

# Penrhos Leisure Village



## **Environmental Statement Addendum**

May 2013

**PENRHOS LEISURE VILLAGE  
LAND AND LAKES (ANGLESEY) LTD  
ENVIRONMENTAL STATEMENT ADDENDUM  
MAY 2013**

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## **NON TECHNICAL SUMMARY**

A planning application, accompanied by and Environmental Statement (ES), for a leisure village and residential development was submitted to Isle of Anglesey County Council (IOACC) in November 2012. Following submission of the application, IOACC issued a formal request for further environmental information. This addendum contains that information following a process of further survey and assessment, a summary of which is provided in the following paragraphs.

In addition to the additional information requested, several minor design changes have been made such as reducing the area set aside for car parking at Penrhos Leisure Village, the formalisation of the Penrhos Coastal Path as a Public Right of Way and moving the access to Kingsland southwards to facilitate better visibility for drivers. It has also been confirmed that the Kingsland site will be used temporarily as nuclear workers accommodation during the construction of Wylfa New Build. These changes have all been detailed in this ES addendum and reassessed as and where appropriate.

Since the submission of the planning application, Planning Policy Wales has been updated to include a 'presumption in favour of sustainable development'. The changes to the policy have been presented in the ES addendum. No changes to the proposals have been necessary in response to this policy update.

Further information has been provided to corroborate the findings of the socioeconomics assessment. This has included additional evidence in relation to the displacement of jobs from existing tourism providers to the Leisure Village, which concludes that the offer from the proposed development is sufficiently different to result in very limited loss of jobs in other tourism ventures. Confirmation has also been provided in relation to the potential benefits to the supply chain in the local area. Furthermore, it has been confirmed that the potential jobs that would be created during construction and once operational are appropriate for the level of skill and the amount of available labour in the local area. Therefore the potential impacts on job creation remains as identified in the original ES.

An evaluation of the impact of the temporary workers and new residents at Kingsland has been undertaken and this revealed that the additional demand for leisure and community

facilities would represent a beneficial effect through the additional revenue that could be received by local businesses.

Additional clarification was requested in relation to the impacts upon Welsh language and an update to this assessment has been provided. However, the conclusion of the ES remain unchanged in that a positive impact is anticipated in relation to providing jobs and homes that will enable the local Welsh-speaking community to stay together.

Further information has also been requested in relation to the landscape and visual impact assessment. In this instance, the potential impacts of some viewpoints have been re-evaluated in light of comments received from IOACC and CCW. This has resulted in some of the impacts on views being reclassified as worse than previously stated but the majority remain as previously identified. Further evaluation of the cumulative effects of the development in conjunction with other development in the surrounding area has also been undertaken. This has concluded that only a limited number of sensitive viewpoints would be affected by more than one development and that even these would only be exposed to a slightly worse visual impact.

In terms of ecology, several points were raised by the IOACC ecologist, notably in relation to potential impacts on brown hare and lichen. No further surveys for brown hare have been undertaken although confirmation that the habitat is of limited suitability for the species has been confirmed. A lichen survey was undertaken and the results presented in this addendum. The survey confirmed that lichen were of very high quality in the proposed nature reserve, where they will be retained and protected. Woodland lichen were found to be of limited quality and would benefit from the proposed woodland works at Penrhos, which would allow more light to penetrate the woodland areas.

A biodiversity method statement has been produced, that seeks to clarify the approaches that would be taken to avoiding harm to wildlife during the construction stage. With these measures in place, the impacts on protected species can be adequately controlled and avoided in line with the information provided in the ES.

Clarification was sought by CCW in respect of potential impacts on the Holy Island Coast Special Area of Conservation (SAC). Additional information has been provided that

confirms that no significant impact would arise as a result of guests of the leisure centre visiting the SAC.

In relation to the effects on woodland, an Arboricultural Impact Assessment and an Arboricultural Method Statement have been produced. These reports identify how the development will minimise the construction impacts on trees and will help to improve the condition and longevity of woodland in the long term through appropriate management.

IOACC has requested clarification on a number of points related to listed buildings and heritage. Accordingly, a Heritage Management Statement has been included within the ES Addendum which more clearly defined the Listed buildings on the site and sets out the means by which they will be conserved as part of the proposals. This information does not affect the conclusions presented in the original ES.

Additional information in relation to minerals was requested by the North Wales Minerals and Waste Planning Service because there are potential sand and gravel deposits at the site. Accordingly, a study into the potential for mineral resources to be present at the site has been undertaken. It has been demonstrated that the quality and quantity of the mineral resource is low due to historic exploitation of the minerals. When considered against the target volumes for mineral extraction of sand and gravel in Anglesey and Gwynedd, the entire potential resource at the site represents less than 1% of the target. Therefore the impact of the development on mineral reserves is considered to be negligible to minor adverse at worst.

Several points of clarification were requested in relation to transport and access. This clarification has been provided but does not affect the information or assessment presented in the original ES.

In relation to noise, further information has been submitted in relation to the potential impacts of noise from Holyhead Leisure Centre on residents at Kingsland, noise from the ALPOCO plant to the north of Cae Glas and the noise generating activities at the Anglesey Aluminium Metals core site. This additional information supports the findings presented in the original ES and there are no changes to the conclusions and impacts previously stated.

No further information was requested or has been submitted in relation to drainage and flood risk, air quality, waste, lighting, utilities and sustainability. Therefore the conclusions of these studies remain as stated in the original ES.

## 1. INTRODUCTION

1.1 An outline planning application (Ref. 46C427K/TR/EIA/ECON), which was accompanied by an Environmental Statement, was validated by Isle of Anglesey County Council (IOACC) on 28<sup>th</sup> November 2012. The application proposes:

*An outline planning application, with all matters reserved except for means of access, proposing:*

### Land at Penrhos

*A high quality 'Destination' leisure village at Penrhos Coastal Park, London Road, Holyhead (Grid Ref SH 27044 81504) comprising:*

- *up to 500 new leisure units including new lodges, cottages and conversion of the existing Estate buildings;*
- *Central new hub building comprising Reception with extensive leisure facilities including indoor sub-tropical water park, ten pin bowling and indoor sports hall, (up to 4,350 sq m) and cafes, bars, restaurants and retail (up to 650 sq m);*
- *Refurbishment and extension of key estate buildings to provide:- Central Farmer's Market, indoor children's play area, cycle and sports hire centre, Luxury Spa with gymnasium and changing facilities (up to 950 sq m), the Boathouse ruins for new café and watersports centre (190 sq m) and the Bathing House to become a new Beachside restaurant (340 sq m);*
- *Providing and maintaining 29 hectares of publicly accessible areas with public car parking and enhancements to the Coastal Path. Including:*
  - *Managed walkways within 15 hectares of woodland, the retention and enhancement of Grace's pond, Lily Pond, Scout's pond with viewing platforms, the Pet Cemetery, War Memorial, the Pump House and picnic area with bird feeding stations and hides with educational and bilingual interpretation signage created throughout;*
  - *Creation of a new woodland sculpture trail and boardwalks and enhanced connection to the Coastal Path;*

- *The beach will continue to be accessible to the public providing safe access to the shallow shelving water; and*
- *A Combined Heat and Power Centre (up to 500 sq m).*

#### Land at Cae Glas

*The erection of leisure village accommodation and facilities which could be used initially as a temporary construction workers accommodation complex for Wylfa B at land at Cae Glas, Parc Cybi, Holyhead (Grid Ref SH 26487 80310) comprising:*

- *Up to 315 lodges to be initially sub-divided to accommodate up to 2,000 construction workers;*
- *Central hub building providing reception and canteen (up to 2,000 sq m) ancillary to accommodation;*
- *A Park and Ride facility comprising up to 700 car parking spaces;*
- *A new hotel (up to 75 bedrooms);*
- *A lakeside hub comprising restaurant, café, retail and bar (up to 300 sq m);*
- *New grass football pitch and cricket pitch; and*
- *A Combined Heat and Power Centre (up to 300 sq m).*

*To be subsequently converted (post Wylfa B construction) into a high quality extension to the Penrhos Coastal Park Leisure Village comprising:*

- *Refurbished lodges and facility buildings to create high quality holiday accommodation (up to 315 family lodges);*
- *A Visitor Centre (up to 750 sq m) and Nature Reserve allowing controlled public access; and*
- *Heritage Centre with visitor parking.*

#### Land at Kingsland

*A high quality residential development comprising up to 360 residential dwellings set in high quality landscaping and open spaces at land at Kingsland, Kingsland Road, Holyhead (Grid Ref SH 24768 80686).*

*Each phase of development will have ancillary development comprising car parking, servicing areas, open spaces and plant.*

- 1.2 Further to the submission of the application, discussions have been held with IOACC officers and a range of formal responses have been received from consultees to the application. This process has resulted in some minor amendments to the proposed layout being made and some additional assessment information being required to satisfy the requirements of various stakeholders and consultees.
- 1.3 The amended development is reflected in the new description of the development, which is presented on the planning forms as follows:

**A hybrid planning application proposing:**

**Outline with all matters reserved except for means of access, for:**

*A leisure village at Penrhos Coastal Park, London Road, Holyhead comprising:*

- *up to 500 new leisure units including new lodges and cottages;*
- *Central new hub building comprising reception with leisure facilities including indoor sub-tropical water park, ten pin bowling and indoor sports hall, and cafes, bars, restaurants and retail;*
- *Central new Farmer's Market building;*
- *Central new spa and leisure building;*
- *A new café and watersports centre at the site of the former Boathouse;*
- *Demolition of the Bathing House and the construction of a restaurant at its former location;*
- *Demolition of other existing buildings including three agricultural barns and three residential dwellings;*
- *Providing and maintaining 29 hectares of publicly accessible areas with public car parking and enhancements to the Coastal Path, including:*
  - *Managed walkways within 15 hectares of woodland, the retention and enhancement of Grace's pond, Lily Pond, Scout's pond with viewing platforms, the Pet Cemetery, War Memorial, the Pump House and*

*picnic area with bird feeding stations and hides with educational and bilingual interpretation signage created throughout;*

- *Creation of a new woodland sculpture trail and boardwalks and enhanced connection to the Coastal Path;*
- *The beach will continue to be accessible to the public providing safe access to the shallow shelving water;*
- *A Combined Heat and Power Centre*

#### *Land at Cae Glas*

*The erection of leisure village accommodation and facilities which have been designed to be used initially as a temporary construction workers accommodation complex for Wylfa B at land at Cae Glas, Parc Cybi, Holyhead comprising:*

- *Up to 315 lodges will be initially sub divided for nuclear workers accommodation;*
- *Central hub building providing reception and canteen ancillary to accommodation;*
- *A Park and Ride facility comprising up to 700 car parking spaces;*
- *A new hotel;*
- *A lakeside hub comprising restaurant, café, retail and bar;*
- *New grass football pitch and cricket pitch; and*
- *A Combined Heat and Power Centre.*

*To be subsequently converted (post Wylfa B construction) into an extension to the Penrhos Coastal Park Leisure Village comprising:*

- *Refurbished lodges and facility buildings to create high quality holiday accommodation (up to 315 family lodges);*
- *A Visitor Centre and Nature Reserve allowing controlled public access; and*
- *Heritage Centre with visitor parking.*

#### *Land at Kingsland*

*The erection of a residential development which has been designed to be used initially as temporary construction workers accommodation at land at Kingsland, Kingsland Road, Holyhead comprising:*

- *Up to 360 new houses to be initially used as temporary construction workers accommodation.*

*To be subsequently converted (post Wylfa B construction) into a residential development comprising:*

- *Up to 360 residential dwellings set in high quality landscaping and open spaces.*

*Each phase of development will have ancillary development comprising car parking, servicing areas, open spaces and plant.*

***Full detail for the change of use of the existing Estate buildings at Penrhos Coastal Park, London Road, Holyhead including the change of use for:***

- *The Bailiffs Tower and outbuildings at Penrhos Home Farm from a cricket clubhouse to a visitors information centre, restaurant, café, bars and retail;*
- *Home Farm Barn and Cart Buildings from farm buildings to cycle and sports hire centre;*
- *The Tower from residential to a Managers accommodation and ancillary office; and*
- *Beddmanarch House from residential to a visitors centre.*

1.4 This Addendum represents a supplementary report to the Environmental Statement and should be read in conjunction with the original document. It revisits, where required, those parts of the technical assessments that have been superseded as a result of the minor revisions to the scheme.

## **2. APPROACH**

2.1 This Addendum is submitted under Regulation 19 'Further information and evidence respecting Environmental Statements' of the Town and Country Planning

(Environmental Impact Assessment) Regulations 1999 (SI 293/1999). The requirement for the submission of additional information was requested in a letter from IOACC dated 31 May 2013. A copy of this letter is included at Appendix A.

- 2.2 Following the submission of the planning application in November 2012 and after consultation with IOACC, statutory consultees and a wide range of stakeholders, some minor design amendments were made to the scheme and some additional survey and study work was undertaken. Where additional survey or assessment work has been undertaken, the approach to these works is specified in the relevant sections of this ES Addendum.
- 2.3 The revised development has been subject to a scoping exercise to confirm that the assessments undertaken as part of the EIA sufficiently evaluate all potential environmental effects. For the majority of the assessments no further work has been required in this regard because effects are not related to the proposed occupancy by workers or residents but to the effects of built development, which remains almost entirely unchanged. The transport assessment is based upon the 'worse case' traffic scenario of Kingsland as a residential development and Cae Glas as a leisure development, as are the traffic-related air quality and noise assessments; therefore, no additional assessment is required for these elements. Additional assessment has been required in relation to socioeconomics, regeneration and health and this information is included in Section 8 of this Addendum.
- 2.4 The sections of this report are numbered in accordance with the chapter numbers of the original ES for ease of reference.
- 2.5 Plans that were presented in the original ES but which have been subject to change have been included towards the end of this ES Addendum. The original numbering has been retained for ease of reference, but with the suffix 'a' added to distinguish between versions.

### **3. THE SITE**

- 3.1 The site boundary has been subject to a minor change since the submission of the application. The site now excludes an area of third party land adjacent to the Inland Sea. This amendment results in the total site area for Cae Glas being approximately 108.3 ha, which is slightly reduced from the 109 ha referenced in the ES. This means that the total application site area is approximately 206.8 ha.
- 3.2 Since the submission of the application there have been no changes to the prevailing uses of the site. Therefore, the baseline conditions on the site since remain consistent with those described in the documents submitted with the planning application in November 2012.

### **4. ALTERNATIVES AND DESIGN EVOLUTION**

- 4.1 The majority of additional information required as part of the Regulation 19 Request from IOACC takes the form of additional analysis rather than design changes. However, some comments received in response to the application have led to limited further refinement of the masterplan, primarily in relation to repositioning of the Kingsland access in response to County Highways comments. This and other minor changes that have been made are described in the following section of this report.
- 4.2 In response to the application, IOACC has requested that the AAM core site to the west of the Penrhos site is considered as an alternative site for the development. 6.52 AAM's Core Site is located to the west of Penrhos between the A55 to the south, the A5 London Road to the north and Penrhos Retail Park to the east. The northern portion of the site is situated within the AONB and therefore any redevelopment of this portion of the land would also have to address the policy tests of PPW5 paragraph 5.5.6.
- 4.3 The AAM Core Site is not a realistic alternative site which could accommodate the development. The principal reason being that the site is not available for development. The site will be redeveloped as part of a Biomass fuelled Power Station which was granted consent under s36 of the Electricity Act 1989 in

September 2011 (Application ref. 12.04.09/19C). Lateral Power is the chosen preferred bidder to deliver the development and as a result the site is not available to Land and Lakes.

- 4.4 In addition, the AAM Core Site would only be able to accommodate the proposed development at Penrhos with the land at Cae Glas and Kingsland still being required for development of the remaining components.

## **5. THE PROPOSED DEVELOPMENT**

- 5.1 This section describes the revisions to the proposals that are of relevance to the EIA have been made since the submission of the application. These are described in relation to the three development parcels: Penrhos, Cae Glas and Kingsland.

### **Penrhos**

- 5.2 At Penrhos, the southern car park has been reduced in area to minimise the loss of trees from the woodland block. This results in fewer trees being retained within the car parking area but greater retention of the woodland block as a whole. In addition, a parking area adjacent to the A5 has been removed to retain a buffer to the highway.
- 5.3 The number of lodges to the east of the hub has been amended to reduce tree loss in an area considered to have high woodland value. Lodges removed from this area have been relocated to the west of the hub.
- 5.4 In the area closest to the Coastal Path at the Penrhos headland an additional row of single storey lodges have been included in order to minimise visual impacts. Some additional mounding and tree planting has also been proposed on the Penrhos headland in response to comments received from IOACC.
- 5.5 The changes described above can be seen on the illustrative Penrhos masterplan at Figure 5.1a and the land use, building heights and landscaping parameters plans at Figures 5.4a, 5.7a and 5.13a.

- 5.6 In the revised proposals, Beddmanarch House, which was previously proposed to be retained in its current form, will become a visitor's centre for the Coastal Park. This will entail no amendments to the building fabric, rather refurbishment of the interior.
- 5.7 The buildings proposed for retention are now subject to a change of use application, which is supported by a structural survey report. Although there is a procedural change to the application, the proposals for the conversion of buildings remain unchanged.
- 5.8 The Anglesey Coastal Path around the perimeter of the Penrhos site, which currently has permissive access granted to the public by AAM as the landowner, is to be offered as a Public Right of Way (PROW) as part of the revised proposals. Land & Lakes will continue to maintain the new PROW as part of the ongoing maintenance of the scheme.

### **Cae Glas**

- 5.9 The proposals on this site remain unchanged. However, the wording of the application in respect of this part of the site has been slightly amended to provide greater certainty over the temporary use of the site for nuclear workers accommodation.
- 5.10 As described in Section 3 of this report, Cae Glas has also been subject to a minor boundary change that has resulted in 0.7ha being removed from the site. This has resulted in no change to the proposals as this area was proposed for retention in its existing state.
- 5.11 Despite there being no changes to the proposals, the Cae Glas building heights parameter plan has been amended slightly to correct a discrepancy with the specified height of the cricket pavilion. This has seen a reduction in the maximum height of the built form shown from 8m to 5m. The land use and advanced planting parameters plans have also been revised to reflect the red and blue site boundary lines but the content of these plans remains as previously submitted.

- 5.12 Clarification has also been sought in relation to the size and management of the replacement cricket and football pitches. The pitches are of at least equal size to those being replaced. The football pitch is suitable for use as one full sized pitch or two 5-a-side pitches. The cricket pitch would be run by the local cricket club and would be a privately operated and maintained facility. General public use would not be permitted, much the same as for the existing pitch.
- 5.13 Additional clarification has also been sought in relation to dogs being prohibited in the Cae Glas Nature Reserve and the means by which they would be excluded. The Nature Reserve will be a controlled access facility, with boundary treatments as defined in the Design and Access Statement and a single access point near to the proposed visitors centre.

### **Kingsland**

- 5.14 As a result of consultation with IOACC officers and further analysis of visibility splays from the junction, the access to Kingsland has been repositioned approximately 18m to the south of its previous position. This is illustrated on Figure 5.18a. The form and functionality of the access otherwise remains the same.
- 5.15 As a result of the change to the access arrangements, the masterplan has been amended to position dwellings around the access and to deliver an appropriate illustrative road layout. These amends do not affect the parameters plans and the detail of what is being applied for.
- 5.16 The properties at Kingsland are to be made temporarily available for up to 1,500 nuclear workers during the construction of the new nuclear power station at Wylfa. Units will be brought forward as houses in multiple occupation and be subdivided to accommodate 3-5 construction workers per property. The rooms will be fully serviced to provide a cleaning and laundry service but there will be no kitchens provided. These units would be converted into typical family accommodation once the occupation by nuclear workers has ceased.

- 5.17 Land and Lakes is proposing that once the temporary use of the units at Kingsland for construction workers accommodation has ceased, 50% of the units to be converted into residential dwellings will be affordable.
- 5.18 The change in the proposed use of the properties at Kingsland does not affect the layout or exterior appearance of the buildings or site. However, the properties will in the first instance may be built with an internal configuration appropriate for multiple occupation or for use by smaller numbers of workers in a traditional housing configuration. These units will only be used by workers and families will not be housed on the site during the Wylfa construction period.
- 5.19 Workers that reside at Kingsland during the nuclear new build programme will make use of the registration, recreation and dining facilities at Cae Glas. In order to support the linkages between Cae Glas and Kingsland, workers will be provided with a shuttle bus service between the sites or will be free to walk the short distance between the sites.
- 5.20 These changes to the scheme are reflected on the updated masterplans and EIA parameters plans presented at the rear of this report.
- 5.21 Finally, it is confirmed that the development at Kingsland will be designed to comply with Secured by Design standards.

## **6. CONSTRUCTION**

- 6.1 The construction programme is planned to commence in 2014, as stated in the ES. However, due to the changes to the arrangements for Kingsland and the anticipated timescales for the delivery of the New Wylfa project, the timescales anticipated are now as set out below.

### **Penrhos**

- 6.2 Advanced planting on headland is likely to take place in 2014/2015, with lodge and central facilities development taking place between approximately 2015 and

2018. It is anticipated that the development will be partially operational from 2016.

### **Cae Glas**

- 6.3 It is proposed that the advanced planting, bunding to the A55 and creation of the cricket pitch will take place in 2015, with the overall lodge and facilities construction taking place between 2017 and 2019. It is likely that Cae Glas will be used for nuclear workers accommodation for 6-10 years from 2017 onwards, although the start date depends on the progress of the Wylfa planning and development process. Refurbishment of lodges would commence following the use as worker accommodation, with Leisure Village operation anticipated by 2027.

### **Kingsland**

- 6.4 Advanced planting is anticipated in 2016 before construction begins in 2017. Workers would begin to occupy the site during the construction period once units are completed, likely to be from 2018 onwards. Houses would be refurbished following worker occupation between with houses being available by 2027 – 2029.
- 6.5 As stated in Section 5, some of the properties at Kingsland would, in the first instance, be built with an internal configuration appropriate for multiple occupation, with the layout reconfigured to provide typical family living accommodation once the occupation by nuclear workers has ceased. This will entail two stages of construction, the detail of which will be set out in future reserved matters applications.

## **7. PLANNING POLICY CONTEXT**

### **Planning Policy Wales**

- 7.1 Immediately prior to the submission of the outline planning application, the Welsh Government published Planning Policy Wales 5 (PPW5). This section of the ES Addendum summarises the relevant updated policies of PPW5 as they relate to the planning application.

### ***The Presumption in Favour of Sustainable Development***

7.2 Amendments, primarily to Chapters 2 and 4, introduce the “presumption in favour of sustainable development”. These changes have been made following public consultation in 2012 in order to reinforce the need for Authorities to prepare, adopt and implement the plan-led approach through Development Plans and strengthen the framework within which individual applications are determined, in order to further facilitate sustainable development.

7.3 PPW5 at paragraph 4.1.4 and Figure 4.1A sets out the definition of sustainable development in line with One Wales: One Planet (the Welsh Government’s Sustainable Development Scheme). PPW5 states:

*“In Wales, this means enhancing the economic, social and environmental well-being of people and communities, achieving a better quality of life for our own generations in ways which:*

- *Promote social justice and equality of opportunity; and*
- *Enhance the natural and cultural environment and respect its limits - using only our fair share of the earth’s resources and sustaining our cultural legacy.*

*Sustainable development is the process by which we reach the goal of sustainability<sup>1</sup>.”*

7.4 Paragraph 4.1.5 defines a series of main outcomes to deliver the vision of sustainable development as a process of development that leads in time to a Wales that is economically, socially and environmentally sustainable. These are:

- *“Sustainable resource use;*
- *Sustaining the environment;*
- *A sustainable economy;*
- *A sustainable society; and*
- *The well-being of Wales”<sup>2</sup>.*

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<sup>1</sup> Planning Policy for Wales, Edition 5, November 2012, page 43, Figure 4.1A

7.5 Paragraph 4.2.2 is also of relevance and states:

*"The planning system provides for a presumption in favour of sustainable development to ensure that social, economic and environmental issues are balanced and integrated, at the same time, by the decision-taker when:*

- *Preparing a Development Plan; and*
- *In taking decisions on individual planning applications<sup>3</sup>"*

7.6 Paragraph 4.2.4 relates to the application of the "presumption in favour of sustainable development" and states:

*"A plan-led approach is the most effective way to secure sustainable development through the planning system and it is important that plans are adopted and kept regularly under review. Legislation secures a presumption in favour of development in accordance with the Development Plan for the area unless material considerations indicative otherwise. Where:*

- *There is no adopted Development Plan; or*
- *The relevant Development Plan policies are considered outdated or superseded; or*
- *Where there are no relevant policies.*

*There is a presumption in favour of proposals in accordance with the key principles and key policy objectives of sustainable development in the planning system. In doing so, proposals should seek to balance and integrate those objectives to maximise sustainable development outcomes."*

7.7 Paragraph 4.2.5 states:

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<sup>2</sup> Et seq. page 44, paragraph 4.1.5

<sup>3</sup> Et seq. page 45, paragraph 4.2.2

*"In taking decisions on individual planning applications it is the responsibility of the decision-maker to judge whether this is the case using all available evidence, taking into account the key principles and key policy objectives of planning for sustainable development. In such cases the local planning authority must clearly state the reasons for the decision<sup>4</sup>".*

### **Economic Development**

7.8 Following the publication of the research paper 'Planning for Sustainable Economic Renewal' in June 2011 and associated public consultation in late 2011 / early 2012, Chapter 7 has been revised to set out the Welsh Government's updated planning policy on economic development.

7.9 Chapter 7 has been significantly revised to align planning policy on economic development more closely with the Welsh Government's broader economic policies and to ensure that that the planning system in Wales facilitates economic renewal more effectively.

7.10 Paragraph 7.1.1 of PPW5 defines economic development and states:

*"For planning purposes the Welsh Government defines economic development as development of land and buildings for activities that generate wealth, jobs and incomes. Economic land uses include the traditional employment land uses (offices, research and development, industry and warehousing), as well as uses such as retail, tourism and public services. The construction and energy sectors are also important to the economy and are sensitive to planning policies<sup>5</sup>."*

7.11 In addition, Paragraph 7.1.2 states:

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<sup>4</sup> Et seq. page 46, paragraph 4.2.5

<sup>5</sup> Et seq. page 102, paragraph 7.1.1

*"It is essential that the planning system considers, and makes provision for, the needs of the entire economy and not just those uses defined under parts B1-B8 of the Town and Country Planning Use Classes Order...<sup>6</sup>"*

7.12 Paragraph 7.1.3 confirms the role that economic development should have in the planning system and states:

*"The planning system should support economic and employment growth alongside social and environmental considerations within the context of sustainable development. To this end, the planning system, including planning policies, should aim to ensure that the growth of output and employment in Wales as a whole is not constrained by the shortage of land for economic uses. Local planning authorities should aim to facilitate the provision of sufficient land required by the market, except where there are good reasons to the contrary. In addition, wherever possible local planning authorities should seek to guide and control economic development to facilitate regeneration and promote social and environmental sustainability. In doing so, they should aim to:*

- *Co-ordinate development with infrastructure provision;*
- *Support national, regional and local economic policies and strategies;*
- *Align jobs and services with housing, wherever possible, so as to reduce the need for travel, especially by car;*
- *Promote the re-use of previously developed, vacant and underused land; and*
- *Deliver physical regeneration and employment opportunities to disadvantaged communities<sup>7</sup>"*

7.13 PPW5 introduces the importance of economic considerations of a development in the planning system. An example of the promotion of economic interests is set out in Paragraph 7.2.2 which states:

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<sup>6</sup> Et seq. page 102, paragraph 7.1.2

<sup>7</sup> Et seq. page 103, paragraph 7.1.3

*"Local Planning Authorities are required to ensure that the economic benefits associated with a proposed development are understood and that these are given equal consideration with social and environmental issues in the decision-making process, and should recognise that there will be occasions when the economic benefits will outweigh social and environmental considerations<sup>8</sup>."*

7.14 Paragraph 7.6.1 requires LPA's to adopt a positive and constructive approach to applications for economic development. In determining applications for economic land uses LPA's should take account of the likely economic benefits of the development based on robust evidence. The key factors in assessing these benefits as set out in paragraph 7.6.1 include:

- *The numbers and type of jobs expected to be created or retained on the site;*
- *Whether and how far the development will help redress economic disadvantage or support regeneration priorities, for example by enhancing employment opportunities or upgrading the environment;*
- *A consideration of the contribution to wider spatial strategies, for example for the growth or regeneration of certain areas<sup>9</sup>."*

An analysis of the development's compliance with PPW5 is presented in the Addendum Supporting Planning Statement.

## **8. SOCIOECONOMICS, REGENERATION AND HEALTH**

8.1 An update to the Need and Economic Report prepared by Regeneris is presented at Appendix B. This report includes the following key information, which has been used to review the findings and conclusions of the ES chapter:

- A more detailed assessment of potential displacement effects between the proposed development and the existing portfolio of visitor accommodation in Anglesey.

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<sup>8</sup> Et seq. page103, paragraph 7.2.2

<sup>9</sup> Et seq. page 106, paragraph 7.6.1

- More details on the nature of the jobs and supply chain opportunities that will be created, and how the applicant is proposing to ensure that these benefits are captured by local resident and local firms.
- We have also sought to provide additional information that has been requested on how the development, and in particular the visitors and workforce at the development, will impact on the well-being of the Welsh language.
- A more detailed assessment of the existing supply of social infrastructure and services, likely levels of demand on this infrastructure as a result of the Penrhos Leisure Village scheme and the need for any mitigation.

8.2 These issues have been addressed in turn below and in greater detail in the report at Appendix B.

### **Displacement**

8.3 Displacement is the effect of diverting trade away from existing accommodation providers in Anglesey. If these effects are proven to be significant then they will dampen down the net employment impacts of the scheme. In order to test the potential effects of displacement, an analysis of the existing tourism sector provision in the area and an analysis of the target market for the Penrhos Leisure Village are required.

8.4 This process has identified that the profile of visitors to Anglesey shows a high proportion of budget conscious family trips and is highly seasonal. The average age of visitors is higher than many other parts of the UK, reflecting the fact that another key market segment is trips by more affluent older couples.

8.5 An estimated 80% of visitor bed-spaces are on caravan and camping parks; largely small parks and without substantial on-site facilities. There are no contemporary year-round leisure village destinations on Anglesey with extensive indoor facilities.

8.6 The target market for Penrhos will largely be families with high spending power, and with high levels of occupancy throughout the whole year. The scheme will target those seeking a Center Parcs type experience but focussing on healthy

lifestyles and a coastal experience.

- 8.7 There is only very limited overlap between the target markets for the Penrhos leisure village and existing visitors, and as such any diversion of trade will be negligible/very low. Where displacement does occur it will be predominantly from other UK leisure village destinations.
- 8.8 Using HCA and OffPAT Additionality Guidance 2008 would suggest that, at worst, the Penrhos Leisure project would be described as a low displacement project... *“the scale of displacement effects will vary depending upon the nature of activity supported and local markets. For example if the supported business has few local competitors then the level of product market displacement will be low”.*
- 8.9 For low displacement projects a rate of 25% diversion should be assumed and 0% diversion for projects with no displacement. Our assessment of the Penrhos leisure development as a negligible/very low displacement project would fall somewhere between these two figures. With this in mind, we have modelled rates of 10%, 15% and 20% displacement.
- 8.10 The starting position for this assessment is the 465 FTE operational jobs on-site at Penrhos and the 80 FTE off site jobs associated with corporate supply chain expenditure and off-site visitor expenditure (545 FTEs in total).
- 8.11 The net new jobs under each of the displacement scenarios is follows:
- 10% displacement = 490 net additional FTE jobs
  - 15% displacement = 465 net additional FTE jobs
  - 20% displacement = 435 net additional FTE jobs.
- 8.12 The clear conclusion is that even under the worst case displacement scenario, the scale of job creation from the Penrhos Leisure Village scheme is still substantial. Any diversion that does occur could well be counterbalanced by the effects of the project on an overall enhanced profile for Anglesey and the new visitor trips that this could generate for existing businesses. Therefore the effects of job creation remain of moderate to major beneficial significance, as stated in the ES.

### **Supply Chain Impacts**

- 8.13 Additional information has been requested in relation to the potential supply chain effects of the proposals.
- 8.14 The on-site construction jobs will primarily span occupations within the early infrastructure works (earth moving, service roads, utilities contractors etc.), the main build programme (bricklayers, carpentry, electricians etc.) and site landscaping.
- 8.15 The majority of jobs in the completed leisure village are anticipated in housekeeping, food and beverage, leisure services and general administration. In general, the majority of jobs do not require advanced level skills.
- 8.16 Off-site jobs include those in local food and drink producers (to sell in on-site outlets) and other facilities and activities linked to tourism spend.
- 8.17 Local labour market data reveals plenty of existing skills in the occupations likely to be required. The data also reveals lots of latent capacity with a total of 900 JSA claimants currently seeking jobs in construction and personal/customer service type occupations.
- 8.18 This evidence supports the findings presented in the original ES, which identified that 110 FTE jobs could be expected through indirect and induced effects of the leisure village. Therefore the identified impacts remain as moderate to major beneficial.

### ***Mitigation and Enhancement Measures***

- 8.19 The following information is provided as a means to ensure that the beneficial effects predicted are delivered and specifically for the benefit of the local community.

#### *Construction Stage*

8.20 In order to encourage local contractors to bid for work packages, the Employment, Training and Supply Chain Strategy is likely to include a commitment to:

- Provide to the Head of Economic Development at IOACC a schedule of tender works packages six months prior to the commencement of the development, and a commitment to provide an updated schedule when new tenders are proposed.
- Notifying key project partners of the main construction contracts to be let. In large part this will be based on disseminating an Annual Statement of Predicted Tender Work Packages which the lead contractor will provide to the Council and a number of other relevant parties.
- Utilise any “list of suitable contractors” the Council may hold, ensuring that all appropriate companies on this list are aware of upcoming tendering opportunities.
- Facilitate an annual Meet the Buyer event, where the lead contractor will make themselves available for a series of pre-scheduled meetings with local suppliers.
- Include a request in all contracts issued by the applicant, and any appointed lead contractors on the scheme, that asks contractors to:
  - Inform IOACC of any construction-related job vacancies prior to them being more widely advertised.
  - Utilise appropriate local channels/projects when advertising any vacancies.
  - Provide a written statement in any tender documentation sent out to contractors and sub-contractors informing them of the contents of the Employment, Training and Supply Chain Strategy.

#### *Operational Stage*

8.21 To ensure the local labour force and other businesses benefit to maximum effect when the full scheme is operational, the Employment, Training and Supply Chain Strategy will include a commitment to:

- Work with local training providers during the construction phase to ensure they are aware of the upcoming permanent opportunities for staff and are

scaling up their provision accordingly

- Work with the local business community at construction phase to alert them of what goods and services are likely to be bought in on an ongoing basis.
- In the peak recruitment period, to hold a Penrhos Job and Careers Fair. This would be a partnership event which will raise awareness of contracting and subsequent employment opportunities amongst local workers, sole traders and small firms.
- Make available a number of local apprenticeships in key occupations such as retail, leisure attendants, and food and beverages.

### **Welsh Language**

8.22 Further to a request from IOACC, additional information in relation to Welsh language has been provided in an updated Welsh Language Assessment, which is presented at Appendix C. Although additional clarification has been provided in relation to many areas of the report, the conclusions of the ES chapter remains as previously stated, with an impact of minor adverse in relation to the temporary use for nuclear workers and minor to moderate beneficial for the long term use.

### **Social and Community Infrastructure**

8.23 In order to present a more thorough and systematic assessment of the implications for local Social and Community Infrastructure (SCI), four groups, which have the propensity to generate specific demands, have been identified. These comprise:

- Penrhos Leisure Village construction workers, i.e. any potential demands from those workers associated with the development of Penrhos Leisure Village, the Cae Glas site and the Kingsland residential units.
- Penrhos Leisure Village operations – i.e. any potential demands made by on-site workers, as well as visitors to the facility.
- Wylfa B Temporary Workers – i.e. any potential demands made by these temporary workers being resident at Cae Glas and Kingsland during their stay on Anglesey.
- Kingsland residents – potential demands made by these new residents.

*Construction Workers*

8.24 The construction of the Penrhos Leisure Village, including the works required at Cae Glas and Kingsland, will support an average of 420 FTE jobs per annum. This average figure can be broken down as follows:

- Around 150 FTE construction jobs are estimated to flow to existing Anglesey construction-related workers. As these are existing Anglesey residents, no additional SCI demands will occur.
- Of the 270 FTE construction jobs which will flow to non-Anglesey residents, it is estimated that around three-quarters (approximately 200 FTE jobs) will support jobs for workers who will never visit Anglesey (i.e. jobs supported through distant construction expenditure on fabrication, other construction services). Consequently, these workers do not give rise to any additional SCI demands.
- The remaining construction jobs, approximately a quarter (70 FTE construction jobs), are estimated to flow to workers who sometimes visit Anglesey as part of their contract. These workers will be on-site for particular periods of the build, either staying locally for short periods or operating as in-commuters. Given their nature, it is anticipated that these workers will give rise to some potentially modest SCI demands. It is anticipated that this would be mainly for healthcare reasons, with occasional GP, dentist and minor injury/A&E requirements – although the scale of these demands will be modest.

*Penrhos Operational Phase*

8.25 This group splits into two elements of potential demand generation:

- Penrhos Leisure Village Visitors – it is estimated that the leisure village, when fully open and operational will attract at least 150,000 visitors per annum.
- Penrhos Leisure Village Workers – it is estimated that the leisure village, when fully open and operational will support in the region of 465 FTE jobs.

8.26 The following provides an assessment of likely demand considerations:

- Given the range of activities and facilities on-site, we believe that these visitors will make no additional demands on community and leisure facilities, or indeed education. However, a small proportion of these visitors are likely to generate a low level of healthcare demand during their stay.
- The majority of workers at Penrhos (75%-90%) are expected to be Anglesey residents. These workers do not generate any additional SCI demands.
- It is estimated that the remaining workers are in-commuters to Anglesey. These non-resident workers may have occasional need for some form of medical treatment as part of their working day.
- The operator of the leisure park may enter into discussions with the local colleges regarding course and accredited training for workers (e.g. hospitality, health and safety etc.). However, the scale of these educational/training demands may vary if the operator elects to use private sector providers.

#### *Temporary Wylfa Residents at Cae Glas*

- 8.27 The proposal at Cae Glas represents an opportunity to temporarily house a large proportion of the construction workers associated with the proposed nuclear development at Wylfa. In total, it is estimated that there will be sufficient accommodation for up to 2,000 nuclear construction workers. It is anticipated that the Cae Glas site would not in the main be appropriate provision for worker families, or dependents. As such, the focus of this analysis is on the potential SCI demands which workers, rather than their families, may generate.
- 8.28 It is anticipated that the location of up to 2,000 temporary Wylfa workers at the Cae Glas site could potentially lead to the following SCI demands:
- Healthcare: Based on benchmarks for GP and Dentist provision, it is estimated that the proposed level of additional new worker residents would generate demands for 1.1 GPs, 1.3 Dentists, as well as some demands for minor injury and A&E clinical services, as required.
  - Education: There may be a requirement for nuclear contractors to fulfil training and accreditations during their time on Anglesey. While the scale of these demands, and how they would be met, is not yet known, there could be some

additional demands placed on local public colleges for course and accredited training for workers. However, the scale of these demands may vary if the operator elects to use private sector providers.

- Leisure: With 2,000 workers living on-site, and an array of shift patterns likely to emerge as part of the nuclear construction process, there will be considerable demand for food and drink, leisure and entertainment facilities both on and off-site. The Cae Glas proposal would accommodate a good proportion of the required leisure, food & drink demand.

*Kingsland Residential – when occupied by nuclear workers*

8.29 Along with Cae Glas, the development of 360 new houses at the Kingsland site also has the potential to be used to accommodate a large proportion of the construction workers associated with the proposed nuclear development at Wylfa B. The houses can be designed to accommodate circa 4 workers per house, but be future-proofed in their design, to ensure a transition to conventional family dwellings. On this basis it is estimated that the 360 houses could accommodate around 1,500 workers and potentially lead to the following SCI demands:

- Healthcare: Based on benchmarks for GP and Dentist provision<sup>24</sup>, it is estimated that the proposed level of additional new worker residents would generate demands for 0.8 GPs, 1 Dentist, as well as some demands for minor injury and A&E clinical services, as required.
- Education: There may be a requirement for nuclear contractors to fulfil training and accreditations during their time on Anglesey. While the scale of these demands, and how they would be met, is not yet known, there could be some additional demands placed on local public colleges for course and accredited training for workers. However, the scale of these demands may vary if the operator elects to use private sector providers.
- Leisure: With 1,500 workers living on-site, and an array of shift patterns likely to emerge as part of the nuclear construction process, there will be considerable demand for food and drink, leisure and entertainment facilities.

*Kingsland Residential*

- 8.30 The development of 360 new houses at the Kingsland site has the potential to accommodate around 860 residents, including approximately 160 children following the end of the Wylfa construction period and the conversion to family housing. For the purposes of this assessment it is assumed these residents would be additional to Anglesey.
- 8.31 The following demands are estimated to be the maximum once the site is developed for conventional housing.
- **Healthcare:** Based on benchmarks for GP and Dentist provision, it is estimated that the proposed level of additional new residents would generate demands for 0.5GPs, 0.5 dentists, as well as some demands for minor injury and A&E clinical services.
  - **Education:** The development scheme will place additional demands for around 160 school places. On completion of the development, it is estimated that there would be a requirement for 100 primary places and 60 secondary places. It is worth noting that this child yield is based on a survey of planning assumptions used by 40 local authorities. Education officers at IACC have suggested a higher figure but the survey evidence is considered more robust.
  - **Leisure/Community:** This new community of 860 residents will also place some additional demands on other leisure and community infrastructure. This will include public facilities such as libraries, leisure centres and community centres/facilities.

### ***Potential Impacts on Supply of Community Infrastructure***

#### *Healthcare*

- 8.32 **Temporary Construction Workers:** It is anticipated that these workers, who sometimes will visit Anglesey, will give rise to some potentially modest healthcare demands. It is anticipated that this is likely to include occasional GP, dentist and minor injury/A&E requirements.
- 8.33 **Penrhos Visitors:** Once completed and open for guests the Penrhos Leisure Village will have an on-site medical facility with trained medical staff able to meet the

immediate needs of guests with healthcare-related issues. This provision will be in line with the operators health and safety requirements for a facility of this nature. It is anticipated that the majority of visitors immediate health needs can be met via this facility. However, if further medical attention is required, there may be cause for visitors to attend the Penrhos minor injuries hospital, or the Bangor A&E facility. On balance, it is judged that these additional demands for such services will be of a low order.

- 8.34 Penrhos Non-resident Workers: It is judged that non-resident workers may have occasional need for some form of medical treatment as part of their working day. However, it is anticipated that the Penrhos on-site medical provision would deal with any such needs, in the first instance. As these workers are in-commuters, they are unlikely to generate any significant additional healthcare demands.
- 8.35 Temporary Wylfa Workforce: Land & Lakes are proposing, as part of their designs for an on-site 'worker hub' at Cae Glas, to make provision for a first aid centre with trained medical staff. If this facility did not come on stream right at the outset of the development, there may be a requirement to discuss with the relevant health commission authorities the extent to which there is surplus capacity within the identified local medical and dentist surgeries. At present no data on surplus capacity has been reviewed. Once the on-site medical facility is on-stream, it is envisaged that day to day healthcare requirements of workers will place no additional demands on existing healthcare provision.
- 8.36 Kingsland Residents: This development will lead to a further 860 residents requiring healthcare facilities. It is estimated that this could generate demand for an additional 0.5 full-time equivalent GP and Dentist locally. Given the anecdotal evidence on local facilities being at/near capacity, further provision will be required locally to meet their healthcare needs. Whilst Kingsland is occupied by Wylfa nuclear workers, these medical needs would most likely be met within the Cae Glas workers hub.
- 8.37 In summary, the potential impact of the development on demand for healthcare remains negligible, as stated in the original ES.

### *Education*

- 8.38 From assessing demand for education, and existing local supply, the key implications for local facilities are as follows.
- 8.39 Kingsland Residents: While the development of housing at Kingsland has the potential to deliver 160 children of primary and secondary school age in the long term (from approximately 2027 onwards), evidence on the supply of school places has shown that there is a significant over-supply of both primary and secondary school places locally. As a result, the development will not lead to any negative implications for schools locally, but potentially help to deal with falling school rolls. As such, the moderate to major beneficial impact on education identified in the original ES remains valid. However, it is recommended that the impact of demand for education is reconsidered at the time when the conversion to family housing is made, to determine the level of capacity that is present at that time.
- 8.40 College: Workers from Penrhos and from Wylfa contractors may place demands on the local tertiary college infrastructure to meet their training and skills needs. Land & Lakes would approach the local college regarding course and accredited training for workers (e.g. hospitality, health and safety etc.), while some Wylfa workers may also require on-going accreditations. While this provision may have implications for existing local college facilities, this could be lessened to some extent, with courses undertaken in facilities on-site at Penrhos or at Cae Glas. However, the scale of these demands on the local college may vary if Land & Lakes and Wylfa contractors elect to use private sector providers. The effect on demand for college places is therefore considered to be **negligible**.

### *Leisure/Community*

- 8.41 From assessing demand for Leisure/Community facilities, and existing local supply, the key implications for local facilities are as follows.
- 8.42 Temporary Nuclear Workers: With 2,000 workers living on-site at Cae Glas and 1,500 at Kingsland, and an array of shift patterns likely to emerge as part of the nuclear construction process, it is proposed that a worker hub facility will be

developed to meet the majority of workers' SCI demands. As outlined above, this will include an on-site medical facility. However, the hub will also include provision to meet other worker needs including, worker administration, transportation pick-up points, restaurants, bars and leisure facilities, including gym, TV lounges, pool tables, and outdoor football/sports pitches.

- 8.43 While the hub will meet the majority of workers' demands across a range of leisure and entertainment facilities, workers may also place some further demands on some public and private sector provision locally (e.g. local swimming pools, libraries, as well as local bars, pubs, and restaurants). However, given the socio-economic assessment identified a falling overall and working-age population, and a need to stimulate the local economy, it is anticipated that the injection of new workers and their expenditure will bring further additional benefits (i.e. vitality and vibrancy) to Holyhead.
- 8.44 Kingsland Residents: The development of new housing at Kingsland has the potential to accommodate around 860 new residents in the long term. These residents will also place some further demands on some public and private sector provision locally (e.g. local gyms, swimming pools, libraries, as well as local bars, pubs, and restaurants). Similarly to the above cohort, the additional population from Kingsland will play an important role in supporting these facilities and helping to increase local patronage of community and leisure facilities. This additional demand may also encourage further investment to improve the quality and scope of some of this provision.
- 8.45 On the basis of the above, it is considered that the temporary nuclear workers and the residents of new homes would generate a **minor beneficial** effect in terms of supporting local community and leisure facilities.

### ***Demographics and Population***

- 8.46 It was identified in the ES that the provision of employment (Penrhos / Cae Glas) and housing, including affordable housing, (Kingsland) was likely to give rise to a moderate to major beneficial direct, permanent, long term effect at the County level associated with the impact on population and households. Since the

submission of the application it has been confirmed that 50% of all properties at Kingsland that are temporarily occupied by nuclear workers will be offered as affordable housing. This will ensure that the potential **moderate to major beneficial** impacts to the population are realised.

### ***Health Impacts***

- 8.47 Comments were received in relation to the Health Impact Assessment (HIA) submitted as an appendix to the ES. However, these comments have necessitated no revisions to the HIA and the assessment remains as presented in the original ES.

## **9. LANDSCAPE AND VISUAL**

- 9.1 A detailed response was issued by IOACC to the LVIA submitted with the planning application. The points raised in this response have been addressed directly and in turn in the response note at Appendix F. The information presented in this section of the ES Addendum relates to the amendments to the assessment that have come about as a result of design changes. Comments in relation to cumulative impacts are dealt with in section 21 of this Addendum report.

### **Visual Impacts**

- 9.2 The amendments to the Kingsland access required the revision of the photomontage for viewpoint K2 and the revisions to the screening provision on the Penrhos headland required the revision of the photomontage for viewpoint P10. These revised images can be found at Appendix E.
- 9.3 In addition to the need to revise two photomontages, discussions with IOACC have resulted in the reassessment of a number of viewpoints. The viewpoints that have been reassessed are P10, P11, P12, P13a, K5, K6 and K7. The summary of the revised assessments is presented in the table at Appendix D. Of these revisions, it is concluded that the significance of impacts on views for P10 and P12 are reduced, whereas the impacts on viewpoints P11, P13a, K5, K6 and K7 are worse than previously predicted.

9.4 Further to comments received from IOACC and Countryside Council for Wales (CCW) (now Natural Resources Wales (NRW)), additional information is submitted in relation to cumulative landscape and visual impacts. This is presented at Section 21 of this report and at Appendix Q.

## 10. ECOLOGY AND NATURE CONSERVATION

### Introduction

10.1 This chapter provides clarifications and additional information concerning the impact of the proposed development on ecology and nature conservation. The chapter specifically addresses a number of queries raised by consultees following the submission of a planning application including an Environmental Statement. Consultation responses specifically relating to Ecology and Nature Conservation have been received from IOACC, CCW (now NRW), the RSPB and The Red Squirrel Society.

10.2 In some cases no response or clarification has been necessary, for example where a consultee is expressing their support for a mitigation proposal or where a planning condition is proposed to implement a mitigation measure. However in other cases a response is required to address an area of uncertainty or provide further clarification.

10.3 The following matters will be addressed in this section:

Subject	Nature of response	Consultee
Habitats lost, modified and gained	Clarification	IoACC <sup>1</sup>
The overall net loss/gain in reedbed habitat	Clarification	IoACC <sup>1</sup>
Statement of reasonable avoidance measures for reptiles	Additional information requested	IoACC <sup>1</sup>
Dog walking being prohibited within the proposed Cae Glas nature reserve	Clarification	IoACC <sup>1</sup>
The pollution protection of ponds/reedbeds post construction	Additional information requested	IoACC <sup>1</sup>

Management of areas of heathland	Additional information requested	IoACC <sup>1</sup>
Loss of semi-natural broadleaved woodland within the proposed Cae Glas nature reserve	Clarification	IoACC <sup>1</sup>
Loss of marshy grassland as a result of proposed cricket pitch at Cae Glas	Clarification	IoACC <sup>1</sup>
The planting of Scots pines in favour of proposed maritime pine	Clarification	IoACC <sup>1</sup>
Lichen interest on the site	Additional information requested	IoACC <sup>1</sup>
Evaluation of habitat for brown hares	Additional information requested	IoACC <sup>1</sup>
Potential Effects on the Holy Island Coast SAC	Additional information requested	CCW <sup>2</sup> RSPB <sup>3</sup>
The process for production, sign off, monitoring and enforcement of Management Plans	Additional information requested	CCW <sup>2</sup>
The relationship between the various management plans	Additional information requested	CCW <sup>2</sup>

<sup>1</sup> – Email dated 4<sup>th</sup> December 2012 received from County Ecologist Dave Cowley.

<sup>2</sup> – Letter dated 29<sup>th</sup> January 2013 from Maggie Hill Regional Director.

<sup>3</sup> – Email dated 13<sup>th</sup> December from Simon Hugheston-Roberts.

10.4 Included at Appendix I is a summary of ecological features at the site, set out in relation to Natural Environment Research Council (NERC) categories. This is provided in response to a request from IOACC.

### **Habitats lost, modified and gained**

10.5 It is confirmed that Table 10.10 of the original ES did take account of mitigation habitat when determining habitats lost, modified and gained. The column of the table headed Net gain or loss was incorrectly described as not taking account of mitigation habitats.

### **The overall net gain/loss of reedbed habitat**

10.6 Table 10.10 incorrectly indicates that there will be an overall loss of 0.29 hectares of reedbed habitat as a result of the proposed development. However new

reedbed habitat creation principally at Cae Glas and also at Kingsland will ensure that there is no net loss in reedbed habitat, thus ensuring a **negligible** impact.

### **Statement of reasonable avoidance measures for reptiles**

- 10.7 After further consideration of this matter it was agreed that a draft Construction Method Statement for Protection of Biodiversity Features should be prepared providing details of how statutorily protected animals and plants will be safeguarded during the construction period (See Appendix H – refer to page 6 and 7 for further details of Reasonable Avoidance Measures for reptiles). The Construction Method Statement for Protection of Biodiversity Features has been prepared in draft format since the document will require further development as specific detail of the development layout becomes available.
- 10.8 The draft Construction Method Statement for Protection of Biodiversity Features addresses the protection of reptiles, water vole, native bluebells, brown hare, amphibians and breeding birds as well as unprotected wildlife such as rabbits and red fox. The draft biodiversity method statement does not cover licensable European Protected Species, which will require separate Method Statements to be agreed with Natural Resources Wales.

### **Dog walking being prohibited within the proposed Cae Glas nature reserve**

- 10.9 Dog walking will be strictly prohibited in the proposed Cae Glas nature reserve. The Cae Glas nature reserve will only be accessible by residents of the Penrhos Leisure Village as well as being open to members of the public. The nature reserve visitor centre will be staffed by visitor management personnel including hospitality staff and reserve wardens. There will be a single controlled access point to the nature reserve via the visitor centre. Visitors to the nature reserve will also be required to comply with a schedule of site rules including a site rule which precludes visitors from bringing pet dogs onto the nature reserve.
- 10.10 The proposed Cae Glas nature reserve will have its own management plan which will provide details of all management objectives and prescriptions for the reserve.

Further information on visitor management will be provided in the Cae Glas nature reserve management plan.

### **The pollution protection of ponds/reedbeds post construction**

- 10.11 Access tracks are located in close proximity to some pond and wetland habitats at Penrhos, Cae Glas and Kingsland. Petrol interceptors will be installed in appropriate locations to ensure that pond and reedbed habitats are protected from potential pollution events associated with roads.

### **Management of areas of heathland**

#### Management Plans

- 10.12 Retained and new heathland areas within Cae Glas will be managed in the long term to maximise their wildlife and amenity value. Heathland management works would be undertaken in accordance with a Landscape and Wildlife Management Plans. Areas of heathland located within the Cae Glas nature reserve will be managed separately in accordance with the Cae Glas Wildlife Management Plan.

#### Avoiding the effects of trampling

- 10.13 Certain habitats at Cae Glas are sensitive to the effects of trampling including lowland heathland. Footpath layouts will be constructed to discourage walkers from accessing areas of lowland heathland. The sensitivity of such habitats will be highlighted on interpretation boards.
- 10.14 Wardens on the Cae Glas nature reserve will also educate visitors and undertake monitoring to identify the occurrence of desire lines within the nature reserve.

#### Monitoring the condition of heathland

- 10.15 Long term ecological monitoring of heathland habitat will be undertaken to assess its condition. The findings of this monitoring will inform habitat management proposals within the Management Plans.

10.16 There is a small area of acidic dwarf scrub and grass heath which has developed over rocky outcrops on the northwest boundary of the proposed Cae Glas nature reserve. These coastal heathlands are UKBAP priority habitats and possibly Annex 1 habitat. Access locations for footpaths in this area will be selected extremely carefully to ensure this sensitive habitat is not affected by trampling.

10.17 Areas of important acidic dwarf scrub and grass heath habitat will be subject to periodic detailed survey to assess the effectiveness of management measures.

#### Control of bracken

10.18 Bracken has become dominant and widespread within areas of heathland in the proposed Cae Glas nature reserve and beyond. Bracken has the ability to smother sensitive habitats, such as heathland, and evidence of this can be seen in many parts of the UK. The smothering process is achieved by the fronds blocking light and rainfall and the bracken litter prevents other species establishing.

10.19 Active management of the bracken will be undertaken to stop its spread and decrease its dominance, thereby protecting the heath/acid grassland habitats.

10.20 It is uncertain at this stage what the most effective method of bracken control would be on the Cae Glas nature reserve and it is likely that a range of control measures will be required.

10.21 Careful consideration should be given to using the effective bracken herbicide, Asulox, which does not affect heather species. The use of Asulox for the control of bracken near surface waters has been considered by the Pesticides Safety Directorate. Before the spraying of such areas is undertaken, the appropriate water regulatory body should be consulted.

#### Control of encroaching scrub

10.22 In some locations at Cae Glas there are signs of adjacent woodland and scrub habitat encroaching into areas of heathland. Selected thinning of encroaching

scrub is likely to be required periodically in order to prevent the gradual loss of heathland habitat.

#### Control of invasive plant species

10.23 Himalayan balsam, listed on Schedule 9 (*Wildlife and Countryside Act, as amended 1981*) as an invasive species, is present within areas of heathland habitat in the proposed Cae Glas nature reserve. This species will be eradicated from the area as it could potentially become dominant and decrease the amount of heath/acid grassland habitat.

#### **Loss of semi-natural broadleaved woodland within the proposed Cae Glas nature reserve**

10.24 It is confirmed that no mature broadleaved woodland will be lost within the proposed Cae Glas nature reserve, either to implement the construction of the visitor centre or management objectives within the Cae Glas Wildlife Management Plan. However open spaces will be created within extensive areas of pre-thicket regenerating woodland within the nature reserve to provide basking habitat for the resident common lizard population. Therefore, there will be **no impact** upon semi-natural broadleaved woodland at the Cae Glas nature reserve.

#### **Loss of marshy grassland as a result of proposed cricket pitch at Cae Glas**

10.25 The construction of a cricket pitch at the west end of Cae Glas in the location known as Trearddur Mews will result in the permanent loss of a small area of species poor marshy grassland. Marshy grassland will also be lost from the boundary of the extensive reedbed habitat on the north boundary of Kingsland.

10.26 One of the objectives of the Landscape and Wildlife Management Plan will be to increase the species diversity of species poor marshy grassland retained in Cae Glas. It is proposed that this will be achieved by temporarily stopping sheep grazing in selected locations, including habitat in the north end of Cae Glas and also parts of Trearddur Mews to the west. Ceasing grazing will allow habitat

structural diversity to increase as well as species diversity providing better habitat for invertebrates and ground nesting birds such as common snipe.

- 10.27 Detailed vegetation surveys will be undertaken on areas of marshy grassland where grazing has been stopped after one year to monitor any change in habitat diversity.

### **The planting of Scots pines in favour of proposed maritime pine**

- 10.28 It is a nature conservation priority to provide an increased diversity of feeding resource for the introduced red squirrel population at Cae Glas. This is because much of the tree cover associated with the proposed Cae Glas nature reserve and the adjacent Penrhos Coastal Park is composed of Corsican Pine and sycamore, which are of low value as a feeding resource for red squirrels.
- 10.29 Woodland management within the coastal conifer plantations within Cae Glas and Penrhos Coastal Park will aim to increase structural and species diversity by planting a range of broadleaved tree species. Trees known to provide feeding opportunities for red squirrel which will be used in woodland planting areas will include Scot's pine, hazel, sweet chesnut, English oak, holm oak and walnut.
- 10.30 It has also been proposed that maritime pine (*Pinus pinaster*) is planted since this species will help new areas of tree planting to establish successfully whilst also providing food for red squirrels (Shuttleworth, pers comm., Mar 2012). The planting of alternative pine species to benefit red squirrels, including maritime pine, is also promoted in the Welsh Assembly Government's Glastir guidance.
- 10.31 It is acknowledged that the maritime pine is not a native pine species to the UK although it is known to grow well in coastal situations in the UK. It is intended that maritime pine are only planted in the Cae Glas nature reserve where the red squirrel breeding site is located. Maritime pine will constitute no more than 10% of the overall new trees plants in the nature reserve. The maritime pine will be planted to replace some of the abundant Corsican pine on the nature reserve, which provides few benefits for red squirrel.

### **Lichen Interest on the Site**

- 10.32 Preliminary ecological surveys undertaken by Capita Symonds in 2010 identified lichen interest on maritime rocks associated with the coastline of the Cae Glas nature reserve. A lichen survey was subsequently requested by IOACC to help inform detail of tree removal, specifically with regard to lodge positioning in the Penrhos, and encourage interest in lichens as an educational element of the proposal.
- 10.33 A targeted survey of potential lichen supporting habitats in Kingsland, Penrhos Coastal Park and Cae Glas was undertaken by lichen ecologist Dr Mike Gosling. The lichen survey report is included at Appendix G.
- 10.34 Overall no nationally or internationally important lichen species were found. No lichens on the BAP list were found, only 2 species in the RIEC (Revised Index of Ecological Continuity) were found, these were *Enterographa crassa* seen at two sites and *Pyrenula chlorospila* seen at one site. Most lichens seen were representative of the habitats in West Wales and other relatively unpolluted parts of the western UK.
- 10.35 The lichen assemblage associated with woodland blocks at Penrhos Coastal Park was very poor due to the dense nature of the woodland and many trees had no lichen interest. Two trees adjacent to the northern boundary wall (NGR: SH273814) stood out from the other trees in the wood with extensive leafy lichens including *Flavoparmelia caperata*, *Melanelixia glabratula*, *Parmotrema perlata*, *Parmelia saxatilis*. These are common lichens throughout Britain but this was the only place they were seen in such relative abundance. This is likely to be due to the lack of shading and open aspect of these two trees. The two trees will be retained under existing development proposals.
- 10.36 It was concluded that proposed tree works, particularly opening up dense woodland blocks to create glades for lodge construction, will create opportunities for lichens to become established.

10.37 The lichen assemblage associated with maritime rocks within the proposed Cae Glas nature reserve was in superb condition, luxuriant and with diverse species zoned from sea level inland from the black littoral zone through the supralittoral zone up to the terrestrial zone. This zonation often extended over 3-5 metres. Such a substrate has many micro-habitats and it is very likely that other species would be found with further analysis. The lichen interest of the proposed Cae Glas nature reserve will be another important educational feature for the site and will not be affected by development proposals. Therefore the potential impacts upon them are **negligible** and no specific mitigation measures are required.

### **Evaluation of Habitat for Brown Hares**

10.38 The main habitat of the brown hare in Britain is open farmland. Tapper & Barnes (1986; in Defra 2004) concluded that hares select areas where they have access to a range of crops and other food, and that home ranges expand to include this diversity. Quality of cover is also particularly important in terms of protecting leverets from predation. Brown hare tend to favour fields of at least 8 to 10 hectares in size, where they are able to detect predators more easily and outrun foxes.

10.39 Intensive field surveys in 2011 and 2012 included breeding bird surveys, winter bird surveys and reptile surveys which entailed surveyors walking line transects across all parts of Penrhos Coastal Park, Cae Glas and Kingsland. Brown hare would have been recorded as incidental records during these line transect surveys if they were detected. However at no time was brown hare detected although rabbits were abundant in some locations. The desktop survey revealed a single record for brown hare in 2005 at NGR SH266799 in Cae Glas.

### Penrhos Coastal Park

10.40 The Penrhos Coastal Park provides very little potential habitat for brown hare. The only open habitat is located at the north end of the site where species poor grazed pasture is present. The only open area of pasture is approximately 13 hectares in size however the pasture is assessed as have negligible value as a feeding resource for brown hare. Therefore the potential impact of the

development upon brown hare at Penrhos is **negligible** and no mitigation is required.

#### Cae Glas

10.41 An open area of approximately 15 hectares of semi-improved species poor grassland is present at the centre of the Cae Glas site, which will be lost to development. The grassland is of limited value as a feeding resource for brown hare. Brown hares require a diversity of different types of food resources; however there are few other feeding opportunities in the immediate locality apart from semi-improved acid grassland to the west. None of the land in the wider locality is farmed for crops that could be used by hares. Cae Glas is assessed as being of low potential value for brown hares and therefore the potential impact is **negligible** and no specific mitigation is required.

#### Kingsland

10.42 An open area of approximately 20 hectares of semi-improved neutral grassland is present, which will be lost to development. The grassland is of limited value as a feeding resource for brown hare and, like Cae Glas, there are no alternative feeding resources available to brown hares in the immediate locality, such as agricultural crops. Kingsland is assessed as being of low potential value for brown hares and therefore the potential impact is **negligible** and no specific mitigation is required.

10.43 It is concluded that there are no significant impacts on brown hares. Brown hare has been included in the Draft Biodiversity Method Statement as a precautionary measure to ensure this UKBAP species is considered during the construction period.

#### **Potential effects on the Holy Island Coast SAC**

10.44 Further clarification has been requested regarding the potential effects of the proposed development on the Holy Island Coast SAC.

- 10.45 The Environmental Statement submitted in support of the Penrhos Leisure Village development initially identified a possible trampling impact on the Holy Island Coast SAC which was described as being of a low magnitude (see Table 10.18 row 3 of Environmental Statement Ecology Chapter). The potential effects of the trampling were described as being localised, affecting vegetation adjacent to footpaths located within 500 metres of three main car parks which provide access to the Holy island Coast SAC. A worst case scenario was subsequently identified which indicated that 3,000 square metres of heathland habitat (0.065% of total SAC) could potentially be effected by trampling as a result of the Penrhos Leisure Development. However this prediction did not take into account the fact that the visitor hotspots within the Holy Island Coast SAC (Breakwater Country Park and the South Stack RSPB nature reserve) are already actively managed and wardened to avoid trampling impacts occurring and certain additional information regarding the Penrhos Leisure Village development and how it will be operated to manage guest visitor movements. For this reason this worst-case scenario is not a realistic possible impact.
- 10.46 Before providing more detail as to why the Penrhos Leisure Development will not impact on the Holy Island Coast SAC, it is necessary to first clarify this predicted worst-case scenario of a loss of 3,000 square metres of heathland habitat. This figure was calculated on the basis that visitors from Penrhos Leisure Village were equally likely to use any of three car parks which provide access to the Holy Island Coast SAC. However, for reasons which will be explained the vast majority of visitors will visit the car park associated with the Breakwater Country Park. It is calculated that visitors to the Breakwater Country Park would have to walk a distance of approximately 375 metres from the Information Centre adjacent to the car park area prior to accessing parts of the Country Park within the Holy island SAC. The footpath layout effectively prevents visitors from walking directly onto the SAC. Therefore continuing on the basis that the majority of visitors will not walk more than 500 metres from their car it is apparent that the capacity for visitors to affect the SAC is greatly reduced.
- 10.47 The Penrhos Leisure Village development will be operated in such a way that visitors are discouraged from using their cars whilst staying on Holy Island. For this reason car parks within the Cae Glas and Penrhos parts of the Leisure Village

are positioned in locations separate from the lodges and other accommodation. Instead, visitors will be given the opportunity to visit a range of local attractions by signing up for organised trips organised by the Leisure Village. Visitors will be ferried to the local attractions via shuttle buses thus avoiding the need for visitors to use their cars. It is envisaged that the Breakwater Country Park will be one of the local attractions which will be visited by shuttle buses since it is a popular site which has good visitor facilities including a large car park and a well maintained network of footpaths. No shuttle bus trips are planned for the other two park parks located close to the Holy Island Coast SAC since the facilities associated with these car parks are not sufficient to make shuttle bus parking feasible.

- 10.48 Based on the findings of the Thames Basin study it is also important to consider the availability of other attractions in the vicinity of the Penrhos development. The Penrhos and Cae Glas sites will have varied sports and leisure facilities including the Penrhos coastline, Cae Glas nature reserve, extensive gardens and woodland walks, and nearby areas of heathland. The presence of other attractions in close proximity to the Penrhos sites will help to reduce visitor pressure on the Holy Island Coast SAC.
- 10.49 The Breakwater County Park has confirmed that the parts of the Holy Island Coast SAC located within the Country Park are not affected by trampling impacts since the site is effectively maintained and wardened. Therefore it is unlikely that an increase in visitor numbers to the Breakwater Country Park, due to the proposed shuttle buses from the Penrhos Leisure Village, would result in significant losses in heathland habitat due to trampling.
- 10.50 It should also be emphasised that the Penrhos Leisure Village development has always been intended to be an ecologically sound holiday destination that will encourage its visitors to enjoy the wildlife importance of Anglesey, whilst ensuring that visitors are educated about the sensitive nature of wildlife. Users of the shuttle bus system to the Breakwater Country Park and other wildlife destinations on Anglesey and the surrounding area will be educated about the sensitivity of wildlife and the importance of respecting it. Visitors will also learn from resident wardens to respect and value wildlife when visiting the proposed site-based Cae Glas nature reserve. The frequency of shuttle buses to the Breakwater Country

Park will also be determined through consultation with the Breakwater Country Park to ensure that any increase in the number of visitors to the Country Park is sustainable. This matter would be reviewed on an annual basis to take account of new information and any changes in circumstances, such as improvements to current visitor facilities at the Country Park. This approach to protecting the sensitive heathland habitat of the Holy Island Coast SAC is therefore fully deliverable.

- 10.51 On the basis of accumulated evidence it can be concluded with a high degree of certainty that the proposed Penrhos Leisure Village development will not result in a significant effect on the Holy Island Coast SAC. Therefore there will be **no effect** on the integrity of the Holy island Coast SAC.

**Mitigation - the process for production, sign off, monitoring and enforcement of Management Plans**

- 10.52 The proposed Cae Glas Nature Reserve Wildlife Management Plan, Landscape and Wildlife Management Plan and Woodland Management Plan will be prepared by Land and Lakes' specialist consultants. All three management plans will be subject to the approval of IOACC, taking into the account the views of Natural Resources Wales and the RSPB.
- 10.53 The wildlife management plans would include a schedule of monitoring to determine the success of the management prescribed by the plan for protecting and enhancing species and habitats of nature conservation value.
- 10.54 Wildlife management plans would be reviewed and updated every five years, subject to the approval of IOACC, taking into the account the views of Natural Resources Wales and the RSPB.
- 10.55 It is proposed that there will be three separate management plans for the long term management of the development. One of the management plans will focus exclusively on the proposed Cae Glas nature reserve, which will help to ensure that the considerable wildlife interest associated with this location is protected. A second management plan, the Landscape and Wildlife Management Plan, will deal

with the management of all wildlife and landscape features located outside of the proposed nature reserve (the majority of the development). A third management plan will focus on all woodland areas within the development located outside of the nature reserve, the Woodland Management Plan.

### **Woodlands**

10.56 An Arboricultural Impact Assessment (AIA) report is presented at Appendix I. This document evaluates the effect of the development on trees across the site and sets out the mitigation measures that are proposed to offset them. This report also includes survey data for an area of woodland at Penrhos that was not subject to a survey prior to the submission of the planning application due to access complications and more detailed survey of the trees at Tre’Gof at Cae Glas. The following sections summarise the findings of the AIA.

### ***Potential Impacts***

#### *Cae Glas*

10.57 The primary tree related impacts of the proposed development in the Cae-Glâs area will be on woodland wildlife and local environmental protection values. The impact on public amenity, visual amenity, historical and tree quality values will be lower.

10.58 There will be a slight reduction in tree cover suitable for nesting birds due to overall tree removal. There may also be a potential loss of dray sites for red squirrels during improvement works in plantation W35.

10.59 The removal or extensive re-structuring of plantation compartments W13, W14, W16 and W17 will incur localised environmental impacts such as loss of shade and shelter, a rise in ground water levels and the possibility of increased soil erosion.

10.60 Following further compartmentalisation and valuation of trees close to Tre’Gof farmstead, the location of the new hotel within the footprint of the old farmstead is considered feasible. It will result in the loss of low and moderate value trees (C

and B-Category under BS 5837), all high value trees (A-Category) can be retained.

### *Penrhos*

- 10.61 The primary tree related impacts of development in the Penrhos area will be on public amenity, woodland wildlife, environmental protection and tree quality values. The impact on visual amenity and historical values will be lower.
- 10.62 A reduction in the size of the publically accessible Coastal Park has the potential to have the greatest effect on public amenity. Trees proposed for removal in compartment W45 and half of W63 are subject to statutory recognition of their visual amenity through the creation of a Tree Preservation Order.
- 10.63 There will be a significant reduction in temporary tree cover suitable for nesting birds by tree removal. The loss of part of plantation compartment W63 may also contain bat roosts.
- 10.64 The removal of part of plantation W65 is likely to increase the exposure of internal areas of the wider tree cover to non-prevalent winds.
- 10.65 There will be a slight reduction in carbon sequestration in the short-term associated with the direct loss of plantation.
- 10.66 The location of the Estate Cottages to the north of Penrhos Coastal Park will result in the greatest arboricultural impact and loss by area (W63, T66-120 and G67-100). This will result in the loss of a network of footpaths, wildlife and connectivity functions and a proportion of the older and better quality trees (plantation and garden individuals, A and B Category under BS 5837). The additional survey of trees surrounding Penrhos Farm shows that it would be feasible to retain a proportion of the highest value features in this area.
- 10.67 The loss of trees at the centre of plantation W45 to create a 'woodland parking area' will have differing impacts depending on the user group. To pedestrians who currently use the woodland there will be a direct loss of recreational footpaths;

but to car users the presence of trees will undoubtedly increase amenity value, compared to a typical urban or open space car park.

### *Kingsland*

10.68 The implication of development on trees in the Kingsland area will be very small. For this reason a measurement of impact against the different types of arboricultural values has not been undertaken.

### **Mitigation**

#### *Cae Glas*

10.69 The extensive tree planting proposals will be able to compensate for the loss of the relatively small area of low value plantation. This will provide an opportunity to connect currently fragmented tree cover and facilitate age and species diversification across the site.

10.70 A long-term management plan for retained woodland will ensure continuity of canopy cover and increase tree-related values. The security of regular funding will allow the appropriate planning and implementation of the works required to restructure large areas the coastal plantation vulnerable to wind-failure.

#### *Penrhos*

10.71 Mitigation in the Penrhos area will be provided in the form of new tree planting and secured management of retained trees. This, together with significant improvements to internal pathways and the creation of new boardwalks, will result in a better overall woodland tree stock that is more accessible to the public.

10.72 New tree planting presents an opportunity to mitigate in part for the loss of arboricultural values. Within the Quillet area tree quality and environmental protection values will be increased through selective retention and augmentation via new planting.

- 10.73 A long-term management plan for retained woodland will ensure continuity of canopy cover and increase tree-related values; a holistic woodland approach that includes the Holiday Village and Coastal Park would be of greatest benefit. The security of regular funding will allow the appropriate planning and implementation of the works required to improve the structure of retained plantation. An absence of any such management would allow a steady decline in value, before the natural cycle of self-sustaining woodland could be established.
- 10.74 Investment in the management of retained plantation has the potential to provide long-term mitigation for the loss of woodland covered by the Tree Preservation Order. This can be achieved through enhancement to a point where comparable amenity values are achieved or exceeded; a process that will be greatly accelerated by good silvicultural management.
- 10.75 The preparation and strict adherence to Arboricultural Method Statements (AMS) will be critical to maximising tree retention. The AMS process must consider construction logistics, material use, procedure and operational requirements of the development with the aim of minimising damage to trees and the soil they grow in. Build areas that will require guidance by an AMS will be identified at the detailed design stage. The consideration of trees at this time alongside other project disciplines (layout, drainage, utilities etc.) will aim to minimise future conflict and unnecessary tree loss.

#### *Kingsland*

- 10.76 New tree planting (3ha) presents an opportunity to establish tree cover that is significantly more diverse in terms of species, distribution and growth form than currently exists. Successful tree establishment will require appropriate species selection, the use of companion shelter and better acclimatised nurse trees.

#### ***Residual Impacts***

#### *Cae Glas*

- 10.77 Carefully considered new planting and plantation management will result in short-term loss of woodland cover but a long-term gain. The value of new planting will increase as it becomes established and will ultimately result in a net increase (approximately 4.3ha) in collective tree cover (inclusive of woodland, amenity trees and buffer planting).
- 10.78 Effective management of the existing treestock will alleviate inherent problems and catalyse the transition from plantation to woodland. The residual impact in this respect will be woodland of higher value and sustainability than would otherwise be likely if development did not occur.
- 10.79 Management of the coastal plantation will secure the future habitat of the red squirrel by diversifying tree age and species. This is considered a crucial step in the stabilisation of the very fragile, mono-age coniferous stands that currently support the species.
- 10.80 In summary, the residual impact of the proposed Cae Glas development on arboricultural value will be **minor adverse in the short term** (construction phase and first 20 years of the operational phase) with the potential for a net increase in values in the long-term resulting in a **moderate beneficial long term** effect.

*Penrhos*

- 10.81 The reduction in size of the publically accessible Coastal Park can be offset by the enhancement of retained plantations without detriment to the amenity of the coastal footpath. Investment in the enhancement of the retained Park and in the facilities therein has the potential to increase public amenity despite a reduction in overall size. This is considered to be a **minor beneficial** effect in the long term.
- 10.82 The negative impact on bird nest sites will decrease as new tree planting develops. The long-term residual impact in this respect is likely to be **negligible**.
- 10.83 The small anticipated increase in wind-exposure created by the removal of internal parts of W65 will be offset in the medium to long-term as new planting

matures. This has the potential to provide an increase in environmental benefits such as the provision of shade and shelter to the headland lodges, although the effect is of **negligible** significance.

10.84 Under the current proposals there will be a net decrease in tree cover (approximately 2.5 hectares). Potentially this could be interpreted as having the largest effect on arboricultural values in the short to medium term (construction phase and the first 20 years of the operational phase) before new tree planting becomes established. However, due to the make-up of the existing tree cover (plantation) and its diminishing value, due to the lack of management, this net decrease must be considered against the benefits that will be brought about through development. It must not be assumed that the absence of development would secure the plantations future when a primary risk of maintaining the status quo or potential closure of the Coastal Park due to a lack of funding, is likely to lead to the loss of the majority of existing woodland cover. This being taken into account, the long term management of the woodland would represent a **moderate beneficial** effect on the long term viability of the Penrhos woodland.

#### *Kingsland*

10.85 Development within the Kingsland area will have a positive impact in terms of trees with a considerable net increase in the number, distribution and species. The current proposals will establish 1.5 hectares of new woodland in addition to trees planted for amenity. This is considered to represent a **minor beneficial** effect in terms of the provision of local woodland.

10.86 IOACC's Tree Officer has requested additional information in relation to the methodology for selecting trees for removal to facilitate the placement of lodges within the woodland setting. This information is presented in Appendix L, along with direct responses to the individual points raised at Appendix K.

10.87 This evidence demonstrates that the appropriate methods to protect trees during construction will be implemented and therefore that the construction stage impact on woodlands would remain 'not significant', as stated in the original ES.

10.88 The Woodland Method Statement also provides clarification on the change in the amount of tree cover across the site. This is broken down as per the following table.

<b>Site</b>	<b>Existing Tree Cover (hectares)</b>	<b>Tree Cover Lost to Development (hectares)</b>	<b>New Tree Planting (hectares)</b>	<b>Net Gain/Loss (hectares)</b>
Penrhos	32	6.75	4.3	- 2.45
Cae Glas	41.5	6.71	11	+ 4.29
Kingsland	0	0	+3	+3
Overall	73.5	13.46	+18.3	+4.84

10.89 This increase in overall tree cover and the commitment to long term management of the existing and proposed woodland and trees present would ensure that the previous findings that impacts would be 'not significant' represent a worst case assessment. Therefore, the findings remain as stated in the original ES.

## **11. ARCHAEOLOGY AND HERITAGE**

11.1 The Heritage Management Statement presented at Appendix M seeks to further clarify the position and proposed management of heritage features at the site. This information was not submitted with the November 2012 planning application but the contents were considered during the drafting of the ES and the Design and Access Statement.

11.2 As this additional evidence provides clarification rather than new information, no further analysis is required and the conclusions of the EIA in relation to heritage remain as stated in the ES. Clarification has also been sought as to the further study work to be undertaken at the reserved matters stage for proposals at Penrhos. It is stated in the ES that a Conservation Management Plan will be prepared and submitted as part of any future reserved matters or Listed Building applications on the site. Conservation Management Plans will be developed in accordance with the criteria set out in paragraph 11.61 of the ES, which makes reference to Cadw's 'Conservation Principles' guidance document.

- 11.3 Comments have been received from IOACC's Planning and Conservation Officer in relation to the identification of listed buildings and other heritage features within the Penrhos site. In response to this, plans showing all listed buildings, the curtilage of listed buildings and other non-designation heritage features is presented at Appendix N.
- 11.4 Gwynedd Archaeological Planning Services (GAPS), as IOACC's archaeology adviser, has requested additional information in relation to further archaeological investigations that would be undertaken in advance of the first phase of development on the Penrhos portion of the site. In order to commit to a scheme of works that is acceptable to both the applicant and IOACC, a Statement of Intent is being prepared and will be submitted further to this ES Addendum.
- 11.5 The original ES set out the potential impacts of the proposed development, which included undertaking a programme of pre-commencement archaeological investigations that were agreed with IOACC. The Statement of Intent which will be provided details further archaeological works in addition to the first phase of works. However, the potential impacts as stated in the ES remain unchanged and no further analysis of impacts is required.

## **12. GROUND CONDITIONS**

- 12.1 Additional information in relation to minerals was requested by the North Wales Minerals and Waste Planning Service as the site has potential sand and gravel deposits, which are identified on the British Geological Survey (BGS) map of the UK. Accordingly, a study into the potential for mineral resources to be present at the site and an assessment of the significance of their potential sterilisation have been undertaken. The results are presented in full in the Minerals Study at Appendix O.

### **Planning Policy Context**

#### ***Minerals Planning Policy Wales***

- 12.2 MPPW (2001) sets out the national planning policy for land-won mineral extraction and related development in Wales, which the Minerals Planning Authorities (MPAs) should take into account in the development of their plans. MPPW requires that Unitary Development Plans should provide a clear guide as to where mineral extraction is likely to be acceptable and include policies which protect resources. The policies should include mineral resource in current use and which may need to be used in the foreseeable future. To this end, MPPW provides guidance on safeguarding of mineral resources and notes that safeguarding does not necessarily indicate an acceptance of working but that the "location and quality of the mineral is known, and that the environmental constraints associated with extraction have been considered".
- 12.3 Areas should be marked as Minerals Safeguarding Areas (MSAs) on plan maps and policies should be protected from permanent development which would "either sterilise them or hinder extraction". MPPW also states that prior to undertaking other forms of development, the potential for extraction of minerals must be considered. Under MPPW, areas for future working should be identified on a proposals map and take the form of 'specific sites', 'preferred areas' and 'areas of search'.
- 12.4 Inactive sites with planning permission for future working, but which are unlikely to be worked should be identified and a strategy with associated policies should outline the approach that will be taken with such sites (MPPW gives examples for this including the ability to make Prohibition Orders).
- 12.5 Another relevant point within MPPW, is the presumption against minerals development within National Parks and Areas of Outstanding Natural Beauty (AONBs) "save in exceptional circumstances".

### ***Minerals Technical Advice Notes (MTANs)***

- 12.6 The MTANs supplement MPPW and the guidance contained within is significant to decisions on individual applications and should be taken in to account by MPAs when preparing their plans.

- 12.7 Minerals Technical Advice Note (MTAN) Wales 1: Aggregates (2004) states that sand and gravel resources in North Wales must be safeguarded for possible future use. MTAN1 requires that development plans use buffer zones around permitted or allocated sites, within which no new sensitive development should be approved. MTAN1 defines "sensitive development" as "any building occupied by people on a regular basis and includes housing areas, hostels, meeting places, schools and hospitals where an acceptable standard of amenity should be expected" and "specialised high technology industrial development where operational needs require high standards of amenity".
- 12.8 Within MTAN1, the Welsh Government (WG) take the view that a minimum distance of 100m should be adopted for safeguarding around a sand and gravel site (unless there are "clear and justifiable reasons for reducing the distance").
- 12.9 MTAN1 requires MPAs to eliminate (in the period between its publication and "the next 5 years") any likelihood of future aggregate extraction at "historically obsolete and long dormant sites". MTAN1 refers to the need stressed in MPPW for MPAs to assess landbanks and consider where Prohibition Orders can be made. The aim is to provide a realistic landbank against which "need" for minerals extraction can be judged.

### ***Regional Technical Statements***

- 12.10 As a requirement of MTAN1, a Regional Technical Statement (RTS) has been produced for North Wales (2008). The RTS provides a strategic basis for local development plans in North Wales and its objectives include safeguarding land-based minerals.
- 12.11 The RTS advises on the minerals apportionments for each MPA and for planning purposes.
- 12.12 Anglesey has a joint sand and gravel apportionment with Gwynedd. The RTS recommends making allocations for of 1.5 million tonnes and that land based sand and gravel resources should be safeguarded. The RTS anticipates that the "vast bulk of sand and gravel would be derived from Gwynedd".

12.13 The RTS also notes the requirement of MTAN1 for all MPAs to assess and, if appropriate, pursue Prohibition Orders on long dormant sites.

***Isle of Anglesey Stopped Unitary Development Plan 2005 (SUDP)***

12.14 Chapter 15 of the SUDP outlines the Authority's policies for minerals and provides a context for minerals planning in the area. The plan states that "areas with extant planning permission [for sand and gravel extraction] are minimal with no commercial activity taking place" and that "the areas which have sand and gravel deposits lie within or close to designated areas of importance". The plan notes that sand and gravel is obtained from Gwynedd (with the exception of Tywyn Trewan which is the only sand and gravel site commercially operated, mainly serving its associated company) or from marine sources.

12.15 Safeguarding and efficient use of minerals is referred to within Minerals Policy 8 (MP8). This policy states that "*mineral resources will be protected from sterilisation unless there is a justified and overriding need for the development concerned*".

12.16 The plan also notes that in order to prevent the sterilisation of minerals which have smaller reserves (as opposed to the large reserves of hard rock, for example), developments which may affect future workings or possible extensions will be opposed.

12.17 In addition to this wording, the Planning Inspector recommended, in considering objections to the Plan, that "a 400m consultation zone extending from the outer edge of mineral sites". This amendment refers to maps in Appendix 9 of the SUDP which show the mineral sites and the extent of the consultation zones. The SUDP does not give a planning policy position on prior extraction.

**Approach**

12.18 A desk based assessment of geological and historical maps and a review of historic mining or quarrying activities has been undertaken. Several previous

reports that included reference to the geological conditions at or near the proposed development were reviewed for any additional information that they might provide about the permitted resource and areas of potential resource identified on the BGS mapping.

- 12.19 A series of trial pits were planned in order to identify the vertical and lateral extent of the potential area of blown sand. Specifically, the investigation was required to identify to what extent the permitted area had been worked, what potential resource may be remaining within the permitted area and the extent of similar deposits outside the permission.
- 12.20 Trial pits were limited to 3m depth, so as not to extend below the water table and only be dug to the full depth where sand identified as potential resource was present. These pits were terminated when the base of this sand was proved or, on the basis of the area's geological sequence, sand was not encountered directly below the topsoil. Exceptions to this were two shallower trial pits that were dug to prove the presence of sand between the greater-depth trial pit locations.
- 12.21 On completion, the site investigation covered 18 no. trial pits which extended to a maximum depth of 2.1m below ground level (m bgl). The deepest trial pit, which was within a unit of sand, was abandoned before the full depth of sand was reached due to stability issues.
- 12.22 Evidence gathered from the site investigation was used to evaluate whether the potential resource was of low medium or high importance and whether the magnitude of the impact of the development upon these resources constituted a significant effect.

### **Baseline Conditions**

#### ***Desk Based Assessment***

- 12.23 The BGS Minerals Resource Map for North Wales shows that the proposed development intersects with potential areas of mineral resource. Areas of potential mineral resource identified within the proposed development boundaries

are glaciofluvial sand and gravel located south of the A55 in the Cae Glas area; blown sand in the vicinity of the Penrhos sandpit and at Brynglas; and limestone near the Toll House pub in the east of the Penrhos Leisure Village boundary.

12.24 The 'Penrhos sandpit' (and a 400 m consultation buffer) is identified on the north west side of the Gorsedd peninsula on Map 11 in Appendix 9 of the Anglesey stopped Unitary Development Plan (2005). The sandpit was granted planning permission in 1955 for sand extraction.

12.25 An area that appears to have undergone extraction in the past has been identified in historical mapping in the north west of the Penrhos site, near Brynglas. However this appears not to have any planning permissions associated with it and to be of significant age (it was marked on a 1901 ordnance survey map of the area but not since). This sandpit is not safeguarded under the SUDP.

### ***Site Investigation***

12.26 The trial pits confirmed that the geology underlying this area generally comprises topsoil, with reworked/made ground in some locations, above clays, silts, silty sand, 'low-fines sand' or bedrock of schist. The low-fines sand was interpreted to represent the mineral type that had been exploited as a resource at the sandpit and might be suitable for use as a 'fine aggregate'.

12.27 The site investigation identified areas where former extraction had removed the sand (both from within and outside of the permitted zone) and three areas were defined on the basis of the thickness of the low-fines sand for estimating resource volume. The site investigation report concludes that quarrying activities have removed much of the workable low-fines sand within the permission and in general the deposits outside of the permission are not of similar quality. The exception to this appeared to be in the area of the raised dune feature.

12.28 The rough estimate of „saturated unprocessed low-fines sand“ remaining within the permitted area is 1,500 to 2,000 tonnes, ranging from 0.25m to 1 m thick. For areas outside the permission, the estimate of 'saturated unprocessed low-fines sand' is 9,000 to 14,500 tonnes. To put these figures in context, Anglesey

and Gwynedd are required by national planning policy to meet an apportionment of 1.5 million tonnes of land won sand and gravel. The potential resource that might be gained from the low-fines sand (dry and after silt removal) at Penrhos is likely to represent  $\leq 1\%$  of that apportionment.

### Potential Impacts

12.29 Tables 12.1 to 12.3 set out the assessment of potential impacts upon the identified mineral reserves at the sites, with significance stated in the right hand column.

Table 12.1: Significance assessment for impacts on the Penrhos sandpit permission

Assessment		Significance
Source and nature of change	<i>Proximity of a leisure development</i>	<b>Minor Adverse</b>
Receptor(s) and/or resource affected	<i>Less than 2000 tonnes of mineral in a permitted site</i>	
Key "built-in mitigation" measure(s), including design features and commitments	<i>No structures are proposed directly on the sandpit in the development plan</i>	
Strength of change	<i>Medium</i>	
Importance of receptor/resource	<i>Low</i>	
Material considerations (e.g. probability, duration, permanence and/or frequency)	<p><i>There is a small amount of material left in the permitted area.</i></p> <p><i>The remaining sand could be removed over a short time period prior to development (and potentially used on site) but would require modern planning conditions as the sandpit is dormant. This process would likely be uneconomical for a landowner/an operator for such a small amount of material.</i></p> <p><i>There are environmental constraints in this area (including AONB) so resuming extraction is likely to</i></p>	

	<i>be considered inappropriate when compared to the mineral gained and the natural regeneration of the sandpit (which will be retained). As such, this site appears to be a candidate for a prohibition order.</i>	
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Table 12.2: Significance assessment for impacts on the low-fines sand at Penrhos

<b>Assessment</b>		<b>Significance</b>
Source and nature of change	<i>Proximity of a leisure development</i>	<b>Minor Adverse</b>
Receptor(s) and/or resource affected	<i>An area of potential sand resource (less than 14,500 tonnes) neighbouring a dormant site (within a planning consultation buffer zone)</i>	
Key "built-in mitigation" measure(s), including design features and commitments	<i>No structures are proposed directly on this area in the development plan</i>	
Strength of change	<i>Medium</i>	
Importance of receptor/resource	<i>Low</i>	
Material considerations (e.g. probability, duration, permanence and/or frequency)	<i>The potential resource is small.</i> <i>It is within a zone safeguarded by policy.</i> <i>There are environmental constraints in this area (including AONB) so extraction is likely to be considered inappropriate under national policy, when compared to the mineral gained and the availability of existing alternative resources, such as marine sands (this is a supply assumption in local minerals policy).</i> <i>Extraction of these resources might require modern planning conditions on the neighbouring dormant site.</i>	

Table 12.3: Significance assessment for impacts on non-safeguarded potential resource

Assessment		Significance
Source and nature of change	<i>Proximity of a leisure development</i>	<b>Negligible</b>
Receptor(s) and/or resource affected	<i>Three small areas of potential resource at Toll House, south of A55 and Brynglas</i>	
Key "built-in mitigation" measure(s), including design features and commitments	<i>No structures or landscaping are proposed directly on these areas in the development plan</i>	
Strength of change	<i>Low</i>	
Importance of receptor/resource	<i>Low</i>	
Material considerations (e.g. probability, duration, permanence and/or frequency)	<p><i>These areas are not safeguarded in policy but have been included on the BGS Aggregates Safeguarding Map. The sand and gravels have been designated as Category 3 on the basis of geological unit type, irrespective of their size / workability / quality.</i></p> <p><i>There are environmental constraints in this area (including AONB and SSSI) so extraction may be considered inappropriate under national policy when compared to the mineral gained.</i></p> <p><i>In reference to the sand and gravel, existing alternative resources, such as marine sands, supply Anglesey and this provision is noted in minerals policy. As regards the limestone, there is a wealth of permitted hard rock mineral resource on Anglesey.</i></p>	

### Mitigation

12.30 On the basis of the foregoing assessment, the impact of the development proposals on minerals is classed as minor adverse at worst. No mitigation is suggested for the permitted Penrhos sandpit as prior extraction would be uneconomical given the small quantities of sand, its dormant status, natural

regeneration and location within an AONB. Likewise, no such mitigation is proposed for the other receptors.

### **Residual Impact and Conclusion**

- 12.31 The residual impact of the proposed development on mineral reserves at the site is **negligible** to **minor adverse**.
- 12.32 It has been demonstrated that the quality and quantity of the resource is low and that when considered against the target volumes for mineral extraction of sand and gravel in Anglesey and Gwynedd, the entire potential resource at the site represents less than 1% of this target.
- 12.33 Minerals Policy 8 of the Stopped UDP states that '*mineral resources will be protected from sterilisation unless there is a justified and overriding need for the development concerned*'. The development represents a project of national importance in terms of job creation, contribution to the nationally important tourism industry and plays a key role in delivering logistical support to the nuclear power station new build at Wylfa. Therefore, the development demonstrates a clear overriding need that outweighs the potential benefits of limited mineral exploitation at this site and therefore meets the test set out in the Stopped UDP policy MP8.

## **13. DRAINAGE AND FLOOD RISK**

- 13.1 Although the access arrangements for Kingsland have changed since the submission of the ES, the principles of foul and surface water drainage remain unchanged and as illustrated in the Flood Consequence Assessment. As such, new sewerage infrastructure will follow the route of proposed roads and will be subject to detailed specification at the reserved matters stage.
- 13.2 It was not made clear in the original ES, but it is confirmed at this stage that surface water runoff to ponds and other surface water bodies will be via appropriate petrol or oil interceptors where they are in the vicinity of roadways or car parking areas to prevent pollutants entering waterbodies.

- 13.3 No further assessment is required in relation to drainage and flood risk and the findings remain as set out in the ES.

#### **14. TRANSPORT AND ACCESS**

- 14.1 Clarification on a number of points was requested by the transport advisers to Welsh Government and IOACC. This information was presented in a response document that is included at Appendix P.
- 14.2 The majority of the issues raised were in relation to points of process and have now been agreed between all parties. This process of consultation has not required any further assessment and therefore the information presented in the ES remains valid.
- 14.3 The Kingsland access has been moved by approximately 18m to ensure that sufficient visibility is allowed for vehicles exiting the site. This is a minor design change that would result in no change to the modelled output of the Transport Assessment and no impact on driver delay or highway safety as described in the ES. Therefore, no additional assessment is required.
- 14.4 In relation to the use of the Kingsland site for temporary nuclear workers accommodation, it is understood that the majority of workers will be transferred between the site and Wylfa or Cae Glas by shuttle bus. On this basis it is envisaged that the permanent residential development will be the most onerous in terms of traffic movements and that the content of the TA and ES remain valid.
- 14.5 The change in the anticipated phasing of the proposals does not affect the TA and its findings as the latest assessment has been based on a worst case completion date of 2032.
- 14.6 The council has raised some concern regarding the arrival and departure of workers generally on and off the island, but we believe this to be a consideration for the Wylfa site rather than the proposed leisure development and no further assessment has been undertaken.

14.7 Clarification has been sought on the means by which the proposed development complies with the policies set out in Section 3.7 of TAN18, which requires the following:

- [locate] major generators of travel demand in city, town and district centres and near public transport interchanges, as a means to reduce car dependency and increase social inclusion by ensuring that development is accessible by public transport for those without access to a car;
- direct facilities for which there is a regular need to be located close to their users in local and rural centres, ensuring easy access for all, especially by walking and cycling; such facilities include primary schools, doctors surgeries and local convenience shops; and
- consider the potential for changing existing unsustainable travel patterns, for example through a co-ordinated approach to development plan allocations and transport improvements.

14.8 Although this information is presented in the TA, it is re-presented here for ease of reference. The leisure villages are located on the edge of the Holyhead settlement, which is extremely well served by strategic road (A55), rail (Holyhead to London/Chester) and ferry (Holyhead to Dublin) networks. This offers potential visitors to the leisure village a variety of sustainable travel options. Furthermore, as part of the development, a green shuttle bus will be provided that links the three component sites with Holyhead town centre, railway station and ferry terminal.

14.9 In terms of the ability to walk and cycle the development is located in close proximity to existing footpaths and cycleways linking to Holyhead, notably through Parc Cybi and along the A5, which the development will connect into. Holyhead is well served by primary schools with adequate capacity and other local conveniences as well as by strategic public transport infrastructure.

14.10 In terms of addressing existing unsustainable travel patterns, there is limited scope for a development project to have any influence as the policy is aimed at development plans. However, the provision of a large number of jobs will reduce

the distance that many local residents will need to travel for employment purposes. They would also be able to use the green shuttle bus to move between Holyhead and the development site.

14.11 Clarification is also required in relation to compliance with Section 3.15 of TAN18, which relates to tourism, and states that “proposals, particularly in rural areas, should demonstrate access by a choice of modes to avoid locking in the requirement for travel by car. Even small-scale tourist facilities that rely on car based travel can offer public transport information or arrange pick-ups from rail stations or coach/bus stops. In rural areas a lack of public transport access needs to be balanced against the contribution tourism makes to the rural economy in the specific area.” It is clear from the statements above that the sites are close to Holyhead, which is well connected by rail and ferry services, and that they will be connected to the settlement by the green shuttle bus. Therefore, it is considered that the site is very well served by sustainable means of transport.

14.12 Finally, clarification has been sought on the presentation of a Transport Implementation Strategy (TIS). A framework TIS was presented in the TA submitted with the planning application, the detail of which would be submitted with subsequent reserved matters applications. It is therefore considered that no further information is required at this stage.

## **15. AIR QUALITY**

15.1 It has been noted by IOACC that additional information will be required in relation to the air quality impacts of the proposed gas-fired CHP energy centres once detailed specifications are available. This information will, accordingly, be submitted with the relevant reserved matters applications. No further revisions to the submitted information have been requested.

## **16. NOISE AND VIBRATION**

16.1 This section of the ES Addendum addresses comments raised by IOACC on the Noise and Vibration Chapter of the ES.

16.2 In summary, the comments raised are pertinent to:

- reference which was made to the serving of a noise abatement notice on The Aluminium Powered Company (Alpoco);
- the status of current operations, in particular re-melting operations at the Anglesey Aluminium site;
- the potential for noise from recently replaced fixed plant items to the rear of the Holyhead Leisure Centre to deteriorate over time, and accounting for this in the previously completed assessment; and
- assessment of noise from the Combined Heat and Power plants (CHPs) which are proposed as part of the development.

16.3 Each of the comments raised have been addressed in turn below.

**Reference to Aluminium Power Company (Alpoco) Noise Abatement Notice**

16.4 Following completion of the initial baseline noise survey, which was undertaken to inform the completed noise assessment, modifications were made to operations at the Alpoco work facilities, which in turn changed the noise emission levels from this facility. Accordingly, an updated baseline noise survey was undertaken to inform the completed noise assessment after the installation of noise mitigation measures at this facility.

16.5 Following the changes made at the Alpoco works site, it was identified by IOACC that this site was operating in breach of the noise condition stated on the Site's Environmental Permit, including the generation of a tonal noise. Paragraph 16.79 of the ES stated that IOACC subsequently served a Noise Abatement Notice on the facility, as part of the process of addressing the breach of conditions.

16.6 It is now understood that a Noise Abatement Notice was not served, but that noise emissions from the site, and the tonal component were reduced through dialogue between IOACC and Alpoco and associated mitigation works.

- 16.7 As noted above, an updated baseline noise survey was undertaken, following the implementation of mitigation measures at the Alpoco facility, and the completed assessment was based on the results of this updated survey.
- 16.8 Whilst it is now understood that a Noise Abatement Notice was not served on the Alpoco Facility, the means by which the noise levels from the facility were reduced do not affect the results of the completed assessment. The results of the previously completed assessment, as reported within the ES therefore remain valid.
- 16.9 The IOACC memorandum notes that the completed assessment demonstrates how the nearest lodges to the Alpoco facility have been positioned in order to ensure acceptable levels are maintained in and around the lodges. The revised parking layout in woodland block W45 has now been amended into a more concentrated central area which then allows for a greater woodland sound buffer between the lodges and Alpoco.

#### **Status of Current Operations at Anglesey Aluminium**

- 16.10 Paragraph 16.73 of the ES states that "*Anglesey Aluminium is no longer in operation*". In response, the IOACC have comments that "*although smelting activities have ceased, re-melting activities continue and this site remains a source of possible noise*".
- 16.11 However, since this comment was raised, a press release from Anglesey Aluminium Metal Limited, dated the 22<sup>nd</sup> of February 2013 has been released. This press release confirms that a decision has been made to close the re-melt business, and that this will cease operations within the subsequent 2 months. The press release reads as follows:

*The Anglesey Aluminium Metal Board concluded yesterday that, in spite of extensive efforts to identify options to ensure the future viability of its re-melt facility in Holyhead, the business will cease operations within the next two months resulting in approximately 60 direct job losses.*

*Over the last few months an extensive effort has been made by AAM to identify potential money saving and value creation opportunities to offset the substantial losses facing the business. These losses were due to increased competition, material cost increases and a drop in demand for its products. In December 2012 AAM engaged in consultation with its workforce.*

*Klaus Stingl, Chairman of the AAM Board said "The AAM Board recognise the outstanding work that has been carried out by the employees and management team at Anglesey Aluminium in addition to their commitment to safety and their excellent work ethic"*

*Since the cessation of smelting activities in 2009 AAM has operated a re-melt business producing billet for the extrusion market. Over the last three years nearly 250, 000 tonnes of metal has been produced.*

*AAM will continue to consult with their employees to work through a timeline of events and a redundancy programme. The Health and Safety of AAM's employees will remain of paramount importance in this difficult time with additional workplace support being given to employees to help them seek alternative employment, this will be similar to the efforts made by AAM in 2009 when 400 people were made redundant due to the company not being able to gain a commercially viable power contract.*

*AAM will continue to work with the Welsh and UK Government and the Isle of Anglesey County Council to progress both the Land & Lakes and the Lateral Power projects in an effort to create a legacy for the local community by the creation of alternative employment opportunities. A small team will be kept on site to continue the de-commissioning works and maintain the site until it has been sold.*

*Anglesey Aluminium Metal is jointly owned by Rio Tinto Alcan and Kaiser Aluminium and commenced operations in 1971.*

16.12 Accordingly, it can be therefore be seen that the re-melt facility is to cease operations, and therefore that the findings of the previous noise assessment work remain valid.

### **Holyhead Leisure Centre – Potential Plant Noise Deterioration over Time**

16.13 The previously completed noise assessment included an assessment of fixed plant noise emissions from the Holyhead Leisure Centre on the proposed residential development at the Kingsland Site.

16.14 The completed assessment was based on measured noise levels obtained following recent replacement of the leisure centre Heat Recovery System.

16.15 The IOACC comment that they have spoken with the Leisure Centre Manager who has confirmed that the Heat Recovery System has been replaced, that current noise levels are probably a best case scenario, and that noise levels are likely to deteriorate with plant wear, as was likely the case with the previous equipment. IOACC has therefore requested that *“the applicant factor this into their assessment. Particularly given that it is unlikely that the Local Authority could undertake any Statutory Nuisance action in this instance should future complaints arise.”*

16.16 Firstly, it should be noted that it would not be common practice to include any margin for future increases in noise levels due to potential future plant wear and tear, the effects of which are by no means certain and would be difficult to predict. Furthermore, it would be the responsibility of the Leisure Centre to retain their plant in good order to prevent any significant future increases in plant noise levels.

16.17 It should also be noted that to suggest that it would be unlikely that the Local Authority could undertake any Statutory Nuisance action in the instance of future complaints arising is incorrect. Indeed the Local Authority would have legal obligation, as the statutory body, to ensure an appropriate response to any noise nuisance complaint which is raised.

16.18 Regardless of the above, it should be noted that there is control over the design of the proposed development, and that this allows for the potential generation of such future complaints to be appropriately addressed. Notwithstanding this, consideration has been given to the margins by which the previously adopted assessment criteria would be achieved.

16.19 Tables 16.18 and 16.26 of the ES detail that for Measurement Location 12 (which is on the site boundary adjacent to the leisure centre), the highest measured fixed plant noise level was 41.2 dB  $L_{Aeq,T}$ . Table 16.26 compares this measured level with internal and external assessment criteria adopted from BS8233: 1999: *Sound insulation and noise reduction for buildings – Code of practice*. The adopted criteria were:

- bedrooms - 30 to 35 dB  $L_{Aeq,T}$  ('Good' to 'Reasonable');
- living rooms – 30 to 40 dB  $L_{Aeq,T}$  ('Good' to 'Reasonable'); and
- external habitable spaces 50-55 dB  $L_{Aeq,T}$ ;

16.20 A duplicate of the pertinent tabulated information is presented below:

Table 16.1: Required Sound Insulation Performance for Dwellings on Site Boundary with Holyhead Leisure Centre, dB

Location	Period	Internal / External	Target Level from BS8233	Measured Site Boundary Level	Required Sound Insulation Performance (dB)
Measurement Location 12 (Leisure Centre fixed plant)	Daytime	External habitable space (e.g. garden)	50-55 dB $L_{Aeq,T}$	41.2	achieved
		Internal Living Room	30-40 dB $L_{Aeq,T}$	41.2	11.2 – 1.2
	Night-time	Internal Bedroom	30-35 dB $L_{Aeq,T}$	41.2	11.2 – 6.2

- 16.21 It can be seen from the table above that adopted daytime external noise level criteria are achieved, by margins of 8.8 and 13.8 dB respectively. These levels of compliance are considerable and essentially provide a significant degree of tolerance within the completed noise assessment.
- 16.22 With regards to the internal noise level criteria, it can be seen that in order to achieve 'good' internal noise levels would require a noise attenuation of 11.2 dB for bedrooms and living rooms. To achieve 'reasonable' levels would require attenuations of 1.2dB for living rooms and 6.2 dB for bedrooms.
- 16.23 In relation to mitigation measures, it is appropriate to consider the noise attenuation that could be afforded by the proposed building fabrication, as the minimum mitigation measure available to future occupants would be to close windows.
- 16.24 Planning Policy Guidance Note 24: *Planning and Noise* was the English equivalent of Technical Advice Note (Wales) 11: *Noise*, and provided guidance to Local Authorities on how the planning system can be used to minimise the adverse impact of noise. PPG24 stated that "*the insulation provided by any type of window when partially open will be in the region of 10- 15 dB*". These attenuation values are also detailed within BS8233: 1999: *Sound insulation and noise reduction for buildings – Code of practice* which states that "*if the windows are intended to provide rapid ventilation and summer cooling, the insulation will reduce to about 10 – 15 dB*". It is unclear whether these values are the expected attenuation values against external noise levels under façade or free-field conditions. However, it is typical to assume that a noise attenuation value of 10 to 12 dB against free-field external levels, and attenuations of 13 to 15 dB against façade external levels.
- 16.25 Assuming a 10 to 12 dB attenuation for a partially open window, it can be seen that 'good' internal noise levels would be approximated or bettered, whilst 'reasonable' internal noise levels would be achieved in bedrooms and living rooms, by margins between 4 and 11dB respectively. Furthermore, it should be noted that with closed windows (whole house ventilation rates could be afforded by the

use of frame mounted trickle ventilators or an equivalent system), significantly greater attenuation levels would be afforded.

- 16.26 Accordingly, it can be seen that the completed assessment has notable margins of compliance with the noise level criteria appropriate for residential accommodation. This essentially provides a significant degree of tolerance within the completed noise assessment.

**Assessment of Noise from the Combined Heat and Power Plants (CHPs) which are proposed as part of the Development**

- 16.27 The IOACC have commented that no assessment has been made with regards to the likely noise emissions from the Combined Heat and Power plants (CHPs), proposed as part of the development, and that these will require further assessment once the details are known.
- 16.28 As for other proposed fixed plant items associated with the development, the precise details of the proposed CHPs are not known at this stage. Accordingly, drawing upon the results of the completed baseline noise survey, it is appropriate to determine a series of fixed plant noise level limits to which the noise emissions from this plant should conform. This is considered within the Section of the ES noise and vibration chapter entitled '*Noise from proposed fixed plant items*'.
- 16.29 Drawing on the results of the completed baseline noise survey, and the guidance detailed with BS4142: 1997: *Method for rating industrial noise affecting mixed residential and industrial areas*, a series of daytime and night-time fixed plant noise level limits have been determined. The derived plant noise level limits can equally be applied to noise from the proposed CHPs, as well as other fixed plant items.
- 16.30 Within the ES it is demonstrated how the derived plant noise level limits could be incorporated into a conditional planning discharge to ensure a commensurate level of protection against noise for existing and proposed noise-sensitive receptors.

16.31 Accordingly, any potential noise emissions from the proposed CHPs are appropriately addressed within the completed ES.

16.32 Once the full details of the proposed CHPs are known, a detailed noise impact assessment could then be undertaken, including determination of any necessary mitigation measures to ensure compliance with the derived noise level limits. If considered necessary, the need for such an assessment, and compliance with any necessary noise mitigation measures could be ensured with the use of an appropriately worded planning condition.

### **Conclusion**

16.33 Consideration has been given to the comments raised by IOACC regarding the content of the ES Noise and Vibration chapter. This ES Addendum provides responses to the comments raised.

16.34 Each of the comments raised has been addressed in turn. Where necessary, additional clarification has been provided, and it has been identified that no updates to the previously completed noise assessment are required.

16.35 Accordingly, the findings of the previously completed noise and vibration assessments, as detailed within the scheme ES, including the identified residual impacts, remain unchanged.

## **17. WASTE**

17.1 No additional information on waste generation has been requested and therefore the ES chapter remains unchanged.

## **18. LIGHTING**

18.1 No additional information on lighting has been requested and therefore the ES chapter remains unchanged.

## 19. UTILITIES

- 19.1 No additional information on utilities has been requested and therefore the ES chapter remains unchanged.

## 20. SUSTAINABILITY

- 20.1 No additional information has been requested in relation to sustainability. The ES chapter and its appendices remain unchanged in relation to the design changes, save for confirming that the full Code for Sustainable Homes assessment will relate to the long term housing use rather than the short term nuclear workers accommodation use. Accordingly, any further assessment work in relation to Code for Sustainable Homes will be associated with the permanent use as residential dwellings.

## 21. CUMULATIVE IMPACTS

- 21.1 The assessment of cumulative impacts remains largely unchanged as no comments were received in relation to it. However, there have been issues raised by CCW and IOACC in relation to cumulative landscape and visual impacts. Accordingly, this section of the ES has been revisited with additional assessment presented below.
- 21.2 IOACC has raised the potential for the potential cumulative effects of the proposed development and Wylfa New Build to be presented in the ES. It was stated in the EIA scoping report that Parc Cybi, Holyhead Waterfront and the Renewable Energy Plant at the AAM Core site would be considered in the assessment of cumulative effects. IOACC did not question this approach in their scoping opinion.
- 21.3 As stated in the EIA Circular 11/99, "local authorities should have regard to the possible cumulative effects with any **existing or approved development**". Assessing the effects of the Wylfa scheme in conjunction with the leisure development would be impossible at this time due to the absence of any information about the scheme on which to base an assessment.

- 21.4 The principles established in the Bassetlaw case<sup>10</sup> are that it is not reasonable to require applicants for development consent to consider future development in a cumulative assessment pursuant to the EIA Regulations when proposals for the development of the remainder of the site were not reasonably foreseeable. We therefore strongly refute the requirement to consider the cumulative effects of the Wylfa development at this time.
- 21.5 It is advised that the EIA for the Wylfa project should consider the cumulative effects of other existing and consented schemes at the appropriate time, at which point the proposed development at Penrhos may be consented. Land and Lakes would be happy to share information with Horizon Nuclear Power to facilitate this assessment.

### **Cumulative Landscape and Visual Impact Assessment**

- 21.6 Guidance on methodology for cumulative impact assessment is currently limited. However, reference has been made to brief guidance within the Guidelines for Landscape & Visual Impact Assessment, 3rd Edition, 2013.

### **Significance of Landscape Impacts**

- 21.7 In determining the significance of the impact, account is taken of the sensitivity of the visual receptor, the importance of the view and the predicted magnitude of the impact. The impact is described in terms of either being beneficial, adverse or neutral, where the impact is clearly identifiable, and negligible where the impact is not clearly identifiable. An assessment of either major or moderate is considered significant.
- Major - Where there would be a very noticeable and highly significant alteration to the existing view
  - Moderate - Where there would be a clearly noticeable and moderately significant alteration to the existing view
  - Minor - Where there would be a perceptible alteration to the existing view, but one of low significance.

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<sup>10</sup> R (Littlewood) v Bassetlaw District Council [2008] EWHC1812 (Admin)

- Neutral - Where there would be a perceivable minor change in the character or view, but where this change will not result in a significant change, either positive or negative.
- Negligible - No discernable change in the existing view or landscape.

### Impacts on Designated Landscapes

#### AONB Cumulative Impacts

SITE	IMPACT ON AONB	CUMULATIVE IMPACT
Penrhos	Neutral	Neutral
Cae Glas	Minor Beneficial	
Kingsland	Minor Adverse	

#### SSSI Cumulative Impacts

SITE	IMPACT ON SSSI	CUMULATIVE IMPACT
Penrhos	Negligible	Negligible
Cae Glas	Negligible	
Kingsland	Negligible	

### Impacts on Landscape & Seascape Character

#### Landscape Character - National Level

SITE	IMPACT ON CHARACTER	CUMULATIVE IMPACT
Penrhos	Minor Beneficial	Neutral
Cae Glas	Neutral	
Kingsland	Minor Adverse	

#### Landscape Character - Regional Level

SITE	IMPACT ON CHARACTER	CUMULATIVE IMPACT
Penrhos	Neutral	Negligible / Minor Adverse
Cae Glas	Negligible	

Kingsland	Minor Adverse	
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## Landscape Character - Local Level

SITE	IMPACT ON CHARACTER	CUMULATIVE IMPACT
Penrhos	Minor Beneficial	Neutral
Cae Glas	Moderate Beneficial	
Kingsland	Minor Adverse	

## Seascape Character

SITE	IMPACT ON CHARACTER	CUMULATIVE IMPACT
Penrhos	Negligible	Negligible
Cae Glas	Negligible	
Kingsland	Negligible	

## Footpaths &amp; Cycleways

SITE	IMPACT ON FOOTPATHS	CUMULATIVE IMPACT
Penrhos	Neutral	Minor/Moderate Beneficial
Cae Glas	Major Beneficial	
Kingsland	Minor Beneficial	

## Topography

SITE	IMPACT ON TOPOGRAPHY	CUMULATIVE IMPACT
Penrhos	Negligible	Negligible/Neutral
Cae Glas	Neutral	
Kingsland	Negligible	

## Impact on Tree Cover

SITE	IMPACT ON TREE COVER	CUMULATIVE IMPACT
Penrhos	Minor Adverse	Neutral/Minor Beneficial
Cae Glas	Moderate Beneficial	
Kingsland	Moderate Beneficial	

## Impact on Other Site Features of Value

SITE	IMPACT ON SITE FEATURES	CUMULATIVE IMPACT
Penrhos	Moderate Beneficial	Moderate Beneficial
Cae Glas	Moderate Beneficial	
Kingsland	Moderate Beneficial	

21.8 The majority of the cumulative landscape impacts have been assessed as either negligible, equating to 'no change', or neutral, where there is potentially a minor change, but where this change will not result in a significant change to the character, either positive or negative.

### Cumulative Visual Impact Assessment

21.9 The 3 sites are visually and physically separate, and therefore views which are likely to be affected by the cumulative visual impacts of development within the three sites are extremely limited. The key viewpoint identified on Holyhead Mountain represents the best opportunity to view of all three sites together, and therefore allows consideration of 'worst case scenario' in terms of cumulative visual impacts. This viewpoint was identified as viewpoint 27 within the Landscape and Visual Impact Assessment. Refer to Figure 2 that accompanies this assessment, which shows the view from Holyhead Mountain. Figure 3 shows the photomontage of the proposals within the 3 sites. The photomontage demonstrates how the 3 developments will successfully assimilate into the existing developed and landscape context. The change in the view will be discernible, but will not constitute a significant change in the character of the view.

21.10 The assessment of cumulative visual impacts is summarised below:

View from Holyhead Mountain	Assessment
Receptor Sensitivity	High
Level of the View Importance	National
Predicted Magnitude of the Impact	Low
Predicted Significance of the Impact	Neutral

### **Proposed Development within the Site Context**

- 21.11 There are two consented schemes within the vicinity of the Penrhos, Cae Glas and Kingsland sites; the AAMR Renewable Energy Plant, which gained outline planning permission in 2011, and Parc Cybi, which gained outline planning permission in 2011 for a mix of business uses across the 120 acre site.
- 21.12 The Biomass and Parc Cybi schemes have been considered as part of the cumulative impact assessment. Sufficiently detailed information required to adequately assess the full impacts of the proposed schemes in conjunction with the Penrhos, Cae Glas and Kingsland developments is extremely limited. However, a number of photomontages have been produced, based on the accurate, but basic information available. These are presented in Appendix Q.
- 21.13 The viewpoints selected for the production of photomontages were considered to be the most sensitive views from which cumulative impacts are likely to occur, which were views from the coastal path, Holyhead Mountain, and the pedestrian bridge between Penrhos and Cae Glas. The cumulative photomontages area provided in a separate document and a brief description of cumulative impacts is provided below.

#### **Figures 1 & 2 - Penrhos View 12 – View from Coastal Path Year 10+**

- 21.14 The existing view is dominated by open agricultural land, woodland, agricultural buildings within the Penrhos Estate, and the AAM Plant. The AAM chimney forms the most prominent visual element within the view and detracts from the otherwise rural character of the view.
- 21.15 At Year 10+, the impact of the proposed Penrhos development was predicted to be **Minor Adverse**. Major or moderate adverse impacts were avoided due to the high quality, sensitive design of the lodges, associated landscape mounding to provide visual screening, and naturalistic planting to embed the lodges into the landscape.

21.16 The cumulative photomontages indicate that the Biomass Plant is likely to form a prominent new built element within the view due to the potential scale and massing of the buildings, including a new chimney. The Biomass plant will be industrial in character and is likely to detract further from the rural character of the view. The cumulative impact is there predicted to be **Major Adverse**, due to the predicted visual dominance of the Biomass Plant.

#### **Figures 3 & 4 - Penrhos View 13a/b – View from the Headland Year 10+**

21.17 The panoramic view from this location is dominated by open grass meadow in the foreground, substantial areas of woodland within the Penrhos Estate, and some views of open agricultural land and hedgerow field boundaries on the headland.

21.18 Holyhead Mountain forms an important landmark in the distance. The AAM chimney forms a negative visual feature in the view, adding a prominent industrial element, which is incongruous with the otherwise wooded, coastal and agricultural character of the view.

21.19 The cumulative photomontage illustrates the proposed development in conjunction with the Biomass Plant. The panoramic view illustrates that the vast majority of the proposed development will be hidden from view within the existing woodland. The proposed new structure that will replace the existing low quality Bathing House will form a high quality new element within the view. However, there will be some loss of open agricultural land on the headland due to the construction of headland lodges.

21.20 From this viewpoint, the proposed mounding and associated landscape will have limited potential to provide visual screening. When considered as part of the wider panoramic view, the impact is considered to be **Moderate Adverse**. However, the potential impact of the proposed Biomass Plant is more significant. The development will be industrial in character, adding further elements to the view that are out of keeping with the character of the view. The scale and massing of the development is likely to mean that it appears significantly above the tree line and will have considerable visual dominance. The cumulative impact is there

predicted to be **Major Adverse**, due to the predicted visual dominance of the Biomass Plant.

### **Figures 5 & 6 - Penrhos View 15 – View from Coastal Path Year 10+**

- 21.21 The existing AAM chimney is a highly visual element within the view due to its scale, and detracts significantly from the rural, coastal character of the view.
- 21.22 At Year 10+, the impact of the proposed Penrhos development was predicted to be **Neutral**. This reflects the prediction that glimpsed views of the lodges and associated landscape will be possible, however the existing character of the view will be retained. This is due to the proposed low height of the lodges, the use of natural materials the substantial set back from the coastal edge and retained agricultural land.
- 21.23 The cumulative photomontage indicates that the Biomass Plant is likely to have a major visual impact on the view due to the scale, massing and industrial character of the development. The cumulative impact is there predicted to be **Major Adverse**, due to the predicted visual dominance of the Biomass Plant.

### **Figures 7 & 8 - Penrhos View 27: View from Holyhead Mountain Year 10+**

- 21.24 This viewpoint represents the best opportunity to view both the 3 proposed development sites alongside both the consented Parc Cybi and Biomass plant. The visual impact of the proposed Penrhos, Cae Glas and Kingsland sites from this location was predicted to be **Neutral**. This assessment reflected the prediction that although the 3 sites will be perceivable, it will not fundamentally change the character of the view, either negatively or positively. This is because the proposed development will be seen against the backdrop of existing development. The photomontage demonstrates the appropriateness of the masterplans for the differing characters of the 3 sites in terms of their proposed character. The Penrhos and Cae Glas proposals appear as subtle additions to the view, embedded into the landscape, whilst Kingsland housing appears as a natural extension to the surrounding settlement. The existing AAM plant has a significant negative visual

impact in the view, due to the scale, massing and industrial character of the buildings.

21.25 The cumulative photomontage of the view indicates that both the Biomass plant and Parc Cybi are likely to have a significant negative visual impact, in addition to that already present due to the AAM plant. The proposed scale and massing of development within Parc Cybi contrasts with the predominantly residential scale of surrounding development. The scale and massing of the Biomass Plant creates a highly visible new element within the view and, due to the industrial character, has a negative impact on the view. The cumulative impact is therefore predicted to be **Major Adverse**, due to the Biomass Plant and Parc Cybi.

### **Figures 9 & 10 – Cae Glas View 3 – View from Pedestrian Bridge Year 10+**

21.26 The **moderate beneficial** assessment of the proposed development at Cae Glas on this view was arrived at primarily through consideration of who would constitute the visual receptors. At present, this route is not open to the public, there can therefore be no loss of views of agricultural land, as there are no views currently available whatsoever. If this route is opened up as part of the proposed development, the visual receptors will be holidaymakers or potentially visitors to Penrhos Country Park or Cae Glas Nature Reserve, who would expect views of the development. It is therefore considered that views of the high quality development and maintained planting within Cae Glas will be beneficial, contributing positively to legibility by visually connecting the Penrhos and Cae Glas sites. It is also likely that the planting along the A55 will fully screen views of the lodges as it continues to mature beyond 10 years.

21.27 The cumulative photomontage illustrates the Cae Glas proposals in conjunction with Parc Cybi. The photomontage indicates that proposed development within Parc Cybi is likely to be partially visible beyond the proposed lodge development, and will result in a **Minor Adverse** impact on the view due to the scale and massing of buildings, and the potential conflict with the predominantly leisure/holiday and residential character of other development within the view. However, it is predicted that potential negative impacts off Parc Cybi could be avoided at the detailed design stage through careful consideration of building

design, along with implementation of a strong landscape framework to provide visual screening.

21.28 The cumulative impact of the 3 sites Penrhos, Cae Glas and Kingsland is considered to have neutral impact on the AONB overall. Due to a lack of detailed information to fully assess the potential impacts of the proposed Biomass Plant and Parc Cybi on the AONB we must therefore conclude that the potential additional cumulative impact of Parc Cybi and the Biomass plant in conjunction with our proposals will be no worse than that which has been consented.

## **Conclusion**

### **Cumulative Impacts of Penrhos, Cae Glas and Kingsland**

21.29 The assessment predicts that for the majority of landscape elements, the predicted cumulative impacts will either be neutral (a small, discernible change not resulting in a significant change), or negligible (no discernible change in the landscape).

21.30 Cumulative impacts on landscape character have been assessed as negligible-minor adverse at the regional level.

21.31 Cumulative impacts on footpaths/cycleways, tree cover and other site features of value would result in minor-moderate beneficial impacts.

### **Cumulative Impacts of Penrhos, Cae Glas and Kingsland in conjunction with the Biomass Plant and Parc Cybi**

<b>View</b>	<b>Cumulative Assessment of 3 sites: Penrhos, Cae Glas &amp; Kingsland</b>	<b>Cumulative Assessment of 3 sites, the Biomass Plant and Parc Cybi</b>
View P12	Minor Adverse	Major Adverse
View P13a/b	Moderate Adverse	Major Adverse
View P15	Neutral	Major Adverse
View P27	Neutral	Major Adverse

View CG3	Moderate Beneficial	Minor Adverse
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21.32 The potential cumulative landscape impacts are difficult to define due to the outline nature of the proposals for Parc Cybi and the Biomass Plant. Careful design of buildings within Parc Cybi, along with a comprehensive landscape framework could potentially offset some of the potential landscape impacts. The AONB designation is of national importance and therefore requires considerable consideration in terms of impacts. As stated above, the assessment of the three proposed developments has been assessed as neutral, and therefore we must conclude that the potential additional cumulative impact of Parc Cybi and the Biomass plant in conjunction with our proposals will be no worse than that which has been consented.

## 22. RESIDUAL IMPACTS

22.1 The majority of the content of the November 2012 ES has not required significant amendment as a result of the minor design changes described or changes to planning policy.

22.2 Additional information has been presented in relation to the assessment of socio-economic effects, landscape and visual impacts, ecology and minerals. A summary of residual effects that differ from those identified in the ES are presented in the table below.

Category	Description of Residual Effect	Significance
Socio-economics, Regeneration and Health	Impacts on College Education	Negligible
	Impacts on Leisure/Community	Minor Beneficial
LVIA	Penrhos- Viewpoint P11 - IOACP	Moderate Adverse
	Penrhos- Viewpoint P12 Coastal Path	Year 1-3 Moderate Adverse Year 5-8 Moderate Adverse Year 10+ Minor Adverse
	Penrhos- Viewpoint P13a - The Headland- view north-west	Year 1-3 Major Adverse Year 5-8 Moderate Adverse Year 10+ Moderate Adverse

	Kingsland- Viewpoint K5 Yr Ogof, Mill Road	Year 1-3 Major Adverse Year 5-8 Moderate Adverse Year 10+ Minor Adverse
	Kingsland- Viewpoint K6 Photomontage	Year 1-3 Major Adverse Year 5-8 Major Adverse Year 10+ Major Adverse
	Kingsland- Viewpoint K7 Public Footpath	Year 1-3 Moderate Adverse Year 5-8 Moderate Adverse Year 10+ Minor Adverse
Ecology	Impact on Reedbed	Negligible
	Impact on Lichen	Negligible
	Loss of semi-natural broadleaved woodland within the nature reserve	No Impact
	Cae Glas woodland	Short term minor adverse; long term moderate beneficial
	Penrhos woodland - public amenity	Minor beneficial
	Penrhos woodland - bird nesting	Negligible
	Penrhos woodland – wind effects	Negligible
	Penrhos woodland	Moderate beneficial
	Kingsland woodland	Minor beneficial
Ground Conditions	Impact on Mineral Reserves	Negligible to Minor Adverse

**HOW Planning LLP**

**May 2013**

## FIGURES

Appendix A: Regulation 19 Request from Isle of  
Anglesey County Council

## Appendix B: Additional Socioeconomic Evidence

# Appendix C: Updated Welsh Language Assessment Report

## Appendix D: Updated Visual Impact Table

Appendix E: Update to Landscape and Visual  
Impact Assessment Appendix 9.5

## Appendix F: LVIA Consultation Response Note

## Appendix G: Lichen Survey

# Appendix H: Construction Method Statement for Protection of Biodiversity Features

## Appendix I: NERC Summary Table

## Appendix J: Arboricultural Impact Assessment

# Appendix K: Responses to Impact on Woodland Assessment

# Appendix L: Methodology for Development within Woodland Blocks

# Appendix M: Heritage Management Statement

## Appendix N: Penrhos Built Heritage Plans

## Appendix O: Minerals Study

Appendix P: Transport Assessment Technical  
Note 1 – Consultation Responses

# Appendix Q: Cumulative Landscape and Visual Impacts Study

This report has been prepared by HOW Planning LLP, with all reasonable skill, care and diligence. The scope of this report is subject to specific agreement and has been prepared solely for the benefit of our Client and should not be relied upon by any other party. Any third parties that use this information do so at their own risk. HOW Planning LLP accepts no responsibility for information contained within this report that has been independently produced or verified.

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