development of Kings land subject to affordable housing requirements. Also state that all of the 360 units on this site should initially be available for Wylfa workers. - In relation to the Penrhos site CPRW do not object to some development taking place. - A number of the letters of support have been received from existing business operators within the leisure, tourism and shipping industry on Anglesey expressing support for the application on various grounds including raising the profile of Anglesey as a tourism destination, employment opportunities, no credible displacement perceived, spin –off opportunities to existing operators, increased volume in the tourist, will attract tourism from Ireland and Cruise Ships which is a priority of the Welsh Government, no existing or destination leisure all year facility on the Island, Destination Management Plan has identified the need for an improved and dynamic leisure offer to support economic growth, insufficient attractions presently available, step-change in the Anglesey tourism 		

Table 1 – Request for Further Information

<p>offer, will provide a substantial marketing budget to promote the area,</p> <ul style="list-style-type: none"> - Boost to the economy. - Benefit Anglesey and Holyhead. - Provide a hub to explore North Wales. - Well considered application taking account of various issues in a sensitive location. - Must consider the younger generation who have had joy from park and obstruct for the benefit of the community as a whole. - Young have not had the benefit of good jobs with “Stena” or the railway. - Will offer means of control for the benefit of the woodland at Penrhos. - Positive impacts Holyhead and district which has lost jobs over the years. 		
<p>Un-Categorised</p> <p>1 letters received which make observations but which cannot be categorised as supporting or objecting:</p> <ul style="list-style-type: none"> - Instead of biomass on the Anglesey Aluminium site why not a recycling centre for plastic, trees etc. has the materials could be used to construct turbines etc. - The empty Cefni Fruits building in Holyhead could be used as a bowling Alley. 		