

Ein cyf/Our ref: CAS-284563-G1Q6
Eich cyf/Your ref: 13309

Isle of Anglesey County Council
Council Offices
Llangefni
Ynys Môn
LL77 7TW

Dyddiad/Date: 22 August 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: Consultation on the Integrated Sustainability Appraisal (ISA) as part of the preparation of the new Local Development Plan (LDP) for Anglesey.

LLEOLIAD/LOCATION: Ynys Môn / Anglesey

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 09 July 2025.

Our comments are provided in the context of our statutory role as a consultation body under the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004; our purpose is to ensure that the environment and natural resources of Wales are sustainably maintained, enhanced, and used now and in the future; and as advisers to Welsh Government on the natural heritage and resources of Wales and its coastal waters.

We consider the scope of the ISA is generally appropriate. We have the following comments structured according to our [consultation topics list](#). In relation to Designated Landscapes, we have included our detailed comments on each question in Annex 1.

Flood Risk

Chapter 4

Para 4.21. As all planning applications which are received/validated after 31/03/2025 will be considered under the 2025 TAN15: Development, flooding and coastal erosion, we would question whether the reference to the flood zone of the previous TAN15 (2004) is needed. It may be appropriate to clarify its purpose or consider its removal.

Para 4.22. Flood Zone 2 does not form the basis of Zone C. Flood Zone 2 includes an allowance for climate change on the 0.1% Annual Exceedance Probability event. We recommend revising this to reflect the correct technical definition.

Para 4.29. You may need to reconsider the inclusion of Llangefni here. Please view the latest communication from NRW on the town: [Natural Resources Wales / Update on flood](#)

[risk management in Llangefnj](#). Also, Malltraeth Marsh and Tyddyn y Cob (Y Fali) are protected by flood defence structures, which should be acknowledged.

Chapter 5

Table 5.1 ('*Some areas of high flood risk*' heading). It is understood that the Coastal Change Management Area policy within the adopted Joint LDP related to coastal erosion rather than flood risk.

We advise the ISA for the LDP should also include any evidence or risks from the third UK Climate Change Risk Assessment (CCRA3) work being led by Public Service Board (PSB).

Given the emphasis TAN 15 places on a plan-led approach, it is important that flood risk and climate change are addressed comprehensively in terms of evidence, strategy, and policy.

Sea level rise, coastal erosion, Shoreline Management Plan 2 (SMP2), coastal adaptation, and marine planning are all relevant factors that should be integrated into the ISA's flood risk and climate change assessments.

Please note that our remit in terms of flood risk management is limited to rivers and sea, we advise that other risk management authorities should input on other flood risk management areas, including the Lead Local Flood Authority.

Protected Sites

In relation to Question 2, you will be aware that there are a number of Sites of Special Scientific Interest (SSSIs) on Ynys Mon that are designated for their geological interest. However, we recommend that Sites of Nature Conservation (SINCs) (Conservation / Biodiversity) and Regionally Important Geological Sites (RIGS) (Geology) are included in the baseline as these form an important secondary (non-statutory) component for biodiversity and geological interest.

Water quality

In relation to Question 2, we advise that details are included of the number of catchments on Ynys Mon failing to achieve good or high status as this is an important driver to determine measures to address water quality and ecological factors.

Designated Landscape

We welcome the ISA Scoping Report's recognition of landscape issues; however we have detailed comments (see Annex 1 below) on all 5 questions which we advise are considered further in your preparation of the next stages of the ISA.

We hope these comments are of assistance. If you have any queries on the above, please do not hesitate to contact us.

We will be happy to provide further advice and guidance in the latter stages of the ISA and look forward to working with you on the LDP.

Yn gywir / Yours faithfully,

Rhys Jones

Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning
Cyfoeth Naturiol Cymru/Natural Resources Wales

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---- CONTINUED (ANNEX 1) -----

ANNEX 1

Designated Landscapes

Our landscape planning advice relates to the landscape character and visual amenity of the Ynys Môn National Landscape (YMNL), the name for the legally designated Area of Outstanding Natural Beauty (AONB), and the statutory purpose of the designation to conserve and enhance its natural beauty.

Question One: Are any key documents or messages missing from the policy context review carried out for each Integrated Sustainability Appraisal theme?

Chapter 3 of the ISA Scoping report includes relevant plans and policies relating to international, national and local issues with section 3.26 referencing landscape, soils and green infrastructure. We have cross referenced the Plans, and Policies which relate to Landscape matters with Annex A and section 3.26 of the ISA Scoping report, and we would expect the following to be included or referenced. Where these are not apparent in the report we have flagged these as “No” and provided links to the policies flagged.

Document Title	Year Published	Present or not
<i>The Infrastructure (Wales) Act</i>	2024	Yes
<i>Planning Wales Act</i>	2015	Yes
<i>Well-being of Future Generations (Wales) Act</i>	2015	Yes
<i>Environment (Wales) Act</i>	2016	Yes
<i>One Wales: One Planet – The Sustainable Development Scheme of the Welsh Assembly Government</i>	2009	Yes
<i>Future Wales The National Plan 2040</i>	2021	Yes
<i>Planning Policy Wales (Edition 12)</i>	2024	Yes
<i>Building Better Places</i>	2020	Yes
<i>Energy Wales: A Low Carbon Transition (2012)</i>	2012	Yes
<i>Technical Advice Note 3: Simplified Planning Zones</i>	1996	Yes
<i>TAN2: Planning and Affordable Housing</i>	2006	Yes
<i>Technical Advice Note (TAN) 6: Planning for Sustainable Rural Communities</i>	2010	Yes
<i>Technical Advice Note (TAN) 7: Outdoor advertisement control</i>	1996	Yes
<i>Technical Advice Note (TAN) 10: Tree preservation orders</i>	1997	Yes
<i>Technical Advice Note (TAN) 12: Design</i>	2016	Yes
<i>TAN13: Tourism</i>	1997	Yes
<i>TAN14: Coastal Planning</i>	2021	Yes
<i>TAN 16: Sport, Recreation and Open Space</i>	2009	Yes
<u>LANDMAP including Using LANDMAP in Landscape and Visual Impact Assessments GN46</u>		No
<u>National Landscape Character Areas</u>		No
<u>Placemaking Wales Charter</u>	2020	No

<u>Good Practice Guidance – Planning for the conservation and enhancement of dark skies in Wales</u>	2024	No
<i>European Landscape Convention 2000</i>	2007	Yes
<i>Renewed EU Sustainable Development Strategy</i>	2009	Yes
<i>Natural Resources Policy</i>	2017	Yes
<i>Woodlands for Wales Strategy</i>	2018	Yes
<i>North Wales Regional Plan 2023 to 2028</i>	2017	Yes
<i>Natural Resources Wales North West Wales Area Statement</i>		Yes
<i>Conwy Local Development Plan 2007-2022</i>	2013	Yes
<i>Denbighshire Local Development Plan 2006-2021</i>	2013	Yes
<i>Flintshire Local Development Plan 2015-2030</i>	2023	Yes
<i>Eryri Local Development Plan 2016-2031</i>	2019	Yes
<i>Anglesey and Gwynedd Joint Local Development Plan 2011 -2026 (2017)</i>		Yes
<i>Anglesey Supplementary Planning Guidance – specifically Open Spaces, Onshore Wind Energy, Design for the Urban and Rural Environment,</i>		Yes
<i>Ynys Mon Area of Outstanding Natural Beauty Management Plan 2023-2028</i>		Yes
<u>Guidance for relevant authorities on the Protected Landscapes duty (CRoW Act 2000)</u>	2025	No
<u>Natural Resources Wales / Guidance for planning applications for telecommunications apparatus in designated and sensitive landscapes</u>	2024	No
<u>Review of Special Landscape Areas in Gwynedd and Anglesey</u>	2012	No
<u>Anglesey Landscape Strategy Update</u>	2011	No

The narrative on page 17 (Implications on the LDP and SA) confirms that important landscapes should be protected and highlights the need to take account of non-designated sensitive landscapes. We advise that in all developments a landscape-led approach is desirable to maximise the benefits of development, for people, place and nature.

Question Two: Are there any key data sources or trends missing from the baseline information for each?

Chapter 4 of the Scoping Report provides the baseline information for the ISA. Section 4.45 focuses on Landscape.

- We welcome the reference to National Landscape Character areas and special landscape areas (these should be referenced in the policy context annex A).
- Whilst national seascapes are referenced at 4.50, Local Seascape Character Areas are not referenced. These should link to the Anglesey Seascape Character Assessment (2013). The only reference to seascapes within the scoping report is 4.50 and cites 9 regional seascape units within the North Wales and Caernarfon Bay national seascape. The Anglesey Seascape Character Assessment identifies thirty-six Seascape Character Areas (SCA's), nine of which are entirely offshore. As pressures on offshore energy and cabling increase it will be important that the ISA and LDP recognise these SCA's and ensure that their characteristics and special qualities are reflected in the LDP.

- Whilst not a designated dark skies reserve or dark skies park, Ynys Mon does include some of the darkest skies in Wales which contributes to its special qualities and the landscape experience. Further data relating to the extent of dark skies in Ynys Mon is available here: [Dark Skies and Light Pollution Report - Final.pdf](#)
- Supporting evidence for a landscape led approach to development is available here: [Supporting evidence for a landscape-led approach to development - Landscape Institute](#).

Question Three: Do you have any comments on the identified key issues for each Integrated Sustainability Appraisal Theme?

Chapter 5 flags the key issues identified and these are described in table 5.1. It would be helpful if these were numbered for ease of reference. Landscape issues are mainly flagged in the following sections:

- The need to protect and enhance the sensitive landscape, particularly around the Anglesey National Landscape.
- Shortages in open space provision including sports facilities and playing pitches.

We agree with the assessment of likely evolution without the LDP, but the issue of seascapes also needs to be flagged. Potential risks and benefits relating to small and larger scale renewable energy, including solar, carbon capture and hydrogen, on and offshore wind and its infrastructure are not flagged.

Question Four: Do you have any comments on the Integrated Sustainability Appraisal objectives and/ or assessment questions for each Integrated Sustainability Appraisal theme?

Section 6 of the ISA describes development of a set of ISA objectives through a framework document (table 6.1) and looks at how delivering ISA goals relate to Strategic Environmental Regulations and other assessment processes.

Landscape matters are mainly included in ISA Objective 8 to **Protect and enhance the quality and character of the landscape**. As previously flagged, this objective needs to include seascapes. We agree with the inclusion of dark skies and tranquillity.

Question Five: Do you have any other comments on the Integrated Sustainability Appraisal Scoping Report?

Many of the objectives in the ISA have potential to cross-reference with other objectives and in reality, policies do frequently relate to numerous objectives and purposes. The sustainability appraisal will need to identify where key cross-overs and potential conflicts lie to help future-proof the LDP and enable multi-faceted decision-making that safeguards sustainability principles.

This is very clearly apparent in landscape matters. For example, achieving balance between *Objective 8 Landscape* and *Objective 14 a Sustainable Economy* may be assisted by clear Supplementary Planning Guidance and detailed Landscape Sensitivity and Capacity studies. The 'Isle of Anglesey, Gwynedd and Snowdonia National Park Landscape Sensitivity and Capacity Study' (Gillespies, 2014) is an example of how this has been provided historically. The ISA may be helpful in highlighting areas where the balance between landscape and other objectives is not clearly articulated and how this may be addressed in future. We would welcome this.

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