

## 7.1

### Gweddill y Ceisiadau

### Remainder Applications

Rhif y Cais: **16C119B** Application Number

Ymgeisydd Applicant

**Mr Neil Forrest Owen  
Pen yr Orsedd  
Engedi  
Ynys Môn  
LL65 3SD**

Cais llawn ar gyfer codi adeilad ar gyfer darparu  
gweithdy a swyddfa yn

Full application for the erection of a building to  
provide a workshop and office at

Pen yr Orsedd, Engedi



**Planning Committee: 06/11/2013**

**Report of Head of Planning Service (AMG)**

**Recommendation:**

Refusal

**1. Members Reason for Approving**

- i) Retention of jobs in the countryside
- ii)

**2. Officer's Response to Reason for Refusing**

i) The proposal is located within the countryside on the outskirts of Engedi. The proposal lies outside the development boundary of the settlements referred to in the Ynys Môn Local Plan and the Stopped Unitary Development Plan and is not allocated for any specific uses. National and local policies seek to discourage economic development (other than agricultural or farm diversification) on sites in the open countryside. Where possible employment sites should be located within or adjacent to existing settlements. New building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled.

The information provided indicates that the proposed workshop would be used partly for purposes incidental to the enjoyment of the dwellinghouse, and partly in connection with the applicant's joinery business. The lease of the workshop the applicant currently uses is about to come to an end thus making the future of the business uncertain. The applicant has stated that the proposal is the only viable and sustainable option for his personal circumstances, as he cannot afford to buy a commercial site or rent an industrial unit. Committee members must decide if they consider this information to be sufficiently robust so as to constitute an evidential basis to approve the application. However, the officers do not consider that this would justify allowing the proposal in this location.

**3. Recommendation**

**Refusal**

(01) The applicant has not demonstrated that there are exceptional circumstances including specific locational requirements and economic benefits to justify allowing the proposal. The proposal is therefore contrary to Policy 2 of the Ynys Môn Local Plan.

## 7.2

Ceisiadau'n Tynnu'n Groes

Departure Applications

Rhif y Cais: **39C285D** Application Number

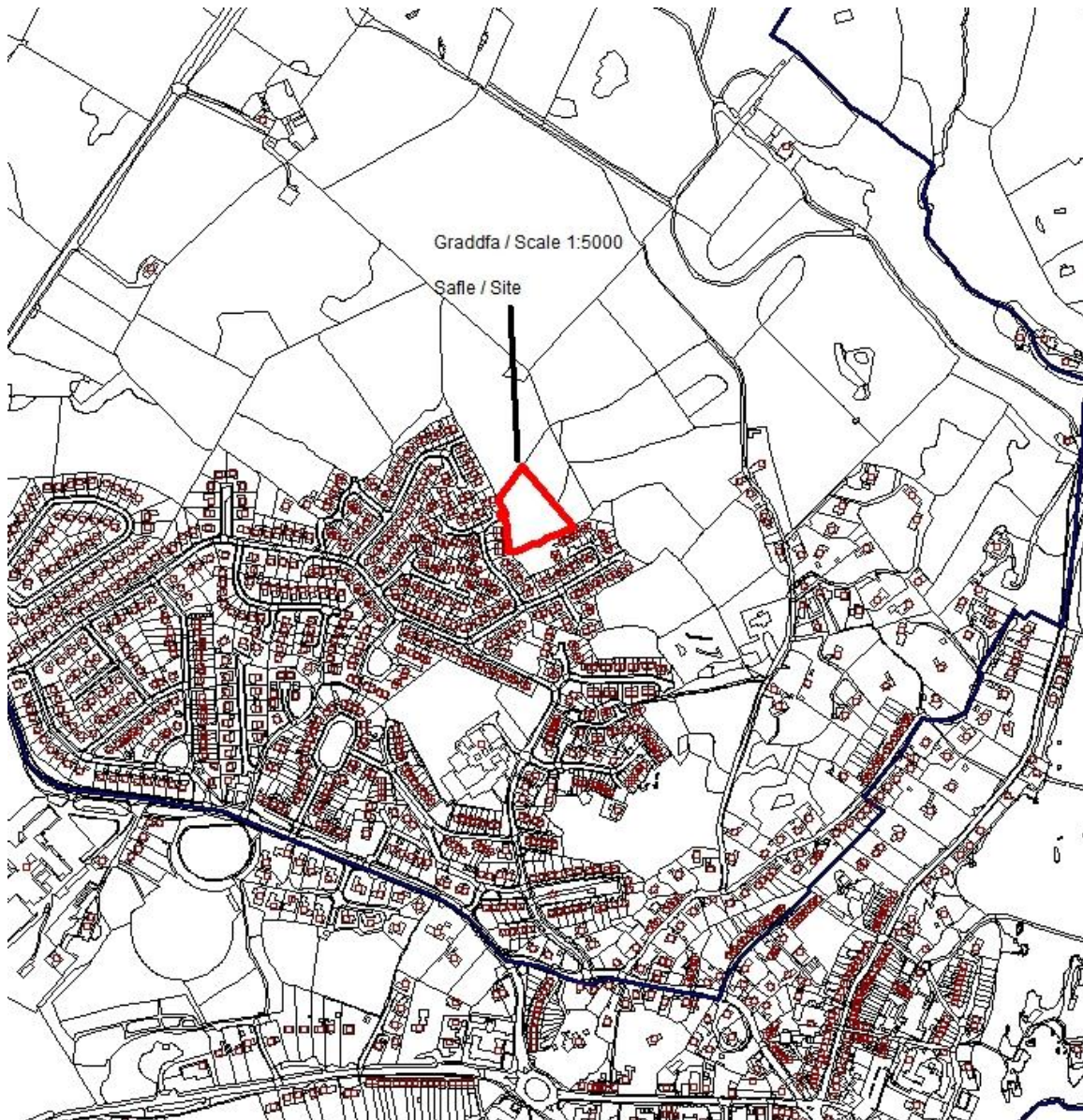
Ymgeisydd Applicant

**Bennett Homes  
c/o J S Allan RIBA  
Gerallt  
3 Stâd Castellor  
Cemaes  
Ynys Môn  
LL67 0NP**

Cais llawn ar gyfer codi 17 o dai ar dir yn

Full application for the erection of 17 dwellings on land at

Lon Gamfa, Menai Bridge



## **Planning Committee: 06/11/2013**

### **Report of Head of Planning Service (DPJ)**

#### **Recommendation:**

Permit

#### **Reason for Reporting to Committee:**

The planning application is being reported to the planning committee as it comprises a departure from the development plan which officers are minded to approve.

There have been site visits by the Planning Committee in January 2013 and by the current members of the Planning Committee in October.

#### **1. Proposal and Site**

The planning application is made for 17 two storey, three bedroom dwellings and associated highway and drainage works. The associated highway works include a proposal for a chicane priority system at the entrance to the development, with priority for traffic entering the proposed development.

#### **2. Key Issue(s)**

- Principle of Development.
- Other Material considerations.

#### **3. Main Policies**

##### **Gwynedd Structure Plan**

A2 (Housing Land)  
A3 (Scale of Housing Development)  
A6 (New Dwellings in the Countryside)  
A9 (Affordable Housing)  
D4 (Siting)

##### **Ynys Môn Local Plan**

1 (General Policy)  
26 (Car Parking)  
33 (Nature Conservation)  
34 Nature Conservation)  
42 (Design)  
48 (Housing Development Criteria)  
49 (Defined Settlements)  
51 (Large Sites)  
53 (Houses in the Countryside)

##### **Stopped Anglesey Unitary Development Plan**

GP1 (Development Control Guidance)  
GP2 (Design)  
TR10 (Parking Standards)  
EN4 (Biodiversity)  
EN7 (Local Sites)  
EN14 (Tree Preservation Orders and Hedgerows)

EN16 (Landscape Features of Major Importance to Flora & Fauna)  
HP2 (Housing Density)  
HP3 (New Housing Development – Main & Secondary Centres)  
HP7 (Affordable Housing)  
SG1 (Contaminated Land)  
SG2 (Flood Risk)  
SG3 (Controlled Waters)  
SG4 (Foul Sewage Disposal)

SG6 (Surface Water Run Off)

**SPG Affordable Housing (2004)**

**SPG Isle of Anglesey Council Design in the Urban and Rural Built Environment (March 2008)**

**Planning Policy Wales Edition 5 (November 2012)**

**Technical Advice Note 2: Planning and Affordable Housing (2006)**

**Technical Advice Note 5: Nature Conservation and Planning (2009)**

**Technical Advice Note 12: Design (2009)**

**Technical Advice Note 18: Transport (2007)**

#### **4. Response to Consultation and Publicity**

**Town Council** Recommend refusal on the following grounds:

- Density and over development together with land locking which could result in this Council and the County Council being in breach of Section 17 of the Crime and Disorder Act.
- Road Access and Highways to the existing estates are dangerous, narrow non-standard width roads
- 'Rat run' sub-standard road with an increased risk, particularly to children, whilst gaining access to the adjacent school and public playing field.
- The increase in the existing density of traffic for cars and commercial lorries.
- High voltage power lines - danger to inhabitants and particularly children - advice required from Power Company due to health and safety grounds.
- Flooding and natural springs - This used to be the first main water supply to Menai Bridge due to natural springs. The area is subject to flooding and known to flood regularly.
- The residents of the area have great concerns regarding surface water etc. and can provide photographic evidence.
- As local Council we recommend that this land development is not fit for any development whatsoever due to natural springs.
- Culvert overflow.
- Sewerage - The only difference between the previous plan and the new plan – it has been highlighted that the actual pipework is substantial. Route of existing pipework goes through private properties. Connecting the 18 houses to the existing private sewer will increase the problems and risk to private land and property and existing householders before it reaches the public sewer which is already overloaded. This will cause flooding within the main town of Menai Bridge due to Dwr Cymru not updating the pipes. Other developers in the area have been forced to install a pump. Dwr Cymru met Representatives of Menai Bridge Town Council regarding the Ty Mawr Development, Llanfairpwll, when it was pointed out to the Water Authority that the existing pipe work from Four Crosses down to Britannia Garage has not been ungraded and it was stated that no further development within the top end of Menai Bridge should be allowed due to this inadequacy in the Tysilio Ward.

**Councillor Jim Evans** No observations received.

**Councillor Meirion Jones** No observations received.

**Councillor Alun Wyn Mummery** No observations received.

**Former Local Member** Submitted the following observations:

This application has been within the Planning Department for many years & has been subject to many changes since the local member was in office. There are 26 residents in proximity who have grave concerns and have written in with their observations.

The whole of Penlon has been built over many decades with narrow highway widths, residents park their vehicles on the sides of roads, this is a natural convenience for out of office hours and weekends.

There are three highway accesses from this vast housing area from Pentraeth Road (Four Crosses, from

Pentraeth Road, Siop Newydd and Cil y Graig. Cil y Graig is sub-standard and narrow due to on-street parking. This application will create 50 vehicle movements together with associated deliveries.

The proposed "Chicane" priority system will likely result in accidents, as the design is dependent on the good nature of those entering/leaving the estate.

In a further letter he explains that he has grave concerns regarding the development of the site.

1. As the highway access throughout the whole Penlon area is at a critical stage with on street parking, narrow width roads, with only 3 access or returns for traffic, ie Cil y Graig, Penlon onto Pentreath Road and Cae Tros Lon Estate. The Menai Mon Travel to work traffic use this part of Menai Bridge as rat runs, to either pass by pass the David Hughes School snarl ups or to access the Ysgol y Bont in Tyddyn Mostyn daily.
2. The development site has a long history of flooding from boggy land; many years ago the landowner filled in the land with dumped material and raised the ground level. Instead of lessening the outfall of water from the site this has made it even worse than before.
3. The houses will tower over the existing bungalows surrounding the development site in Lon y Gamfa, encouraging viewing into the private area of existing gardens.
4. I have grave concerns about the surface water drainage from the development site – there is historical evidence of flooding from the site to adjoining properties. No 18 Lon y Gamfa's properties and gardens are continuously feeling the effect of flooding, and so are neighbouring properties opposite and adjoining no 18. The gardens surrounding the property are continuously feeling the effect of flooding, and so are neighbouring properties opposite and adjoining no 18. The gardens surrounding the property are continuously being flooded; the surface water cannot be removed or drained as the ground has 6 inches of mud under it. This property was built by the applicant developers so they are very much aware of the damage done to this property.
5. The revised planning directions for the surface water (letter from the architect to Head of Planning 25.10.12 does not give much confidence to people living in the vicinity.
6. The attenuation tank, storm cells and rainwater butts have been raised to a 30 year flood warning, these will not be able to cope with the massive strength of surface water coming down from the fields of the surrounding area. The development site is a "Boggy Sink" where all the surface water travels down to the site. When these tanks are full will the existing surface water drainage cope with the outflow, if these are damaged how often will the developers come and check/repair the equipment. Will the blockage be monitored regularly?
7. The local member wishes the Planning Committee members to walk the development site and advises them to bring their wellingtons.
8. Most of the surrounding properties have un-adopted sewage facilities – are they up to lawful standards?
9. There is a land locked area between the development land and Gilfach Goch, in the past youngsters have been building bonfires there, will the developers be using this for building plots in the future?
10. Will the newly built properties be affordable housing and what percentage of the new build will be?
11. There is a great danger for traffic moving off the site will cause speeding and accidents to existing property owners, will there be sleeping policemen installed in the future, and appropriate highway signage.
12. Should the present developer sell off the land to another developer, can we make sure that any conditions on the planning application are strongly enforced.
13. The development site with 17 new houses may have as many as 50 owner vehicles, plus delivery vans, lorries to the site – the present road structure will not cope with this massive increase in volume of traffic in this part of Penlon.
14. In a meeting with Welsh Water and Menai Bridge Town Council many years ago, water board managers indicated that the volume of surface water and sewerage passing through Menai Bridge from the housing estates down to the Britannia roundabout would mean that the system would not be able to cope with any extra volume, and that serious investment should be looked at in the future.

In a separate letter it was indicated the local member wished the application to be reported to the planning committee on highway grounds.

**Highways** Conditional permission notably requiring the provision of a chicane at the entrance to the development. Also required that the proposed chicane was subject to a safety audit by external engineers which has been undertaken and is acceptable.

**Drainage** The surface water drainage system and supporting calculations are generally satisfactory subject to a suitably worded planning condition to cover outstanding aspects. In addition the applicant should be

advised that culverting of the existing ditches will require the express approval of this authority under section 23 of the Land Drainage Act 1991.

**Building Control** The 3.1 meter width between the kerbs of the “chicane entrance” will be acceptable in this instance.

**Ecological Adviser** Satisfied with the ecological information submitted as part of the planning application. Subsequently also recommended that the buffer for the site could be achieved as part of the provisions of a landscaping scheme along the boundaries which retains mature trees noted in the ecological report.

The Ecological Adviser has also responded to one of the objections below and explained why requesting a bat survey in connection with the development could not be justified on this site.

**Affordable Housing Adviser** Recommended that 6 affordable homes at 85% of the market value are provided, with a detailed review of income and costs after completion.

**Natural Resources Wales** The surface water proposals are acceptable subject to surface water being attenuated and stored on site as per the condition recommended, then the discharge rates should remain unchanged and flood/drainage risk should not be increased. Have also investigated leachate originating from the application site and decided not to instigate any proceedings in this regard.

No objections are raised to the development on nature conservation grounds but they have made a number of observations as regard the ecological report which have been included as conditions or informatives as appropriate.

**Environmental Services** Conditions and informatives recommended as regards construction activities and contaminated land.

**Welsh Water** Conditional permission and have confirmed that the foul drainage arrangements are acceptable. They have also confirmed that the public sewerage system in the vicinity of the development can accommodate foul drainage flows from the development and they have commented on specific instances of blockage in the objections received.

**Fire Service** No observations as regards water supplies or access to the development by fire appliances.

**Scottish Power** No observations received.

**North Wales Wildlife Trust** The proposed development lies immediately adjacent to our Caeau Pen y Clip Nature Reserve along its south-west boundary. This area of the reserve is marshy with areas of standing water at various times of the year. We would welcome an indication of how surface run-off from the development will be prevented from entering the reserve; it is likely that this run-off could be contaminated in various ways. The nature reserve is grazed for 5-6 months of the year and we stress that the boundary must remain intact at all times. One of the key features of our nature reserve is its species rich hedgerows. The Landscaping Plan appears to indicate that a 2m wide hedge of various non-native species will be created around the development. We would strongly recommend that these are replaced with native species, especially on the south- western boundary.

## **Response to Publicity**

43 letters received objecting to the planning application on the following grounds:

- Access & traffic considerations, during and following construction.
- Who will be responsible for the repair of Lon y Gamfa following the use by construction traffic?
- Penlon is already congested. Writers point to a danger spot at the corner of Penlon/Cilgraig.
- Emergency services refuse vehicles and commercial vehicles currently have difficulty accessing properties in this part of the estate.
- Concern regarding ingress and access at 55 Lon y Gamfa and the narrowness of the access to the development. The normal road width in the estate is 8.5 meters whereas outside 55 it is reduced to 4.150. The writer states that there should also be a pavement in front of their property but that this would reduce the width further to 2.650 meters. The lack of a footpath in front of the writers property means that people will leave the estate on the writer's side.
- One writer states that the drawing are deceptive regarding the chicane and it is noteworthy that the footpath ends at the garden wall with no pedestrian access immediately outside the entrance to the

- property
- Risk to children playing in the street.
- Unsafe access for cyclists and pedestrians.
- Parking implications
- Sewerage - One writer states that they had the main sewer backing up and releasing its contents all over their property a further 17 homes linking into the sewer this would again put severe pressure on a system that is already at its limits and not large enough to cope with the houses there at present.
- Invasion of privacy & overlooking of bedrooms.
- Flooding. Noted that the stream that runs to a culvert in Lon y Gamfa floods into gardens and the road. Other writers refer to there being springs on the site.
- Effect on the flow characteristics of the stream.
- Fire as there is no direct access to the land.
- Density of the development.
- No change since last planning application applications.
- Queried whether building should take place near an electric pole. This could be detrimental to the health of occupants.
- Development will be detrimental to wildlife & flora using the green area.
- Effect on the amenities of existing properties in the locality by virtue of overlooking, traffic, noise, pollution, inconvenience.
- Affordable housing element questioned and queried.
- The site is outside the boundary in the Ynys Mon Local Plan. The more recent LDP showed a line around the site but this was never approved.
- Existing dwellings already for sale in the area.
- Economic outlook could mean that the houses would be empty.
- Empty properties result in increased crime rates.
- Design of the submitted drainage system is unacceptable and would not be maintained by the developers.
- The development is on a conservation area/green belt for the Menai Bridge area.
- Increase in litter and waste disposal.
- The writer states that they believe that any development of the land will affect their ability to sell their house.
- The estate is already big enough.
- De-valuation of adjacent properties.
- Queried whether a bat survey has been undertaken and the writer states that they have seen bats in the area.
- Adequacy of the surface water regulation arrangements queried.
- Safety of children playing.

A letter has been received from the former Assembly Member requesting that full consideration is provided to views of constituents in determining the planning application. In a further letter the objections of a constituent are enclosed and it is requested that they are considered in determining the planning application.

One letter has also been received from the Member of Parliament describing the concerns of one of his constituents, grounds of which are contained in those listed above.

## **5. Relevant Planning History**

**39C285:** Residential Development. Withdrawn -09.08.00.

**39C285A:** Modification of Section 106 Agreement attached to planning permission 39C83 so as to discharge the section relating to the formation of a play area. Approved - 04.02.99

**39C285B:** Residential development. Refused on the 10.11.99 on the grounds that the site would be in the countryside and in contravention of policy, also on the grounds that the existing surface water and land drainage systems are not suitable to take additional surface water development.

**39C285C:** Outline application for residential development and construction of a new access. Withdrawn - 17.04.2008

**39C285E/SCR:** Screening Opinion. No EIA required - 15.08.2007.



## **6. Main Planning Considerations**

### **Principle of Residential**

Having regard to the provisions of section 38(6) of the 2004 and act, if regard is to be had to the development plan for the purposes of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise. The development plan for Anglesey comprises the approved Gwynedd Structure Plan (approved November 1993) and the adopted Ynys Mon Local Plan (adopted December 1996).

The application site is located outside but adjoining the settlement boundary of Menai Bridge in the adopted Ynys Mon Local Plan (December 1996), and is therefore in the countryside. The application has therefore been advertised as a departure from policies A6 of the Gwynedd Structure Plan and 53 of the Ynys Mon Local Plan.

In the Stopped Ynys Mon Unitary Development Plan 2005 the application site is located within the settlement boundary. Given the advanced stage reached in the preparation of this plan weight can be attributed to its provisions such as to outweigh the provisions of the development plan and the principle of the development is acceptable subject to the detailed considerations listed below.

### **Highway Parking & Safety Considerations**

The development would be accessed from the public highway with a priority system connecting the development from Lon y Gamfa and this has been the subject of a Safety Audit report by Engineers in connection with this part of the development which is accepted by the council's Highways section. Some of the objections received point to difficulties faced by emergency vehicles notably the Fire Service in reaching the site via "Cil y Graig" where parked vehicles reduce the width of the carriageway and via the proposed chicane by virtue of its width. No objections are raised on this basis by North Wales Fire Service in terms of the width of either of these means of access. The council's Building Control Section has also confirmed that 3.1 m width of the proposed chicane is acceptable in terms of emergency vehicle access.

Many of the objections received relate to the adequacy of the surrounding highway network and in particular parts of "Penlon" & "Cil y Graig". No objections are raised to the Planning Application on these grounds by the Highways Section as they consider that the highway network can adequately cater for the scale of development subject to this report.

It is understood that in separate non statutory process that the developer has agreed to make a payment of £10,000 towards improvements, traffic calming which will be ring fenced in connection with this development. The Highways Section will then monitor the development for a 12 month period following the occupation of the dwellings in order to assess any traffic impacts and contribution will then be used for any necessary works arising. If no attributable impacts found within this period the developer's monies will be returned.

### **Foul & Surface Water Drainage**

Foul drainage from the development will be connected to the public sewer. The connection point will be to a manhole on "Lon Gamfa". When the application was submitted it is understood that this was a private sewer but in 2011 Welsh Water became responsible for all sewers serving two or more properties and since this time it has been a public sewer and for which they are the responsible statutory undertake. Welsh Water has confirmed that they have no objections to the foul drainage arrangements subject to the conditions recommended.

Surface water from the development will be discharged into an adjacent watercourse which leads to a private surface water sewer which outfalls directly into the Menai Straits. Objections have been received that this watercourse floods & that this development will exacerbate the issue. It is not considered that this will be the case as the surface water drainage system proposed in connection with the development flows will be limited to 3 litres a second. The system is also designed to store surface water from events beyond the 1 in 30 and up to the 1 in 100 year event in individual tanks below ground. These proposals are acceptable to the Environment Agency, Welsh Water and the council's Drainage Officer.

### **Nature Conservation**

The application is supported by an ecological assessment which has also been updated given the length of time that the planning application has been under consideration by the local planning authority.

The south-western boundary of the application site is located adjacent to the Caeau Pen y Clip Nature Reserve which is managed by North Wales Wildlife Trust who has made detailed observations.

Both the above material consideration have been considered by Natural Resources Wales and the council's Ecological Adviser and no objections are raised, conditions are recommended where appropriate below.

### **Design & External Appearance**

The development is located in a part of Menai Bridge which has been developed with modern relatively housing developments since the 1970's. In this context the character, appearance and density of the development will accord with that of the surroundings.

### **Residential Amenity**

Regard has been given in terms of overlooking and the effect on the outlook of adjacent residential properties at Lon y Gamfa and Gilfach Goch. The proposal is considered acceptable in this regard.

### **7. Conclusion**

Notwithstanding the fact that the application comprises a departure from the Ynys Mon Local Plan the principle of residential development is acceptable given the advanced stage reached in the preparation of the Stopped UDP. Detailed considerations notably highway and drainage considerations have been considered in the report above and are considered acceptable subject to the conditions listed below.

### **8. Recommendation**

To authorise the Head of Planning Service to **permit** the application subject to the completion of a legal agreement containing the following obligation:

6 Affordable housing units to be provided in connection with the development at 85% of the market value.

Thereafter that planning permission is issued subject to the following conditions:

**(01) The development hereby permitted shall be begun before the expiration of (five) years from the date of this permission.**

Reason: To comply with the requirements of Section 91(1) of the Town and Country Planning Act 1990.

**(02) The development hereby permitted shall be carried out in strict conformity with the details shown on the plans tabled below and contained in the form of application, and in any other documents accompanying such application.**

<b>Drawing No</b>	<b>Drawing Name</b>
1	Site Layout
3	Foul Drainage Layout
5	Floor Plans/Elevations
6	Foul Drainage Sections
8	Revised Chicane detail and driveways to Plots 1 and 2
9	Revised Layout/Levels Plots 1/2 and 5/6
10	Location Plan "A"
12	Surface Water Layout Plan
13	Surface Water

	Sections
14	Topographical Survey
15	Location Plan "B"

**Unless otherwise approved in writing by the local planning authority or included within any provision of the conditions of this planning permission.**

Reason To ensure that the development is implemented in accord with the approved details.

**(03) No development shall take place until trade descriptions of the materials proposed to be used on the external surfaces of the development have been submitted to and approved in writing by the Local Planning Authority. The approved materials shall be used in the implementation of the development.**

Reason: To ensure a satisfactory appearance to the development.

**(04) No development shall take place until a scheme of landscaping and tree planting for the site which provides for the retention of existing trees has been submitted to and approved in writing by the Local Planning Authority. The landscaping scheme shall show the proposed planting, including species, size and density and distinguish those trees to be retained showing their species, spread and maturity together with measures for their protection in the course of development. The approved new planting shall be implemented no later than the first planting season after the occupation of the buildings or completion of the development, whichever is the sooner. The approved protection measures shall be implemented prior to the commencement of development.**

Reason: In the interests of the amenities of the locality.

**(05) Any trees or shrub which forms part of the approved landscaping scheme which within a period of five years from planting fails to become established, becomes seriously damaged or diseased, dies or for any reason is removed shall be replaced in the next planting season by a tree or shrub of a species, size and maturity to be approved by the Local Planning Authority.**

Reason: In the interests of the amenities of the locality.

**(06) No development shall take place until details of the proposed slab levels of the building(s) in relation to the existing and proposed levels of the site and the surrounding land have been submitted to and approved in writing by the Local Planning Authority. The building(s) shall be constructed with the approved slab levels.**

Reason: For the avoidance of doubt and to ensure a satisfactory form of development.

**(07) No development shall take place until full details of a scheme indicating all of the proposed means of enclosure around and within the site whether by means of walls, fences or hedges has been submitted to and approved in writing by the Local Planning Authority. The approved means of enclosure shall be constructed, erected or planted prior to the occupation of the development.**

Reason To ensure that the details and appearance of the development are acceptable to the Local Planning Authority.

**(08) The details to be submitted for the approval in writing of the Local Planning Authority shall include a scheme of landscaping and tree planting for the site which provides for the retention of the existing trees. The landscaping scheme shall show the proposed planting including species, size and density and distinguish the trees to be retained showing their species spread and maturity together with measures for their protection in the course of development in accord with BS 5837:2005 Trees in Relation to Construction. The approved new planting shall be implemented not later than the first planting season after the occupation of the buildings or completion of the development, whichever is the sooner. The approved protection measures shall be implemented prior to the commencement of development.**

Reason: In the interests of the amenities of the locality.

**(09) Any trees or shrub which forms part of the approved landscaping scheme which within a period of five years from planting fails to become established, becomes seriously damaged or diseased, dies or for any reason is removed shall be replaced in the next planting season by a tree or shrub of a species, size and maturity to be approved by the Local Planning Authority.**

Reason: In the interests of the amenities of the locality.

**(10) Foul water and surface water discharges must be drained separately from the site.**

Reason: To protect the integrity of the public sewerage system.

**(11) No surface water shall be allowed to connect either directly or indirectly to the public sewerage system unless otherwise approved in writing by the local planning authority.**

Reason: To prevent hydraulic overloading of the public sewerage system, to protect the health and safety of existing residents and ensure no detriment to the environment.

**(12) Land drainage run-off shall not be permitted to discharge either directly or indirectly into the public sewerage system.**

Reason: To prevent hydraulic overload of the public sewerage system and pollution of the environment.

**(13) No development shall commence until the developer has prepared a scheme for the comprehensive and integrated drainage of the site showing how foul water, surface water and land drainage will be dealt with and this has been approved by the Local Planning Authority.**

Reason: To ensure the effective drainage facilities are provided for the proposed development, and that no adverse impact occurs to the environment or the existing public sewerage system.

**(14) Notwithstanding the drainage details submitted no development approved by this permission shall be commenced until the following drainage details have been submitted to and approved in writing by the local planning authority:**

**Full design and specification for all foul, surface water regulation system and land drains serving the development (including all parking areas and the estate road(s).**

**The surface water regulation system to be submitted under the provisions of this condition shall limit surface water run-off to 3 litres a second shall be designed to store surface water up to 1 in a 100 year event.**

**The details approved under the provisions of this condition shall be completed and fully operational prior to the occupation of the development hereby approved.**

Reason: To ensure that the development is adequately drained prevent the increased risk of flooding on and off the site.

**(15) Notwithstanding the plans hereby approved no development shall commence until detailed specifications and plans of the proposed priority system illustrated on drawing number (8B) and received (24/10/2013) shall be submitted to and approved in writing by the local planning authority. No dwelling on the development hereby approved shall be occupied until the priority system duly approved under this condition has been fully completed.**

Reason: To minimise danger and inconvenience to highway users.

**(16) The vehicle driveways shall be constructed with its gradient not exceeding 1 in 20 for the first 5 metres back from the nearside edge of the adjoining footway.**

Reason: To minimise danger and inconvenience to highway users.

**(17) The car parking accommodation shall be completed in full accordance with the details as submitted before the use hereby permitted is commenced and thereafter retained solely for those purposes.**

Reason: To enable vehicles to draw off, park and turn clear of the highway to minimise danger, obstruction and inconvenience to users of the adjoining highway.

**(18) All walls, hedges, fences (includes any means of enclosure) erected or planted within 2 meters of the estate road(s) hereby approved and /or the public highway shall not exceed 0.6 meters above the level of the road carriageway.**

Reason: To provide adequate inter-visibility between the access and the existing public highway for the safety and convenience of users of the highway and of the access.

**(19) The estate road(s) and accesses hereby approved shall be constructed in accord with the Isle of Anglesey Council "Technical Requirements for Estate Roads in Anglesey" (Date) or any expressly alternative document approved in writing by the local planning authority.**

Reason: In order to minimise danger, obstruction and inconvenience to users of the highway and of the access.

**(20) The estate road(s) hereby approved shall be completed to a base course finish and with the surface water drainage system complete and fully operational prior to the development of any of the dwellings hereby approved.**

Reason: In order to minimise danger, obstruction and inconvenience to users of the highway and of the access.

**(21) The estate road(s) hereby approved shall be kerbed and the carriageway and footways surfaced prior to the occupation of the last dwelling on the development hereby approved or within 2 years of the commencement of this development whichever is the sooner.**

Reason: In order to minimise danger, obstruction and inconvenience to users of the highway and of the access.

**(22) No development shall commence until measures are in place for the management and maintenance of the access and estate roads in accordance with details previously submitted to and approved in writing by the local planning authority. The access and estate roads shall be maintained according to the approved details for as long as the use hereby approved continues.**

Reason: In order to minimise danger, obstruction and inconvenience to users of the highway and of the access.

**(23) No development approved by this permission shall be commenced until: (a) The application site has been subjected to a detailed scheme for the investigation and recording of contamination and a report has been submitted to and approved by the local planning authority. (b) Detailed proposals in line with current best practice for the removal, containment or otherwise rendering harmless such contamination (the 'Contamination Proposals') have been submitted to and approved by the local planning authority. (c) For each part of the development contamination proposals relevant to that part (or any part that would be affected by the development) shall be carried out either before or during such development as appropriate. (d) If during development works any contamination should be encountered which was not previously identified and is derived from a different source and/or of a different type to those included in the 'Contamination Proposals' then revised 'Contamination Proposals' shall be submitted to the local planning authority. (e) If during development work site contaminants are found in areas previously expected to be clean, then their remediation shall be carried out in line with the agreed 'Contamination Proposals.'**

Reason To ensure that contamination present is satisfactorily remedied.

**(24) Notwithstanding the plans and supporting information submitted the development hereby approved shall commence until a scheme for the comprehensive and integrated drainage of the site demonstrating how foul water, surface water and land drainage will dealt with has been submitted to and approved in writing by the local planning authority. The details approved under the provisions of this condition shall be completed prior to the occupation of the development or any other date as may be approved in writing by the local planning authority. Surface water run-off generated by the development shall be limited to the 1 in 100 year critical storm (allowance for climate change)**

Reason To ensure that effective drainage facilities are provided for the proposed development and that no adverse impact occurs to the environment or adjacent properties and to ensure satisfactory storage of/disposal of surface water from the development.

### **Informatives**

Drainage memo 03.04.13

Welsh Water letter 12.12.12 & plans

Environmental Services memo 19.10.11, 23.11.12

Environment Agency letter 19.03.13

Highway memo 29.11.12

The applicant is advised to contact the council's Highways Section and agree the site compound location, traffic management scheme, any vehicle wheel washing facilities, hours and days of operation and the management and operation of construction vehicles, including staff and contractor parking facilities.

Any culverting of a watercourse requires the prior written approval of the Local Authority under the terms of the Public Health Act 1936, and the prior written consent from us under the terms of the Land Drainage Act 1991/Water Resources Act 1991. We seek to avoid culverting, and its consent for such works will not normally be granted except for access crossings.

## 7.3

### Gweddill y Ceisiadau

### Remainder Applications

Rhif y Cais: **46C147D** Application Number

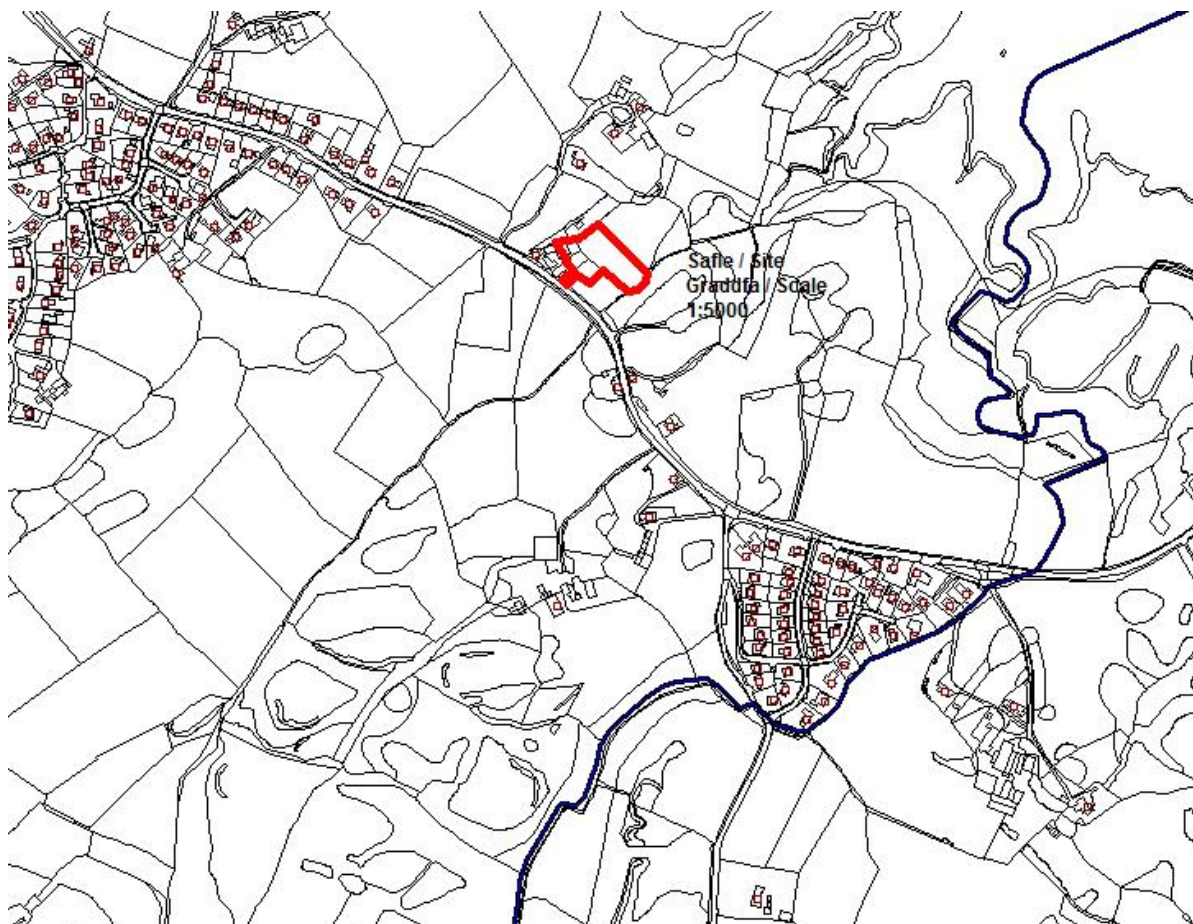
Ymgeisydd Applicant

**Mr & Mrs J Maguire  
c/o ERW Consulting  
Llys Elwen,  
Engedi,  
Bryngwran,  
Anglesey,  
LL65 3RR**

Cais ol-weithredol ar gyfer defnydd y padog fel safle carfanau teithiol a cadw dau gynhwysydd gyda defnydd fel bloc cawod a toiled, defnydd tir a cadw'r man caled ar gyfer storfa masnachol i carfanau, cychod a ol-gerbydau, defnydd preswyl o un garafan teithiol a cadw portacabin gyda defnydd swyddfa ynghyd a ail-osod tanc septig presennol gyda system trin carthffosiaeth newydd yn

Retrospective application for the use of paddock as a touring caravan site and retention of two containers used as toilet and shower block, the use of land and retention of hardstanding for the commercial storage of caravans, boats and trailers, the residential use of a single touring caravan and retention of portacabin used as an office together with the replacement of the existing septic tank with a new sewage treatment plant and soakaway at

Tan y Graig, Trearddur Bay



## **Planning Committee: 06/11/2013**

### **Report of Head of Planning Service (SWO)**

#### **Recommendation:**

**Permit** the retrospective application for the use of paddock as a touring caravan site and retention of two containers used as toilet and shower block, the use of land and retention of hardstanding for the commercial storage of caravans, boats and trailers, the retention of portacabin used as an office together with the replacement of the existing septic tank with a new sewage treatment plant and soakaway

**Refuse** the application for the use of a single touring caravan for residential purposes.

#### **Reason for Reporting to Committee:**

On request of the Local Member Cllr Dafydd Rhys Thomas.

At the meeting held on 2<sup>nd</sup> October 2013 members resolved to undertake a site visit prior to determining the application. The site visit took place on 16<sup>th</sup> October, 2013 and the members will be familiar with the site and its setting.

#### **1. Proposal and Site**

The application is a retrospective submission for the continued use of the paddock as a touring caravan site and retention of two containers used as toilet and shower block, the use of land and retention of hardstanding for the commercial storage of caravans, boats and trailers, the residential use of a single touring caravan and retention of a portacabin used as an office together with the replacement of the existing septic tank with a new sewage treatment plant and soakaway at Tan Y Graig, Trearddur Bay.

The site itself lies in an open countryside location outside the defined development boundary for the settlement of Trearddur Bay with access to the site being afforded directly off the B4545. Views of the site from the public highway are mitigated by virtue of the natural stone wall enclosures which lie along the boundary of the site and the residential properties and agricultural type building which lie between the application site and highway.

#### **2. Key Issue(s)**

The key issues to be considered in the determination of the application are whether the principle of development is acceptable, highway safety, the effect which the development might have upon the amenities of neighbouring properties and its impact upon the landscape which is designated as an Area of Outstanding Natural Beauty.

#### **3. Main Policies**

##### **Ynys Mon Local Plan**

Policy 1 General Policy  
Policy 12 New Touring Sites  
Policy 30 Landscape  
Policy 36 Coastal Development  
Policy 53 Housing in the Countryside  
Policy 57 Residential Caravans

##### **Gwynedd Structure Plan**

Policy A6 Housing  
Policy D1 AONB  
Policy D5 Coastal Sites  
Policy D9 Environmentally Sensitive Areas Policy Policy D29 Standard of Design and Setting  
Policy D32 Landscaping

##### **Stopped Unitary Development Plan**

Policy GP 1 Development Control Guidance  
Policy TO 6 Touring Caravans  
Policy EN 2 AONB



Policy SG 5 Private Sewage Treatment Facilities  
Policy HP 6 Dwellings in Open Countryside

## **Planning Policy Wales Edition 5 November 2012**

### **Technical Advice Notes**

TAN 9 Enforcement of Planning Control  
TAN 12 Design  
TAN 13 Tourism  
TAN 18 Transport

### **Supplementary Planning Guidance**

Holiday Accommodation- 2007

#### **4. Response to Consultation and Publicity**

**Cllr Dafydd Rhys Thomas-** requested that the application be referred to committee on the basis that local residents are concerned about vehicle access as several accidents have taken place near the new entrance. Also residents disappointed that all this work seems to have been completed without the correct planning permission.

**Cllr Jeffrey M Evans-** No response

**Cllr Trefor Lloyd Hughes-** No response

**Community Council-** Object- Totally against the use of the paddock. This application should be fully investigated. The development should not have been allowed to take place without going through the normal planning procedures. The road nearby has numerous accident marks, even a fatality. The Highways Department has already marked the kerbstones in black and white to mark this extremely dangerous bend which is not suitable for an access on the dangerous corner.

**Natural Resource Wales-** The caravan site appears to have capacity and a use pattern which suggests that 20 plus touring vans is possible. The need for a properly sized sewage treatment plant at the site remains as requested in previous correspondence. The discharge to water and proximity of designated site downstream retains the need for a permit. Disposal for chemical toilet waste should be considered and included in site plans.

**Economic Development-** Disappointed to note that the principal of planning permission has been disregarded due to the retrospective nature of the application. However, the Economic Development Unit supports the application subject to consideration of their listed criteria.

**Building Regulations-** Advised of the situation

**Drainage Section-** Drainage detailed in the proposal appears satisfactory.

**Highways Section-** No Objection to the application

**Environmental Services-** Comments with respect to Environmental Protection and Health and Safety considerations.

**R.S.P.B.-** No Response

**Gwynedd Archaeological Trust-** Awaiting formal comments

**Ecological and Environmental Adviser-** Not aware of any ecological issues associated with this case. Advise that NRW and the RSPB be consulted due to the proximity of the site to the Beddmanarch Site of Special Scientific Interest (SSSI).

**Dwr Cymru-** No response

#### **5. Relevant Planning History**

46C147- Alterations and extensions to Tan y Graig, Trearddur Bay. Approved 22/03/89

46C147A- Demolition of the existing outbuilding, the erection of a new boat storage building, alterations to the existing vehicular access together with an extension to the curtilage at Tan Y Graig, Trearddur Bay. Approved- 13/07/10

46C147B- Conversion of the outbuilding into a dwelling together with the installation of a septic tank at Tan Y Graig, Trearddur Bay. Refused 28/02/11

46C147C- Conversion of outbuilding into a dwelling together with the installation of a septic tank at Tan Y Graig, Trearddur Bay. Approved 25/04/12

The application was afforded publicity by way of site notices which were positioned within close proximity around the application site and, the distribution of personal letters of notification to neighbouring occupiers and an advert in the local press.

The latest date for the submission of representations is the 27<sup>th</sup> September, 2013 and at the time of writing the report several letters of objection had been presented to the department.

The members' attention is respectfully drawn to the fact that the letters of objection can be viewed in full on the application file. In summary however the objections were as follows.

-Lon St Ffraid has seen many road traffic accidents over the last decade. Granting permission to caravan tourers will significantly increase the risk of further road traffic accidents.

-The change of use is already in existence as the application is retrospective. In addition it is a significant change with increased traffic onto Lon St Ffraid, increased noise levels and a noticeable change in the aesthetics of the area sitting close to the Glannau Ynys Cybi SSSI

-Concern with respect to the fact that Building Control approval has not been sought. Potential consequences of the toilet/shower block upon the inland sea. Matter should be investigated by Planning, Building Control and Environment Officer

-The site is already developed and in use. Over the last two years the number of caravans and boats has increased dramatically and are visible from the highway. Given the past actions of the site owner with respect to disregarding imposed limits on numbers which were set by the Caravan Club restrictions on numbers should be considered if approval is given, notwithstanding the objections and concerns which were placed on record.

-It is considered that the owners have proceeded with works without permission and the principal of planning permission has been disregarded. If this scheme is approved, then it sets a precedence whereby others might carry out works and apply for permission retrospectively.

-The application should be fully considered by all relevant bodies as it has wider implications for all

-This development detracts unacceptably from the area with the large shed and rows of stored caravans. It gives the impression of a recycling yard.

-The attempts to screen the site from the highway are unsuccessful, especially when walking past the site.

-The touring area can also be seen from a large area of the inland sea

-The soft landscaping afforded the site is ineffective

Tourism should not be supported at the cost of spoiling the views which people come here to see.

-There are already plenty of touring sites in the area

-The application is for multiple uses, the various parts of which are subject to different rules, regulations and planning requirements and should therefore be several separate planning applications

-The County Council is committed to the provision of high quality tourist accommodation within its area. The present application is patently not high quality having to share its access through a commercial storage area and with several residential properties

- Stored caravans have regularly been observed to have strayed beyond the areas which have now been designated for such use
- Two containers used as a shower and toilet block does not create the image of high quality
- There are fire risks associated with the commercial storage element
- There is potential for the number of touring caravans to be doubled. The maximum number of pitches should be an essential requirement in making a planning decision.
- Council policy states that fast growing conifers should not be permitted
- There are Environmental and Ecological risks associated with this development given its proximity to a SSSI
- There is already one established caravan site overlooking the inland sea. To have a second would be unacceptable in such a visually sensitive area. Screening would also be impossible from the direction of the inland sea.
- Concern expressed with respect to the owners "housekeeping standards" given the fact that there is a derelict boat hull and cannibalized car on site.
- There is no formal Risk assessment on file nor an Environmental Impact Assessment
- There is no permit for the discharge of the sewerage treatment plant available on the application file.
- The applicants do not live on the premises. They live at Red Sails, Lon Isallt, Trearddur Bay.
- There is no adequate screening for noise or privacy for nearby residential occupiers and there is no adequate fencing of the touring site to prevent ingress to neighbouring properties
- It is advertised that on the Caravan Club web site as being open for twelve months of the year.
- It has been observed that caravans have been left on the touring site unoccupied for at least 28 days and in some cases considerably longer.
- The whole planning application seems rather strange, because the applicants have already carried out almost all of the work and actions contained in it. Surely planning consent should be obtained before any work is done. The sequence of events in this development means that the work has been carried out first; application for planning consent has been made after the event, effectively defying the planning system, thereby presenting a fait accompli and not allowing the Council to control or undo what has already been done. Also there has been no opportunity for other outside agencies to have any input before the work is done.

In response to these objections, I shall provide a response which addresses each of the objections, in the chronological order in which they have been listed.

- On the matter of road traffic accidents it can be confirmed that the Highways Section were consulted and their professional views sought on the application. Their response confirmed that they had no objection to the application. Furthermore, they confirmed that an analysis of the accident records for the last ten years would serve to demonstrate that there has been one slight accident for this area which was recorded on the 9/12/2008.
- The fact that the application is retrospective is duly acknowledged by the department. Indeed the submission itself has been brought about as a result of the local planning authority's repeated intervention by way of its Planning Enforcement function. All of the constituent parts which make up this application and the 'significance of change' brought about by each element will be given due consideration as part of the Authority's detailed assessment of matters.
- The retrospective nature of this submission may well have resulted in a form of development which has not sought and obtained the approval of other agencies/departments with an interest in the site. However, the intervention of the local planning authority has secured the submission of an application, albeit retrospective in nature, which has subsequently resulted in consultations being carried out with various

organisations/agencies referred to within the objections in order that they may be given an opportunity of commenting upon the application.

- The current application offers an opportunity of addressing and controlling what has hitherto been an unregulated and unauthorised use of the land. In effect it seeks to bring matters into check. Moreover, any approval which the local planning authority might be minded to grant for any element of that sought within the application description for the site would be subject to the usual tests laid out within Circular 35/95 'The Use of Conditions on Planning Permissions'. Any breach of the terms imposed by the Caravan Club as an exempted organisation however would, in the first instance, be a matter for investigation by the aforementioned organisation.

- Whilst such an action is to be discouraged, it is not however a criminal offence to carry out development without first obtaining the necessary planning permission. Furthermore, provision exists within the current Regulations which allow individuals to submit retrospective planning applications in an effort to regularise matters irrespective of 'precedence'.

- The current application has been subject to extensive modification and professional consultation procedures which acknowledge its 'wider implications for all'.

- The 'large shed' which is referred to within the objections and its 'impact upon the area' has previously received approval from the local planning authority. The matter of the stored caravans and its comparison with a recycling yard is an opinion which will be given greater consideration within the Main Planning Considerations section of the report.

- The natural stone boundary walls and timber gates which run along the sites frontage provide effective mitigation in terms of visual impact by virtue of the fact that the majority of that contained within the complex is obscured from view. A comprehensive soft landscaping scheme has been presented to the Authority in an effort to mitigate the impact of the development when viewed from the inland sea.

- A recommendation will be presented upon the proposal which bears due regard to both economic and environmental considerations.

- The fact that the area is well served by touring sites is not sufficient reason in itself to justify refusing the current application.

- The local planning authority is obliged to determine the application as it has been presented before it.

- The current application will be weighed in the balance and a recommendation will be presented which bears due regards to the policies of the currently extant development plans together with all other material planning considerations.

- The current application now affords an opportunity for developments on site to be brought into check.

- The comments with respect to ablution facilities are noted, Again however, a recommendation has to be made which is balanced and measured having given due regard to the full facts of the case.

- Any fire risks associated with the development are matters which the site operator should be conversant and fully compliant with. The Environmental Services consultation response will be attached to any notice of approval which may be forthcoming for this element of the application.

- The possibility that the application site might be doubled is a matter which would again require the approval of the local planning authority and it is a matter which would be considered at that time should it indeed arise. The local planning authority is currently obliged however to consider the application on the basis of that presented before it.

- The conifer hedging on site forms part of the existing soft landscaping along the perimeter of the site with the public highway. The applicants' latest proposals provide for its phased removal and replacement with more appropriate species over a three year time frame.

- The Environment and Ecological risks associated with this development have been matters subject to scrutiny both internally and with external organisations as it evident within the reports Consultation Section.

- The application cannot reasonable be refused on the basis that there is another touring caravan site in

close proximity to the inland sea. Each application ultimately has to be determined on its own individual merits.

- The concern expressed with respect to the owners 'housekeeping standards' are noted. However, the local planning authority would refrain from responding upon this allegation other than stating that such issues can arise irrespective of whether or not permission may or may not be granted for the site.

- The application did not require the submission of a full Environmental Impact Assessment. On the matter of a formal risk assessment it is unclear whether the reference to such matters which lie beyond the remit of the planning regime.

- Similarly, any permit which might be required for the discharge of the sewerage treatment plant is a matter which lies beyond the remit of the planning regime.

- The application presented will be considered on the basis of 'land use'. It is again unclear what relevance the site owners' address might have upon this process.

- It is not anticipated that any approval for the site, with the exception of that requested for a permanent residential caravan use, would be likely to impinge upon the amenities of any of the neighbouring properties to such an extent that it should warrant refusing.

- Any use made of the site in conjunction with the site owners membership of The Caravan Club would in the first instance be subject of the rules and regulations which are enforced by that organisation.

- The application currently before the Authority effectively provides an opportunity to bring previously unregulated matters into check.

- The sequence of events in this case, as pointed out in several letters of objection, is indeed contrary to that which is advocated within the Welsh Assembly Governments publications in the matter, in particular Technical Advice Note 9 – Enforcement of Planning Control. Be that as it may however, the same documents go on to state quite clearly that it is not a criminal offence to carry out development without first obtaining any necessary planning permission. The comments pertaining to the matter being a 'fait accompli' however on the basis that the works could not potentially be undone are not correct. Similarly, outside agencies may not have been previously aware of the activities on the site and therefore not in a position to offer comment in advance of any decision. However, the local planning authority's concerted efforts in this instance have eventually resulted in the receipt of a formal submission which has afforded all interested parties, professional consultees and the public alike, an opportunity of assessing and submitting representations upon the proposal which have been given detailed consideration as part of the local planning authority's detailed assessment of matters.

## **6. Main Planning Considerations**

### **Principle of Development**

On the matter of the single **touring caravan for residential purposes**, it can be confirmed that Planning Policy Wales together with the relevant policies attached to the currently extant development plans for the area are clear in that new house building in the open countryside should be strictly controlled. The fact that a single residential unit on a particular site would be unobtrusive is not in itself, irrespective of permanency, a good argument in favour of permission as such permission could be granted too often to the detriment of the countryside. It is acknowledged that the unit has been positioned so as to produce the minimum impact on the surrounding landscape. However, in my opinion, this would not entirely erase its harmful effects on the attractive landscape that surrounds the application site. The residential stamp of the project together with the domestic paraphernalia which would in all likelihood be introduced and become expected with such a use would only serve to erode the character of the AONB. Moreover, it is not considered that this impediment could be overcome through the proposed landscaping proposals which form part of the proposal or any other form of ameliorative treatment.

The remainder of the development consists of the **touring caravan use, the hard standing, office, toilet and shower block, commercial storage of caravans, boats and trailers and replacement sewage treatment plant and soak away.**

Policy 12 of the Ynys Mon Local Plan which relates to New Touring Sites allows the creation and/or the extension or additional pitches subject to criteria including that the development should not harm the

appearance of the area. Policy CH5 of the Gwynedd Structure Plan has a less stringent requirement that proposals should unobtrusively be assimilated into the landscape.

Given the transient feature of this element of the proposal within an existing tourist destination coupled with the comprehensive landscaping proposals which form part of the submission it is not considered that a refusal can be reasonably justified on the basis of its impact upon the AONB.

Similarly, the hard standing, storage use and office are also well screened such that their impact upon the AONB is limited to such a degree that a refusal on visual amenity grounds could not be warranted; particularly given the comprehensive landscaping proposals which were later submitted in support of the proposal. In addition, an assessment has to be made which bears due regard to the principles of economic as well as environmental sustainability and having given due consideration to the full facts of the case which include all of the representations received, together with all other material planning considerations, I do not consider the impact which this element of the proposal might have in terms of its effect upon residential amenity or the character of the landscape which is designated as an AONB to be so adverse in itself so as to make the proposal unacceptable.

### **Highways Safety**

Significant concerns have been expressed by members of the public with respect to highway safety issues relating to the site. These concerns have been conveyed to officers of the Highways Section who have since confirmed, following careful analysis and assessment that they do not wish to raise an objection to the application on highway safety grounds.

### **Impact upon an Area of Outstanding Natural Beauty.**

This application is located within an Area of Outstanding Natural Beauty (AONB). It is a statutory designation that recognises the importance in landscape quality and nature conservation terms.

The primary objective for an AONB designation is the conservation and enhancement of their natural beauty. Local authorities have a statutory duty to have regard to AONB purposes and development control decision affecting AONB's should in the first instance favour conservation of natural beauty.

The storage element of the proposal together with the portakabin utilised as an office are located within the built up confines of the application site. They are flanked by the original two storey dwelling which served the site together with an outbuilding recently converted to a residential use to the North and an agricultural type steel framed building clad in vertical timber panelling and plastic coated corrugated sheeting to the South. Views of the storage area are extremely limited when viewed from the public highway given the fact that it is screened by high boundary walls which are constructed of randomly coursed stonework which extend along the sites frontage. When viewed from the direction of the inland sea the storage area is again predominantly screened by the high boundary walls which have also been constructed of natural stone.

The ablution facilities which are intended to serve the touring caravan use have been positioned next to the agricultural type storage building. Views of these facilities from the public highway are extremely limited whilst any impact when viewed from the direction of the inland sea is mitigated by virtue of the fact that it is set against the backdrop of a building of significantly greater proportions which has previously received the approval of the local planning authority. Further attempts to mitigate and assimilate these facilities when viewed from the direction of the inland sea has been successfully achieved by the installation of timber screens which replicate those utilised in the construction of the agricultural type building which lies next to it.

With the exception of the residential caravan use which clearly falls foul of planning policies in the given location, the touring site would by its very nature be a transient feature which would not impose permanent, year round effects upon the local environment. Views of the paddock from the public highway would be extremely limited. However, Views from the direction of the inland sea itself are highly likely as there is no intervening vegetation between the inland sea and the paddock. However, in an effort to mitigate this impact landscaping details have been prepared in discussion with the Authority's Landscape and Biodiversity Officers. The submitted landscape works detail the operations necessary for the successful establishment of the soft landscaping integration of the development with particular regard to the overall landscape quality and for the amenity of adjacent properties, highway and receptors'.

On balance, subject to the imposition of suitable planning conditions requiring that landscaping works be carried out prior to any additional caravans being brought on site, (over that permission by virtue of the Caravan Club exemption) the proposal in terms of its impact upon the AONB can not only be assimilated into

the landscape but can also contribute towards enhancing the overall appearance of the site.

## 7. Conclusion

In this instance I have considered the substance of representations made by the public, the applicants and agent together with other statutory consultees alike and have balanced these against the advice contained within the relevant policy documents.

Paragraph 6 of Technical Advice Notice (Wales) 9 Enforcement of Planning Control states that... 'Enforcement action should be commensurate to the breach of planning control to which it relates;... The intention should be to remedy the effects of the breach of planning control, not to punish the persons carrying out the breach. Nor should enforcement action be taken simply to regularise development for which permission had not been sought but which is otherwise acceptable.'

The objections received to the proposal are material planning considerations of significance which have been addressed in detail within the representations segment of the report found in Section 4. A further assessment of certain issues raised by the objectors is also dealt with within the main planning considerations section of the report which is located within Section 6.

Although careful consideration has been given to the matters raised by the objectors it is considered that the objections received carry insufficient weight to warrant refusal of the application with the exception of the touring caravan for residential purposes; the recommendation for which shall be one of refusal.

## 8. Recommendation

To **permit** the retrospective application for the continued use of the paddock as a touring caravan site and retention of two containers use as toilet and shower block, the use of land and retention of hard standing for the commercial storage of caravans, boats and trailers, retention of portacabin for use as an office together with the replacement of the septic tank with a sewerage treatment plant and soak away subject to the following conditions:

**(01) No touring caravans permitted under this consent shall be located on the site until the landscaping works detailed on drawing reference 13.08.PP.01 (Soft Landscaping Proposals) and comprising part of the application have been finalised and presented to the local planning authority for its written approval, implementation and completion, with the exception of the leylandii replacement programme which shall be undertaken and completed over a period of three years from the date of this permission.**

Reason – To safeguard the visual amenities of the area which is designated as an Area of Outstanding Natural Beauty.

**(02) The touring caravans, which shall not exceed 20 in number shall only be located within the area identified as 'Touring Site' and edged in red on the plan attached to this permission.**

Reason – To define the extent of the permission and in the interests of the amenities of the locality.

**(03) The area edged in red on the plan attached to this permission shall only be used as a touring caravan site between the 1st March and 31st October in any year and all caravans shall be removed from the touring site before the 1st November in any year and shall not be placed on the touring site before 1st March in any year.**

Reason – To define the nature of the permission and in the interests of the amenities of the locality.

**(04) The commercial storage area shall be restricted to the storage of touring caravans, boats and trailers unless otherwise agreed in writing with the local planning authority.**

Reason – For the avoidance of doubt and to ensure a satisfactory form of development

**(05) Details of any proposed means of external lighting for the application site shall be submitted to and approved in writing by the local planning authority prior to its installation on site. Thereafter, any scheme as may be approved shall be implemented and retained in accordance with the agreed detail.**

Reason – In the interests of the amenity of the designated landscape.

**(06) The office accommodation hereby approved shall be restricted for use in conjunction with the adjoining touring caravans and commercial storage facility only as detailed on the submitted drawings and particulars included on the form of application and supporting documents.**

Reason - For the avoidance of doubt.

**(07) Any further alterations which may be required to be carried out to the office, toilet or shower block, and which would be likely to affect their external appearance, consequent upon their implementation of this permission, shall form the subject of an application which shall be submitted to and approved by the local planning authority before any work is commenced on such alterations.**

Reason – To ensure that the details and appearance of the development are acceptable to the local planning authority.

**(08) The development permitted by this consent shall be carried out strictly in accordance with the plan(s) and details submitted on the 26.3.13, 2.5.13, 8.8.13 under planning application reference 46C147D and the details which may require to be approved under the remaining conditions listed above.**

Reason – For the avoidance of doubt and to ensure a satisfactory form of development.

To **refuse** the residential use of a touring caravan subject to the following reasons:

(01) The local planning authority consider that the proposal would be tantamount to the erection of a new dwelling in the countryside for which no long term need is known to exist for the purpose of agriculture or forestry; the development would therefore be contrary to the approved Policy A6 of the Gwynedd Replacement Structure Plan which aims to control new development in the countryside, to policy 53 of the Ynys Mon Local Plan, Policy HP6 of the Stopped Unitary Development Plan and to the advice given in Planning Policy Wales (Edition 5, November 2012).

(02) The proposal would constitute isolated sporadic development in an open rural area unrelated to any village nucleus and as such would cause serious injury to the character and amenities to this area designated as being of Outstanding Natural Beauty.

(03) The proposal conflicts with Policy 57 of the Ynys Mon Local Plan and would set an undesirable precedent for similar proposals on the island.

(04) The local planning authority does not wish to encourage this type of sub-standard residential accommodation on the island.

## **9. Other Relevant Policies**

**Circular 35/95: The Use of Conditions on Planning Permissions**

**Supplementary Planning Guidance: Holiday Accommodation.**



Rhif y Cais: **46C427K/TR/EIA/ECON** Application Number

Ymgeisydd Applicant

**Land and Lakes (Anglesey) Ltd**  
**c/o HOW Planning LLP**  
**40 Peter Street**  
**Manchester**  
**M2 5GP**

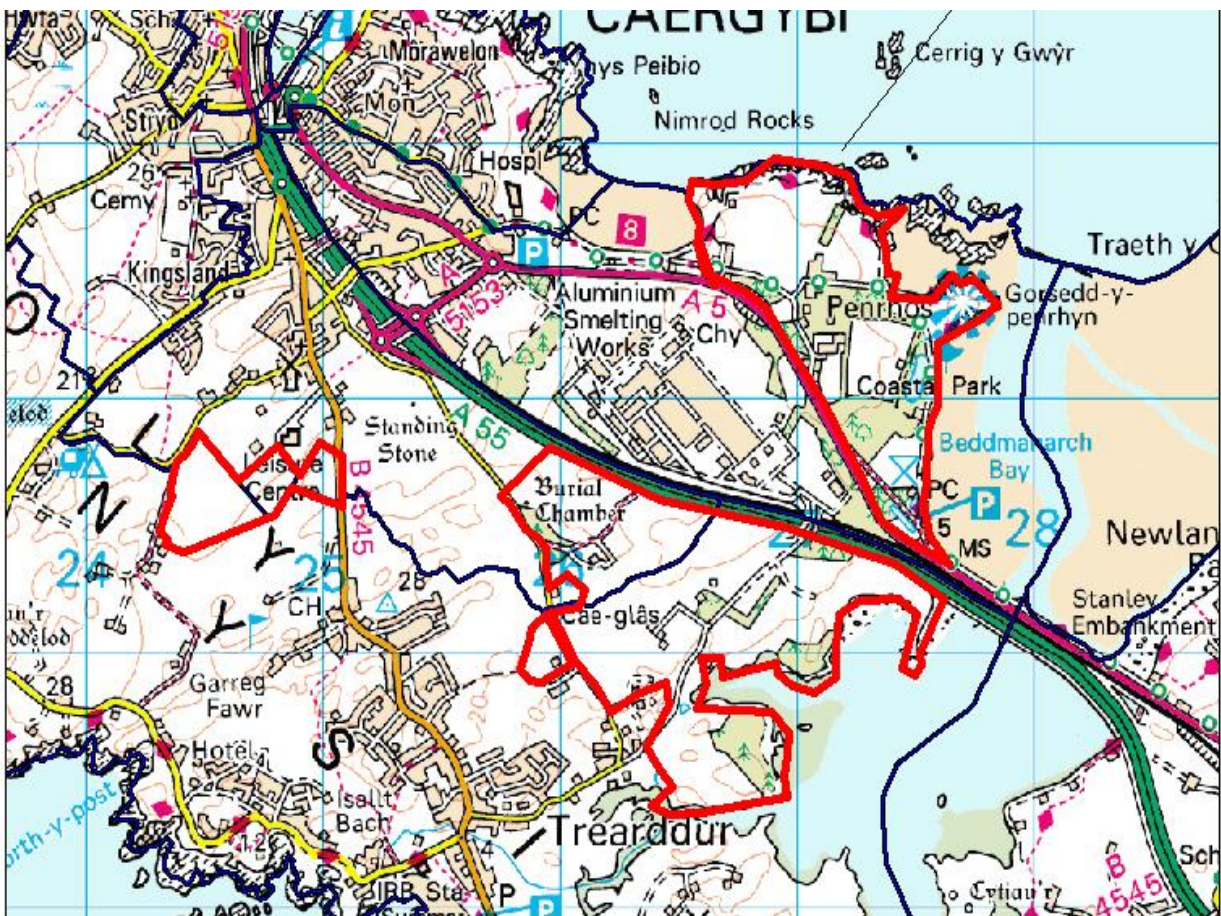
Cais cynllunio hybrid sy'n cynnig: Amlinellol gyda'r holl faterion wedi eu cadw'n ôl ac eithrio dull mynediad, ar gyfer : Pentref Hamdden ym Mharc Arfordirol Penrhos, Ffordd Llundain, Caerdybi yn cynnwys: Hyd at 500 o unedau hamdden newydd gan gynnwys porthdai a bythynnod newydd; Adeilad canolbwynt canolog newydd gan gynnwys derbynfa gyda chyfleusterau hamdden gan gynnwys parc dwr isdrofannol dan do, neuadd chwaraeon dan do, caffis, bariau, bwytai ac adwerthu; Adeilad canolog newydd ar gyfer Marchnad Ffermwr; Adeilad hamdden a sba canolog newydd; Canolfan chwaraeon dwr a chaffi newydd ar safle'r hen Dy Cwch; Dymchwel y Baddondy ac adeiladu bwyty ar ei safle; Dymchwel adeiladau eraill gan gynnwys tair ysgubor amaethyddol a thair annedd; Darparu a chynnal 29 hectar o ardaloedd cyhoeddus gyda maes parcio i'r cyhoedd a gwelliannau i'r llwybr arfordirol gan gynnwys: Rhodfeydd a reolir o fewn 15 hectar i goetir, cadw a gwella Pwll Grace, Pwll Lili, Pwll Sgowtiaid gyda llwyfannau gweld, y Fynwent Anifeiliaid Anwes, y Gofeb, y Ty Pwmp a maes picnic gyda gorsafodded bwydo adar a chuddfannau gwylio adar, gydag arwyddion dehongli addysgiadol a dwyieithog trwy'r cyfan; Creu trywydd cerfluniau newydd trwy goetir a llwybrau pren a gwell cysylltiad gyda Llwybr yr Arfordir; Bydd y traeth yn parhau i fod yn hygyrch i'r cyhoedd gan ddarparu mynediad diogel i'r dwr bas; Canolfan Bwer a Gwres gyfun. Tir yn Cae Glas - Codi llety a chyfleusterau pentref hamdden sydd wedi eu dylunio i'w defnyddio yn y lle cyntaf fel llety dros dro i weithwyr adeiladu ar gyfer Wylfa B ar dir Cae Glas, Parc Cybi, Caerdybi yn cynnwys: Hyd at 315 o borthdai i'w hisrannu yn y lle cyntaf fel llety ar gyfer gweithwyr niwclear; Adeilad canolbwynt canolog gan gynnwys derbynfa a chantîn ar gyfer y llety; Cyfleuster Parcio a Theithio gyda hyd at 700 o lecynnau parcio ceir; Gwesty newydd; Adeilad canolbwynt wrth ochr llyn yn cynnwys bwyty, caffi, adwerthu a bar; Cae pêl-droed glaswellt newydd a chae criced; a Canolfan Bwer a Gwres Gyfun. I'w haddasu wedyn (ar ôl adeiladu Wylfa B) i fod yn estyniad i Bentref Hamdden Parc Arfordirol Penrhos gan gynnwys: Porthdai ac adeiladau cyfleusterau wedi eu hadnewyddu i greu llety gwyliau o safon uchel (hyd at 315 o borthdai i

A hybrid planning application proposing: Outline with all matters reserved except for means of access, for: A leisure village at Penrhos Coastal Park, London Road, Holyhead comprising: up to 500 new leisure units including new lodges and cottages; Central new hub building comprising reception with leisure facilities including indoor sub-tropical water park, indoor sports hall, and cafes, bars, restaurants and retail; Central new Farmer's Market building; Central new spa and leisure building; A new café and watersports centre at the site of the former Boathouse; Demolition of the Bathing House and the construction of a restaurant at its former location; Demolition of other existing buildings including three agricultural barns and three residential dwellings; Providing and maintaining 29 hectares of publicly accessible areas with public car parking and enhancements to the Coastal Path, including: Managed walkways within 15 hectares of woodland, the retention and enhancement of Grace's pond, Lily Pond, Scout's pond with viewing platforms, the Pet Cemetery, War Memorial, the Pump House and picnic area with bird feeding stations and hides with educational and bilingual interpretation signage created throughout; Creation of a new woodland sculpture trail and boardwalks and enhanced connection to the Coastal Path; The beach will continue to be accessible to the public providing safe access to the shallow shelving water; A Combined Heat and Power Centre Land at Cae Glas: The erection of leisure village accommodation and facilities which have been designed to be used initially as a temporary construction workers accommodation complex for Wylfa B at land at Cae Glas, Parc Cybi, Holyhead comprising: Up to 315 lodges which will be initially sub divided for nuclear workers accommodation; Central hub building providing reception and canteen ancillary to accommodation; A Park and Ride facility comprising up to 700 car parking spaces; A new hotel; A lakeside hub comprising restaurant, café, retail and bar; New grass football pitch and cricket pitch; and a Combined Heat and Power Centre. To be subsequently converted (post Wylfa B construction) into an extension to the Penrhos Coastal Park Leisure Village comprising: Refurbished lodges and facility buildings to create high quality holiday accommodation (up to 315 family lodges); A Visitor Centre and Nature Reserve allowing controlled

deuluoedd); Canolfan Ymwelwyr a Gwarchodfa Natur sy'n caniatáu mynediad i'r cyhoedd dan reolaeth; a Canolfan Dreftadaeth gyda lle parcio i ymwelwyr. Tir yn Kingsland - Codi datblygiad preswyl a ddyluniwyd i'w ddefnyddio yn y lle cyntaf fel llety i weithwyr adeiladu yn Kingsland, Ffordd Kingsland, Caergybi yn cynnwys: Hyd at 360 o dai newydd i'w defnyddio yn y lle cyntaf fel llety dros dro i weithwyr adeiladu. I'w haddasu wedyn (ar ôl adeiladu Wylfa B) i fod yn ddatblygiad preswyl a fyddai'n cynnwys: Hyd at 360 o anheddau mewn tirwedd o safon uchel a llecynnau agored. Bydd datblygiadau atodol ar gyfer pob cam o'r gwaith datblygu, gan gynnwys darpariaethau ar gyfer parcio, ardaloedd gwasanaeth, llecynnau agored a pheiriannau/gwaith. Manylion llawn ar gyfer newid defnydd yr adeiladau Stad cyfredol ym Mharc Arfordirol Penrhos, Ffordd Llundain, Caergybi gan gynnwys newid defnydd: Twr y Beili ac adeiladau allanol yn Fferm Penrhos o dy clwb criced i fod yn ganolfan wybodaeth i ymwelwyr, bwyty, caffi, bariâu ac adwerthu; Ysgubor y Fferm ac Adeiladau Trol o fod yn adeiladau fferm i fod yn ganolfan ar gyfer hurio beiciau ac offer chwaraeon; Y Twr o ddefnydd preswyl i fod yn llety i reolwyr a swyddfa atodol; a Ty Beddmanarch o anedd i fod yn ganolfan i ymwelwyr

public access; and Heritage Centre with visitor parking. Land at Kingsland: The erection of a residential development which has been designed to be used initially as temporary construction workers accommodation at land at Kingsland, Kingsland Road, Holyhead comprising: Up to 360 new houses to be initially used as temporary construction workers accommodation. To be subsequently converted (post Wylfa B construction) into a residential development comprising: Up to 360 residential dwellings set in high quality landscaping and open spaces. Each phase of development will have ancillary development comprising car parking, servicing areas, open spaces and plant. Full detail for the change of use of the existing Estate buildings at Penrhos Coastal Park, London Road, Holyhead including the change of use for: The Bailiffs Tower and outbuildings at Penrhos Home Farm from a cricket clubhouse to a visitors information centre, restaurant, café, bars and retail; Home Farm Barn and Cart Buildings from farm buildings to cycle and sports hire centre; The Tower from residential to a Managers accommodation and ancillary office; and Beddmanarch House from residential to a visitors centre.

Parc Arfordirol Penrhos \ Penrhos Coastal Park, Cae Glas a Kingsland, Caergybi \ Holyhead



## **Planning Committee: 06/11/2013**

### **Report of Head of Planning Service (DPJ)**

#### **Recommendation:**

Permit

#### **Reason for Reporting to Committee:**

On 2<sup>nd</sup> October 2013, Members resolved to refuse the application contrary to Officer recommendation. In accordance with paragraph 4.6.12 of the Constitution, the application is being again presented to Members so they can consider their resolution.

In this regard the report to the 2<sup>nd</sup> October Committee is attached at Appendix 1 (the Original Report). This fully explains the application and the relevant policies and considerations in relation to the application.

Appendix 2 contains an update of the information and representations raised since the application was presented to Committee on 2<sup>nd</sup> October. Issues of particular note, in so far as they relate to the particular grounds of refusal, are highlighted below.

Appendices 3, 4 & 5 contain representations from the Applicant received since the 2<sup>nd</sup> October Committee and which the Applicant has asked us to circulate. In particular page 4 of the letter from HOW Planning dated 24<sup>th</sup> October lists a range of benefits which the Applicant has requested are summarised.

#### **1. The Application**

Full details of the application are contained in the Original Report. However, it is not a straightforward application and it is worth summarising the components here.

It is a single application for three sites: Penrhos, Cae Glas and Kingsland. The Penrhos site is proposed as a leisure village with up to 500 lodges and cottages and associated facilities. The business case requires a coastal location to create a leisure destination which can compete with other inland leisure destinations in the UK. Cae Glas would provide an extension to the Penrhos leisure facility providing up to 315 lodges (and will depend upon Penrhos for its facilities and coastal access). Cae Glas will provide the replacement open space, replacement sports facilities and ecological provision. Kingsland will now provide up to 320 residential dwellings as opposed to the original figure of 360. However, permission is being sought for both Cae Glas and Kingsland to first be used for accommodating construction workers in association with the proposed new nuclear development at Wylfa. In this respect, Cae Glas will provide the hub (i.e. the central facilities for both Cae Glas and Kingsland). It is key to note that if Cae Glas and Kingsland are not first used for construction worker accommodation, they will not be developed at all. It is on the above basis that the sites are linked and are to be considered as one proposal.

#### **2. Members Reasons for Refusal**

At the 2<sup>nd</sup> October Committee, Members gave two reasons for refusal:

- (a) The proposals would constitute overdevelopment in the countryside;
- (b) The proposals would adversely impact the Area of Outstanding Natural Beauty.

The Officer's response to those reasons for refusal is dealt with in section 3.

#### **3. Officers Response to the Reasons for Refusal**

In order to respond to the reasons for refusal it is necessary to examine the reasons given, look at the evidence available to substantiate each reason and consider the reasons in the context of the development plan and other material considerations.

Members should have regard to the additional information contained within the Appendices.

## **Reason 1: Overdevelopment in the countryside**

It is unclear whether this reason is designed to cover scale of the development, or aspects of it, or is simply a refusal on the basis that the proposals involve building in the countryside and therefore the application is objectionable.

Either would be a genuine reason for refusal in the planning decision making context, however, they need to be viewed in the light of the development plan and material considerations.

As outlined in the Original Report, a significant part of the land the subject to the three sites lies within countryside in planning policy terms (i.e. it is outside of the settlement boundary of the statutory development plans- the adopted Ynys Mon Local Plan and the Gwynedd Structure Plan). That, however, does not apply to all the land. A substantial part of the Cae Glas site is allocated in the Local Plan for employment purposes and part of Kingsland is allocated for recreation and community facilities. As such, development would, in statutory development plan terms, be acceptable on those parts of the sites. What is proposed is intended as a high class, exemplar development with high levels of mitigation in landscaping terms. Whereas, in relation to Cae Glas in particular, given the development plan allocation, a different form of development could legitimately be put forward, such as an industrial development, which would likely to result in larger, more prominent buildings in the landscape and which is unlikely to deliver the range and depth of mitigation offered here.

As explained on page 67 of the Original Report, it is the Officer's view that more weight should be attached to the Stopped UDP (the weight to be given to plans is dealt with in policy and the Officer's approach is in accordance with this). In this regard, the Penrhos site would be considered to be edge of settlement, the Cae Glas site falls partly within the settlement as an employment allocation and partly adjoining Holyhead settlement and Kingsland, similarly, contains substantially land falling within the settlement as allocated for leisure uses and partly adjoining the settlement. It is important that Members take this planning policy position into account.

In relation to scale, Officers do not consider the proposal to represent overdevelopment. The extent and size of the units of accommodation (both leisure and residential) are controlled through the use of parameter plans accompanying the application which will need to be adhered to in submitting reserved matters applications and carrying out any development. A number of issues were raised by Natural Resource Wales and the Applicant has addressed those issues, such as a reduction in the heights of some of the buildings.

The Applicant maintains that the proposals do not exceed the technical or environmental capacity for the site (with none of the technical consultees raising any objection). The Applicant has undertaken an exercise to identify the extent of the new buildings, roads and pathways which would be created if planning permission were granted and have concluded that the total surfaced area is 17% (ie 83% of the sites will be enhanced through active, long term management and stewardship). The Applicant therefore contends that there is no evidence that the site would be overdeveloped.

"Notwithstanding the above, in an effort to allay Members' concerns, the Applicant is proposing an amendment to the application which will reduce its scale (see Appendix 5). This will result in less development at Kingsland and it will reduce the impact on the countryside as the proposed areas to be omitted from the application are, save for the area required for access, those which fall outside of the settlement allocation."

Having regard to the planning policy position and relationship of the sites to the development boundary, the Officer does not consider that the scale of the development is such that it would result in overdevelopment in the countryside.

## **Reason 2: Adverse impact on the AONB**

This, again, is a genuine planning reason for refusal. However, the approach to development in an AONB needs to be approached properly. There is a statutory requirement for such areas to be conserved and enhanced. It is also national policy that major developments should not take place except in exceptional circumstances. What amounts to exceptional circumstances is outlined in paragraph 5.5.6 of PPW (and is considered in detail in the Original Report). Essentially, this requires an examination of (i) the need for the development, in terms of national considerations, and the impact of permitting or refusing it on the local economy; (ii) the cost of and scope for providing the development outside the designated area or meeting the need for it in some other way; and (iii) assessing any detrimental effect on the environment and the landscape, and the extent to which that could be moderated. It is the third limb of this test that appears to

relate directly to the reason for refusal.

There are two very relevant considerations here. The first are the views of the professional officers and the statutory consultees. The second is what benefits the proposal brings in terms of the AONB and what mitigation is offered to mitigate/moderate any adverse impact.

So far as consultees are concerned, NRW, as acknowledged in the Original Report, raised concerns on the overall impact of the proposals. However, it will be seen from the consultation section of the Original Report, NRW have recommended a number of measures to minimise impact (including design changes and woodland and planting management) and the scheme reflects those requirements. NRW has withdrawn its objection. Given NRW's position (i.e. that it does not consider that there is sufficient impact on the AONB to recommend withholding permission), Officers' consider it would be difficult for Members' to take the opposite position without highlighting specifically what impacts they are concerned about and the evidence for these.

It will be noted that the Council's Landscape Officer, again whilst identifying that there will be impacts, has evaluated the Landscape and Visual Impact Assessment accompanying the application which recognises that the immediate impact will be adverse whilst planting and mitigation measures are carried out and they mature. However, impacts will then reduce.

The mitigation offered and the benefits the scheme brings in relation to the AONB are considered highly material. One of these is public access to Penrhos Coastal Park and Coastal footpath. At the moment public access is permissive (and maintenance costs are approximately £250,000 per annum of which the applicant contributes £100,000 per annum). With the withdrawal of the landowner, Anglesey Aluminium Metals, from the area, public access and ongoing maintenance is under threat. The proposals ensure the future access and maintenance of the AONB, which would be made the subject of a legally binding agreement with the Local Planning Authority as part of any permission granted. Specifically, public access will be made available free of charge to the Penrhos Coastal Park which is proposed to comprise (see Applicant's Q&A document at Appendix [4]) 7kms of walks, 73 acres of public amenity (including 37 acres of woodland), a new visitor centre at Beddymynach House, car park and toilets. There will also be a new 100 acre nature Reserve at Cae Glas. There will be compensatory habitat and species enhancement areas and measures, monitoring and future management and provision of appropriate funds in this respect. There will be a conservation management plan and the Applicant has agreed to establish a conservation management board for considering and implementing this plan.

It is the Officer's view, with the extensive mitigation offered in relation to the AONB, that any detrimental effect on the AONB will be suitably mitigated and that the Applicant has therefore satisfied the national policy requirements in this regard.

### **Consideration of the two reasons for refusal in the context of the development plan and other material considerations.**

The above examines the reasons for refusal individually and the evidence available which relates to those reasons. However, it is important to examine the reasons for refusal in the context of relevant development plan policies and other material considerations as a whole, on the basis that this is the approach which would be taken on appeal and, without such analysis, it is very difficult to give a view as to how the reasons for refusal might be viewed.

The Original Report undertakes this exercise and Members' attention is, in particular, drawn to pages 90 to 92 of the Original Report which provides a summary and conclusion of the relevant considerations. It is the Officer's view that two of the most significant considerations in this context are need and the economic benefits.

It is considered that there is a national need case in relation to tourism development (as evidenced by the Tourism Partnership North Wales which considers the project to be of national significance in terms of tourism development and promotion as well as the Destination Anglesey Partnership (DAP) Board which was formed by the Authority in response to and as a requirement of the Destination Management Plan 2012-2016 strategy. The importance of Land and Lakes is explicit in the adopted strategy. As such Land and Lakes is the only specifically named private sector investment relative to objectives 2 and 3. For example: Section 2.1.5 Support the development of a new holiday village. "... would help raise the profile of the Island and transform the accommodation stock in quantitative and qualitative terms; it would be a 'game-changer'. There is also considered to be a national need for the nuclear workers accommodation (as outlined in national policy). These are significant considerations in relation to allowing major developments to proceed in an AONB- see test (i) above. It is considered that this need should weigh very heavily in favour of granting

permission and, on any appeal, would be highly likely to outweigh the putative reasons for refusal. In fact the only element where an immediate need is not demonstrated is the legacy use of Kingsland as housing, but that use will not take place unless the site is first used for nuclear workers accommodation and it is accepted by officers that some legacy development, making use of the nuclear workers accommodation, is needed. Turning the existing buildings on the site to housing (with 50% of that as affordable) is considered acceptable in the context of a legacy use of the site.

The economic benefits are also considered to be of significance (and are relevant to the AONB tests in 5.5.6 PPW above) and Officers consider should be given considerable weight. PPW was revised in October 2012 with the aim of trying to ensure that the planning system in Wales facilitates economic renewal more effectively. Economic development considerations are dealt with on pages 79 and 80 of the report. Essentially, the estimated full time equivalent (FTE) jobs which will be created by the proposals amount to:

- 420 FTE jobs per year in the construction sector;
- 465 FTE operational jobs (rising to 615 FTE once multiplier effects are considered, that is to say indirect employment).

Therefore significant employment is envisaged for both the construction and operational phases of the development.

The kind of jobs which are envisaged to be available and how they relate to demand for employment in Anglesey is outlined in the Applicant's Q&A document (Appendix 4)

It is acknowledged by Officers that the proposals represent a 'step change' in the economy of Anglesey. Section 106 obligations are also relevant here. It will be noted that the Applicant has offered to enter into binding commitments in relation to local employment and training and working with local businesses. It will also fund apprentices during construction and operation of the development. Welsh language measures will be put in place in this regard to ensure the promotion and protection of the language is secured and legal obligations are also to be secured to ensure that suitable collaboration takes place with the existing tourism industry and local businesses to promote and protect those businesses from the impacts of the development to integrate the development appropriately.

Members' attention is also drawn to the proposed conditions and section 106 obligations. These are outlined in detail on pages 92 to 101 of the Original Report. In respect of the obligations, there are thirty-two different heads which have been agreed with the Applicant. They are wide ranging and provide significant benefits and mitigation measures.

It is therefore the Officer's view that, taken on their own and in the context of the development plan and other material considerations, the reasons for refusal, although genuine, are unlikely to be sufficient to prevent permission being granted on appeal.

#### **4. Appeal and Costs Issues**

If Members decide to maintain their refusal, the Appellants have a right to appeal to Welsh Government. This brings into consideration the issue of costs. Paragraph 4.6.12.1 of the Constitution states that, where deciding the matter contrary to the recommendation may risk costs on appeal, the Committee will take a recorded vote.

There is always a risk of costs on appeal when a refusal is made and it is fair to say that this remains a very real risk when the refusal is against Officers advice. In this regard, the costs circular (Circular 23/93) notes that a local planning authority runs the risk of a cost award against it where it has unreasonably refused planning permission. The circular advises that *"a planning authority should not prevent, inhibit or delay development which could reasonably be permitted, in the light of the development plan, so far as it is material to the application, and any other material considerations."* It further advises that *"reasons for refusal should be complete, precise, specific and relevant to the application. In any appeal proceedings, the authority will be expected to produce evidence to substantiate each reason for refusal, by reference to the development plan and all other material considerations. If they cannot do so, costs may be awarded against a planning authority. Each reason for refusal will be examined for evidence that the provisions of the development plan, and relevant advice... were properly taken into account... In any such proceedings, authorities will be expected to produce evidence to show clearly why the development cannot be permitted."*

In so far as a refusal against Officers recommendation is concerned, the advice states *"planning authorities*

*are not bound to adopt, or include as part of their case, the professional or technical advice given by their own Officers, or received from statutory bodies or consultees. But they will be expected to show that they had reasonable planning grounds for taking a decision contrary to such advice; and they were able to produce relevant evidence to support their decision in all respects. If they fail to do so, costs may be awarded against the authority.*" In particular, the circular states that planning authorities are expected thoroughly to consider relevant advice from a statutory consultee before determining a planning application.

Planning authorities are expected to consider the impact of development on existing buildings and the landscape and townscape and particular weight should be given to the impact of development on environmentally sensitive areas (such as Area of Outstanding Natural Beauty).

Planning authorities will be expected to show they have considered the possibility of imposing relevant planning conditions which would allow the development to proceed and they have considered any conditions proposed to them before refusing permission. Where an applicant offers to enter into a planning obligation which is relevant to his application, this will be a material consideration which the authority should take into account. In this regard, Regulation 122 of the Community Infrastructure Levy Regulations is relevant (see below).

Given the Original Report by Officers and the recommendation to grant permission, the response to the reasons for refusal, the fact that the Officers believe that the development, with the imposition of conditions and the section 106 obligations, is acceptable and should be granted permission, and the advice in circular 23/93, there is a risk of costs being awarded in connection with any appeal against a refusal on the above grounds and therefore it is considered that, if Members remain of the view that permission should be refused, a recorded vote should be taken.

## **5. Implications of the Decision**

If Members decide to refuse permission notwithstanding the response by Officers outlined in this report, the applicants may decide to appeal the refusal to the Planning Inspectorate. In this regard the issues raised in Section 4 regarding appeal costs will be relevant.

There are also potential implications for the section 106 obligations which are outlined in the Original Report. It is a requirement that such obligations are necessary to make the development acceptable in planning terms, directly related to the development and reasonably related in scale and kind to the development (Regulation 122, Community Infrastructure Regulations). Although Officers consider that the obligations meet the required tests, there is a very real possibility that on any appeal the Planning Inspectorate/Welsh Government could take a different view and that a number of the obligations contained in the resolution might be lost.

It should be noted that Welsh Government may decide to call in the application at any time before a decision is issued. It can do this if it considers that it raises issues of more than local importance. If Members decide to grant planning permission subject to the conditions and section 106 obligations outlined, notification of such a resolution will be made to Welsh Government and a 21 day period given before any permission can be issued. If Welsh Government considers it appropriate to call-in the application, then this will give it an opportunity to do so, effectively recovering jurisdiction of the application from the Council.

## **6. Recommendation**

On the basis of the Original Report to Committee of 2<sup>nd</sup> October and this Report, Members are requested to reconsider their resolution to refuse the application and are requested to grant planning permission for the development the subject of the Application in accordance with the recommendation contained in Section 9 of the Original Report. Namely:

That the application is referred to the Welsh Government for a period of 21 days in accordance with The Town and Country Planning (Notification) (Wales) Direction 2012 with a recommendation that the local planning authority are minded to permit the planning application subject to:

- (a) the applicant entering into a section 106 Agreement the draft heads of terms of which are set out in the Original Report; and
- (b) planning conditions covering the matters set out in the Original Report;

That the Head of Planning Services be granted delegated authority to negotiate the terms of the section 106

Agreement and deal with the matters in a) and b) above by condition or section 106 as is considered appropriate by the Head of Planning Services.

Background Papers:

1. Report to committee of 2 October 2013 (Appendix 1);
2. Update of Committee Report (Appendix 2);
3. Update papers

Correspondence dated 22<sup>nd</sup> October, 2013 from HOW Planning on behalf of Land and Lakes (Appendix 3)

Correspondence dated 24<sup>th</sup> October, 2013 from HOW Planning on behalf of Land and Lakes (Appendix 4)

Correspondence dated 30<sup>th</sup> October, 2013 from HOW Planning on behalf of Land and Lakes (Appendix 5)



## **Appendix 1**

**Planning Committee: 02/10/2013**

**Report of Head of Planning Service (DPJ)**

### **Recommendation:**

Permit.

### **Reason for Reporting to Committee:**

The application is a major planning application which is a departure from the development plan and it is accompanied by an Environmental Statement.

#### **1. The site and surroundings**

The planning application encompasses three separate sites at Kingsland, Cae Glas & Penrhos which the local planning authority are being requested to determine collectively due to the linkages between proposals for the three sites which are described in the next section of this report. The three sites are illustrated on the Location Plan enclosed as Appendix 1 and amount to a total area of 207.5 ha (511 acres), comprising land within the ownership of Anglesey Aluminium.

All three sites are located within the Area of Outstanding Natural Beauty (AONB). The Kingsland and Cae Glas sites are located within the Ynys Gybi electoral ward, and the Penrhos site within the Caergybi electoral ward.

#### **Penrhos**

The Penrhos site amounts to an area of 80 ha (197 acres) which Anglesey Aluminium allows to be used as a coastal park and maintains. It has a coastal location and comprises a predominantly afforested area; some of the trees on the site are subject to Tree Preservation Orders. To the north there is a cricket pitch and agricultural land along the headland. To the south there is a car park and toilet where Anglesey Aluminium open the gates open at 07.00am and close at 09.00pm. There are a number of footpaths leading through the site. A coastal path runs along coastline which benefits from a permissive right to use from the applicants. A formal public right of way and a cycle route runs from the car park through the trees along the route of the old A5 to the public highway to the north west. A new cycle route has also been constructed along the western boundary with the A5 highway.

The Penrhos site contains a number of listed buildings. It also contains duck ponds and a pet cemetery. In addition there are a number of residential properties on the site which are owned by the applicants. There is a football pitch located centrally on the site.

To the east the coastline adjoins the Beddmanarch-Cymyran Site of Special Scientific Interest. There are a number of residential properties within the site which are owned by the applicant.

#### **Cae Glas**

Cae Glas comprises a mixture of afforested and, agricultural land which is currently inaccessible to the public, extending down from the Park Cybi, Holyhead to the Inland sea amounting to an area of 109 ha (269 acres). The inland sea forms part of the Beddmanarch-Cymyran Site of Special Scientific Interest. To the north the Cae Glas site is bounded by the A55 Expressway and thereafter the main coast railway line from Holyhead and the Anglesey Aluminium and Aluminium Powder Company Sites "Alpoco". A private vehicular access from the A5 past "Alpoco" which leads over the railway and expressway dissects the site leading to Lon Towyn Capel which leads to the adjacent settlement at Treaddur Bay. There are a number of residential properties within the application site which are within the ownership of the applicant. To the south east of this private road there is a former landfill site which was used to deposit waste materials in connection with the former aluminium production and smelting processes at Anglesey Aluminium. Lon Trefignath runs through and along the western boundary of the application site to a roundabout forming part of the Parc Cybi development. The north east corner of the site contains the Trefignath Burial chamber which is a scheduled ancient monument (SAM).

## **Kingsland**

The Kingsland site comprises agricultural land to the south of the Holyhead between Treaddur Bay, amounting to a total area of 18.5 ha (45 acres). It adjoins the Holyhead Leisure Centre/Sports Stadium and is bounded by Mill Road along part of its northern boundary. To the east the Kingsland site is abutted by B4545 public highway and to the south by Holyhead Golf Club. The western part of the Kingsland site is intersected by a Public Right of Way number 2 leading to Lon Isallt which also serves as a vehicular access for a number of residential properties.

## **2. The Proposal**

The planning application was originally received on 28.11.12 as an outline planning application accompanied by an Environmental Statement with all matters reserved except the means of access. Following the receipt of consultation and notification responses the local planning authority made a request for further information on 31.05.13. On the 04.06.13 and 05.06.13 the applicant's submitted amended and additional information.

As part of this submission they amended the outline planning application to a hybrid planning application (being a combined outline and full planning application), and changed the proposed development as described below. Consequential amendments were also made to the Environmental Statement.

A further submission was made by the applicant's on 31.07.13 comprising additional information and amended drawings. The amended drawings corrected anomalies in plans, provided topographical information, made changes to the Kingsland site to address comments of Natural Resources Wales. In addition a Statement of Intent as regards Archaeology and a Site Alternative Assessment was submitted.

## **Penrhos**

The application is made in outline form with all matters reserved except for means of access, for the following:

A leisure village comprising:

- up to 500 new leisure units including new lodges and cottages;
- Central new hub building comprising reception with leisure facilities including indoor sub-tropical water park, indoor sports hall, and cafes, bars, restaurants and retail;
- Central new Farmer's Market building;
- Central new spa and leisure building;
- A new café and water-sports centre at the site of the former Boathouse;
- Demolition of the Bathing House and the construction of a restaurant at its former location;
- Demolition of other non-listed existing buildings including three agricultural barns and three residential dwellings;
- Providing and maintaining 29 hectares of publicly accessible areas with public car parking and enhancements to the Coastal Path, including :
  - Managed walkways within 15 hectares of woodland, the retention and enhancement of Grace's pond, Lily Pond, Scout's pond with viewing platforms, the Pet Cemetery, War Memorial, the Pump House and picnic area with bird feeding stations and hides with educational and bilingual interpretation signage created throughout;
  - Creation of a new woodland sculpture trail and boardwalks and enhanced connection to the Coastal Path;
  - The beach will continue to be accessible to the public providing safe access to the shallow shelving water;
  - A Combined Heat and Power Centre

Access is included as a reserved matter and detailed plans are included with the planning application illustrating a new roundabout to replace the existing access adjacent to the Stanley Embankment.

The application was changed to a hybrid planning application and now comprises a full planning application in so far as it relates to the change of use for of the following buildings at Penrhos:

- The Bailiffs Tower and outbuildings at Penrhos Home Farm from a cricket clubhouse to a visitors information centre, restaurant, café, bars and retail;
- Home Farm Barn and Cart Buildings from farm buildings to cycle and sports hire centre;

- The Tower from residential to a Managers accommodation and ancillary office; and
- Beddmanarch House from residential to a visitors centre, which was included as part of the amended submission.

### **Land at Cae Glas**

The proposal is for the erection of leisure village accommodation and facilities which have been designed to be used initially as temporary construction workers accommodation complex for Wylfa B and subsequently for the development of holiday accommodation. Specifically:

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

Following the temporary use of the above this part of the development would subsequently be converted (post Wylfa B construction) into an extension to the Penrhos Coastal Park Leisure Village comprising:

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

Access is included as a reserved matter and detailed plans are included with the planning application. Access to Cae Glas will be via Parc Cybi and Lon Trefignath would be widened and a 3.5 meter shared footway cycleway provided for around 70 meters from an existing roundabout.

It is important to note that the legacy use of leisure accommodation will not come forward if the site is not first developed for nuclear worker accommodation.

### **Kingsland**

The proposal is for the erection of up to up to 360 new houses to be initially used as temporary construction workers accommodation.

In the submission it is stated that the properties at Kingsland will initially not have a kitchen and occupiers will be encouraged to use the eating facilities provided at Cae Glas. Additionally all nuclear construction worker occupiers of the units at Kingsland will have to arrive at Cae Glas to register and be allocated a room in a unit.

Following the temporary use the development would be converted (post Wylfa B construction) into up to 360 residential dwellings set in high quality landscaping and open spaces. This legacy use would, like the Cae Glas Site, not come forward if the site is not developed for nuclear worker accommodation.

Detailed plans for the proposed vehicular access to Kingsland onto the B4545 are included as part of the planning application, with visibility spays of 120metres either side of the access.

The application in so far as it relates to the outline element is supported by parameter plans which sets limits on the scale and layout of the development, which would need to be adhered to in subsequent reserved matters applications. Other plans showing layouts are not fixed and are illustrative only.

The proposal is for Cae Glas and Kingsland to come forward individually, however, if Cae Glas is not developed Kingsland will not come forward either.

## **3. Main Policies**

### **Gwynedd Structure Plan (November 1993)**

Strategic Policy 1 (Development Rate)

Strategic Policy 2 (Focal Centres)

Strategic Policy 3 (Scale Employment Opportunities)  
Strategic Policy 4 Protection and Enhancement of the Environment)  
Strategic Policy 5 (Welsh Language)  
Strategic Policy 6 (Scale, Rate and Phasing of Development)  
Policy A1 (Housing in the Plan Period)  
A3 (Housing Scale and Phasing)  
A6 (New Dwellings in the Countryside)  
A7 (Five Year Supply)  
A9 (Affordable Housing)  
B1 (Employment Generating Developments)  
C7 (Renewable energy)  
C8 (Energy Conservation)  
CH1 (Recreation and Tourist Development)  
CH2 (High Quality Holiday Accommodation)  
CH10 (Visitor Attractions and Countryside Recreation Facilities)  
CH11 (All Weather Facilities)  
CH12 (Waymarked Public Footpaths, Bridleways and Cycleways)  
CH18 (Major Recreational Routes)  
CH19 (Facilities)  
D1 (Environment)  
D4 (Location, Siting and Design)  
D5 (Development Along Coastline)  
D7 (Retention of Agricultural Land)  
D10 (Flora and Fauna)  
D14 Protection and Maintenance Broadleaved Woodlands)  
D15 (Archaeology)  
D17 (Reclamation of Derelict Land)  
D20 (Polluting Developments)  
D21 (Listed Buildings)  
D22 (Setting Listed Buildings)  
D27 (Conversion of Listed Buildings)  
D28 (Natural Mineral Slate)  
D29 (High Standard of Design)  
D32 (Landscaping)  
DD2 (Mineral Resources)  
DD3 (Evaluation of Mineral Resources)  
DD4 (Mineral Consultation Areas)  
DD5 (Transportation of Bulk Minerals)  
DD6 (Working of Minerals)  
DD7 (Restoration and Reasonable Beneficial Use)  
DD8 (Landbank)  
DD15 (Borrow Pits)  
FF11 (Significant Increase in Traffic Generation)  
FF12 (Parking Provision)  
FF14 (Facilities in Rural Car Parks)  
FF15 (Pedestrian, Disabled, Elderly , Pram and wheelchair Users)  
FF16 (Operational Needs of Public Transport)  
FF17 (Public Transport Facilities)

### **Ynys Môn Local Plan (1996)**

1 (General Policy)  
2 (New Jobs) (Proposal S1)  
3 (Ty Mawr Farm)  
5 (Design)  
8 (Holiday Accommodation)  
14 (Recreation and Community Facilities) (Proposal FF11)  
16 Recreation and Community Facilities  
26 Car Parking  
30 (Landscape)  
32 (Landscape)  
33 (Nature Conservation)  
34 (Nature Conservation)  
35 (Nature Conservation)

- 36 (Development on the Coast)
- 37 (Access to the Countryside)
- 39 (Archaeological Sites)
- 41 (Buildings of Special Architectural and Historic Interest)
- 42 (Design)
- 44 (Hazardous Installations)
- 45 (Renewable Energy Projects)
- 48 (Housing Development Criteria)
- 49 (Defined Settlements)
- 51 (Large Sites)
- 53 (Housing in the Countryside)

## **Stopped Ynys Môn Unitary Development Plan (December 2005)**

### Part 1 Policies

- PO1 (Employment)
- PO2 (Settlement Strategy and Hierarchy)
- PO3 (Language and Culture)
- PO4 (Integrated Transport and the Location of Development)
- PO6 (Working with Our Neighbours)
- PO7 (Tourism)
- PO8 (Environment)
- PO8a (Undeveloped Coast)
- PO8b (Energy Developments)

### Part 2 Policies

- GP1 (Development Control Guidance)
- GP2 (Design)
- EP1 (Land for Employment) (Allocation S1 Ty Mawr)
- EP2 (Protection of Employment Land)
- EP3 (Local Action Area)
- EP6 (Reuse of Buildings)
- EP18 (Renewable Energy)
- EN1 (Landscape Character)
- EN2 (Areas of Outstanding Natural Beauty)
- EN3 (Green Wedge)
- EN4 (Biodiversity)
- EN5 (International Sites)
- EN6 (International Sites)
- EN7 (Local Sites)
- EN9 (Development In Or Near Wetlands, Water Courses & Shorelines)
- EN12 (Archaeological Sites and the Historic Environment)
- EN14 (Tree Preservation Orders and Hedgerows)
- EN15 (Projects)
- EN16 (Landscape features of major importance for flora and fauna)
- HP1 (5 Years Housing Supply)
- HP2 (Housing Density)
- HP3 (New Housing Development – Main and Secondary Centres)
- HP6 (Dwellings in the Open Countryside)
- HP7 (Affordable Housing – Housing Need)
- HP8 (Rural Conversions)
- SG1 (Contaminated Land)
- SG2 (Flood Risk)
- SG3 (Controlled Waters)
- SG4 (Foul Sewage Disposal)
- SG6 (Surface Water Run Off)
- SG7 (Noise)
- SG9 (Hazardous Installations)
- TR3 (Highway Design)
- TR9 (Walking, Cycling and Horse Riding)
- TR10 (Parking Standards)
- TO1 (New Attractions and Extensions to Existing Attractions)

TO2 (Holiday Accommodation)  
TO10 (Recreational Routes)  
TO11 (Sports and Leisure Facilities) (Proposal FF6)  
TO12 (Sports and Leisure Facilities)  
TO14 (Amenity Space)  
MP1 (Aggregate Landbank)  
MP3 (Need for Minerals)  
MP6 (Exploration Works)  
MP8 (Sterilisation)  
MP9 (Use of Waste Materials)  
MP10 (Recycled Materials)  
MP11 (Transport)  
MP12 (Reinstatement)  
MP13 (Control Criteria)

Isle of Anglesey Council Interim Planning Policy: Large Sites (February 2011)

Isle of Anglesey Council Affordable Housing (2004)

Isle of Anglesey Council Holiday Accommodation (2007)

Isle of Anglesey Council Parking Standards (2008)

Isle of Anglesey Council Planning and the Welsh Language (2007)

Isle of Anglesey Council Planning Obligations (Section 106 Agreements) (2008)

Isle of Anglesey Council Design in the Urban and Rural Built Environment (March 2008)

Isle of Anglesey Council Affordable Housing Delivery Statement (AHDS) (2009)

Isle of Anglesey AONB Management Plan 2009-2014

Isle of Anglesey Council Wylfa Nuclear New Build:  
Construction Workers Accommodation (March 2011)

Isle of Anglesey Council Destination Management  
Plan 2012-2016 Delivery Plan (June 2012)

Department of Energy Climate and Change - National Policy Overarching National  
Policy Statement (EN-1)

Department of Energy Climate and Change - National Policy Statement for Nuclear Power Generation (EN-6)

Regional Planning Guidance for North Wales.  
Adopted.(October 2002)

Planning Policy Wales (Edition 5, November 2012)

Technical Advice Note 2: Planning and Affordable Housing (2006)  
Technical Advice Note 5: Nature Conservation and Planning (2009)  
Technical Advice Note 6: Planning for Sustainable Rural Communities (2010)  
Technical Advice Note 8: Renewable Energy (2005)

Technical Advice Note 10: Tree Preservation Orders (1997)  
Technical Advice Note 11: Noise (1997)  
Technical Advice Note 12: Design (2009)  
Technical Advice Note 13: Tourism (1997)  
Technical Advice Note 14: Coastal Planning (1998)

Technical Advice Note 15: Development and Flood Risk (2004)  
Technical Advice Note 16: Sport Recreation and Open Space (2009)

Technical Advice Note 18: Transport  
Technical Advice Note 20: The Welsh Language – Unitary Development Plans and Planning Control (2000)  
Technical Advice Note 22: Sustainable Buildings (2010)

The Wales Spatial Plan (2008)

Mineral Planning Policy Wales 2000  
Mineral Technical Advice Note 1 – Aggregates

Circular 11/99 Environmental Impact Assessment (1999)  
Circular 1/98 Planning and the Historic Environment: Directions by the Secretary of State for Wales (1998)  
Circular 13/97 Planning Obligations (1997)  
Circular 61/96 Planning and the Historic Environment: Historic Buildings and Conservations Areas (1996)  
Circular 60/96 Planning and the Historic Environment: Archaeology (1996)  
Circular 35/95 The Use of Conditions in Planning Permissions (1995)  
Circular 16/94 Planning Out Crime (1994)  
Circular 5/93 Public Rights of Way (1993)  
Circular 38/89: Landfill Sites: Development Control (1989)  
Circular 22/87 Development of Contaminated Land (1987)  
Welsh Government Circular: 07/2012: The Town and Country Planning (Notification) (Wales) Direction 2012 (2012)

Anglesey and Gwynedd Joint Local Development Plan – The Consultation Draft Preferred Strategy Document (May 2013)

#### **4. Response to Consultation and Publicity**

##### **Members for Caergybi**

**Councillor Robert Llewelyn Jones** Requested information regarding the number of houses that are part of the Unitary development Plan, also the total amount of houses that have received planning permission. He commented that I am as are many of my constituents concerned at the amount of houses that have already been approved on the Island. This information is requested and should be available for officers to make a recommendation on the application.

In addition information is requested on the effect of so many houses on Social Services, Schools and the Welsh Language. He commented that infrastructure was not built to cope with so many residential properties and yet little mention is made of this by planners.

It would appear that developers build houses and leave it to the local residents to provide the support services that need to go with the developments.

Can I also have a business plan to show where the jobs are? Will they be seasonal as I cannot see that we have the weather for a year round outside entertainment centre? I am concerned at the number of jobs claimed as part of the project. I cannot see how hundreds of people are needed to run a theme park that will be open for possibly four months a year.

How will the present Anglesey Aluminium Plant site operate alongside a theme park if as proposed and passed by planners for a bio mass-mass plant to be set up? It is a well-known fact that there will be pollution generated from the plant. We could find that to give permission to this plan would compromise an industrial development with hundreds of jobs.

EN13 – Conservation of Buildings – the character and appearance of all designated conservation areas must be protected from unsympathetic development. Buildings of special architectural and historic interest and their settings must be protected from unsympathetic development alterations or demolition. I am aware that there are a number of such buildings on the site.

As a Council we have adopted comprehensive supplementary planning guidance on “Design in the Urban and Rural Built Environment” and this states – A residential property must never detract from the visual qualities of the AONB- We are talking about hundreds of residential properties here. I cannot see how this large scale development can possibly meet this high expectation and just blend into the background.

Residents I speak to feel strongly about the scale and nature of the proposed housing and yet we as members have already passed plans that are supposed to put a cap on housing in Ynys Mon. Can you please explain how and why we just continue to allow houses to be built far in excess of the guidelines that we have agreed to as a council?

I am in favour of a full public meeting on this and as yet this has not been forthcoming. Our constitution is clear in its objective to ensure that the public have a clear understanding of what is being put forward and for them to have their voices heard. It would appear that that the six local members will only be allowed to speak on this application and not one of them will have the right to vote. This is why it is so important for us to be able to engage with the public and for their voices to be heard. Ynys Cybi appears to be seen as a housing development site and this is not what the local residents want and is not what the Unitary Development Plan gives authority for.

In a further letter the local member expresses concern about the lack of public consultation, the scale/number of housing developments approved in Holyhead amounting to 1130 including the holiday accommodation. The development lies outside the settlement boundary of Holyhead and is at odds with the employment allocation for Cae Glas. The applicant's statement as regards what would happen in economic terms if permission is refused is at odds with the fact that Cae Glas is in an employment allocation. Objection is raised to the applicant's assessment of the weight to be attributed to the development plan, seasonal nature of the jobs and questioned whether locals will benefit, site's location in an AONB and the overriding national need questioned, why is it necessary to have development on the coast and what other sites have been considered. It is questioned how the council will ensure that holiday occupancy conditions are adhered to, implication of National Planning Policy Statements on Nuclear workers in relation to local democracy. Approval of housing would pre-determine a decision about the scale and location of development in the LDP and public consultation. Cae Glas is within a green wedge, undeveloped coast. Inaccessibility of the cricket pitch. The Council's Education Section have not been consulted, the views of the local Health Board on the effects of the development are essential, negative effects of housing large workforce next to Holyhead, effects on public transport, impact Welsh language – public debate required about the proposals.

### **Members for Ynys Gybi Ward**

**Councillor Trefor Lloyd Hughes** The main development at Penrhos Nature Reserve is not within an area I represent however the Cae Glas and Kingsland part of the development are within the Ynys Gybi Ward.

In view of the above I would appreciate if you could take note of the above when the site visit takes place in Cae Glas and Kingsland area.

Due to other commitments I shall not be able to attend.

I would ask that the committee look at the Kingsland development from the end road where the leisure centre and football field are located. It is easily accessible. At the end of this road there is a gate where the committee can look at the proposed developments location (there is a gate at the end of the road to the field, and it is this field that the proposed development will take place).

Further to that, I ask if you would also look at this site from another angle and that is from the location of "Overdale" Mill Road, Holyhead.

"Overdale" is located in Mill Road approximately 1 mile from the junction of Mill Road and Treaddur Road in Kingsland. I have spoken to the owner of "Overdale" and he has agreed to allow the Committee to use his land to look at the development location, which by the way comes up to the boundary of "Overdale". I would ask this so that the committee can view from all areas. This view will be looking back towards the leisure centre from the Porthdafarch area.

In a letter to the council's Highways Section a letter is enclosed from a constituent living along Trefignath Road. The councillor states that they are very familiar with Trefignath Road and that it is now used more than it has ever been used, the councillor explains that they nearly had an accident on this road and had to stop 3 times to give way. The council's Highways Section is requested to note the seriousness of the situation.

**Councillor Dafydd Rhys Thomas** Application needs a site visit. General opinion is that the scale of the development is too big. Needs to be discussed by the Full Planning Committee.

In further comments, I cannot support the Kingsland part of this development – as it is out of all proportion, and contrary to policy?



**Holyhead Town Council:** Satisfied for the application to be considered in outline form. Recommend that some form of transport is provided to link the proposal to Holyhead Town, Newry Beach and the Breakwater and that during the construction phase the developers employ local people.

Following the second round of consultation Holyhead Town Council re-asserted its original decision to support the application and to request that due to the amended changes that the developer holds a further consultation in the town with the community and that time is allocated at the end of the consultation day to provide feedback & consultation with the community.

**Llanfachraeth Community Council:** Object on the following grounds:

- View, disturbance, noise, inshore boats.
- Only part of the scheme received. Need more information (everything).
- Workers from where?
- Local businesses losing out.
- Need to distribute across the Island.
- Benefit to local people? (None)

**Trearddur Bay Community Council:** Concerns raised regarding environmental impact and effect on the wildlife. Given the scale of the development the Community Council considered there should be a separate public consultation on the three sites separately.

Following the second consultation the community council have objected to the planning application.

The scale of the development in an AONB and SSSI is totally inappropriate. If the temporary accommodation for nuclear construction workers will be on the level proposed the incoming workforce could severely make an impact on all the local community and ruin their traditional way of life. The adverse effect of the incomers will compromise and create a severe conflict of interest, not just in the local vicinity but also further afield.

The community council is also very concerned about the site access to the site. There are other factors such as the possibility of additional police being required and the ability of other services to cope with the impact of such a massive development.

There are also great reservations on developing the green field site between Trearddur Bay and Holyhead and the need for 360 private dwellings is questioned.

There are grave concerns at the safety aspect of the junction with the B4545.

**Valley Community Council:** Despite assurances provided by the Officers, members continue to be concerned about such a project, which they believe will have a considerable effect on the wider community and wish to table their concerns in writing, so that they may be considered by the Council.

1. There is significant concern about the size of the development and its impact, in particular:-
  - The detrimental effect it will have on the natural landscape within a designated AONB.
  - Increased pressure on the existing road network and the environmental impact of any plans to strengthen existing road infrastructure.
  - Increased pressure on existing services, e.g. schools, doctors/hospitals, policing. This is of particular concern at a time when the NHS, Local Council and North Wales Police are already highlighting that existing budgets are under pressure and that more cuts in service are inevitable.
  - The possible impact on both local culture and the Welsh language, particularly if there was an influx of foreign workers.
2. The Kingsland Development –
  - A need to ensure that local housing need is considered, particularly the need for social housing to rent at a time when so many local families are going to be heavily affected by the impending Bedroom Tax being imposed by the Government.
  - There was some concern at the statement “up to 50% affordable housing”. The statement was met with some scepticism, as a result of developments, with a percentage of affordable housing, being approved in Valley in the past. Commuted sums had been paid by the developer; however, these had not resulted in affordable homes being built in the village for local people. Whilst it is appreciated that this fell outside the officers’ remit, it is nevertheless a valuable point for future consideration.

3. Concern about the quality and the number of likely jobs within any leisure village/temporary accommodation complex for Wylfa Workers. Historically, these types of jobs have been low paid.

In further comments Valley Community Council continues to express concern about the project, which consider will have a considerable effect on the wider community. The following concerns are expressed:

1. There is significant concern about the size of the development and its impact, in particular:-

- The detrimental effect it will have on the natural landscape within a designated AONB.
- Increased pressure on the existing road network and the environmental impact of any plans to strengthen existing road infrastructure.
- Increased pressure on existing services, e.g. schools, doctors/hospitals, policing. This is of particular concern at a time when the NHS, Local Council and North Wales Police are already highlighting that existing budgets are under pressure and that more cuts in service are inevitable.
- The possible impact on both local culture and the Welsh language, particularly if there was an influx of foreign workers.

2. The Kingsland Development -

- A need to ensure that local housing need is considered, particularly the need for social housing to rent at a time when so many local families are going to be heavily affected by the impending Bedroom Tax being imposed by the Government.
- There was some concern at the statement on affordable housing. The statement was met with some scepticism, as a result of developments, with a percentage of affordable housing, being approved in Valley in the past. Commuted sums had been paid by the developer; however, these had not resulted in affordable homes being built in the village for local people.

3. Concern about the quality and the number of likely jobs within any leisure village/temporary accommodation complex for Wylfa Workers. Historically, these types of jobs have been low paid.

**Rhoscolyn Community Council** – “Penrhos Leisure Village” though the development is not within the area of the community council, concern was expressed in respect of the development and the developer's ultimate motive, the effect on the area, especially the Welsh language, when considering the significant increase in the number of houses. There was strong and clear opposition to the construction of 300 houses in Kingsland. Though accepting that there are advantages to part of the development (work and improvement of public facilities) there was great uncertainty about approving a development of this scale in the area.

Concern expressed that a disk was provided to show the plans. Concern was expressed that this could become the norm. For a small community council like Rhoscolyn this is not convenient nor is the facility available to view disks in community council meetings. To ensure that all councillors could view the plans they would need to view disks on their personal pc's. It would be much better to continue sending paper copies even if this means having them slightly smaller than at present.

**Llanfaethlu and Llanfwrog Community Council** No objections.

**Crown Estate Office:** No formal response.

**Highways:** In relation to the initial application proposal Messrs Mott MacDonald were commissioned to assess the Transport Assessment submitted with the application. Raise no objections subject to the planning obligations and conditions recommended.

In subsequent correspondence a letter is provided from Councillor Trefor Lloyd Hughes and an electorate from Trefignath Road (The letters are detailed separately in the appropriate sections of this report). It is considered necessary and reasonable to request a contribution from the applicants to request a financial contribution for the provision of passing places along Trefignath Road.

In the past discussion has focussed on preventing users of Cae Glas using Trefignath Road, it is considered to provide some passing places as it is unavoidable that there will some additional movement along the road as a result of the development.

**Maritime Officer** No observations.

**Natural Resources Wales:** Our comments on the proposal should be read in conjunction with our previous observations. We have previously objected to the proposal because of our concerns over the impact on the AONB. Changes in the proposal have mitigated the impacts and we understand that there will be further negotiations between developer and LPA over the details of the application.

Our concern over the overall impact on the AONB remains and while we have no objection to the proposal in principle, we would expect the LPA's decision to follow the guidance in PPW on development in AONBs.

## **Biodiversity**

*Glannau Ynys Cybi Special Area of Conservation (SAC)* - The measures relating to controlling access to the site seem appropriate providing that the control measures can be suitably conditioned and are capable of implementation.

*Cae Glas Nature Reserve* - There is some doubt whether the nature reserve, to be established at Cae Glas, is offered as compensation for the environmental impacts of the proposal as a whole, or would also be offered if parts of the application were refused. NRW consider this should be seen as compensation for any or all of the development.

## **Landscape and Visual Impact**

We note that this application is in outline and we understand that the design detail will be the subject of a future planning application, and is the subject of on-going discussions with the developer.

*Kingsland* - NRW's primary concern is the impact of developing a large housing estate in open countryside within the AONB. If the local planning authority decides to approve the application NRW recommends the following mitigation.

Additional Mitigation - Development in the AONB must be exemplary, a "normal" housing estate design will not suffice. The development must reflect the landscape designation and the rural location and not be as presented in the photomontages and plans - a very visible sprawling urban mass in the landscape. NRW are of the opinion that the following mitigation, in addition to that initially suggested by the developer will assist in ameliorating impact:

- Introduce a 10-15 m wide planted bund along the B road. This mitigation will screen the development and would to a certain extent keep the feeling of a green wedge that separates Holyhead from Trearddur.
- Urban forest – Introduce the appropriate amount of Forest trees to the site. The trees will be planted in allocated areas to soften the appearance of the development and break up the scale of the development views. These areas should be managed in "perpetuity".
- The houses will be built from natural materials wood/stone to aid integration into the surroundings. No bright colours will be used.
- Long term management of all hedges and planting schemes will be secured.
- Avoid using intrusive light

*Penrhos* - Our main area of concern here is regarding development of the open headland and change of character from undeveloped to developed. The development as seen from Arthur's Seat in particular highlights this point. We also believe that there is an over reliance on tree planting to mitigate impact given the exposed nature of this landscape.

We are also concerned regarding the impact of the new bathing house. We question the appropriateness and scale of this type of building in this landscape. We advise that this issue is resolved between the developer and IoACC, we have similar concerns regarding the development of the boat house.

The following additional mitigation is proposed:

- Re-orientation of lodges in the Eastern area to reduce impact on views from Arthurs Seat. (as per photomontage submitted to NRW on 27th June)
- Hub building – Its current design resembles a warehouse form. This is inappropriate for this location. The developer needs to reconsider the design and find ways of "breaking up the roofscape".

- Building designs must be exemplar and built to the highest BREEAM environmental standard.
- Buildings must be made of natural materials, using recessive colours, and the appropriate use of overhangs to reduce glare from glass.
- Make more use of 'green' roofs - there must be a good balance of shingle/sedum roofs.
- The planted areas and woodland must be managed in perpetuity.
- Avoiding intrusive lighting.

Given that no detail ground investigations have been undertaken then there is a degree of uncertainty as to whether the lodges will sit in the landscape as perceived by the developer. There must therefore be flexibility in the height parameters to allow for such eventualities. The design must "work with ground conditions". This is an issue that the LPA will need to resolve with the developer. NRW recommends that detailed ground levels are provided as part of consultations on the detailed application.

AONB Policy Issues - Minimization of environmental impacts is particularly important when development is undertaken in an AONB, and the conservation of the qualities of the AONBs and National Parks is a statutory duty for relevant authorities under Section 85 of the Countryside and Rights of Way Act 2000 (AONBs). PPW (5) paragraph 5.5.5 states that "Statutory designation does not necessarily prohibit development, but proposals for development must be carefully assessed for their effect on those natural heritage interests which the designation is intended to protect."

We would also refer the LPA to para 5.5.6 which lists the tests which major development proposals which are more national (UK) than local in character must pass in AONBs, namely; "there is demonstrated to be an overriding public need and refusal would be severely detrimental to the local economy and there is no potential for locating the development elsewhere or meeting the need in some other way."

In reaching the proper planning balance in the AONB, the LPA will therefore have to consider under the terms of PPW whether there is sufficient evidence that there was an overriding public need for the housing at Kingsland with no potential for locating the development elsewhere. The same would apply to the need for temporary accommodation, where it would also have to be shown that the need could not be met in some other way.

With regard to the long term tourist accommodation, the LPA will have to consider, given that the developers do not consider that they could locate the development elsewhere or meet the need in some other way, whether there is sufficient evidence that there is a overriding public need for this component of the proposal.

Socio Economic Issues - In determining the application, it will be for the LPA to reach the right planning balance between environmental impacts and socio-economic benefits, and we have no further detailed comments to make on the additional socio economic information.

### **Economic Development:**

#### **In initial comments:**

A proposal of this scale on Anglesey is a unique opportunity to transform the socio-economic fortunes of the Island (potentially for generations). The Island has over recent years suffered the lowest GVA in the UK, endured outward migration of 16-24 year old, increase economic inactivity and so on. This proposal (along with other major energy related development) will hopefully change this trend and this point needs to be made explicit.

### **Displacement**

The EDU welcomes the inclusion of Chapter 2 of the Report which focuses specifically on displacement effects. The EDU's initial concern was that the proposed development could potentially result in the displacement of existing jobs from the tourism (and other) sector which would have a detrimental effect on the island tourism sector.

This Report confirms that any local displacement effects will be negligible, with any displacement that does occur being from other UK Center Parcs and similar leisure destinations. The Report also states that the threat of displacement/competition is what drives product innovation and improvement in the tourism industry and the development is likely to serve as an impetus for others to raise standards in what is a quality driven

market.

Although the EDU do not disagree with the above statement, what would be beneficial would be to get the views of tourism providers/partnerships (such as the North Wales Tourism Partnership, Visit Wales etc) to validate and support this statement. The EDU recognise that the views of existing accommodation providers has been included (which is obviously welcomed), but having the views of the tourism partnerships ensures that the wider views of the tourism sector are captured.

Another issue which needs to be considered and strengthened in the Report is addressing the level of 'churn' of tourism jobs in the sector (during peak and off-peak seasons). This would demonstrate whether there is a risk of displacement in the sector or whether it's something that occurs anyway due to the seasonal nature of the tourism sector. The Report would also benefit from explaining the wider multiplier effects of the development on the Island. This would provide additional justification for the scheme as the effects (and therefore the benefits) would be felt across the Island. A commitment from Land & Lakes that supply and demand of work if from local jobs/skills would also be beneficial and this would provide additional justification to prevent leakage of local people/jobs.

### **Leisure**

In terms of public access mentioned by the Leisure Services above, given the high quality nature of the Leisure Village it is envisaged that the cost to attend such an establishment will be comparable to the quality of the services being provided. As such this effectively 'prices out' many local residents and as such mitigation for off-site leisure facilities of some form will be sought from the IACC as a community benefit contribution. Having high quality leisure facilities on the doorstep is of little benefit if local (Anglesey) residents cannot access them. The Report would be improved if these points were clarified.

### **Welsh Language**

The Report states that due to the number of local jobs the proposed development is likely to create, this will keep local young people in the area and as such no impact will be had on the Welsh Language. Given the relatively long construction phase of this project (8 years) and given that the Cae Glas site may be used to house approximately 2,000 Wylfa Nuclear New Build construction workers, Economic Development Unit, I.A.C.C. April 2013 further detail is required on how the impact on the Welsh Language will be addressed and mitigated during these stages of the development.

### **Transport**

Although not directly related to this Report, there is a close correlation between transport and economic development as transport constraints/opportunities can impact upon economic performance. The EDU would therefore request that Land & Lakes address the points raised in the initial response to the transport issues relating to cumulative impacts associated with the Wylfa construction workers accommodation.

### **Conclusion**

Overall this was a very good and welcomed response by Land & Lakes (Regeneris) to the initial concerns raised by the EDU. There are still some elements which require further clarification, however if these issues are addressed in the same vein as this Report then the EDU would be confident that the development proposal coming forward would be robust.

The EDU would request that Land & Lakes engage with the Unit as soon as possible to discuss mitigation relating to the development and any potential community benefit contributions. This would ensure that the socio-economic opportunities from the developments are fully realised for the benefit of both the developer and the Isle of Anglesey. Given the employment, economic and regeneration potential of the proposed development, the EDU remain principally supportive of the development subject to s.106 conditions to be agreed.

The EDU subsequently commissioned URS consultant to undertake a social and community infrastructure study to assess the impacts of the proposed Land & Lakes development on existing provision. This response by the EDU provides the necessary evidence base to support the mitigation measures requested so that the Land & Lakes proposal does not adversely impact upon existing social and community infrastructure provision.

## **Background**

In November 2012, Land & Lakes submitted an outline planning application (ref. 46C427K/TR/EIA/ECON) for a Leisure Village (inter alia) and construction workers accommodation for Wylfa Nuclear New Build at Penrhos, Cae Glas and Kingsland, Holyhead.

Following a consultation request by the Planning Service, the Economic Development Unit (EDU) formally responded on the 19th December 2012. In response to the EDU's consultation response, Regeneris Consulting (on behalf of Land & Lakes) prepared an additional Socio-Economic Evidence Base Report which addressed some of the issues raised by the EDU (under a Regulation 19 Request for further information). The EDU responded to Regeneris (19th April 2013) and Regeneris subsequently amended the Report and submitted an addendum in June 2013. Part of this work included an assessment of the proposed schemes impact on social and community infrastructure. The EDU have again provided a response to the later report (24th June 2013) with specific reference to the contributions that the Unit felt are required from the project applicant to mitigate against the proposed scheme's impact on social and community infrastructure. However there is currently a lack of evidence base to support the EDU's position. The Report produced by URS (Appendix 1) reviewed and critiqued the information and evidence base provided by Regeneris, it identified the evidence base for the study area and then highlighted the gaps in social and community infrastructure provision.

## **Study Approach**

It is important to be clear as to the services that are considered under the definition of social and community infrastructure. Following discussions with the EDU, the following areas of study were considered:

- Education – primary and secondary schools
- Health – primary care and community health
- Recreational/Leisure facilities (excluding open space)
- Emergency services – fire & rescue, police, ambulance

## **Summary of Findings**

### **Education**

At this point in time it is difficult to be precise as to the future demand in terms of school places resulting from the phases of the proposed Land and Lakes scheme. This will ultimately be dependent on the extent to which construction workers are in-migrants to the area and they bring their families with them.

The overall demand for education places in primary and secondary schools can be accommodated by current surplus capacity in the impact area, although this position is likely to change due to current plans for school reorganisation.

Land & Lakes however, should make financial contributions toward the funding for additional school places created by the different phases of the Land and Lakes development. In addition the applicant should work with the authority and Horizon to understand and monitor the nature of demand from the different phases of development, particularly the workers accommodation phase as this demography will influence what additional demands are placed on existing education provision.

### **Health**

The proposed development is likely to place greater demands on existing health provision than was stated in Land & Lakes' application and supporting documents. In particular, demands on GPs are expected to be greatest from the proposed development as well as the minor injuries unit in Holyhead. With the higher-risk nature of the outdoor leisure tourism and construction workforce the actual additional demands on the existing health provision may be greater than those identified. It is also likely that the nuclear new build construction accommodation and Kingsland permanent residence phases will place greater demands on existing GPs, dentists and hospital provision in the impact area, which may have knock on effects for the rest of Anglesey.

Given this additional demand on already oversubscribed health provision, the IACC would expect contributions from Land & Lakes to meet the estimated demand and that medical provision on and off site will be adequate to meet demand. Provision and contribution towards medical care such as GPs and dentists will be necessary to accommodate the additional demand posed by the development.

## **Leisure**

The impact area already has a current deficit in the provision of leisure centres per person and the proposed development will exacerbate this unless suitable leisure facilities provided by the developer include access to any new facilities on site to the local population or the provision of new facilities outside the proposed scheme location.

Facilities offered by the existing leisure centre in the impact area will also face additional demand from the proposed development, particularly from the nuclear new build construction accommodation phase.

Provision of fitness centres within the impact area is also at a deficit compared to the standard provision of people per centre across the rest of Anglesey. Further demand is likely to be created by the proposed development in different phases, particularly during the nuclear new build construction phase and Kingsland permanent residency phase. Therefore a contribution toward the provision of publically accessible fitness and sports facilities should be provided off site or suitable facilities within the development should ensure access to the local population and construction workers to alleviate demands placed on existing provision.

Publically accessible swimming pool provision in the impact area is slightly under provided at the current time. With all phases of development there is likely to be additional demand on swimming facilities. With the absence of specific detail on swimming provision and timing of this element of the development it is difficult to understand the extent to which the applicant is mitigating this impact/additional demand. As such a contribution toward off site provision or access to on-site swimming provision should be included within the mitigation provided by the applicant as part of Section 106 and community benefits package.

The analysis of the impact on open space by the JPPU makes a case for the provision of outdoor sport, playing pitch and equipped children's play space – as such this should be included in the list of requirements for mitigating development impacts.

## **Emergency Services**

Emergency services are already constrained in Anglesey and the impact area, and the proposed development may exacerbate this. Whilst the fire and rescue service has access to additional resources on the mainland the two fire and rescue stations in the impact area may not be enough capacity to cater for the additional demand. The police service in Anglesey is already under capacity compared to capacity across England and Wales, though the department are planning to expand their capacity by building a new station in Llangefni. Documentation of ambulance provision in Anglesey indicates that the service already underperforms compared to the rest of Wales, which suggests that the proposed development may place further strain on existing provision.

Further discussions will be required between the developer, the IACC and the emergency services to ensure that adequate provision of emergency services are in place for all stages of the development (particularly during the Wylfa construction workers accommodation phase).

## **Conclusions**

Based on the available evidence and analysis undertaken, the EDU considers the following to be necessary to mitigate any impacts from the Land & Lakes development.

**Leisure** – A new off-site leisure centre facility is required in order to meet the increased demand as a result of the Land & Lakes development. Details of the leisure facility (i.e. in terms of scale, location, design etc.) will be discussed with Land & Lakes during the s.106 negotiations.

**Education** – The IACC will seek financial contributions toward the funding for additional school places created by the different phases of the Land and Lakes development. In addition the applicant should work with the authority and Horizon to understand and monitor the nature of demand from the different phases of development, particularly the workers accommodation phase as this demography will influence what additional demands are placed on existing education provision.

**Health** - The Land & Lakes development is expected to place greater demands on health provision than stated in the application. With existing provision already over capacity, the IACC will seek financial contribution towards a new medical facility which includes GP surgery, dentists and other associated healthcare provision. With the higher-risk nature of the outdoor leisure tourism and construction workforce

the actual additional demands on the existing health provision may be greater than those identified. This therefore needs to be adequately mitigated through developer contributions.

Library provision – the proposed development should contribute towards increasing the capacity of existing facilities in the impact area (Holyhead and Rhosneigr), particularly to account for the demands from the nuclear new build construction accommodation and Kingsland permanent residence phases. The IACC will therefore seek financial contribution to provide these additional facilities.

Emergency services - further collaboration between Land & Lakes and the emergency services is needed to identify what additional support or capacity is needed for existing provision in Anglesey. In particular, contributions toward ambulance provision and policing (particularly during the Wylfa construction workers accommodation phase) may be needed to minimise the impacts caused by additional demand.

Work by the JPPU suggests an existing deficit of open space provision which will be exacerbated by the Land and Lakes development. As such, further negotiation with Land & Lakes is required in order to establish how more open space provision can be provided in the study area.

In addition the EDU units have confirmed in a letter to the applicant's:

As specified in the EDU'S consultation response on the 19 December 2012 and again on 24 June 2013, given the employment, economic and regeneration potential of the proposed development EDU have been supportive from the outset (subject to 106 obligations being agreed). This position has not changed for the following reasons:

- a) Given the number of large scale industrial closures, downsizing, and redundancies on the Island over recent years (Anglesey Aluminium, Welsh Country Foods etc.) there is undoubted need for strategic investment to create substantial new employment and economic opportunities on the Island. Given the scale of opportunities from the proposed Land and Lakes development, this proposal is seen as a socio-economic catalyst which could stimulate economic growth.
- b) The Land & Lakes development is recognised in the recently adopted Anglesey Destination Management Plan (DMP) 2012-2016 as a potential transformational development for the Island sector, by creating a high quality "destination resort".
- c) It is anticipated that the development will create on average 420 jobs during its 8 year construction, a large proportion of which could be secured by Anglesey residents.
- d) It is estimated that the project will result in 465 direct operation jobs (on site) when complete, of which between 350 and 420 will be taken by Anglesey residents. It is also estimated that the project will result in 80 indirect off site jobs and 30 induced off-site jobs of which between 75% and 90% will be taken by Anglesey residents. Regeneris (on behalf of Land & Lakes) has looked at the issue of displacement, and the EDU is satisfied that this will not impact on tourism sector.
- e) The Holyhead Travel to Work Area (TTWA) now has the highest Job Seekers Allowance (JSA) rate, and the second lowest job density rate of an TTWA in Wales. Persistent long-term poverty, deprivation, inactivity and joblessness in Holyhead has been a problem for many years. This has been further compounded recently with the closure of major employers such as Anglesey Aluminium and Eaton Electrical. The employment opportunities from the Land and Lakes development are therefore critical to hopefully transform the socio-economic fortunes of Holyhead.
- f) The supply chain opportunities and economic spin-offs from the proposed development are considerable. With potentially 3,500 Wylfa construction workers on site, the development could be the catalyst to regenerate Holyhead and the surrounding area.

The EDU is confident that if the mitigation measures identified are addressed in the same positive vein as the approach to the application, then the mutual benefits from the scheme (from a socio economic and environmental perspective) will be considerable.

Given the location of the development the EDU reminds the developers of the importance of public access and open space. This again will be something to discuss further in the 106 negotiations.

The Land & Lakes development is an opportunity to transform the economic, environmental and social composition of Holyhead and the surrounding areas, which given the current economic climate is extremely positive and very much welcomed. Over recent years Anglesey has witnessed steady economic decline resulting in one of the lowest GVA in the UK. With the proposed new nuclear build at Wylfa, Land & Lakes, Celtic Array, Lateral Power and a number of other major developments proposed on Anglesey, this is a unique opportunity to capitalise on these substantial inward investments for the benefit of Anglesey and North Wales.



The Land & Lakes development is an integral part of this transformation which will hopefully bring economic benefit to Holyhead, Anglesey and North Wales.

In a further e-mail it is explained that there is concern amongst visitor/tourism related businesses on the Island that the development could impact negatively upon their businesses. Given the scale of this proposal, it is important that it integrates and supports the further development of Anglesey's tourism economy. We are of the view that dedicated resources should be provided by the developer during the build and initial operational stage of the Leisure Village to co-ordinate dialogue and integration with the wider tourism sector. This is necessary to ensure Anglesey benefits fully from the development.

**Lifelong Learning Department:** If Planning Application number 46C427K/TR/EIA/ECON were to go ahead, according to the formula, the Lifelong Learning Department of Anglesey Council would require contributions towards:

1. A new primary school in the Kingsland area of £1,534,592.
2. The education of 16-18 year olds at Holyhead High School of £281,724.
3. Additional resources at Holyhead High School for 11-16 year olds
4. A new Language Centre
5. Further development of local Youth Centres.

**Environmental Services (Health):** Have made various comments with respect to the noise assessment, health and safety, water supply and food hygiene.

In relation to the amended proposal subject to the re-consultation have stated that the applicant should be aware that the council are in the process of designating the whole of Anglesey For Additional Licensing of Houses in multiple occupation (HMO'S) which covers most rented property with three or more occupiers forming two or more households, regardless of how many floors a property has.

**Emergency Planning:** I assume the developer is aware of the high pressure gas pipeline in the Cae Glas development (your records will qualify) and how this may affect the construction of the bund and lodges near the A55?. I assume this remains the main gas pipe into Holyhead and formerly supplied the aluminium works?.

As you are aware the former AAM site was a Top Tier COMAH site and any future development of this industrial site may be restricted by these proposed neighbouring developments?. Should the former AAM site be developed for a hazardous process with off-site consequences if there is a major event at that site, then that operator would have to make necessary arrangements to minimise the risk to the neighbouring public from harmful effects. Your records will qualify if the other operational factory for Aluminium Powder retains its status as a lower tier COMAH site which will not impact on the development?

**North Wales Fire Service:** No objection in principle to the application. Request to be consulted when additional details are submitted.

In relation to vehicle access the Fire Authority have no objection in principle to this application provided that all applicable sections of Approved Document B.B5 Section 16 Vehicle Access, pages 109-111 are complied with.

**Footpaths Officer:** Almost 3km of the coastal path passes through the Coastal Park, and is a valued asset for the coastal path as a long distance route, as well as for local use. We are keen that the Coastal Path is formalised into a Public Right of Way (PRoW) and would welcome the dedication of the footpath as such as part of any development of the site.

Should the application be approved, we wish to ensure that the coastal path is unaffected by the development and that the route be kept available and safe whilst any works progress.

**Welsh Water:** The proposed development would overload the existing public sewerage system and there are no improvements planned within Dŵr Cymru Welsh Water's capital investment programme and as such they object to the proposed scheme.

**The Council for British Archaeology:** No comments at this stage but are keen to be involved in the process.

### **Gwynedd Archaeological Planning Services:**

Numerous documents have been submitted with this planning application highlighting the significance of the historic places, monuments, buildings and landscapes that will be affected by this development proposal. These reports have documented the known resource and have assessed the impacts the proposals might have on both individual archaeological remains and the wider historic environment. These include a Historic Landscape Characterisation study (Gwynedd Archaeological Trust Report 1047) and an Archaeological Assessment (Gwynedd Archaeological Trust Report 968).

Further to these studies and in order to meet the requirements of Welsh Office Circular 60/96 (Planning and the Historic Environment: Archaeology) paragraph 13, a geophysical (magnetometer) survey of the development area was undertaken and a programme of targeted intrusive evaluation trenching was commissioned. These results were reported on in Gwynedd Archaeological Trust Report 1050.

The results and recommendations of these studies have been summarised in the Archaeology and Heritage chapter (Chapter 11) of the Environmental Impact Assessment. However, the studies which accompany the planning application are limited by:

- the nature of the application (in that the development area is extensive and is spread over three large sites) and,
- the detail included within the application (in light of the application being an outline application with all matters reserved).

As a result this application is less well documented than would be expected given the general sensitivity of the historic environment, the significant archaeological potential and the number of designated historic assets within the site.

Historic buildings and landscapes - The development site at Penrhos affects a historic park and garden with at least 500 years of recorded history. The site includes 7 listed buildings along with numerous undesignated historic garden features. Although CADW has not included Penrhos on the list of Historic Parks and Gardens of Historic Interest in Wales the area is of regional significance and numerous recommendations have been included within the Characterisation and Archaeology and Heritage chapter including a conservation management plan. Such a study would be essential to help inform a programme of informed conservation. In order to secure such a study, it is recommended that a planning condition is attached

Historic buildings and other above ground archaeological remains - Historic buildings and other above ground archaeological remains

The proposals must preserve and enhance the setting of all designated assets including the listed buildings at Penrhos and the Scheduled Ancient Monuments situated outside Cae Glas, including Trefignath Neolithic Burial Chamber (SAM An011). However, there are also numerous undesignated buildings and structures of significant historical or archaeological interest that require further assessment, evaluation and or mitigation. Recommendations are made within table 11.6 and include recording of Tre'r Gof Farm. It should be noted that the trial trenching recommended could result in a requirement for full excavation of this site.

In the light of the results of the assessment report and in accordance with national planning guidance (Planning Policy Wales 2012), Welsh Office Circular 60/96 (Planning and the Historic Environment: Archaeology) and Welsh Office Circular 61/96 (Planning and the Historic Environment: Historic Buildings and Conservation Areas) paragraphs 82 & 83, it is recommended that, should planning consent be granted, the planning authority should require that appropriate archaeological mitigation is undertaken prior to and during the proposed development. In order to secure such recording, it is recommended that a planning condition is attached.

Below ground archaeological remains - The Parc Cybi site lies adjacent to the Cae Glas development area and close to the Kingsland area. The archaeological excavations undertaken in advance of the Parc Cybi development revealed some of the most extensive archaeological remains ever excavated in North West Wales. The remains dated from all periods since the last Ice Age and included a Neolithic House and a Bronze Age Multi Cist Barrow, both of which have never been previously discovered on Anglesey, along with a significant late prehistoric settlement site, Roman settlement, medieval cemetery and other important remains.

The pre application evaluation of the adjacent Parc Cybi site sampled a very small percentage of the total

development area (approximately 1%) and consequently left the developer exposed to significant archaeological risk. The evaluation undertaken so far in relation to this application samples a much smaller percentage (less than 1%) of the development area and therefore means that the risk of encountering significant or extensive archaeological remains or deposits is high.

The archaeological evaluation has identified a later prehistoric settlement site within the Kingsland development area. The significance of this site is not fully understood, although if well preserved this could be a site of at least regional if not national importance. The extent of this site is not fully understood and other associated remains are likely in the wider landscape. This site can only be mitigated by either preservation in situ or large scale archaeological excavation.

The archaeological evaluation identified a potential Roman road within the Cae Glas development area along with numerous burnt mounds, probably dating to the later prehistoric or more specifically the Bronze Age. Further Roman sites may be discovered associated with the road and there is high potential for other prehistoric remains to survive across the site. Further evaluation is required to fully understand the remains and develop appropriate mitigation.

The evaluation of the Penrhos development area identified numerous early field boundaries and the potential for well-preserved deposits. As such a small proportion of this area was evaluated the archaeological potential remains unknown. Further intrusive work will be required to develop appropriate mitigation recommendations.

Additional archaeological issues - The impact of the proposals is not confined to the development areas since the below ground impact of drainage, landscaping or tree planting can be equal to, or even greater than, that of the development itself. The archaeological potential within the landscaping and tree planting areas has been subject to some geophysical survey and limited intrusive evaluation trenching. These areas therefore require further archaeological assessment in order to devise an appropriate archaeological mitigation strategy.

In response to these archaeological concerns GMS Consulting has prepared a Statement of Intent to accompany the planning application (June 2013). The purpose of this document is to set out an indicative timetable that will allow the developer to undertake a program of archaeological work in a phased manner prior to development.

**Leisure Department** Have confirmed that there are no current plans for developing either FF11 in the Ynys Mon Local Plan or FF6 in the Stopped UDP. A changing influx of workers / families / residents on the Cae Glas and Kingsland sites will change the local population dynamics and will alter/increase the demand for leisure services and facilities as per the report prepared by the council's EDU and mitigation is required.

**Building Control:** No formal response received.

**The Georgian Group:** We commend the level of information that has been provided especially in relation to the historic assets within the Penrhos site, although less is provided in respect of the other two sites. The Group is particularly interested in the Penrhos site due to the surviving buildings and structures associated with the estate, and welcomes the intention to retain and integrate them into the scheme. We still however remain Concerned that these schemes are being considered in outline form since the development will affect both the fabric and setting of the historic buildings and structures.

The Building Heights plan is helpful but we note that in the former walled gardens, the plan shows that the height of the buildings could be up to 8m. We consider that the height of buildings in this area should be limited to single storey or possibly 1.5 storey which would still allow for the estate cottages.

**Built Environment Section –**

**Conservation Officer:**

Following submitted following submission regulation 19:

With reference to the above, my previous consultations giving listed building and built conservation advice and guidance and following our recent site visits on the 13th and 20th June, 2013 and the submission of additional information I should now wish to provide you with my observations and comments as follows;

1. I continue to be in principal generally supportive of this application which seeks to breathe new life back into the Penrhos Estate.

2. I am now satisfied with the work Purcell have done in mapping out all the statutory protected listed buildings, any and all objects and structures fixed to the listed buildings and any and all objects and structures, although not fixed to the LBs but instead forms part of the land and has done so since before July 1, 1948, while in addition they have identified other non-protected but nevertheless historic associated objects and structure for our consideration. This information is clearly critical for one's knowledge and understanding of what is important to protect and respect while at the same time important to assess what impacts the proposed developments might have on the protection's settings their characters and appearances.

3. Possible one of the greatest impacts on the protected building, structures and their settings is the proposed "Hub" development. Since the protected mapping has been provided further consideration will need to be given to the design and integration of the Hub and its environs. From the information provided in the DAS the Hub building will need to seek and obtain LBC irrespective of being new build.

4. The Bailiffs Tower walls attached outbuildings and the Barn and Cart shed will be listed building conversions requiring sensitive conversion externally and internally. Their settings follow the proposed estate courtyard principals so proposed materials and finishes are paramount to respecting the character and appearance of those building.

5. With regards to the proposed Spa and Manor House and the impact they will have on the protected buildings, structures and their settings I should opinion that the devil will be in the detail, which is obviously not the concern of this application. However, the approach and methodology for conversion and conservation of the listed buildings functional and ruinous as proposed is following a clear and proven good practice track record and as such I am supportive of this approach which will also need to seek and obtain LBC as a refurbishment.

6. With regard to the proposed Estate and Kitchen Garden Cottages and the impact they will have on the protected buildings, structures and their settings again the devil will be in the detail but the detail is more than the proposed lodges it is also about the layout and their scale and their massing. Those proposed abutting the kitchen garden walls will need to seek and obtain LBC while the design principals do appear to be appropriate and fit for purpose. I am more concerned with the impact that those defined as proposed estate cottages in the centre of the Courtyard will have on the setting of the listed buildings, and structures. Their massing may need to be reduced to achieve a more sympathetic solution, not sure page 31 does this (DAS). The proposed layout plan for the Kitchen Garden Cottages on page 99 does not relate to the sketch concept shown on page 101. Having established that the plinth walls of a former glass house and associated building are curtilage object and structures associated with LB 5768 then the proposed layout plan needs to show their retention and possible conversion (page 7 suggests their ruins to remain within the scheme) (Appendix A) while page 30 gives a different layout? The map and key on the same page identifies the existing Well but other than stating ruins to remain within the scheme the proposal is not elaborated on. I am of the opinion that the historic Well in the former walled Kitchen Gardens could not be considered as a curtilage object or structure associated with the Listed Water Tower due to the fact that on the date of listing 22/2/93 its purpose and function had ceased to exist. However, I would suggest that it should be recorded as an important non-protected historic object or structure which will require very careful planning how it can be integrated into the proposed Kitchen Garden development.

7. With regard to the Listed Betting Stand and its setting I would advise that a visual link is important to be maintained with the area of land for which its purpose was intended i.e. Penrhyn Quillet. Therefore the layout of the proposed Quillet Lodges will need to take this into account as well as the issue of trees in this vista. Perhaps an area vista plan can be produced for approval.

8. With regards to the other non-protected historic structures I should wish to comment as follows.

8.1 The Boathouse is an important Penrhos Estate ruin and while much of the stone rubble masonry plinth has survived the original timber superstructure over the plinth has gone. From a historic conservation perspective finding a use and integrating what has survived into the holistic development is important. The current proposal appears slightly contentious in an extremely exposed and sensitive location in the AONB. Perhaps design can be modified to mitigate its visual impact while consolidating and adapting the ruin into a new building/object/structure.

8.2 The Bathing House is also a historic non-protected building forming part of the Penrhos Estate. What

you can see today bears no resemblance of the original Bathing House which would have been much smaller and of a design and character fit for purpose. The proposal would do one positive; replace an ugly building in this highly sensitive location. However, as the sketch of the proposed replacement indicates it either needs to be a very high quality landmark building or its design is such that it blends into the landscape.

8.3 Arthur's Seat is another however, this area is to be retained as public open space which is given a respectable buffer in terms of proposed development and the proposed Quillet Lodges are some distance away.

8.4 The Pump House and Beddmanarch do not appear to be affected by the proposed development other than by their proposed refurbishment.

8.5 The Gardeners Cottage does not appear to be directly affected by the proposed development, however the potential impact of the Estate Cottages proposed in the southern wall garden will need to be taken into account.

8.6 The Ha-ha circumnavigating the Quillet and identified stone boundary walls and garden features will all need to be taken into account in the big scheme in a conservation management plan which I will be recommending should the scheme move to the detailed application.

8.7 Finally Penrhos Lodge is identified on many early Estate maps and plans so from a historic building conservation perspective regardless of its status is an important Penrhos Estate Building retaining its original identity and function. From a building conservation perspective it would be of real benefit to refurbish and reinstate the original Penrhos Lodges and gates.

9. In summary I am still in principal, generally supportive of this application. Having now had the comprehensive benefit of the mapping of all the statutory and none statutory protected buildings, objects and structures and my understanding of how they may be affected by the proposed development it will be of paramount importance that a historic buildings Conservation Management Plan be produced prior to the submission of a formal detailed planning application and the numerous Listed Building Consent (LBC) applications required so perhaps it's best if you can consider this as a reserve matter/planning condition.

#### **Tree Officer:**

#### **Penrhos**

The indicative layout as defined in the parameter plan would result in c.25% loss of the total woodland cover in Penrhos. Much of this is of a higher value 'A' category woodland with a smaller proportion of it woodland protected by a TPO as detailed in table 1 above. Much of the category 'A' Woodland appears to be regenerated sycamore and not part of a formal planting scheme. Tree losses in Penrhos, as the report states, would not be replaced in the medium-term and the success of long-term replacement within Penrhos is limited by the conditions on the headland site. It is possible that new woodland would be more diverse in the long-term, but would be of a different character.

There is scope to retain significant historic trees within the affected areas subject to a detailed layout based on the recommendations of a BS 5837:2010 Trees in relation to Design Demolition and Construction – Recommendations survey. Extensive Arboricultural Method Statements would also have to accompany such a survey based on the notional methodologies and strategies contained in the ES.

The proposed lodges in the Quillet do have scope to retain some of the existing trees due to the age of the plantation. Where lost, trees could be more easily replaced within the shorter-term.

The main TPO areas affected are parts of W3 and W4. The total area of TPO affected in comparison with the total area is not considered to be significant with inwards views unchanged by the development proposed within the TPO.

The loss in accessible TPO woodland (as opposed to visible) is of significance, with the area accessible reduced by 50%. While management can improve the quality of the woodland and access and features therein, there would be very limited (proposed 0.6 ha) new publically accessible woodland within Penrhos. Management may also require thinning and replanting within the woodland compartments.

## **Cae Glas**

The potential loss of trees and woodland are of lesser significance on this site; the existing woodland resource is of poorer quality and there are large open areas within the site that require no tree removals to facilitate the development. Substantial areas of buffer are retained and there is scope for new boundary and internal planting, restructuring, linking and improving the diversity of the woodlands particularly on the interior.

Any layout would be based on a further BS 5837:2010 Trees in relation to Design Demolition and Construction – Recommendations survey. Extensive Arboricultural Method Statements would also have to accompany such a survey based on the notional methodologies and strategies contained in the ES.

Improved public access to the proposed Nature Reserve would result in significant public amenity gains but without greater clarity on the likely arrangements for access, it can be considered as a possible enhancement rather than mitigation for accessible woodlands elsewhere.

As with Penrhos, management of woodland not directly affected by the development may require targeted thinning, felling and replanting within the woodland.

New woodland planting should be possible as proposed, subject to constraints of underlying topography. The new planting here is proposed as mitigation for losses at Penrhos.

The proposal indicates that replacement woodland planting is attainable by area considering the sites in combination. Within the Penrhos site new planting will be limited and over a long timeframe. Losses to the Tree Preservation Order are limited, and the trees will continue to provide an important screen to existing development on the site and screen new development. At points the effects on the public amenity value of the TPO woodland will be greater e.g. from the coastal footpath where the buffer is weakened by the proposed development, and from retained internal routes bordering the proposed development. New planting at Kingsland would further mitigate losses.

## **Landscape Comments**

Initially the Landscape Officer made a number of recommendations in relation to the originally submitted proposals. These included the provision of additional information, changes to the assessment, the scheme and proposals, further mitigation notably in relation to the AONB,

Notable changes requested included a reduction in the height of the lodges on the Penrhos headland to reduce the potential adverse impacts in this sensitive area close to the coastal footpath. It was also recommended that further work was undertaken in relation to the cumulative impacts of the development.

In final comments it was noted that the three sites Penrhos, Cae Glas and Kingsland are within the AONB and within Landscape Character Areas 1 and 3 of the Anglesey Landscape Strategy Update 2011.

The LVIA considers the potential effects of the proposed development on the landscape character of the sites and surrounding area and the visual impact of the proposals through the identification of sensitive visual receptors and key viewpoint locations.

The LVIA assessment has been carried out with reference to the Guidelines for Landscape & Visual Impact Assessment 2nd edition 2002. The assessment includes desk based analysis and on site field study / observation.

## **Landscape Assessment**

Ch 9. Refers to landscape receptors i.e. the physical landscape that may be directly affected by the development including the predicted magnitude of change to:-

Key Landscape Elements include trees, woodland, hedgerows, heathland, landform topography, coastline, built elements e.g. stone walls, remnants of the historic Penrhos Estate, footpaths and public open space and agricultural land.

Tree Cover refers to trees adding landscape character to the setting of the historic buildings at Penrhos and the existence of a TPO on part of the woodland at Penrhos and the need to retain woodland edges to maintain character and screening. It is imperative that a significant depth of woodland edge / screen planting

is retained to maintain character / safeguard screening at the Penrhos site and that this woodland screen is protected by a preservation order and management plan for mitigation purposes.

It is unlikely that the area of green wedge that will be lost to the proposed development at Cae Glas will have a significant impact on the remaining main part of the green wedge between Trearddur Bay and Holyhead / Ty Mawr employment site. See further comment below

### **Additional Analysis On Potential Impact On Green Wedge**

A significant part of the green wedge which is in the ownership of the applicant will be retained and maintained as mixed and coniferous woodland (to the south and east ) and managed heathland (to the west) thus retaining its designation as a buffer for local communities.

Some agricultural land to the north eastern boundary of the green wedge abutting the A55 will be lost to development, but a large strip of the green wedge (approx. 785m in width ) will be retained between Tre Gof Farm at the western edge of Cae Glas (built proposal) and Trearddur Road. There are also proposals for advanced planting in this area to enhance and reinforce this part of the buffer.

One of the narrowest parts of the green wedge is between Penrhyn Geiriol and the Ty Mawr / Parc Cybi site which is only some 120m in width, the remaining buffer between the Cae Glas proposal and Trearddur will be much greater than this at approximately 785m. Therefore it is unlikely that the green wedge will be significantly affected by the proposal at Cae Glas as a large part of the existing green wedge will be retained and maintained as a buffer and the addition of advanced planting will also enhance the screening and biodiversity of this area.

The main area of the Cae Glas development will be concentrated in the north eastern part of the green wedge next to the A55 and will be of an appropriate design to its context i.e. (industrial landscape of Anglesey Aluminium and A55 corridor to the north, Trearddur to the west and part of the inland sea to the south and east). The proposal includes new woodland planting and water bodies to enhance the setting of the built development and will better integrate with the existing woodland to the north-west, south and south-eastern parts of the green wedge.

### **Undeveloped Coast**

#### **Mitigation**

Mitigation & Enhancement Measures are considered and illustrated. New areas of advanced planting for screening / mitigation purposes have been clearly shown on all 3 sites. At Penrhos a significant area of advanced planting will be allowed to establish as mitigation before the development of any headland lodges to help safeguard part of the open agricultural character of the headland and this sensitive part of the AONB. There are similar advanced planting mitigation proposals for Kingsland and Cae Glas.

#### **Building Design**

The headland lodges have been designed to appear embedded in the landscape and that the design, orientation and positioning of the lodges on the headland have been carefully considered using natural materials to reduce potential impacts. The lodges closest to the coast will be lower in height as shown to help reduce the potential adverse impacts in this sensitive area close to the coastal footpath.

The lodges within the woodland will be guided by a detailed tree survey to minimise impacts on trees of value and will be guided by BS 5837 in order to retain an acceptable level of tree cover for both mitigation and amenity purposes.

#### **Landscape Proposals**

Refers to reinstatement of formal gardens, landscape settings, increased diversity of plant species, biodiversity, management of woodlands, retention of agricultural land along the coastal edge, advanced planting on the headland prior to the development of lodges to this part of the site to provide visual screening. It also refers to the light touch approach to access woodland lodges to minimise impacts and significant new woodland planting for screening and habitat creation.

#### **Penrhos**

1. AONB - I believe this impact would be highly adverse in part (Headland) in the short term reducing to moderate in the long term following establishment of mitigation measures.
2. Landscape Character – slight adverse to neutral following mitigation
3. Seascape Character – negligible.
4. Footpaths cycleways – neutral.
5. Topography – negligible.
6. Trees – minor adverse.
7. Landscape features of value – moderately beneficial.

## **Summary**

The proposals will have impacts on all three sites some of which will be adverse and some beneficial. From the findings of the assessment it is clear that all 3 sites within the AONB will experience adverse landscape and visual impacts in the first 3 to 8 years of development. Over 10+ years some of these impacts are likely to reduce as planting / mitigation matures.

The council's Landscape Officer goes on to explain that following further discussions on mitigation the revised plans now propose cabins and units being sited in less sensitive locations and the addition of further extensive internal landscaping to help break up the development. These further changes will provide a more varied landscape to help integrate the three sites within their sensitive settings and specific location within the AONB.

## **Additional Comments On Undeveloped Coast**

The design, height, orientation and layout of the headland lodges have evolved and changed following extensive discussions and meetings with the developer. The current revised plans have considered further mitigation and propose a reduction in height to those lodges closest to the headland, orientation has changed to reduce visual impact from the coastal path, the layout includes additional advanced planting in strategic locations and a retention and appropriate management of a significant part of the open character of the headland. As a result of these additional mitigation proposals the long term impact on this part of the AONB is unlikely to be significant.

## **Countryside and AONB Officer - General Comments**

- Major development(s) within a significant area of Anglesey's AONB. Reference PPW 5.5.6 – Is the policy test robust and comprehensive enough for the individual and collective sites.
- More detail / information / methodology required on the mitigation (3 sites) of how the potential adverse impacts within a large and substantial scale development in the AONB are addressed.

Comments made on the environmental statement, notably in terms of the statutory status of the AONB Management Plan, Special Qualities of the AONB listed in page 21 Table 7 of the AONB Management Plan.

In further comments again pointed to the national policy tests on large scale development in the AONB and the robustness of the assessment of alternative sites. Confirmed that the matters raised in the previous consultation had been satisfactorily addressed in the resubmissions.

**Pahdi HSE:** Does not advise against the development.

## **Ecological and Environmental Adviser**

In relation to the initial consultation expressed concern at the overall loss of woodland in an area and requested some more native woodland creation in appropriate area(s), but not at the expense of heathland which is habitat for reptiles.

Advised that Table 10.10 in the submission should include figures on mitigation of habitats so that the overall effects can be better evaluated. Also noted that this table is contradicted by the note at page 10 – 42 (in



Table 10.12). The former table shows a 0.29 ha loss of reed bed, with no gains at Cae Glas or Kingsland, whilst the latter table states 'replacement reed bed at Cae Glas and Kingsland will ensure no net loss'. Requested that this point was clarified and indicated that there should be no net loss of reed beds.

As regards the master plans in relation to Phase 1 Habitat Survey at the Kingsland site requested details of management, for example, to show how heathland areas are to be enhanced. Also suggested that some marshy grassland should be retained. The retention of the Western area with wetland and heathland and tree planting on southern edge was welcomed.

On the Penrhos site it was suggested that new planting should include species found locally, from the North West of the United Kingdom such as Rowan, birch, hawthorn, elder, holly.

Clarification was requested on whether the area marked semi-natural broad-leaved woodland to SE of visitor centre is to be lost on Cae Glas and sought more details on the proposed nature reserve. It was noted that the proposed cricket pitch would take up a small area of marshy grassland.

In relation to reptiles it was advised that reasonable efforts should be made to avoid translocation where possible, through changing the design, layout and/ or changing the methodology as appropriate. As with other species surveys, the recommended actions require further work, for example formulating RAMs (reasonable avoidance measures).

Connected with the earlier comments about wishing to see less woodland loss, a list of sites was requested where there are different conservation options so that decisions could be aided by information on factors such as existing habitat, records status of species in law etc. This would also help ensure that the best use is made of the opportunities in the proposal area.

Lichen and hare surveys were also requested.

In summary conclusion, a number of issues have been raised above which need addressing. Whilst there are many good points relating to the ecological side of the proposal, it was considered that this could be improved further. The biggest loss is the local impact on woodlands, but there is also an opportunity to create more natural native woodlands which will in the long-term have a high wildlife value to make up for this.

Following the submission of the amended proposal including the additional information and amended plans. It was confirmed that the changes to chapter 10 of the Environmental Statement were basically acceptable, and that the approaches noted should be followed according to their nature in relation to for instance the management clause.

The revised consideration of potential effects on Ynys Cybi SAC features (sections 10.44-10.51) is considered acceptable and indicates that there will be no significant impact on SAC, but a final position is reserved until comments are received from Natural Resources Wales "NRW" who have specialist advisory responsibility for N2K sites under the Habitats Regulations (2010).

In relation to Appendix H Construction Method Statement for Protection of Biodiversity Features it is advised that the approach outlined should be followed but modified at 2.16 (first bullet) and should cover October-March inclusive to ensure effectiveness of this measure. Further it was noted that badgers will be covered under the recommendations from the 2012 Badger Assessment.

In relation to Appendix I – Section 42 NERC Act 2006 - Habitats And Species Conservation Priorities And Management it was advised that the conservation priorities noted (in last column) be carried out for the three sites. In the case of the Kingsland site, it is advised that special consideration be given to need to safeguard the approach into the long-term because of the potential for further development pressure due to the site being proposed for residential use.

Following the earlier request a Lichen Survey was submitted as Appendix G. The survey did not find any species of particular conservation importance (see Section 5). The recommendations (Section 6) give a number of options for long-term management, but it is also clear that in some areas lichens will thrive without intervention. It is advised that, given the modest specific lichen interest of the site and number of other management considerations being proposed, consideration be given to lichens in management at a level proportional to their importance.

In relation to the hare survey that was previously requested the Ecological and Environmental Adviser is satisfied that the issue is given an appropriate level of attention and given that hares as a species do not

carry the same weight as protected species it is no longer considered that a hare survey is required.

In terms of the amended proposals which now include demolitions this may have implications for protected species, the relevant survey, mitigation and (if applicable) licences may need to be obtained, as appropriate. Potential for bats in any of the buildings to be demolished should be addressed and confirmation that bat surveys have been undertaken should be provided.

**Scottish Power:** Have indicated their apparatus in relation to all three sites.

**MOD Safeguarding and Byelaws:** No safeguarding objections.

**North Wales Wildlife Trust:** Have raised an objection to the application within an Area of Outstanding Natural Beauty and are particularly concerned that the application has been presented in outline form which lacks details. The Trust have stated that the detailed comments are mostly associated with the policy setting for the application.

In further comments they recommend that the Council refuses planning permission for this application in its current form.

General following points made:

- i) We are concerned that the application is still in outline form and that as such all proposals could be subject to change without wide consultation with stakeholders
- ii) We remain concerned about the potential impact on the AONB and adherence to national guidance (PPW5) relating to it.
- iii) The most recent version of Planning Policy Wales provides sufficient grounds to support refusal of this application.
- iv) We wish to highlight that the Penrhos area in particular is already a valued environmental resource for Anglesey providing opportunities for a range of activities benefiting the health and social well-being of many thousands of people.
- v) We recommend that the any further consideration of the development is as separate planning applications for the three identified areas.
- vi) We are concerned that our comments made on the earlier application have yet to be addressed.

Detailed comments are also made in respect of the following aspects of the submission: Sustainability not proved; prematurity; suggested that there are sufficient grounds to refuse planning permission; more information requested in terms of how such a large development moves towards a low carbon economy, impact on bio-diversity, question the economic premise of the development as it is a single large scale, landscape changing development considered a more appropriate way would be heritage lottery y funding a high quality nodes at key locations, concern at outline form, not convinced by the need for the housing, loss woodland, disturbance not address concerns SSSI in terms increased pressure, consultation required on mitigation and planning conditions, lack detail impact SAC, failure to acknowledge weight of opinion against the proposal; no attempt to determine the invertebrate interest; wish to comment method statement European Protected Species, Welcome Draft Construction Method Statement but note it is based on Reasonable Avoidance Measures, serious gap in biodiversity interest in the area, issues as regarding planting species and the effects on red squirrels, discrepancies in the DAS

**The Society for the Protection of Ancient Buildings:** The Society continues to have reservations about this scheme being considered in outline form because of the listed buildings and structures within the Penrhos site and also the designated and undesignated historic assets within the other two sites. The applicant has however provided a significant amount of information in support of the application and we note and welcome the intention to retain the historic assets within the Penrhos site and integrating them into the overall scheme. There is however less information about the historic features within the other two sites and how they will be treated.

In terms of the historic buildings and structures within the Penrhos site we hope that speculative restoration will be avoided and we are pleased to note that the Design and Access Statement refers to some areas being conserved 'as is'. The concept drawings and plans indicate that the proposed development may be capable of integrating sympathetically with the existing historic buildings and structures, but we are concerned that because all matters are reserved apart from the access, the concept may become 'watered down' further along the process.

If outline consent is granted, we look forward in the future to being consulted on the full planning application and the application for listed building consent.

**Network Rail:** Have stated that whilst the proposal will not affect any level crossings in the area, there are concerns that the proposal will increase the risk of trespass upon the operational railway, and have made recommendations regarding this and works situated close to network rails land.

In the re-consultation Network Rail stated that from a desktop study it appears this proposal poses limited risk to Network Rail's (the company) land and infrastructure however a number of matters are listed which could affect the railway line and the applicant is advised to contact Network Rail to mitigate these risks.

**Royal Society for the Protection of Birds (RSPB):** The RSPB do not consider that the Local Planning Authority should determine the application separately from all or any of the reserved matters, as it is not possible to assess the likely significant adverse impacts of the scheme as a whole based on limited information.

**Red Squirrel:** Society Red squirrels are present throughout Cae Glas and there is evidence that the species is present in Penrhos. Comments made as regard the composition of an tree re-planting and the impacts of canopy fragmentation. Mitigation for the impact of disturbance of red squirrels during construction phase needs to be outlined in more detail.

**Secure by Design:** No formal response received.

**Drainage Section:** Welsh Water should be consulted as the area is in an area served by a public sewer.

The applicant would need to obtain the consent of the Environment Agency for the proposed surface water discharges.

In relation to the re-consultation it is noted that the drainage details contained in the previously submitted flood consequences assessment should be considered as part of the revised hybrid application.

No specific drainage details have been submitted for the foul drainage systems intended to serve the development sites. Confirmation should be provided that acceptable connection points to the public sewerage system have been agreed with Welsh Water and indicative layouts provided for the on-site sewage system.

Detailed design and construction details for the foul and surface water drainage systems will need to be submitted with any full planning application.

**The Victorian Society:** No formal response received.

**Welsh Government (Transport)** – As highway authority for the A55 trunk road directs that any permission granted includes the following condition:

1. Prior to use of Cae Glas as workers accommodation associated with any proposed works at Wylfa Nuclear power station, full details of the forecast trip generation and mitigation of the impact on the trunk road network shall be submitted to an approved in writing by the highway authority in writing.

In further comments requested that an assessment of nuclear workwrs in cae glas and Kingsland and holiday use at Pernhos is undertaken prior to the impelmenattion fo the use. Also requested that the reference to Green Travel Plan is changed to Transport Implementation Strategy (TIS).

#### **Welsh Government (Natural Environment and Agriculture Team)**

**Cae Glas & Kingsland:** Both sites are shown on the Provisional (1:250 000) scale Agricultural Land Classification "ALC" map as being as Urban to the north and ALC Grade 4 to the south. This map was published in 1977 and is the only available map showing ALC at a strategic level for all of Wales. Please note the purpose of the provisional map is to provide broad-brush ALC, appropriate for strategic land use assessment. Additional and more detailed survey work according to the Revised guidelines and criteria for grading the quality of agricultural land (MAFF 1988) is needed where site specific ALC is required. There is no record of any site specific ALC survey for either site.

The mapped soil type for both sites is the East Keswick 1 Association. This soil type is inherently freely drained but can be stony. In addition, rock outcrops can be locally common on Ynys Mon. Both sites (especially Cae Glas) show clear evidence of rock outcrops which present a severe agricultural limitation. Even if not visible on the surface, rock can occur at quite shallow depth in the soil.

The Cae Glas site appears in non-intensive agricultural use and significant areas are in non-agricultural use (e.g. scrub). The Kingsland site is potentially of higher agricultural potential than Cae Glas. However, the likelihood of Best and Most Versatile (BMV) land occurring is low.

Both sites are shown as agriculturally Less Favoured Area (LFA), Disadvantaged Area (DA), reflecting the poor agricultural quality in the area.

**Property Section:** No observations.

**Minerals and Waste Officer:** Pointed out that there is a sand and gravel allocation forming part of the Stopped UDP on the Penrhos site but no objection raised on the basis of viability information on extracting the resource submitted as part of the application.

**Welsh Language Society:** Object to the proposal on the following grounds:

The Welsh Language Society is against the above application because of Anglesey's vulnerable linguistic nature which was evident in the 2011 Census, to permit an application of this type would be detrimental to the Welsh language and the application is premature as there are no firm plans in place for Wylfa B.

In further comments on the planning application they state that the construction of a Leisure village at Penrhos Coastal Park is going to have a negative impact on the local community, economy and Welsh language. The Welsh Language Society's viewpoint is that the impact on the Welsh language is a primary concern. It is important to recognize that the Village is being used as a place to settle workers during the construction phase of Wylfa B, although there are no definite plans if Wylfa B will be built or not. Put simply, if there are no plans to develop Wylfa B, will the village be constructed?

The proposals entail building a new central building for Farmers Market to ensure that quality local products are being sold on the Island, it is important that people support local Welsh produce to ensure prosperity through local companies that are able to provide work in the area. We are supportive of the need for a farmers market of this type in the area, but believe it cannot be part of a development of this type.

We firmly believe that if the plans of the village proceed, a highly negative impact on the Welsh language, mainly because Wylfa B workers will come from outside Wales so they would not be able to speak Welsh, and it is unlikely they would go about learning the language, and realise that the language is important in Wales, especially in Anglesey where over half of the population speak Welsh. While there are a number of schemes to recognise the Welsh and for local communities to benefit from the village, it is a concern that this will not continue mainly because in order to build Wylfa B will be the workers will live in the Village for fifteen years, therefore settling on the island. There are many things to consider with the employees, which schools will the employee's children attend? Will there be enough room in the schools for all the children of the workers? Even if there is a place, the language spoken by the school children will be English because the workers community will be English. What impact is this going to have on the Welsh language? Communities in Anglesey will suffer because the employee anglicise the area. After fifteen years of living on the Island, the workers are not going to move back to their previous homes so it is imperative that the council ensures that the employees respect and realise that the language is an essential part of society on Anglesey. In addition to the impact on the Welsh language what about the pressure on the local health service? Everyone is aware that the Welsh health service is under pressure already, there will be hundreds of workers Wylfa B will have a significant impact on the service here.

When Wylfa B has been completed, if the plans continue, it will become a tourist village which may contribute significantly to the Island's economy, however, people are becoming increasingly aware of the impact of nuclear and people's understanding has grown, will people want to holiday in Anglesey with a nuclear plant there? Nuclear has had an adverse impact several times, people will be concerned about the impact of Wylfa B and probably decide to go on holiday elsewhere.

**Rural Housing Enabler:** The residential development proposal should not be considered in isolation with from the workers / holiday provision.

**British Gas Transco:** No formal response received.

**CADW:** Have provided comments on the application on aspects which fall within CADW's remit as consultees on planning applications which is the impact of development on scheduled monuments or registered Historic Landscapes, Gardens and Parks.

**Coastal Footpaths Officer:** A section of coastal footpath encircles the site at Penrhos Coastal Park. We are keen that the coastal Path is unaffected by the development and that the route would be kept available whilst any works progress, should the application be approved. I would advise the applicant to work in conjunction with the Coastal Path Team and that consultations are continued as the application progresses.

**Ramblers Association:** No real problems with this development in principle but I would hope the developers would respect the wishes of the walking public and allow them to have the same access they have enjoyed in previous years.

**Sustran:** The acknowledgement of the National Cycle Network routes and other walking and cycling routes in the area is noted. The current coastal route around the Penrhos Headland is part of a local walking and cycle route known as Lon Las Penrhos which follows the line of the coastal path. Shared use of walking and cycling access around this route in the future should be provided so as to provide a circular walking and cycling route when linked with the current alignment of the National Cycle Network. This would provide an excellent circular route when linked in with the other traffic free paths that connect to the site from Holyhead and Valley. This option would also enhance the visitor opportunity and extended opportunities for disabled cycle access.

A shared use link to Cae Glas should also be provided to enhance a mini network of routes in this area.

Routes through Cae Glas should be opened up for cycling and pedestrian access. These links should be extended through to the Lon Towyn Capel/Lon Trefignath minor road so as to provide increased access to Treaddur Bay at the south east end and to the Plas Cybi site its links back to Holyhead, at the north east access.

Consideration should be made to create at least one shared use walking and cycling nature trail within the education facility or nature reserve. This would enhance the visitor opportunity and also provide opportunities for disabled cycle access and education.

The Kingsland development must be designed to the guidance provided within Manual for Streets and be fully permeable for pedestrians and cyclists. Links to the local walking and cycling network should be provided as part of this phase of the development as well as proposals that may arise from the above. Pedestrian and cycle access should be provided at the football ground/leisure centre access at the connection to MILL Road.

Sustrans believe that the inclusion of the above will assist in the delivery of a local walking and cycling network for this part of the Island which will be a major benefit to the local communities and visitors to the area.

In relation to the information provided in the re-consultation in principle, Sustrans supports a number of the proposals to provide improved public access to and through the development sites and the commitment by the developer to make the sites as accessible to sustainable modes of transport as possible is noted.

Whilst statements such as 'as part of the development proposals the cycle route through the site will be improved and realigned' are noted, it is the key details behind these designs that matter. Sustrans would be happy to work with both the council and the developer on these detailed designs. We would especially like to see how the pedestrian and cycle access is dealt with along the Principle Vehicular Route within the Penrhos development.

Penrhos and Cae Glas seem to have enhanced pedestrian and cycle access through the sites but the Kingsland proposal only has pedestrian access. The improved access provision to Mill Road should be developed to a shared use standard.

**Sports Council for Wales:** Requested confirmation that the new facilities to replace the existing football and cricket pitch are of the same size as the existing pitches therefore providing the same opportunities for training and matches.

## **Welsh Water:**

Sewerage: Have explained that the development will overload the existing public sewerage system. No improvements are planned within Welsh Water's capital investment programme. We consider any development prior to improvements being undertaken to be premature and therefore object to the development. The reason for the objection is to prevent hydraulic overloading of the public sewerage system, to protect the health and safety of existing residents and ensure no detriment to the environment.

During the discussions with the applicant's consultants two options were outlined:

- Connection to the existing network adjacent to the sites subject to upgrading of the existing network.
- Direct connection to the Waste Water Treatment Works via a terminal pumping station.

To progress either option a hydraulic modelling assessment will need to be undertaken.

We understand that this proposal is an outline application submitted to establish the premise of the development and should you be minded to grant planning consent for the above development without this work having been completed two conditions are suggested, in addition to other drainage conditions.

Additionally unrecorded public sewers and lateral drains may cross the Penrhos site, a 300mm public sewer crosses the Cae Glas site and no part of the building should be within 5 meters of the centreline of this public sewer.

The proposed development is in an area where there are Welsh Water's supply problems for which no improvements are planned within Welsh Water's current Capital Investment Programme amp 5 (2010-2015). Any increased demand will exacerbate the situation and adversely affect the service to existing customers. Welsh Water therefore object to the development. It may be possible for the developer to fund the accelerated provision of essential improvements by way of a formal requisition under section 40-41 of the Water Industry Act 1991. A hydraulic assessment is required in the first instance.

If the local planning authority is minded to grant planning permission without the work having been carried out a condition is recommended.

All three sites are also crossed by water distribution mains and no development will be permitted within the specified distances of the centrelines of these apparatus.

In terms of sewer treatment Welsh Water indicate that no problems are envisaged with the Waste Water treatment of domestic charges from the site, however, if a new terminal pumping station is required a feasibility of the works will need to be undertaken.

**Betsi Cadwalader University Health Board** With reference to the proposed planning application attach an assessment of public health implications associated with the development. We have consulted our technical advisers within Public Health Wales as well as PHE CRCE-Wales, and our comments are based on the information contained within the application documentation.

Specifically the following recommendations are made:

- Dust prevention measures should be sufficient to prevent nuisance and exposure to PM10 at the most sensitive receptor, planning conditions should reflect this requirement.
- The air quality assessment made assumptions on the discharge stack parameters of the combined heat and power facility. When details of these plants are known, consideration should be given to repeating the modelling and assessment exercise to assess the impact of the plant.
- Noise levels generated from site activities should not give rise to annoyance to neighbouring business or residential properties.

**Tourism Partnership North Wales** Tourism Partnership North Wales supports the application, per above, as it is compliant with the second of four Strategic Objectives in Tourism Strategy North Wales 2010-2015, namely Investing in Product Excellence. One of the Key Priorities within this Strategic Objective is Providing Quality accommodation, with which this development proposal is compliant. This Key Priority aims to ensure there is a sufficient supply and range of quality accommodation to meet changing market's needs,

accommodate growth and support a thriving tourism economy. In this context, there are a number of holiday parks on the Isle of Anglesey, and across North Wales, but there are no holiday villages. The holiday parks are dominated by privately owned static caravans, and a small number of privately owned chalets. The proposed holiday village business model differs, as chalets will be corporately owned and let to holidaymakers. It is akin to the Center Parcs or Bluestone, Pembrokeshire product model. This development is therefore considered to be introducing a new product model to the Isle of Anglesey and to North Wales, and in effect growing the market, rather than displacing existing business. In the context of self-catering accommodation, the Strategy notes the development potential of additional quality accommodation from conversion of redundant farm buildings. This sector is dominated by small developments with limited servicing, in terms of on-site offer of food and leisure provision. Again the comprehensive on site food offer and leisure provision will in effect grow the market, rather than displace existing business. The existing business will remain positioned as independent providers, with an appeal to an independent holidaymaker. The situation developed at Bluestone, Pembrokeshire was of benefit to the independent self-catering accommodation in the area, the holiday village investment generated greater awareness of the area, and increased demand, and offered day visitor leisure and recreational facilities to those holidaying in the independent self-catering accommodation. The all year round operation at the Penrhos site will create a significant number of all year round jobs. The number of jobs, and scale of operation, will create a hierarchy of posts, up to supervisory, management and director levels. This contrasts with smaller developments, where jobs will be mostly operational. The range of services on site will demand specialist skills, in contrast with smaller developments where jobs will be generic. Without increase in accommodation capacity to replace dated accommodation, additional income will not be generated, nor will the objective to increase the dependence of the Isle of Anglesey on the visitor economy be achieved. The Land and Lakes project would be of national significance in terms of tourism development and promotion. It will contribute to the national objectives of Visit Wales' Tourism 2020, i.e. to grow tourism in Wales by 10%, between 2013 and 2020.

## **5. Relevant Planning History**

### **Penrhos**

46C427/SCR: Screening Opinion for the removal of the wall and erection of wooden steps on land at Penrhos Coastal Park, Holyhead. EIA not required – 20.04.06

46C427A: Application to lop, top and fell trees protected under tree preservation orders at Penrhos Coastal Park, Holyhead. Withdrawn – 18.08.06

46C427B/TPO: Application to prune trees which are protected under a Tree Preservation Order at Penrhos Coastal Park, Holyhead. Approved – 10.10.06

46C427C: Application for the erection of two height barriers at Penrhos Coastal Path, Holyhead. Approved – 14.12.06

46C427E/TPO: Application to remove trees which are protected under a Tree Preservation Order at Penrhos Coastal Park, Holyhead. Permission not required.

46C427F: Application for the change of use of land for the siting of a porta cabin to be used as changing facilities and the use of field as a sports ground together with formation of a gravel parking area on land at the former Sports Field, Penrhos Coastal Park, Holyhead. Approved – 24.07.08

46C427G/SCR: Application for screening opinion for two leisure villages and residential development at Penrhos Coastal Park, Holyhead. EIA required – 30.08.11

46C427H/SCO: Application for a scoping opinion for two leisure villages and residential development at Penrhos Coastal Park, Holyhead. Opinion issued – 08.03.12

46C427J/SCR: Application for screening opinion for two leisure villages and residential development at Penrhos Coastal Park, Holyhead. EIA Required – 08.11.12

46C124: Change of use of old toll house into a tea room together with the formation of a car park at Penrhos, Holyhead. Approved – 04.08.88

46C124A: Alterations and extensions to provide additional dining space and a kitchen at Toll House, Penrhos, Holyhead. Approved – 20.09.96

46C124B/LB: Listed building consent for alterations and extensions to provide additional dining space and kitchen at Toll House, Penrhos, Holyhead. Approved – 29.10.96

46C124C: Part-demolition of the existing building, alterations and extensions together with alterations to the existing access at Tolldy, Penrhos, Holyhead. Approved – 12.03.01

46C124D/LB: Listed Building Consent for the part-demolition of the existing building, alterations and extensions together with alterations to the existing access at Tolldy, Penrhos, Holyhead. Withdrawn – 02.02.11

46C287: Erection of a conservatory at Beddmanarch, Penrhos Farm Estate, Holyhead. Approved – 07.11.96

46C211: Felling of approximately 800 trees which are protected under a TPO on land at Penrhos Coastal Park, Holyhead. No objection – 10.04.91

46C211A: Erection of a new wooden bird hide for public use at Penrhos Coastal Park, Holyhead. Approved – 04.12.92

46C211B: Application for the consent to fell approximately 1500 trees protected under a TPO at Penrhos Coastal Park, Holyhead. Allowed - 05.05.93

46C94: Demolition of existing dwelling and construction of new dwelling at Ty Rhosydd, Penrhos Nature Reserve, Holyhead. Refused – 28.08.87

46C283: Restoration and refurbishment of the Water Tower, Penrhos Farm Estate, Holyhead. Approved – 11.06.96

46C283A/LB: Listed building consent for restoration and refurbishment of the Water Tower, Penrhos Farm Estate, Holyhead. Approved – 09.07.96

46C282: Alterations and extensions to the Bathing House, Penrhos Estate, Holyhead. Approved 08.05.96

46C97: Erection of a dwelling on Site of Sweet Briar, Penrhos / London Road, Holyhead. Refused - 28.08.87

46C23: Erection of a portal frame sheep shed and hay barn at Penrhos Farm, Holyhead. Approved - 14.12.84

46C23A: Conversion of farm buildings to provide facilities for M.S.C. workforce at Penrhos Farm, Holyhead. Approved – 04.08.88

46C23B: Retrospective application for the change of use of two former agricultural sheds to general storage use at Penrhos Farm, Penrhos Coastal Park, Holyhead. Approved – 11.05.07

46C334: Application to determine whether prior approval is required for the demolition of No. 2, Penrhos Farm Bungalow, Holyhead. Permitted Development – 16.11.00

46C71: Change of use of garage and storeroom into a dwelling at Penrhos, Holyhead. Approved – 21.05.86

46C71A: Conversion of redundant agricultural buildings into 3 dwellings at Penrhos Lodge Property, Penrhos Estate, Holyhead. Approved – 01.10.96

46C71B/LB: Listed building consent for conversion of redundant agricultural buildings into 3 dwellings at Penrhos Lodge Property, Penrhos Estate, Holyhead. Approved – 27.09.96

46C71C/LB: Listed building consent for alterations and extensions to The Tower, Penrhos, Holyhead. Approved – 11.12.96

46C71D: Alterations and extensions to The Tower, Penrhos, Holyhead. Approved – 08.11.96

46C71E: Erection of a conservatory at The Tower House, Penrhos Estate, Holyhead. Approved – 10.06.03

46C71F/LB: Listed Building Consent for the erection of a conservatory at The Tower House, Penrhos Estate, Holyhead. Approved – 26.06.03



46C301: Alterations and extensions to the property together with the erection of a private triple garage at Ty Ffarm Penrhos, Stad Penrhos, Caergybi. Approved – 04.12.97

46C333: Application to determine whether prior approval is required for the demolition of Ty Melyn, Penrhos Farm, Holyhead. Permitted Development – 16.11.00

### **Land adjoining Penrhos**

46C427D: Erection of a monumental stone & plaque to commemorate Thomas Telfords 250th anniversary at Stanley Embankment, Penrhos Coastal Park, Holyhead. Approved – 05.07.07

### **Kingsland**

46LPA531/DC Formation of a new access to O.S. enclosure no. 9969 on the B.4545 Kingsland Road, Holyhead. No objection – 07.07.8

## **6. Main Planning Considerations**

### **Environmental Impact Assessment (EIA)**

The planning application it is accompanied by an Environmental Statement. In accordance with the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 an assessment of whether the environmental information as a whole meets the requirements of these regulations and that sufficient information has been provided to assess the environmental impact of the application is required.

The ES includes a non-technical summary. It covers all the matters normally associated with large-scale leisure/tourism and housing development, it includes information on the impact of the workers accommodation development, and it addresses additional site-specific matters and sets out mitigation proposals. In addition a scoping opinion was issued by the local planning authority (46C427H/SCO) on 08.03.12 and the ES is considered to satisfactorily address the issues raised therein.

### **Development Plan and other relevant planning policies, advice and guidance**

Pursuant to the provisions of section 38(6) of the 2004 Act, if regard is to be had to the development plan for the purposes of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise. The development plan for Anglesey comprises the Gwynedd Structure Plan (approved November 1993) and the adopted Ynys Local Plan (adopted December 1996).

PPW advises that the recent changes to national planning policy have not changed the statutory status of the development plan as a starting point for decision making.

PPW at paragraph 2.7.1 advises that “Where development plan policies are outdated or superseded local planning authorities should give them decreasing weight in favour of other material considerations, such as national planning policy, in the determination of individual applications. This will ensure that decisions are based on policies which have been written with the objective of contributing to the achievement of sustainable development”.

The latest version of PPW reaffirms the role of the planning system in achieving sustainable development and paragraph 4.2.2 PPW advises that “the planning system provides for a presumption in favour of sustainable development to ensure that social, economic and environmental issues are balanced and integrated, at the same time, by the decision-taker.”

At paragraph 4.2.4 PPW advises that “where:

- there is no adopted development plan or
- relevant development plan policies are considered outdated or superseded or

- where there are no relevant policies

there is a presumption in favour of proposals in accordance with the key principles and key policy objectives of sustainable development in the planning system. In doing so, proposals should seek to balance and integrate these objectives to maximise sustainable development outcomes". Sections 4.3 and 4.4 of PPW set out the relevant principles and objectives.

PPW at paragraph 2.7.2 states that "it is for the decision-maker, in the first instance, to determine through review of the development plan whether policies in an adopted development plan are out of date or have been superseded by other material considerations for the purposes of making a decision on an individual planning application. This should be done in light of the presumption in favour of sustainable development." It is important to note that the Welsh Government guidance consistently refers to policies not development plans being outdated or superseded.

Material planning considerations include the Stopped Anglesey Unitary Development Plan (2005). On 1st December 2005 the County Council voted to implement the transitional arrangements set out in the LDP Wales regulations and to "stop work" on the Ynys Mon Unitary Development Plan "UDP". The deposit plan of 2001, as amended by the Inspector's report, remains a material planning consideration carrying weight commensurate to the stage it reached "Stopped UDP".

More recently the Council has adopted an Interim Planning Policy "IPP" to deal with large housing sites in or near the main centres of Amlwch, Holyhead and Llangefni.

Other material considerations include the Planning Policy Wales (PPW), Technical Advice Notes and other local policy documents (listed in the relevant section of this report).

### **Departure from the Development Plan**

As noted above, the proposal is for the development of Penrhos, Cae Glas and Kingsland. It is considered that the application represents a departure from the development plan in so far as the proposals relate to Cae Glas and Kingsland.

### **Cae Glas**

Policy 2 (New Jobs) of the Ynys Mon Local Plan states that the council will support job creating projects on sites allocated on the Proposals Map and detailed in Proposals S1 to S35 where they accord with the criteria in policy 1. Proposal S1 (Ty Mawr Farm) comprises a 200 acre allocation identified on the Proposals Map to the south of Holyhead (Appendix1). A proportion of this allocation has already been developed in connection with Parc Cybi development. The application site for Cae Glas in part includes land within this allocation (see Appendix 1). The application proposes a temporary construction workers accommodation complex in connection with Wylfa B with use thereafter as a leisure village with associated facilities.

Policy 3 (Ty Mawr Farm, Holyhead) states that land is allocated for commercial development at Ty Mawr Farm, Holyhead and that the following uses should be included in the development:

- i. A reserved site for a single business/industrial user requiring a site of about 200 acres.
- ii. A service area of up to about 5 acres incorporating a motel, petrol station and shop operation.
- iii. Extensive landscaping.

The policy goes on to say that any development should be subject to a detailed design brief which shall give careful consideration to any ancient monuments, landscape features and include extensive landscaping. It states that the final design will depend on the alignment and junction position of the proposed new A5/A55 dual carriageway and access roads.

Policy B2 of the Gwynedd Structure Plan states employment provision will be encouraged by ensuring an adequate supply of land and/or buildings at suitable locations. A number of locations are listed which include Employment Estates on Holyhead.

Policy B3 of the Gwynedd Structure states that prestige locations as identified in policy B2 will be retained for uses which clearly require such a location and are included in class B1 in the Town and Country Planning (Use Classes) Order 1987.

Policy B4 states that sites identified in accordance with policy B2 will be protected from other forms of

development including housing and retailing.

As the proposed development is considered not to accord with a number of the provisions of the above policies in so far as it would result in the loss of land safeguarded for employment, it has been advertised as a departure.

### **Kingsland**

Policy 49 of the Ynys Mon Local Plan states that planning permission for housing will be permitted within the settlement boundaries of the listed towns and villages, which includes Holyhead. As can be seen in Appendix 1 of this report the majority of the Kingsland application site is outside of the defined settlement boundary of the proposals map of the Ynys Mon Local Plan for Holyhead.

The part of the Kingsland application site which is within the settlement boundary of the local plan forms part of an allocation encompassing the sports centre and outside sports pitches which is allocated as proposal FF11 (Physical Infrastructure and Environmental Proposal) under the provisions of policy 14 (Recreation and Community Facilities) of the Ynys Mon Local Plan .

As the proposal is made for temporary construction workers accommodation and use thereafter as a residential development the application has been advertised as a departure from the provisions of the Ynys Mon Local Plan and the Gwynedd Structure Plan.

### **Policy Considerations Which Relate to the Principle of Proposed Development**

The planning application encompasses three separate sites at Penrhos, Cae Glas and Kingsland which the local planning authority are being requested to determine collectively due to the linkages between the sites and the developments further detail in relation to this are provided in section 7.

The approach taken is for the relevant policies and material considerations to be identified in relation to each site and their use (in so far as different considerations apply) and in the next section an assessment is made of how the proposals perform against those policies/considerations looking at the proposals both individually and collectively.

### **Penrhos leisure village proposal and Cae Glas extension**

The proposal in relation to Penrhos is for a leisure village in accordance with the application. The development of this site is intended to proceed irrespective of whether Cae Glas and Kingsland are developed.

The proposal in relation to Cae Glas, is (following a temporary use of the site to accommodate construction workers in connection with Wylfa) to provide an extension to the leisure village at Penrhos. It is important to note that the Cae Glas extension to the leisure village would only be developed if the site was initially developed as construction workers' accommodation in connection with Wylfa.

In terms of policy, under the Ynys Mon Local Plan, the Penrhos site is located outside of the settlement boundary (i.e. in open countryside).

It should be noted, however, that under the provisions of the "Stopped UDP" the settlement boundary has been extended around the Anglesey Aluminium site and Penrhos is therefore located on the edge of this settlement (albeit not adjoining it due to bisection of the A5 highway). Whilst the stopped UDP was not fully adopted, the Inquiry inspector did not recommend any amendment to this boundary which had not been subject to previous public consultation and it is therefore considered that weight should be attached to the UDP boundary in the vicinity of the site: the location of the development boundary representing the Council's most recent planning policy statement about the extent of the settlement's built form.

In respect of Cae Glas, a substantial part of the site is allocated in the Ynys Mon Local Plan as an employment site (S1). The remainder of the site, to the south east, adjoins the designation but falls within open countryside. Under the provisions of the "Stopped UDP" the employment allocation, also referred to as S1 is reduced in extent in comparison with the local plan. Subsequently a smaller part of the application site is located within the settlement boundary and within employment proposals S1 (Appendix 2) of the UDP. The remaining part of the application site adjoins but is outside of the Holyhead settlement boundary in the "UDP". That part within the Holyhead settlement boundary is also within a Local Action Area under policy EP3.

Policy B1 of the Gwynedd Structure Plan states that employment generating developments which increase employment opportunities, which do not create unacceptable changes to the environment, and are acceptable to the local planning authority in terms of location, siting, scale, design, access and landscaping will be permitted.

Policy B7 of the Gwynedd Structure Plan states that in considering development which has specific locational requirements not met by the existing supply or allocation of employment land, the listed criteria will be taken into account. These criteria are transport network, relationship with the local labour force, infrastructure provision, effect on the local environment including designated areas, impact on the local community and the agricultural quality of the land involved.

Policy B9 states that there will be a presumption in favour of proposals which expand the number and range of employment opportunities within the rural economy, subject to safeguards for the protection of the environment and the local community.

Policy CH1 states proposals for recreation and tourist development will be permitted where they accord with the policy framework of this plan which is aimed at the creation of employment, and the safeguarding of the environment and local community.

Policy CH2 of the Gwynedd Structure Plan states that the development of new high quality holiday accommodation...will be permitted where they do not conflict with other policies of this plan.

Policy CH10 states that the County Council will support the development of visitor attractions and countryside recreation facilities which are compatible with the culture, history and natural environment of Gwynedd, offer additional all weather facilities to complement the existing natural attractions of the county and which do not have a detrimental effect on the environment and local community.

Policy CH11 states that the county council will encourage the development, at appropriate locations, of all-weather facilities compatible with the overall strategy of the plan especially those capable of use by both residents and tourists.

Policy 2 of the Ynys Mon Local Plan states that on sites outside existing settlements, the council will permit employment developments only in exceptional circumstances where the applicant has been able to demonstrate specific locational requirements and economic benefits which would justify allowing the proposal. The supporting text of policy 2 states at paragraph 3.18 that the Council will only allow new employment sites away from existing settlements in exceptional circumstances, normally relating to recreation and tourism proposals.

Policy FF11 of the Ynys Mon Local Plan provides that on non-allocated sites, recreational and leisure facilities schemes will be permitted where they:

- i. Increase the quality and range of facilities for local residents and visitors.
- ii. Relieve pressure on environmentally sensitive areas.
- iii. Increase public access to open areas which have recreational value.

Policy 8 of the Ynys Môn Local Plan states applications for high quality holiday accommodation will be permitted where they do not conflict with other policies of this plan. In particular, the council will favourably consider proposals which form an integral part of an overall scheme which adds to tourism and recreation facilities in the area. The supporting text of this policy provides further guidance on the provisions of this policy and amongst other considerations landscape and environmental considerations.

Policy EP4 of the "Stopped UDP" states that proposals which increase or diversify the range of employment opportunities, including rural diversification will be permitted where they are of a scale and type compatible with the surrounding area or do not cause significant harm. The policy goes on to state that sites will not be permitted where there are:

- i. Suitable 'brownfield' opportunities available in the area concerned and / or;
- ii. Suitable allocated land is available in the area concerned.

Policy T01 of the “Stopped UDP” states that proposals to further develop existing or create new, tourist attractions will be permitted providing they do not cause significant harm to the environment.

Policy T02 of the Stopped Ynys Môn Unitary Development Plan states applications for high quality holiday accommodation will be permitted where they do not cause unacceptable harm to the environment.

Chapter 11 of Planning Policy Wales Edition 5 relates to tourism development:

Paragraph 11.1.1 states tourism is vital to economic prosperity and job creation in many parts of Wales. It is a significant and growing source of employment and investment, based on the country’s cultural and environmental diversity. Tourism can be a catalyst for environmental protection, regeneration and improvement in both rural and urban areas.

Paragraph 11.1.2 states that the Welsh Government’s objectives for tourism are:

- to encourage sustainable tourism in Wales, promoting local prosperity and supporting community well-being and involvement, while protecting and giving value to natural heritage and culture; and
- to manage the tourism sector in ways which minimise environmental impact.

Paragraph 11.1.9 states development for tourism, sport and leisure uses should, where appropriate, be located on previously developed land. The sensitive refurbishment and re-use of historic buildings presents particular opportunities for tourism and leisure facilities.

Paragraph 3.7 of TAN 18 states that the location of major travel generating uses including employment, education, shopping and leisure can significantly influence the number and length of journeys, journey mode and the potential for multi-purpose trips. Development plans should seek wherever possible to identify locations for such developments, which offer genuine and easy access by a range of transport modes and therefore:

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

Paragraph 3.9 of Technical Advice Note 18 states “Where planning applications are submitted for development on unallocated land and are likely to generate a substantial number of trips then, subject to the policies of the development plan, refusal of such applications may be warranted where the principles of paragraph 3.7 are not fulfilled”.

Policy FF11 and FF12 of the adopted Gwynedd Structure Plan and Policy 1 and 26 of the Ynys Môn Local Plan and Planning Policy Wales, Technical Advice Note 18 (Wales) Transport, Isle of Anglesey Parking Standards (2008) and GP 1 and TR10 of the Stopped Ynys Môn Unitary Development Plan relate contain provisions relating to parking and access considerations.

The Isle of Anglesey Destination Management Plan (2012) (and which specifically includes the Land and Lakes development) emphasises the economic benefits which the tourism sector brings to the local Anglesey economy by generating many jobs on the Island and encouraging local businesses.

In terms of the tourism and recreation policies listed Gwynedd Structure Plan policy CH2 and the Ynys Môn Local Plan Policy 8, are broadly similar, as they permit high quality holiday accommodation provided they form an integral part of an overall scheme which adds to tourism in the area. Policy TO2 of the Ynys Môn Unitary Development Plan (UDP) also promotes high quality accommodation provided it does not cause unacceptable harm to the environment. Policy TO2 of the Ynys Môn Unitary Development Plan (UDP) also promotes high quality accommodation provided it does not cause unacceptable harm to the environment.

The council’s SPG on Holiday Accommodation is a material consideration. This requires any proposal to be

of 'high quality'. Paragraphs 5.2 to 5.4 explains that high quality means in the context of the development plan and Stopped UDP policy related "...to the quality of the development in terms of land use considerations." The guidance goes on to list criteria which help to define the quality of the development in these terms. The criteria is aimed at the protection of the environment and ensuring developments are well located as well as considering matters such as layout, design and use of materials. Material to these is that Penrhos and Cae Glas are located in open countryside on the coastline, which forms part of an AONB. The majority of the land in question cannot be classified as previously developed land. It is also material that the sites are well located in relation to the existing transport network and are in a sustainable location: this is considered further in the relevant section of the report. It also helps to strengthen an existing tourism centre.

The SPG promotes a sequential approach to locating holiday accommodation, with developments within, or edge of, settlement and previously-developed land preferred to sites located in the open countryside or in important landscape designations. The Penrhos site can be regarded as being on the edge of Holyhead which does not comprise previously developed land and which is located in an area designated as forming part of an Area of Outstanding Natural Beauty forming part of the undeveloped coast.

Planning Policy Wales and TAN 18 expect major generators of travel demand to be located within centres or on accessible sites.

Policy B7 of the Gwynedd Structure Plan and Policy 2 of the Ynys Mon Local Plan demand that development not located within settlements are fully justified in terms of locational requirements. It should be noted that the application is supported by a Report by Colliers which sets out the coastal requirements of the leisure element of the scheme.

The tourism and employment policies listed above also require that the development does not cause an unacceptable effect on the environment. Other considerations listed in the policies described above are sustainability, relationship with surroundings, historic considerations, environmentally sensitive areas, safeguarding the local community, cultural considerations, and infrastructure requirements.

Chapter 7 of Planning Policy Wales Edition 5 relates to economic development. This was published in November 2012 and there have been notable changes to Chapter 7. Paragraph 7.2.2 states local planning authorities are required to ensure that the economic benefits associated with a proposed development are understood and that these are given equal consideration with social and environmental issues in the decision-making process, and should recognise that there will be occasions when the economic benefits will outweigh social and environmental considerations.

Paragraph 7.6.1 of Planning Policy Wales Edition 5 states local planning authorities should adopt a positive and constructive approach to applications for economic development. In determining applications for economic land uses authorities should take account of the likely economic benefits of the development based on robust evidence. In assessing these benefits, key factors include:

- the numbers and types of jobs expected to be created or retained on the site;
- whether and how far the development will help redress economic disadvantage or support regeneration priorities, for example by enhancing employment opportunities or upgrading the environment;
- a consideration of the contribution to wider spatial strategies, for example for the growth or regeneration of certain areas.

7.6.2 When considering planning applications which have economic development potential, local planning authorities should seek the views of all relevant local authority departments and particularly from Economic Development Officers as this can assist in the identification of economic benefits.

Paragraphs 7.1.1 and 7.1.2 of PPW define 'economic development' as development of land that generates wealth, jobs and incomes. Paragraph 7.1.2 makes clear that it is essential that the planning system makes provision for the needs of the entire economy and not just those defined as B1, B2 and B8.

Paragraph 7.1.3 of PPW 5 is also material as regard all aspects of the proposal being applied for as follows:

...In addition, wherever possible local planning authorities should seek to guide and control economic development to facilitate regeneration and promote social and environmental sustainability. In so doing, they should aim to:

- co-ordinate development with infrastructure provision;
- support national, regional, and local economic policies and strategies;
- align jobs and services with housing, wherever possible, so as to reduce the need for travel, especially by car;
- promote the re-use of previously developed, vacant and underused land; and
- deliver physical regeneration and employment opportunities to disadvantaged communities.

Paragraph 7.1.4 goes on to state:

In applying these and other considerations, local planning authorities should aim to steer economic development to the most appropriate locations, rather than prevent or discourage such development.

The Penrhos and the Cae Glas sites are located in an area which can be regarded as part of the undeveloped coast in policy terms.

At Cae Glas, approximately 38.1 hectares is proposed as a nature reserve in the vicinity of the coast. This includes the provision of a visitors centre building...

The Penrhos site and more particularly the agricultural headland area form what can also be regarded as part of the undeveloped coast. The Collier's report (October 2012) considered in Section 7 below is submitted in support of the application provides the justification for a coastal location.

Policy D5 of the Gwynedd Structure Plan states that there will be a presumption against proposals to develop sites along the coastline outside the main settlements which would conflict with its landscape character and nature conservation value.

Policy 36 of the Local Plan requires that development in undeveloped areas on and adjoining the coast are strictly controlled and that proposals are physically and environmentally compatible with the character of the area. Relevant criteria include whether the development requires a coastal location and the effects on features of landscape significance; nature conservation or historic value; tourism, recreation or general amenity value.

Paragraph 5.8.2 of PPW states that before major developments are permitted it will be essential to demonstrate that a coastal location is required. TAN 14 Coastal Planning contains similar provisions (paragraph 11).

Paragraph 11.1.6 of Planning Policy Wales Edition 5 states "In some places there may be a need to limit new development to avoid damage to the environment (for example in undeveloped coastal areas),..."

Criteria include whether the development requires a coastal location and the effects on features of landscape significance; nature conservation or historic value; tourism, recreation or general amenity value.

The Penrhos and Cae Glas sites fall within the Anglesey AONB. PPW advises at paragraph 5.5.6 that in National Parks or AONBs, special considerations apply to major development proposals which are more national than local in character and that major developments should not take place in National Parks or AONBs except in exceptional circumstances. There is also a statutory duty to have regard to conserving and enhancing the AONB.

This may arise where, after rigorous examination, there is demonstrated to be an overriding public need and refusal would be severely detrimental to the local economy and there is no potential for locating the development elsewhere or meeting the need in some other way. Any construction and restoration must be carried out to high environmental standards. Consideration of applications for major developments should therefore include an assessment of:

- the need for the development, in terms of national considerations, and the impact of permitting it or refusing it upon the local economy;
- the cost of and scope for providing the development outside the designated area or meeting the need for it in some other way;
- any detrimental effect on the environment and the landscape, and the extent to which that could be moderated.

An assessment of the proposals against these criteria is made in the following section of this report.

Part of the Cae Glas application site is within a Green Wedge (hatched green- Appendix 2) between Ty Mawr, Holyhead and Treaddur Bay.

Policy EN3 of the Stopped UDP states that “Green wedges will be maintained in order to prevent inappropriate development that detracts from the open character of the area and provide an environmental buffer for local communities.” The reasoned justification states that the green wedge here provides a green buffer between the strategic Ty Mawr employment site and the settlement of Treaddur. Green wedges should be undisturbed by development.

PPW AT 4.8.12 states.. The general policies controlling development in the countryside apply in green wedges, but there is, in addition, a general presumption against development which is inappropriate in relation to the purposes of the designation (see 4.8.14 to 4.8.18). Paragraph 4.8.14 states that (in green wedges) “a presumption against inappropriate development will apply. Local planning authorities should attach substantial weight to any harmful impact which a development would have on a Green Belt or green wedge.

Paragraph 4.8.15 states “Inappropriate development should not be granted planning permission except in very exceptional circumstances where other considerations clearly outweigh the harm which such development would do to the green wedge”.

Paragraph 4.8.16 states that the construction of new buildings in a locally designated green wedge is inappropriate development unless it is for the purposes listed in the criteria. One of the criteria listed is “essential facilities for outdoor sport and outdoor recreation, cemeteries, and other uses of land which maintain the openness of the green wedge and which do not conflict with the purpose of including land within it; none of the other criteria are applicable to the proposal subject to this application.

The supporting text of policy EN3 of the Stopped UDP indicates that the green wedge was designated here to provide a green buffer between the strategic Ty Mawr employment site and the settlement of Treaddur. As explained previously the settlement boundary defined in the Stopped UDP is considered to be material and the same applies to its provisions in terms of the locally designated green wedge.

Part of the Cae Glas development is located outside of the settlement boundary defined in the UDP and is therefore located in the countryside and within the locally designated green wedge.

Paragraph 4.9.1 of PPW states “Previously developed (or brownfield) land should, wherever possible, be used in preference to greenfield sites, particularly those of high agricultural or ecological value...” Penrhos and Cae Glas comprise substantially greenfield sites.

The Cae Glas site contains the Trefignath Burial Chamber, which is a scheduled ancient monument. Policy 39 of the YMLP states that the council will use its planning powers to ensure that SAMs and their settings are retained intact.

Policies protecting open spaces are relevant. Under 11.1.3 of PPW, Sport and Recreation it is stated that the Welsh Government’s main planning objectives are to promote:

- a more sustainable pattern of development, creating and maintaining networks of facilities and open spaces in places well served by sustainable means of travel, in particular within urban areas;
- social inclusion, improved health and well-being by ensuring that everyone, including children and young people, the elderly and those with disabilities, has easy access to the natural environment and to good quality, well-designed facilities and open space; and
- the provision of innovative, user-friendly, accessible facilities to make our urban areas, particularly town centres, more attractive places, where people will choose to live, to work and to visit.

11.1.8 Planning authorities should provide the framework for well-located, good quality tourism, sport, recreational and leisure facilities. The areas and facilities provided in both rural and urban areas should be sensitive to the needs of users, attractive, well maintained, and protected from crime and vandalism. They should be safe and accessible, including to deprived or disadvantaged communities and to people whose mobility is restricted, by a variety of sustainable means of travel, particularly walking, cycling and public transport.

Paragraph 11.1.11 - Formal and informal open green spaces, including parks with significant recreational or amenity value, should be protected from development, particularly in urban areas where they fulfil multiple purposes, not only enhancing the quality of life, but contributing to biodiversity, the conservation of nature



and landscape, air quality and the protection of groundwater.

Paragraph 11.1.12 - All playing fields whether owned by public, private or voluntary organisations, should be protected from development except where:

- facilities can best be retained and enhanced through the redevelopment of a small part of the site;
- alternative provision of equivalent community benefit is made available; or
- there is an excess of such provision in the area.

The proposed development would result in the existing cricket pitch and football ground at Penrhos will be lost. However replacement facilities are proposed as part of the Cae Glas development.

Policies in relation to public Rights of Way & Cycle Routes are also relevant. PPW states at paragraph 11.1.13 that local authorities should seek to protect and enhance the rights of way network as a recreational and environmental resource. They are also encouraged to promote the national cycle network, long distance footpaths, bridleways, canals, and the use of inland waters and disused railways as greenways for sustainable recreation.

7.19 Policy 37 in the Local Plan supports proposals that encourage pedestrian access to the coast and countryside provided they are not damaging to nature conservation.

The coastal path along the coastline in Penrhos is currently accessible to the public on a permissive basis. A formalisation of this path so that it becomes a formal public right of way is offered as part of the proposal.

A section of National Cycle Route 8 and Public footpath number 38 go through part of the southern part of the Penrhos site along the route of the old A5 highway which re-routed. These will need to be diverted as they are run along the main vehicular access to the development.

Within the publicly accessible areas of Penrhos, it is proposed that existing informal footpaths to the ponds, pet cemetery and other attractions will also be improved to facilitate pedestrian and wheelchair access.

The proposals at Penrhos also include the development of a leisure facility within close walking distance to Holyhead and the nearby retail Park. There are also bus stops at these retail facilities which allow access to local services within Holyhead and the wider bus network.

Policy 1, 42 and 48 (this policy also includes more general considerations assessed elsewhere) of the Ynys Mon Local Plan, D4, D28 and D29 of the Gwynedd Structure Plan, GP 2 of the Stopped Anglesey Unitary Development Plan, Planning Policy Wales, Technical Advice Note 12 (Wales): Design are material in so far as they relate to the relationship of the development proposed in the outline planning permission with their surroundings.

Special regard must be had to the setting of Listed Buildings and other Historic Structures on the sites. The Stanley Embankment leading to the south of the Penrhos site and the toll house are listed buildings.

Specifically, section 66(1) of the Town and Country Planning (Listed Buildings and Conservation Areas Act, 1990) states that in considering whether to grant planning permission for development which affects a listed building or its setting the local planning authority shall have **special regard** to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Policies D22 of the Structure Plan, 41 Local Plan and EN13 of the Stopped UDP, Planning Policy Wales & Circular 61/96 "Planning and the Historic Environment: Historic Buildings and Conservation Areas" provide policy guidance on the setting of listed buildings.

Circular 61/96 "Planning and the Historic Environment: Historic Buildings and Conservation Areas" provides further guidance and section 11 states "The setting is often an essential part of a building's character especially if a park, garden or grounds have been laid out to complement its design or function. Also, the economic viability as well as the character of historic buildings may suffer and they can be robbed of much of their interest and of the contribution they make to the townscape or the countryside if they become isolated from their surroundings".

PPW at paragraph 11.1.9 states that development for tourism, sport and leisure uses should, where appropriate, be located on previously developed land. The sensitive refurbishment and re-use of historic buildings presents particular opportunities for tourism and leisure facilities.

Both Penrhos and Cae Glas contain trees and woodlands. Penrhos is subject to a Tree Preservation Order made in 1971 generally located on the edge of the reserve and along the A5 corridor. Cae Glas is made up of deciduous, coniferous and mixed woodlands and several newly planted areas estimated as being between 25-40 years of age, there are no TPO's on this area. Part of the Penrhos site includes Plantation Ancient Woodland (PAWS) (around 0.5ha would be affected). EN7 of the Stopped UDP says that development will not be permitted where it would cause unacceptable harm to ancient woodland.

Around 11 hectares of woodland is potentially affected by the development of which 8 hectares would be removed (including 1.7 hectares of trees covered by Tree Preservation Orders). An area of 15 hectares of woodland would remain accessible to the public following the development. It is proposed in mitigation that 4.3 hectares of woodland would be replanted mainly on the headland area. The net loss of woodland at Penrhos would therefore be around 3.7 hectares.

The sites are adjacent to Beddymynach Site of Special Scientific Interest (SSSI) which is of national importance. The Wildlife and Countryside Act, as amended by the Countryside and Rights of Way Act 2000, places a duty on all public bodies (including local planning authorities) to take reasonable steps, consistent with the proper exercise of their functions, to further the conservation and enhancement of the features by reason of which a SSSI is of special interest. SSSIs can be damaged by developments within or adjacent to their boundaries, and in some cases, by development some distance away. There is a presumption against development likely to damage a SSSI. Before authorising operations likely to damage any of the notified features on a SSSI, local planning authorities must give notice of the proposed operations to NRW, and must take its advice into account in deciding whether to grant planning permission and in attaching planning conditions.

The Safeguarding Maps for Wales prepared by the British Geological Survey highlights areas of the application site to include reserves of sand and gravel and also the designation of Penrhos as a Mineral Site within the stopped Ynys Môn Unitary Development Plan (site 11), which is designated for sand and gravel and has a 400 meter buffer which encompasses much of the application site. Originally an objection was received to the development of Penrhos because it would sterilise sand and gravel resources on the site, however that objection has been withdrawn.

Section 13.4 of Planning Policy Wales (March 2002) is also relevant. This provides advice on development control and flood risk. Further advice is contained in Technical Advice Note 15 "Development and Flood Risk". Part of the application site is within Zone C2, as defined by the Development Advice Maps (DAM) referred to under TAN 15 Development and Flood Risk (July 2004), which requires that development in zone C is justified by demonstrating that:

- i. The location is necessary to assist, or be part of a local authority regeneration initiative or a local authority strategy required to sustain an existing settlement, or
- ii. It's location in zone C is necessary to contribute to key employment objectives supported by the local authority strategy required to sustain an existing settlement, and
- iii. It concurs with the aims of Planning Policy Wales and meets the definition of previously developed land, and
- iv. The potential consequences of a flooding event for the particular type of development have been considered in terms of the criteria of TAN 15 and considered acceptable.

PPW (6.5.1) deals with archaeology and states where nationally important archaeological remains, whether scheduled or not, and their settings are likely to be affected by proposed development, there should be a presumption in favour of their physical preservation in situ. In cases involving lesser archaeological remains, local planning authorities will need to weigh the relative importance of archaeology against other factors, including the need for the proposed development.

At 6.5.2 PPW explains that based on archaeological assessments that if important remains are thought to exist at a development site, the planning authority should request the prospective developer to arrange for an archaeological field evaluation to be carried out before any decision on the planning application is taken. Based on these investigations (6.5.3) where LPA's decide that physical preservation in situ of archaeological remains is not justified and that development resulting in the destruction of archaeological remains should proceed, LPAs should be satisfied the developer has made appropriate and satisfactory provision for archaeological investigation, recording and publication before granting planning permission.

Welsh language is dealt with in paragraph 4.13.1 of PPW which states the future well-being of the language across the whole of Wales will depend on a wide range of factors, particularly education, demographic

change, community activities and a sound economic base to maintain thriving sustainable communities. The land use planning system should also take account of the needs and interests of the Welsh language and in so doing can contribute to its well-being. Policy 1 of the Ynys Mon Local Plan and TAN 20 also indicate that the needs of the Welsh Language are a material consideration in determining planning applications.

Paragraphs 4.23.2 & 4.23.3 of PPW set out development plans should take into account the needs of the Welsh Language and chapter 10a of the Stopped UDP sets out the approach of this plan. It states the key issue is the location, scale and phasing of development and that the housing and settlement strategy is generally based upon the principle of allowing growth in housing numbers proportionate to the size of the settlement. (10a.10).

The Isle of Anglesey Council (2007) SPG Planning and the Welsh Language and sets out circumstances where a Language Impact Assessment should be submitted with a planning application as has been done in this instance, and assessment considerations.

## **Kingsland**

The development at Kingsland involves the construction of permanent properties for workers on a temporary basis (as HMOs) that will, following the temporary use for construction worker accommodation in connection with Wylfa, be occupied as 'conventional' residential properties (market and affordable).

National planning policies material to construction workers accommodation and the Council's position statement in relation to Kingsland and the Cae Glas site are dealt with below.

This section considers development plan and other material policy considerations in relation to the legacy use of the Kingsland site for residential development.

Development on the Kingsland site, in the same way as the Cae Glas site, will not take place unless it is required in connection with the development of Wylfa B nuclear power station construction workers. The occupiers of the HMO properties at Kingsland will also be dependent on the facilities at the Cae Glas development; this is the linkage being promoted as part of the package of developments.

Policy 49 of the Ynys Mon Local Plan states planning permission for housing will be permitted within the settlement boundaries of the listed towns and villages, which includes Holyhead. As with Penrhos and Cae Glas, the majority of the Kingsland site falls outside of the settlement boundary as defined in the Ynys Mon Local Plan (Appendix 1).

Policies in the Gwynedd Structure Plan (A6), the Ynys Mon Local Plan (53) and HP6 of the Stopped UDP, restrict development in the countryside. Paragraph 4.7.8 of PPW states "Development in the countryside should be located within and adjoining those settlements where it can be best be accommodated in terms of infrastructure, access and habitat and landscape conservation..."

Under the provisions of the Stopped UDP (which is considered to carry weight for the reasons stated above), Holyhead is identified as a main centre under the provisions of policy HP3. Policy HP3 permits new housing development on the allocated sites and other suitable sites within the development boundary.

Policy 1 of the Ynys Mon Local Plan lists criteria that will take into account in determining planning applications. General Policies GP1 and GP2 of the stopped UDP provide checklists of material and technical considerations when an individual application for development is being considered. The checklists have been prepared to encompass issues relating to sustainable development and other material planning considerations.

The settlement boundary for Holyhead has been amended under the provisions of policy HP3 of the "UDP & the majority of the application site is within the settlement boundary, although identified for leisure uses pursuant to policies FF6 and F11 (Appendix 2).

In terms of new housing, need is an important consideration. PPW and TAN1 require local planning authorities to ensure that sufficient land is genuinely available or will become available to provide a 5-year supply of land for housing judged against the general objectives and the scale and location of development provided for in the development plan.

The 2011 JHLAS, demonstrates a 5.1 years supply of land. The Inspector's report regarding the 2012 Joint Housing Land Availability Study, has determined that Anglesey has a 5.8 years supply of land for housing.

The Interim Planning Policy Large Sites (50+) was introduced in order to facilitate development that could assist the Council to maintain the required 5 year land supply. This Policy supports sites within or adjacent to development boundaries of the 3 main centres (which includes Holyhead) since they are the most sustainable locations for future growth. However, the Interim Planning Policy does not identify specific sites rather it is a criteria based policy to evaluate the need and suitability or otherwise of a specific site. Furthermore, given that the proposal is for the units to be used initially as temporary construction workers accommodation, they will only become available for "conventional" housing after this temporary use as construction workers' accommodation has ended and the units have been refurbished. According to the applicants, this is unlikely to occur until 2027-2029(6.4 ES Addendum – May 2013).

It is considered that the proposal fails to address the main purpose of the Interim Planning Policy, i.e. to facilitate the provision of 'conventional' housing to maintain a 5 year land supply until the Joint LDP's policies can be applied. The provisions of the Interim Planning Policy on Large Sites are therefore considered to be inapplicable to this proposal.

Policy 14 in the Local Plan safeguards land at Kingsland for the development of an ice rink. Policy FF6 in the stopped UDP safeguards land at Kingsland in order to facilitate an upgrade of the Leisure Centre and Holyhead Stadium, provision of Golf Driving Range, Archery Range and relocation of Holyhead Rugby Club pitches and cricket square.

Around 1.3 ha of the Kingsland application site falls outside the settlement boundary of the Stopped UDP under the provisions of policy HP3. These are illustrated on the map enclosed as Appendix 3.

Policies in relation to affordable housing are relevant. Policy A9 of the Gwynedd Structure Plan, 51 of the Ynys Mon Local Plan, HP7 of the Stopped Anglesey Unitary Development Plan, the Council's Supplementary Planning Guidance on Affordable Housing and the Affordable Housing Delivery Statement require that affordable housing up to 30% is provided on sites of 10 or more dwellings. Notwithstanding this requirement, the applicants are proposing 50% affordable housing is provided within the legacy residential use in Kingsland.

The site falls within the AONB. Therefore, the policies which apply to Penrhos and Cae Glas (see above) apply equally to the Kingsland proposals. In particular, regard must be had to PPW 5.5.6 as outlined above.

Other relevant policies which apply to Kingsland and which have been outlined above in relation to Penrhos and Cae Glas are PPW (previously developed land); (archaeology); and Welsh Language PROW, Sustainability, Protected Species and Ecology

### **Workers Accommodation**

As highlighted above, permission is being sought to use both Cae Glas and Kingsland on a temporary basis in order to provide living accommodation for construction workers who are employed at Wylfa.

It is proposed that if the sites are not first used for this use, the legacy development (leisure at Cae Glas and residential at Kingsland) will not take place. Therefore, the proposals at both these sites are dependent upon the construction worker element of the development.

The comments made in respect of the settlement boundary and the Stopped UPD (see above) applies equally to workers accommodation as they do to the legacy developments proposed.

Furthermore, the policies in relation to economic development, AONB, undeveloped coast, SSSI, Green Wedge, Archaeology, Welsh Language and the other policies mentioned above apply equally to the proposal for construction workers accommodation at Cae Glas and Kingsland as they do to the legacy uses on those sites and therefore regard must be had to them.

In terms of the construction worker use, there are no local planning policies which are directly relevant. However, there are a number of National Planning Statements (NPS) which are relevant.

These Statements provide the primary basis for decisions taken by the Major Infrastructure Planning Unit within the Planning Inspectorate on applications it receives for nationally important major infrastructure projects. In England and Wales, the relevant NPS is a material consideration in decision making on relevant applications that fall under the Town and Country Planning Act 1990 (as amended).

The need case for nuclear is set out in EN1. This identifies that there is a need and urgency for new energy infrastructure to be consented and built with the objective of contributing to a secure, diverse and affordable energy supply and supporting Government's policies on sustainable development, in particular by mitigating and adapting to climate change is set out in NPS – EN1.

Paragraph 3.11.2 of EN-6 states that EN-1 notes that the construction, operation and decommissioning of energy infrastructure may have socio-economic impacts. It is noted that nuclear power stations involve large scale construction projects at the beginning of their life. The Nuclear AoS identified that there are likely to be positive effects of local economic significance. Volume II of NPS EN6 identifies the boundary of the site for the new nuclear power station on Anglesey. The site is included on a schedule that the Government believes is realistic for new nuclear power stations to be operational in the UK from 2018, with deployment increasing as we move towards 2025.

Section 5.12 of NPS EN1 advises on the possible socio-economic impacts of projects at local and regional levels. The possible impacts are included in paragraph 5.12.3 and include the impact of a changing influx of workers during the different construction, operation and decommissioning phases of the energy infrastructure. This could change the local population dynamics and could alter the demand for services and facilities in the settlements nearest to the construction work (including community facilities and physical infrastructure such as energy, water, transport and waste).

Recognising the need for accommodating construction workers in connection with development of the new nuclear power station at Wylfa, the Council has an approved Position Statement regarding accommodating construction workers. This states that the Council considers that an overly intensive use by construction workers of local bed and breakfast and other forms of temporary accommodation would conflict with the important role this type of accommodation plays in facilitating the tourist sector in the local economy. The Council considers that 33% of the anticipated need for construction workers' accommodation should be satisfied via purpose built construction workers' accommodation. The Position Statement further states that only a small proportion of the purpose built accommodation should be provided on site, with the remainder provided on one or more sites on the Island. This Position Statement is considered to be material planning consideration (although as it involved targeted consultation with specified interested parties, it is considered it should be given limited weight for development control purposes).

How the construction worker accommodation proposals perform against the national policies, approved Position Statement and planning policies generally is discussed in the next section.

## **7. The overall planning balance**

This section of the report discusses the main issues, summarises the principal policy and other considerations and looks at how the proposals perform against those policies/considerations.

### **The Application**

The proposals are outlined in detail in the previous sections to this report and comprise a number of different elements. An important consideration is that the proposals are presented as a package, all of which are stated to be necessary to make the development viable and allow it to proceed.

Specifically, the leisure/tourism development at Penrhos is stated in the application to require a coastal location. An extension to this facility at Cae Glas depends upon Penrhos for its facilities and coastal access. The worker accommodation proposals between Cae Glas and Kingsland are linked in that Cae Glas will provide the hub for both sites with all central facilities being located at Cae Glas. As acknowledged previously, the worker accommodation aspects of the proposal are integral. If they do not happen then the legacy uses at Cae Glas and Kingsland will not happen either.

It is therefore on this basis that the proposals are considered.

### **Approach to policy and the development plan**

The previous section set out why both Cae Glas and Kingsland are departures from the development plan. The development plan comprises the Gwynedd Structure Plan (1992) and the Ynys Mon Local Plan (1996). However, in many respects, given the age of the plans and policies they are outdated.

PPW explains that where policies are outdated or there are no relevant policies, the planning system provides a presumption in favour of sustainable development to ensure that social, economic and

environmental issues are balanced and integrated. The application must be assessed in line with this policy guidance, taking into account relevant development plan policies together with national planning policy advice where development plan policies are outdated or where none exist (PPW 4.2.4).

It is considered that greater weight should be attributed to the Stopped UDP, which is a more up to date document (2005) representing the local planning authority's most recent statement of planning policy incorporating the recommendations of the UDP Inspector following the Plan Inquiry. Weight should also be attached to PPW itself as the most up-to-date national planning policy statement.

### **Settlement boundary considerations**

The Stopped UDP places both Penrhos and that part of Cae Glas outside the settlement boundary as effectively adjoining the settlement of Holyhead and this is of relevance in terms of policies in PPW, TAN 18 and SPG on Tourism and consideration of sustainability in terms major developments and tourism.

It is considered that significant weight should be attached to the fact that the Stopped UDP boundary places Kingsland within the settlement boundary of Holyhead (save for two small areas of the site which, therefore, form part of the countryside in policy terms).

Notwithstanding the relationship of the sites to the settlement boundary, none of the sites comprise previously developed land. It is recognised that tourist uses should be located on previously developed land where appropriate and, more generally, brownfield land should, wherever possible, be used in preference to greenfield sites, particularly those of high agricultural or ecological value. The ecological issues in relation to the sites are dealt with below. The advice of the Welsh Government (Natural Environment and Agriculture Team) is that the likelihood of the Best and Most Versatile land being lost is low.

### **Site allocations**

The Penrhos site, in planning policy terms, is unallocated and falls within the countryside.

Part of the Cae Glas site is within Proposal S1 of the stopped UDP. As noted above, this is an employment allocation. However, since the allocation was made "Parc Cybi" has been substantially completed and remains available for traditional B1, B2 and B8 general industrial uses. It is therefore considered that the loss of stopped UDP Proposal S1 land at Cae Glas would not have a significant detrimental effect on the overall provision of employment land on Anglesey. The remaining part of the Cae Glas site is unallocated and within the countryside.

Most of the Kingsland site falls within the settlement boundary and therefore policy HP3 of the Stopped UDP applies. This defines Holyhead as a main centre where new housing will be permitted within allocated sites and other suitable sites within the development boundary.

However, it should also be noted that as identified in section 6, most of the Kingsland site is allocated under policy FF6 of the Stopped UDP which safeguards the land for an upgrade to Holyhead Leisure centre. However, no proposals have come forward for a leisure use on this site and the council's leisure section has confirmed that only a small area outside the application site next to Holyhead Sport Centre would be required in future, which would not affect the development area subject to this planning application. It is therefore considered that the proposed uses of the Kingsland site will not compromise leisure provision in the area.

In terms of the areas which fall outside of the settlement boundary and FF6 allocation at Kingsland, these are highlighted as Areas 1 to 3 on the plan at Appendix 3. It is considered that these areas are small in terms of the overall size and follow the natural ground and field boundary features providing a logical boundary to the development. In respect of Area 1, this forms an integral part of the proposal: providing the vehicular access to the development.

The plans at Appendix 1 and 2 show the settlement boundary and site allocations.

### **Need for the development**

The need for the development is an important consideration in determining the planning application.

The Construction worker's accommodation is required to deliver a nationally important infrastructure project supported by the UK and Welsh Governments. National policies in relation to energy development were described in the previous section to this report. Volume II of NPS EN6 identifies the boundary of the site for

the new nuclear power station on Anglesey.

As noted previously, evidence supporting the Council's Position Statement on Construction Workers Accommodation in connection with Wylfa suggests that sole reliance on either existing residential or tourism accommodation on the Island cannot deliver the required number of accommodation units and that a mixed approach in accordance with the Position Statement would provide a feasible and viable approach. This would also minimise impact on the local housing market and the tourism sector. Although it is difficult at this stage to specify the total number of workers the construction of Wylfa B will generate, of the 33% envisaged to be provided as purpose built accommodation, these proposals are likely to meet that requirement.

Providing accommodation will be crucial as failure to attract sufficient labour will prolong the duration of the construction period, delaying the completion of the nuclear power station. It is therefore considered that there is a need for construction worker accommodation. It is recognised that the need won't arise until consent is in place for the development of Wylfa B. As such, in line with the 'package' approach to the developments, the applicants are proposing that should consent be granted, if for any reason the construction worker accommodation is not required, the legacy uses on those sites (Cae Glas and Kingsland) will not take place. This can be safeguarded by way of a section 106 obligation.

In terms of the leisure development at Penrhos and Cae Glas, as well as the economic need cited for such a development, there is considered to be a national need for tourism proposals such as this. Tourism Partnership North Wales have made detailed comments on the planning application (which are contained in the consultation section of the report) and state that *"The Land and Lakes project would be of national significance in terms of tourism development and promotion. It will contribute to the national objectives of Visit Wales' Tourism 2020, i.e. to grow tourism in Wales by 10%, between 2013 and 2020."*

In relation to Kingsland, as noted in section 6 of this report, the Inspector's report regarding the 2012 Joint Housing Land Availability Study, has determined that Anglesey has a 5.8 years supply of land for housing. There is not, therefore, a need demonstrated for additional housing within the next 5 years. However, it is recognised that any housing on the site will be delivered outside of the 5 year period (indeed, is likely to be much nearer 2026) and therefore the housing element of the proposal should be balanced in context of the need for the other elements of the development and relevant policies and material considerations identified below.

### **Economic development**

The Development Plan and Stopped UDP policies pre-date a significant change made in PPW in relation to adopting a positive and constructive attitude to an application for economic development, taking into account the likely economic benefits of development based on robust evidence. As explained in the Welsh Government "Summary of Changes – Planning Policy Wales Edition 5" (October 2012) Chapter 7 of Economic Development "The entire chapter has been revised to align planning policy on economic development more closely with the Welsh Government's broader economic policies and to try to ensure that the planning system in Wales facilitates economic renewal more effectively." It is considered that these benefits should be given significant weight.

In terms of what constitutes economic development pursuant to paragraphs 7.1.1 and 7.1.2 of PPW, this would apply to the construction workers' accommodation and tourism proposals at Cae Glas. It would also apply to the construction workers' accommodation at Kingsland and to the tourism proposals at Penrhos.

The need for additional employment in Holyhead and the surrounding area in order to try to reverse the adverse impacts of recent major job losses is undisputed. The economic benefits expressed in the application are clear. The development represents a potential investment of a significant level of capital into the local economy, during both construction and operation, assisting to diversify the local economy and providing an important complementary development to other public and private sector regeneration projects for the area. In the applicant's supporting documents, the economic impact is described as presenting "a rare opportunity to create a significant and much needed step change in the economy of the Isle of Anglesey".

The applicant has provided evidence to demonstrate that if permission is refused, there will be no new long term job creation nor will any of the other benefits of the scheme be delivered. The acute need for economic growth and regeneration, and major intervention to significantly improve the economic prospects for the local community will remain unfulfilled and are likely to become more acute. The economic indicators for Anglesey, including the decline in overall employment; the low levels of GVA compared to Wales and the UK average; the migration of working age residents and their loss to the Island are just some of the indicators which will continue to deteriorate in the absence of developments such as the application proposals.

The council's EDU has confirmed that it is satisfied with the evidence presented by the applicant about the economic benefits arising from the leisure village, given their assessment on economic grounds it is considered the proposal complies with the policy requirements in PPW. Mitigation has also been recommended to ensure that the development does not displace or have negative effects on existing tourism facilities and to ensure that the economic benefits are dispersed.

In terms of the paragraph 7.1.3 of PPW, specifically the aim to deliver physical regeneration and employment opportunities to disadvantaged communities, the council's Head of EDU has confirmed in that the Holyhead Travel to Work Area (TTWA) now has the highest Job Seekers Allowance (JSA) rate, and the second lowest job density rate of any TTWA in Wales. The letter also states that persistent long-term poverty, deprivation, inactivity and joblessness in Holyhead have been a problem for many years. In addition this has been further compounded recently with the closure of major employers such as Anglesey Aluminium and Eaton Electrical; the employment opportunities from the Land and Lakes development are therefore critical to hopefully transform the socio-economic fortunes of Holyhead. The potential to deliver physical regeneration and employment opportunities to disadvantaged communities is considered to provide economic weight in favour of the development.

Having regard to advice in Paragraph 7.1.4 of PPW, it is considered that steering economic development to the most appropriate location, which in this instance indicates Holyhead, would be broadly in accordance with this policy, rather than preventing or discouraging development.

PPW 7.6.1 (see section 6 of this report) emphasises the need to take into account the likely economic benefits based on robust evidence.

The application is supported by reports by Regeneris which outline the economic and tourism benefits of the proposals and provide social and economic evidence. The report indicates that on-site construction jobs will amount to some 150 FTE posts per annum. Once fully operational some 465 FTE on-site jobs will be created. The main bulk of jobs are in housekeeping, food and beverage, leisure services and general administration. Many more jobs will be provided off-site as a result of the development and it is estimated 110 FTE off-site jobs related to local food and drink producers and other facilities and activities linked to tourism spend could result.

In addition the Regeneris Reports indicate that the percentage of people working in skilled trades was considerably higher on Anglesey (16.7%) than either North Wales (14.3%) or Wales (13.4%). This is of relevance since it indicates that the Island's workforce could provide a pool of transferrable skills, which could be employed during the construction works to generate economic benefits for Anglesey. The data also shows a relatively high proportion of residents employed in tourism related occupations.

The Regeneris Reports state that many people claiming JSA were seeking construction work. They show that there are 290 JSA claimants in Anglesey currently seeking positions in skilled trade occupations. The data also reveals lots of latent capacity with a total of 900 JSA claimants currently seeking jobs in construction and personal/customer service type occupations.

One of the findings of the report was that very recent redundancies in Anglesey have released yet more job seekers into the local labour market, many of whom could be very quickly trained with the skills required to work at the Penrhos leisure village, as the tourism sector does not, in the main, require specialist skills and staff can be trained quickly with the requisite skills.

Given the above significant weight can be attributed to the number and type of jobs created. Paragraph 7.4.3 of PPW is also material and states local planning authorities should take into account the possibility that certain kinds of businesses may be especially important in providing opportunities for social groups disadvantaged within the labour market. Whether this is the case can only be determined by analysis of the circumstances at the time, and will need to be kept under review. However, there is the potential for the development to provide this.

The national planning policies listed highlight the importance of tourism to the economy. The Regeneris Reports details the economic advantages of the scheme in the context of Anglesey where tourism has an important role in the local economy. It also considers the impacts on existing tourism operators in terms of displacement, staffing requirements, target market and the supply chain. The information has been assessed by the council's EDU who have confirmed that the Land & Lakes development is recognised in the recently adopted Anglesey Destination Management Plan (DMP) 2012-2016 as a potential transformational development for the Island sector, by creating a high quality "destination resort".



The economic considerations listed above clearly weigh in favour of the tourism development. Although no explicit information is provided in the Regeneris Reports, there will also be economic benefits to the local economy in terms of housing a significant number of construction workers in the area. This needs to be balanced with the environmental, social and other policy considerations (see below).

## **Sustainability**

In terms of sustainability, Holyhead is the largest settlement on Anglesey and it provides a wide range of facilities and services including a library, shops, GP surgeries sports and leisure facilities. The railway station provides a direct link to the national rail network with daily trains direct to Cardiff and London. Local bus services are available in the town, there are services to other centres and a regular service to Bangor, and coaches also connect with major UK centres. The A55 expressway leads to the national motorway network has two junctions in the town, one of which is in close proximity to the application sites. The port also provides ferry services to Ireland, berthing for International cruise liners and the facility for cargo to be docked. Anglesey Airport is also located at Valley in proximity to Holyhead.

As described in the section 6 of this report, PPW and TAN 18 seek to ensure that the location of major travel generating uses including employment and leisure is located near such public transport interchanges. PPW promotes a resource efficient settlement pattern by locating developments so as to minimise the demand for travel, especially by the private car. Similarly, these policies expect major generators of travel demand to be located within centres or on accessible sites.

In relation to PPW and TAN 18, the Penrhos and Kingsland sites are considered to have good pedestrian, cycle, road and rail links and wider ferry links beyond. Cae Glas can be considered in similar terms but to a lesser degree due to the greater distance to Holyhead.

Paragraph 7.1.3 of PPW includes the aim of aligning jobs and services with housing, wherever possible, so as to reduce the need for travel, especially by car. This advice weighs in favour of the proposed development in terms of the proposed nuclear workers accommodation at Holyhead, given the services available and the sustainability credentials of the settlement of Holyhead. It also weighs in favour of the provision of a significant tourism/leisure facility.

## **Area of Outstanding Natural Beauty**

As noted in section 6, all three sites sit within the AONB and therefore special considerations apply. As identified in section 6 of this report, major developments (which the application is considered to be) should not take place in an AONB except in exceptional circumstances.

The policy states that such exceptional circumstances may arise where, after rigorous examination, there is demonstrated to be an overriding public need and refusal would be severely detrimental to the local economy and there is no potential for locating the development elsewhere or meeting the need in some other way. Additionally, any construction and restoration must be carried out to high environmental standards.

As identified in section 6, paragraph 5.5.6 states that consideration of applications for major developments should therefore include an assessment of:

- the need for the development, in terms of national considerations, and the impact of permitting it or refusing it upon the local economy;
- the cost of and scope for providing the development outside the designated area or meeting the need for it in some other way;
- any detrimental effect on the environment and the landscape, and the extent to which that could be moderated.

Need has been discussed above and it is considered that, in terms of national considerations, a need exists. Whilst the residential legacy proposal at Kingsland, based on current housing supply, does not address a need, taken together with the proposed construction workers accommodation and the tourism/leisure proposals, it is considered that a need does exist. It is considered that there is a national need for nuclear workers accommodation in connection with the construction of Wylfa. There is also a national need for the leisure uses as highlighted by the Tourism Partnership North Wales which has indicated the proposal will contribute to national tourism objectives.

Furthermore, taking into account the national policies in PPW in respect of economic development, it is

considered that this demonstrates there is a need for the development. The detail of this, and the impact of permitting or refusing the application, has been outlined above.

Specifically in relation to the impact of permitting the development on the local economy, as described earlier in this section of the report, Holyhead is a logical location for the reasons provided in terms of the availability of services. Failure to provide an appropriate site for workers' accommodation in accordance with the council's Position Statement on workers accommodation, could delay or prolong the build period of Wylfa B which is likely to have negative impacts on the local economy.

The second limb in paragraph 5.5.6 requires an assessment of the cost and scope of providing the development outside of the AONB.

In relation to the workers' accommodation, the applicant has submitted a list of the minimum site requirements needed to provide a viable scheme to house construction workers and which, therefore, informs the size and requirements of a site. Using this as a basis for identifying alternative sites, the applicants have concluded that no suitable sites are available at Llangefni or Amlwch. In terms of Holyhead, the applicant's submission acknowledges that a site at the Holyhead Waterfront could be promoted as workers accommodation. The applicant, however, considers that this site would be complementary to Penrhos and Cae Glas, and would need to rely upon Penrhos for its central facilities. It should be noted that if the construction worker accommodation proposals were disaggregated from the remaining development proposals, there are likely to be locations, such as Rhosgoch, where worker's accommodation could be considered.

A number of alternative sites have also been looked at in respect of the tourism/leisure proposals. In the same way as the worker accommodation proposals, if these were disaggregated from the other elements of the proposal, then there may (subject to availability) be alternative sites such as the Laird's site or Ferodo Dynamex, which albeit is in a designated area, comprises an allocated site for leisure purposes and previously developed land. However, such sites would not accommodate the scale of the proposal subject to this report nor offer the economic benefits.

In relation to the legacy housing proposals at Kingsland, given the most recent Joint Housing Land Availability Study, it is clear that the 5 year supply of housing sites can be maintained on a combination of sites not within the AONB, (i.e. such housing can be accommodated elsewhere in Holyhead, in and around the other two largest settlements or on other settlements outside the AONB on Anglesey).

However, the application is made for an integrated proposal and the submission is based the need for the proposal to be assessed collectively due to the linkages and inter-dependence between the individual sites and proposals. On this basis, whilst elements of the proposal would or may not meet the criteria in the second limb of PPW 5.5.6, it is considered that taken as a whole, there is little if any scope for locating the developments elsewhere and meeting the need in some other way. In this regard, the requirement for a coastal location is important (which is dealt with below).

In terms of the third limb of 5.5.6 (assessment of any detrimental effect on the environment and the landscape and how that can be moderated), the comments of NRW and the council's Landscape Architect are material. NRW originally objected to the proposals, but have since withdrawn their formal objection (although their concerns over the overall impact remain). In summary the council's Landscape Officer considers the proposals will have an impact on all three sites, some of which will be adverse and some beneficial. From the findings of the Landscape and Visual Impact Assessment, it is clear that all 3 sites within the AONB will experience adverse landscape and visual impacts in the first 3 to 8 years of development. Over 10+ years some of these impacts are likely to reduce as planting and mitigation mature. It is considered material in this context that in weighing any detrimental effect on the environment and the landscape, that the Kingsland site is substantially within the settlement boundary of the UDP and that part of the Cae Glas site is within the settlement boundary and allocated for industrial purposes. Given that built development is generally acceptable in principle within these development boundaries, the degree to which there is a detrimental effect on the environment and the landscape needs to be balanced in this context.

The council's Countryside and AONB Officer has also made comments having regard to the statutory status of the Isle of Anglesey's AONB Management Plan 2009-2014 and the special qualities of the AONB in the submission and the overall assessment of the planning application, including mitigation proposed. Notable aspects affected are that the peace and tranquillity of the AONB by the scale of the development and associated lighting and noise. Positive aspects include the proposed visitor Centre at Beddymynach, and opening up a nature reserve at Cae Glas with access provision. These aspects have been taken into account in relation to the requirement to have regard to the conserving and enhancing the AONB.

## **Green Wedge**

Part of the Cae Glas site is within an area designated as a green wedge and will be lost to built development. Policy EN3 of the Stopped UDP states that “Green wedges will be maintained in order to prevent inappropriate development that detracts from the open character of the area and provide an environmental buffer for local communities.” The supporting text to EN3 indicates that this was designated to provide a green buffer between the strategic Ty Mawr employment site and the settlement of Treaddur.

PPW at 4.8.12 contains a presumption against development inappropriate in the green wedge to the purposes of designation and the advice states LPA’s should attach substantial weight to any harmful impact. However, a significant part of the green wedge is to be retained and maintained as mixed and coniferous woodland (to the south and east) and managed heathland (to the west) and 38 acres is to become a nature reserve. A cricket pitch is also proposed next to Treaddur Mews. Having regard to the advice in 4.8.16 of PPW, these proposed uses maintain the openness of the green wedge and it is considered do not conflict with its purpose.

It will be noted that buildings are proposed in association with the nature reserve and the cricket pitch. However, these are not considered to constitute inappropriate development under paragraph 4.8.16 of PPW as they are buildings in connection with an outdoor recreation use of the nature reserve/cricket pitch which will maintain the openness of the green wedge and will not conflict with its purposes.

In landscape and visual terms the proposals have been assessed and it is considered they would maintain a buffer to the south and south west with Treaddur. Mitigation is also proposed in terms of advanced planting to enhance and reinforce this part of the buffer between the built development.

Therefore, whilst erosion of part of the green wedge by built development will occur, the majority of the green wedge will remain and the other aspects of the Cae Glas proposals are not considered to conflict with the green wedge policies. Nevertheless, the advice in PPW is that planning permission should only be granted in very exceptional circumstances where other considerations clearly outweigh the harm. As such, the other considerations relevant to the proposals as discussed in this report are key and need to be balanced accordingly.

## **Undeveloped coast**

The Penrhos and the Cae Glas sites are located in an area which can be regarded as part of the undeveloped coast in policy terms. In terms of the Penrhos site and more particularly the agricultural headland area they form what can be regarded as part of the undeveloped coast under Development plan policies 5 and 36 of the GSP and YMLP respectively, PPW and TAN 14 advise that considerations include the need for a coastal location and assessment of landscape, nature conservations, historic, recreation and amenity considerations. Some of these considerations are assessed in the consultation section of this report and have positive impacts, but they also have negative ones. For instance, the council’s landscape officer considers that the impact would be highly adverse on the headland area.

Policies in respect of the undeveloped coast require justification as to why a coastal location is required. The justification for a coastal location is contained in the Colliers Report (October 2012) accompanying the application. This justification does not comprise a functional requirement or a necessity for a coastal location in the strict sense of the meaning such as if the application proposed a Marina, however a coastal location is stated to be fundamental to the business case for the leisure uses. The report makes it clear that the coastal location is central to the development of the leisure village concept and is designed to form the principal point of distinction from the forest destination centres such as Centre Parcs. Essentially, the coastal aspect is the development’s Unique Selling Point “USP”.

## **Site of Special Scientific Interest**

The Penrhos and Cae Glas sites are adjacent to the Beddymynach SSSI. Reasonable steps must be taken to further the conservation and enhancement of the features by reason of which a SSSI is of special interest, in this case being ornithological. There is a presumption against development likely to damage a SSSI and notice of operations must be given to NRW and the council must take account of its advice.

As mentioned above in the context of AONB, NRW do not object to the proposals but do have concerns over the overall impact. However, no specific concerns have been raised in relation to the impact on the SSSI although the issues raised in relation to the AONB are of relevance here.

## **Socio-economic Impacts of the development**

A number of socio-economic impacts have been identified which are material to a decision on the planning application. These are dealt with below.

As part of the submission a Regeneris Report which accompanied the application assessed likely socio economic impacts of the development. In response, the council commissioned URS to undertake an assessment of the anticipated impacts of the Land and Lakes development (which includes assessment of the Regeneris Report).

The socio economic impacts assessed include all aspects of the proposals from the initial construction, use a workers' accommodation and the tourism and residential uses. The position on these is as follows

### **a) Education – primary and secondary schools**

The council's Lifelong Learning Department originally requested significant financial contributions towards primary and secondary education, a new language centre and further development of youth centres as mitigation in connection with the proposals should permission be granted.

However, URS advise that at this point in time it is difficult to be precise as to the future demand in terms of school places resulting from the phases of the proposed Land and Lakes scheme. This will ultimately be dependent on the extent to which construction workers are in-migrants to the area and they bring their families with them. The overall demand for education places in primary and secondary schools can be accommodated by current surplus capacity in the impact area, although this position is likely to change due to current plans for school reorganisation. Land & Lakes should, therefore, make financial contributions toward the funding for additional school places created by the different phases of the Land and Lakes development to be assessed at the time according to need.

### **b) Health – primary care and community health**

The Betsi Cadwalader University Health Board has not indicated in its consultation response that the development will result in additional pressures in terms of health services.

URS advise recognises that demands on GPs are expected to be greatest from the proposed development as well as the minor injuries unit in Holyhead. With the higher-risk nature of the outdoor leisure tourism and construction workforce, the actual additional demands on the existing health provision may be greater than those identified. It is also likely that the nuclear new build construction accommodation and Kingsland permanent residence phases will place greater demands on existing GPs, dentists and hospital provision in the impact area, which may have knock on effects for the rest of Anglesey.

URS advise that given this additional demand on already oversubscribed health provision, the council would expect contributions from Land & Lakes to meet the estimated demand and that medical provision on and off site will be adequate to meet demand. Provision and contribution towards medical care such as GPs and dentists will be necessary to accommodate the additional demand posed by the development

### **c) Recreational/Leisure facilities (excluding open space)**

The council's leisure services have confirmed that changing influx of workers / families / residents on the Cae Glas and Kingsland sites will change the local population dynamics and will alter the demand for leisure services and facilities.

URS advise that the impact area already has a current deficit in the provision of leisure centres per person and the proposed development will exacerbate this unless suitable leisure facilities provided by the developer include access to any new facilities on site to the local population or the provision of new facilities outside the proposed scheme location. Facilities offered by the existing leisure centre in the impact area will also face additional demand from the proposed development, particularly from the nuclear new build construction accommodation phase.

Provision of fitness centres within the impact area is also at a deficit compared to the standard provision of people per centre across the rest of Anglesey. Further demand is likely to be created by the proposed development in different phases, particularly during the nuclear new build construction phase and Kingsland permanent residency phase. Therefore a contribution toward the provision of publicly accessible fitness and

sports facilities should be provided off site or suitable facilities within the development should ensure access to the local population and construction workers to alleviate demands placed on existing provision.

Publicly accessible swimming pool provision in the impact area is slightly under provided at the current time. With all phases of development there is likely to be additional demand on swimming facilities. With the absence of specific detail on swimming provision and timing of this element of the development it is difficult to understand the extent to which the applicant is mitigating this impact/additional demand. As such a contribution toward off site provision or access to on-site swimming provision should be included within the mitigation provided by the applicant as part of Section 106 and community benefits package should permission be granted.

The applicant has agreed to provide/contribute towards leisure provision, such provision to be assessed at the time of development.

#### d) Library provision

With the impact area already having a deficit in the provision of libraries per person compared to both the rest of Anglesey and Wales, the proposed development may worsen matters. In particular, the nuclear new build construction accommodation and Kingsland permanent housing phases are expected to place the greatest demands on library provision in the impact area. These phases are expected to increase the number of people per library by 2,112 and 504 respectively, equivalent to 0.85 and 0.62 libraries. The proposed development should therefore contribute towards increasing the capacity of existing facilities in the impact area (Holyhead and Rhosneigr), particularly to account for the demands from the nuclear new build construction accommodation and Kingsland permanent residence phases. Should permission be granted, the IACC will therefore seek financial contribution to provide these additional facilities.

#### e) Emergency services – fire & rescue, police, ambulance

As detailed previously the Betsi Cadwalader University Health Board has not stated that the development will result in additional pressures in terms of health services. Although no written response has been received from North Wales Police, discussions have been held and whilst the police raise no objections to the proposal they have highlighted the need to ensure that any impact created by the development on police services is assessed at the appropriate time and mitigation provided in terms of contributions. North Wales Fire Service has stated that they have no objection in principle to the application.

URS advise emergency services are already constrained in Anglesey and the impact area, and the proposed development may exacerbate this. Whilst the fire and rescue service has access to additional resources on the mainland the two fire and rescue stations in the impact area may not be enough capacity to cater for the additional demand. The police service in Anglesey is already under capacity compared to capacity across England and Wales, though the department are planning to expand their capacity by building a new station in Llangefni. Documentation of ambulance provision in Anglesey indicates that the service already underperforms compared to the rest of Wales, which suggests that the proposed development may place further strain on existing provision.

Further collaboration between Land & Lakes and the emergency services is needed to identify what additional support or capacity is needed for existing provision in Anglesey. In particular, contributions toward ambulance provision and policing (particularly during the Wylfa construction workers accommodation phase) may be needed to minimise the impacts caused by additional demand.

### **Child Social Services**

Social Services have indicated that the scale of workers' accommodation proposed could result in increased demand for child social services and that this would need to be mitigated.

### **Welsh Language**

In accordance with local and national policy the applicant has considered the impact of the development on the Welsh language and culture in the locality, producing a Language Impact Assessment report. The impacts also form part of the wider socio economic impacts of the development.

The assessment has been considered in detail by the council's JPPU Unit who conclude as follows:

- There is a significantly low proportion of Welsh speakers in the area, 42.1% average for London

- Road, Kingsland and Trearddur Wards as opposed an average of 57.2% for Anglesey. The proportion of Welsh speakers in these wards has also declined since 2001 by an average of 11%.
- Whilst Holyhead, compared to other areas on the Island which have a higher proportion of Welsh speakers, may be able to better absorb the increase in the population resulting from the development it is important that the proposed development doesn't exacerbate the decline.
  - The proposed developments are located close to Holyhead, near facilities and services, which is likely to have a positive effect on local shops and services.
  - The mix of different types of housing as well as the provision of affordable housing will benefit local people, particularly younger people and families, by encouraging them to stay in the area, thus potentially contributing to retaining the use of the Welsh language. Affordable housing is considered in more detail elsewhere in the report.
  - It is noted that the presence of nuclear new build construction workers will be temporary and that it is proposed that the accommodation will only be suitable for single workers or those who decide not to move their families to the area. It is therefore reasonable to conclude that this element of the development poses less of a risk in the long term on the Welsh language. Nonetheless some construction workers may reside in the accommodation for relatively long periods. There may be opportunities to raise awareness of the Welsh language and culture within the Cae Glas and Kingsland site when it is used as nuclear new build construction workers' accommodation. There is uncertainty regarding the proportion of temporary workers who will decide to remain in the area following completion of the development, and the subsequent impact upon the Welsh language. There is no guarantee that a proportion of temporary workers will not move permanently to the area thus it is therefore difficult to ascertain the exact impact upon the language and traditions. The benefits derived from the development should be assessed against the potential impact upon the vitality of the Welsh language.
  - Attracting a substantial number of visitors to the area and the impact, both positive and negative, on the Welsh language should be carefully considered. The proposed leisure development provides an opportunity, e.g. through the use of bilingual signs, use of Welsh names, employing bilingual staff presents an opportunity to raise awareness and appreciation of the Welsh language and culture. Failure to take advantage of these opportunities could have a negative impact on the area. Even though the nature of visitors is cyclical in nature, it could be argued that the presence of non-Welsh speaking visitors throughout the year interacting with local communities could potentially contribute to reducing the use of the Welsh language in shops, cafes, etc.
  - If local people have the right set of skills required by employers there is no doubt that the employment opportunities provided by the development will be very beneficial to local people and will help retain the existing population as well as encourage people who had previously moved away in search of employment to return. The proposed development therefore provides a valuable opportunity if the right measures are put in place to help to sustain and improve the status of the Welsh language in the area.
  - If planning consent is given appropriate mechanisms should be used to secure a range of effective mitigation measures to avoid or reduce potential significant negative impacts of the development on the Welsh language e.g. the use of bilingual signs, use of Welsh place names, retention of existing Welsh place names, raising awareness of existing Welsh language courses or contribution to maintaining a Welsh language course, increasing awareness of the Welsh language and culture.

### **Effect on residential amenities**

Policy 1 of the Ynys Mon Local Plan and GP 1 of the Stopped Ynys Mon Unitary Development Plan states the effect on residential amenities and pollution and nuisance problems will be assessed in determining planning applications.

The applicants have provided details of which residential properties will be demolished and retained as part of the proposals.

The ES contains detailed measures for mitigating impacts of construction on the amenities of the area.

Comments have been received from the council's Environmental Services which indicate that the existing and consented uses at the Anglesey Aluminium and Alpo sites will not unacceptably affect the amenities of occupants of the proposed development at Penrhos and Cae Glas.

A detailed assessment of the impacts of the development on residential properties and the caravan site at Lon Trefignath has been undertaken. In addition the applicants have responded directly to an objection letter from a residential property at Trearddur Mews which is next to the proposed cricket pitch.

It is considered that conditions can satisfactorily mitigate impacts on the residential and other amenities following the completion of the development.

### **Open space and public access**

As highlighted in section 6, paragraphs 11.1.3, 11.1.8 and 11.1.11 of PPW are material in relation to the protection and enhancement of public open spaces.

Other considerations include social inclusion, security, accessibility by the disabled and sustainability in terms of accessibility.

The Penrhos site currently amounts to an area of 80 ha which Anglesey Aluminium allows to be used as a coastal park and which it maintains (at an annual cost of approximately £250,000). It is accessible via a public car park on site which Anglesey Aluminium close on a daily basis. There are a number of pedestrian accesses to the site including the coastal footpath which is currently permissive. A public right of way and a national cycle route runs within part of the site.

As part of the proposals the applicants are offering to formalise and maintain public access and improve a reduced area of 29 hectares of publicly accessible land. As part of these proposals there would be improvements to the facilities and the paths, notably the Coastal Path, together with provision of a visitor centre at Beddymynach House.

The Cae Glas site comprises an area of 109ha and is currently inaccessible by the public. As part of the proposals the applicants are also offering a nature reserve on part of this area amounting to 38.1 hectares with controlled public access to this area and the inland sea.

The Penrhos site has been used as a coastal park for a number of years and the reduction in the area available and the loss of woodland will affect the amenities of those who have used the Coastal park. The sentiment and concerns of users of the coastal park are apparent in the objections received and listed in detail in the appendices of this report.

Development of the Penrhos site will therefore conflict with advice in 11.1.11 of PPW which states that formal and informal open spaces should be protected from development.

Penrhos is, however, private land and is only made available to the public as a result of the landowners' goodwill. It is therefore relevant that the proposal is to formalise public access to Penrhos, the provision of improvements in the facilities, including an offer of providing an additional area of restricted public access at the Cae Glas nature reserve. When viewed in this context the offer should be attributed positive weight, as the current position is that it could be closed. Although a reduction in the size of the area will affect the amenity of users, and the community at large, the applicants have offered as part of any approval an obligation which requires the establishment of a community liaison group to manage that part of the Penrhos site where public access will be permitted. In securing access, funding and community involvement in this manner the proposal can be regarded as being in accordance with advice in paragraph 11.1.8 of PPW : being sensitive to the needs of users, attractive, well maintained and protected from crime and vandalism.

Further, as part of the mitigation proposals, the applicant has agreed to provide obligations to assist adjacent communities, notably at Morawelon, and to improve accessibility for people whose mobility is restricted by including accessibility from local communities as part of the green travel plan.

Formalisation of the coastal path can also be attributed positive weight as it enhances the right of way network as a recreational and environmental resource. Positive weight can also be attributed to the proposals to bring forward re-furbish and re-use historic buildings present at the Penrhos site for leisure and tourism purposes in accordance with paragraph 11.1.9 of PPW.

A section of National Cycle Route 8 and Public footpath number 38 go through part of the southern part of the Penrhos site along the route of the old A5 highway which re-routed. These will need to be diverted as they are run along the main vehicular access to the development. No objections are raised by the council's Highways Section to the diversion of either

The formalisation of the coastal path to a public right of way and the enhancement of the informal routes through the publicly accessible areas of the Penrhos site accords with the provisions of the policies described above and can be attributed positive weight.

It should be noted that the proposed development will result in the existing cricket pitch and football ground at Penrhos being lost. However replacement facilities are proposed as part of the Cae Glas development. No objections are raised by Sports Council Wales subject to a requirement that the new facilities to replace the existing football and cricket pitch are of the same size as the existing pitches therefore providing the same opportunities for training and matches. It should be noted that these facilities will be relocated if Penrhos is developed and do not depend upon Cae Glas being used for worker accommodation.

## **Other considerations**

### **Integrated scheme**

The proposal is for a mixed use development that comprises of holiday accommodation and a range of associated uses, i.e. an indoor subtropical water park, spas and saunas, cafes and bars, shops, restaurants, sports facilities and coastal and woodland trails. The evidence submitted by the applicant suggests that it will result in high quality accommodation and facilities. On this basis the application is considered to be an integrated scheme.

The Cae Glas site is also integrated to the Penrhos site forming an extension to it following any construction workers' accommodation use. The Nature Reserve at Cae Glas will proceed as mitigation for the Penrhos leisure uses irrespective of whether the Cae Glas part of the development as workers' accommodation takes place.

### **Listed buildings and conservation**

As noted above, the Stanley Embankment leading to the south of the Penrhos site and the toll house are listed buildings. and an assessment has been undertaken on the impacts on the settings of these structures.

On the Penrhos site itself, the council's Conservation Officer has assessed the proposals in relation to individual listed and other historic buildings. This includes detailed assessment within the parameters of this outline planning application on the setting of listed buildings on the application site. Special regard has been had to the desirability of preserving the buildings and their settings as required by the listed building legislation. In summary the council's Conservation Officer is in principal, generally supportive of this application. Detailed consideration will, however, be required as part of the reserved matters planning applications and the listed building consents. A Conservation Management Plan has been requested prior to the submission of these applications help guide the future management of the site and identify where change might be accommodated without damaging the historic integrity of the site.

The Georgian Group and the Society for the Protection of Ancient Buildings have expressed reservations about the scheme being submitted in outline form. These observations have been considered by the council's Conservation Officer but that their concerns can be addressed by the Conservation Management Plan and planning conditions to ensure that the details are acceptable.

As per detailed comments in the consultation section of this report the Conservation Officer is "...in principal generally supportive of this application which seeks to breathe new life back into the Penrhos Estate" In this regard weight can be attributed to paragraph 11.1.9 of PPW in terms of the development affording an opportunity for the sensitive refurbishment and re-use of historic buildings present on Penrhos. The proposals comprise enabling development preventing deterioration and ensuring regular maintenance and repair via permanent loss of part of the buildings grounds to secure the future maintenance of the buildings.

### **Trees and woodlands**

The local planning authority has assessed the proposals in terms of:

- Potential amenity effects on woodland and trees subject to a Tree Preservation Order
- Potential amenity effects on other woodland and treed areas
- Proposed mitigation

The landscape officer has assessed the impacts on all three sites, and there is 7.3 hectares of woodland potentially affected the main thrust of objections received in terms of the loss of trees relates to the Penrhos site, where there is public access.

Currently 32 hectares of the Penrhos area is wooded, of which 28 hectares is subject to a Tree Preservation



Order. It is estimated that around 30.5 hectares of the wooded area is currently accessible to the public.

Within the Penrhos site 11 hectares of woodland is potentially affected of which 8 hectares will be removed by the development, which is significant. This is mitigated by replanting (4.3 hectares) resulting in a net loss of around 3.7 hectares. New planting will take effect over a long timeframe. Losses to the Tree Preservation Order are limited, and the trees will continue to provide an important screen to existing development on the site and screen new development. At points the effects on the public amenity value of the TPO woodland will be greater e.g. from the coastal footpath where the buffer is weakened by the proposed development, and from retained internal routes bordering the proposed development.

Natural Resources Wales (NRW) have reviewed their Ancient Woodland Boundary in the light of evidence submitted by the applicant. This has led to a reduction of the area as shown on their Ancient Woodland Inventory (AWI) 2012. Ancient Woodland areas affected by the development are restricted to Hub Lodges near the Hub Entrance, and Estate Cottages north of the Quillet. The access road to the southern woodland parking of 270 spaces would be through an area included in the NRW AWI. The area as assessed by the Council to be affected is 0.5 ha which is less than 8% of the total area as included on the AWI. It is considered that the issue can be satisfactorily mitigated in the obligations and conditions recommended.

SSSI - The Ecological Advisor and NRW are content that the proposals will not affect the Beddymnach SSSI directly or indirectly. The proposal will produce positive benefits in allowing public access and will deal with leachate from the former Anglesey Aluminium tip which can be weighted positively in ecological terms, which are considered further below

### **Ecology**

The Ecological Advisor and NRW are content subject to appropriate mitigation as detailed in the consultation section of this report. Protected species such as bats, badgers are affected by the proposed development, but subject to mitigation recommended no objections are raised on these grounds.

The proposed nature reserve at Cae Glas and management of natural resources in the Penrhos Coastal Park could enhance biodiversity interests in the area. Other ecological material consideration which can be attributed positive weight include the managed heathland area at Cae Glas and the change in the proposed in terms of species planted will mean that in long term habitats such as that of the red squirrel will be safeguarded and in the long term become higher quality.

### **Flood risk**

The development complies with paragraph 6.2 of TAN 15 and tests listed in section 6. No objection has been made by NRW regarding flood risk.

### **Highways etc.**

In term of highway, parking and pedestrian safety, consultants employed by the council have confirmed that the roads serving the development have adequate capacity. As part of the proposals, an outline Transport Implementation Strategy/Green Travel Plan was submitted which is considered acceptable subject to the conditions/section 106 obligations proposed.

### **Archaeology**

The advice in PPW states that where nationally important archaeological remains are likely to be affected by development, there should be a presumption of preservation in situ. In the case of lesser remains, the importance of the archaeology needs to be weighed with other considerations such as need. PPW also deals with the requirements on archaeological assessments and investigation.

As will be noted from the consultation response section of this report, Gwynedd Archaeological Planning Services have concluded that, although site investigations have been carried out, such investigations are limited. However, they consider that conditions can be attached in respect of all three of the sites subject to the planning application to ensure that appropriate mitigation is undertaken prior to and during the proposed development. It should be noted that in respect of Kingsland, the archaeological evaluation has identified a later prehistoric settlement site within development area. However, the significance of this site is not fully understood, although it is stated that if well preserved this could be a site of at least regional if not national importance. This site can only be mitigated by either preservation in situ or large scale archaeological excavation via conditions. This approach is considered acceptable in relation to the policy advice and should

permission be granted suitable conditions/section 106 obligations will be imposed.

### **Scheduled Ancient Monument**

The Cae Glas site contains the Trefignath Burial Chamber. Policy requires that SAMs and their settings remain intact.

Cadw has confirmed that the proposals should not have any adverse impact upon the SAM. Cadw indicates that it has previously advised of the need to maintain open space around the scheduled ancient monument and to ensure indivisibility between Trefignath Burial Chamber and the scheduled ancient monument at Ty Mawr Standing Stone to the north west and that these considerations have been met. There is a substantial area of open ground maintained around the burial chamber and its landscape prominence on the small natural rise has not been compromised in Cadw's opinion.

### **Prematurity**

The council has considered whether, in relation to the legacy housing proposals at Kingsland, the proposals could be considered as premature. In this regard, PPW notes that questions of prematurity may arise where an LDP is in preparation but the plan has not yet been adopted. It advises that in such circumstances it may be justifiable to refuse planning permission on the grounds of prematurity for proposals which are individually so substantial, or whose cumulative effect would be so significant, that to grant permission would predetermine decisions about the scale, location or phasing of new development which ought properly to be taken in the LDP context (see paragraph 2.6.3). However, it notes that refusal will rarely be justified except in cases where a development proposal goes to the heart of the plan. It also notes that a refusal on prematurity grounds will seldom be justified where the plan is at the pre-deposit plan preparation stage because of the lengthy delay which this would impose in determining the future use of the land in question. It is not considered that the housing proposals at Kingsland go to the heart of the plan: the proposals at Kingsland will, if granted, not be implemented (if at all) for many years and. Furthermore, in the case of the JLDP, this is at a very early stage (there is no draft plan yet). As such, officers do not consider the proposals to be premature and to prejudice the JLDP process.

## **8. Summary and Conclusions**

The application covers three sites: Penrhos, Cae Glas and Kingsland.

It is intended that Penrhos be developed as a leisure village comprising up to 500 new leisure units including new lodges and cottages with an essential hub building and associated facilities. It is intended to be an all year round facility. The application primarily is in outline save for a small part where full permission is being sought in relation to the changes of use of a number of the listed buildings on the site.

Cae Glas is proposed to be an extension to the Penrhos leisure village, but with the Penrhos site containing the main facilities. The site at Cae Glas will contain up to 315 lodges. However, it is intended that this site and the lodges will firstly be used for accommodation for nuclear workers in association with the construction of Wylfa B.

It is intended that Kingsland will be used for the erection of up to 360 new residential dwellings. The buildings are initially to be used as temporary construction worker accommodation in association with Cae Glas and it is only following this use that it will be converted into housing.

The application is proposed as one package of developments due to the linkages between the sites. Central to the business case for the tourism use is a coastal location and therefore Penrhos is considered by the applicant to be a suitable site for the leisure village. The Cae Glas extension will depend upon Penrhos for its facilities and for coastal access. In terms of the worker accommodation, Cae Glas and Kingsland are linked in that Cae Glas will provide the hub for both sites. An important element of the proposals is that the worker accommodation on Cae Glas and Kingsland will need to take place in order for either of the legacy uses to be capable of implementation. That is to say that if Cae Glas and Kingsland are not used in the first instance for temporary worker accommodation then neither the extension to the leisure village at Cae Glas nor the residential development at Kingsland will be permitted to take place. Should permission be granted there would be planning obligations and/or conditions to ensure this occurs.

The applications represent a departure from the development plan. However it is to be noted that the Gwynedd Structure Plan and Ynys Mon Local Plan are both dated and it is considered that weight should be attributed to the Stopped UDP as the more up to date document representing the local planning authority's

most recent statement of planning policy. In respect of the UDP, Penrhos is an unallocated site in countryside and part of the Cae Glas site is allocated for employment whilst the remainder is in countryside. Most of the Kingsland site is within the Holyhead settlement boundary, but it is allocated for leisure uses. It is not, however, considered that permitting the proposals will compromise either employment or leisure provision in the area.

It is considered that a need has been demonstrated for the developments. There is a requirement for workers accommodation in relation to the construction of Wylfa and that need is established through national planning policy, and the Council's Position Statement on construction worker accommodation recognises a requirement for provision such as is proposed in the application. It is also considered that there is a need for the leisure elements of the development recognising the objectives to boost tourism which, coupled with the economic development benefits it is considered that the proposals will bring, create a compelling case for the development. It is acknowledged that the Kingsland housing proposal is not of itself based on an identified need (indeed there is currently a surplus of housing in the county), but provision of such housing is recognised as integral to the site first being used for workers accommodation: where buildings will be constructed and therefore some type of legacy use is important to ensure the proposals are viable and to ensure that the site is not simply abandoned after such a use. It is also acknowledged that provision of such housing will fall well outside of the current development plan period and 5 year housing supply timeframe. On this basis, assuming permission is granted, the Kingsland consent can be factored into decisions on other housing proposals at the appropriate time. It is not considered that the emerging UDP will be compromised. Overall, therefore, it is considered that a need has been demonstrated for the proposed developments.

One of the key elements of the proposals which is considered weighs heavily in their favour is the economic development benefits. Economic development is a factor which is stated in Government policy (PPW) to be given significant weight in decision making. As will have been noted from the main body of the report, the economic benefits that will result from the development proposals are significant and the Council agree with the applicant that they are likely to provide a "step change in the economy of the Isle of Anglesey". The proposals will create a significant number of job opportunities; they will assist in regenerating the local economy and promoting growth and regeneration. In terms of the tourism and worker accommodation element the economic benefits are significant. It is unlikely that the economic development relating to the new housing aspect will be as great but there clearly will be positive economic benefits from the provision and occupation of new accommodation.

Whilst a need may have been demonstrated and the economic developments of the proposal are significant, these do need to be balanced against the other policies contained within the development plan, Stopped UDP and PPW which are aimed at protecting the environment against inappropriate development.

In this regard sustainability is important and provides a golden thread running through current Welsh Government policy. However, it is considered that the location of the developments are acceptable being within and adjacent to Holyhead, which is the largest settlement on Anglesey and has a wide range of facilities, services and transport links.

An important consideration is the AONB, where all three sites are situated. Regard must be had to the purpose of conserving and enhancing the natural beauty of the AONB. It is recognised that major developments should not take place in an AONB except in exceptional circumstances and regard must be had to paragraph 5.5.6 which requires the applications to be assessed on the basis of need and impact, the cost and scope of providing the development outside the AONB or meeting the need in another way, and looking at any detrimental effect on the environment and whether this can be moderated.

The national need for the development has been considered and concluded to exist in relation to the tourist/leisure and worker accommodation elements of the proposal and, on balance, this is considered to provide the national need required in terms of paragraph 5.5.6. The application is supported by reports which indicate that refusing permission would have major adverse effects in terms of the local economy. The applicants have undertaken an alternative site assessment in relation to the worker accommodation and tourism proposals and, based on criteria required to deliver worker accommodation, the need for a coastal location for the tourism development and the fact that the proposals are integrated, it is considered that there are no other suitable sites outside the AONB which would meet the stated needs and accommodate the various uses. It is acknowledged that there are alternative housing sites available and that Kingsland does not, of itself, meet this element of the test, but when viewed in the context of the overall proposals it is considered that this aspect does not outweigh the tourism and worker accommodation element. Finally, in terms of effect on the environment and landscape, NRW have been closely consulted in respect of the proposals and a number of measures are proposed in order to address their concerns. Furthermore the Council's landscape officer, whilst recognising that there will be both positive and negative impacts to the

development, is not suggesting permission should be refused on landscape grounds. It is noted that NRW have concerns over the overall impact of the development on the AONB. It is also noted that they are not objecting and it is considered that provided the mitigation is undertaken, which will be subject to a section 106 agreement and appropriate conditions, then the effect on the environment can be moderated appropriately and the AONB qualities preserved and enhanced.

Policies in relation to green wedge and un-developed coast are relevant in connection with Cae Glas and Penrhos. Part of the Cae Glas site is designated as green wedge however a significant part of the green wedge is to be retained and maintained and a 38 hectare nature reserve is to be provided. The leisure and sport uses on the site are not considered to conflict with green wedge policies, and, whilst an erosion of part of the green wedge will occur, there will still be an appropriate buffer, which is the stated reason for this green wedge designation. Therefore, whilst it is in only very exceptional circumstances that permission should be granted for development in the green wedge, it is considered there are sufficient considerations here which outweigh the harm. In terms of the un-developed coast, policy requires a coastal local to be justified. In this regard, the tourism proposal at Penrhos and subsequently Cae Glas are centred around a coastal location, with this aspect considered to be the USP for a tourist destination of this type (as opposed to a Centre Parc type tourist facility which is located in forest type surroundings). There are concerns in relation to the un-developed coast, particularly in respect of the headland at Penrhos, but they too need to be balanced with the other considerations including the economic ones.

Considerations in relation to open space and public access are also relevant. There will be an effect on the area on which access to Penrhos will be available in that following the built development this will be reduced. However it is significant that under the current arrangements such access is permissive and therefore could be withdrawn at any time. The proposals contain clear proposals to extend public access on a more formal basis including the dedication of public footpaths including the coastal path. Furthermore, in respect of Cae Glas where the open space is currently inaccessible, a nature reserve of 38 hectares will be made available together with a visitors centre. It is therefore considered that the proposals provide a significant benefit in respect of public access and open space.

There are a number of other considerations including that the proposals are considered to be integrated, flood risk, ecology, impact on the scheduled ancient monument, the SSSI and listed buildings. As will have been seen from the main report, these have all been assessed and it is considered that none of these provide sufficient justification for refusing the proposals.

There is a concern in relation to archaeology that the site may be one which contains nationally significant remains. In this regard discussions have taken place with Gwynedd archaeological planning services and it is proposed that conditions are attached in order to safeguard this eventuality and to deal with the archaeological approach to the site generally. Whilst the applicant could be requested to undertake further site investigation, this is not being proposed by Gwynedd archaeological services and it is considered that the imposition of conditions is an appropriate way of dealing with this aspect.

It will be noted from the report that there will be a number of impacts caused by the development, particularly from a socio-economic perspective. These include education, health, impact on recreational and leisure facilities, library and emergency services. Assessment has been taken in relation to all of these areas and it has been agreed that these impacts can be mitigated through the use of conditions and section 106 obligations and this has been agreed by the applicant. In this regard it is proposed that an assessment is undertaken at the time of development of each phase in order to determine the impact which the development has in relation to those services and facilities. Suitable provision and/or contributions can then be made based on that assessment. There is also likely to be an impact on the Welsh language which, again, the applicant is proposing to safeguard through a number of proposals which will be captured in the conditions and section 106 agreement. It is also considered significant that, in relation to the housing proposals at Kingsland, 50% of the dwellings will be made available as affordable housing.

Taking all of the above elements into account, it is considered that whilst there are impacts in relation to AONB and environmental concerns generally, these are outweighed by the need and positive elements that the development will bring, particularly from an economic perspective, and it is therefore recommended that planning permission is granted.

## 9. Recommendation

That the application is referred to the Welsh Government for a period of 21 days in accordance with The Town and Country Planning (Notification) (Wales) Direction 2012 with a recommendation that the local planning authority are minded to **permit** the planning application subject to:

(a) the applicant entering into a section 106 Agreement the draft heads of terms of which are set out below; and

(b) planning conditions covering the matters set out below;

That the Head of Planning Services be granted delegated authority to negotiate the terms of the section 106 Agreement and deal with the matters in a) and b) above by condition or section 106 as is considered appropriate by the Head of Planning Services.

## **10. Heads of Terms for the Section 106 Agreement**

The following represents main heads of terms of a s106 agreement. These have been discussed in principle with the applicant but will require further discussion and refinement in order to agree the final package of measures and embody these in an enforceable and legally compliant agreement:

1. Provision/financial contributions towards any additional demand identified following assessment of school places created by the Kingsland housing legacy development. Demand to be assessed prior to implementation of the relevant phase and provision/contribution calculated against an agreed formula.
2. Provision/financial contributions towards any additional demand identified following assessment for medical care or services created by the nuclear worker accommodation or Kingsland housing developments, such as GPs and dentists. Demand to be assessed prior to implementation of the relevant phase and provision/contribution calculated against an agreed formula.
3. Provision/financial contributions towards any additional demand identified for publically accessible fitness and sports facilities either off site or within the development. The amount and timing of such provision/contributions to be assessed prior to implementation of the relevant phase and calculated against an agreed formula.
4. A contribution if required towards improvements to off-site swimming facilities or a contribution towards existing facilities to accommodate any additional demand created by the Cae Glas workers accommodation and Kingsland. The demand to be assessed prior to implementation of the relevant phase and the amount of contributions to be calculated against an agreed formula.
5. A financial contribution, if required following assessment, towards increasing the capacity of existing library facilities in the impact area, particularly to account for the demands from the nuclear worker accommodation and Kingsland housing development and calculated against an agreed formula.
6. Provision/financial contributions towards any additional demand/impacts identified on the Police from the nuclear workers accommodation or other phases of development. The amount and timing of such provision/contributions to be assessed prior to implementation of the relevant phase.
7. Provision /financial contributions towards any additional demand/impacts identified on the Ambulance Service/Fire service from the nuclear workers accommodation. The amount and timing of such provision/contributions to be assessed prior to implementation of the relevant phase.
8. Provision/financial contributions towards any additional demand identified for child social services created by the nuclear accommodation at Cae Glas and Kingsland. The amount and timing of such provision/contributions to be assessed prior to implementation of the relevant phase and calculated against an agreed formula.
9. The provision of free parking and public access in Penrhos as outlined on the application, subsidised access to Cae Glas and free access to Kingsland. The visitor centre to be open to the public free of charge. Space to be provided in the visitor centre for the council to use as a visitor learning facility to further the conservation and enhancement of the AONB. Toilets at Penrhos to be maintained until the toilets are relocated to the visitor centre. Provision of open space and play equipment (and its maintenance) in relation to the Kingsland residential use.
10. Relocation of the cricket pitch and football ground at Penrhos to Cae Glas. Obligations to cover the timing, specification, management, access and parking arrangements and the use of the facilities.
11. Permissive path along coastal edge of Penrhos within application site to be dedicated as public right of

way and maintained by applicant. Sustrains 8 cycle route/public footpath 38 to be rerouted to ensure continual access provided.

12. Leisure facilities at Penrhos to be open to the public on a Community Access Programme with hourly/daily and seasonal tariffs to be agreed with the applicant.
13. Compensatory habitat and species enhancement areas and measures, monitoring and future management including ensuring appropriate funding is in place.
14. Restriction on the construction worker accommodation at Cae Glas and Kingsland to ensure that they are not occupied by families and that all facilities are to be provided centrally.
15. Restriction of the accommodation at Penrhos and the legacy accommodation at Cae Glas to holiday use only.
16. Green Travel Plan/TIS to be required to include provision of a shuttle bus link to Holyhead town centre and key tourist nodes. Travel plan to relate to temporary and legacy uses, including general public use of Penrhos, including shuttle bus/coach parking and turning. Provisions to monitor the operation of the GTP/TIS and to contain appropriate remedies for non-compliance (financial or other requirements as appropriate).
17. Provision of passing places on Lon Trefignath on highway land/land in control of applicant. Provision of bus stop facilities. Applicant to enter into section 278 Agreement to deliver these.
18. Provisions in relation to local employment and supply chain including providing and implementing a local employment and training plan covering local recruitment and training, providing a local sourcing strategy to establish a commitment to work with local businesses and financial contribution towards the funding of apprentices during construction and operation.
19. Payment of Council's reasonable costs in relation to making new TPOs within the application site.
20. Creation of a liaison group to engage with the community and to input into aspects of the development affecting the community, such as the publically accessible areas.
21. Affordable housing provision on Kingsland to be 50%. Mix and tenure to be assessed at time of provision.
22. Housing of Kingsland to achieve Code for Sustainable Homes Level 4. BREEAM Excellent to be achieved on non-residential buildings. Holiday lodges to comprise buildings and achieve a minimum of Sustainable Homes Level 3. 10% of energy needs of development to be provided on site and 10% target reduction in CO2 emissions.
23. Establishment of a conservation management board for considering and implementing the conservation management plan.
24. Restriction on leisure development as Cae Glas and Housing at Kingsland to only proceed if the sites are first used for providing construction worker accommodation in connection with Wylfa B.
25. Restrictions to ensure linkage between Penrhos and Cae Glas in terms of sharing facilities. Similar linkage between Cae Glas and Kingsland for worker accommodation facilities.
26. Provisions to ensure that following cessation of worker accommodation uses at Cae Glas and Kingsland, the sites are converted to the legacy leisure and housing developments respectively or restored to former condition. Financial contribution to be provided per property per annum to provide a fund to ensure appropriate refurbishment of the buildings takes place to allow the legacy uses.
27. Provision of dual language signage and visitor information boards throughout the development for both public and private areas at Penrhos. Welsh language training to be made available to employees. Kingsland to provide dual language street names. Measures to attract Welsh speaking employees to the leisure developments.
28. General provisions to be included such as meeting the Council's costs in drafting and negotiating the Agreement, monitoring costs provision, service of notices, carrying out of assessments as required to

the satisfaction of the LPA, etc.

29. Provisions in relation to the tourism proposals to require suitable collaboration to be undertaken and initiatives put in place to ensure the development is integrated with Anglesey's tourism industry. This will include requirements to consult relevant stakeholders, undertake marketing initiatives, ensure facilities are provided at Penrhos to accommodate local businesses to ensure tourism in the area is promoted and protected from the impacts of the development and to ensure appropriate provision/funding is available to facilitate the above and monitor impacts.
30. Highway works/financial contribution, if required following a cumulative assessment of the development with other relevant major developments, to mitigate any impacts identified on the highway from the nuclear workers accommodation. Such assessment to take place prior to occupation of the workers accommodation development.
31. Cae Glas nature reserve and visitor centre to be provided and maintained prior to the completion of 60% of Penrhos private open space/development area or 30 lodges at Penrhos (whichever is the sooner). Details of public access and parking arrangements to be provided in accordance with a timetable to be agreed in writing with the Local Planning Authority.
32. Provisions to ensure that suitable archaeological investigation in relation to all three sites has been undertaken and appropriate measures undertaken to preserve and or record as appropriate.

## **Planning Conditions**

### **Outline Planning Conditions – Applicable to all 3 sites Outlined in Red on the Plan Enclosed as Appendix 6**

1. Details of the appearance, landscaping, layout and scale (hereafter called “the reserved matters”) for a phase of development (or part thereof):
  - The proposed leisure development at Penrhos Coastal Park
  - The “temporary nuclear construction workers accommodation” at Cae Glas
  - The “temporary nuclear construction workers accommodation” at Kingsland shall be submitted to and approved in writing by the Local Planning Authority before any development in that relevant phase is commenced. “temporary nuclear construction workers accommodation” means workers engaged solely in the development of a new nuclear power station on the site identified in Volume II of NPS EN6 at “Wylfa”
2. The first application for the approval of reserved matters shall be made to the Local Planning Authority not later than the expiration of 3 years beginning with the date of this permission. Subsequent application(s) for the approval of reserved matters shall be made to the Local Planning Authority not later than the expiration of 10 years beginning with the date of this permission.
3. The development hereby permitted shall commence not later than whichever is the later of the following dates:
  - The expiration of 5 years from the date of the grant of this permission; or
  - The expiration of 2 years from the date of the approval of the first reserved matters application to be approved
4. Prior to commencement of the refurbishment work to convert the temporary nuclear construction workers accommodation at Cae Glas to the leisure development hereby approved, full details of the refurbishment work (including details of the landscaping and layout) shall be submitted to and approved in writing by the Local Planning Authority.
5. Prior to commencement of the refurbishment work to convert the temporary nuclear construction workers accommodation at Kingsland to the residential development hereby approved, full details of the refurbishment work (including details of the landscaping and layout) shall be submitted to and approved in writing by the Local Planning Authority.
6. Development is to be carried out substantially in accordance with the following approved plans:

Drawing Title:	Drawing Number:	Revision:
Red Line Boundary – Composite Plan	PL1114.P.RL100	C
Penrhos Parameter Plan - Land Use	PL1114.P.PP101	C
Cae Glas - Parameter Plan - Land Use	PL1114.CG.PP101	B
Kingsland Parameter Plan - Land Use	PL1114.K.PP101	B
Building Heights Penrhos	908	I
Building Heights Cae Glas	911	E
Building Heights Kingsland	909	C
Penrhos Parameter Plan - Advanced Planting	PL1114.P.PP102	C
Cae Glas – Parameter Plan - Advanced Planting	PL1114.CG.PP102	C
Kingsland Parameter Plan - Advanced Planting	PL1114.K.PP102	C
Proposed Roundabout Access	90145_TA_100	E
Cae Glas Access	90145/TA101	A
Kingsland Road Proposed Layout – Option A	90145/002	B

7. Reserved matters applications for any part of the development hereby permitted shall be preceded by sufficient information to enable the Local Planning Authority to undertake a Screening Opinion to identify any areas of the Environmental Impact Assessment approved as part of this permission that may need to be updated as part of the submission of reserved matters applications.
8. A public realm strategy for each phase of development detailing the materials, treatments, hard and soft



landscaping and the management of the public areas for that phase shall be submitted to and approved by the Local Planning Authority.

9. Stand-off distances from utilities infrastructure for each phase of the development shall be submitted to and approved by the Local Planning Authority for that phase of development.
10. A Construction Environmental Management Plan for each phase of the development shall be submitted to and approved in writing by the Local Planning Authority for that phase of development.
11. Prior to commencement of development, a Construction Traffic Management Plan for each phase of the development shall be submitted to and approved in writing by the Local Planning Authority for that phase of the development and the approved measures shall be implemented during the entirety of the construction period except in so far as any variation to it has been approved in writing by the Council. The Plan shall include as a minimum:
  - (i) the means of transportation of plant, equipment and materials associated with the construction of the development and access to the site from the highway.
  - (ii) specification of haul route(s) and of any temporary signage to be provided to identify the route for construction traffic and promote its safe use;
  - (iii) identification of the routing strategy and procedures for the notification and conveyance of any indivisible "out of gauge" loads. This includes any necessary measures for the temporary protection of carriageway surfaces; for the protection of statutory undertakers' plant and equipment; and for the temporary removal of street furniture;
  - (iv) description of the arrangements to be made for on-site parking for personnel working on the Site and for visitors; and
  - (v) proposals for communicating information relating to the above plan to the Council.
12. A Wildlife Management Plan for each phase of the development shall be submitted to and approved in writing by the Local Planning Authority for that phase of development.
13. As part of reserved matters applications for a phase of development, follow-up ecology surveys for that phase of development, shall be submitted to the Local Planning Authority for approval.
14. Submission of a Soil Management Plan for each phase of the development detailing the soil excavation, handling and storage shall be submitted to and approved by the Local Planning Authority for that phase of development. Each Soil Management Plan should be developed and undertaken in accordance with the Environment Agency Pollution Prevention Guidelines (PPG1), and should identify strategies for restoring areas disturbed during construction.
15. Details of acoustic barriers and fencing for each phase of the development shall be submitted to and approved in writing by the Local Planning for that phase of development.
16. Details of refuse storage for each phase of the development shall be submitted to and approved in writing by the Local Planning Authority for that phase of development
17. Details of the energy strategy for each phase of the development shall be submitted to and approved in writing by the Local Planning Authority for that phase of development
18. As part of reserved matters applications for a phase of the development, archaeological specification for that phase of development shall be submitted to the Local Planning Authority for approval
19. As part of reserved matters applications for a phase of the development, detailed design for foundations and other groundwork's, earthwork landscaping (e.g. bunding), and a method statement for construction in areas of archaeological potential for that phase of development shall be submitted to the Local Planning Authority for approval. The approved details shall be implemented in full and adhered to in in the implementation of the development.
20. Full details of external materials for each phase of the development including colours shall be submitted to and approved in writing by the Local Planning Authority for that phase of development.

21. An AONB Management Strategy for each phase of the development shall be submitted to and approved in writing by the Local Planning Authority for that phase of development.
22. Advanced planting details for each phase of the development shall be submitted to and approved in writing by the Local Planning Authority for that phase of development. The approved details shall be implemented in accordance with an agreed timetable. The proposed site layout will be informed by a detailed survey to BS 5837:2012 Trees in relation to design, demolition and construction – Recommendations. (The survey will include details of tree categorisation, root protection areas, proximity of structures to trees, Arboricultural impact assessment, Tree protection plan, new planting design and associated landscape operations, Arboricultural method statement and site monitoring.
23. Full details of existing and proposed ground levels (including details of proposed slab levels and ground modelling) for each phase of the development shall be submitted to and approved in writing by the Local Planning Authority for that phase of development.
24. Full details of construction specifications of any engineered gradients, batters, bunds all retaining structures and bridges and any associated engineering works which shall also be accompanied by a suitably qualified engineers report for each phase of development shall be submitted to and approved in writing by the Local Planning Authority for that phase of development.
25. Full details of lighting for each phase of the development shall be submitted to and approved in writing by the Local Planning Authority for that phase of development.
26. No development of any phase shall commence until detailed designs for foul surface water and land drainage schemes for the development of that phase has been submitted to and approved in writing by the local planning authority. The approved schemes shall be completed before the occupation of any part of the development on that phase. The schemes to be submitted shall show foul drainage being connected to the public sewerage system and shall on a phased manner include for the connection of all existing buildings/dwellings on the sites and on the existing public toilet at Penrhos (as defined on Plan Ref: PL1114.P.RL100) to the public sewer.
27. Details of SuDS to be submitted pursuant to Condition 29a above shall be based on the drainage principles set out in the Flood Consequences Assessment Report (Capita Symonds, 2012). Where a SuDS scheme is to be implemented for any phase of development, the details for that phase shall be submitted to the LPA for approval and shall:
  - i. Provide information about the design storm period and intensity, the method employed to delay and control the surface water discharged from the site and the measures to be taken to prevent pollution of the receiving groundwater and/or surface waters;
  - ii. Specify the responsibilities of each party for the implementation of the SuDS scheme, together with a timetable for that implementation; and
  - iii. Provide a management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public authority or statutory undertaker or other arrangements to secure the operation of the scheme throughout its lifetime.
28. Land drainage run-off shall not be permitted to discharge, either directly or indirectly, into the public sewerage system.
29. No surface water shall be allowed to connect, either directly or indirectly, to the public sewerage system unless otherwise approved in writing by the local planning authority.
30. Foul and surface water discharges shall be drained separately from the application sites.
31. A site investigation scheme for any phase based providing information for a detailed assessment of the risk to all receptors, an options appraisal and remediation strategy giving full details of the remediation measures required and their implementation shall be submitted to the LPA prior to commencement of development of that phase.
32. No occupation of any phase of the development affected by contaminants identified in (31) until a verification report demonstrating completion of the works set out in the approved remediation Strategy for that phase of development.

33. No development shall take place at each phase until a long term monitoring and maintenance plan for contaminants identified in (31) for that phase, including any contingency measures, is submitted to the LPA. On completion of the monitoring a requirement for a final report confirming that remedial targets have been achieved should be submitted to the LPA.
34. Prior to commencement of development a scheme for each phase of the development shall be submitted to and approved in writing by the Local Planning Authority for that phase of the development giving full engineering details of the access from each phase of the development onto the highway. The scheme shall include as a minimum details of all vehicular and pedestrian accesses including pedestrian crossing facilities, construction materials, levels, gradients, surface water drainage, lighting and landscaping, including all necessary and proposed alterations to the existing highway. The works covered by the scheme shall be carried out in accordance with the approved scheme prior to the use of the development.
35. Development not to be occupied until visibility splays have been provided in accord with details to be submitted, and thereafter retained and kept free from obstruction.
36. Phasing plan to be submitted as part of the reserved matters applications; development shall thereafter be implemented and completed in accord with the details to be approved under the provisions of this condition, unless otherwise agreed with the LPA.
37. Vehicular access to be completed prior to the commencement of that phase of the development to which it relates unless otherwise approved in writing by the local planning authority.
38. Existing traditional agricultural landscape features (including hedges, cloddiau and walls) to be retained as part of the reserved matters.
39. Existing path and roadside verges including walls to be retained as part of the reserved matters.

**Outline Planning Conditions – Applicable to Penrhos Hatched in Green on the Plan Enclosed as Appendix 6**

40. A Conservation Management Plan for the Penrhos Estate buildings and gardens shall be submitted to and approved in writing by the Local Planning Authority
41. A Demolition Method Statement for Penrhos Coastal Park shall be submitted to and approved in writing by the Local Planning Authority.
42. Full details of the proposed football and cricket pitches at the application site to replace the existing provision at Penrhos Coastal Park shall be submitted to and approved in writing by the Local Planning Authority.
43. A Flood Management Plan for Penrhos Coastal Park shall be submitted to and approved in writing by the Local Planning Authority.
44. A Culvert and Pipe Management Plan for Penrhos Coastal Park shall be submitted to and approved in writing by the Local Planning Authority.
45. A SSSI Strategy for Penrhos Coastal Park shall be submitted to and approved in writing by the Local Planning Authority.
46. A 25 year Woodland Management Plan for Penrhos Coastal Park shall be submitted to and approved in writing by the Local Planning Authority. The Plan will document the process of consultation (with a range of statutory bodies, non-statutory bodies and the public or/and? Conservation Management Board) and formulation of the plan's objectives and outputs. The plan shall include a 5 yr. schedule of works which will form the basis of consent for works to trees protected by a TPO and those outside the TPO. The plan shall be updated on a 5yr. basis and the schedule of works form the basis of subsequent TPO applications or felling licence applications to NRW. The management plan shall include a planting scheme for all new tree planting on all sites as outlined by the Advanced Planting Plans and Landscaping Operations identified by the BS 5837 survey above. The plan shall distinguish between areas publically accessible and private land. The plan will need to accommodate and show that the

multiple objectives of tree replacement, biodiversity enhancement and public and private amenity (screening and structural planting) are met. The plan should confirm areas to be commenced as advance planting before a reserved matters application. The plan shall refer to and complement the Wildlife Management Plan

47. Full details of badger sett creation and closure at Penrhos Coastal Park shall be submitted to and approved in writing by the Local Planning Authority.
48. Full details of the Energy Centre specifications which shall include a full air quality assessment for CHP Plants and chimney heights calculations in terms of pollutants at the nearest receptors at Penrhos Coastal Park shall be submitted to and approved in writing by the Local Planning Authority.
49. Details of the gabion repairs at Penrhos Coastal Park, as defined in the Flood Consequences Assessment (Capita Symonds, 2012), shall be submitted to and approved in writing by the Local Planning Authority.
50. Bluebell & Ground Flora Translocation Strategy at Penrhos Coastal Park shall be submitted to and approved in writing by the Local Planning Authority.
51. Location and details of pond creation at Penrhos Coastal Park shall be submitted to and approved in writing by the Local Planning Authority.
52. A scheme to ensure that the Coastal Path remains usable by pedestrians during the construction period shall be submitted to and approved in writing by the local planning authority. The details approved under the provisions of the condition shall be maintained in the duration of the construction of the development hereby approved.
53. Details of all private access ways to be submitted to and approved in writing by the LPA.
54. Details to be provided as part of the reserved matters of all parking and turning areas these shall be laid out prior to the occupation of the development and thereafter retained for these purposes.
55. Details of surface water disposal from the private access ways and parking areas to include full specification of fuel interceptors which shall be provided at an appropriate capacity to be submitted to and approved in writing by the Local Planning Authority.

**Full Planning Conditions - Applicable to Existing Buildings at Penrhos Outlined and hatched in Turquoise on the Plan Enclosed as Appendix 6**

56. The change of use hereby permitted shall commence before the expiration of five years from the date of this permission.

**Informative**

1. The planning permission hereby granted for the proposed change of use does not authorise any changes to the external appearance of the buildings.
2. If works are proposed to the external appearance of the buildings then full planning permission may be required.
3. If internal and external works are proposed to a building which is listed, then listed building consent shall be required

**Outline Planning Conditions – Applicable to Cae Glas Hatched in Yellow on the Plan Enclosed as Appendix 6**

57. No development at Cae Glas shall commence until a programme of site investigation as defined in the Preliminary Sources (Desk) Study and Ground Risk Assessment (Capita Symonds, 2012) has been undertaken and a remediation strategy has been submitted to and approved by the Local Planning Authority.
58. No development at the Cae Glas Nature Reserve shall commence until a Statement for the Operation of the Nature Reserve has been submitted to and approved in writing by the Local Planning Authority.

59. Full details of the Energy Centre specifications at Cae Glas) shall be submitted to and approved in writing by the Local Planning Authority.
60. A SSSI Strategy for Cae Glas shall be submitted to and approved in writing by the Local Planning Authority.
61. Full details of badger sett creation and closure at Cae Glas shall be submitted to and approved in writing by the Local Planning Authority.
62. A 25 year Woodland Management Plan for Cae Glas shall be submitted to and approved in writing by the Local Planning Authority. The Plan will document the process of consultation (with a range of statutory bodies, non-statutory bodies and the public or/and? Conservation and Management Board) and formulation of the plan's objectives and outputs. The plan shall include a 5 yr. schedule of works which will form the basis of consent for works to trees protected by a TPO and those outside the TPO. The plan shall be updated on a 5yr. basis and the schedule of works form the basis of subsequent TPO applications or felling licence applications to NRW. The management plan shall include a planting scheme for all new tree planting on all sites as outlined by the Advanced Planting Plans and Landscaping Operations identified by the BS 5837 survey above. The plan shall distinguish between areas publically accessible and private land. The plan will need to accommodate and show that the multiple objectives of tree replacement, biodiversity enhancement and public and private amenity (screening and structural planting) are met. The plan should confirm areas to be commenced as advance planting before a RM application . The plan shall refer to and complement the Wildlife Management Plan
63. As part of reserved matters applications for Cae Glas, details of the bund along the site frontage with the A55 shall be submitted to the Local Planning Authority for approval. Details shall take account of advance planting.
64. Location and details of pond creation at Cae Glas shall be submitted to and approved in writing by the Local Planning Authority. Pond creation shall be informed by objectives of the Woodland and Wildlife Management Plans.
65. Prior to the use of Cae Glas as workers accommodation associated with the development of a new nuclear power station on the site identified in Volume II of NPS EN6 at "Wylfa", full details of the forecast trip generation and mitigation of the impact on the trunk road network shall be submitted to an approved in writing by the local planning authority.
66. No development of the cricket pitch shall commence until a scheme illustrating the number, siting and specification of passing places along Lon Trefignedd has been submitted to and approved in writing by the local planning authority. The scheme approved under the provisions of this condition shall be implemented prior to the occupation of the cricket pitch.
67. Prior to use of Cae Glas and Kingsland as workers accommodation associated with any proposed works at Wylfa Nuclear power station, full details of the forecast trip generation and mitigation of the impact on the trunk road network shall be submitted to and approved in writing by the highway authority.

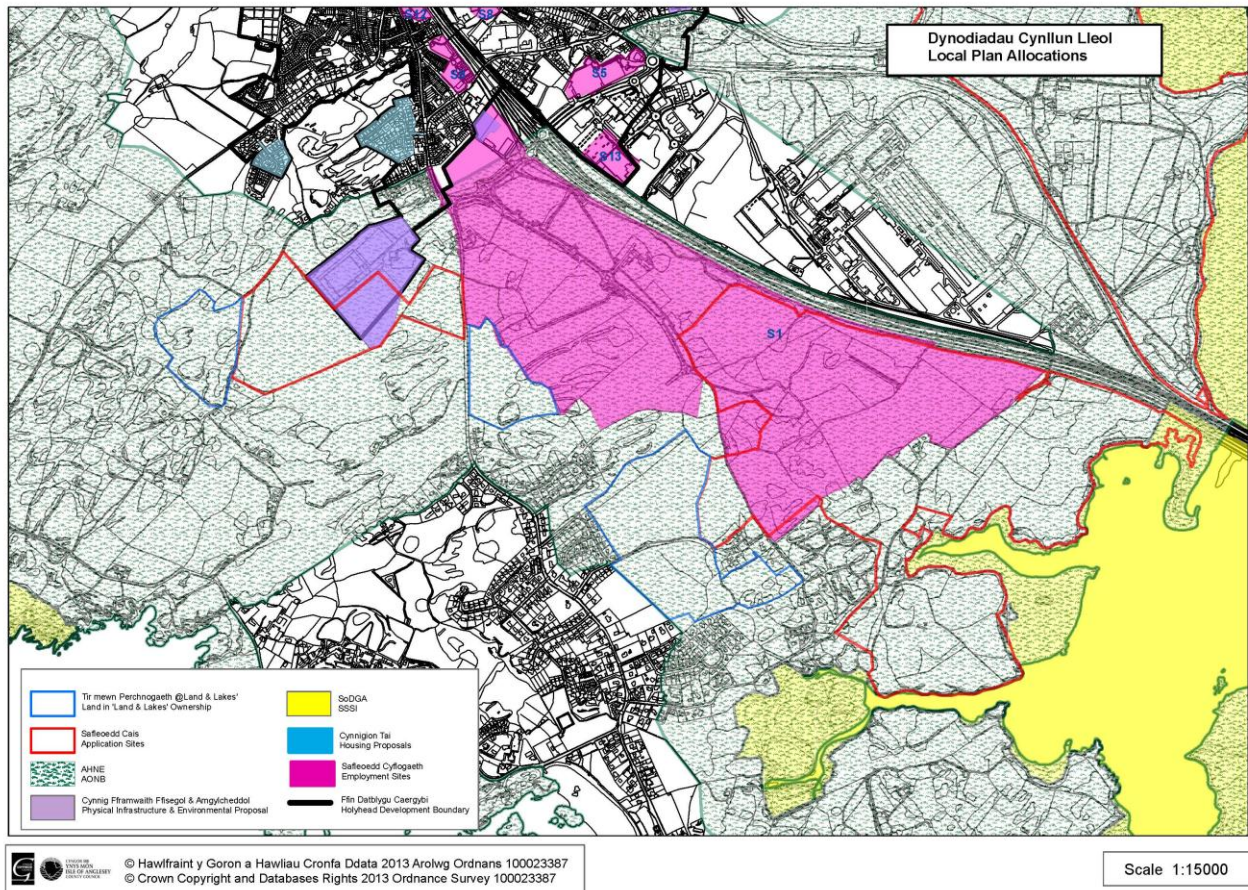
**Outline Planning Conditions – Applicable to Kingsland Hatched in Magenta on the Plan Enclosed as Appendix 6**

68. The Secured by Design standard to be achieved by the residential development at Kingsland shall be submitted to and approved in writing by the Local Planning Authority.
69. Details of play areas and equipment, including arrangements for maintenance in perpetuity, shall be submitted to and approved by the LPA.
70. The car parking accommodation for each dwelling shall be completed in full accordance with the details as submitted and approved before each respective dwelling is occupied and thereafter retained solely for those purposes.
71. The estate road(s) and its access shall be constructed in accordance with 'Technical Requirements for Estate Roads In Anglesey'

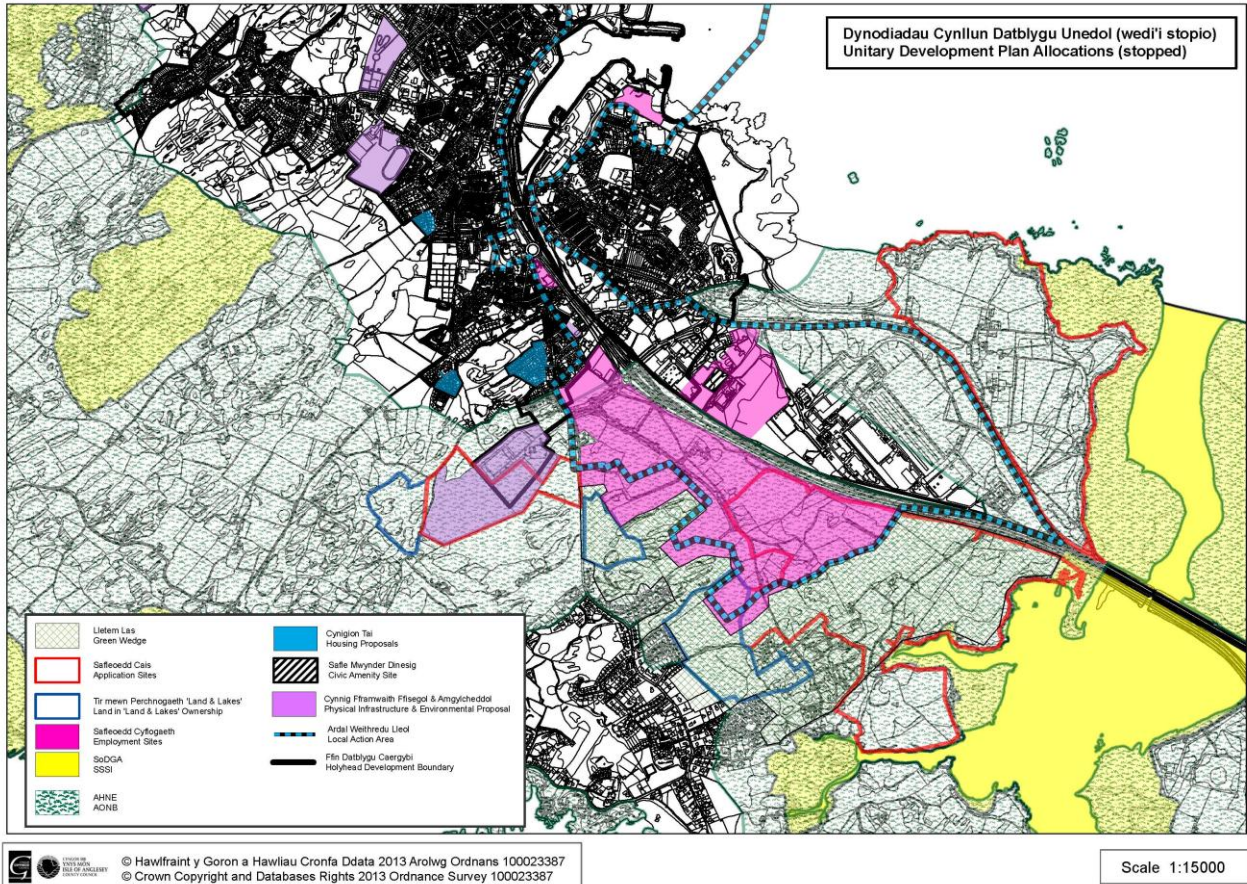
72. The estate road(s) shall be completed to a base course finish with the surface water drainage system complete and operational before occupation of the dwellings which it serves.
73. No development shall commence until measures are in place to secure the future maintenance of the access and estate roads in accordance with details previously submitted to and approved in writing by the local planning authority.
74. The estate road in relation to any phase of the development shall be kerbed and the carriageway and footways surfaced and lit before the last dwelling is occupied or within 5 years of the commencement of development of that phase, whichever is the sooner or within such other period as may be agreed in writing with the local planning authority.
75. Details of surface water disposal from the public highway to be submitted to an approved in writing by the local planning authority.
76. Prior to use of Cae Glas and Kingsland as workers accommodation associated with any proposed works at Wylfa Nuclear power station, full details of the forecast trip generation and mitigation of the impact on the trunk road network shall be submitted to and approved in writing by the highway authority.

## Appendices

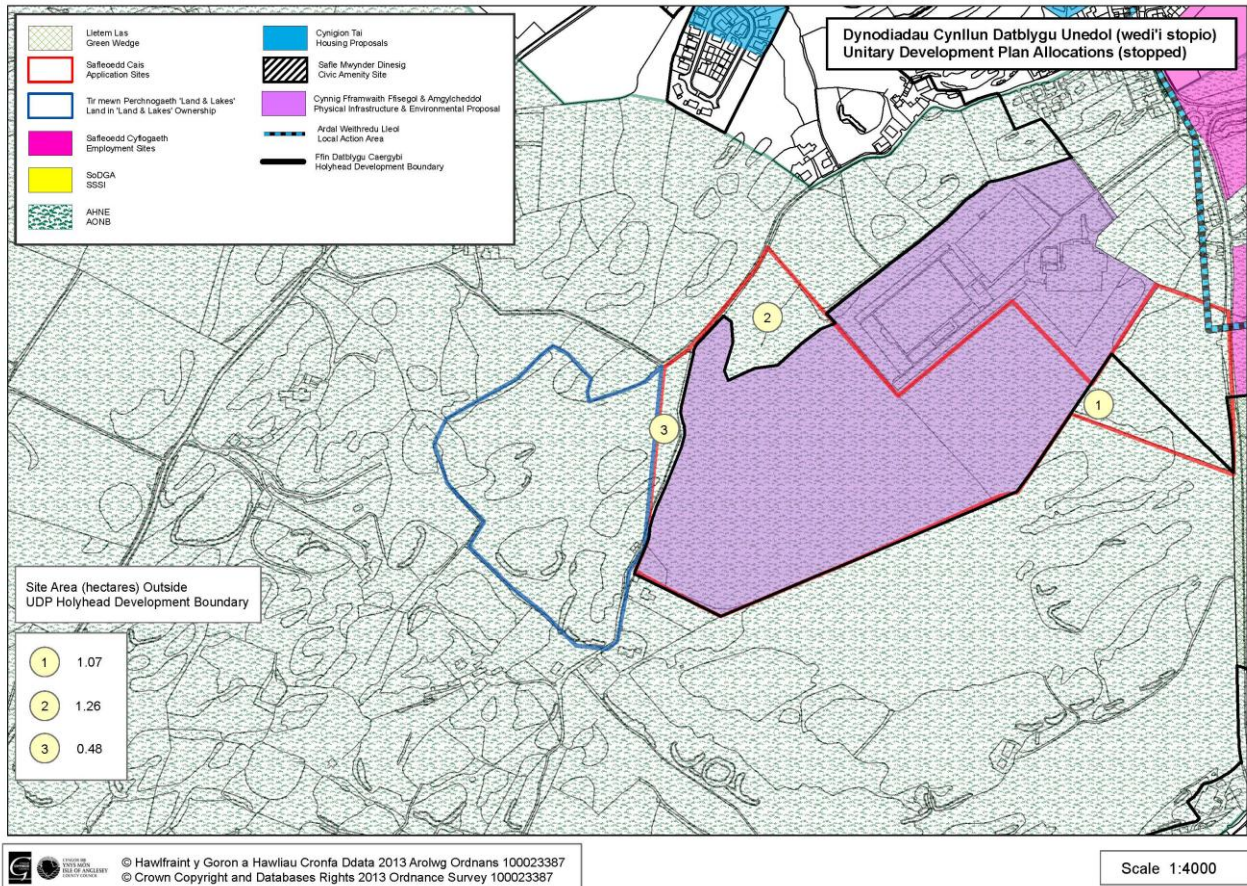
### Appendix 1 – Ynys Mon Local Plan Allocations



## Appendix 2 – Stopped Unitary Development Plan Allocations



## Appendix 3 – Stopped Unitary Development Plan (kingsland)



## Appendix 4 – Representation Received following Initial Publicity in December 2012.

### Objections

A local petition signed by 1200, a WAG petition signed by 837 and e-petition signed by 783 have been received objecting to the planning application. The e-petition is made to stop the development of Penrhos nature reserve (coastal park) and the site should instead be acquired and managed for the community and designated a National Nature Reserve with a long term vision which involves the whole community. The WAG petition urges the Welsh Government to designate Penrhos as a National Nature Reserve for the reasons listed. Individual comments have also been left by individual signatories which have been listed in the objections below. 96 letters of objection received. The ground of objection in the submissions received are as follows (Reference numbers listed are related to paragraphs of Planning Policy Wales):

- All trees in Penrhos are over 200 years old and have Tree Preservation Orders (TPO's, the building of lodges will destroy many of these trees.
- Paragraph 5.2.9 Trees, woodland and hedgerows are of great importance both as wildlife habitats and in terms of their contribution to landscape character and beauty. Local Planning Authorities should seek to protect and areas of woodland where they have natural heritage value or contribute to the character or amenity of a particular locality. Semi-natural woodlands are irreplaceable habitats of high biodiversity value which should be protected development that would result in significant damage.
- When compared to the rest of Wales Anglesey has few forests.
- The Welsh Recreation Outdoor Survey 2008 indicated that the top ten activities are walking, sightseeing, wildlife watching, playing with children, picnicking, informal games, swimming outdoors, running, cycling and mountain biking. The top two places were parks and woodlands. With health and wellbeing. 48.5% of householders in Morawelon have no cars, Penrhos is in walking distance and is free local amenity and should remain so.
- CCW's Accessible Natural Green Space standards recommends that no person should live less than 300m from their nearest natural area of green space and provision should be made for at least 2ha of green space per 1000 population. The loss of 89ha will mean that this area is not available.
- Penrhos is tourist attraction for people all over Britain, attracts 100, 000 tourists a year.
- Visitors TO Penrhos use local facilities' and the loss will impact on these businesses. Traffic on the roundabout on the A5.This could also affect migrating birds.
- There are Tree Preservation Orders on Penrhos which are designed to protect trees. Half of Holy Islands woodland is also on Penrhos.
- There are 200 year old trees on the Penrhos site.
- All three sites are within the coastal AONB.
- There are a wide range of protected plants and species in the woodland of Penrhos including bats, badgers).
- Impact on wild flowers.
- Beddymnach and Cymyran Sites of Special Scientific Interest (SSSI) would be detrimentally affected.
- Loss of public access to an important woodland within the AONB.
- The application conflicts with the Anglesey AONB Management Plan.
- Schools, cyclists, bird watchers and running clubs use Penrhos & well as locals.
- Penrhos was originally made into a nature reserve as a buffer for the Anglesey Aluminium Site.
- Development of the land will curtail public access.
- There is a football and cricket pitch on the Penrhos site.
- No need for further holiday homes/chalets.
- Penrhos Nature Reserve should remain a coastal park/reserve.
- At risk of losing an unique feature in Penrhos.
- Adverse effect on the Morawelon community since the facility is close to a deprived area where many do not have a car.
- Historical impact.
- Impact on future generations.
- Scale and visual impact of the proposed development is unacceptable.
- Public money via various environmental initiatives have been spent in Penrhos over the years.
- There are holiday parks, hotels and B&B's on the Island which are already struggling and scrambling for business.
- Quality & quantity of the jobs offered by the development questioned.
- Do the employment opportunities justify the loss of Penrhos?
- Holiday complexes such as that proposed are self- contained and there are limited spin –off opportunities for the local economy.
- This sort of development does not create employment but instead divert it away from existing business.
- Proposals will bring more people to the dole queue.



- "Horizon" have confirmed in writing that they have had no discussions with Land & Lakes regarding the accommodation of Nuclear workers.
- Workers in connection with "Wylfa B" should be housed in existing accommodation.
- Water sports not possible due to low tide clearing the whole beach and the rocks that are present.
- Impact of water sports on wild fowl and the SSSI.
- A brownfield site closer to Amlwch should be used in connection with the proposed development.
- Crime & disorder issues mean that the development will need to be "caged in".
- Housing development in Kingsland is too big and will overload services.
- The country park 500 lodges will effectively end Holyhead town centre because of its location on the outskirts with all supermarkets and shops also present.
- Ecological survey of Penrhos and Cae Glas required.
- It is being inferred in the press that the planning decision is a done deal.
- Negative impact on the Welsh Language, local history and Welsh culture.
- Traffic through Valley.
- There are alternative uses and ways of managing the Penrhos site and buildings for the benefit of the community.
- Contended that the Penrhos site was given to the people of Holyhead as a nature reserve in 1972.
- Landscape Impact - Area is currently beautiful and unspoilt, the lodge development will spoil this.
- Land and lakes will extinguish a footpath/right of way which would be detrimental to the people who have used it for the last 60/70 years.
- Land & Lakes should instead develop the Anglesey Aluminium site which comprises brownfield land.
- CPRW support the sub-division of leisure units to accommodate up to 2000 workers but not on the Cae Glas site.
- CPRW objects on the basis that all three sites are within the AONB, overdevelopment, distance of car parks from the holiday units and the quality of the prospective development is questioned.
- Proposals do not comply with planning policies.
- Penrhos is valuable in terms of cultural, visual and sensory qualities.
- Development will breach the Wildlife and Countryside Act.
- Effect on local services such as sewage, schools and hospitals.
- The writers property (Felin Heli) is the only privately owned house on Cae Glas and the writer is concerned that they could be affected financially and by means of public disruption. Writers state that the development should not affect their amenities, right of way arrangements are queried.
- Cae Glas should be protected from poachers.
- Urban sprawl between Treaddur Bay and Holyhead.
- Development is in a green belt.
- Development tantamount to a new town.
- Proposals are unimaginative showing no regional individuality.
- Infrastructure both socially and practically does not exist to support such a large influx of people.
- Congestion at the A55.
- The number of new dwellings proposed at Kingsland will mean that it will be difficult for the local community to absorb the influx of newcomers. Can a legal agreement ensure that the dwellings are sold to local people?
- Why can't the Penrhos development be built on previously developed land?
- Cae Glas contains a landfill site with dangerous substances present, can it be developed should it be tested first?
- Are Anglesey Aluminium in breach of their original planning consent, in that they were supposed to re-instate the land & remove contaminants?
- Extent to which the development spreads to the old road to Treaddur Bay around the inland sea area, close to SSSI's and heritage site of the burial chamber.
- What guarantee is there that local people will be used in the construction.
- Scaled down version located elsewhere in Anglesey would be more appropriate.
- Who can afford the houses in Kingsland.
- Visitors will not leave the leisure village at Penrhos, no benefit to the town centre.
- Developers do not state whether the Cae Glas nature reserve will be free of charge.
- What does the community access programme to the leisure village mean?
- Why not use Holyhead itself as a leisure village?
- Long terms safety and general road traffic issues in connection with the use of Cae Glas as a park and ride facility.
- Safety, security and social issues of housing so many construction workers in the proposed camp, effect on the amenities of adjacent residents.
- One writer with a property (The Foundary) adjacent to the Old (A5) expresses concerns as regards the prospects of the volume of traffic and associated noise and dangers as a result of the housing of construction workers and the holiday development.

- Trees cut and replaced by saplings is not mitigation.
- Study commissioned by the council to look at the AONB boundary adjacent to the Anglesey Aluminium site.
- Red squirrels would be disturbed in Cae Glas.
- Disruption, noise and vibration to Penrhos in the course of construction & the effects on wildlife.
- Concern that the Inland Sea will be used for motorsports.
- Impact on the wilderness habitat at Cae Glas.
- Loss of quality farmland/agricultural land.
- The proposals conflict with policy 53 of the Ynys Mon local Plan, A6 of the Gwynedd Structure Plan and the Wildlife and Countryside Act.
- Monstrous development will bring traffic and pollution to the area.
- Not sustainable to put construction workers so far from the Wylfa site.
- The development of Penrhos would lead to a loss of a facility for disabled tourists.
- Social, historical impact on the features of the Stanley Estate.
- Queried whether Centre Parks is a valid comparison for the economic report submitted.
- Extent of the development at Penrhos.
- Leisure facility for the people of Holyhead.
- Not the development that is being objected to but the location in Penrhos.
- A number of writers describe their memories or experiences of Penrhos and object on the basis that the development will stop the activities/experiences in future.
- Path in Penrhos afford disabled, push chairs and others the chance to go for walks.
- Big development and Anglesey don't mix, marina development is unsold, they are banking on Wylfa B, and the Penrhos site will eventually be left empty.
- Feelings of the community should be noted.
- Financial motivation/private gain should not be decisive.
- Ken Williams MBE set up the reserve.
- Motivations and repute of the Isle of Anglesey Council questioned.
- Poor architecture planned in the development.
- Impacts on the historical features on Penrhos such as Tre Gof, the Bullfield, Betting Stand and the Old Pleasure Garden.
- Should be National Trust land.
- One letter is a copy of that sent to the Welsh Government requesting that they "call in" the planning application as a departure from national planning policies in Planning Policy Wales and other points listed , as follows:
- 2.1.1 – A Plan led system The UDP and stopped LDP not adopted so therefore not within the local development Plan. The interim policy is based on a five year housing supply; the land supply for the area 2011 based on the Joint land availability which states we have 5.1% availability remaining for housing. The JLDP due to be adopted in 2016 has enough candidate site areas to exceed the five year housing supply and thus cushioning the significant effects that large sites would make on the community.
- 2.1.7 – LDP's and public certainty Re: The un-adopted UDP and stopped LDP. Misguided locals have already invested in the sites on the areas concerned, in the knowledge that in the worst case scenario, according to the un-adopted UDP, the land, would only be used for leisure purposes (Re: FF6- UDP) for the benefit and enjoyment of the local community.
- 2.4.5 – Strategic environmental assessment The Land and lakes survey does not reasonably take into account the severity of the impact that this development will have in this sensitive environment. It is not supported by the CCW.
- 2.6.3 – Prematurity of L.D.P. Full consideration has not being given for this new site together with the interim policy; this is reflected in the statements which I have already made.
- 3.1.4 – Material considerations for the site. The size of the site will no doubt have an effect on the demographics of the island. The people housed there will also need jobs this may disadvantage the locals. The amount of vehicles will increase dramatically affecting already crowded roads. The flow of traffic to and from the sites will increase causing funnelling and impedance for cyclists and danger to road users.
- The immigration of foreign people without national driving skills.
- The effect on wildlife.
- The loss of enjoyment for local uses of the sites.
- The effect on biodiversity
- The effect of colonisation.
- Places of worship
- The vetting of criminals paedophiles, rapists, drug users etc.
- Effect on local amenities etc.
- Green belt considerations.
- 4.10 – Conserving the best and most versatile agricultural land There is no mention of the conservation

- of any of the agricultural land on this development, farm work and life styles will be affected.
- 4.13.1 Supporting the Welsh language no realistic consideration given towards the demographics or enhancement of the Welsh language.
- 4.13.2 Welsh communities - Although the application states that only 10% of the residential housing will be affordable housing (again a departure from policy) there is no statement to say these will be for the indigenous population.
- 5.5.6 – AONB's special considerations Major developments should not take place in national parks or AONB when there are plenty of other more suitable and sustainable locations on Ynys Mon for large site developments to facilitate Wylfa contractors.
- 7.6.5 – Agricultural development proposals agricultural land lost due to housing development
- 9.3.4 – Significant residential development, the design of the houses is not sympathetic to the surrounding AONB, there are too many concentrated in one area with not enough proposed screening.
- Flooding, the Kingsland site regularly floods.
- Purpose of the AONB is to conserve and enhance the landscape meeting the needs for the quiet enjoyment of the countryside and having regard to those who live there.
- Lodges would have a detrimental impact on the AONB in Penrhos.
- Paragraph 5.2.10 of PPW states planning authorities should make use of their powers to protect and plant trees to maintain and improve the appearance of the countryside and built up areas.

## Support

25 observations received supporting the planning application on the following grounds:

- Provided that the building of Wylfa B nuclear power station is assured, CPRW support that there will be need for accommodation for many construction workers and that Holyhead is the most sensible location.
- Also support residential development of Kings land subject to affordable housing requirements. Also state that all of the 360 units on this site should initially be available for Wylfa workers.
- In relation to the Penrhos site CPRW do not object to some development taking place.
- A number of the letters of support have been received from existing business operators within the leisure, tourism and shipping industry on Anglesey expressing support for the application on various grounds including raising the profile of Anglesey as a tourism destination, employment opportunities, no credible displacement perceived, spin –off opportunities to existing operators, increased volume in the tourist, will attract tourism from Ireland and Cruise Ships which is a priority of the Welsh Government, no existing or destination leisure all year facility on the Island, Destination Management Plan has identified the need for an improved and dynamic leisure offer to support economic growth, insufficient attractions presently available, step-change in the Anglesey tourism offer, will provide a substantial marketing budget to promote the area,
- Boost to the economy.
- Benefit Anglesey and Holyhead.
- Provide a hub to explore North Wales.
- Well considered application taking account of various issues in a sensitive location.
- Must consider the younger generation who have had joy from park and obstruct for the benefit of the community as a whole.
- Young have not had the benefit of good jobs with “Stena” or the railway.
- Will offer means of control for the benefit of the woodland at Penrhos.
- Positive impacts Holyhead and district which has lost jobs over the years.

## Un-Categorised

1 letters received which make observations but which cannot be categorised as supporting or objecting:

- Instead of biomass on the Anglesey Aluminium site why not have a recycling centre for plastic, trees etc. the materials could be used to construct turbines etc.
- The empty Cefni Fruits building in Holyhead could be used as a bowling Alley.

## Appendix 5 – Representation Received following Publicity to the amended application and additional information in June 2013.

77 Objections received on the following grounds:

- The new amendments make little or no difference to the original outline plans.
- I now request that the above plans are Called in by the Welsh Assembly.
- Initial letters of objection still stands on the same grounds as before despite revisions.
- The proposal will destroy what has been home to an array of wildlife (including bats and badgers),

- flora (including rare orchids), fauna and a place most locals spend their leisure time.
- Badger sets present in Penrhos.
  - This recreational location, SSSI and area of outstanding natural beauty has been used by the local public and tourists for over 40 years and for many locals, it is the only woodland area accessible by a majority of people living in deprived areas of Holyhead.
  - It is unaffordable for many to use public transport to travel to other woodland areas on the Island and as a result the health of many will suffer.
  - The limited public access Lands & Lakes propose to allow is limited and will surround an eyesore of a compound.
  - The number of jobs they envisage creating are clearly unrealistic and certainly unsustainable. My personal opinion is that the Wylfa accommodation compound is the main development and the Holiday Village will either come to nothing or will be of a much smaller scale with far less jobs than promised.
  - There are vast amounts of land available for construction of Wylfa construction accommodation, much of it is brownfield (such as the Anglesey Aluminium factory site itself) which could be nicely landscaped and built for post 2020 future tourism needs, granted a lot of the land available is not contained in one area. There is also Rhosgoch, which was identified in 2009 as a potential location for a prison. This is a large brownfield site near Amlwch, which is owned by the Isle of Anglesey. This location, which I imagine will be of interest to CCW, is far closer to Wylfa and far less detrimental to all the attributes previously mentioned and afforded to Penrhos Nature Park.
  - Issues raised as regards the call in of the planning application & requested that the application is called into the planning committee.
  - Keep Anglesey as it is it does not need to be developed to survive.
  - Queried whether the development is worthwhile given the number and type of jobs that the development will provide.
  - Traffic through Valley during the construction and duration of the use of the development. Serious consideration must therefore be given to how traffic flow is to be controlled in order to ensure that life is not made a misery for the residents of Valley. One writer refers to the danger of extra traffic along the A55.
  - Destruction of woodland which is a valuable amenity.
  - Scale of the development.
  - Red squirrels present at Cae Glas.
  - Vehicular access to Kingsland has inadequate visibility.
  - The Kingsland development will impinge on the amenities of the Mill Road area.
  - Local services and amenities that currently cater for residents will require re-evaluation. Medical, police and emergency services will need to be expanded to cater for the increased short and long term demands. An additional migrant workforce of 2000 workers plus the additional requirements of thousands of permanent residents and visitors to the holiday park will place a considerable strain on already extended facilities.
  - Long term job prospects for local residents. Writers suggests that an independent study is conducted of similar leisure developments to determine how many jobs are actually created for locals.
  - Safety and security – the proposed accommodation location is remote from the actual worksite to the extent that mass transport methods have to be adopted to convey workers to and from the worksite. The prospect of 2000 migrant workers residing in Holyhead/Valley will result in social issues.
  - Questioned whether the development will proceed if the lucrative proposal to house Wylfa Construction workers is not approved.
  - Loss of privacy for adjoining residential properties on Lon Trefignaeth in terms of visual amenity, traffic, light and noise pollution given the scale of the development and the facilities to be provided at Cae Glas, particular concern is expressed in relation to the cricket pitch, especially if membership is to increase and more facilities are to be provided.
  - Effect on parking, traffic and road safety – the main entrance to the Cae Glas development is 150-175 meters from the writer's home with car parking for 700 vehicles and a park and ride facility, there will be an impact on traffic and road safety. Workers/visitors will use the road to access Treaddur Bay and the road is 2 meters from the writer's home and is un-lit derestricted single carriageway.
  - Services of adjacent residential properties and the potential for polluting existing water supplies.
  - The proposal does not accord with the existing Ynys Mon or Gwynedd Structure Plan.
  - The proposal is in an AONB proposal contravenes national planning policies.
  - The proposal is adjacent to a SSSI.
  - Brownfield sites are available for Wylfa construction workers accommodation notably Rhosgoch.
  - Impact on the landscape and the AONB.
  - There are trees on Penrhos which are over 200 years old.
  - Penrhos is an important open space necessary for the health and wellbeing of the residents of Holy Island, especially nearby areas such as Morawelon where 48.5% of householders do not have cars.

- Penrhos is a free amenity within walking distance for residents, and should remain that way.
- CCW's Accessible Natural Green space standards recommends that no person should live less than 300m from their nearest natural area of green space and provisions should be made of at least 2 hectares of green space per 1000 population. The population of Holy Island and surrounding areas being approximately 18,000 plus= 36 ha. There should be at least 89 acres of natural green space for locals to use. This will not be available to us if these plans are passed.
- Penrhos is a top attraction for visitors from outside Anglesey who come for the wildlife, to be close to nature, and because it is a safe place to bring children. The top ten outdoor activities can all be undertaken at Penrhos.
- A development of up to 500 holiday lodges will have a big impact on the existing providers of holiday accommodation around Holy Island.
- No other council in the country would consider building on a nature reserve.
- Access to the developments are a bit vague, in particular to Penrhos which is on a fast stretch of road.
- Restriction on the right of access of locals.
- There must be an alternative.
- Local planning authority's public notice is in itself damning.
- Penrhos is one of the few unspoiled places in Holyhead.
- Consideration should be given to those who have placed memorials at Penrhos.
- Penrhos use to be mentioned as a tourist attraction in the Holyhead Town Guide. The proposal would further detract from the island's natural attraction.
- Based on Horizon's timetable for the development of Wylfa B there is no rush to grant planning permission for this development.
- There are incredible monuments and buildings within the Penrhos site.
- Horizon has stated that they have no plans to house their workers in Kingsland and that they wished them housed all over the Island.
- Impact on crime rate and drug addiction rates.
- Penrhos should be made profitable for educational purposes.
- Proposal contravenes national planning policies in relation to the protection of trees, flora and fauna.
- Coastal location is not conducive to a centre parks type development.
- Development would remove a green lung and recreational facility for Holyhead.
- Issues raised in relation to a prospective Welsh Government grant.
- Penrhos is a historic landscape in Holy Island.
- Traffic on the Britannia Bridge
- Cymdeithas yr Iaith object to the development on the grounds that the impact of the development on the Welsh Language will be significant.

One letter received directly by the council's Highway Section expressing concern about the condition of the public highway from Park Cybi to Treaddur Mews (Lon Trefignath). The writer explains that traffic has increased over recent years and that this has resulted in problems due to the narrowness of the road and number of bends. The writer suggests that passing places should be provided.

One letter from Mon Communities First expressing support for the development subject to provisions that the developers engage with the local community and provide work experience and job opportunities.

Stena Line have stated that whilst they have no objections to a water sport centre, they are concerned about how the water sport centre is managed so as to avoid conflict with commercial marine traffic in the harbour.

Observations have been received from Deepdock Ltd who has operated a mussel fishery within Beddmanarch Bay since 1997. This is legislated for through the 1967 Sea Fisheries (Shellfish) Act and we are going through the process required to maintain and continue this use. One of the requirements of the mussel fishery is that because the animals are produced for human consumption the area has to be classified, that it has been assessed for bacteriological quality. Beddmanarach Bay is classified as long term B. The local planning authority are requested to ensure that the development does not affect the quality of the water. I am sure that the developer would be seeking to adhere to all responsibilities and obligations associated with compliance with Urban Wastewater Directive, Water Framework directive and the Shellfish Waters directive, but it is requested that the point is noted. In a second letter they state that the Welsh Fisheries Strategy (2008) sees the further development of marine aquaculture in Wales as being an important objective, the writer states that they are aware of at least one person who has some preliminary plans for shellfish aquaculture activity adjacent to the development.

#### **Appendix 6 – Representation Received following Publicity to the amended application and additional information in August 2013.**

221 letters received at the time of writing objecting to the planning application on the following grounds:

- One letter received from the owners of a property located on the edge of the Cae Glas development at Lon Trefignath. Querying whether all 2,400 Wylfa will be housed at Cae Glas?
- Loss of privacy for adjoining properties. 2000 construction workers and subsequently 1,000 visitors will affect privacy of properties on Lon Trefignath. No indication is provided how privacy of adjoining properties at Lon Trefignath would be protected.
- Effect on parking, traffic and road safety – The main entrance for the Cae Glas development is 150-175 meters from our home, with car parking for 700 vehicles and a park and ride facility, there will be an impact on traffic and road safety. Workers/visitors will use the road to access Treaddur Bay. The road runs approximately 2 meters from the writer's home and is unlit, de-restricted single carriageway.
- Increased noise and general disturbance from the Cae Glas development, the proposed Cricket pitch will also be located in front of the writer's property.
- The siting of the cricket pitch brings further concerns that cricket club membership may increase, licensing applied for and effectively put a private social club adjacent to the writer's property outside the applicant's control.
- Light pollution from the development.
- Effect on the services of adjacent properties notably pollution of groundwater's which could affect the water supply of the writer's property, private sewerage facilities, overland electricity and telephone lines, and requirement to re-route or upgrade would remain with the developer.
- The proposal does not accord with the Ynys Local Plan or Gwynedd Structure Plan.
- The proposal seeks to develop an AONB, with some adjacent areas declared a SSSI; as such it would seriously damage or detract from a conservation area.
- Penrhos is used by dog walkers and nature lovers and the reserve has served the community in this way for centuries.
- One of the few areas in Holyhead which is unspoilt and that people can call their own.
- Tinto site should be redeveloped as it is an eyesore.
- High Street and empty industrial areas should be redeveloped.
- Consideration should be given to those who have placed memorials at the reserve.
- Developments too large for a quiet area.
- Disruption and loss of habitat for birds and wildlife.
- Loss of agricultural land.
- AONB & contrary relevant policies.
- Disruption of traffic on the A5 and main Treaddur Road (Lon St Ffraid).
- Horizon have no desire to house workers so far from Wylfa and information passed to the writer indicates there have been no discussions with the applicants. No credence in case.
- Applicant has no funding and have applied for a loan from the public purse.
- Scheme for the leisure element is unviable and relies on funding from sales/rental of housing.
- Queries whether Wylfa B would actually generate as many jobs as stated, writer estimates that the number will be 2000 at any one time to be shared with B&B'S, caravan sites etc..
- Road to Wylfa is notoriously dangerous, therefore there are likely to be more fatalities with workers using the road.
- Number & quality of the of jobs likely to be created by the theme park.
- Penrhos should not be destroyed for profit.
- Scale of the development should be reduced.
- Application should be called in.
- Proposed development is not the only option for Anglesey Aluminium land.
- AONB, ancient protected trees present, wildlife and historic buildings present at Penrhos.
- AA land should be gifted to Holyhead. For the benefit of residents.
- Community benefit of a link to Holyhead questioned when you take the community facility at Penrhos away.
- Increasing the number of residential properties will increase number of job seekers in Holyhead & the burden of unemployment as well as increasing demand for local services.
- Where is the market for the proposed number of dwellings. Writer states that families will be moved to the area from large cities.
- A number of letters received stating that the latest amendments make very little or no difference to the original outline plans which were submitted.
- Disappointment expressed that members and officers are supporting the applicants and the destruction of the AONB for a few low paid jobs.
- Writer states that occupants of the holiday development will be unlikely to spend money in the town

- due to the lack of shops and services there, money will be spent at the complex and down the A55.
- Land and Lakes proposals are not in the interests of the area and do not stand up to scrutiny.
  - Jobs will be low paid.
  - Cae Glas nature reserve contains a tip.
  - Cae Glas was declared a nature reserve from where all public access was banned.
  - Red squirrels at Cae Glas.
  - Cae Glas is not a replacement for Penrhos.
  - Rhosgoch is the sensible location for workers accommodation.
  - Economic advantageous of the scheme are dubious.
  - A letter to a newspaper from Lord Eric Avebury stating that Penrhos Coastal Park should be preserved in its entirety as a valuable natural asset for the people of Holyhead.
  - Do members realise what a resource Penrhos is?, what if the Dingle or Llanddwyn Beach were subject to proposals?
  - Councillors do not speak for the people of Holyhead.
  - Proposal will trash a beach.
  - Listen to the people of Holyhead.
  - Proposal is detrimental upon the community's wellbeing & future generations - PPG12.
  - Loss of trees.
  - High cultural historic features in Stanley Estate.
  - One of the letters explains that a further 199 people have signed the petition previously submitted. They state that the grand petition is now 2973 signatories' against the development.
  - Development comparable to turning the Taj Mahal into an urinal.
  - Holyhead needs industry, not this development.
  - Nuclear safety.
  - Ecology of the inland sea areas which is currently inaccessible & would be affected by increased use.
  - There is no business case for a leisure development.
  - Development out of scale with the community.
  - Number of houses proposed bears no relation to the local need, infrastructure or sustainability.
  - Penrhos site should be excluded. Penrhos site is a RIGS geological site.
  - Penrhos was gift to the local community.
  - Should be considered in conjunction with other large scale developments in the area.
  - Joins Holyhead & Treaddur Bay.
  - Cost benefits of the proposals should be assessed.
  - Land & Lakes has no experience of this type of development; it has two directors and no capital/financial viability of the company.
  - Beauty of area.
  - If the proposal does not work out will the developers want to build permanent homes on the site?
  - Why not build on and enhance a brownfield site, answers to these questions required.
  - Scale of development, what about doctor's surgeries and hospitals.
  - Realise it is private land but could something not be done to secure it for the people of Holyhead.
  - There were proposals to designate the area a nature reserve; development of this offer could undermine a valuable resource.
  - A Planning Advice Wales adviser has commented that 'If a private project depends on public subsidy, the EIA should make this clear.' I hope that the Planning Committee members fully appreciate the extent to which the developer proposes to rely on public subsidy.
  - The former CCW has serious concerns and an objection. Further the newly formed NRW still has concern over the overall impact on the AONB and they would expect the LPA's decision to follow guidance in PPW on development in the AONB. The AONB is a National designation and is equal to National Parks in status, in terms of landscape and scenic beauty and must be afforded the Highest status of protection
  - This application is in outline, this introduces uncertainty and difficulty in controlling the development in the future, Land and lakes mitigation's do not outweigh the impacts.
  - Letters of objection are enclosed Iolo Williams detailing ornithological flora concerns, the local Assembly Member expressing the need for the company to re-examine the plans and take local people concerns into account.
  - Pictures are submitted of plants which the objector states will be destroyed by the development.
  - Inspector in the A55 Inquiry concluded that any development on the North East of Holyhead would have a detrimental effect on the area.
  - Mitigation does not outweigh impacts.

- Proposal conflicts with the AONB Management plan.
  - If a private project depends on public subsidy, the EIA should make this clear.
  - Stopped UDP seeks to protect public access to the coast and countryside.
  - Penrhos is a valued environmental resource which is a valued resource for people.
  - There are alternative projects planned in Anglesey which will provide the socio-economic benefits described in the report supporting the application.
  - Proposal contravenes environmental policies in the local plan and Stopped UDP for example in relation to the undeveloped coast.
  - Inappropriate to say that biodiversity features can simply be translocated.
  - Loss of public access to woodland.
  - Pressure on services.
  - Number and quality of jobs created questioned.
  - Traffic going through Valley has increased in recent years the development will exacerbate.
  - Need for workers accommodation at Cae Glas queries, alternative means such as floating hotels suggested.
  - A Nature reserve on the former As tip is not a good idea.
  - Developers have applied for a loan to develop the proposals.
  - Development may have short term benefits but will result in long term damage to a beautiful coastline.
  - Writer is a founder member of Friends of Penrhos and has attempted dialogue with the developers and suggested alternatives.
  - Wider benefits of the holiday & nuclear development queries since the developments are self-contained.
  - Writer states that Horizon has stated that this proposal for nuclear accommodation is one of many which will be considered for workers accommodation. Not clear that this is the best option.
  - Destruction of deciduous woodland.
  - Petition signed by 120 people submitted requesting that Penrhos is bequeathed to the local community and that a working party is established to source grants and funding to run the estate which would remain open to all.
  - Friends of the Earth have expressed concern regarding the conclusion of the ES as regards flooding.
  - No overriding public need for the housing in Kingsland in terms of the AONB policy test.
- One letter received from an owner/occupier of Treaddur Mews adjacent to the proposed cricket pitch. Making a number of points:
    1. The boundary across the back of 14, 15 and 16 Treaddur Mews is drawn incorrectly, too close to the properties and the garage positioned alongside 14 Treaddur Mews. Contended the land is owned by properties at Treaddur Mews as it was purchased in 1994 and the plan should be re-drawn correctly.
    2. Land that the writer outlines in grey in the agricultural field next to Treaddur Mews was fenced off in 1995 following engineering works to a ditch to prevent surface water run-off. Writers indicate that they have fenced the area and used it since 1995. Writer states that this area should be withdrawn from the application site. Writer states that it is essential that the ditch is maintained to prevent flooding of properties at Treaddur Mews and the writer states that it is preferable for the residents to take the area over. The writer then goes to describe the history of flooding at Treaddur Mews and contact with Anglesey Aluminium.
    3. Observations made in terms of the impact on the proposed planting on the amenity of properties at Treaddur Mews and that the area of the proposed drainage ditch cannot be part of the proposed planting scheme.
    4. The privacy of properties at Treaddur Mews should not be diminished by the development of a footpath/cycle track near the buildings, it should be re-routed or removed from the proposals. Also queries are raised as regard the safety/adequacy of this route coming out at Snowden View/Hunters Close. Suggested it should be re-routed along Lon Trefignath.
    5. Cricket wicket is currently aligned in such a way as to lead to accidents and damages to properties at Treaddur Mews.
    6. Writer states that they are in support of other aspects of the proposal on economic grounds.

One letter received expressing support for the development on the following grounds:

- Writer states that they suspect objections are made from those who have retired and are not looking for work or have financial commitments.



- As someone who has a degree and has failed to obtain work the writer states that there is none available.
- Writers states that they are mother of 2 children and hopes that they will stay in the area. If they move this will be a personal loss but also for the Welsh language.
- Writer intends to open a shop in September and the development would help the business and others in the high street.
- Comparison made with the Bluestone development in Pembrokeshire and the advantages this brings to that area.
- Opportunity to turn Holyhead from a poor coastal town to a premier Holiday destination.

## **Statutory Requirements**

Regard has been taken of the following statutory requirements:

- Area of Outstanding Natural Beauty

In making the recommendation regard has been had to the purpose of conserving and enhancing the natural beauty of the AONB, as required under section 85 of the Countryside and Rights of Way Act 2000.

Section 85 of the CROW Act includes duties to have regard to:

- does not cause significant harm to people, general amenity, residential amenity and environment.
- how well the development fits in with the character of its surroundings and respects the site and its setting.

Protection and enhancement of the landscape is paramount in the AONB and must be afforded the highest status of protection from inappropriate developments. AONB's are designated under the provisions of the 1949 National Parks and Access to the Countryside Act in order to secure their permanent protection against development that would damage their special qualities.

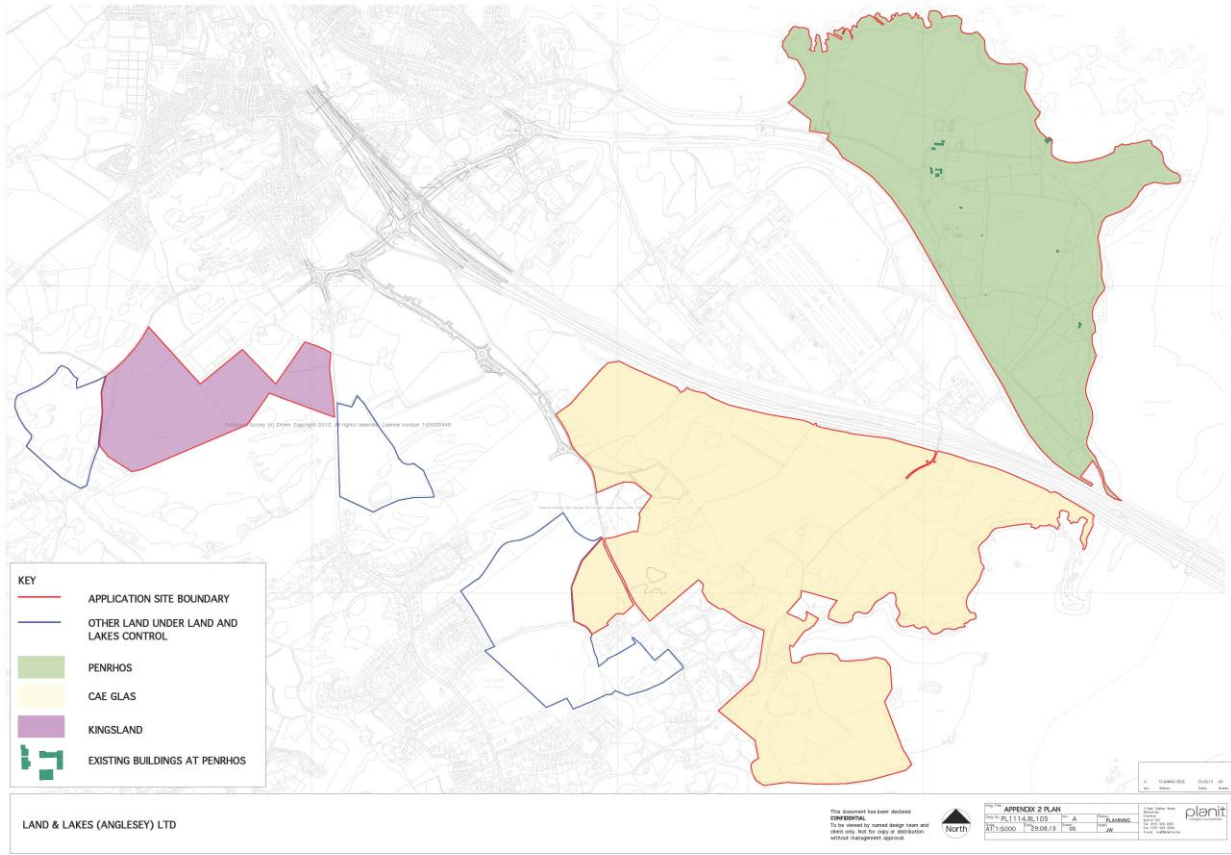
Primary purpose of AONB designation is:

- To conserve and enhance the natural beauty of the landscape.
- Setting Listed Buildings

Special regard to the desirability of preserving listed buildings and their setting or any features of special architectural or historic interest they possess, as required under the provisions of sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

- NERC
- Appropriate Assessment – The Council have considered whether an Appropriate Assessment is required and determined that it is not. On the basis of the information contained within the application and, having regard to NRW's consultation response, the Council has concluded that, provided the identified mitigation measures are implemented (which will be secured by condition and s106) there will be no likely significant effect on the Holy Island Coast SPA.
- Where the proposed development would affect a right of way to which Part 3 of the Wildlife and Countryside Act 1981 applies.
- the Wildlife and Countryside Act, as amended by the Countryside and Rights of Way Act 2000, places a duty on all public bodies (including local planning authorities) to take reasonable steps, consistent with the proper exercise of their functions, to further the conservation and enhancement of the features by reason of which a SSSI is of special interest.
- the Countryside and Rights of Way Act 2000, places a duty on all public bodies (including local planning authorities) to take reasonable steps, consistent with the proper exercise of their functions, to further the conservation and enhancement of the features by reason of which a SSSI is of special interest.
- Legislative provisions relating to protected species ascertain

# Appendix 6 – Plan To Be Read In Conjunction With Planning Conditions



## Appendix 2

### Update of Committee Report

#### Purpose

This appendix provides an update on the planning committee report presented to October Planning Committee and should be read in conjunction with the minutes of the October Planning Committee on this Agenda where a number of updates were also made verbally and are not repeated here.

#### Submissions by the Applicant

The applicant has submitted a detailed assessment of the members reason for refusal on the grounds of over development and the impact on the AONB. (Appendix 3).

Separately the applicant has written detailing overwhelming support for the planning application, provided an operational employment addendum detailing the number and type of jobs to be provided, responded to a number of queries and highlighted significant benefits. (Appendix 4)

In addition the applicant has submitted a slightly amended access plan which curtails turning left and travelling up Lon Trefignath difficult. This has been assessed as acceptable by the council's highway section subject to a condition that it is constructed in accord with the approved plans.

Amended plans have also been submitted on the Kingsland site which removed the development areas outside of the settlement boundary in the Stopped UDP to the north west. In addition the development area outside the settlement boundary (1.07 ha nearest B4545) is replaced by a larger area to the north west of the application site (Area 1A 1.28 ha) which is within the settlement boundary as mitigation. The number of dwellings is consequently reduced from 360 to 320 on the Kingsland part of the development. (Appendix 5).

### 3. Main Policies

Technical Advice Note (TAN) 20: Planning and the Welsh Language (08.10.13) - Since the planning application was considered by the Planning Committee a new TAN 20 has been published by the Welsh Assembly Government which supersedes the previous version. The relevance of this guidance contained in this TAN has now been assessed in determining the planning application in that it deals with Welsh Language matters in relation to the preparation of new development plans. Your officers consider that the TAN has limited weight as the LDP is not expected to be adopted until 2016.

### 4. Response to Consultation and Publicity

A further letter has been received from **Councillor Robert Llewelyn Jones** as follows:

- Has the commissioner for the Welsh Language been consulted and is there a possibility of the new TAN 20 guidelines being in place before the next Planning Committee.
- Figures on the overprovisions approved in the UDP plan period requested.
- Weight to be attributed to comments made in the Inspectors Report on the UDP questioned.
- Dangers of developing next to the "Alpoco" site queried.
- The position in relation to the existing Anglesey Aluminium site is queried.
- Have emission from the proposed Bio –mass plant in relation to the effects on the tourism development been assessed.
- Have the council's Social Serviced and Education Departments been consulted on the planning application.
- Why is the application not been delayed pending preparation of the forthcoming Local Development Plan (LDP).

A detailed response has been supplied to the local member in respect of the above.

**Tourism Partnership North Wales** - Supports the application, above, as it is compliant with the second of four Strategic Objectives in Tourism Strategy North Wales 2010-2015, namely Investing in Product Excellence.

One of the Key Priorities within this Strategic Objective is Providing Quality Accommodation, with which this development proposal is compliant.

This Key Priority aims to ensure there is a sufficient supply and range of quality accommodation to meet changing markets needs, accommodate growth and support a thriving tourism economy.

More specifically the Strategy notes the need for 'A major new self-catering holiday village with leisure facilities'.

In this context, there are a number of holiday parks on the Isle of Anglesey, and across North Wales, but there are no holiday villages. The holiday parks are dominated by privately owned static caravans, and a small number of privately owned chalets. The proposed holiday village business model differs, as chalets will be corporately owned and let to holidaymakers. It is akin to the Center Parcs or Bluestone, Pembrokeshire product model. This development is therefore considered to be introducing a new product model to the Isle of Anglesey and to North Wales, and in effect growing the market, rather than displacing existing business. In the context of self catering accommodation, the Strategy notes the development potential of additional quality accommodation from conversion of redundant farm buildings. This sector is dominated by small developments with limited servicing, in terms of onsite offer of food and leisure provision. Again the comprehensive on site food offer and leisure provision will in effect grow the market, rather than displace existing business. The existing business will remain positioned as independent providers, with an appeal to an independent holidaymaker.

The situation developed at Bluestone, Pembrokeshire was of benefit to the independent self catering accommodation in the area, the holiday village investment generated greater awareness of the area, and increased demand, and offered day visitor leisure and recreational facilities to those holidaying in the independent self catering accommodation.

The all year round operation at the Penrhos site will create a significant number of all year round jobs. The number of jobs, and scale of operation, will create a hierarchy of posts, up to supervisory, management and director levels. This contrasts with smaller developments, where jobs will be mostly operational. The range of services on site will demand specialist skills, in contrast with smaller developments where jobs will be generic.

Without increase in accommodation capacity to replace dated accommodation, additional income will not be generated, nor will the objective to increase the dependence of the Isle of Anglesey on the visitor economy be achieved.

The next decade will be a challenging time for tourism on the Isle of Anglesey. Firstly there will be the delivery of the Anglesey Destination Management Plan. Secondly, accommodation capacity will need to be increased to cope with the demand of energy investment. Failure to do so will entail uptake of accommodation by business usage as opposed to leisure usage, leaving the visitor economy at a much lower base on the completion of energy investment projects. This project will undoubtedly help offset this challenge.

The Land and Lakes project would be of national significance in terms of tourism development and promotion. It will contribute to the national objectives of The Welsh Government Strategy for Tourism 2013-2020 Partnership for Growth, ie to grow tourism in Wales by 10%, increase the number of jobs from 88,300 to 97,130 and increase in tourism contribution to the direct GVA for the Welsh economy from 4.4% to 4.8%.

### **Representation Received following Publicity to the amended application and additional information in August 2013.**

51 submissions received supporting the planning application on the following grounds:

- Holyhead is desperate for jobs with lots of youngsters out of work.
- Anglesey needs something like this desperately.
- Support for the application expressed by Treaddur Bay Junior Football Club on the basis that they are being offered alternative facilities.
- Employment and future Youth employment.
- Support for the application expressed by Holyhead Golf Club.

- "Communities First" have written in expressing concern on the impact on future employment in the area. In addition an analysis is included of the petitions submitted objecting to the planning application. In addition they explain that increased employment opportunities are required to deal with poverty.
- One letter of support received from the Destination Management Partnership, due to the importance of the Land and Lakes Development to the Destination Management Strategy.
- Anglesey and Holyhead needs to improve its tourism profile and this quality holiday accommodation with all year round facilities will provide a great hub for tourist to explore the Island.
- This is a well-considered application taking account of the various public amenity issues and developing in a sensitive location.
- Investment and supply chain opportunities.
- The proposal has assessed the impact of Wylfa B and the Island would benefit from the development.
- One letter received explaining that they wished their name to be removed from the petition of support and that they now supported the application.

2 submissions received objecting on the following grounds:

- Please don't allow this beautiful place to be ruined.
- Committee decision correct.
- Application is a departure and contravenes policies.
- Application contravenes AONB policy.
- Linkages between elements of the proposal queried.
- Cost of any appeal will be borne by the council not councillors.
- Ask that the applicants to gift to the land to the community.

A number of the letters/e-mails above were sent directly to local members prior to and post the Planning Committee resolution objecting and supporting which have been forwarded to the Planning Department. Grounds of support include the poverty, deprivation and unemployment in the area, benefits offered by the development including jobs, Penrhos is not the only Beauty spot available, town and business in Holyhead are declining, why stop progress, development would prevent the out migration of people looking for employment. Objections are made on the grounds that the application is a departure and other policy considerations in relation to a coastal location and the AONB, inter linkages between the 3 sites are queried, jobs unproven, development depends on public funding, significance of the AONB in attracting tourists.



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22 October 2013

Gwyndaf Jones  
Isle of Anglesey County Council  
Council Offices  
Llangefni  
Anglesey LL77 7TW

**By Email & Post**

Dear Mr Jones

**LAND AND LAKES PROPOSALS AT HOLYHEAD  
APPLICATION REF: 46C427K/TR/EIA/ECON**

I am writing further to your Council's consideration of this application at its meeting on 2 October 2013. At that meeting the Committee indicated a provisional decision to refuse planning permission on two grounds, namely "over development" in the countryside and detrimental impact on the AONB (Area of Outstanding Natural Beauty). In accordance with the County Council's constitution (paragraph 4.6.12), because that decision was contrary to the Officer's recommendation to approve the application, the item was deferred to the following meeting so as to allow Officers to report further on the matter. We understand that the application is to be reconsidered at the Planning Committee scheduled for Wednesday 6 November.

Members have the benefit of a very full and highly detailed Officers Report which addressed all relevant aspects of the application. The purpose of this letter is to highlight those aspects of the report, which summarises and assesses the substantial amount of information submitted by the Applicant in support of the scheme, in order to directly address the two grounds of objection the Committee identified.

**Over Development**

The rationale for the Committee's judgement that the scheme comprises "over development" is unclear. Over development is generally characterised by one or more of a number of factors which suggest that the proposals exceed the technical or environmental capacity of the application site. Neither circumstance applies here.

None of the technical consultees who have carefully considered the application proposals raise any objections. It is particularly noteworthy that the highways department of the Council are content that the traffic generation forecast to arise from the scheme can be safely and adequately accommodated on the road network, with certain improvement works being funded by the developer. This conclusion flows from independent assessment work by expert consultants carried out on behalf of the Council.

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Another symptom of "over development" is an inability to provide adequate car parking within a development. In relation to all three elements of the proposed scheme the Council is content that adequate parking and servicing arrangements can be provided to meet the required standards. Scale and massing could be an indication of over development and may be indicated by an unacceptable visual impact which could not be adequately mitigated. The Council's Landscape Officer does not object to the proposals, nor does Natural Resources Wales (NRW) subject to refinement of certain aspects of the mitigation proposals. The Council's Tree Officer reaches the same conclusion. Finally as there are Listed buildings within the application site there is potential for new development to adversely impact upon their value and setting. The Council's Conservation Officer raises no objection: indeed the Officer's Report confirms that the Officer is "*generally supportive of this application which seeks to breathe new life back into the Penrhos estate.*"

A detailed exercise has been undertaken to identify the extent of the new buildings, roads and pathways which would be created once all the developments have been completed. The total surfaced area of the three sites is just 17% of the application site area; put another way 83% of the total site will be enhanced through active, long term management and stewardship, with public access to key areas secured in perpetuity.

In summary, when considered against any of the normal indicators of a site which is "over developed" we would suggest that there is no evidence to support the contention that the application proposals could be described as falling within this category.

#### **Impact on the Area of Outstanding Natural Beauty**

The second limb of the Committee's concern related to impact upon the AONB. This matter is discussed extensively in the Officer's Report which carries out a detailed assessment of the application against Planning Policy Wales (PPW) which prescribes the relevant tests. It concludes:

- A need, in terms of national considerations, exists for all elements of the proposal. This includes a national need to support the planned nuclear new build power station at Wylfa and a tourism/economic need for the long term uses which would follow initial occupation by construction workers;
- An inability to accommodate the proposals elsewhere outside the AONB given the particular locational requirements and the interdependency between the various sites/uses. The need for a coastal location is particularly important in relation to the Penrhos Leisure Village;
- That there would be a severe negative impact on Holyhead and the sub-regional economy by refusing the application, as none of the economic benefits would be realised and tourism industry could be severely impacted without a coherent worker accommodation proposal; and
- As noted above, whilst there will be short term impacts on the landscape, the detailed mitigation proposals which are put forward, and which have been discussed with the Council's Landscape Officer and NRW, will moderate these as the scheme (and its associated planting) matures.

In reaching the overall assessment in terms of impact on the AONB, it is appropriate to attach significant weight to the economic benefits, as the Council is required to do under the latest advice in PPW. National Planning Policy calls on Local Planning Authorities to "*adopt a positive and constructive attitude to applications for economic development, taking into account the likely economic benefits based upon robust evidence.*" "Economic

development" is any development of land that generates wealth, jobs and incomes: the leisure village proposals at Penrhos and Cae Glas clearly fall within this category. PPW makes clear that economic benefits should be fully understood, and given equal consideration alongside social and environmental issues. It goes on to say that there will be occasions where the economic benefits will outweigh social and economic considerations.

The Council's Economic Development Unit has concluded that this proposal is "an opportunity to transform the economic, environmental and social composition of Holyhead and the surrounding areas, which given the current economic climate is extremely positive and very much welcomed." It goes on to say that this is a "unique opportunity" to capitalise on the substantial inward investment of Wylfa, the Celtic array, Lateral Power and a number of other major development proposals, including this scheme by Land and Lakes.

### **Summary**

In our view there is no robust evidence to support a refusal of planning permission based upon the two grounds identified by the Committee in October. Drawing upon the Council Officer's own assessment it is clear that this scheme design cannot rationally be described as "over development" and that when tested against National Planning Policy relevant to development in AONB, the scheme meets all the key criteria.

Whilst there will inevitably be some impacts from the development of this nature, there will be huge economic and regenerative benefits associated with its implementation. PPW advises Local Planning Authorities to attach great weight to these benefits, which have a particular resonance in areas like Holyhead where jobs, training and economic regeneration is urgently needed.

I hope these comments are helpful and that Members will consider them carefully when debating this application at its forthcoming meeting.

Yours sincerely



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Your ref:  
Our ref: JS/874

24 October 2013

Gwyndaf Jones  
Isle of Anglesey County Council  
Council Offices  
Llangefni  
Anglesey LL77 7TW

**By Post and Email**

Dear Mr Jones

**LAND AND LAKES PROPOSALS AT HOLYHEAD  
APPLICATION REF: 46C427K/TR/EIA/ECON**

I am writing further to Gary Halman's letter dated 22 October 2013 which contained a comprehensive response to the two grounds for refusal indicated by Members in their provisional decision to refuse planning permission at the Councils Planning Committee Meeting on 2 October 2013.

This letter summarises the support for the development, the changes proposed to the scheme by Land & Lakes, and the key aspects of the significant community benefits that the scheme will deliver if planning permission is granted. It is requested that the information provided in Gary Halman's letter (22 October 2013) and this letter is covered in the Officers report to Planning Committee scheduled for 6 November 2013.

**Overwhelming Support for the Development**

As you know, representations submitted to planning applications are often written by objectors as supporters do not feel it necessary to contact the Local Planning Authority to share their views. This however is not the case for this planning application and there is overwhelming support for Land & Lakes proposals and the significant community benefits that will be delivered.

The support includes but is not limited to:

- An **e-petition** in support of the proposals has currently been **signed by 788 signatures**. This e-petition can be found at:

<http://www.gopetition.com/petitions/yes-to-land-and-lakes.html>

- The **facebook page** 'Land and Lakes Anglesey' was specifically created by Land & Lakes for this project and currently has **1,000 likes**. The facebook page can be found at:

<https://www.facebook.com/landandlakesAnglesey>

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- **74 letters of support** have been submitted to the Council **by local businesses and the local community**; and
- **A demonstration in Holyhead** in support of the proposals has been organised by Communities First on Friday 25 October and we have been informed that it is estimated that **200 members of the local community** will attend.

The above is a snapshot of the level of support for the proposals to date which we request is reflected in the Officers report to Committee. This level of support is growing daily and we will confirm the actual level of support for the proposals ahead of the Planning Committee meeting.

### **Supplementary Information**

#### **Land & Lakes Question and Answer Document**

Land & Lakes proposals have been widely debated locally and there were a number of questions raised by Members at the Planning Committee meeting on 6 October. Land & Lakes has prepared a Question and Answer document which contains the correct information in response to the most commonly asked questions during the Councils statutory consultation exercises and the Planning Committee on 6 October. A copy of this Question and Answer document is enclosed.

#### **Operational Employment Addendum**

One of the most commonly asked questions relates to the numbers and types of jobs that the development will create. To address this, Regeneris Consulting has prepared an Operational Employment Addendum which confirms:

- 465 full time equivalent (FTE) on site operational jobs could be created once the leisure scheme is fully operational;
- The scheme could support a further 150 FTE jobs off site, once the leisure scheme is fully operational;
- Prior to the operational phase, the construction phase could support, on average, 420 FTE jobs per annum;
- The Leisure Village will support a broad range of jobs and career paths and a breakdown of the 465 FTE jobs on site is provided as follows:
  - 40 jobs will be created in hotel general management roles, with these roles typically demanding higher than average salaries;
  - 50 jobs will be created in indoor/outdoor leisure roles (e.g. gym, spa, watersports). These types of roles fit well with the growing profile of Anglesey and North Wales more generally as a centre of excellence in activity based tourism;
  - 135 jobs will be created in customer service roles, covering areas such as retail, bar work, restaurant, and hotel concierge/customer relations;

- 215 jobs will be created in housekeeping roles which will service the lodges, cottages, hotel and general facilities of the Leisure Village;
  - 25 jobs will also be created across maintenance, security, landscaping, medical, and transportation roles.
- There is a very strong alignment between the types of jobs which would be created at the Leisure Village and with the identified demand from unemployed residents in Anglesey. The proposed development provides an excellent opportunity for local unemployed residents to start a career in the construction and hospitality sector.
  - Land & Lakes is proposing to provide a comprehensive training programme for new recruits to prepare them for the roles they will perform. While this will benefit the recruit, and Land & Lakes, this initiative will also be an important component in strengthening the skills base within the Anglesey labour market. This could have wider benefits for other Anglesey businesses in the future, as staff may ultimately move jobs.

The Operational Employment Addendum re-affirms the significant employment benefits that the proposals will secure which will have an overwhelming positive impact upon the local economy. A copy of the Operational Employment Addendum is enclosed.

#### **A Local Employment Target**

Questions have been raised in relation to who will ultimately benefit from the employment opportunities created. There are significant benefits to Land & Lakes to employ local people and Land & Lakes is targeting 90% of the workforce to be employed from the local area. Not only will this have significant local employment and economic benefits but it will also have a significant benefit on the Welsh language and culture as local people will not have to move away from the area to find employment.

#### **A Revised Access Arrangement to Cae Glas**

Questions have been raised in relation to the possibility that traffic associated with the Cae Glas development could turn left out of the proposed site access which could result in increased traffic flows on the southern section of Lon Trefignath. To ensure that this does not occur Curtins Consulting has revisited the proposed site access arrangement at Cae Glas.

A revised access proposal has been prepared which is shown on the drawing enclosed (dwg ref 90145/004A). The revised access is located in the same position as the previously proposed access; however, the carriageway on the westbound approach to the junction tapers down to a reduced width and there is a tighter radii at the southern tip of the junction. These amendments ensure that vehicles are unable to turn left out of the site access.

A 'Right Only' marking is also proposed on the westbound approach to the junction and the drawing also contains a swept path analysis with a car which demonstrates that the vehicle cannot undertake the manoeuvre without overrunning the kerb.

All other elements of the proposed access remain as previous, which includes the provision of a 3.5m footway/cycleway on the north side of the carriageway. We request that the revised drawing enclosed substitutes drawing ref 90145/TA 101 Rev A.

The changes to the access arrangements for Cae Glas have no effect on the findings of the Transport Assessment or the Environmental Statement. However, for completeness, we have provided a replacement Figure 5.17: Cae Glas Access of ES Volume 2, which reflects the changes to the access point.

### **Significant Benefits**

A wide range of benefits will be secured if planning permission is granted. We request these benefits are summarised in the Officers report to Planning Committee as they represent a significant material consideration in the determination of the planning application and are a direct consideration when assessing the impact the development will have on the Area of Outstanding Natural Beauty in accordance with guidance contained in Planning Policy Wales Edition 5.

As highlighted above, Land & Lakes proposals will provide a wide range of sustainable, local jobs which will replace those lost following the closure of Anglesey Aluminum Metals Ltd, as well as deliver overwhelmingly positive social and economic benefits to the local area and the sub region. The key aspects of the scheme's benefits are summarised below:

- Creation of over **465 FTE permanent on site jobs** and a further **150 FTE permanent off site jobs**. Land & Lakes is targeting **90%** of these jobs to be filled **by Anglesey residents**.
- Creation of an average of **420 full time construction jobs** each year during the main construction years.
- **A Local Employment, Training and Supply Chain Strategy** will be secured through the s106 Legal Agreement.
- The proposals will also make a positive contribution towards the **Welsh Culture and will protect the Welsh Language** in many ways. The creation of wide ranging local job opportunities will **prevent local people moving away** from the area to find work and the **Welsh leisure Village could attract many welsh speaking locals** back to the Island who have had to move away to find work.
- In addition, **local supply chains will be strengthened** and **opportunities for local people and business will be maximised** though additional spending on goods and services.
- The project will act as a **catalyst for new inward investment** to the Island and will have a **transformational impact on the tourism profile** of Anglesey and North Wales.
- **Enhancing and securing the future of Penrhos Coastal Park** which will include:

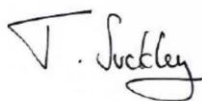
- **29 hectares (73 acres)** of publically accessible land and woodland;
  - A **new visitor centre**, public toilets and enhanced public walkways and boardwalks;
  - A new **Public Right of Way** created on the Penrhos Coastal Path.
- Creation of a **40 hectare (100 acre) new Nature Reserve** with a visitor centre and car park at Cae Glas.
  - The delivery of **50% affordable houses (up to 180 dwellings)** at Kingsland which will be made available to the local community after the site has been used as temporary nuclear workers accommodation.

### **Summary**

In summary, there is overwhelming support for the proposals which is reflected in the social media, e-petition, letters of support from local businesses and the community. Land & Lakes has also provided supplementary information to ensure that the correct information is available. The information enclosed with this letter provides a comprehensive response to some of the most commonly asked questions. In addition the scheme will deliver significant and wide ranging benefits for the local community, the key aspects of which have been summarised above.

We request that the information provided in this letter and Gary Halman's letter dated 22 October 2013 is reflected in the Officers report to Planning Committee and that Members consider it carefully before debating the application at the forthcoming Committee meeting.

Yours sincerely



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Enc. Land & Lakes Q&A Sheet  
Regeneris Consulting Operational Employment Addendum (October 2013)  
Revised Cae Glas Access Arrangement (dwg ref 90145/004A)  
Replacement Figure 5.17: Cae Glas Access of ES Volume 2

Cc: David Pryce-Jones – IOACC  
Richard Sidi – Land & Lakes  
Gary Halman – HOW Planning

# 1. Operational Employment Addendum

1.1 The following is an addendum statement to Regeneris Consulting's socio-economic impact assessments which informed the planning application for the Penrhos Leisure Village scheme<sup>1</sup>. This statement highlights the total estimated full-time equivalent (FTE<sup>2</sup>) operational jobs that would be created by the proposed development, but also provides clarification on the potential spread of jobs that will be created by the Leisure Village.

1.2 The Regeneris Consulting assessment (May 2013) estimated that the proposed development would create 465 FTE operational jobs (rising to 615 FTE jobs once multiplier effects are considered<sup>3</sup>). The on-site employment estimates were based on evidence from Sheffield Hallam University's research on Center Parcs holiday villages<sup>4</sup>. However, the actual number of jobs could be higher than this, given the number of part-time jobs which could be created. The total number of on-site jobs created by the development could be in the region of 650-675 jobs. However, until Land & Lakes have developed their operational plan (e.g. shift patterns, employment contracts), it is not possible to accurately assess this.

1.3 Using insights from Sheffield Hallam University's research on Center Parcs holiday villages, as well as initial insights from Land & Lakes on the future operational requirements for the Leisure Village, Table 1 provides an overview of the potential breadth of jobs available at the proposed Leisure Village. This analysis indicates that:

- 40 jobs will be created in hotel general management roles, with these roles typically demanding higher than average salaries.
- 50 jobs will be created in indoor/outdoor leisure roles (e.g. gym, spa, watersports). These types of roles fit well with the growing profile of Anglesey and North Wales more generally as a centre of excellence in activity based tourism.
- 135 jobs will be created in customer service roles, covering areas such as retail, bar work, restaurant, and hotel concierge/customer relations.
- 215 jobs will be created in housekeeping roles which will service the hotel, lodges and general areas of the Leisure Village.
- 25 jobs will also be created across maintenance, security, landscaping, medical, and transportation roles.

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<sup>1</sup> Regeneris Consulting's *Penrhos Leisure Village - Economic and Tourism Need and Benefits Report*, November 2012; and Regeneris Consulting's Addendum Report *Penrhos Leisure Village Additional Socio-Economic Evidence*, May 2013

<sup>2</sup> Full-time equivalent is a standard measure for quantifying labour market impacts. It refers to the number of jobs a project creates expressed on a full-time basis. In sectors where there are significant levels of part-time employment (e.g. such as the leisure sector), the actual total number of jobs supported by a development scheme is likely to be higher than the FTE job estimate.

<sup>3</sup> Multiplier effects refers to indirect employment supported off-site for suppliers through the Leisure Village's expenditure on bought in goods and services, as well as induced employment supported via the expenditure of direct and indirect workers as they spend their wages.

<sup>4</sup> Sheffield Hallam University, May 2005, *An Evaluation of the local economic impact of Center Parcs Forest Holiday Villages in the UK*

## • Penrhos Leisure Village - Employment Analysis Addendum •

- 1.4 The analysis highlights how the proposed development will deliver a significant supply of new jobs on Anglesey, as well as a wide spread of jobs and careers. Therefore, the scale of the operational employment effects, allied to the construction employment effects<sup>5</sup>, and a commitment from Land & Lakes to prioritise local employment for the proposed development, the Penrhos Leisure Village development presents a major employment and economic opportunity for Anglesey and its residents.
- 1.5 The spread of job opportunities that the proposed development would deliver can also be considered in light of the existing demand for employment opportunities amongst those residents who are seeking work in Anglesey. Over the last 12 months, on average, there have been around 1,960 Anglesey residents claiming Job Seekers Allowance (JSA) benefit<sup>6</sup>. It is possible to analyse JSA claimant data in total, but also by the type of occupation sought by the claimant. Their sought occupation response is then given a code using the Standard Occupational Classification (i.e. a SOC code)<sup>7</sup>.
- 1.6 Comparing total JSA claimant data, by SOC groups, and the total number of job opportunities that would be available at the Penrhos Leisure Village (also classified by SOC groups) indicates that there is a very strong alignment with identified demand from unemployed residents in Anglesey (see Table 2). This analysis therefore highlights that the proposed Penrhos development provides an excellent opportunity for local unemployed residents to get a job and not consider moving away from the area, which also has benefits for the Welsh language and culture.
- 1.7 With the training opportunities proposed by Land & Lakes, it is also important to note that claimants who are currently stating that they are seeking SOC 7-9 type roles<sup>8</sup>, could also be well suited to the roles which fall under the SOC 4-6 group (where there are 312 jobs at the Leisure Village). While some claimants may not yet have the required skill-sets for some of these roles, Land & Lakes approach to 'on the job' training would lead to a wider number of claimants being considered for a variety of roles at the Leisure Village.

### Summary

- 1.8 As our earlier assessments (November 2012 and May 2013) have established, the proposed Penrhos Leisure Village development would deliver significant employment and economic benefits for Anglesey. However, the key points to take from this addendum statement are as follows:
- The Penrhos Leisure Village scheme would create 465 FTE jobs on site and support a further 150 FTE jobs off site, once fully operational. Prior to the operational phase, the construction phase could support, on average, 420 FTE jobs per annum, based on a mixture of on-site work and off-site prefabrication and supply chain work.

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<sup>5</sup> Average of 420 FTEs per annum over construction period based on a mixture of on-site work and off-site prefabrication and supply chain work. Off-site activities will be spread throughout the UK (Regeneris Consulting estimates, May 2013).

<sup>6</sup> ONS Nomis, JSA Claimants by Sought Occupation (October 2012-September 2013). Average taken to account for any seasonal fluctuations over the 12 months. The latest data for September 2013 indicates a claimant count of 1,800 residents.

<sup>7</sup> Standard Occupational Classification (SOC) codes are used by the Office for National Statistics (ONS) to classify different occupations for labour market and statistical purposes.

<sup>8</sup> There are approximately 1,250 claimants seeking this type of work in Anglesey, while the Penrhos development would deliver 111 jobs of this nature.

● Penrhos Leisure Village - Employment Analysis Addendum ●

- The Leisure Village will support a broad range of jobs and career paths, including general management, customer service, leisure services, food & beverage, housekeeping, and maintenance roles.
- There is a very strong alignment between the types of jobs which would be created at the Leisure Village and with the identified demand from unemployed residents in Anglesey. The proposed development provides an excellent opportunity for local unemployed residents to start a career in the construction and hospitality sector.
- Land & Lakes are proposing to provide a comprehensive training programme for new recruits to prepare them for the roles they will perform. While this will benefit the recruit, and Land & Lakes, this initiative will also be an important component in strengthening the skills base within the Anglesey labour market. This could have wider benefits for other Anglesey businesses in the future, as staff may ultimately move jobs.

1.9 This addendum statement has highlighted the type of jobs which would be created at the Leisure Village, as well as the strong fit between these roles and local demand for employment opportunities amongst Anglesey's unemployed. If the proposed development is given planning approval, the Leisure Village has the potential to deliver significant economic and employment impacts, particularly for local people in Anglesey.



• Penrhos Leisure Village - Employment Analysis Addendum •

Table 1: Potential Breadth of Jobs at Penrhos Leisure Village			
Standard Occupational Classification (SOC) Code	Type of Job	No. of FTE Jobs	%
SOC1/2	General Management	40	9%
SOC6	Lodge / Hotel housekeeping	180	39%
SOC6	Facility building / General housekeeping	35	8%
SOC9	Restaurant staff	45	10%
SOC7	Shop / Retail staff	25	5%
SOC6	Health Spa / Gym staff	25	5%
SOC6	Watersports / Spa / Outdoor recreation	25	5%
SOC9	Bar staff	30	6%
SOC4	Reception / hospitality / concierge	35	8%
SOC9	Security	6	1%
SOC5	Landscape / Nature Reserve Maintenance	8	2%
SOC2	Medical services	2	0%
SOC8	Coach Drivers	3	1%
SOC9	Mail Room & Porterage	2	0%
SOC5	M&E maintenance	4	1%
	Total On-site Operational FTE Jobs	<b>465</b>	<b>100%</b>
	Off-site supply chain FTE Jobs	150	
	Total FTE Jobs	<b>615</b>	

Note: Actual number of jobs will be higher than the FTE job number as many will be taken on a part-time basis.  
Source: Regeneris Consulting, based on insights drawn from Sheffield Hallam University's research on the economic impact of Center Parcs (*An Evaluation of the local economic impact of Center Parcs Forest Holiday Villages in the UK, May 2005*); and insights from Land & Lakes (Anglesey) Ltd on the future operational employment needs of the Leisure Village.

Table 2: Demonstration of the Fit of Employment Opportunity at Penrhos Leisure Village and Employment Need in Anglesey amongst JSA Claimants		
	Penrhos Total FTE Jobs	Total JSA Claimants by Occupation Sought
SOC 1-3: (1) Managers and Senior Officials; (2) Professional occupations; and (3) Associate Professional and technical occupations.	42	179
SOC 4-6: (4) Administrative and secretarial occupations, (5) Skilled trades occupations, and (6) Personal service occupations.	312	536
SOC 7-9: (7) Sales and customer service occupations, (8) Process, plant and machine operatives, and (9) Elementary occupations.	111	1,246
Total	465	1,961

Note: Skill levels associated with occupational SOC codes are typically higher the lower the SOC number.  
Source: Regeneris Consulting; ONS Nomis, JSA Claimants by Sought Occupation (October 2012-September 2013). Average taken to account for any seasonal fluctuations over the 12 months.



## LAND & LAKES QUESTION AND ANSWER DOCUMENT

### FOR PENRHOS COASTAL PARK, ANGLESEY

OCTOBER 2013

This document has been provided to ensure that the correct information is available to respond to some of the most commonly asked questions.

**1 What is the interdependency between the 3 sites and why could the Application not have been split into separate Applications for the separate land parcels?**

Although all three sites are physically separate, they are all interrelated. The following summarises the interdependency of each site on each other to provide the overall tourism destination and resulting economic and environmental benefits:

- **Penrhos** – the leisure village at Penrhos requires a coastal location to create a leisure destination which can compete with other inland leisure destinations in the UK. Penrhos has the benefit of coastal and beach access which is the schemes USP and will enable a step change in Anglesey’s tourism offer to be created.
- **Cae Glas** - is linked to Penrhos as the proposed holiday lodges at Cae Glas would require the use of the main leisure facilities at Penrhos, following the initial period of worker accommodation. Cae Glas would also provide the replacement public open space, replacement sports facilities and ecological provision.
- **Kingsland** – the housing would initially be used to accommodate nuclear workers and is dependent on the use of Cae Glas central canteen, leisure facilities and transport hub which would be provided as part of the initial phase of workers accommodation and facilities at Cae Glas

The three elements all work together to ensure the development of the overall vision, legacy and economic, environmental and social benefits for the area. For these reasons the Application cannot be split into component parts.

On the basis that Wylfa B goes ahead as part of the Energy Island proposals then locating temporary nuclear workers at Cae Glas and Kingsland fits within the strategic approach required by the Council and provides investment in tourism / leisure infrastructure at Cae

Glas (and Penrhos) to deliver the overall leisure destination, coupled with a substantial affordable housing provision.

**2 Can Kingsland housing be developed without being initially used for Wylfa workforce?**

Kingsland housing is only to be developed if it is first required for temporary use by Wylfa B nuclear workforce. This restriction is legally binding and laid out in the s106 Heads of Terms (ref No 24) that states *“Restrictions on leisure development at Cae Glas and housing at Kingsland to only proceed if the sites are first used for providing construction worker accommodation in connection with Wylfa B.”*

**3 What kind of jobs will be available and will there be any training provision?**

The building of the scheme would create 420 full time equivalent (FTE) jobs per year in the construction sector over the main build period. We are committed to working with local training providers and Coleg Menai to ensure training is provided for local employment.

The operation of the Leisure Village/ nuclear worker accommodation campus would provide a whole new hierarchy of jobs in the hospitality sector. We target 90% of all our operational employees to come from the local area (Anglesey) and we have already established links with Agoriad, Mon CF and local schools to ensure there will be opportunities and training for local people.

The Regeneris Consulting assessment (May 2013) estimated that the proposed development would create 465 FTE operational jobs (rising to 615 FTE jobs once multiplier effects are considered).

The actual number of jobs would be higher than this, given the number of part-time jobs which could be created. The total number of on-site jobs created by the development could be in the region of 650-675 jobs. However, until we have developed our operational plan (e.g. shift patterns, employment contracts), it is not possible to accurately assess this. A breakdown of the estimated jobs is provided below:

Table 1: Potential Breadth of Jobs at Penrhos Leisure Village			
Standard Occupational Classification (SOC) Code	Type of Job	No. of FTE Jobs	%
SOC1/2	General Management	40	9%
SOC6	Lodge / Hotel housekeeping	180	39%
SOC6	Facility building / General housekeeping	35	8%
SOC9	Restaurant staff	45	10%
SOC7	Shop / Retail staff	25	5%
SOC6	Health Spa / Gym staff	25	5%
SOC6	Watersports / Spa / Outdoor recreation	25	5%
SOC9	Bar staff	30	6%
SOC4	Reception / hospitality / concierge	35	8%
SOC9	Security	6	1%
SOC5	Landscape / Nature Reserve Maintenance	8	2%
SOC2	Medical services	2	0%
SOC8	Coach Drivers	3	1%
SOC9	Mail Room & Porterage	2	0%
SOC5	M&E maintenance	4	1%
	<b>Total On-site Operational FTE Jobs</b>	<b>465</b>	<b>100%</b>
	<i>Off-site supply chain FTE Jobs</i>	<i>150</i>	
	<i>Total FTE Jobs</i>	<b>615</b>	

Note: Actual number of jobs will be higher than the FTE job number as many will be taken on a part-time basis. Source: Regeneris Consulting, based on insights drawn from Sheffield Hallam University's research on the economic impact of Center Parcs (*An Evaluation of the local economic impact of Center Parcs Forest Holiday Villages in the UK, May 2005*); and insights from Land & Lakes (Anglesey) Ltd on the future operational employment needs of the Leisure Village.

The spread of job opportunities that the proposed development would deliver should also be considered in light of the existing demand for employment opportunities amongst those residents who are seeking work in Anglesey. Over the last 12 months, on average, there have been around 1,960 Anglesey residents claiming Job Seekers Allowance (JSA). It is possible to analyse JSA claimant data in total, but also by the type of occupation sought by the claimant. Their sought occupation response is then given a code using the Standard Occupational Classification (i.e. a SOC code). It can be seen that there is a very good fit between jobs to be created and jobs sought by local residents, as the table below illustrates:

	Penrhos Total FTE Jobs	Total JSA Claimants by Occupation Sought
SOC 1-3: (1) Managers and Senior Officials; (2) Professional occupations; and (3) Associate Professional and technical occupations.	42	179
SOC 4-6: (4) Administrative and secretarial occupations, (5) Skilled trades occupations, and (6) Personal service occupations.	312	536
SOC 7-9: (7) Sales and customer service occupations, (8) Process, plant and machine operatives, and (9) Elementary occupations.	111	1,246
Total	465	1,961

Note: Skill levels associated with occupational SOC codes are typically higher the lower the SOC number.  
Source: Regeneris Consulting; ONS Nomis, JSA Claimants by Sought Occupation (October 2012-September 2013). Average taken to account for any seasonal fluctuations over the 12 months.

**4 Will the development stop public access to Penrhos Coastal Park and Coastal footpath?**

The Coastal footpath will remain open and be guaranteed to be available for public use in perpetuity. This will be secured in the s106 Legal Agreement and is covered in the s106 Heads of Terms (ref 11).

Public access to Penrhos Coastal Park is an essential component of the scheme. Public access will be made available free of charge and the following area of publically accessible open space is proposed: 7 kms of walks, 73 acres of the most widely used public amenity (including 37 acres of woodland), a new visitor centre at Beddmanarch House, car park and toilets.

It should be noted that all of this public amenity is currently under threat with the withdrawal of Anglesey Aluminium Metals Ltd (AAM) from the area and no sustainable business to support the extensive maintenance and liabilities.

Further public access is also to be provided by way of the new 100 acre Nature Reserve at Cae Glas.

**5 What is the current cost to maintain the Penrhos Coastal Park and what are the liabilities inherent in the land?**

The cost of maintaining the Park is £250,000 per annum and Land and Lakes has been contributing £100,000 per annum to this cost for the last two and a half years to help AAM keep the land accessible and safe for the public to use.

- At Penrhos, there are 13 leasehold properties (of which 5 are protected tenancies) and leases to the cricket club and football club. There are 200 acres of land under management, including 80 acres of woodland, together with gabion sea defences and Grade 2 listed heritage buildings.
- At Cae Glas, there are 320 acres of land under management, including 100 acres of woodland, 2 leasehold properties (of which 1 is protected tenancy) and an ex land fill

site which represents a liability for monitoring for contamination, maintenance and future remedial work.

- At Kingsland there is 80 acres of land under management

All liability for maintenance of the above land and property rests with the landowner.

## **6 What is the current situation with regard to ex land fill site at Cae Glas?**

Land and Lakes has assessed the Wallace Evans Ltd Report; 1994 and Golder Associates (UK) Ltd Audit Report and Phase II Risk Assessment, 2007.

It is fully understood that the two leachate breakout areas will have to be dealt with by the landowner as part of an options appraisal. Treatment beds may be required to accelerate natural attenuation and we accept that these areas would need to be segregated to prevent public access for a period of time. Land and Lakes have assessed and accepted this level of risk and propose that these particular areas of land will become publicly accessible at the point in time when they are fully remediated, particularly as it contributes to the substantial mitigation benefit for the SSSI.

## **7 What linkages and accessibility will there be to the town centre?**

Land and Lakes is committed to work collaboratively with business and community interests in Holyhead town centre to ensure strong and sustainable linkages and mutual benefit. Transport linkages will be strengthened, including shuttle buses to link guests and employees with the town centre as secured as part of green travel plan (Heads of Terms ref 16 of the s106 Agreement). The establishment of a Community liaison group and close links with Communities First in Holyhead is proposed to provide clear on going communication between the leisure Village and Holyhead.

## **8 Why is the Application so big?**

The site is 600 acres and can accommodate a carefully designed scheme that integrates with the landscape. The overall scheme is proposed on an 88 acre footprint which is 17% of the application site and less than 15% of the overall land area to be purchased by Land & Lakes. Scale brings sustainability, and the requirement to create substantial indoor facilities to ensure a high quality, year round tourism destination. The scheme is designed to channel the economic benefits of housing the Wylfa workforce into a viable scheme with legacy for the future whilst minimising the social and environmental impact on the area.

## **9 Would the development dilute the Welsh language in the area?**

The Penrhos Leisure Village will be promoted and developed as the opportunity to experience the very essence of Wales. It will be a flagship scheme to market Anglesey and Wales. Land and Lakes policy is to target 90% of the employees from the local area and promote as far as is possible employment to Welsh speakers with training available to develop any skills gaps. This job creation will not only keep Welsh speakers on the Island but potentially draw Welsh speakers back. The houses at Kingsland would initially accommodate

nuclear workers but thereafter 50% of those houses will be offered as 'affordable' and targeted towards local people. These affordable houses would offer a real opportunity for local social mobility - for the area's young people to find a complete package of training, employment and affordable housing.

**10 Are you intending to hold the assets for the long term or sell off elements of the site?**

We intend to hold the assets for the long term and be a partner with Anglesey Council and the Community. All of our group's current projects are long term. Land & Lakes are part of the Kingmoor Park Properties / Scowcroft Group – an organisation which values communities and has a history of holding assets for the long term and investing in community infrastructure.

**11 How will Holyhead benefit economically from the Wylfa workforce if their daily needs are met on site?**

The proximity of this professionally managed worker accommodation facility to the main conurbation of Holyhead and local commercial infrastructure will ensure Holyhead benefits from workers disposable income whilst managing the social impact (as mitigated in the Heads of Terms s106 ref 6, 7, and 8). The provision of goods and services on site will prioritise sourcing from local supply chains.

**12 Why have you applied for grant funding?**

Land and Lakes has not applied for a grant but a loan from the Regional Investment fund for Wales (RifW) that forms a part of the overall funding package for this development. Obviously, if the scale and nature of the project means that we can access grants that can be drawn down for the benefit of Anglesey then we will be bidding for them, to augment the substantial private investment that we have already committed to make to this £200 million development and add even more value to our proposals.

**13 Why can't the housing go elsewhere where there is less environmental impact?**

The housing is located at Kingsland, predominantly located within Holyhead settlement boundary on grade 4 agricultural grazing land which is not best and most versatile. It is only developable if the Wylfa workers are initially accommodated at the site and it is required to be located close to the Cae Glas site to enable the nuclear workers to access the central facilities and main transport hub.

**14 What will happen to Penrhos if you are turned down?**

The land is currently owned by AAM, who are withdrawing from the area and wish to sell on. AAM chose Land & Lakes as their partner in their disposal process as Land & Lakes provide the best solution to deliver their objective of creating a legacy to leave behind quality jobs and managed public access.

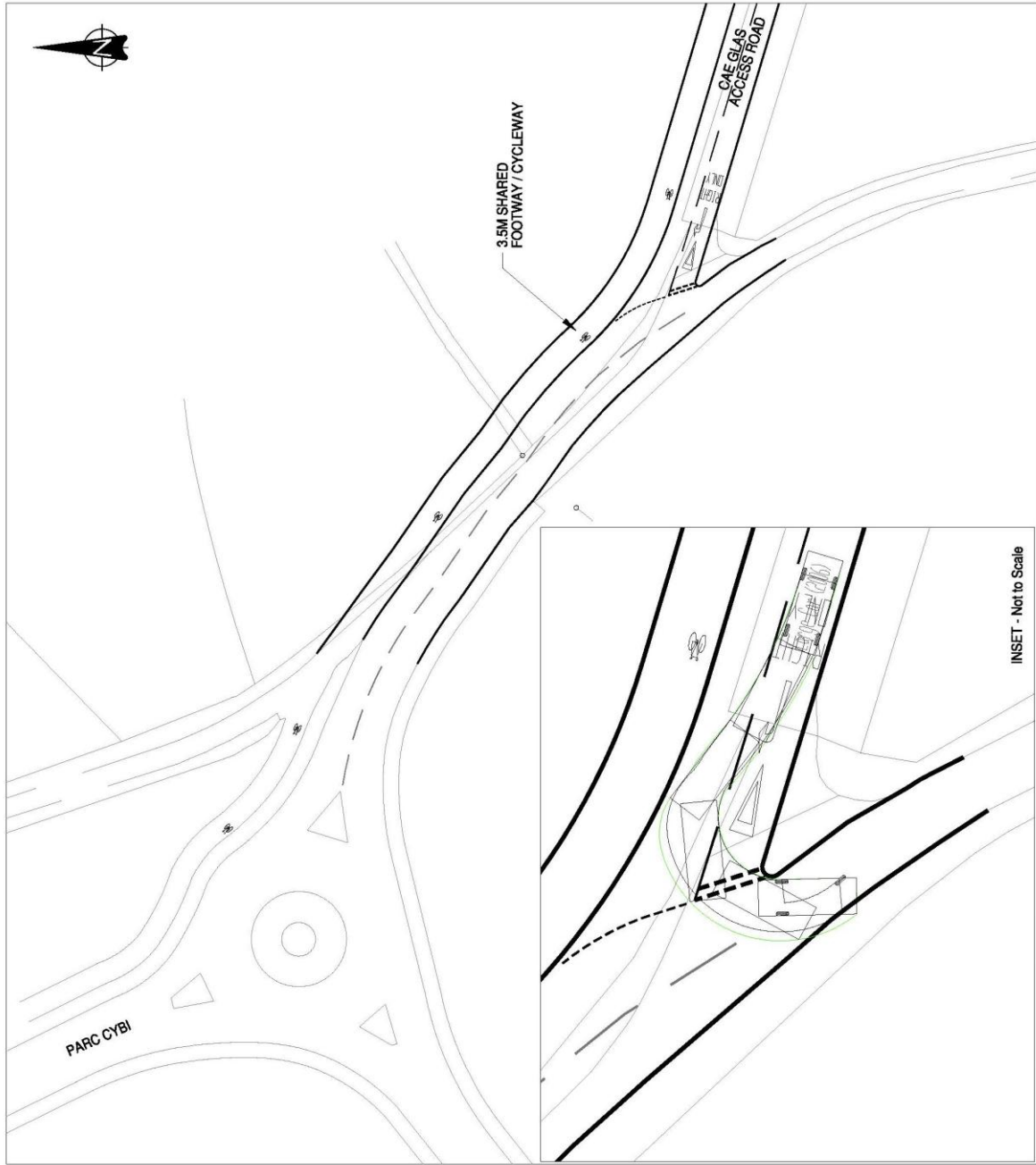
If we are refused and unsuccessful at Appeal, then we would withdraw from contributing to the current maintenance and AAM will look to sell the land as a package and the future of public access to Penrhos becomes wholly uncertain. Public access to the coastal path and Penrhos coastal park is currently only permissive and could be withdrawn.

**15 What will be the impact on schools, police, health and leisure provision as a result of the development?**

We have agreed to mitigate the impact on schools, police, health and leisure for the development both during the worker accommodation period and subsequent open market housing provision (as detailed in the Heads of Terms s106 ref 1, 3, 4, 6, 7, 8 and 12). We have engaged with North Wales Police and will agree to provide appropriate financial contributions to ensure management during the worker accommodation programme.



NOTES:



Rev:	Description:	Date:	By:	Chkd:
A	Junction amended to prevent left turn movement.	17.10.13	MF	KY

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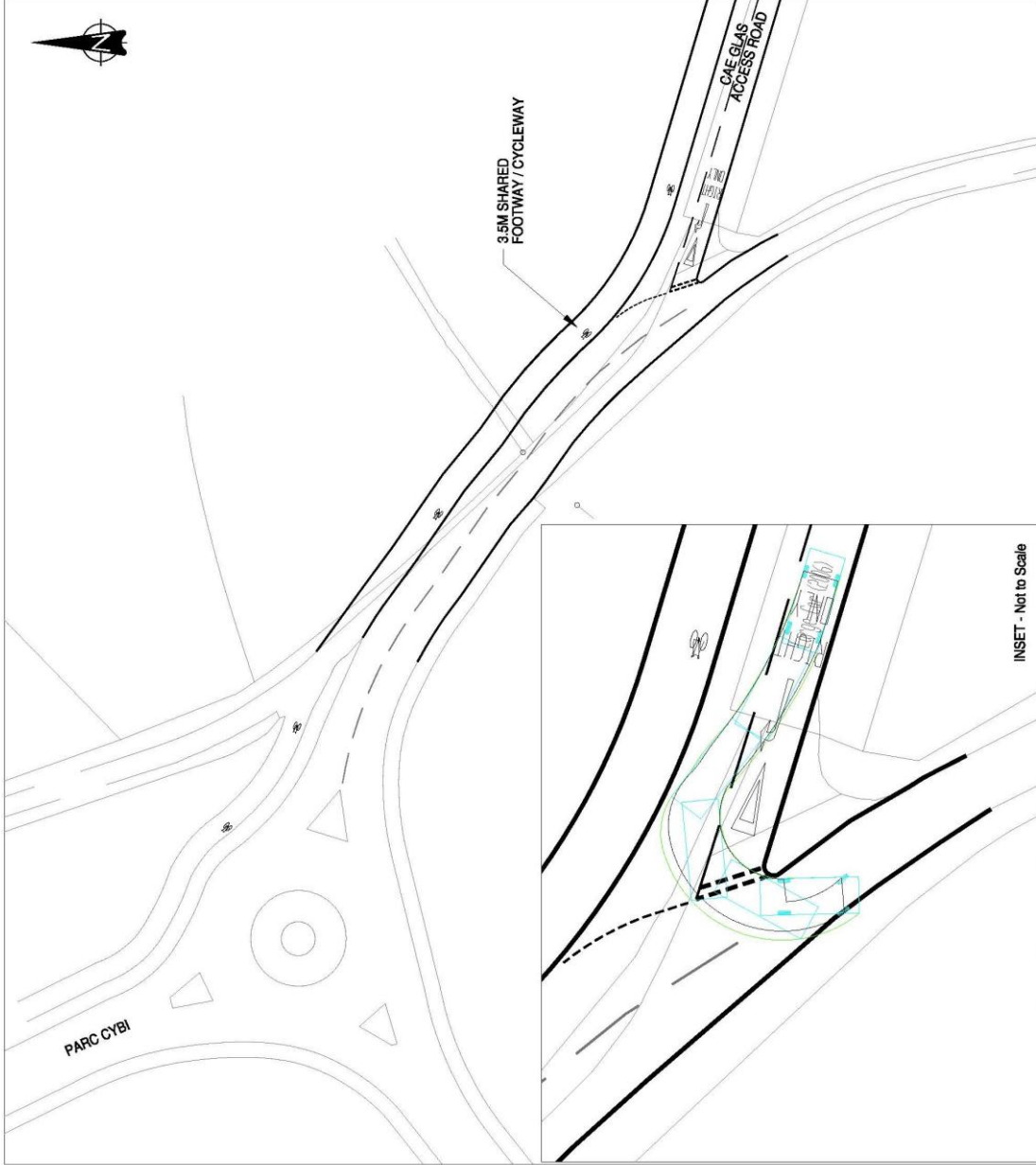
**PRELIMINARY**  
Project: **PENRHOS LEISURE VILLAGE**  
**ANGLESEY**

Dwg Title: **PROPOSED CAE GLAS ACCESS**

Scale:	Size:	First Issue:	Drawn:	Checked:
1:500	A3	12.03.12	CMC	KY

Dwg No: **90145/004**  
Rev: **A**

NOTES:



A	Junction amended to prevent left turn movement, 17.10.13	MF	KY
Rev:	Description:	Date:	By/Child:



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Station: **PRELIMINARY**

Project: **PENRHOS LEISURE VILLAGE  
ANGLESEY**

Dwg Title: **ES FIGURE 5.17  
PROPOSED CAE GLAS ACCESS**

Scale:	1:500	AS	12.03.12	GMC	Checked:	KY
Dwg No:	90145/004			Rev:	A	



**HOW Planning LLP**

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Your ref:  
Our ref: JS/874

30 October 2013

Gwyndaf Jones  
Isle of Anglesey County Council  
Council Offices  
Llangefni  
Anglesey LL77 7TW

**By Post and Email**

Dear Mr Jones

**LAND AND LAKES PROPOSALS AT HOLYHEAD  
APPLICATION REF: 46C427K/TR/EIA/ECON**

I write further to HOW Planning's recent letters dated 22 October and 24 October 2013 in connection with the above planning application.

As part of these submissions, aspects of the very full and highly detailed Officers Report to the 2nd October Planning Committee have been highlighted which summarise and assess the substantial amount of information submitted by Land & Lakes in support of the scheme, in order to directly address the two grounds of objection the Committee identified namely:

- "over development" in the countryside; and
- detrimental impact on the AONB (Area of Outstanding Natural Beauty)

In addition to the information provided in these submissions, Land & Lakes is proposing revisions to the development at Kingsland which further improve the situation. The enclosed revised Kingsland Land Use Parameter Plan (Ref. PL1114.K.PP101 rev C) clearly shows the revised parameters for development proposed by Land & Lakes and the location of areas 1,1A & 2 described below.

Prior to this revision, the majority of the area proposed by Land & Lakes for built development at Kingsland fell within the Holyhead settlement boundary as defined in the Stopped UDP. There were however two areas of the built development which were proposed on land outside of the settlement boundary.

Land & Lakes has given considerable consideration as to whether these areas can be omitted from the proposed developable area. It is possible to omit area 2 but not possible to omit area 1 (as referenced on the attached plan). However, to compensate for this, a larger area of land (referenced as area 1A), which is located within Holyhead's settlement boundary, is proposed to be omitted. The omission of this land provides an increased buffer between the proposed built development and the open countryside to the west, from where there are views over the site (as shown in the submitted Landscape and Visual Assessment). This would serve to further reduce the landscape and visual

+ + + + + + + + + +

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impact of the Kingsland proposals upon the AONB. This added benefit would not be achieved by omitting area 1 as views into this area are over the golf course, which comprises higher land that naturally screens this part of the site.

In total, the developable area will be decreased by 1.034 hectares and to reflect this, the revised number of houses proposed at Kingsland will be reduced to a maximum of 320 (down from 360). This reduction in house numbers is the maximum reduction that Land & Lakes is able to offer and the revision to the proposals reduces the developed area across the entire scheme to approximately 16.5% of the application site.

A review of the submission materials has been conducted and it is confirmed that the reduction in the scale of development at Kingsland does not materially affect the findings of the EIA. Where differences between the information provided and the revised proposals have been identified, they are summarised below.

The assessment of traffic impacts (including the impact of traffic on air quality and noise) has been based on 360 units, meaning that the information presented represents a worst case scenario. Equally, the socioeconomics assessment includes an evaluation on the impact on demand for social and community services, which now also represents a worse case. The LVIA includes two photomontages from the west of the site. These photomontages show dwellings in areas that are now reserved for open space and as such they also represent a worse case assessment. These assessments need not be revised as the scale of development is reduced and any impacts would be lesser in extent or, at worst, remain the same.

The socioeconomics assessment includes an evaluation of the potential local spend from residents of the proposed dwellings and the impact this could have on the creation of local jobs. The reduction in dwelling numbers is anticipated to reduce the number of jobs created by local spending from 40 FTE to around 35 FTE jobs. This is an insignificant change, given the overwhelming job opportunities that the overall development will create, and would not affect any of the conclusions or mitigation measures set out in the ES.

In summary, the changes to the Kingsland scheme have been comprehensively assessed using a worst case scenario in the ES and the overall findings of the report remain valid.

### **Revised Plans**

To reflect the revisions to the proposals described above, please find enclosed the following revised plans for substitution:

- Kingsland Land Use Parameter Plan (Ref. PL1114.K.PP101 rev C); and
- Kingsland Building Heights Parameter Plan (Ref. 232962 - 909 rev E).

### **Overwhelming Support for the Development**

The support for the development has continued to grow since our last submission on 24 October. Whilst you will have continued to receive letters of support for the development, support has also grown in the social media channels as follows:

- An **e-petition** in support of the proposals has currently been **signed by 797 signatures**. This e-petition can be found at:

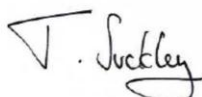
<http://www.gopetition.com/petitions/yes-to-land-and-lakes.html>

- The **facebook page** 'Land and Lakes Anglesey' was specifically created by Land & Lakes for this project and currently has **1,340 likes**. The facebook page can be found at:

<https://www.facebook.com/landandlakesAnglesey>

We request that the information provided in this letter is reflected in the Officers report to Planning Committee and that Members consider it carefully before debating the application at the forthcoming Committee meeting.

Yours sincerely



**JON SUCKLEY**

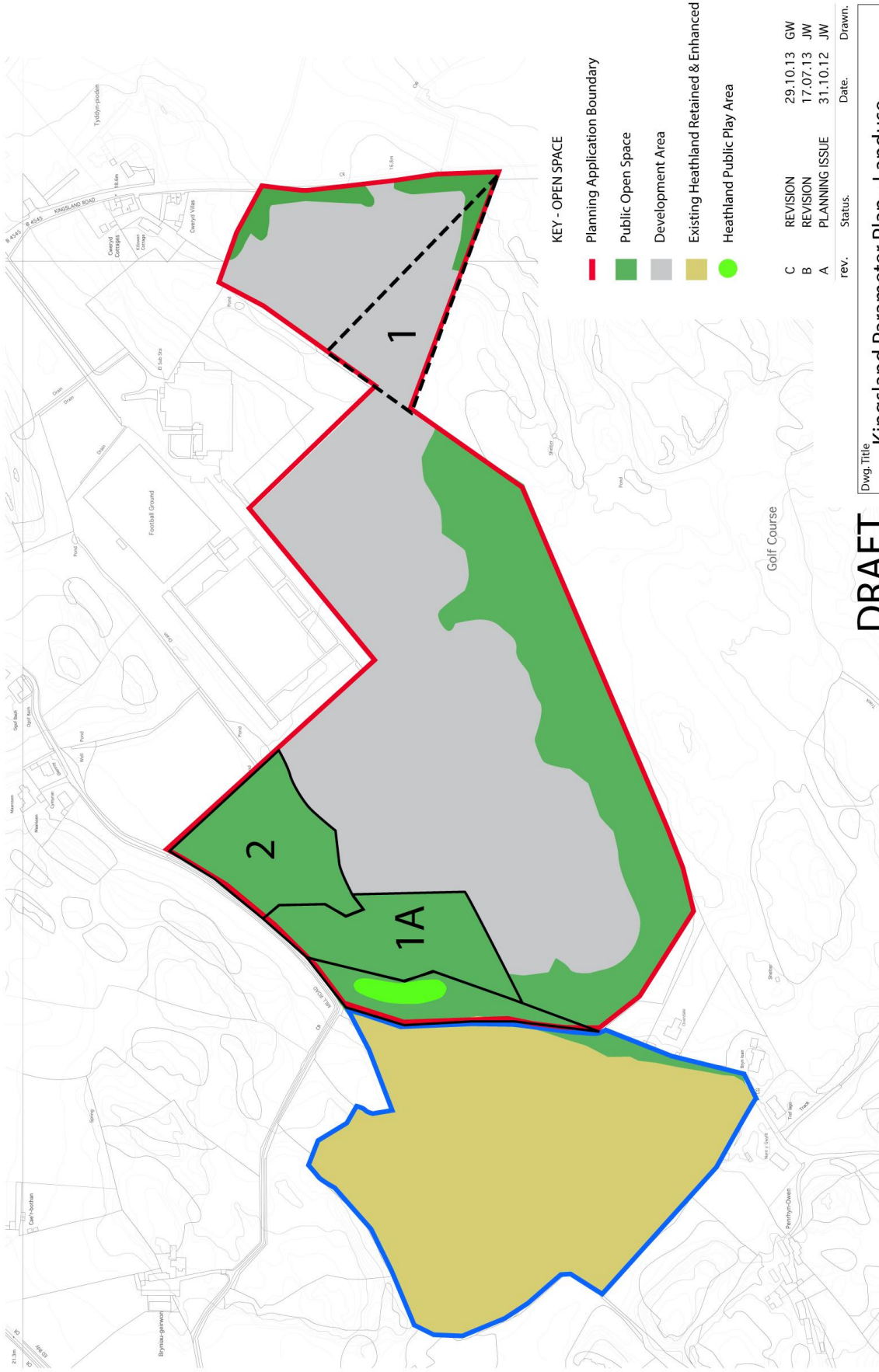
**PARTNER**

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**Email: [jon.suckley@howplanning.com](mailto:jon.suckley@howplanning.com)**

Enc. Kingsland Land Use Parameter Plan (Ref. PL1114.K.PP101 rev C)  
Kingsland Building Heights Parameter Plan (Ref. 232962 - 909 rev E)

Cc: David Pryce-Jones – IOACC  
Richard Sidi – Land & Lakes  
Gary Halman – HOW Planning



**KEY - OPEN SPACE**

- Planning Application Boundary
- Public Open Space
- Development Area
- Existing Heathland Retained & Enhanced
- Heathland Public Play Area

rev.	Status	Date	Drawn
C	REVISION	29.10.13	GW
B	REVISION	17.07.13	JW
A	PLANNING ISSUE	31.10.12	JW

**DRAFT**

Dwg. Title	Kingsland Parameter Plan - Landuse		
Dwg. No.	PL1114.K.PP101	rev. C	Status: PLANNING
Scale:	hts	Date: 29.10.13	Drawn: GW
			Appd: EL

**Notes**

Drawings based on survey data and may not accurately represent what is physically present on site. Accuracy of dimensions are to be verified on site before proceeding with the work.

All dimensions are in millimeters unless stated otherwise.

Final shall be verified in writing of any discrepancies.

**Map File**

1000\_01.dwg

**Key**

- Site boundary
- New Houses
- Primary Roadway
- Secondary Roadway
- Drive Access Roadway
- Shared Surface
- Pedestrian Path



**Kingsland site as Proposed**

Scale: 1:250 @ A1

**Building Heights** (From ground to ridge line)

4m to 5m

Max. Height	Building	Max. Height	Max. Height	Max. Height	Max. Height	Max. Height	Max. Height	Max. Height	Max. Height	Max. Height	Max. Height
4m	4m	4m	4m	4m	4m	4m	4m	4m	4m	4m	4m

Note: The plan above is based on a 5m O.C. site and AOD (Above Ordnance Datum) information.

REV	DATE	BY	CHKD	DESCRIPTION
1	10/01/2024	MM	MM	ISSUED FOR PLANNING

**CLIENT** Land and Lakes (Agency) Ltd

**PROJECT** Purcell Holiday Village

**DRAWING TITLE** Building Heights Kingsland

**SIZE & SCALE** A1/L A4 Stored @ A1

**JOB NUMBER** 232962

**DRAWING NO.** 909

**REVISION** E



1000\_01.dwg - 10/01/2024 10:00:00 AM - 10/01/2024 10:00:00 AM