ISLE OF ANGLESEY COUNTY COUNCIL	
Report to:	Partnership and Regeneration Scrutiny Committee The Executive Committee
Date:	19th July 2016 - Partnership and Regeneration Scrutiny Committee 25th July 2016 - Executive Committee
Subject:	Consultation on Gypsy and Traveller Sites in Anglesey – Temporary Stopping Place for centre of the island.
Portfolio Holder(s):	Councillor Aled M Jones
Head of Service:	Shan L Williams, Head of Housing Services
Report Author: Tel: E-mail:	Lucy Reynolds, Housing Strategy and Development Manager Ext 2225 lucyreynolds@ynysmon.gov.uk
Local Members:	Cllr Meirion Jone, Cllr Jim Evans, Cllr Alun Mummery Cllr Hywel Eifion Jones, Cllr Victor Hughes, Cllr Llinos Medi Cllr Ken Hughes, Cllr John Griffith, Cllr Bob Parry Cllr Nicola Roberts, Cllr Dylan Rees

A –Recommendation/s and reason/s

Recommendations: following analysis of the responses to the consultation exercise and site assessment exercises outlined within the report, it is recommended that

1. Either of the following two sites,

- Site 1, Strip of land between A55/A5 between Llanfairpwll and Star Crossroads
- Site 2, Parcel of land at Gaerwen small holding

are preferred sites to be included in Local Development Plan (LDP) subject to the content of recommendation 3. On balance, officers are of the view that Site 1 can be planned and delivered within a reasonable timescale, whilst the same assurance cannot be given about Site 2.

2. Members of Partnership and Regeneration Scrutiny committee should provide their views as to which of these two sites is the preferred option for inclusion in the LDP

3. The Council should carry out further investigations into sites 1 and 2 to confirm their suitability. This should include:

a) an assessment of the impact of the proposed development on the setting of the nearby Scheduled Ancient Monument, and if this impact is considered acceptable, that further staged archaeological investigations are undertaken, as recommended by Gwynedd Archaeological Planning Service, to confirm whether the issues raised by the service would prohibit inclusion in the Local Development Plan

b) further assessment of any safety or technical risks posed by the site, and consider whether site design can resolve these.

4. IACC should appoint an appropriate consultant to prepare site design and to submit the requisite Planning Application for the selected site.

5. Note that Site 3, Land adjacent to the A5 near Cymunod Farm, Bryngwran, while not ruled out on planning grounds, has more constraints and should not be taken forward on account of the road safety issues identified by the necessity to create a new access to the site from the A5.

6. IACC should continue to fulfill its role to promote community cohesion. This must balance the needs of residents to feel safe and to be consulted on development issues with the recognition that the Council has legal responsibilities under the Equality Act 2010.

Reasons for recommendations

Officers have assessed a significant number of alternative sites and have taken account of Welsh Government guidance in developing the methodology to assess potential suitable sites. The three sites included in the recent consultation were considered to be the most suitable to be developed as a temporary stopping places.

In the period of the consultation there have been Drop In events and meetings with Community Councils for the locations where sites could be situated. Penmynydd Community Council and Bryngwran Community Council both arranged public meetings which were well attended. Over 70 people attended Drop In meetings in both Gaerwen and Bryngwran. Over 700 questionnaires were completed online or on paper. 14 letters were received in relation to sites 1-3 from members of the public or businesses, in addition to the responses from public sector consultees which are included as an Appendix. A petition entitled “Petition against Anglesey Council to locate a temporary Gypsy site on land near Cymunod Farm Bryngwran” containing 518 signatures has been

presented to the Council. It should be noted that the number of responses is not the governing factor in arriving at an appropriate decision.

For each of the three sites in the consultation, significant local opposition has been encountered during the consultation, though this cannot be used as justification for deciding not to recommend a particular site without evidence. There are currently no official sites for Gypsies and Travellers on Anglesey so it is understandable that this is an issue which causes worry. This absence of sites is in turn a reason for the unauthorised encampments which cause community tensions and negative perceptions of the Gypsy and Traveller community. Unfortunately in some cases the comments made demonstrated lack of knowledge about the Gypsy and Traveller community and its history in this country.

During the consultation we received a letter from Mr Mark Inwood, who raised a number of questions about the consultation process. A copy of Mr Inwood's letter is attached, along with the Council's response. Following the exchange of correspondence a meeting was held between the Joint Planning Policy Unit and Mr Inwood, where the questions were discussed in more detail. The Head of the JPPU explained to Mr Inwood that the recent consultation was held to identify a suitable piece of land to be included in the Joint Local Development Plan as a Temporary Stopping Place to address the needs of the Gypsy Travellers who have stayed in Mona in recent years, as identified in the Anglesey & Gwynedd Gypsy and Travellers Accommodation Needs Assessment 2016; she explained that guidance issued by the Planning Inspectorate relating to changes that become apparent during the Examination process (Matters Arising Changes) suggests that the Council may be required to carry out consultation and work on sustainability appraisal about MACs, and, on the basis that this process may generate fresh representations, the Inspector would extend the right to appear at hearings to those who seek an amendment which follows directly from the proposed post-submission changes. The current timetable for the Examination process suggests that the additional consultation would likely to be in November or December 2016. Some of the issues raised in Mr Inwood's letter will be addressed during the site design stage, whilst others will need to be addressed before a Planning Application is presented.

The responses to the consultation have been analysed. A summary of the consultation responses is provided later in the report. However greatest weight must be given to issues which objectively demonstrate that the use of a site identified would be a physical risk to the health and safety of occupants or the general public. In addition experience of the existing unauthorized encampments and the concerns that the local community have in relation to these offer evidence that a site which is more secluded will provide a better setting for this type of development. The costs of establishing such a site is a material

factor. Potential variable costs include land acquisition where the land is in private ownership and the costs of creating a safe access onto the highway and any necessary highway improvements. A comparison of the advantages and disadvantages of each site is provided later in the report. These show that all three sites can be developed but that to varying degrees there are constraints which should be investigated before proceeding to a planning application. In particular, the response from IACC Highways department confirms that road safety issues make it unlikely that an access meeting minimum visibility safety requirements could be achieved at Site 3, Land adjacent to the A5 near Cymonod Farm, Bryngwran, On a cumulative basis issues related to Site 3, are more significant and the other sites are therefore considered more appropriate to be taken forward for further investigation.

- The factors in favour and against the two remaining sites, Site 2 Parcel of land at Gaerwen smallholding and Site 1 Strip of land between A55/A5 between Llanfairpwll and Star Crossroads, are very different, reflecting the different circumstances and locations of the two sites:Gaerwen smallholding is currently within the IACC's ownership, and access via the A55 would not impinge on local villages. However, the proximity to the Science Park needs to be considered. Whilst Gwynedd Archaeological Planning Service have noted a Major Restraint, this does not rule out this site since staged archaeological investigations, combined with careful consideration during the design of the site, could address these concerns

- There are fewer economic development and technical concerns about the site at Star Crossroads. However, there would be additional costs due to the need to purchase two separate pieces of land from two owners.

On balance, officers are of the view that Site 1 Strip of land between A55/A5 between Llanfairpwll and Star Crossroads could be planned and developed to create a suitable site within a reasonable time-scale, whilst there is less certainty of being able to deliver the site at Gaerwen due to the need for further archaeological investigations.

During the consultation we have heard from a number of businesses who have concerns about the impact on insurance premiums which they understand are likely to increase if an authorised Gypsy and Traveller site is located nearby. We have brought this concern to the attention of Welsh Government since this is likely to be relevant to every Gypsy and Traveller site in Wales, and would apply equally to businesses in the vicinity of any of the three proposed sites. Planning Policy Wales Edition 8 (2016) sets out the land use planning policies of the Welsh Government. An increase in insurance premiums would not by itself be a factor and material

consideration that could be taken into account by the Planning Authority in deciding a proposed planning application.

Background

The Housing (Wales) Act 2014 places a duty on Local Authorities to provide sites for Gypsies and Travellers where a need has been identified. The Welsh Government's *Travelling to a Better Future* describes Gypsies and Travellers as having long been one of the most disenfranchised and marginalised groups in society. The Welsh Government is committed to redressing the inequalities faced by Gypsies and Travellers by improving equality of opportunity for all.

The Anglesey and Gwynedd Gypsy and Travellers Accommodation Needs Assessment 2016, undertaken in accordance with the Welsh Government statutory guidance on Undertaking Gypsy and Traveller Accommodation Assessments ,identified need both permanent and transit sites in the the two local authority areas in autumn 2015.

The statutory assessment for Anglesey carried out in accordance with Welsh Government requirements identified that there is a need for two temporary stopping places

- One Temporary Stopping Place to serve the needs of Gypsies and Travellers who make encampments of a few nights in transit to and from the port at Holyhead.
- One Temporary Stopping Place to serve the need of Gypsies and Travellers who have a traditional pattern of encampment for periods of up to several weeks in central Anglesey

This report concerns the consultation which took place on three sites which could provide a Temporary Stopping Place in central Anglesey.

In the course of the consultation process the Council has had new contacts with members of the Gypsy Traveller community who have either encamped at Mona in the past or are acquainted with Travellers who stay on Anglesey. These contacts provided feedback that they consider a transit site should be the type of provision made for the Gypsies and Travellers who frequent the central Anglesey. Transit sites are permanent facilities designed for temporary use by the Gypsies and Travellers who occupy them. Individual occupiers are permitted to reside on the site for a maximum of 3 months at a time. This is new opinion that has emerged since the Gypsy Traveller Accommodation Assessment of 2015. Based upon our analysis of travelling patterns, including recent conversations with those on the unauthorised encampment at Mona Industrial Estate, we are clear that the need is for a site to provide short stops of 2 or 3 weeks at a time.

Whilst we appreciate the concerns of Gypsies and Travellers about being evicted if their stay goes beyond the allowed stopping period we have not seen evidence of the need for stops for more than 3 weeks in usual circumstances.

Justification for recommending Site 1 or Site 2 be taken forward as the preferred site for inclusion in the Joint Local Development Plan subject to further relevent technical assessment of each site.

The following tables summarise the advantages and disadvantages of each site

Site 1 - Strip of land between A55/A5 between Llanfairpwll and Star Crossroads

Advantages	Disadvantages
• Has the road links necessary for a temporary stopping place (ie. direct access to A5 and easy access to A55) • The site is physically suitable to provide a suitable setting for a temporary stopping place (if limited to two rather than three fields to ensure that no land at risk of flooding is included). • Site is not immediately adjoining residential properties, protecting the privacy of both local residents and the site users • IACC Economic Development section forsee no issues related to this site and support in principle.	• Site adjoins a busy road. No footpath into nearest service centre. • Safe access onto the A5 from the site can be achieved but the vision splay need to be wide. Further technical and feasibility reports would be required. • Some of the land identified in the consultation is in the flood risk zone although there is sufficient land without needing to use this section of the land • As the site is in private ownership there will be acquisition costs for the Council • Local concerns that two sites for Gypsies and Travellers will be located in a single ward (The Council has selected land at Penhesgyn for inclusion in the Joint Local Development Plan to provide a permanent site for four New Traveller households)

Site 2 - Parcel of land at Gaerwen smallholding

Advantages	Disadvantages

• Site is well removed from residential properties, protecting the privacy of both local residents and the site users • Good access onto A55 for caravans without impact on local community. • The land is in Council ownership and will not entail the cost of land acquisition. • A new access from the site onto a quiet road can be provided without significant technical problems. • The location of the site means it would provide a safe environment for the family groups who habitually use temporary stopping places	• Further staged archaeological investigations would be required to ensure that this site could be progressed without impact on a scheduled ancient monument and an area of potentially national archaeological importance • The Science Park is to be developed in Gaerwen. Concerns have been expressed that establishing a temporary stopping place at the proposed location would reduce the appeal of the science park and could entail restrictions on public access to the Park. • The visual impact of the site when in use would be greater than the other sites due to its elevated position.

Site 3 - Land adjacent to the A5 near Cymonod Farm, Bryngwran

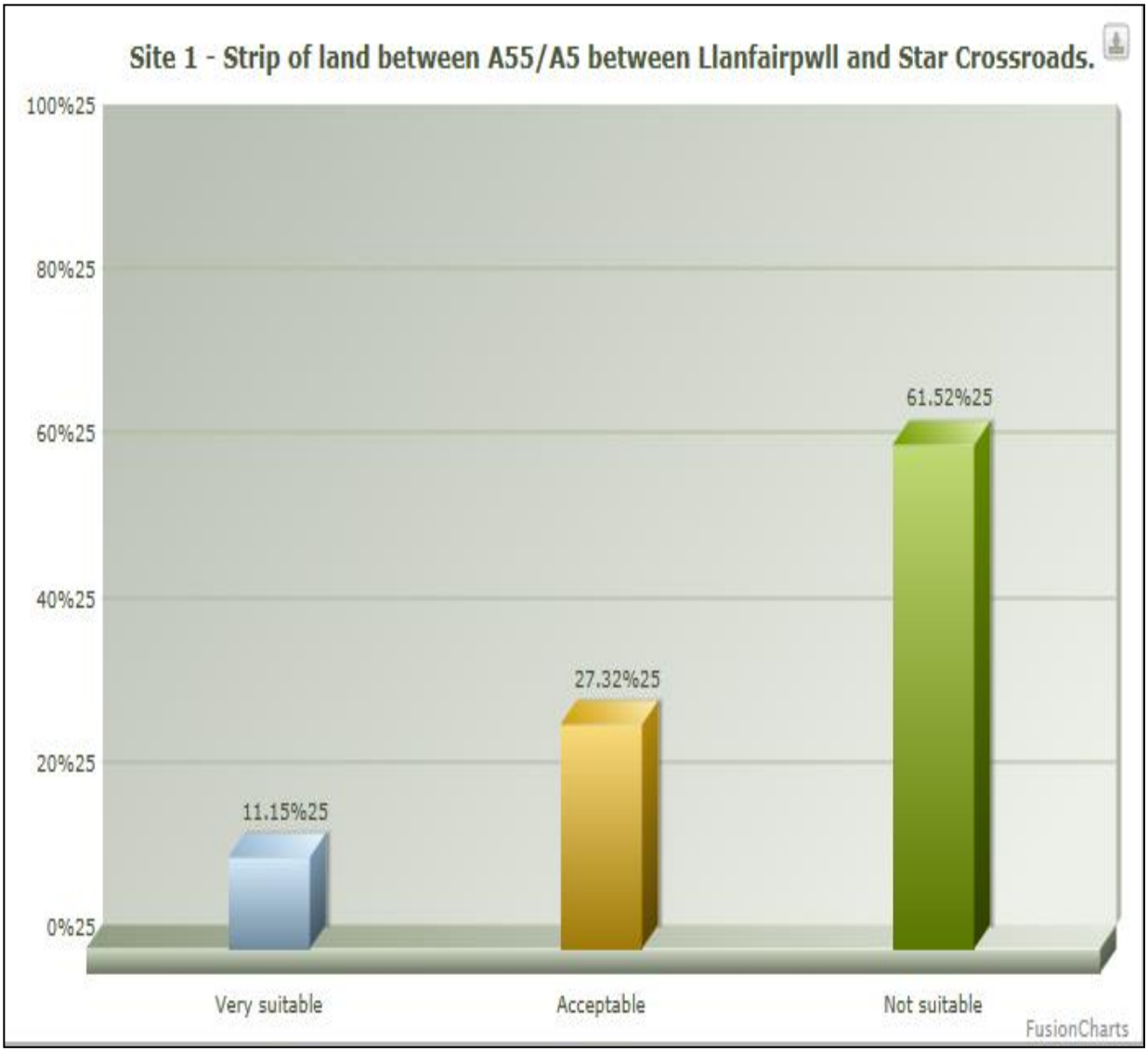
Advantages	**Disadvantages**
• Has the road links necessary for a temporary stopping place (ie. direct access to A5 and easy access to A55) • Site is not immediately adjoining residential properties, protecting the privacy of both local residents and the site users • The site is physically suitable to provide a suitable setting for a temporary stopping place.	• The existing access onto the land is substandard in terms of visibility. A new access could be created onto the A5 but there are road safety issues which means it is unlikely an access meeting minimum requirements could be achieved. This is on account of reduced visibility caused by blind brows and dips in section of the A5. • As the site is in private ownership there will be acquisition costs for the Council • IACC Economic Development section have concerns that the location of this site could impact on high value businesses in close proximity and the potential Park and Ride facility for Wylfa Newydd.

Summary of responses to consultation

Site 1 - Strip of land between A55/A5 between Llanfairpwll and Star Crossroads

538 questionnaires provided comments on this site. 4 letters were also received from members of the public or businesses in addition to responses from public bodies.

The following graph shows the percentage of respondents who commented on this site found the site Very Suitable, Acceptable or Not suitable.



The five most commonly mentioned issues why the site was not suitable were as follows

Too close to a dangerous busy road with no footpaths into nearby villages, concerns for travellers safety
Site could be unsightly and affect tourism in the area

The site is in a flood risk area and is prone to flooding in the winter
Fears of increased crime in the area
Too close to a residential area (residents would feel unsafe)

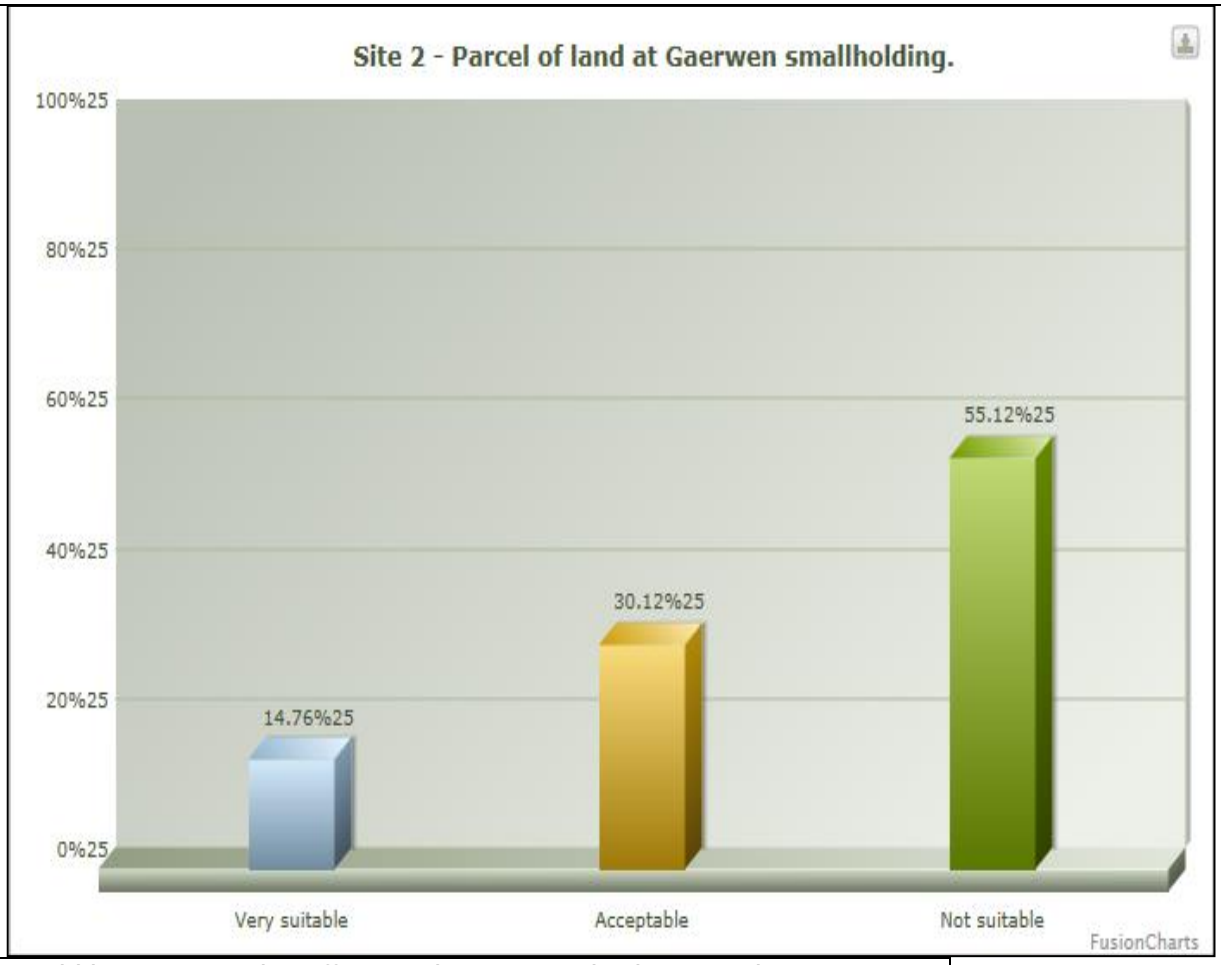
Reasons mentioned in support of the site included

Accessible and close to the A55
Not close to a school or dwellings

Site 2 - Parcel of land at Gaerwen smallholding

508 questionnaires provided comments on this site. 1 letter was also received from a business owner in addition to responses from public bodies.

The following graph shows the percentage of respondents who commented on this site found the site Very Suitable, Acceptable or Not suitable.



The five most commonly mentioned issues why the site was not suitable were as follows

Could have a negative effect on the proposed science park
Fears of increased crime in the area
Roads are too narrow and busy, concerns for travellers safety
Site could be unsightly and affect tourism in the area
Area of natural beauty and farmland which should not be used
Too close to a residential area (residents would feel unsafe)

Reasons mentioned in support of the site included

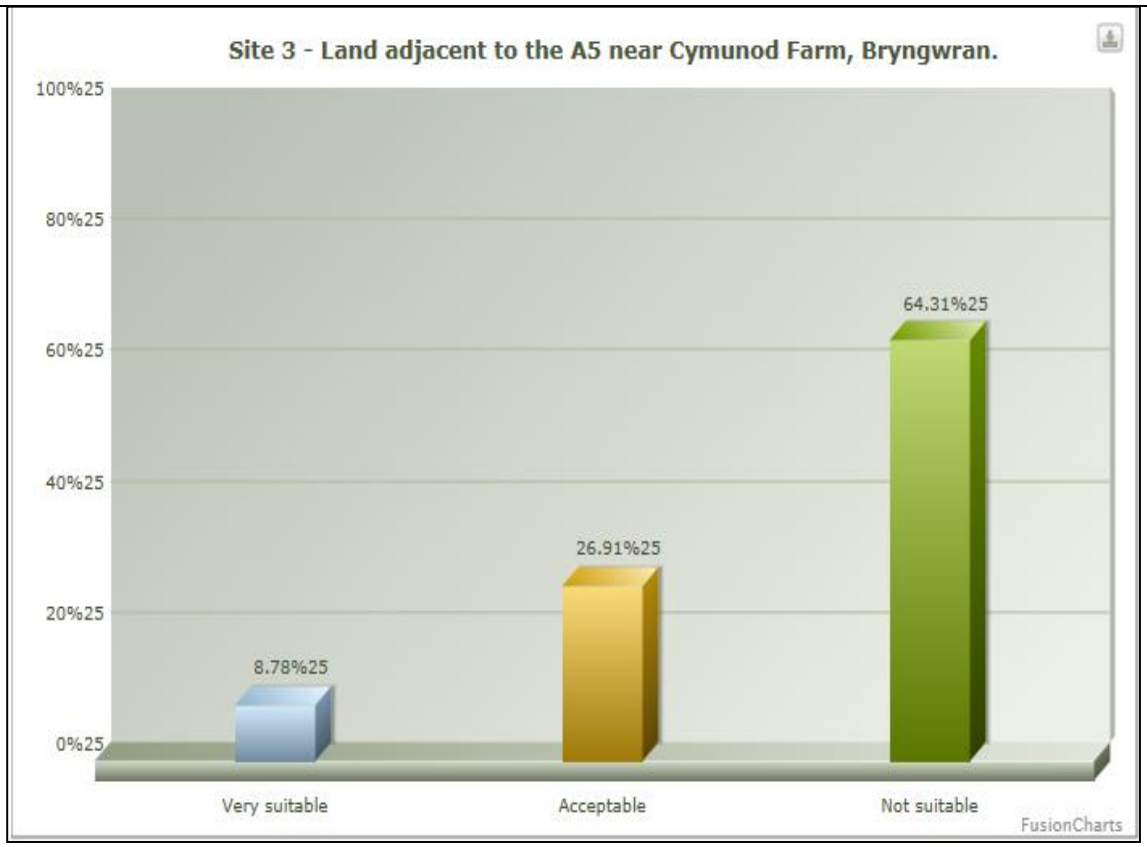
Accessible and close to the A55

Not too close to residential areas
Land belongs to the Council
Not close to a school/ nursery

Site 3 Land adjacent to A5 near Cymunod Farm, Bryngwran

524 questionnaires provided comments on this site. 9 letters were also received from members of the public or businesses in addition to responses from public bodies.

The following graph shows the number of respondents who commented on this site found the site Very Suitable, Acceptable or Not suitable.



The five most commonly mentioned issues why the site was not suitable were as follows:

Reasons mentioned in support of the site included

Fears of increased crime in the area
Road is busy and access to the site has a blind junction, concerns for travellers safety
Negative impact on the environmental (litter, noise, roaming animals) and health and safety of road users
Negative impact on local businesses
Too close to a residential area (residents would feel unsafe)
Not too close to the village/ residential areas
Accessible and close to the A55

B – What other options did you consider and why did you reject them and/or opt for this option?
See Reports and minutes of the Executive Committee of the Council held on the 31 May

2016.

C – Why is this a decision for the Executive?

The Housing (Wales) Act 2014 places a statutory duty on local authorities to provide sites for Gypsies and Travellers where a need has been identified.

CH – Is this decision consistent with policy approved by the full Council?

Yes

D – Is this decision within the budget approved by the Council?

Not applicable

DD – Who did you consult?		**What did they say?**
1	**Chief Executive / Strategic Leadership Team (SLT)** (mandatory)	
2	**Finance / Section 151** (mandatory)	
3	**Legal / Monitoring Officer** (mandatory)	
4	**Human Resources (HR)**	
5	**Property**	IACC Property department have been closely involved in the whole site identification process.
6	**Information Communication Technology (ICT)**	
7	**Scrutiny**	Partnership and Regeneration Scrutiny Committee met on the 19/7/16. Feedback will be provided to the Executive on the 25/7/16.
8	**Local Members**	All local Members had the opportunity to take place in the consultation.
9	**Any external bodies / other/s**	North Wales Police

		Natural Resources Wales Gwynedd Archaeological Planning Service Bodedern Community Council Llanfihangelesceifiog Community Council Bangor University SPARC IACC departments: Highways Section Drainage Section Regulatory Department (Economic Development, Planning, Environmental Health)

E – Risks and any mitigation (if relevant)		
1	**Economic**	
2	**Anti-poverty**	
3	**Crime and Disorder**	See Appendix Email from North Wales Police
4	**Environmental**	
5	**Equalities**	The report recognises that identifying sites for Gypsies and Travellers is an issue where the Council must be aware of its duties under the Equality Act 2010 and must take positive steps to promote community cohesion and prevent discrimination, harassment, or victimisation of Gypsies and Travellers who are a protected group under the Act.
6	**Outcome Agreements**	
7	**Other**	Risks of delay to the adoption of the emerging Joint Local Development Plan. Risk to the reputation of the Council.

F - Appendices:
Letters from: North Wales Police Natural Resources Wales Gwynedd Archaeological Planning Service Highways Section Drainage Section

Regulatory Department.
Bodedern Community Council
Llanfihangelesceifiog Community Council
Bangor University
SPARC
Dwr Cymru
Longlist of sites
Letter dated 13/6/16 from Mark J Inwood
Letter dated 29/6/16 to Mr Mark J Inwood
Cyngor Cymuned Penmynydd

FF - Background papers (please contact the author of the Report for any further information):

1. Consultation Document, Consultation on Gypsy and Traveller sites on Anglesey, February 2016.
2. Gwynedd and Anglesey Gypsy Traveller Accommodation Assessment, February 2016 Executive 08/02/16 and Partnership and Economic Regeneration Committee 02/02/16.
3. Presentation and minutes of the Joint Gwynedd and Anglesey Local Development Plan Panel dated 20/11/15 'Meeting the accommodation needs of Gypsies and Travellers in the Plan'.
4. Consultation Document, Consultation on Gypsy and Traveller sites on Anglesey, June -1st Jul,Topic Papers 2016.
5. Anglesey and Gwynedd Joint Local Development Plan Reports to the Joint Planning Policy Committee 29/01/2016
6. Anglesey and Gwynedd Joint Local Development Plan Topic Report 18A Identifying Gypsy and Traveller Sites –update 2016
7. Long list of sites identified by Officers of Anglesey County Council

APPENDIX 1 NORTH WALES POLICE

:nt from my iPad

:gin forwarded message:

From: "Harrison, Nigel S (T/Chief Superintendent 1710)" <Nigel.Harrison@nthwales.pnn.police.uk>
Date: 20 June 2016 at 11:58:37 BST
To: "Caroline Turner (CarolineTurner@ynysmon.gov.uk)" <CarolineTurner@ynysmon.gov.uk>
Subject: Temporary Stopping Places for Gypsies and Travellers on Anglesey'

Caroline

Below I have annotated North Wales Police response to the Consultation on 'Temporary Stopping Places for Gypsies and Travellers on Anglesey'. The geographical suitability or not of each proposed location is something that is not one for the police to comment on without supporting evidence. However we make the general points about all and some are duplicated from our previous comments on proposed permanent sites

- We recognise the need for Temporary Stopping Places (TSP) on Anglesey and from our records it would indicate hitherto unregulated TSPs have been apparent along the A55 corridor most prevalent in and around Mona and Holyhead.
- When entering the planning phase that our Community Safety department is given the opportunity to pass comment on the design to seek to minimise the risk of Crime and Disorder.
- We would also be keen that the TSPs do not expand and/or become permanent sites. The areas of land identified in some of the proposals are fairly large so limiting size will be required to prevent unexpected expansion. To this ends we need to understand how the time limitations and numbers of individuals attending is going to be managed.
- We seek to be sighted on any management plans put in place for the chosen sites. We are specifically interested in what out of hours provision will be provided by the Local Authority to enable good management of these locations?
- We note a number of the sites are adjacent to either A5 and / or A55 as such Child Safety will need to form part of any risk assessment to prevent egression onto these fast roads.

Nigel Harrison
Prif Uwcharolygydd Dros Dro - T / Chief Superintendent
Estyniad/Extension: 24440
Llinell Union/Direct Line: 01407 724440

1

Appendix 2

Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-19851-H4T5
Eich cyf/Your ref:

Llwyn Brain,
Ffordd Penlan,
Parc Menai,
Bangor,
Gwynedd.
LL57 4DE

Ebost/Email:
angharad.crump@cyfoethnaturiolcymru.gov.uk
Ffôn/Phone: 03000 655 232

Mr Mike Evans,
Uwch Swyddog Cynllunio,
Uned Polisi Cynllunio ar y Cyd
(Gwynedd a Mon)

13/06/2016

Dear Mr Evans,

Possible Temporary Stopping Places for Gypsy Traveller for Assessment

Thank you for consulting Natural Resources Wales (NRW) with regards to the above.

Please note that our comments are without prejudice to any comments we may wish to make when consulted on any subsequent strategy consultations or formal planning application/environmental permit application. At the time of any other consultation there may be new information available which we will need to take into account in making a formal response.

We have specific comments for each site below. In addition please refer to the 'Advisory comments' section at the end of the detailed comment that are applicable for each site.

Site 1 – Strip of land between A55 / A5 between Llanfairpwll and Star Crossroads

- *Flood Risk*

Part of this site is within zone C2 as per the Development Advice Maps accompanying TAN15: development & Flood Risk. The TAN suggests that highly vulnerable developments should not be permitted within a C2 zone. Your authority should refer to Section 6 of the TAN along with the *Dear Chief Planning Officers* letter from Welsh Government (http://gov.wales/topics/planning/policy/dear-cpo-letters/flood-risk-and-insurance-changes/?lang=en) which reinforces planning policy on flood risk along with what is required to be acceptable for highly vulnerable developments and flood risk.

This area has been subject to flooding previously from the adjacent Afon Braint; our flood zone maps indicate that part of the site is within zone 2 & 3. Our flood zone maps are based on a nationalised modelling technique.

We would suggest that should you be able to justify the location of the development (as per section 6 of the TAN), then detailed hydrology and hydraulic modelling should be carried out to establish the actual flood risk. The hydrology must include the catchment as a while which will include a watercourse diverted to accommodate the construction of the A55 trunk road at this location. The hydraulic modelling should include various flood event scenarios with sensitivity testing along with blockage scenarios on various culvert (railway culvert, A5 and the A55 culvert).

- *Main River*

This site runs adjacent to the Afon Brain, a main river. We would expect any formal application to include suitable pollution prevention measures and be agreed with Natural Resources Wales to ensure no contamination of the watercourse.

We advise that a flood risk activity permit may be required from as the work is to take near a main river. We can advise further on this matter should the proposed site be progressed and a FCA provided for our review.

- *Aquifers Typology*

This site is located within the Central Anglesey Shear Zone and Berw Shear Bedrock Topology Secondary B Aquifer.

Secondary Aquifers are rocks that can provide modest amounts of water, but the nature of the rock or the aquifer's structure limits their use. They support water supplies at a local rather than strategic scale (such as for private supplies) and remain important for rivers, wetlands and lakes. They have a wide range of water permeability and storage.

Certain types of proposed development within SPZ may have an inherent risk of pollution of potable water supplies e.g. underground storage of hazardous substances, sub-water table storage of pollutants, landfill sites and non-mains foul drainage systems.

Any proposed allocations for development within Principle and/or Secondary Aquifers may prove to be acceptable, however, the above examples of potentially polluting development should not be considered, unless it can be demonstrated that alternative acceptable sites are available.

We will therefore need to gain further details of the means of drainage disposal at the site in order to comment further on the acceptability of allocating this site.

Further information on the above and activities that put groundwater at risk can be found within Groundwater protection: Principles & Practice (GP3) Aug 2013.

Site 2- Parcel of land at Gaerwen Smallholding

- *Aquifers Typology*

This site is located within the Central Anglesey Shear Zone and Berw Shear Bedrock Topology Secondary B Aquifer.

Secondary Aquifers are rocks that can provide modest amounts of water, but the nature of the rock or the aquifer's structure limits their use. They support water supplies at a local rather than strategic scale (such as for private supplies) and remain important for rivers, wetlands and lakes. They have a wide range of water permeability and storage.

Certain types of proposed development within SPZ may have an inherent risk of pollution of potable water supplies e.g. underground storage of hazardous substances, sub-water table storage of pollutants, landfill sites and non-mains foul drainage systems.

Any proposed allocations for development within Principle and/or Secondary Aquifers may prove to be acceptable, however, the above examples of potentially polluting development should not be considered, unless it can be demonstrated that alternative acceptable sites are available.

We will therefore need to gain further details of the means of drainage disposal at the site in order to comment further on the acceptability of allocating this site.

Further information on the above and activities that put groundwater at risk can be found within Groundwater protection: Principles & Practice (GP3) Aug 2013.

Site 3 – Land adjacent to the A5 near Cymunod Farm, Bryngwran

- *Aquifers Typology*

This site is located within the Ordvician Rocks (undifferentiated) Bedrock Topology Secondary B Aquifer.

Secondary Aquifers are rocks that can provide modest amounts of water, but the nature of the rock or the aquifer's structure limits their use. They support water supplies at a local rather than strategic scale (such as for private supplies) and remain important for rivers, wetlands and lakes. They have a wide range of water permeability and storage.

Certain types of proposed development within SPZ may have an inherent risk of pollution of potable water supplies e.g. underground storage of hazardous substances, sub-water table storage of pollutants, landfill sites and non-mains foul drainage systems.

Any proposed allocations for development within Principle and/or Secondary Aquifers may prove to be acceptable, however, the above examples of potentially polluting development should not be considered, unless it can be demonstrated that alternative acceptable sites are available.

We will therefore need to gain further details of the means of drainage disposal at the site in order to comment further on the acceptability of allocating this site.

Further information on the above and activities that put groundwater at risk can be found within Groundwater protection: Principles & Practice (GP3) Aug 2013.

Site 4 – Land at former farm, off Cytir Road, Holyhead (South of Kingsland School)

- *Aquifers Typology*

This site is located within the South Stack Bedrock Topology Secondary B Aquifer.

Secondary Aquifers are rocks that can provide modest amounts of water, but the nature of the rock or the aquifer's structure limits their use. They support water supplies at a local rather than strategic scale (such as for private supplies) and remain important for rivers, wetlands and lakes. They have a wide range of water permeability and storage.

Certain types of proposed development within SPZ may have an inherent risk of pollution of potable water supplies e.g. underground storage of hazardous substances, sub-water table storage of pollutants, landfill sites and non-mains foul drainage systems.

Any proposed allocations for development within Principle and/or Secondary Aquifers may prove to be acceptable, however, the above examples of potentially polluting development should not be considered, unless it can be demonstrated that alternative acceptable sites are available.

We will therefore need to gain further details of the means of drainage disposal at the site in order to comment further on the acceptability of allocating this site.

Further information on the above and activities that put groundwater at risk can be found within Groundwater protection: Principles & Practice (GP3) Aug 2013.

- *Landscape*

The application site is located adjacent the Ynys Môn Area of Outstanding Natural Beauty (AONB).

We wish to remind you of your duty under Section 85 of the Countryside Rights of Way Act (2000) to have regard to the purposes of conserving and enhancing the natural beauty of the AONB.

Advisory comments relevant to all sites

We appreciate that this is an evaluation exercise and would therefore appreciate the opportunity to provide more detailed comments once site selection has taken place and once further information is available relating to site layout, overall design, means of disposing of surface and foul sewage etc.

In addition, where site lies within a publicly sewered area we recommend that you consult with Dwr Cymru in order to confirm if there is sufficient capacity within the Public Sewerage System to accommodate the increase in foul drainage, whilst remaining compliant with their environmental permit.

It is recommended that you consult with the Local Authority's Engineers Department in order to establish that should any surface water drainage from this site be discharged to a watercourse, ditch or culvert (excluding statutory main rivers) that such discharge will not cause or exacerbate any flooding in this catchment. Wherever practicable, Sustainable Urban Drainage Systems (SUDS) should be incorporated into the design.

We trust that the above is of assistance to you. We thank you for consulting with NRW. Please do not hesitate to contact us if we can be of any further assistance to you.

Our comments above only relate specifically to matters that are included on our checklist "Natural Resources Wales and Planning Consultations" (March 2015) which is published on our website: (https://naturalresources.wales/planning-and-development/planning-and-development/?lang=en). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests, including environmental interests of local importance. We advise that that developing these sites may require other permits/consents and that it is the applicants' responsibility to secure such consents/permits.

Yn gywir / yours faithfully

Angharad Wyn Crump MRTPI
Uwch Swyddog Cadwraeth / Senior Casework Officer
Gwasanaeth Cynhori Cynllunio Datblygu /
Development Planning Advisory Service

Appendix 3

Gwasanaeth Cynllunio Archaeolegol Gwynedd
Gwynedd Archaeological Planning Service

Craig Beuno/Ffordd y Garth/Bangor/Gwynedd/LL57 2RT Ffon.Tel 01248 370926 Ffacs.Fax 01248 370925 ebost. email ashley.batten@heneb.co.uk

4th July 2016

Our ref.: 0704ab01/StoppingPlaces

Nia Haf Davies
Uned Polisi Cynllunio ar y Cyd Gwynedd & Mon
Cyngor Gwynedd
Neuadd y Dref
Ffordd Gwynedd
Bangor LL57 1DT

Dear Mike,

Re: Possible Temporary Stopping Places for Gypsy Traveller for Assessment - Archaeological barriers to development

Further to you recent consultation on the above assessment, please find below detailed comments on the archaeological implications of development in the 5 sites identified:

Site 1 Land between Star and Llanfairpwll A5 and A55 – Minimal Restraint

The regional Historic Environment Record records one known archaeological site PRN 2702 in this area. A substantial ploughed out earthwork (possibly a medieval enclosure) was recorded here during the 1960s and although no longer visible, may survive below ground or have associated remains or deposits which survive in the locality. Archaeological mitigation would be required should this site be selected for development as a temporary stopping place.

Site 2 Gaerwen Smallholding – Major Restraint

This site is immediately adjacent (to the east) of Capel Eithin, a Scheduled Monument (reference number AN120). The monument is legally protected under the Ancient Monuments and Archaeological Areas Act 1979 and any impact on its setting is also a planning consideration. The monument is a multi-period site part excavated during the 1980s comprising Neolithic and later prehistoric occupation as well as Roman and early medieval activity including an extensive early Christian cemetery of 99 burials.

The Gaerwen Smallholding site holds significant archaeological potential and a staged programme of archaeological work would be required in order to determine whether any development on this site could be considered appropriate. Archaeological remains are thought to extend beyond the Scheduled area and any such remains would be considered nationally important. Additionally, any development at the Gaerwen Smallholding site is likely to impact on the setting of the nearby Scheduled Monument. This impact might be considered significant given the prominence of the monument within the landscape and the significance of views to the east, especially important in the context of an early Christian cemetery. Cadw would need to be consulted directly on this potential impact.

ASHLEY BATTEN

Gwasanaeth Cynllunio Archaeolegol Gwynedd
Gwynedd Archaeological Planning Service

Craig Beuno/Ffordd y Garth/Bangor/Gwynedd/LL57 2RT Ffon.Tel 01248 370926 Ffacs.Fax 01248 370925 ebost. email ashley.batten@heneb.co.uk

Gwynedd Archaeological Planning Service Responses to JLDP Candidate Sites

Archaeological Restraint	Archaeological Recommendation
None known	**No reason for not allocating in JLDP**
Minimal Restraint	Conditions may be placed on planning consent. **No reason for not allocating in JLDP**
Restraint	May require desk-based assessment prior to planning permission being granted. **No reason for not allocating in JLDP**
Fairly Significant Restraint	Will need archaeological evaluation prior to planning permission being granted. **Allocation could be included in JLDP but subject to results of archaeological evaluation.**
Significant Restraint	Extensive archaeological work will be required prior to any positive determination of any planning application. **If this site was to be included in JLDP archaeological evaluation would be required prior to its inclusion.**
Major Restraint	**The area should not be allocated in JLDP**

ASHLEY BATTEN *Planning Archaeologist*

Highways comments on Possible Temporary Stopping Places for Gypsy/ Travellers

Site 1 – Land between A55 /A5 between Llanfairpwll and Star crossroads

Although details of the site's access have not been presented, the Highways Authority would expect a minimum vison splay of 2.4metres x 215metres to be achieved so that the access would comply with national guidance. The site is within close proximity to the village of Llanfairpwll which has good public transport links. There is a bus stop close to the site with a footway located at the North West of the site which goes up towards the bus shelter.

The highway network leading up to the site is of good standard and could easily accommodate the additional use proposed.

This site is not in a location that can provide good footway links to Llanfairpwll or Gaerwen, and as the highway network is very busy with high speed traffic travelling along it, this may be detrimental to the safety of the users of the site should they wish to walk to the nearest village.

The site access must be designed, constructed and managed in such a way that visiting travelers are able to enter the site directly without having to stop or wait on the highway in order to open, or wait for, the gate to be opened. Such waiting or parking on the highway would be detrimental to road safety.

Site 2 – Parcel of land at Gaerwen smallholding

Following a site visit carried out by IOACC Highway officers on 31.3.2016 as part of the permanent sites assessment, the following comments were noted :-

It was deemed that the visibility splay adjoining the Unclassified Highway was sufficient. However, a section of vegetation/overgrowth situated within the highway boundary would need to be removed to restore visibility.

In order to ensure the free flow of two way traffic, a passing bay would need to be constructed between the existing field entrance and A55 overbridge.

With regards to transport links, there is no footway linking the proposed site to the village of Gaerwen and the nearest bus stop. We do not consider this being a sustainable option.

The site access must be designed, constructed and managed in such a way that visiting travelers are able to enter the site directly without having to stop or wait on the highway in order to open, or wait for, the gate to be opened. Such waiting or parking on the highway would be detrimental to road safety.

Site 3 – Land adjacent to the A5 near Cymunod Farm, Bryngwran

This existing access onto this parcel of land is from the unclassified side road leading from the A5 towards Cymunod. This access is substandard in terms of visibility, particularly to the right, where it is obstructed by the bend in the road and the abutment of the A55 overbridge. If this site is used, an alternative access would need to be considered. Unfortunately, the frontage onto the unclassified side road is too short to enable the access to be relocated to provide the required minimum visibility. The only other frontage is onto the A5, and as this is a Class 1 road, a minimum vision splay of 2.4 metres x 215 metres would be required in order to meet current guidance . However, due to the undulating nature of the vertical alignment of the A5 at this location, there is reduced forward visibility caused by blind brows and dips, which is signified by the existing double white line road markings. Given the nature of the topography here, it is unlikely that it would be possible to provide an access that would meet the minimum visibility safety requirements.

There are no footway or transport links nearby this site with the nearest bus stop located within Bryngwran and the nearest train station being located in Valley.

The site access must be designed, constructed and managed in such a way that visiting travelers are able to enter the site directly without having to stop or wait on the highway in order to open, or wait for, the gate to be opened. Such waiting or parking on the highway would be detrimental to road safety.

Site 4 – Land at former Farm, off Cyttir Road, Holyhead

The highway leading up to the site is very congested during peak times as parents are dropping off and picking children up from the nearby school in Kingsland. The additional traffic proposed with this use would exacerbate the situation to the detriment of highway safety and it's users.

The track leading to the site from the turning area at the end of the road is not currently a vehicular highway; it has been downgraded via a Traffic Order to restrict use to pedestrians and cyclists. If access is proposed along this track, there would be a need to review the current usage and provision would need to be made to segregate pedestrians/cyclists from the proposed vehicular use. The current Traffic order would need to be amended. It is likely that the existing road width would need to be increased.

The site is within close proximity to the centre of Holyhead Town which has excellent public transport links.

The site access must be designed, constructed and managed in such a way that visiting travelers are able to enter the site directly without having to stop or wait on the

highway in order to open, or wait for, the gate to be opened. Such waiting or parking on the highway would be detrimental to road safety.

Site 5 – Land at Tyddyn Lantern Farm – Holyhead

The site is access via a highway of approx. 6.3 metres wide. This is more than sufficiently wide for 2 commercial vehicles to pass with ease. There is also a footway link opposite the site which runs into the Town Centre.

The access proposed should have a minimum vision splay of 2.4 metres x 43 metres. To achieve this, the boundary will need to be reduced to a minimum 1.0 metres in height within the vision splay. The land is highway therefore a new retaining wall will need to be put in place, subject to structural design and approval.

The site is within close proximity to the centre of Holyhead Town which has excellent public transport links.

The site access must be designed, constructed and managed in such a way that visiting travelers are able to enter the site directly without having to stop or wait on the highway in order to open, or wait for, the gate to be opened. Such waiting or parking on the highway would be detrimental to road safety.

APPENDIX 5 - HIGHWAYS (DRAINAGE)

From: Kevin Dogan [mailto:KevinDogan@ynysmon.gov.uk]
Sent: 14 June 2016 12:06
To: Evans John Michael (Rh-CTGC)
Subject: Possible Temporary Stopping Places for Gypsies and Travellers. Our ref. 027.86.31

Mike,

I refer to your e-mail dated 6th June, 2016 and the attached location plans relating to the above enquiry.

I have now had the opportunity to review the potential sites and would comment as follows :-

a) **Map Number 1 - Land between the A5 and A55 between Star and Llanfairpwll.**

The proposal is within an area served by public sewers; however connection to the network may require installation of a pumped system.

The site is bordered to the east by a main river which is culverted under the A5; it is not known if the land I subject to flooding, but it would be advisable to consult with Natural Resources Wales to ascertain whether or not the field in question acts as a flood plain during extreme weather conditions.

Surface water run off should be directed to suitably designed soakaways, or alternatively a positive outlet could be provided to the watercourse.
Care should be taken to ensure that no land drainage systems or ditches are obstructed as a consequence of any works, while the culverting /diversion of any ditches would require formal consent under the Land Drainage Act.

b) **Map Number 2 - Gaerwen Smallholding.**

The site is beyond the sewered area and would have to be served by a non mains sewerage system.

There is no record of surface water flooding on this land; however, it would be advisable to consult with the landowner.

Surface water run off should be directed to suitably designed soakaways, or alternatively a positive outlet could be provided to the watercourse.
Care should be taken to ensure that no land drainage systems or ditches are obstructed as a consequence of any works, while the culverting /diversion of any ditches would require formal consent under the Land Drainage Act.

c) **Map Number 3 - Land adjacent to the A5 near Cymunod Farm, Bryngwran.**

The site is beyond the sewered area and would have to be served by a non mains sewerage system.

The land is bordered to the west by a watercourse and although there is no record of surface water flooding on this land, it would be advisable to consult with the landowner.

Appendix 6 - Regulatory Department

CYNGOR SIR
YNYS MÔN
ISLE OF ANGLESEY
COUNTY COUNCIL

Gypsy Traveller Sites

Consultation Response to Temporary Stopping Places for Gypsies and Travellers on Anglesey

June 2016

Status: Official Sensitive

Prepared by:

Sara Evans

Economic & Community Regeneration Service

1.0 Purpose of the Paper

1.1 The purpose of this paper is to provide comments from an Economic Development perspective on proposals for possible Temporary Stopping Places for Gypsies and Travellers on Anglesey, which is currently out to consultation.

1.2 Please see Annex A & B for further comments provided by the Planning & Environmental Health sections.

1.3 This paper will also provide a summary and conclusion in terms of the section's views for the sites, along with some recommendations.

1.4 In formulating this response the Economic Development section is accepting that the site selection criterion formulates the base line, particularly with regard to the locational requirements.

2.0 Background

2.1 The Housing (Wales) Act 2014 places a duty on Local Authorities to provide sites for Gypsies and Travellers where a need has been identified.

2.2 Following the first consultation in March 2016, the Executive accepted a recommendation that none of the proposed Temporary Stopping Places considered in the consultation should be pursued further. Further work has taken place to identify possible locations for the Temporary Stopping Places and as a result, a shortlist of sites has been drawn up and is now part of this consultation.

SITE	Comments
Site 1 - Strip of land between A55 / A5 between Llanfairpwll & Star Crossroads	• The Economic Development section is supportive in principle - no major Economic Development issues envisaged.
Site 2 - Parcel of land at Gaerwen smallholding	• The Economic Development section expresses concerns due to its proximity to the £20m Menai Science Park development which could have negative impacts (visually) on the scheme..
Site 3 - Land adjacent to the A5 near Cymunod Farm, Bryngwran	• The Economic Development section expresses concerns with this site as local businesses with property of high value are located in close proximity to the proposed site. • Hitachi have also identified a potential site nearby for a Park & Ride facility, linked to the Wylfa Newydd development. A temporary stopping place for gypsies and travellers near this site would expect to have impacts on this proposal.

Site 4 - Land at former farm, off Cyttir Road Holyhead (South of Kingsland School)	• The Economic Development section expresses concerns with regards to the proximity of the site to the Parc Cybi and Penrhos Enterprise Zones as it would be likely to have a major negative impact on future developments from expected energy investments. • The Penrhos Industrial Estate nearby is also significant and in terms of employment numbers and businesses, is also a very important location. The site is recognised and considered as a 'business hub' acknowledged though securing its Enterprise Zone status.
Site 5 - Land at Tyddyn Lantern Farm, Holyhead	• The R&ED Service expresses concerns with regards to the proximity of the site to businesses located at Holyhead Fish Dock.

3.0 Conclusions & Recommendations

3.1 For the reasons outlined above, the Economic Development section is of the opinion that the parcel of land at the former farm, off Cyttir Road Holyhead (South of Kingsland School) is not a suitable location for a Gypsy Traveller site.

3.2 By locating the temporary stopping sites for gypsy and travellers next to significant employment land, this has the potential to affect the Island's future prosperity considerably and risks damaging Anglesey's Energy Island aspirations.

3.3 There are concerns with the site at Gaerwen, adjacent to the A5 near Cymunod Farm Bryngwran and the two sites at Holyhead and it is recommended that these are addressed before the sites can be considered any further.

Annex A
Planning Section Response

4.0

SITE	Comments
Site 1 - Strip of land between A55 / A5 between Llanfairpwll & Star Crossroads	• Countryside location visible from the adjoining A5. No planning objections in principle but landscape mitigation would need to be incorporated.
Site 2 - Parcel of land at Gaerwen smallholding	• Countryside location, no planning objections in principle but less favoured than site 1 due to elevated location and potential for wider landscape impact. Landscape mitigation would need to be incorporated.
Site 3 - Land adjacent to the A5 near Cymunod Farm, Bryngwran	• Countryside location visible from the adjoining A5: no planning objections in principle but landscape mitigation would need to be incorporated.
Site 4 - Land at former farm, off Cyttir Road Holyhead (South of Kingsland School)	• 'Legibility' of access to site is difficult. Within the Area of Outstanding Natural Beauty (AONB) and close to Public Footpath. AONB designation not fatal given the site context but route/integrity of footpath would need to be protected. • The Ynys Mon Local Plan (development plan) allocates the site partly for 'Employment' and 'Physical Infrastructure and Environmental Proposals', the Stopped Unitary Development Plan allocates the site for 'Employment' and the emerging Joint Local Development Plan as an 'Employment' site. • From a planning perspective this site is the less favoured of the two in Holyhead.
Site 5 - Land at Tyddyn Lantern Farm, Holyhead	• There is a Public Footpath at the boundary of the site and its route/integrity needs to be protected. The site is not allocated in the Ynys Mon Local Plan; however there is potential conflict at this site with the Stopped Unitary Development Plan that allocates the site for 'Employment' and the emerging Joint Local Development Plan as an 'Employment' site. • At this point in time this would be the more favoured site in Holyhead. However once the Joint Local Development Plan is adopted there will be conflict with the 'development plan' and the choice of site will need to be fully justified.

4.1 There are also general comments that are germane to all sites which may not be controllable under 'planning' legislation, but nevertheless need to be factored in at this stage:

- Occupation: How will adherence to the maximum periods regarding length of stay (and no right to return periods) be managed/enforced?

- Maintenance: How will the sites be maintained to ensure that they do not become an eyesore e.g. will portable toilets/refuse bins be removed during periods of non-occupancy?

- Security: How will access and use of sites be controlled throughout the year to ensure that inappropriate/unauthorised uses do not take place?

4.2 It should also be noted that no reference is made within the consultation document to the provision of artificial lighting at the sites. If this is proposed then this potential additional landscape impact needs to be taken into account.

Annex B
Environmental Health Section Response

5.0

SITE	Comments
Site 1 - Strip of land between A55 / A5 between Llanfairpwll & Star Crossroads	• This site does not have any immediate neighbouring properties – no access issues.
Site 2 - Parcel of land at Gaerwen smallholding	• This site does not have any immediate neighbouring properties – no access issues.
Site 3 - Land adjacent to the A5 near Cymunod Farm, Bryngwran	• This site has a confined boundary between the A5 and A55 roadway and has no immediate residential neighbours. Both these factors should assist in minimising some of the potential environmental impacts that can arise from the use of such sites.
Site 4 - Land at former farm, off Cyttir Road Holyhead (South of Kingsland School)	• This location is only accessible via a stopped up road former Trefignaeth Rd which would involve traffic passing a primary school and residential housing estate and could possibly cause congestion and additional traffic issues. • The road, although stopped up, is used by residents of Kingsland as a direct pedestrian route to Penrhos Retail Park. The stopped up road is considered to pose amenity issues as it could be used as a fly tipping area and may also provide possible overflow parking for any travellers who could be accommodated on the site. • The close proximity of residential properties and a primary school increases the likelihood of complaints of nuisance / pollution were there to be instances of non-compliant behaviour such as burning or noise from the site. • Late night / early departures of travellers using the Irish Sea crossing could cause added disturbance.
Site 5 - Land at Tyddyn Lantern Farm, Holyhead	• This site appears to have some separation (in the form of industrial developments) from the nearest residential property which could serve as a buffer against potential problems. However, the site must be approached via residential housing areas which could pose some traffic noise issues, particularly from night time arrivals or early departures.

	• The restrictive width of Turkey Shore Rd is also problematic at times, caused by traffic and shuttle buses using the long stay Port car park. The site is in close proximity to a Community Centre playing area and prime amenity of Peibio Fields and the Coastal and Wales Coast Path which may have a detrimental amenity impact. • The location of the site has a route of access with numerous additional parking opportunities which have the potential to provide additional overflow places in the event the site is full. This may cause traffic impacts for local residents and ferry travellers. • The additional availability of off highway space around the dock areas around the site, may in itself provide areas around the site for the build-up of general clutter or fly tipping which may potentially be brought to the area by travellers. This would give rise to general amenity issues to local residents and Port users.

APPENDIX 7

TRANSLATION

From: Bodedern Community Council

29 June 2016

Dear Sir/Madam

I write on behalf of Bodedern Community Council with regard to your proposal to use land adjacent to Cymunod Farm, Bryngwran as a temporary stopping place for gypsies and travellers. Although we understand that you are required to provide a suitable location, we wish to formally object to the proposed used of this land for the following reasons:

Traffic

The traffic in this area is substantial – it is on the main road between Bodedern and Bryngwran and provides access to the A55. The substantial increase in traffic during the development of the site and following its completion with towing vehicles having to slow down to turn, renders this road unsuitable for this use.

Cost

We wish to express most strongly that since you own one of the three sites currently under consideration, it would be completely senseless to purchase another piece of land for this purpose. You have a responsibility and a duty of care to the electors of Anglesey to ensure value for money for the ratepayers who will be funding this project. Without a doubt, it would not offer value for money for the ratepayers when the council already owns another site.

Also, there is a possibility that "Compulsory Purchase Legislation" would have to be used in order to acquire one of the two sites and that would immeasurably damage the council's reputation and the gypsies and travellers who would use the site and in addition, the council would face hefty legal fees. In moving forward, it is vital that a positive relationship develops between the residents of these sites and the local community. If the Council bought this land through compulsory purchase, it would seriously damage this relationship, the community would definitely rally around the individual who would lose his/her land and it would leave a legacy of distrust which would have an adverse effect on all parties involved for generations. Obviously, this is not the way to build a mutually constructive and beneficial relationship.

Adjacent Use

We also object to this particular site due to its proximity to commercial properties. Your consultation document clearly states that sites should not interfere with adjacent businesses and there is no doubt at all that the development of this site would have a substantial negative effect on the businesses. The insurance broker of one business made a very clear statement that should this site be developed as a temporary stopping place, the public indemnity insurance would be invalid. A number of the contracts awarded to this business by clients in the public and private sectors note that public indemnity insurance is essential and failure to secure that would inevitably lead to loss of contracts and, ultimately, would make it impossible for the business to continue to trade. This unfortunate effect in itself should be reason enough to deem the site unsuitable.

There are other businesses to be taken into consideration which are very close to the site, i.e. Cartio Môn and Gwyddfor Residential Home and the two would certainly suffer the same negative effects as the previously mentioned business. At present, Gwyddfor is a residential care home for the elderly and disabled who benefit greatly from the peace and quiet of their current location. There is no doubt that the proximity of this site would upset many of the residents and cause stress to some of the most vulnerable people in our community. They deserve peace of mind in their twilight years and this development should not interfere with that.

Environmental Issues

This piece of land is located between the A5 and the A55 and any residents on this site would suffer substantial noise nuisance from the roads, particularly the A55 which has high volumes of traffic day and night which is a material consideration in view of the insulation levels provided in the caravans which would be located on this site.

There are two water courses and a settlement pond on this site which appear to be hydraulically connected to the Crigyll river. No development should be permitted on this site in order to prevent any pollution downstream and, assuming that a buffer zone of approximately 10m would be provided, the site would be reduced substantially, particularly given its linear nature. Once again, these considerations make the site totally unsuitable.

The residents of Bodedern have considered these points carefully and have arranged a petition expressing their strong objection for the above reasons. I respectfully ask that you consider the petition in accordance with the above objections.

On behalf of Bodedern Community Council, I urge you to consider the above points very carefully and I would like to thank you for your consideration.

Yours faithfully

R A Jones

Chairman – Bodedern Community Council

Appendix 8

TRANSLATION OF CORRESPONDENCE FROM LLANFIHANGELESCEIFIOG COMMUNITY COUNCIL

Strategic Housing & Development Manager
Anglesey County Council
Council offices
LLANGEFNI

Dear Sir / Madam,

Re: Response to Consultation Questionnaire regarding Temporary Stopping Places for Gypsies and Travellers in Anglesey

I refer to a meeting we had on Tuesday evening, 28th June 2016 with members of the above Council in which Dr. Gwynne Jones, Chief Executive of the County Council, County Councillor Aled Morris Jones and Mr. Dafydd Rowlands, Head of the Housing Department were present. Dr. Gwynne Jones gave a presentation to members on the contents of the document and members had the opportunity to ask relevant questions and a brief discussion ensued concentrating on **Site 2, a parcel of land in a smallholding in Gaerwen.** I would therefore like to respond on behalf of the Community Council **which was unanimously opposed to the site.**

1. It was felt that the access to the site was not suitable given its proximity to the busy junction of the A55 / A5 as well as a rural road and therefore the high score given to the site must be questioned. Also, the site enjoys excellent views of the area and the mountains of Snowdonia in the background and therefore what message and reasons lie behind this decision to spoil what we have here on the Island.

2. It was also felt that there was no consistency in the scoring and there is evidence that scoring is based on the views of an individual/individuals as opposed to national guidelines and therefore the consultation on any site in question is flawed and weak.

3. It was felt that consideration should have been given to an adjoining site near the Penhesgyn site so as to ensure a central location.

4. Problems with the land's sewerage / water system - Gaerwen has suffered flooding problems recently and the intention of establishing on-site water tanks could also lead to poisoning.

5. Is reported that the site is level pasture ground but there is no mention that the site is good agricultural land where animals have been grazing and the consultation paper gives the impression that this fact has been ingored, with a high score again being given to the site. Given what has happened on the Science Park land, it has not been considered that the site could be of historic and archaeological interest. Consideration will also have to be given to

screening the site as it is directly above the A55 and is clearly visible to those travelling on the A55. Another example of why it should not be located here.

6. There is nothing definite in the consultation paper to ensure that the site will be constantly managed.

7. There is uncertainty and ambiguity about the period for which the travellers are permitted to stay and also therefore regarding the level of use of the site.

8. We have evidence that the Science Park has already considered the land in question and that the County Council's planning department had said that planning permission could not be secured for the site because it is too far from the village settlement. It is surprising therefore that the Council can accept and adopt the site in terms of planning (clause 4.1 of the consultation document).

9. Finally and importantly, the fact that the Science Park is located directly opposite the site is a totally valid point and the consultation paper should not have disregarded that fact and should not have scored the site highly, i.e 3.5. Several neighbours in Gaerwen have opposed the Park strongly and locating a Gypsy site on adjacent land could do great harm and make it harder for them to attract significant investment if there is a gypsy and traveller site nearby. If this site is chosen, it will be an expensive process and a waste of time for everyone. Having a site in this location would mean the travellers having to walk through the Park and the owner would not like to see this happen for reasons that are patently obvious.

Yours faithfully

Alun Foulkes

J AlunFoulkes

Clerk

Appendix 9 Bangor University

TRANSLATION

From: Bangor University

27 June 2016

To: Housing Strategy and Development Manager

Consultation on Temporary Stopping Places on Anglesey for Gypsies and Travellers

I refer to the above consultation.

The University and M-Sparc have already expressed concerns regarding the effect of any such development in the vicinity of the M-Sparc Science Park in Gaerwen - on the plan to develop the Science Park. I would refer you to, and remind you of, my letter dated 8 March 2016 and the letter dated likewise from M-Sparc in response to the previous consultation.

These deep concerns are also relevant to the current consultation with regard to temporary sites. The Gaerwen site (Site 2) in the consultation is very close to the site of the Science Park.

I therefore emphasise that such a development would have a disastrous effect on the M-Sparc project and the aim to establish a successful Science Park of international repute.

In considering the methodology used to score the various sites, the University is of the opinion that the methodology and process were not suitable. The University feels strongly that not nearly enough consideration was given to the effect of the development on the area's economy. And although 'Adjacent Use' has been taken into consideration, it does not reflect the importance of this matter. Not enough weight has been given to this aspect. In the University's opinion, this matter should have a "pass/fail" criterion since it is so important and Site 2 would have failed the test.

In addition, I do not feel that the score given under criterion 2 "Adjacent Use" for Site 2 is correct at all – it does not reflect the adverse effect on the Science Park. According to the report "No residential properties or businesses close to the site. The Science Park will be several hundred metres away" – this is no reflection of the effect on the Science Park. I also note that the boundary of the Park's site is within 100m of Site 2.

The University therefore reiterates our very serious concerns regarding this site and implores the Council not to give any further consideration to the site based on the reasons noted above.

Yours sincerely

Dyfan Roberts - Director of Property and Campus Services

Appendix 10 SPARC

TRANSLATION

From: M-Sparc

14 June 2016

Dear Friend

CONSULTATION: GYSPY AND TRAVELLER SITES ON ANGLESEY

You will recall that I contacted you in March this year in response to the Council's consultation on the proposal to provide a permanent site for gypsies and travellers on land in your ownership in Gaerwen. Following the consultation, the Council resolved not to proceed with that proposal.

However, the Council has now announced a further consultation, this time for Temporary Stopping Places and the Gaerwen site (site 2) is one of the sites included in the consultation. We are extremely disappointed that this site has been included again. Although the proposal this time is for a temporary site, the reasons for our objections the first time are just as valid.

We note that the consultation document refers to the need for a site for 15 caravans (2.2.1). The meaning of 'temporary' site is not at all clear. In paragraph 3 under the heading 'Temporary Stopping Places' reference is made to travellers stopping for a short period of time up to a maximum of 28 days. In paragraph 4.2, reference is made to travellers who set up encampments for 'several weeks'. And then in paragraph 5.1.7, it is stated that travellers would be permitted to stay for up to a fortnight in any four month period, i.e. a maximum of 6 weeks per annum. In our opinion, this ambiguity clouds the consultation because we do not know for certain how much use will be made of the site.

In our original letter, we referred as follows to the planning status of the site:-

> **When we were considering a site in Gaerwen originally, we had asked the County Council to give consideration to the land which is now being considered as a permanent site for gypsies and travellers. The council's planning officers made it very clear to us that we would not be able to obtain planning permission on the site, as it is too far from the village settlement. Indeed, it was the Council that directed us to our current site, saying that it was more suitable for development. It was to our great surprise, therefore, when we were given to understand that the council (clause 4.1 in the document) anticipated that the site could now be acceptable from a planning perspective.**

We believe that the same reasons are valid in the case of a temporary stopping place. In addition to the above reasons, it could be stated that the site is in a very exposed part of the landscape.

The Council's Economic and Property Departments will be aware that we considered three sites on the island before deciding on a site for M-Sparc including Tŷ Mawr in Llanfairpwll and Lledwigan in Llangefni. One of the reasons we decided on the Cefn Du site was that fact that we were confident, at the time, that we could develop our project in a location where we could establish the vital 'ethos' of a Science Park, i.e. an open site in parkland which would attract major investors. We sought assurance that no other development in the area would interfere with, or have an adverse effect on our proposal and we were given that assurance.

The great fear is that it will now be more difficult to attract major investors if a site for gypsies and travellers was established here since rural and quiet areas are more attractive to them from a security point of view. The appeal would be significantly reduced if a permanent or temporary site was established in close proximity.

We are at a critical stage in the development of the park with regard to the work which needs to be carried out on the access and the landscaping. We are very eager to ensure that the park is as open as possible to the local community and to provide a footpath from the village to the site along with seating areas and a small garden. We have also come to an understanding regarding the level of security which will be required on the site. Having a site so close to the development would force us to rethink the security levels and how open the site could be. Restricting the community from coming to the site would be a severe blow to us and the local community.

In response to the points noted in paragraph 6 of the consultation:-

Ownership and Availability: We are surprised that the Council is placing so much emphasis on the fact that this land is in Council ownership. The suitability of the site should be the determining factor not the owner.

Environment: We are surprised that the Councils says 'perhaps noise from the traffic on the A55 will be a problem'. Traffic noise will be a problem as the site is immediately above the A55. Costly screening work would need to be done in order to alleviate the noise problem.

Accessibility: It is understood that the site needs to be in close proximity to shops and facilities (1.6.3). It is an inaccessible and dangerous site for pedestrians as the A55 must be crossed using an overhead bridge and there is no pavement on a large part of the road to reach the facilities in Gaerwen. Public transport cannot be accessed without making the same journey.

Adjacent Use: The Council implies that the Science Park is some hundreds of metres away. That is not factually correct. The only way to get to the facilities in Gaerwen is past the main entrance to the Park and along the pavement to the village where the proposed footpath to the park will be located. In all likelihood, the road and the park's footpaths will be used as a short cut to the village. It would be disappointing to see a temporary site close to a designated enterprise zone.

As before, M-Sparc strongly objects to the proposal to establish a temporary site in Gaerwen. In our opinion, it would have an adverse effect on our plans to establish a successful Science Park and would make it almost impossible to develop the 'ethos'. Establishing a site in such close proximity would reduce the value of the Park significantly and there is a real risk that we would have to re-think our plans for the site.

We look forward to hearing from you with your response to our comments.

Yours sincerely

Professor John G Hughes PhD FBCS FLSW, Chairman of Menai Science Park Ltd

Ieuan Wyn Jones LLB – Executive Director of Menai Science Park Ltd

APPENDIX 11

EMAIL FROM DWR CYMRU

From: Griffiths Dewi [mailto:Dewi.Griffiths@dwrcymru.com]
Sent: 16 June 2016 11:01
To: Evans John Michael (Rh-CTGC)
Subject: Anglesey Consultation June 2016

Dear Mr Evans

Please find Welsh Water's representation on the June 2016 consultation on Temporary Stopping Places for Gypsies and Travellers. I have also submitted these comments via the online questionnaire.

Temporary stopping place, centre of Anglesey:

Site 1 – A5/A55 Star/Llanfair PG

- 90mm & 9" water main nearby. No issues with water supply.
- 150mm sewer approx. 70 metres to the west of the site.
- No issues in accepting the flows at Llanfairpwll WwTW.

Site 2 – A5/A55 Gaerwen

- Closest water main is approx. 500 metres away in Gaerwen on the other side of A55. Welsh Water would not support the laying of new water mains across the A55. Alternative water main located 700 metres to the north of the site, new water mains would be needed to make a connection.
- Closest public sewers approx. 750 metres away, in Gaerwen, on the other side of the A55 therefore non-mains sewerage would be required.

Site 3 – Adjacent A5 Bryngwran

- 12" water supply nearby. No issues with water supply.
- Closest public sewers approx. 800 metres away therefore non-mains sewerage would be required.

Temporary stopping place, Holyhead:

Site 4 – Off Cyttir Road, Holyhead

- 110mm water main nearby. No issues with water supply.
- 150mm sewer approx. 120 metres north-west of the site.
- No issues in accepting the flows at Holyhead WwTW.

Site 5 – Tyddyn Lantern Farm, Holyhead

- 110mm water main nearby. No issues with water supply.
- 1800mm sewer located just outside the site.
- Rising main sewer crossing the site near its southern boundary. Welsh Water has rights of access to its assets at all times. Where we have sewers/water mains crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion of the asset.
- No issues in accepting the flows at Holyhead WwTW.

The following points are applicable to all sites:

- Where there are no public sewerage facilities available in close proximity to sites the use of non-mains sewerage may be required. In such cases the provisions of Circular 10/99 "Planning Requirement in respect of the Use of Non-Mains Sewerage in New Development" apply and consultation with Natural Resources Wales would be required.

- Water mains and/or sewerage required for any potential development can be acquired through the requisition provisions of the Water Industry Act 1991 (as amended). The benefit to a developer of being able to use the requisition process is that the cost of a scheme is offset by the income generated to Welsh Water through customer bills from the development over a period of 12 years. Should the income that Welsh Water receives be greater than the cost of the scheme, then there is a nil contribution from the developer. Conversely, should the income received fall short of the scheme cost, a developer would be required to make up the shortfall.

  The information contained within the consultation document suggests that the number of caravans/pitches to be accommodated is fairly low, as such the income received by Welsh Water from these sites is unlikely to substantially offset the cost of laying the distance of watermains/sewers that may be needed to connect some of the proposed sites to the network. As such the cost of laying services to serve those sites furthest away from the network may prove to be prohibitively expensive.
  (Please note that improvements to the sewerage network, laying of new sewers, water mains etc can benefit from requisition, but improvements to WwTWs cannot).

- Welsh Water has rights of access to its assets at all times. Where we have sewers/water mains crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion of the asset.

Regards
Dewi Griffiths

Dewi Griffiths
Forward Plans Officer | Developer Services | Dwr Cymru Welsh Water
Kinmel Park Depot | Royal Welch Avenue | Bodelwyddan | Denbighshire| LL18 5TQ |
0800 9172652

APPENDIX [illegible] LONGLIST OF SITES FOR TEMPORARY STOPPING PLACES

Location	Accessibility	Comments on accessibility	The Site	Comments on the Site	Environment	Comments on environment	Availability	Comments on availability	Adjoining usage	Comments on adjoining usage	Total Score
Smallholding land immediately North of A55 Junction 7, Gaerwen	4	Access onto A5152 leading immediately to junction with A55	3.5	Level site currently pasture. Suitable site access available.	3.5	Some traffic noise from A55.	4	Council ownership	3.5	No residential or business properties in close proximity. Science Park to be located across A55 - not adjoining.	18.5
Land between A55 and A5 West of Llys Meirion, Star	3	Direct access onto A5. Junction of A55 less than 2 miles.	3.5	Level site. Currently Overgrown. Site level with road	3	Traffic noise.	2	Private ownership	2	Residential properties adjacent or overlooked.	13.5
Land between A55 and A5 immediately West of Llys Meirion, Star	3	Direct access onto A5. Junction of A55 less than 2 miles.	3.5	Level site. Currently Overgrown. Site level with road	3	Traffic noise.	2	Private ownership	2	Residential properties adjacent or overlooked.	13.5
Land between A55 and A5 East of Star Crossroads	3	Direct access onto A5. Junction of A55 less than 2 miles.	3.5	Level site. Currently Overgrown. Site level with road	3	Traffic noise.	2	Private ownership	3	Residential properties less than 400m. No properties overlooked.	14.5
Land between A55 and A5 East of Star Crossroads	3	Direct access onto A5. Junction of A55 less than 2 miles.	3.5	Level site. Currently Overgrown. Site level with road	3	Traffic noise.	2	Private ownership	3	Residential properties less than 400m. No properties overlooked.	14.5
Land between A55 and A5 East of Star Crossroads	3	Direct access onto A5. Junction of A55 less than 2 miles.	3.5	Level site. Currently Overgrown. Site level with road	3	Traffic noise.	2	Private ownership	3	Residential properties less than 400m. No properties overlooked.	14.5
Land South of A5 and East of Star Crossroads	3	Direct access onto A5. Junction of A55 less than 2 miles.	3	Level site. Currently pasture. Slight drop in level from road to land.	2	Traffic noise and safety issues as adjacent to railway line	2	Private ownership	3	Residential properties less than 400m. No properties overlooked.	13
Land South of A5 and East of Star Crossroads	3	Direct access onto A5. Junction of A55 less than 2 miles.	3	Level site. Currently pasture. Slight drop in level from road to land.	2	Traffic noise and safety issues as adjacent to railway line	2	Private ownership	3	Residential properties less than 400m. No properties overlooked.	13
Land South of A5 and East of Star Crossroads	3	Direct access onto A5. Junction of A55 less than 2 miles.	3	Level site. Currently pasture. Slight drop in level from road to land.	2	Traffic noise and safety issues as adjacent to railway line	2	Private ownership	2	Residential properties adjacent or overlooked.	12
Land South of A5 and East of Peninsula Windows, Star Crossroads	3	Direct access onto A5. Junction of A55 less than 2 miles.	3	Level site. Currently pasture. Slight drop in level from road to land.	2	Traffic noise and safety issues as adjacent to railway line	2	Private ownership	2	Residential properties adjacent or overlooked.	12
Land South of A5 and West of Peninsula Windows, Star Crossroads	3	Direct access onto A5. Junction of A55 less than 2 miles.	3	Level site. Currently pasture. Slight drop in level from road to land.	2	Traffic noise and safety issues as adjacent to railway line	2	Private ownership	2	Residential properties adjacent or overlooked.	12
Land South of A5 and East of Parrys Furniture, Star	2	Direct access onto A5. Safe access may be impacted by bend in road near site. Junction of A55 less than 2 miles	3	Level site. Currently pasture. Slight drop in level from road to land.	2	Traffic noise and safety issues as adjacent to railway line	2	Private ownership	2	Residential properties adjacent or overlooked.	11
Land South of A5 and East of Parrys Furniture, Star	2	Direct access onto A5. Access would need to be via business units land. Junction of A55 less than 2 miles	3	Level site. Currently pasture. Slight drop in level from road to land.	2	Traffic noise and safety issues as adjacent to railway line	2	Private ownership	2	Adjacent business properties.	11
Bwlch Gwyn Quarry, Gaerwen	2	Approx from1.5 miles from A55 junction but access would be made via narrow lane and via the village of Gaerwen.which could issues.	4	Hardstanding in place. Fencing would be required. Existing access onto site.	3	Old quarry site which could present Health and Safety issues. Quiet environment.	1	Enquiry to owner made. Told not available as currently leased and	3	Not directly adjacent to residential properties but are several in vicinity.	13

Location	Accessibility	Comments on accessibility	The Site	Comments on the Site	Environment	Comments on environment	Availability	Comments on availability	Adjoining usage	Comments on adjoining usage	Total Score
Land adjacent to Bwlch Gwyn Quarry, Gaerwen	2	Approx from1.5 miles from A55 junction but access would be made via narrow lane and via the village of Gaerwen.which could issues.	3	No hardstanding. No existing access onto site	3	Near to old quarry site which could present Health and Safety issues. Quiet environment.	1	Private ownership	2	Adjacent to a few residential properties.	12
Land on Eastern boundary within Anglesey Showground	3	Access direct to A5 with junction to A55 approx 3 miles.	2	Liable to flood - marshy la	3	Limited road noise. Noise from aircraft.	2	Private ownership	2	Adjacent Anglesey Showground. Mona airfield directly across road. Businesses at Mona Industrial estate in vicinity.	12
Land immediately East of Gadlys, Tollgate, Gwalchmai	2.5	Access direct to A5 . Likely access to A55 would be via Gwalchmai to A55 junction approx 2 miles	3.5	Level, Not cultivated	3.5	Limited road noise.	2	Private ownership	2	Several residential prpoerties adjacent.	13.5
Land immediately to the rear and West of Ty Newydd, Tollgate, Gwalchmai	2.5	Access direct to A5 . Likely access to A55 would be via Gwalchmai to A55 junction approx 2 miles	3.5	Level, not cultivated	3.5	Limited road noise.	2	Private ownership	2	Several residential prpoerties adjacent.	13.5
Land between A55 and A5 North of Cymunod Farm, Bryngwran	3.5	Straightforward access onto A5 and approx 1 mile from A55 junction	3.5	Level, screened from A55	3	Road noise from A5 and A55	2	Private ownership	3	Directly adjacent A55. Residential properties not directly adjacent but further down access lane	15
Land South of Dalar Hir, Bodedern	3.5	Layby which accesses direct onto A5 and close to Dalar Hir A55 junction.	3.5	Some existing hardstanding but additional pasture would require hardstanding creating	3	Road noise from A5 and A55	2(?)	Partial private ownership	4	Directly adjacent A55. No business or residentail properties immediately adjacent.	16
Land East of Heulfre, Caergeiliog	3.5	Easy access to junction with A55.	2.5	Small (perhaps6 caravans), pasture. Proximity to drainage pond	3	Road noise from A5 and A55	2	Private ownership	4	Directly adjacent A55. No business or residentail properties immediately adjacent.	15
Land adjacent and West of Gwaelod Bach, Caergeiliog	3.5	Easy access to junction with A55.	3	Pasture	3.5	Limited road noise.	2	Private ownership	3	Adjacent ruined property. Further residential properties back from other side of road.	15
Land opposite and South of Cerrig Baban, Caergeiliog	3.5	Easy access to junction with A55.	3	Pasture	3.5	Limited road noise.	2	Private ownership	3	Residential properties back from other side of road.	15
Land East of Bryn Ednyfed, Caergeiliog	3.5	Easy access to junction with A55.	3	pasture	3.5	Limited road noise.	2	Private ownership	2.5	Residential properties across adjcent fields.	14.5
Property North of Dol Eithin, Caergeiliog (Llanfihangel Yn Nhowyn)	2.5	Access via single track onto Minffordd Road to nearby junction of A55.	3	Old factory with hardstanding around. Building would have to be made safe and secure	3	The old factory site would have potential health and safety issues.	2	Private ownership	2	Adjacent to residential housing estate.	12.5
Land at Cyttir Road, Holyhead (South East of Kingsland School)	1	Access via narrow lane to one side of Kingsland School. Work would be needed to improve access, subject to Highways approval.	4	Flat site.	4	Few environmental concerns.	3	Private ownership	2	Access means passing residential dwellings and school.	14
Fish dock, Turkey Shore Road, Holyhead Port	3.5	Access to Ferry terminal via narrow but quiet road.	4	Hardstanding and existing boundaries in place. Existing access from road.	2	Close proximity to edges of dock is a concern from Health and Safety perspective.	2	Leased by IACC but lease in process of being given up.	3	Business operate from units near the site. No residential dwellings in close proximity.	14.5

Location	Accessibility	Comments on accessibility	The Site	Comments on the Site	Environment	Comments on environment	Availability	Comments on availability	Adjoining usage	Comments on adjoining usage	Total Score
Tyddyn Lantern, Ffordd Tudur, Holyhead	3.5	Access to Ferry terminal via narrow but quiet road.	2	Steep gradient may make creation of access to site problematic. Ground is only level in parts. Rocky outcrops.	3	Generally suitable but not far from dock which may raise health and safety concerns.	2	Private ownership	3.5	On basis of using bottom corner of the plot which is furthest from homes/ community centre at top of rise.	14

Consultation on Temporary Stopping Places for Gypsies and Travellers on Anglesey - 2 June - 1 July 2016

Mark J Inwood
Mob: 07961 351 032
email: mark.inwood@hotmail.com
Orsedd Newydd, Star, Anglesey LL60 6AY

13 June 2016

Dr. Caroline Turner
Assistant Chief Executive
Isle of Anglesey County Council
Council Offices
Llangefni
LL77 7TW

Dear Caroline,

Many thanks for the opportunity to discuss the above consultation on Thursday 9th June. As promised, please find below the points we discussed together with some proposed recommendations. Please note, although I make specific reference to Site 1 (The strip of land between A55/A5 between Llanfairpwll and Star Crossroads), the majority of the points listed herein relate to all proposed sites. All the recommendations relate specifically to points on Policy, Assessment Process and Risk Assessment.

I fully understand and appreciate that you and your team have engaged in a huge amount of work. However, there are a number of significant principle points that require addressing to ensure, as far as reasonably practicable, that the correct site and facilities are progressed to support the Gypsies/Travellers and the residents of the Isle of Anglesey. The following points are raised without prejudice and in relation to the published planning policy adopted by Anglesey County Council.

1) Policy - Topic Paper 18/18(A): Identifying Gypsy and Traveller Sites

The policy defines the assessment methodology to be used on the proposed sites. Provided it is followed correctly it should provide Anglesey and the Gypsy/Travellers with appropriate site options and site requirements. This approach also supports the commitments of the Joint Development Plan and ultimately the requirements of the Housing (Wales) Act 2014.

The topic paper sets out a number of criteria for the initial site filter and subsequent detailed site assessments. These assessments require to be part of the consultation documentation process to enable and support key decisions on the appropriateness of each site.

The key points on Policy:

1.1 The Initial Assessment of Sites:

1.1.1 The Welsh Government Statuary Guidance states "*that if a location is considered inappropriate for residential use then it should not be considered appropriate for a Gypsy or Traveller Site".* It is unclear whether this assessment has been completed on any of the sites as it does not form part of the consultation documentation or the Needs Assessment 2016.

Recommendation A: To comply with the statutory guidance, details of residential assessment to all sites should be provided as part of the consultation documentation.

1.1.2 The guidance also requires sites to be discarded if they lie within, or are likely to have a significant effect, on any sites such as Sites of Special Scientific Interest (SSSI), Special Areas of Conservation (SAC) etc. It should be noted that Site 1 is adjacent to a Special Landscape Area (SLA) and a Landscape Conservation Area this designation has already stopped residential development of land which was supported by a planning appeal and input from the Welsh Assembly (please refer to Appeal Ref: APP/L6805/A/08/2085702 - 18 February 2009). This assessment currently does not from part of the consultation documentation and is a key protection to the Isle of Anglesey.

Recommendation B: To comply with the statutory guidance, details of conservation assessments for all sites should be provided as part of the consultation documentation. Particular attention to the precedent of no residential development on land adjacent to Site 1 should be taken into consideration as part of the assessment.

1.2 The Detailed Site Assessments:

1.2.1 Notwithstanding the omissions detailed above, there appears to be a mismatch between the Policy documents which has resulted in omissions being made to the site assessment criterion. I have reviewed Topic Paper 18/18A and also a number of published Executive Committee papers. The criteria changes, depending upon which document you refer to, do not provide any explanation of why certain criteria have been removed or added. For example "Site Context and Character" and "Climate Change Mitigation" have been removed from the current selection criteria without any explanation.

With these anomalies in the criteria it is likely the current assessments will provide erroneous outputs and potentially inadequate requirements for facilities being provided (See below). It is essential that the full criteria are used to protect the Gypsy/Travellers and the residents of the Isle of Anglesey. Furthermore inadequate criteria usage could lead to the full costs not being identified, this is important as the Temporary Stopping Places (TSPs) will not be funded by the Welsh Assembly and the costs will fall to the community via the Council.

Recommendation C: To comply with the policy, all criteria should be used as set out in Topic paper 18(A) together with the addition of "Site Context and Character" "Climate Change Mitigation" and of course the additional "Adjoining Usage". This will require the assessment process to be enhanced and a new or addendum consultation paper prepared and presented.

1.2.2 A more complex criteria removal is the "Utility" criteria which has been removed by the assessment team as the sites are considered to be TSP's. However, without a proper usage assessment being carried out, the removal of this criteria imports risk into the assessment process and conclusions. As at the 9 June 2016, no member of the Councils consultation team could provide details of how many 14 day periods the site would be potentially used per annum at any given TSP. The Police have also raised the issue of the control of the TSPs so they do not to become permanent (please refer to Chief Superintendent Nigel Harrison email of the 9 March 2016).

Recommendation D: Undertake a risk assessment to provide the probability of usage for each site this will support the Utility criteria and ensure the correct facilities and funding are provided.

1.2.3 Care requires to be taken as the overarching definitions provided by the Welsh Government state a TSP can be used up to 28 days. However, the TSP's proposed for the Isle of Anglesey are for a maximum period of 14 days. So there is a conflict in definitions in the consultation paper which could import risk at a later date, as any site resident could go to the overarching definition of a TSP and potential stay for up to 28 days. This is important as the sites are not being designed to support that duration period. Furthermore, neither definition appears to be aligned with the definition provided in the Needs Assessment 2016.

Recommendation E: Resolve the conflict between the definitions of a TSP 14/28 days in the consultation paper.

2) Scoring Regime - Used for Site Assessment Purposes

The site assessment has a process for scoring each criterion which is used to rank the site for suitability and support key decisions.

The key points on Scoring regime:

2.1 Site assessment scoring regime

2.1.1 There is no definition within Topic Paper 18(A) Assessment Methodology to help understand and interpret the scoring metric. For example, what overall score would require to be achieved for a site to be considered suitable or

unsuitable for development into a TSP? The lack of transparency in the methodology leads to poor credibility and will put any decisions based on the assessment methodology at risk.

2.1.2 Each criterion currently has a maximum score of 5 with each criteria carrying equal weight to the overall score. Good practice requires each criterion to be weighted based on importance to the Travellers and Gypsies in order to ensure that the results are valid. Furthermore, having ecologically valid criteria will ensure compliance with policy, therefore it is likely each criteria will have a different maximum score it can attain.

2.1.3 Based on a conversation with one of the consultation team and confirmed by the Housing Strategy and Development Manager, there are no records of the rational on how the actual score given to any criteria by the assessment team was created/identified. For example, how was a score of 3 out of 5 for the criteria "Availability" selected? This approach lacks credibility and will put at risk the decisions being made from the output of these assessments. The criteria should be broken down into elements to enable the assessment team to score against each element of the criteria. This should be recorded to support a consistent approach, consultation and to provide a robust audit trial.

It should also be noted that notwithstanding the need to remove redundant or irrelevant criteria from the assessment purposes, there is a discrepancy in the scores attributed to the remaining criteria between Topic Paper 18 (A) and the Consultation Paper. There is no reason or rational given for this discrepancy, or whether this is an error in one of these documents.

Following this basic approach we would have a more transparent and robust assessment methodology with correctly weighted criteria and confidence in the consistency of the scoring and output.

Recommendation F: A definition of the metric should be provided in order to allow consistency in interpretability of the overall score, as well as providing a threshold overall score to support a decision to proceed or reject suitability of sites. Furthermore, all the criteria should be weight (please refer to Recommendation C above) and re-score each criterion recording the basis and decisions for the score. The rational for the score should be clear and transparent and a priori. This will require the consultation paper to be updated and reissued, I am doubtful this could be provided as an addendum as it would potential confuse the end users.

---

3) Risk Management - Risk Management Policy

The policy is quite clear that risk management should be in place to manage risks within agreed limits in order that desired outcomes are achieved at a corporate and project level. Failing to identify, assess and manage risks may result in considerable un-budgeted expenditure, damage to the Council's reputation and community confidence. It will also potentially place unreasonable and unacceptable financial burden on the tax payers of Anglesey. (Source: Isle of Anglesey Risk Management Policy 26 May 2015).

The key points on Risk Management:

3.1 Lack of Project and Site Risk Assessments

3.1.1 I was informed by the Housing Strategy and Development Manager, at the consultation meeting that no risk assessment has been made at either project level or site level. This is significant omission not just in respect to project, commercial or reputation risk, but more importantly there has been no overall project or site specific safety risk assessments carried out. This is a significant non-compliance with the council policy.

At the evening consultation meeting this was discussed further with the Housing Strategy and Development Manager, who referenced to the lack of time available and that a deadline had to be achieved to comply with the requirement of the Welsh Government. A proposal was put to the Manager that a number of residents would be more than happy to be part of the risk/opportunity assessment workshop and that it should also include representatives from the Gypsy/Traveller community. This provision is key to the consultation process, Safety Policy and the Corporate Governance requirements of Anglesey County Council.

Recommendation G: Comply with Risk Management Policy and undertake project and site specific risk assessment including safety risk assessments. This must from part of the consultation process and support the decision making process to enable an informed decision to be made.

---

4) In Conclusion

This letter provides a significant review of compliance with policies, process and good practice. In summary there are a significant number of issues in relation to policy which require addressing before key decisions can be made and consultation can proceed. If these actions are not progressed it is likely to import significant risk to the Gypsies/Travellers, the residents of Anglesey and Anglesey County Council. These non-compliances will also potential inherit a reputation and financial risk to the council.

If you have any questions please do not hesitate to phone or email.

Yours

Mark Inwood

c.c.
- Dr Gwynne Jones, Chief Executive
- Lucy Reynolds, Housing Strategy & Development Manager
- Mike Evans, Planning Department
- Meirian Jones, Local Councilor

CYNGOR SIR
YNYS MÔN
ISLE OF ANGLESEY
COUNTY COUNCIL

Dr. Caroline Turner
Prif Weithredwr Cynorthwyol
Assistant Chief Executive

CYNGOR SIR YNYS MÔN
ISLE OF ANGLESEY COUNTY COUNCIL
Swyddfa'r Sir
LLANGEFNI
Ynys Môn - Anglesey
LL77 7TW

Gofynnwch am - Please ask for: Jessica Jones
☎ (01248) 751919 🖷(01248)750839

E-Bost-E-mail: carolineturner@ynysmon.gov.uk

Ein Cyf - Our Ref. CT/VLJ/Ymatebion
Eich Cyf - Your Ref.

Mr Mark Inwood
Orsedd Newydd
Star
Anglesey
LL60 6AY

29th June, 2016

Dear Mr Inwood,

Thank you for your letter dated the 13th June. I've now had time to consult colleagues in the Gwynedd and Anglesey Joint Planning Policy Unit, who have prepared the response below. You are more than welcome to contact Nia Haf Davies, the Head of the JPPU, if you wish to clarify the process of preparing and consulting on the Joint Local Development Plan (I suggest that you initially contact Nia via email – I will copy her in when sending this letter to you).

Before I address your detailed comments it might be useful to clarify the status of Topic Paper 18/ 18A Identifying Gypsy and Traveller Sites.

The Joint Planning Policy Unit has prepared a series of topic papers to offer more detailed information than can be included in the Plan. They also provide an opportunity to explain the Plan's approach to different topics and issues affecting the Joint Local Development Plan Area. Topic Paper 18/18(A): Identifying Gypsy and Traveller Sites have been prepared as supporting documents to identify the issues, objectives and options for the Deposit Plan in relation to the need to identify land for pitches to be used by Gypsies and Travellers.

The Topic Papers are part of the Joint Local Development Plan Library and have been submitted to Welsh Government on this basis. However, they do not form part of the Plan that will be subject to Independent Examination by the appointed Planning inspector. They do not constitute policy as this is the role of the development plan. They may be referred to by the Inspector should he wish to understand a policy approach.

The Topic Papers acknowledge that preferred sites will be the subject of detailed further investigation and consultation with key stakeholders before being taken forward in the Joint Local Development Plan. These investigations will include Sustainability Appraisals for the proposed options as outlined in Topic Paper 18 (paragraph 2.12 - 2.14) Key internal and external stakeholders including the public, will be afforded the opportunity to comment on proposed possible Gypsy Travellers Sites before they can be confirmed as allocations in the Joint Local Development Plan. Given that the Plan is already at Examination stage any suggested amendments to policy will be included in a schedule of Matters Arising Changes (MACs). These will be subject to public

consultation before they are included in the final Plan. The representations submitted about the MACs will be sent to the Planning Inspector. There will also of course be opportunities to make representations at the planning application stage.

I would also like to take this opportunity to clarify the status of other documents referred to in your letter. The Welsh Government Planning Circular 30/2007 '*Planning for Gypsy and Traveller Caravan Sites*' provides guidance to Local Authorities when trying to identify suitable site locations in their statutory Local Development Plans. The Welsh Government publication - Designing Gypsy and Traveller Sites (2015) is also guidance not statutory. However, following this guidance will help Local Authorities and others in the development and improvement of Gypsy and Traveller sites in their area, and will form part of the consideration of the Welsh Government in assessing applications for Sites Capital Grant funding in relation to Gypsy and Traveller sites.

The following are extracts from Designing Gypsy and Traveller Sites – WG Guidance (2015), which refers to the provision of sites: Paragraph 3.21: "If a location is considered inappropriate for conventional housing use on the grounds of health and safety, then it should also be considered inappropriate for a Gypsy and Traveller site. A Gypsy and Traveller site should not be located in areas, which will have a detrimental effect on the general health and well-being of the residents. The location of a site should enable, not hinder, access to services such as health and education."

Paragraph 3.22 "As with all developments, it is likely that Local Authorities will need to follow the 'line of best fit' when assessing potential sites. It may be that none of the potential sites can completely satisfy the guidance in this document." The guidance goes on to describe the general themes that Local Authorities should consider.

It is considered pertinent to note that the above guidance is provided by Welsh Government in relation to the proposed provision of permanent residential pitches as opposed to temporary stopping places. It is the need for the latter that the Council is seeking to address at this stage. Section 7 of WG Guidance sets out the expectations relating to temporary stopping sites. Whilst the health and safety of households is relevant, the expectations in terms of services and facilities on or for the users of temporary stopping sites are more basic.

I shall now deal with each matter and recommendation as set out in your letter:

Your comments and recommendations	**Officers Response**
Recommendation A	Not accepted. The Welsh Government document Designing Gypsy and Traveller Sites May 2015 is a guidance document and is not statutory. Nonetheless, the Council considers that it has adequately addressed the matters raised in the guidance document. As referred to above, the current public consultation seeks views about potential temporary stopping sites <u>not</u> sites for permanent residential pitches. The search area is guided by the

	evidence relating to the identified need. The nature of these sites is to provide an alternative location to reduce the risk of re-location of inappropriate encampments or provide an appropriate location for the re-location of inappropriate encampments, which are being witnessed on the Island. Therefore, temporary stopping places need to be pro-actively identified before encampments occur. The Council appreciate that health and safety is one factor that should be taken into account when considering possible suitable locations for Gypsy-Traveller sites. Paragraph 5.3.4 of Topic Paper 18A provides an overview of the themes to be considered, which includes the suitability of a site in terms of "Free from environmental constraints including risk of flooding, contaminated land, proximity to hazardous locations or operations." Paragraph 4.5.3 of the document that supports the current public consultation affirms this requirement, referring to consideration of "on-site contamination, nearby pollution, noise levels, flood risk." A detailed health and safety assessment is not required to inform the documents issued for public consultation.
Recommendation B	The Council considers that it has address the factors set out in WG Circular 30/2007 and Designing Gypsy and Traveller Sites and Designing Gypsy and Traveller Sites – WG Guidance (2015) The latter expects Local Authorities to consider the environmental sustainability of sites. Paragraph 19 of the Circular provides a schedule of factors to be considered in terms of site suitability. One of which relates to "regard for areas designated as being of international or national importance for biodiversity and landscape. " Any statutory duties associated with a national or international designation have been considered is selecting the potential sites. Due regard has also been given to areas designated as being of local landscape or nature conservation value. Paragraph 35 of the above Circular, national planning policy set out in Planning Policy Wales (paragraphs 5.5.2 & 3), as well as current and emerging local planning policy make it clear that local designations should not be used in themselves to refuse planning permission for development. At a planning application stage local planning authorities must always consider whether environmental issues could be adequately addressed by modifying the development proposal or by attaching appropriate planning conditions or obligations. Therefore for the purpose of this consultation the Council considers that it has adequately addressed the relevant factors.

Recommendation C	The Council considers that it has adequately addressed the methodology outlined in background Topic Papers 18 and 18A, which are essentially live documents that record the progress in identifying suitable sites. The sites that the Council have consulted upon have been subject to the sustainability assessment process referred to in the Topic Papers and the Sustainability Report (March 2016) that accompanied the Joint Local Development Plan on submission. All reasonable options for temporary Gypsy and Traveller sites have been subject to the same method and appraisal against the Sustainability Appraisal Framework of Objectives.
Recommendation D	It is accepted that the Council has not set out how frequent the temporary stopping places would be likely to be occupied over a year. The Council has historic records of unauthorised encampments on the Island, which has informed the Gypsy and Traveller Accommodation Needs Assessment 2016. The Council has no evidence to demonstrate that the need for accommodation for Gypsy Travellers will increase over the next 5 years or that provision of designated temporary stopping places for Gypsy Travellers will result in a greater number of occurrences of Gypsy Travellers staying on the Island for temporary periods. It does not necessarily follow that the provision of designated Temporary Stopping Sites will result in every Gypsy Travellers households visiting the Island choosing to use the designated sites. The use of the designated sites will be closely monitored as will occurrences of unauthorised encampments. Any changes in demand for sites or changes in use of designated sites will be addressed. There is a statutory duty placed upon Local Authorities to comply with the requirements of the Housing Act (Wales) 2014. The Council will therefore need to budget accordingly. The level of provision of facilities and services required for temporary stopping places should be minimal in comparison to the need to deal with unauthorised encampments and in comparison with permanent residential pitches.
Recommendation E	A standard definition for temporary stopping sites has been included in the paper for public consultation. Nonetheless the detailed sections of the paper describe the proposed local approach. For the avoidance of doubt, the Council intends to allow Gypsy Travellers to stay for up to 2 weeks on its designated temporary stopping place located in the central part of the Island and 1-2 nights on the proposed site in the Holyhead area to serve the needs of Gypsy Travellers using the ferries.

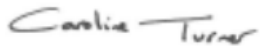
Recommendation F	The methodology for assessing possible sites is explained in Section 5.4 and 5.5 of Topic Paper 18A. The matrices referred to in the Topic Paper and Consultation Document have been used as a guide to quickly compare the relative suitability of possible sites and as a filtering mechanism. The process involves making an informed judgement about how closely a site conforms to the objectives. There has been no attempt to weight the different factors referred to in the matrix because there is no rational basis for doing so.
Recommendation G	The Council's Risk Management Policy was approved by the Council's Executive Committee Policy on the 26th May 2015. The Council's Chief Executive supported by the Strategic leaders Team are well aware of the corporate risks associated with this project. The Officers responsible for assessing potential sites appreciate that the health and safety of Gypsy Traveller households is a factor that should be considered in the identification of possible suitable temporary stopping places and subsequently at the operational stage. The sites that are the subject of this consultation are considered to have the potential to be suitable locations to provide temporary stopping pitches for Gypsy Traveller households and it is recognised that some potential impacts may require appropriate mitigation. The Council has consulted the public and key stakeholders to obtain their views and observations about the suitability of the suggested sites. The Council fully appreciate that further detailed assessments may be required to support the submission of the necessary detailed planning application, but consider that it is not necessary to include a detailed health and safety impact assessment of each site to inform this consultation.

I have therefore carefully considered your comments and recommendations and have taking into account observations from relevant officers. I do not consider that it is necessary to withdraw or to change the current consultation documents about possible temporary Gypsy – Traveller Sites on the Island.

In preparing the public consultation documents the Council has sought to provide sufficient information, without over complicating matters, to enable the public to make an informed response. However, the Council fully appreciates it may have to carry out further investigative work and/or commission various detailed assessments as a result of the responses received to the consultation and as the project progresses through the planning system.

Your comments, together with all the comments received will be assessed and will be taken into account in the decision making process.

Your sincerely,



Dr Caroline Turner
Assistant Chief Executive (Statutory Director of Social Services)

Copy to: Dr Gwynne Jones, Chief Executive
Nia Haf Davies, Head of Joint Policy Planning Unit
Dafydd Rowlands, Housing Manager
Cllr R Meirion Jones, Local Councillor

Temporary Stopping Places for Gypsies and Travellers on Anglesey - Questionnaire

Q1. Name

Cyngor Cymuned Penmynydd

Q2. Organisation you represent (if relevant)

Star

Q3. Address including post code

Parc Uchaf
Rhosmeirch
Llangefni
LL77 7NQ

Q4. Site 1 - Strip of land between A55/A5 between Llanfairpwll and Star Crossroads.

Not suitable

Provide brief reasons for your view if you wish
Mae'r tir yn anaddas, yn wlyb ac yn beryglus. Bydd y gost o wneud y safle yn ddiogel yn uchel. Bydd y safle yn weladwy i drigolion a thwristiaid sy'n teithio ar hyd yr A55. Mae'r cyngor yn pryderu nad oes asesiad risg wedi cael ei wneud.

Q5. Site 2 - Parcel of land at Gaerwen smallholding.

No Response

Q6. Site 3 - Land adjacent to the A5 near Cymunod Farm, Bryngwran.

No Response

Q7. Site 4 - Land at former farm, off Cyttir Road, Holyhead (south of Kingsland School).

No Response

Q8. Site 5 - Land at Tyddyn Lantern Farm, Holyhead.

No Response