

ISLE OF ANGLESEY COUNTY COUNCIL	
Report to:	Partnership and Regeneration Scrutiny Committee The Executive Committee
Date:	19 July 2016 25 July 2016
Subject:	Consultation on Gypsy and Traveller Sites in Anglesey – Temporary Stopping Places in the Holyhead Area.
Portfolio Holder(s):	Councillor Aled M Jones
Head of Service:	Shan L Williams, Head of Housing Services
Report Author: Tel: E-mail:	Mike Evans Senior Planning Officer, Joint Planning Policy Unit. 01286 679825 mikeevans@gwynedd.gov.uk
Local Members:	Dafydd Rhys Thomas Jeffrey M Evans Trefor Lloyd Hughes J Arwel Roberts Raymond Jones Robert Llewelyn Jones

A –Recommendation/s and reason/s
<p>Recommendations: following analysis of the responses to the consultation and site assessment exercises outlined within the report, it is recommended that</p> <ol style="list-style-type: none"> 1. Neither of the two sites included in the consultation to provide a temporary stopping place in the vicinity of Holyhead should be progressed or included in the Local Development Plan. 2. IACC should carry out further work to identify alternative sites to meet the need for a temporary stopping place in the Holyhead area as identified in the Council's Gypsy and Traveller Assessment 2016 to comply with the Council duties under Part 3 of the Housing (Wales) Act 2014. 3. Further work should be undertaken by IACC to better understand the level of use of Holyhead Port by Gypsy-Travellers and the level of unauthorised

encampments occurring as a result of travel to and from the Port. This to include further discussions with the Police, Port Authorities Welsh Government and other key stakeholders.

4. As a short-term solution, IACC to consider placing bins in a suitable location to reduce the incidence of domestic waste fly-tipping which has been associated with unauthorised encampments in Holyhead.
5. IACC should continue to fulfill its role to promote community cohesion. This must balance the needs of local communities and visiting Gypsy Travellers to feel safe and to be consulted on development issues with the recognition that the Council must act to counter racist attitudes and challenge inflammatory comments.

Reasons for the Recommendations

For each of the two sites in the consultation, significant opposition has been encountered within the local community. Significant local opposition without evidence cannot be used as justification for deciding not to recommend a particular site. A summary of the consultation is provided later in the report. However, as outlined below, certain critical issues were raised that means these sites cannot be considered suitable to show as an allocation in the emerging Joint Local Development Plan and proceed to a planning application.

Reasons for recommendation 1

Site 4 - Land at former farm, off Cytir Road, Holyhead (south of Kingland School)

This land is part of the Welsh Government Enterprise Zone. The Economic Development Section of the Council and Welsh Government Property Division have concerns that the proposed temporary use could discourage further investment which creates jobs in the locality. Policy in the Council's Deposit plan supports this argument ie. Policy CYF2, Ancillary Uses on Employment Land, confirms the need to protect employment land and that land for ancillary uses will only be released in exceptional circumstances. Policy CYF4, Alternative Uses of Employment Sites also states that land allocated for Use Classes B1, B2 or B8 would only be granted alternative uses in special circumstances. Welsh Government as part landowner for this site consider that all their landholding at Park Cybi should be safeguarded for future employment uses and not willing for this site to be used by the Council as a Temporary Gypsy-Traveller Site even as an interim measure. This despite the fact that this site is

separated by a road from the main Parc Cybi site, currently is accessed through a different part of town, and is not unduly prominent due to existing mature trees and hedges.

Many of the objectors consider that it would be inappropriate to site a temporary Gypsy-Traveller Site next to a school and childrens nursery. Whilst fears for personal and community safety have not been supported by factual evidence, it is considered legitimate to take some account of perceived fears of local people, Vehicular access to the site would involve vehicles towing caravans having to drive through a residential area and past the entrance to the school. Whilst some highway improvements could be carried out, the road network by the school is prone to congestion particularly when children are dropped off or picked up from the school. It is considered that the use of Site4 could discourage pedestrians from using the nearby footpaths to access nearby shops and for leisure purposes.

Whereas some of the concerns referred to could be addressed and mitigated by appropriate design and management, on balance, it is considered that the site should not be recommended as being suitable for development as a temporary Gypsy-Traveller Site. The possible use of this site as a Gypsy Traveller has the potential to adversely affect local businesses and residents to an unacceptable degree.

Site 5 - Land at Tyddyn Lantern Farm, Holyhead

The Economic Development Section of the Council and businesses operating in the vicinity of this site have expressed considerable concern about the impact of a site in this location on existing businesses. This site is not allocated in the Ynys Mon Local Plan for employment uses, but there is potential conflict with with the allocation of this site for Employment purposes in the Stopped Unitary Development Plan, and the policies in the emerging Joint Local Development Plan. The Gwelfor Community Centre and Meithinfa Morfo Nursery that are located in close proximity to Site 5 and local residents and business have raised a number of objections to the possible use of this site, including harm to the future of the community centre and possible closure of the nursery business, perceived health and safety risks to the nearby community, access issues and possible harm to protected plant species. The Council's Ecological and Environmental advisor has referred to The nature and wildlife value of this site Concern has also been expressed about the proposal harming the enjoyment of users of the section of the Coastal Path that adjoins the site.

Whereas some of the concerns referred to could be addressed and mitigated by appropriate design and management, on balance, it is considered that the site should not be recommended as being suitable for development as a temporary Gypsy-Traveller Site. The possible use of this site as a Gypsy Traveller has the potential to adversely affect local businesses and residents to an unacceptable degree.

Reason for Recommendation 2

The Council must continue to seek a suitable site in order to fulfill its duty under part 3 of the Housing (Wales) Act 2014. The Welsh Government has powers to direct the Council to act if reasonable progress is not made. The council must also include sufficient sites for Gypsies and Travellers in the Joint Local Development Plan or risk that the plan will be found unsound.

The Police (see Appendix 2) have supported the need for Temporary Stopping Place within Anglesey which to their knowledge are usually from those waiting for onward ferry travel to Ireland.

Reason for Recommendation 3

The consultation has started a dialogue between Council officers and residents, resident representatives and businesses about the current situation in relation to Gypsies and Travellers passing through the town. This needs to continue so that an appropriate approach can be found to understanding and addressing issues arising. The Port Authority is identified as a vital participant in this process.

Reason for Recommendation 4

Providing bins in suitable locations and making arrangements for domestic refuse collection can reduce the incidences of fly tipping that occasionally has been associated with unauthorised encampments in Holyhead. Such action can reduce possible clear up costs and help protect the local environment and amenities for nearby residents and businesses..

Reason for Recommendation 5

Gypsies and Travellers are a recognised ethnic minority and are therefore protected by the provisions of the Equality Act 2010. The Council has an important role to play in creating understanding and addressing prejudice towards this minority. There was

evidence that rumours and misconceptions about the type and size of the site proposed developed in the course of the consultation period. Some of the responses to the consultation were disparaging and inaccurate.

Background

The Housing (Wales) Act 2014 places a duty on Local Authorities to provide sites for Gypsies and travelers 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, assessed a need both permanent and temporary stopping places on the Island.

Proposals for Gypsy-Traveller Sites nearly always raise vociferous objections from those who perceive a 'threat' from this type of development, whether it be on the appearance of an area or its social character. Some objections of this kind may be based on prejudice or ignorance, often drawn from bad experiences or heresay, making it very difficult for the Local Authority and its members to be objective on the matter.

Possible criminality has been raised in relation to the impact of a proposed Gypsy-Traveller in or near Holyhead. However, little weight can be given to general fears and concerns of crime, unless they are based on evidence relating directly to the future occupiers.

It is accepted that finding suitable sites for Gypsy Travellers can become emotive during the planning process. However decisions need to be taken in the wider public interest and in a rational way, informed by evidence, where these issues are balanced against other factors. Before an authorised Gypsy-Traveller site is developed, planning permission must be obtained. This stage in the process will provide details and certainty about matters such as vehicle access, site layout design and, landscaping. There will therefore be an opportunity for interested parties to make representations on any future planning application before it is determined.

Type of sites which need to be provided and size

The Anglesey and Gwynedd Gypsy and Travellers Accommodation Needs Assessment identified that a temporary stopping place for up to 12 caravans is required in the vicinity of Holyhead. The evidence for this was the recorded pattern of unauthorised encampments occurring in the Holyhead area. Some Gypsy-travellers who use the ferry service to and from Ireland choose to stay for short periods (1-2 days) near to the

Port whilst waiting to catch a ferry or having arrived from Ireland.

Potential Sites in the Holyhead area that were the subject of public consultation between 11th February 2016 and 11th March 2016:

The following sites were included in the consultation as potential shortlisted sites in Holyhead,

- Vacant Plots, Penrhos Industrial Estate, Holyhead
- Land immediately to east of B&M (formerly Homebase), Holyhead
- Land to the south of Alpoco.

The Council's Executive Committee meeting on the 31st May resolved that none of the above sites should be progressed or included in the Local Development Plan; They also resolved to carry out further work to identify alternative sites to meet the need for a temporary stopping place in the Holyhead area.

Further Consultation between 2nd June and 1st July 2016 regarding two possible Temporary Stopping Places for Gypsies and Travellers in the Holyhead Area.

Officers have assessed a substantial number of alternative sites (see Appendix 3) and have taken account of Welsh Government guidance in developing its methodology to assess suitable sites. The two sites included in the recent consultation were considered to have the potential for development as Temporary Stopping Places for Gypsy-travellers.

Between 2nd June and 1st July 2016, extensive public consultation was undertaken by the Council regarding two potential Temporary Stopping Places for Gypsy and Traveller Sites in the Holyhead Area. The two potential sites sites are located at:

- Site 4 - Land at former farm, off Cytir Road, Holyhead (south of Kingland School)
- Site 5 - Land at Tyddyn Lantern Farm, Holyhead

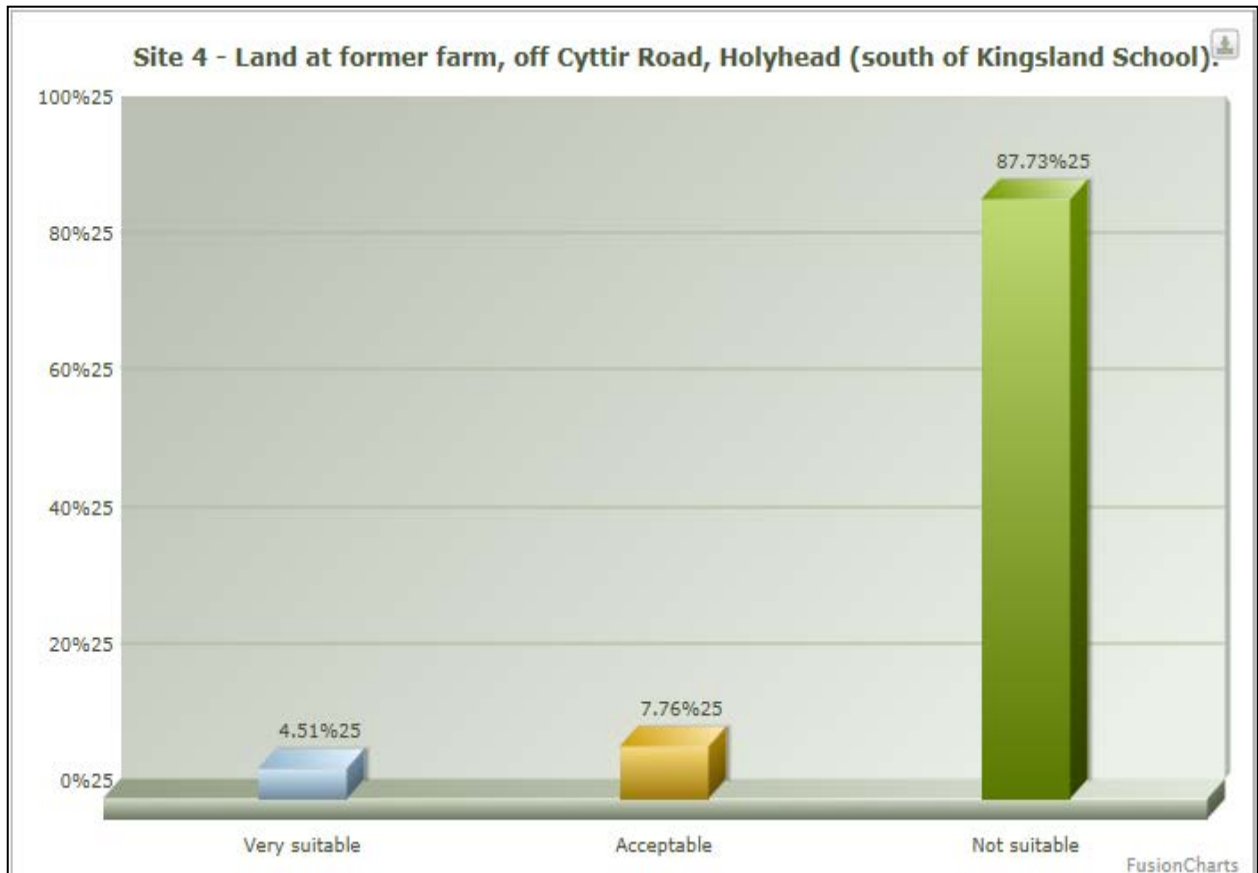
A consultation document with maps and consultation questionnaire was available on the Council's website and at a well attended drop-in session at the Senior Citizen's Club, London Road, Holyhead on the 15th June 2016. Copies were also sent to businesses adjacent to the sites, land owners and residents in the immediate vicinity of the sites . The consultation document was also sent to the Federation of Small Businesses, Farmers Union of Wales and National Farmers Union, North Wales Police, North Wales Fire Authority, Wales Ambulance Service, Betsi Cadwalader Health Board, Natural Resources Wales, and Welsh Water.

Throughout the consultation period, information was prominently displayed on the Council's web-site, facebook and twitter.

Analyse of Responses

The Council received 707 completed questionnaires, 21 letters and emails and 1 petition signed by 729 individuals. 554 of the questionnaire responses referred to Site 4 - Land at former farm, off Cytir Road, Holyhead (south of Kingland School) and 535 questionnaire responses to Site 5 - Land at Tyddyn Lantern Farm, Holyhead

Site 4 - Land at former farm, off Cytir Road, Holyhead (south of Kingland School) Summary of main consultation responses



486 of the respondents considered that this site is unsuitable. The respondents who considered that the site is very suitable or acceptable did not reside near to this site.

The main reasons stated by residents, businesses and other organisations for objecting to this site were

- Too close to schools and nursery
- Too close to residential areas (residents would feel unsafe)
- Fear of increased crime

Followed by concerns regarding

- The suitability of the road and impact of increased traffic
- Health and safety aspects such as litter, smoke affecting A55 and straying animals
- Environmental impacts.
- Harmful to local business and tourism

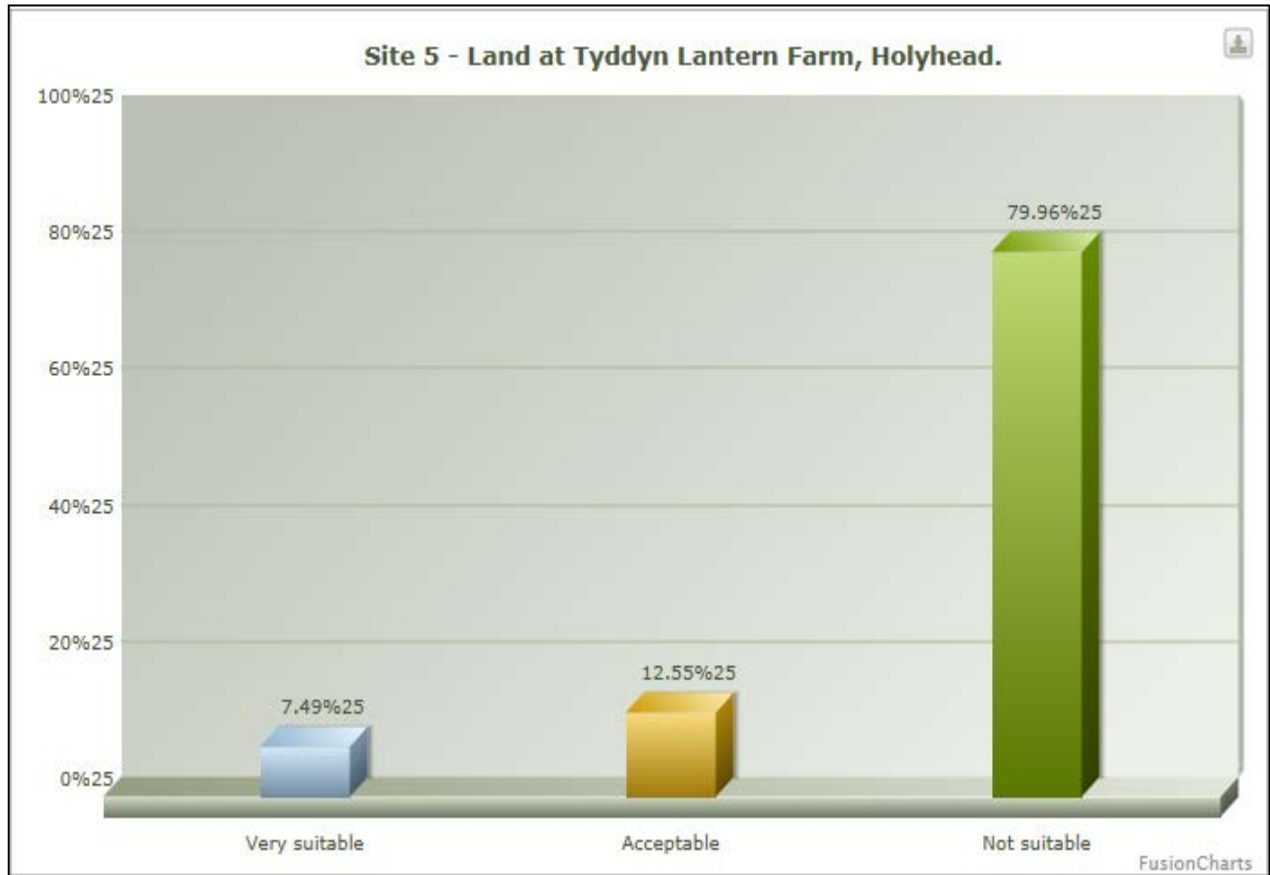
A minority of respondents expressed concerns regarding issues including. costs to the Council, impact on property values, impact on community spirit and no need for a proposed site to be located so close to the port.

It should be borne in mind that some of the stated reasons for objecting would not be considered to be material planning considerations should a planning application be submitted. For example, fear of increased crime without evidence and effect on property values would not be factors that could be taken into account when deciding a planning application.

Site 5 - Land at Tyddyn Lantern Farm, Holyhead Summary of main consultation responses

A petition was also presented to the Council referring to Site 5 – Land at Tyddyn Lantern Farm. The petition was signed by 729 individuals who endorsed the following statement at the top of the petition.

“ This petition is to oppose the proposed Temporary Stopping Places for Gypsies and Travellers at Site 5 – Land at Tyddyn Lantern Farm, Holyhead. We are starting the petition as we feel this is an unsuitable area due to the large number of families, businesses and houses. We hope that Anglesey Council will use this petition to see how strongly local people feel regarding the situation”.



428 of the respondents considered that this site is unsuitable. The small number of respondents who considered that the site is very suitable or acceptable did not reside near to this site.

The main reasons stated by residents, businesses and other organisations for objecting to this site were

- Too close to schools and nursery
- Too close to residential areas (residents would feel unsafe)

Followed by concerns regarding

- The suitability of the road and impact of increased traffic
- Fear of increased crime
- Negative environmental impacts.
- Harmful to local business and tourism

A minority of respondents expressed concerns regarding issues including, costs to the Council, impact on property values, too close and no need for a proposed site to be located so close to the port.

It should be borne in mind that some of the stated reasons for objecting would not be considered to be material planning considerations should a planning application be submitted. For example, fear of increased crime without evidence and effect on property values would not be factors that could be taken into account when deciding a planning application.

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.

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

Yes

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

Yes

E – 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)	
5	Human Resources (HR)	
6	Property	IACC Property department have been closely involved in the whole site identification process.
7	Information Communication Technology (ICT)	
8	Scrutiny	
9	Local Members	All local Members had the opportunity to take place in the consultation.
10	Any external bodies / other/s	North Wales Police Natural Resources Wales Gwynedd Archaeological Planning Service Holyhead Town Council IACC departments: Highways Section Drainage Section Regulatory Department (Economic Development, Planning, Environmental Health)

F – Risks and any mitigation (if relevant)		
1	Economic	
2	Anti-poverty	
3	Crime and Disorder	See Appendix 2 Email from North Wales Police
4	Environmental	See Appendix 2
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 if it fails to comply with statutory requirements.
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FF - Appendices:
Appendix 1 Summary of Responses from formal consultees
Appendix 2 Letters from key organisations: Morlo Nursery Gwelfor Community Centre Dwr Cymru North Wales Police Natural Resources Wales Gwynedd Archaeological Planning Service IACCRegulatory Department. IACC Highways Section IACCDrainage Section
Appendix 3: Long list of sites identified by Officers of Anglesey County Council

G - 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. Consultation Document, Consultation on Gypsy and Traveller sites on Anglesey, June 2016.
8. Long list of sites identified by Officers of Anglesey County Council

Appendix 1- Summary of Responses from formal consultees

Site 4 -Land at former farm, off Cyttir Road, Holyhead (south of Kingland School)			
Organisation	Issue	Summary of comment from consultees	Officer Response to the comment
Natural Resources Wales	Environmental issues	<p>Aquifers Typology</p> <ul style="list-style-type: none"> Any proposed allocations for development within this Secondary Aquifer may prove to be acceptable, NRW would need further details of the drainage disposal at the site to comment further on the acceptability of the site. <p>Landscape</p> <ul style="list-style-type: none"> The application site is located adjacent the Ynys Môn Area of Outstanding Natural Beauty (AONB). There is a 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. 	All comments noted (Need to take account of the contents of letters in their entirety if site likely to progress to planning application stage).
Highways IACC	Highway safety	<ul style="list-style-type: none"> Concerned that the development could be detriment of highway safety and it's users. 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. 	As above
Drainage Engineer Highways IACC	Drainage	<ul style="list-style-type: none"> The proposal is within an area served by foul and surface water drainage systems; 	As above

		<ul style="list-style-type: none"> Public combined sewers are located within the adjacent Maes Cyttir Estate ; however any connection to this network may require the utilisation of a pumped system and would need the permission of the sewerage undertaker, Dwr Cymru Welsh Water. No surface water flooding has been recorded on this land , however a scheme may be required to manage run-off from adjacent higher ground. 	
Ecological and Environmental advisor, IACC	Ecological issues	<ul style="list-style-type: none"> Appears to be brownfield site with many trees and other vegetation growth. Would be need to take account of nesting birds and potentially bats, if using certain trees for roosting. Would advise basic survey to establish present ecological habitat and detail whether any trees had potential for bat roosting, identifying any particular further survey needs (for bats, reptiles or suchlike). 	As above
Dwr Cymru	Utilities	<ul style="list-style-type: none"> 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. 	As above
Gwynedd Archaeological Planning Service	Archaeologica l	<p>“Restraint” on use of site. This site is to the north of the Parc Cybi development area. The development on the Parc Cybi site led to the discovery of extensive, multiphase archaeological remains of national significance, including a Neolithic house, later prehistoric</p>	As above

		<p>settlement, Bronze Age multi-cist barrow and a medieval cemetery. As such the Cyttir road site retains some potential for similar remains to survive. However, the Cyttir Road site comprises an already developed area in which it is likely that buried archaeological remains or deposits may have been disturbed and in which less extensive ground works might be required in order to facilitate the development of any proposed traveller site. As such there are some archaeological implications for this site but they would appear limited.</p>	
Economic Development, Anglesey County Council IACC	Potential economic impacts	<ul style="list-style-type: none"> • The Economic Development section has major 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. 	As above
IPanning, IACC	Planning	<ul style="list-style-type: none"> • 'Possible highway issues and possible conflict with existing planning policies • From a planning perspective this site is the less favoured of the two in Holyhead. 	As above

Environmental Health, IACC	Environmental Health	<ul style="list-style-type: none"> Concerns raised regarding increased congestion and additional traffic and amenity issues. 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. 	As above
North Wales Police	Crime and Disorder	<ul style="list-style-type: none"> Acknowledge the need to provide appropriate temporary stopping places in suitable locations. However, raise some concerns regarding how use of the sites will be controlled and managed. 	As above
Welsh Government - Department of Economy Science and Transport	Highways and Environmental	<ul style="list-style-type: none"> Recommend imposition of certain conditions and compliance with listed informatives Refer to nature conservation value of site 	As above

Site 5 Land at Tyddyn Lantern Farm, Holyhead

Organisation	Issue	Summary of comment from consultees	Officer Response to the comment
Natural Resources Wales	Environmental issues	<ul style="list-style-type: none"> Nature of the rock at this location means that certain types of development pose a pollution risk to private water supplies in the area. NRS would need to consider details of the means of 	All comments noted (Need to take account of the contents of letters in their entirety if site likely to progress to planning application stage).

		<p>drainage disposal at the site in order to comment further on the acceptability of allocating this site.</p>	
Highways IACC	Highway safety	<ul style="list-style-type: none"> • 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 	As above
Drainage Engineer Highways IACC	Drainage	<ul style="list-style-type: none"> • The site is within an area served by combined public sewers and any proposed connections would need to be agreed with the sewerage undertakers, Dwr Cymru Welsh Water. • A suitably designed scheme using soakaways, or alternatively providing a positive outfall to the sea, would be required for the drainage of surface water run-off from the land. 	As above
Ecological and Environmental Advisor,	Ecology	<ul style="list-style-type: none"> • This site appears to hold habitat suitable for reptiles and nesting 	As above

IACC		birds. Would request a survey to identify habitats and outline what further surveys would be required; if reptiles found to be present, a suitable mitigation plan would have to be devised, depending on findings (and actual proposals).	
Dwr Cymru	Utilities	<p>110mm water main nearby. No issues with water supply.</p> <ul style="list-style-type: none"> • 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. 	As above
Gwynedd Aarchaeological Planning Service	Archaeological	<ul style="list-style-type: none"> • “<u>No Known Restraint</u> It appears unlikely that a proposed development here would have any significant archaeological implications. 	As above
Economic Development, Anglesey County Council	Economic impacts	<ul style="list-style-type: none"> • The R&ED Service has some concerns with regards to the proximity of the site to businesses located at Holyhead Fish Dock. 	As above
Planning, IACC	Planning	<ul style="list-style-type: none"> • Concerns raised regarding affect on Coastal Path is potential conflict with the Stopped Unitary Development Plan and emerging Plan • Final choice of site will need to be fully justified. 	As above
Environmental Health, IACC	Environmental Health	<ul style="list-style-type: none"> • This site appears to have some separation (in the form of industrial developments) from the nearest residential property which 	As above

		<p>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.</p> <ul style="list-style-type: none"> • Concerns regarding traffic implications possible detrimental amenity impact. 	
Welsh Government - Department of Economy Science and Transport	Highways and Environmental	<ul style="list-style-type: none"> • Recommend imposition of certain conditions and compliance with listed informatives • Refer to nature conservation value of site 	As above



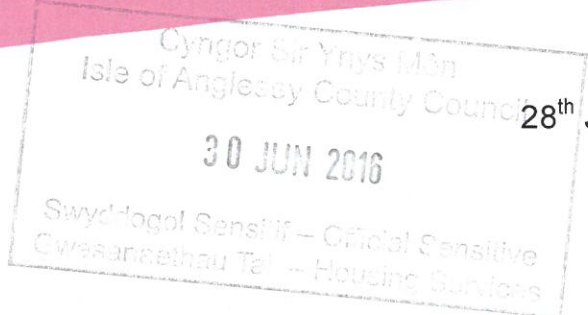
Meithrinfa Morlo Nursery

Nor adnoddolys

Ffordd Tudur, Holyhead, Anglesey, LL65 2DH

01407 763233

E-mail: meithrinfamorlo@aol.com



28th June 2016

Dear Anglesey County Council

RE: Site 5 Tyddyn Lantern Farm, Holyhead

We the Directors and Manager of Meithrinfa Morlo Nursery are writing to you to strongly oppose Site 5 Tyddyn Lantern Farm, Holyhead.

Meithrinfa Morlo Nursery is a non-profit making company. The nursery was initially set up by a group of local residents who attended community development courses in the local community centre. The residents then did a feasibility study to see if there was a need for the nursery in their local community area, and they found out that there was. The group then secured Welsh Assembly Government funding to construct the Nursery. We have now been open for 12 years and are self-sufficient and have built an excellent reputation. We have been working for the last five years on achieving the Healthy and Sustainable Pre-school Scheme National Award and completed it this year receiving our award on Tuesday 21st June 2016. We employ 18 members of staff, 100% of these live within the local area. We also provide care for 94 children aged 3 months to 12 years.

From discussions we have had with our parents a number have come to us with worries and stated that if this does go ahead they will be removing their children from the nursery. I have included letters from the parents as evidence. I feel this would be detrimental to the nursery and could make 18 local people unemployed.

Morawelon is in the top 10% of the most deprived wards in Wales and feel that a site like this could make this area worse. In recent years the Morawelon and London Road partnership and Gwelfor have worked hard to secure funding to improve the area and continue to do this. By putting this site here it will reduce house prices but will increase our council tax as local people will have to cover the cost of the upkeep of this site which is unfair for the local people. It will also cause Adverse effect on the residential amenity of neighbours, by reason of (among other factors) noise, disturbance, loss of privacy, overshadowing, etc. including the noise or disturbance arising from the actual execution of the works.

On reading the summary of reasons why these sites have been shortlisting I feel you have failed to identify a number of things.

Accessibility: Access to Ferry terminal (less than 1km) down narrow but quiet road

This road is not quiet. When the ferry has come in or loading it is impossible for local people to use the roundabout and is regularly blocked. Turkey shore road is used by lorries accessing Eaton and other companies at the same site, Huws Gray, Hertz and the dock 'Dock Bach' These lorries also frequently park on the street. Stena have a long stay car park at the end of the road with buses continuously running to the port and during spring and summer into the town. Local bus companies use this route with buses running every 20 minutes and there is a bus stop along this road. When the houses at Yr Hen Iard Goed were constructed it was also identified that this road was being used by speeding cars and road bumps were put in place so

you must be aware that this road is not quiet. A number of people and companies go to Huws Gray for supplies. Residents use the road and then it is also used by people gaining access to the nursery and local primary school Ysgol Gynradd Llanfawr. The development would adversely affect highway safety for the convenience of road users

On Page 49 Of attached designing gypsy sites document available here, it states: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/11439/designinggypsites.pdf

9.3 Temporary stopping places should provide safe and convenient access to road networks and be located so as to cause **minimum disruption to surrounding communities.**

9.6 The road to and from the site must be of sufficient quality and size to enable access onto and off the site by heavy vehicles such as trailers.

Environment – Generally suitable but accessible to the dock which may pose health and safety risks when children on site.

In this you have considered the children of the Gypsies and Travellers but not of the local children. How will Anglesey County Council be aware if any of the occupants of the site posed a risk to children.

Schedule One Offenders

These are people who have been convicted of an offence against children. It is important to note that there is no register of Schedule One Offenders (see below). The Child Protection Register Administrator and the Probation Service hold lists of some known Schedule One offenders living in the county. The Police, through the Police National Computer, will have a record of any individual's offences and will know if the individual concerned is a Schedule One Offender. This information is accessed through the Section 47 enquiry. (It should be noted that there is currently a national review of the use of Schedule 1 - for further information please click here)

Taken from:-

<http://www.saferchildrenyork.org.uk/adults-who-pose-a-risk-to-children.htm>

On Page 49 Of attached designing gypsy sites document available here, it states: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/11439/designinggypsites.pdf

9.4 When considering the suitability of different sites, **the potential presence of young children and any risks that may arise due to adjoining land uses must be considered.**

Adjoining Usage-Some part of site are adjacent to community centre and residential properties. If bottom corner is used these need not be impacted significantly.

In this there is no mention of the nursery which I feel should be one of the first things considered as we care for young children and are open from 7am -6pm Monday to Friday. I have included some aerial photos to show how close this site would be to our outdoor area. It has a coastal path between us which could be used by anyone. This side of the nursery also has windows running all the way along so our playrooms would be able to be seen. It will also cause a visual impact to the nursery putting off perspective parents. It was discussed in the meeting at the London Road old peoples club on the 15th June 2016 that this area may not be used but the access road would still go past the nursery and you could not stop the Gypsies and Travellers using the coastal path or the Community centre.


In a letter we received from you on the 6th June 2016 you stated you would be contacting businesses, farmers and householders located in the close vicinity of the sites so that they are aware of the consultation and are able to take part. On speaking to local residents it has been identified that they had not been made aware and the first they knew of this was through us or through a post on our social media page which received 9026 views and 116 shares. Again we feel this is not appropriate and seems as if you wanted it to be kept quiet. This is something which will affect the people of Holyhead and it is only right that they should have been notified and been able to have their say. From this we have put together a petition which has been included and has been signed by 728 residents. We have removed signatures that we feel have signed on behalf of other people. This shows how strongly the people of Holyhead disagree with these sites.

A local resident has also brought to our attention that on this site there are Bee Orchids Growing and on research I have found this on <http://www.suffolkwildlifetrust.org/bee-orchids>

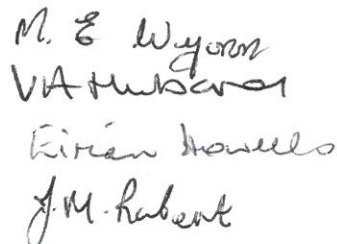
'The seeds germinate in the spring and can take as long as six years before they reach a flowering stage. **Bee orchids** are **protected**, as are all wild flowers, under Section 13 of the Wildlife and Countryside Act (1981). This section prohibits unauthorised and intentional uprooting of any wild plant.'

We would be grateful if you would consider the above points and we would like to receive your feedback and a report of the outcome and decision. If you would like any further information please do not hesitate to contact us

Yours Sincerely



Linda Williams (Manager) and the Directors of Meithrinfa Morlo Nursery



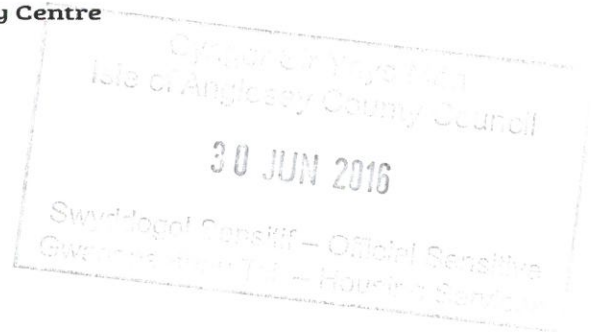
Not acknowledged



Canolfan Gymunedol Gwelfor
Gwelfor Community Centre

Housing Strategy and Development Manager
Anglesey County Council
Council Office
Llangefni
LL77 7TW

23rd June 2016



Consultation on Temporary Stopping Places for Gypsies and Travellers
Site 5 Tyddyn Lantern Farm, Holyhead

We the management of Gwelfor Community Centre and Directors of Morlo Regeneration Partnership, who are the owners of the centre strongly oppose Site 5 Tyddyn Lantern, Holyhead.

Gwelfor Community Centre has been part of the Morawelon Estate since the middle of the 1970's and is used regularly by the community of Morawelon and London Road. Attached is a timetable of all groups that regularly use the Centre. As you can see all age groups use the facilities but especially the most vulnerable in society, young children and the elderly.

We are raising the following concerns regarding the consultation meeting:

- In your letter, dated the 3rd of June 2016, you state that all householders in the close vicinity to the proposed site would be consulted. No householder living in Ffordd Tudur, who are exceptionally close to the proposed site, received a letter stating when the consultation would be held.
- At the meeting there was no head count to record the number of people attending the event. People's views were not being recorded, there was no response to people's concerns, they were just told to send a letter to the IACC and or fill in the questionnaire.

Our objections:

Accessibility – 3.5 - Access to Ferry Terminal less than 1km down narrow but quiet road.

If you can say that Turkey Shore Road is a quiet road, then what would you call a busy one? Along this road you have the following heavy traffic to and from the following:

- Businesses, namely Huw's Gray, Eaton, Hertz Car Hire, Meithrinfa Morlo Nursery together with small business in the area of Dock Bach where fishing Trawlers come in and the new H. M Custom House.
- Car Parks – Stena Short Stay near the beginning of Turkeyshore Road and the Stena Long Stay car park opposite the propose temporary site. The Long Stay Car Park is very well used and has a bus to take the passengers to and from the Port during sailing times.
- Housing – Yr Hen Iard Goed, mainly families; Bryn y Mor sheltered housing for the elderly and the entrance to Ffordd Tudur which leads to other parts of the large Morawelon Estate.
- There is a regular bus service which runs along Turkeyshore Road into Morawelon Estate. The Bus stop for Turkeyshore Road is opposite Bryn y Mor Estate.
- During working hours some of Huw's Gray employee's park along Turkeyshore Road.
- Stena and Irish Ferries have now 24 hour sailing therefore causing the proposed site to be used 24 hours, seven days a week 365 days a year (The Port remains closed Christmas Day and Boxing Day but the site could still be used).

Site -2.0 – Steep gradient onto site from road could make access to site problematic. Ground only level in parts with rocky outcrops.

It has been brought to our attention that the Bee Orchid (a wild flower) is growing in abundance on this proposed site which is protected under the Wildlife and Countryside Act 1981 – Section 13, uprooting these wild flowers may contravene this Act.

Availability -2.0 – private ownership so subject to agreement of owner

The proposed site known as Tyddyn Lantern Farm is at present privately owned by Gwynedd Shipping. To purchase this land and make it suitable as a site would cause great expense to the IACC and ultimately the council tax payers.

Environment -3.0 - Generally suitable but accessible to the dock which may pose health and safety risk when children on site

Here you have given consideration to the gypsy / traveller children, but what about the risks this site may pose to our local children and also the children attending the Meithrinfa Morlo Nursery, not even a stone's throw away from this site!

Adjoining Usage – 3.5 – Some parts of site are adjacent to community centre and residential properties. If bottom corner is used these need not be impacted significantly.

4.5.5 Temporary stopping places should provide safe and convenient access to road networks and be located as to cause minimum disruption to surrounding communities. Please also see Accessibility.

Health and Safety Risks to the community

In your report you state that some part of the site is adjacent to a Community Centre and residential properties. What about the Morlo Nursery attached to Gwelfor Community Centre? You do not refer to this in any part of your consultation document. The Nursery, a non profit making organisation, employing 18 local people, was built as a result of a community consultation with local residents and is well used by the local community. Parents have already stated that they would remove their children if the proposed site goes ahead. This could have a significant knock on effect on jobs and possible closure of this community asset, initially funded through EU and WAG. The Nursery's play area overlooks the proposed site.

Gwelfor Community Centre has a Parent and Toddler group, Youth Club, Rainbows and Brownies, who meet in the evening and all members are under 11years of age. Some parents do come and collect their children especially in winter but most walk home during light nights. There would be a big question on the safety of the children as no-one will know who will be staying on the proposed site. After school and at weekend's children and young people congregate outside Gwelfor to use the 'open play' equipment situated at the front of the centre.

The Coastal Footpath runs alongside the proposed site, Huws Gray, Meithrinfa Morlo Nursery, Gwelfor Community Centre and Eaton factory.

Another Health and Safety risk that needs to be considered is the nearby open space – Beibio Playing Field where unaccompanied young children play

From your Consultation report it appears that the Gypsies and Travelling Community have been consulted with, and everything to do with the site such as noise impact etc has to be taken into account. What about the noise to the local Community that this extra traffic will bring at all times during the day and night?

You don't seem to have taken into account the adverse effect this will have on the local residents e.g. falling house prices. What happens if the site is full and more turn up, where are they to go, on adjoining roads, or park in the community centre?

Have you taken into consideration that if horses are brought onto this site, where would they go?

You state that the site will be managed and the travellers who use it will be charged?

Who will monitor this site; it would need to be covered for 24hrs a day. Who will pay for all this? The council tax payers again?


This consultation is in regard to temporary stopping places for Gypsies and Travellers for a few nights. This would not be temporary for the community, for us this would be 365 days a year; this would be a permanent site.

The community made it overwhelmingly clear at the Drop-In Consultation event that they objected to having this site at Tyddyn Lantern Farm, we hope that this and all the above objections will be taken into account.

We look forward to receiving feedback from you and if you require further information please contact us on 01407 763559 or e mail gcc.1@btconnect.com.

Yours sincerely

On Behalf of Gwelfor Community Centre.....On Behalf of Morlo Partnership

Name 
Mr Allan Huband

Name 
Miss Eifiona Edwards

GWELFOR TIMETABLE

DATE April 2016

DAY	MAIN HALL	GYM
MONDAY	9am-2pm Lunch Club (For over 50's) 2pm-4pm Senior Citizen Club 6-7pm Sport Development (Children) Gwelfor Office 915am-1015am Christmas Hamper Collection	9.30am-1.30pm Foot Care (Every six weeks) 1030am-1230pm Credit Union 6pm-9pm Dog Training
TUESDAY	11am-1pm Men's Shed	6-7pm Exercise Class (Young people)
WEDNESDAY	10am-1pm Llaeth Marn (1 st & 3 rd Wednesday in the month) 1.30pm-3.30pm Bowlers (From 18 Oct 15 to April 2016) 6.15-7.45pm Youth Club (Under 11years)	1.30-3.30pm Friendship Club (Any age but mostly Senior Citizen) 4pm-5pm Rainbows (5-7 years)
THURSDAY	12.30pm-2.30pm Honey Bee's (Mother & Toddler Group) 6pm-9pm Nu Line Dance	6-7.30pm Brownies (7-11)
FRIDAY	1pm-3pm Gentle Exercise for over 50's	10.30am-12md Tai Chi (Any age)
SATURDAY	10am-12noon Gateway Club (Over 18 years)	
SUNDAY	1.30pm-4.30pm Bowlers (From 18 Oct 2015 to April 2016) 5pm-7pm Majorettes	

APPENDIX 11

EMAIL FROM DWR CYMRU

From: Griffiths Dewi [<mailto:Dewi.Griffiths@dwrwymru.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

If we've gone the extra mile to provide you with excellent service, let us know. You can nominate an individual or team for a Diolch award through our [website](#)

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



**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 whole 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.

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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 Ordovician 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

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 your 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.

Uwch Archaeolegydd Cynllunio ASHLEY BATTEN - *Senior Planning Archaeologist*

Cadeiryddes/Chair - Yr Athro/Professor Nancy Edwards, B.A., Ph.D, F.S.A. Prif Archaeolegydd/Chief Archaeologist - Andrew Davidson, B.A., M.I.F.A.

Site 3 Bryngwran – No Known Restraint

This parcel of land has limited archaeological potential. No known sites are within the area.

Site 4 Cyttir Road – Restraint

This site is to the north of the Parc Cybi development area. The development on the Parc Cybi site led to the discovery of extensive, multiphase archaeological remains of national significance, including a Neolithic house, later prehistoric settlement, Bronze Age multi-chambered barrow and a medieval cemetery. As such the Cyttir road site retains some potential for similar remains to survive. However, the Cyttir Road site comprises an already developed area in which it is likely that buried archaeological remains or deposits may have been disturbed and in which less extensive ground works might be required in order to facilitate the development of any proposed traveller site. As such there are some archaeological implications for this site but they would appear limited.

Site 5 Tyddyn Lantern Farm, Holyhead – No Known Restraint

It appears unlikely that a proposed development here would have any significant archaeological implications.

I have included an attachment with this letter which sets out how we define the level of constraint when responding to consultations from the JPPU.

I hope that the information provided here is clear, however if you have any questions or require further advice please do not hesitate to contact me.

Yours sincerely,

Ashley Batten
Senior Planning Archaeologist

Llywodraeth Archaeolegol Cynllunio - ASHLEY BATTEN *Senior Planning Archaeologist*

Cadeiryddes/Chair - Yr Athro/Professor Nancy Edwards, B.A., Ph.D, F.S.A. Prif Archaeolegydd/Chief Archaeologist - Andrew Davidson, B.A., M.I.F.A.

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

Llysoch Archaeolegyddol Cynllunio - ASHLEY BATTEN - *Swyddfa* Planning Archaeologist

Cadeiryddes/Chair - Yr Athro/Professor Nancy Edwards, B.A., Ph.D, F.S.A. Prif Archaeolegydd/Chief Archaeologist - Andrew Davidson, B.A., M.I.F.A.



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

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Status: Official Sensitive

Prepared by:

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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.

<u>SITE</u>	<u>Comments</u>
Site 1 - Strip of land between A55 / A5 between Llanfairpwll & Star Crossroads	<ul style="list-style-type: none">• The Economic Development section is supportive in principle - no major Economic Development issues envisaged.
Site 2 - Parcel of land at Gaerwen smallholding	<ul style="list-style-type: none">• The Economic Development section is not supportive of this proposal due to its close proximity to the £20m Menai Science Park development.
Site 3 - Land adjacent to the A5 near Cymunod Farm, Bryngwran	<ul style="list-style-type: none">• The Economic Development section has major concerns with this site as local businesses with property of high value are located in close proximity to the proposed site and this proposal could affect business.• 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

TEMPORARY STOPPING PLACES FOR GYPSIES & TRAVELLERS

	significant impact on this proposal.
Site 4 - Land at former farm, off Cyttir Road Holyhead (South of Kingsland School)	<ul style="list-style-type: none">• The Economic Development section has major 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	<ul style="list-style-type: none">• The R&ED Service has some 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 strongly of the opinion that the parcel of land at Gaerwen smallholding and land at 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 major concerns with the site 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

<u>SITE</u>	<u>Comments</u>
Site 1 - Strip of land between A55 / A5 between Llanfairpwll & Star Crossroads	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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)	<ul style="list-style-type: none"> • ‘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	<ul style="list-style-type: none"> • 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.

TEMPORARY STOPPING PLACES FOR GYPSIES & TRAVELLERS

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

<u>SITE</u>	<u>Comments</u>
Site 1 - Strip of land between A55 / A5 between Llanfairpwll & Star Crossroads	<ul style="list-style-type: none"> • This site does not have any immediate neighbouring properties – no access issues.
Site 2 - Parcel of land at Gaerwen smallholding	<ul style="list-style-type: none"> • This site does not have any immediate neighbouring properties – no access issues.
Site 3 - Land adjacent to the A5 near Cymunod Farm, Bryngwran	<ul style="list-style-type: none"> • 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)	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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.

TEMPORARY STOPPING PLACES FOR GYPSIES & TRAVELLERS

	<ul style="list-style-type: none">• 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.
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APPENDIX 4

Response from Highways Department, Isle of Anglesey County Council

**From John A Rowlands BEng. (Hons.)
Development Control Engineer**

Possible Temporary Stopping Places for Gypsy Traveller for Assessment 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 vision 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 Highways Authority would not accept any proposal which would involve vehicles parking or stopping temporarily on the highway while the access gates were being opened in the interest of highway safety.

Site 2 – Parcel of land at Gaerwen smallholding

Following a site visit carried out by IOACC Highway officers on 31.3.2016, the following comments were noted:-

The Highways Authority has no objections in principal to a new vehicular access being created on the boundary adjacent the existing A55 exit. The access would need to be designed and constructed in accordance with national guidance with vision splays achieved and secured before any other works commence on the development.

The road network leading up to the site is of good standard with good transport links to nearby villages and towns. There is a bus service located within Gaerwen village. There is no direct pedestrian link from the site to the nearest village.

The Highways Authority would not accept any proposal which would involve vehicles parking or stopping temporarily on the highway while the access gates were being opened in the interest of highway safety.

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

This existing access onto this parcel of land from the public highway is substandard in terms of visibility. If this site is used, an alternative access must be agreed with the highways Authority. If access is gained from the A5, a minimum vision splay of 2.4 metres x 215 metres should be achieved to comply with national guidance.

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

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 Highways Authority would not accept any proposal which would involve vehicles parking or stopping temporarily on the highway while the access gates were being opened in the interest of highway safety.

Site 4 – Land at former Farm, off Cytir 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 Highways Authority would not accept any proposal which would involve vehicles parking or stopping temporarily on the highway while the access gates were being opened in the interest of highway 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 Highways Authority would not accept any proposal which would involve vehicles parking or stopping temporarily on the highway while the access gates were being opened in the interest of highway 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 is 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.

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.

d) **Map Number 4 – Land near Cyttir Road, Holyhead.**

The proposal is within an area served by foul and surface water drainage systems; although the networks are not identified as on the definitive sewer maps as public sewers. These drainage systems are understood to be still in the ownership of Welsh Government, whose approval/consent would be required for any subsequent connections.

Public combined sewers are located within the adjacent Maes Cyttir Estate ; however any connection to this network may require the utilisation of a pumped system and would need the permission of the sewerage undertaker, Dwr Cymru Welsh Water.

No surface water flooding has been recorded on this land , however a scheme may be required to manage run-off from adjacent higher ground.

Surface water run off should be directed to suitably designed soakaways, or alternatively a positive outlet could be provided to existing drainage networks.

e) **Map Number 4 – Tyddyn Lantern Land, Holyhead.**

The site is within an area served by combined public sewers and any proposed connections would need to be agreed with the sewerage undertakers, Dwr Cymru Welsh Water.

A suitably designed scheme using soakaways, or alternatively providing a positive outfall to the sea, would be required for the drainage of surface water run-off from the land.

I trust these observations are of assistance.

Kevin Dogan

Kevin Dogan

Uwch Beiriannydd Cynorthwyol - Senior Assistant Engineer,

Adran Briffyrdd - Highways Department

Gwasanaeth Priffyrdd, Gwastraff ag Eiddo – Highways, Waste and Property Service

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