

Ein cyf/Our ref: CAS-284283-S7S8
Eich cyf/Your ref: HRA Scoping Consultation

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

Dyddiad/Date: 22 August 2025

Dear Sir/Madam,

**ANGLESEY LOCAL DEVELOPMENT PLAN (LDP) – CONSULTATION ON THE
HABITATS REGULATIONS ASSESSMENT (HRA) SCOPING REPORT**

Thank you for consulting us on the HRA Scoping Report for the Anglesey LDP prepared by LUC (dated 2/5/2025).

We note section 5.3 of the HRA Scoping Report requests our advice as to whether:

- the report has identified the European sites that should be scoped into the HRA,
- the report has correctly identified the sensitivities of the scoped-in European sites,
- the proposed approach to HRA is reasonable.

In response to the final bullet point, we consider the proposed approach to HRA Scoping to be reasonable.

With respect to the first two bullet points, we consider the HRA to have identified the correct sites and sensitivities in most cases, however we have the following advice which should be considered further prior to preparation of a HRA screening report, and appropriate assessment where required.

1. In respect of water quality (water treatment and discharge), section 4.73 of the HRA Scoping Report states: *‘A review of European sites identified by NRW confirmed that there were no European sites hydrologically connected to Anglesey, which are in unfavourable condition and as such no impacts are predicted in relation to this impact pathway. All European sites have therefore been scoped out from further assessment’.*

However, your Report predates the publication of NRW’s updated conservation advice packages (Regulation 37 advice) for the marine Special Area of Conservation (SAC) and Special Protection Areas (SPAs). The updated condition assessments have concluded that nutrient sensitive features at some sites are in unfavourable condition for both chemical (Dissolved Inorganic Nitrogen [DIN]) and biological (phytoplankton and opportunistic macroalgae) indicators of nitrogen enrichment.

Following publication of the updated conservation advice packages, we have developed interim advice for Planning Authorities which was circulated to all the Chief Planners on 25 July 2025. This advice is now available on our [website](#). This advice specifically refers to the Cemlyn Lagoon (Cemlyn Bay SAC) which has been identified as having sensitive features, where nutrient inputs from freshwater catchments may be contributing to a failure to meet the site's conservation objectives.

We therefore refer you to the advice on our website and suggest you will need to take this into account and amend your HRA Scoping Report accordingly.

2. We advise that the Report is reviewed to ensure that all European site features are correctly identified; there are instances where the incorrect site features are listed e.g. the Menai Strait and Conwy Bay SAC is designated for its habitat features only, the Holy Island Coast SAC is not designated for grey seal (page14). In addition, otters are not a feature of Glynllifon SAC, whose sole feature is lesser horseshoe bats. This has a knock-on effect on the rest of the Report and some impact pathways may be able to be screened out as a result.
3. In relation to marine mammals, we have guidance available to competent authorities conducting HRAs on the use of marine mammal management units [Natural Resources Wales / Marine mammal management units in habitat regulations assessments](#).
4. The North Anglesey Marine SAC has been screened out for the impact pathway 'physical loss of habitat – functionally linked habitat' (section 4.10), however the justification provided contradicts the previous section (4.4) where the SAC is screened in for 'physical damage and loss of habitat – onsite'. We also question why the North Anglesey Marine SAC has been screened in for the impact pathway 'non-toxic contamination' while the marine SPAs have been screened out (section 4.50). We advise this section is reviewed.
5. With respect to functional linkage, we advise that the Dyfi SPA is 'scoped in' to the Screening stage. One of the features of the Dyfi SPA is its population of Greenland white-fronted geese. The global wintering range of the population falls entirely within Britain and Ireland. In Wales, wintering Greenland white-fronted geese are restricted to two key sites, the Dyfi Estuary SPA and Anglesey, and number less than 40 birds. We consider there is potential for habitats on Anglesey to be potentially functionally linked with the SPA. We therefore advise that the Dyfi SPA is 'scoped in' to the HRA Screening Report that will be prepared.
6. Paragraph 4.18 of the HRA Scoping Report states the following: "*Great crested newt will typically disperse up to 500m away from breeding ponds and therefore this range has been applied to assess for impacts on functionally linked habitat. Anglesey Fens SAC, Abermenai to Aberffraw Dunes SAC and Glan-traeth SAC are all within Anglesey and have therefore been scoped in for further assessment at Screening stage*". We agree that these sites should be scoped in, however, we advise that GCN may disperse up to 1.6km¹ and therefore the Screening stage will need to consider this distance with respect to assessing impacts on functionally linked habitat.

¹ Bernhard, T., Driver, D., Dyer, S., Edgar, P., Ellis, M., Foster, J., Howe, E., McKinnell, J., and Raynor, R. 2022. Guidelines for the Selection of Biological SSSIs. Part 2: Detailed Guidelines for Habitats and Species Groups. Chapter 18 Reptiles and Amphibians. Joint Nature Conservation Committee, Peterborough. Link to the document [here](#).

7. We note that the Air Quality section of the HRA Scoping Report focuses on construction traffic. However, there is no consideration of air pollution from ammonia, such as from agricultural developments. European sites that are currently proposed to be 'scoped out' in terms of air pollution could be affected by agricultural developments. We advise that the HRA Scoping Report is reviewed and that sites sensitive to ammonia pollution are identified and scoped into the Screening Report that will be prepared. Further information is available on [our website](#) and on [APIS](#). Please contact us if you require further assistance with respect to identifying the sensitive sites.

The comments we have provided are made without prejudice to any comments we may wish to make when consulted on any subsequent HRA consultations. At the time, there may also be new information available which we will need to take into account when making a formal response.

If you wish to discuss further, or require clarification or further information, please do not hesitate to get in touch.

Yn gywir / Yours faithfully,

Rhys Jones

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

E-bost/E-mail: northplanning@cyfoethnaturiolcymru.gov.uk

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi./Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.