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Date: 12 October 2018

Our ref: 01234/04/NT/RDv/16450005v1

Your ref:

Dear Ms Sweeney

**Town and Country Planning (Environmental Impact Assessment) (Wales)
Regulations 2017 – Request for a formal EIA Screening Opinion**

Land at Hafan y Môr Holiday Park

On behalf of our client, Bourne Leisure Ltd, we request that the Council provides a formal screening opinion to confirm the requirement for an Environmental Impact Assessment (EIA) in respect of the proposed long-term masterplan for Hafan y Môr Holiday Park. This request is made in pursuance of Regulation 6 of the Town and Country Planning (EIA) (Wales) Regulations 2017 (“the EIA Regulations”).

To enable your consideration of this issue, we set out below the following information:

- 1 Description of the site and its surroundings;
- 2 Description of the proposed development;
- 3 Description of those aspects of the environment likely to be significantly affected by the development;
- 4 Description of any likely significant effects; and
- 5 Any measures envisaged to avoid or prevent what might otherwise have been significant effects on the environment (mitigation measures).

This review is carried out with reference to a preliminary review of the site and its surroundings and a consideration of the issues set out in the Regulations which takes into account recent case law.

This screening request is accompanied by the following plans and documents:

- 1 Appendix A – Site Location Plan
- 2 Appendix B – Parcel Plan
- 3 Appendix C – Illustrative Masterplan

1. Description of the Site and its Surroundings

Hafan y Môr Holiday Park

Hafan y Môr Holiday Park is located on the Llŷn Peninsula, approximately 5km east of the settlement of Pwllheli. Bourne Leisure's ownership at Hafan y Môr extends to approximately 179 hectares. The Park includes 1,025 static caravan pitches, 75 touring pitches and 215 fleet chalets. The Park also includes entertainment, leisure and maintenance facilities.

Hafan y Môr is accessed from a roundabout off the A497. The Birmingham New Street to Pwllheli train line runs through the site. Penychain station is located immediately adjacent to the Park and is a request stop. The All Wales Coastal Path runs along the coast on the southern edge of the site.

The Site

The proposed development will comprise a number of discrete development parcels within the area of the Holiday Park to the south-east of the railway line. For the purposes of this screening, a broad area within which these individual works will take place has been defined. This encompasses the full extent of the Park to the south of the railway line as well as a small area of the beach to the south east. A plan is provided at Appendix A that illustrates the area under consideration.

The area is generally flat and laid out for its use as part of the holiday park. Roads and pathways and other areas of hard landscaping exist throughout the Park as well as extensive areas of planting and soft landscaping. The area also includes shops and other facilities, car parking, play areas and maintenance facilities. The holiday accommodation, that is all one or two storey in height, is laid out throughout the site.

The site includes an area of beach and inter-tidal area.

Further description of the individual location within which development will be brought forward is provided below.

Description of Proposed Development

It is proposed that a hybrid planning application will be submitted – part in detail (full) and part in outline. The total site area comprises 60.46 ha.

We describe below each site in turn along with the proposed development in each area. Drawing 1087/39/1 has been submitted alongside this screening letter to show the overall masterplan proposals.

Outline Projects

Parcel A – Old Stables

This parcel comprises four semi derelict buildings as well as an area of hardstanding and vegetation. The parcel is within an area that is partly surrounded by existing static caravan accommodation. The site is in Flood Zone A (at little or no risk of fluvial or coastal/tidal flooding). A small number of trees and shrubs are located to the south and west of the hardstanding area. The buildings are not listed and the site does not sit within a conservation area. Part of Butlins 2 Candidate Wildlife Site is located approximately 10m to the stables building.

It is proposed to convert the old stables into an area that will accommodate up to 13 static caravan pitches utilising parts of the existing stone walls. Trees will be retained within the site where possible.

Parcel B – Lakeside West

This site is currently occupied by trees – an unmanaged woodland. It is located on the bank of the owners' exclusive fishing lake. An access road runs through the site towards Forest Lodge. The site is in Flood Zone A (at little or no risk of fluvial or coastal/tidal flooding). There are no heritage assets nearby and the site does not sit within a conservation area. The lake and the woodland are identified in the LDP as Candidate Wildlife Sites.

It is proposed to site up to 27 static caravan pitches in this area with the potential for a limited number (up to 3) to be situated on the lake as 'lakehouses'.

Parcel C – Secondary Sales Area

Located to the west of the boating lake, it is currently hardstanding and used for the sale of second hand caravans and for storage purposes.

The site is in Flood Zone A. The boating lake is identified in the LDP as Candidate Wildlife Site. There are no other designations in this area.

It is proposed to site up to 8 static caravan pitches in this area.

Parcel D – Old Chalet Site

The site is currently occupied by four, 2 storey apartment blocks with grass areas and trees located in-between the blocks.

The site is in Flood Zone A. The Special Area of Conservation / SSSI on the coast is located approximately 75 metres to the south east of the site.

It is proposed to demolish the four apartment blocks (56 apartments / 272 guest spaces) and to create an area of parking with associated landscaping.

Parcel E – Boating Lake Site

This parcel adjoins the northern end of the 'Boating Lake' and is located adjacent to the existing 'Bonga Wonga' central facilities building (the area of which is subject to enhancement under current application ref. C18/0619/40/LL). The site currently comprises an area of car parking.

This parcel forms part of planning permission ref. C10D/0141/40/LL for which extant consent exists for the development of 18 pitches. The Parcel is now included in this new masterplan for the Park to reflect the updated pitch numbers and layout proposed.

Within this parcel it is proposed to develop up to 24 new static caravan pitches with associated internal access road, car parking and landscaping.

Parcel F – Beachside Site

This parcel is located between the existing 'Waterside' and 'Cardigan Bay View' caravan communities on the Park. The site is bound to the east by the coast.

This parcel forms part of planning permission ref. C10D/0141/40/LL for which extant consent exists for the development of 14 pitches. The Parcel is now included in this new masterplan for the Park to reflect the updated pitch numbers and layout proposed.

Within this parcel it is proposed to develop up to 15 new static caravan pitches with associated internal access road and landscaping.

Parcel G – East of Existing Sewage Treatment Plant

The site comprises two fields, separated by established planting. The site is to the east of the existing sewage treatment plant and will be to the west of the new sewage treatment plant once completed. The access road to the new sewage treatment plant will run through this parcel.

Planning permission exists for the development of 71 static caravan pitches on the north western extent of Parcel G and Parcel I (ref C10D/0141/40/LL).

The southern extent of the site is located adjacent to the Pen Llŷn a'r Sarnau Special Area of Conservation (SAC) and SSSI. The site is in Flood Zone A.

Within this area it is proposed to site up to 90 static caravan bases with associated access and landscaping.

Detailed (Full) Projects

Parcel H – Site of Existing Sewage Treatment Plant (STP)

This site is currently occupied by the existing STP located on the beachfront, overlooking the Wales Coast Path. An access road runs through the site to the STP. A tree belt exists along the southern part of the western boundary, to the south of the railway and along the eastern boundary.

The site of the existing sewage treatment plant is located adjacent to the Special Area of Conservation and the SSSI.

Full planning permission (C17/0739/40/LL) was granted on 21 September 2017 for the demolition of the STP and the construction of a new plant to the north west of the site. A new access road is to be constructed through Parcel G.

The site is in Flood Zone A.

Within this area it is proposed to erect a new beach café with terrace, a play area and a car park. Landscaping will be introduced around the built form and a landscaped green corridor is to be retained along the stream that runs along the north-eastern boundary. The Wales Coast Path will be protected and enhanced.

Parcel I – Site North of Existing STP

The north-west to north-east boundaries of this parcel comprise a tree belt with a stream. The parcel is bound to the north by the railway line and the south by existing static pitches and chalet buildings which provide staff accommodation.

This parcel forms part of planning permission ref. C10D/0141/40/LL as alongside part of Parcel G, extant consent exists for the development of 71 pitches. The Parcel is now included in this new masterplan for the Park to reflect the updated pitch numbers and layout proposed.

It is proposed to develop 47 new static pitches in this parcel with associated internal access roads, car parking spaces for each pitch, soft landscaping and associated infrastructure (above and below ground).

Parcel J – Coastal Defences

The coastal defence parcel comprises a short stretch of coastline extending from the northern end of 'Cardigan Bay View' to the site of the new STP to the east. The Wales Coast Path runs through the site behind

the defences to the south and in front of the defences to the north. This parcel is located within the Pen Llyn a'r Sarnau SAC and in part the Glanllynau a Glannau Pen-ychain I Gricieth Site of Special Scientific Interest (SSSI).

The proposed development comprises works to a 320m stretch of the coastline including 'fish-tail' shaped rock-armour breakwaters and intervening areas of sand/gravel beach recharge. The coastal defence project achieves an innovative net landward realignment of the shoreline in order to minimise the extent of any intertidal habitat losses or coastal effects. Around a third of the length of these proposed breakwaters and recharge areas will be placed along an existing 120m section of existing linear rock revetment that is present along this part of the foreshore (as constructed in the 1990s). As a result of this part of the design change there will be a net landward retreat of the mean high water spring (MHWS) alignment.

Landscaping

A comprehensive landscaping scheme is proposed that will sit alongside the development. This will assist in screening the proposed development from viewpoints such as the railway and the coastal path. The development scheme seeks to make efficient use of some of the underutilised areas of the park.

Summary of Works

To summarise, it is proposed to seek full planning permission for the following development (Parcels H – J):

- 1 Beach Café, terrace, play area and car parking;
- 2 47 static caravan pitches; and
- 3 New coastal defences.

Outline planning permission is to be sought for the following development (Parcels A – G):

- 1 Creation of up to 177 static caravan pitches; and
- 2 Demolition of 56 existing chalet apartments.

Whilst the masterplan includes up to 224 static caravan pitches, as set out above, there is extant permission in some of the proposed masterplan areas to develop 103 pitches. Not all of the proposals permitted by the 2011 planning permission (ref. C10D/0141/40/LL) have been implemented to date. Alongside the static pitches, 240 apartments in Llyn Village chalets remain on-site (the 2011 permitted demolition and development of 96 static pitches). The Table below sets out the unit numbers from 2010 (the 'existing situation' at the time the 2010 application was made), the 'approved' position (as per the 2011 permission), what has been built on-site in each of the areas (the 2018 'existing situation') and what is proposed by the masterplan.

	2010 Existing Situation	2011 Approved	2018 Existing Situation		Proposed Change	Masterplan
Areas as set out in the 2010 Planning Application						
Existing Statics/Lodges	857	857	857		-4	853
Glaslyn and Tryfan	15	15	15		0	15
Elwy, Parklands, Afon Gardens	134	38	63		0	63
Cardigan Bay (East of Llyn village)	29	33	30		0	30
The Fairways (incl. 27 building now) and Golf Village		75	75	69 built-out	0	75
Llyn Village	286	96	96	240 chalets on-site	-11	85
The Stables	45	45	45		0	45
Summit Park (Tourers)		75	75		0	75
STP Site (South of railway line)		71	71	0 built-out	66	137
New areas included in 2018 Masterplan						
Secondary sales area					8	8
Lakeside West					27	27
Old Stables					13	13
TOTAL	1366	1305	1327		99	1426
Net change on 2011 Approved						121
Net Change on 2010 Existing						60

The Table shows:

- 1 between 2010 and 2018 the number of units has decreased by 39;
- 2 by combining the elements of the 2011 permission, which are still to be implemented, with the masterplan proposals results in a net increase of 99 units compared to the total approved in 2011;
- 3 when compared to the numbers which previously existed on the site (the '2010 existing situation') the masterplan proposes only a 4.4% increase in unit numbers overall;
- 4 further back, the site operated as a Butlins with an estimated population, at peak, of 18,000. This is significantly higher than the situation today.

Requirement for EIA

The development is one to which the EIA Regulations may apply because it falls within Schedule 2 as a 'Holiday village and hotel complexes outside urban and associated developments' where the area of development is more than 0.5 hectare.

For Schedule 2 developments, the Regulations require that an EIA be undertaken where "*the development is likely to have significant effects on the environment by virtue of factors such as its nature, size or location*". Schedule 2 developments are not automatically subject of an EIA.

Welsh Office Circular 11/99 establishes that the likelihood of significant effects on the environment from a proposed development must be considered on a case by case basis. In relation to developments within Category 12 (c) the Circular states that in assessing the significance of tourism development, visual impacts, impacts on ecosystems and traffic generation will be key considerations. EIA is likely to be required for major new tourism and leisure developments which require a site of more than 10 hectares. In particular, EIA is more likely to be required for holiday villages or hotel complexes with more than 300 bed spaces, or for permanent camp sites or caravan sites with more than 200 pitches.

In determining whether the development is likely to give rise to significant environmental effects, reference should be made to Schedule 3 of the Regulations. This identifies three categories of criteria:-

- 1 Characteristics of the development (such as size, cumulative effects, use of natural resources, production of waste, pollution and nuisances, risk of accidents and risk to human health);
- 2 Location of the development (by reference to the environmental sensitivity of the area); and
- 3 Characteristics of the potential impact (having regard in particular to the extent of the impact, its transfrontier nature, magnitude and complexity, probability and duration, frequency and reversibility).

Development Characteristics

Environmentally Sensitive Locations

Parcel J is located partly within the Pen Llyn a'r Sarnau SAC and, in part, the Glanllynau a Glannau Pen-ychain I Gricieth Site of Special Scientific Interest (SSSI) which are designated for their marine and intertidal habitats. Other parcels (F, G and H) are located adjacent to these designated areas.

Characteristics of the Potential Impact

Biodiversity

Methods & Scope of Assessment

Field surveys and desk-based assessments are being undertaken by qualified ecologists (Dr Peter Tattersfield PhD CEnv MCIEEM, Andrew Pearson MSc MCIEEM and Colin Scott MSc MCIEEM), to understand any potential ecological impacts that may arise from the proposed development projects. Dr Peter Tattersfield has been examining the terrestrial ecology with Andrew Pearson and Colin Scott (of ABPmer Ltd) considering the marine ecology.

The scope of the terrestrial ecological assessment, including the range of field surveys to be conducted, has been defined by conducting a desk-based study of environmental information, and via consultation and agreement with Gwynedd Council's Senior Biodiversity officer. The desk-based study has covered the proposed development sites, plus the surrounding area extending for 1km around them. It has drawn on the results of several previous ecological surveys at Hafan y Môr, and also on up-to-date information on

priority/protected species and designated sites provided by Cofnod (the Local Environmental Records Centre for North Wales).

The terrestrial site-based surveys comprise: habitats & vascular plant flora (including non-native and potentially invasive species), otter, bats, badger, reptiles, breeding grassland birds and barn owl. These surveys have been agreed with Gwynedd Council's Senior Biodiversity officer.

Two baseline surveys of the foreshore habitats were also carried out in 2016 by ABPmer. These covered the project site and areas between Porth Fechan beach and the mouth of the Afon Wen (as reviewed within separate reports (ABPmer 2016 and 2017)). The aims of these surveys were to:

- 1 Produce a broad-scale map the foreshore habitats covering the area of the proposed breakwater development and the adjacent shoreline (which could be directly or indirectly affected by the scheme); and
- 2 Confirm the presence and distribution of any designated SAC interest features, rare species or nationally important biotopes under the footprint of the works or within its future influence;

The survey approach was based on the standardised Phase 1 mapping methodology as detailed in the Marine Monitoring Handbook, Procedural Guidance No 3-1 and CCW Handbook for Marine Intertidal Phase 1 Survey and Mapping. The landward boundary of this survey was Mean High Water Springs (MHWS). The seaward boundary was the lowest part of the shore which could be accessed safely at the time of low water using waders.

Key Biodiversity Issues

Several potentially sensitive ecological 'receptors' have been identified within the likely zone of influence of the proposed development, these being as follows.

Designated Sites

Statutory Designated Sites - Parcels F, G and H lie adjacent to and Parcel I lies partly within, the Llanllwynnau a Glannau Pen ychain I Gricieth SSSI, which also includes part of the European site Pen Llyn a'r Sarnau/Lleyn Peninsula and the Sarnau Special Area of Conservation (SAC). In terms of habitats, these sites are designated for their marine and intertidal habitats (and geology (SSSI)).

The footprint of the Hafan y Môr coastal defence scheme (Parcel J) includes areas either side of the tidal margins. It extends up to 30m into landside areas and up to 20m into the upper intertidal zone below the mean high water spring elevation. The habitats within this footprint and across the wider environs have been surveyed on behalf of Bourne Leisure Ltd. (ABPmer 2016; 2017; Tattersfield in prep) and from these surveys and other published information a good understanding exists about the ecology and nature conservation value of the site.

The intertidal area at Hafan y Môr is a sheltered crenulated shaped beach consisting of rock and shingle at either end of the bay, within which is a zoned beach of sand and mud/shingle (CCW, 2004). The upper shore where the proposed breakwater structures will be placed is mainly littoral sand and barren shingle habitat. These habitats are generally impoverished and have a low biodiversity (ABPmer 2017). Lower down the foreshore and away from the development site, the habitats change with alteration to tidal elevation, sediment type and the level of consolidation. At the top of the shore there is quite a lot of broken concrete and general debris within the upper shore material. This foreign material will be removed and used in the hinterland landscaping.

Sheltered beaches such as Hafan y Môr have characteristic fauna including polychaetes *Lanice conchilega*, *Scoloplos armiger*, *Arenicola marina*, *Clymene oerstedii* and *Pygospio elegans* as well as the bivalves *Cerastoderma edule* and *Angulus tenuis* and the amphipod *Corophium arenarium* (Mills, 1998). Phase 1 intertidal habitat surveys by ABPmer (2016 and 2017) described the range of habitats and species present from Porth Fechan beach in the south-west to the Afon Wen in the north-east. These surveys describe the intertidal zonation and habitats which include honeycomb worm *Sabellaria alveolata* reefs and species-rich under-boulder rock communities. *Sabellaria alveolata* is an Annex I feature of conservation importance within the Llyn Peninsular and Sarnau SAC as well as being a species that Welsh ministers should enhance and maintain under Section 7 of the Environment (Wales) Act 2016.

Between the reef patches, expanses of intertidal sandflat habitat were observed. The sandflats consist mainly of 'clean' sand habitat with a relatively impoverished polychaete-dominated community characterising much of the area. Several eelgrass (*Zostera marina*) beds were also recorded in localised areas of the foreshore. As well as being sub features of the Special Area of Conservation (SAC), these habitats are also Biodiversity Action Plan (BAP) Priority Habitat and listed as Habitats of Principal Importance in Wales.

Non-statutory Designated Sites – Parcel B partly overlaps a lake within the Butlins 2 Candidate Wildlife Site (CWS), Parcels A, C and E are sited adjacent or very close to the same CWS, although, the assessment has indicated that no high value habitats or species would be affected. Parcels G and I are situated close to (within 20-30m) of the Butlins 1 CWS, but they are separated by an active railway line and would not be affected in any way by the proposals.

Habitats

Habitats & plant communities and vascular plant species - no nationally or locally uncommon or protected plant species would be affected, and most of the proposed developments would affect only low value habitats.

However, the proposed static caravan development on Parcel G, and the coastal/beach works would result in the loss of an area (c.3.6ha) of neutral grassland (lowland meadow), which is assessed as a County value habitat 'of key significance to sustain and improve biodiversity in relation to Wales', as defined under Section 7 of the Environment (Wales) Act 2016) ('Section 7 species'). Opportunities to compensate or mitigate for this impact are currently being investigated, although based on the current proposals this would represent a significant loss at the County level.

Several non-native and potentially invasive plant species have been recorded including Himalayan balsam, false Virginia creeper and montbretia, all of which are listed on Schedule 9 of the Wildlife & Countryside Act 1981.

Species

European Otter

The otter is a UK and European protected species, and it is also identified 'as a qualifying feature, but not a primary reason for selection' of the Pen Llyn a'r Sarnau/ Llyn Peninsula and the Sarnau SAC.

The survey is on-going, but results to date indicate that otters forage and have resting places on the fishing lake that is partly within Parcel B. Otters also use the watercourse that runs between Parcels G, H and I, for resting, foraging and commuting. The surveys have not identified any evidence that otters breed at either of these locations. No evidence of otter has been recorded on the highly disturbed boating lake that is located adjacent to Parcel E.

It is clear from the surveys and desk-based information that otters are widespread and common in the surrounding area, and that lying-up opportunities are likely to be ubiquitous. Based on the current proposals, minimal adverse impacts are predicted as, based on current survey data, breeding is considered unlikely and otters can tolerate relatively high levels of disturbance. No significant adverse impacts on the status of otters within the SAC are considered likely.

This watercourse is shown as the proposed 'green corridor' channel behind the defences (see Appendix C).

Otter populations in coastal areas use shallow, inshore marine areas and therefore a gap has been included between Groynes 3a and 3b in the scheme design to ensure that this species, if present, still has access between the channel and the coastline.

Construction will involve significant earthworks. Otters are inquisitive animals and may be attracted to work sites during the construction phase to investigate new machinery or spoil heaps etc. Otters therefore risk becoming trapped in any pits or piping.

Bats

All bat species are protected by UK and European legislation. Several species are known to roost at Hafan y Môr. Daubenton's bats forage over the two lakes (Parcel B) and there are also small, non-breeding day roosts and night roosts within buildings in Parcel A (at least 3 species).

A statutory licence and measures to replace any affected roosting sites would be needed to maintain the local conservation status of the bat populations. Mitigation and compensation measures would need to be defined when detailed proposals are submitted, although they are likely to be relatively straightforward, involving the integration of replacement roosting sites within any new or retained buildings, and/or the installation of bat boxes. Standalone replacement night roosts may also be required for Lesser Horseshoe bats, unless satisfactory provision can be delivered within building roof voids. These measures are likely to satisfactorily mitigate any impacts caused by the loss of the existing roosts, and would maintain the local conservation status of the bat species involved.

Reptiles

Four reptile species have been recorded at Hafan y Môr Holiday Park, all of which are afforded limited protection under UK legislation, and are also listed on Section 7 as 'living organisms of principal importance for the purpose of maintaining and enhancing biodiversity in relation to Wales', as defined under Section 7 of the Environment (Wales) Act 2016.

Slow worms are present on Parcel A, and common lizards occur on parts of Parcel G. These two species plus adders and grass snakes occur in Parcel I, which supports the largest reptile populations on the site.

Mitigation measures would be needed prior to site clearance, involving either a habitat management approach to facilitate the displacement of reptiles, or a trapping and translocation programme. Similar reptile mitigation measures have been undertaken prior to previous developments at Hafan y Môr, and a relatively large receptor area has been established into which reptiles could be transferred, after the completion of additional habitat enhancement works.

Badger

Badgers and their setts are protected under the Protection of Badgers Act 1992. Although badgers are known to occur within the Holiday Park, no setts have been located within any of the proposed development parcels and no impacts are predicted.

Birds

Most of the proposed development parcels support common bird species and standard measures (e.g. careful programming of clearance works) will be needed to ensure that nests are not harmed during site clearance. A survey of breeding grassland birds, such as skylark, has been undertaken in Parcels G, H and I but no evidence of nesting was recorded.

A barn owl (Wildlife & Countryside Act 1981, Schedule 1) has been recorded roosting in one of the buildings at the Old Stables (Parcel A) although there is no indication of breeding activity. If this roost needs to be removed then compensation measures could consist of the installation of at least one barn owl box at an appropriate location and as close to the Old Stables as possible, or the incorporation of replacement roosting provision within any retained or new buildings. Such measures should succeed in maintaining the conservation status of barn owls in the local area.

Marine Mammals

All cetaceans and turtles in UK water are European Protected Species (EPS). Eighteen such species of cetacean have been recorded in Welsh waters since 1990 (Baines and Evans 2012). Commonly sighted species in the Irish Sea include: Risso's dolphin (*Grampus griseus*); bottlenose dolphin (*Tursiops truncatus*); harbour porpoise (*Phocoena phocoena*), white beaked dolphin (*Lagenorhynchus albirostris*) and short beaked common dolphin (*Delphinus delphis*). Harbour porpoise are observed year round within the Irish Sea and (as an Annex II species) is also the primary reason for the selection of the new West Wales Marine SAC (around 23 km from the proposed development site). Leatherback turtle is a seasonal visitor to Cardigan Bay and can be sighted offshore during the summer months.

Two species of seals live and breed in UK waters: grey seals (*Halichoerus grypus*) and harbour (common) seals (*Phoca vitulina*). Both species are listed under Annex II of the EC Habitats Directive and are EPS. Both species are Annex II features of conservation interest for the Cardigan Bay SAC (60 km from the proposed development site) and grey seal are qualifying feature for the Llyn Peninsular and Sarnau SAC and may be present within the area surrounding the proposed coastal defence scheme. Grey seal were sighted foraging and resting (floating) during the site specific ecological survey work (ABPmer 2017).

There is not expected to be any adverse impact to seals, cetaceans or turtles because the construction works will be too high up the foreshore to cause any significant disturbance to these species. The breakwaters will also be installed using land-based vehicles and no impacts to underwater noise or vibration levels will arise from marine activities. For the same reasons, and also due to the infrequency of sightings, no impacts on turtle species are expected.

Waterbirds

Approximately 1.8 km offshore from the scheme area is the Northern Cardigan Bay SPA and is proposed for designation for Overwintering Annex I Species Red-throated diver (*Gavia stellate*). It is noted also that habitats within the Llyn Peninsular and Sarnau SAC support resident and migratory birds and marine species. Birds recorded during habitat surveys include Little Egret (*Egretta garzetta*), Grey Heron (*Ardea cinerea*), Oystercatcher (*Haematopus ostralegus*), Turnstone (*Arenaria interpres*) and European herring gull (*Larus argentatus*). Several flocks of auks (*Razorbills Alca torda* and Guillemot *Uria aalge*) were also recorded foraging offshore (ABPmer 2017).

The construction work for the sea defences will be carried out in the winter months but they are not expected to have a significant effect on overwintering or passage waterbirds from the changes to or losses of habitats or, alternatively, from disturbance effects. This is because of the location of the development as well as the habitats and designated sites within and surrounding the construction area. The Northern Cardigan Bay SPA

for example is too far away to be affected. Appropriate consideration will be given to breeding birds with preparatory land management mitigation measures if the works are to be conducted between March and July.

Trees

An Arboricultural Assessment is being prepared to assess the impact to trees across the areas within the Hafan Y Môr Holiday Park. Some tree removal will be required in all areas although it is noted that the majority of trees are of low value due to either their condition or young age and can be mitigated for with replacement tree planting. Each area varies in trees composition and density, although all are situated within the Park and therefore have limited amenity value within the wider landscape and to the general public. Areas G, H and I are also visible from the coastal path although the larger boundary groups are to remain and therefore the continued screening to the railway line and wider landscape to the east will not alter dramatically. The small wooded section within area B is one of the larger areas where tree removal is required. However, it comprises relatively young trees that could be removed without any significant impact and could easily be replaced nearby to enhance other areas of tree cover.

Land, soil, water, air and climate

Foul Drainage

All the foul drainage from the existing Hafan-y-Môr Caravan Park is conveyed by pumped systems to an existing STP (Parcel H) located on the coastline on an area which is protected by a rock armour revetment. This STP has the benefit of consent from NRW for the discharge of treated effluent from the plant via a long sea outfall into the sea.

The existing STP is currently being replaced with a new STP located to the north east of the proposed extension to Hafan-y-Môr Holiday Park, immediately to the south of the railway and the construction work for the new plant is currently ongoing ready for commissioning in 2018 and followed by decommissioning of the existing plant.

The new sewage treatment plant has the benefit of planning consent C17/1739/40/LL and is being constructed and installed in accordance with that consent. In particular, the tanks of the new plant are contained within a landscaped bund screen which is additional to existing tree screening.

The new plant is sized adequately to cater for all of the new proposed caravan development and facilities and is the subject of a new consent to discharge issued by NRW for this uplifted quantity of treatment and discharge of treated effluent. There is also a further consent issued by NRW for the discharge of overflow water during peak rainfall conditions and currently there is an active programme of infiltration removal across the existing park to gradually bring down the flow rates to the new plant and minimise the use of the consented overflow.

The old and new STP are private plants. The existing plant currently operated and maintained by Veolia under contract to Bourne Leisure/ Haven and it is proposed that a similar arrangement will be put in place to ensure sound management of the new facility at full compliance with the current and new consents issued by NRW.

All the foul pipe work on the existing Park is on a separate system from surface water and the new proposed areas will be similarly provided with a totally separate foul and surface water system such that surface water will not be allowed to enter the foul treatment and foul sewage will not be allowed to enter the surface water which discharges ultimately to adjacent water courses and to the sea. This is to prevent contamination of the water courses and the sea.

Surface Water

Currently surface water from the existing Park is conveyed in a network of private pipes to various areas of discharge. These are as follows:

- 1 The rock gardens into an open water course and from there under the railway into a water course running westwards.
- 2 The westwards running course collects other areas of the park to the south of the railway and ultimately discharges into the stream/ river running westwards away from Hafan-y-Mor and ultimately out to sea after passing through various parcels of land.
- 3 Discharges from the recently constructed touring area are into an open water course which runs southwards and into pipe-work through the Cader Idris caravan community.
- 4 This pipe-work collects other areas of surface water and discharges southwards under the railway into the head of a stream which commences as an overflow from the boating lake and runs eastwards and gathers surface water generally from run-off. This then turns southwards into a main stream which runs out to sea to the east of the existing Sewage Treatment Plant.
- 5 Other areas of the holiday park to the south of the railway are gathered and discharged into the natural lake and the boating lake.
- 6 There is a further 450mm diameter discharge pipe running under the Cardigan Bay caravan community which is historic and collecting surface water from the vicinity of the staff chalets and the general collection area by the railway and this discharges to sea.

All of these various water courses and conveyance systems are currently being examined and improvements carried out to ensure that they are functioning fully. This is part of a 2-3 year programme of which year 1 is now complete and good results are being obtained from the investigation to pick up old areas where maintenance is required and carrying out such maintenance to ensure there is a sound existing system across the existing Park.

The main proposed caravan extension to the Park to the south of the railway (Parcels G and I) will be drained by a sustainable system utilising large diameter perforated pipe work and storage crates discharging to ground to replicate the green field scenario which currently exists and with surplus discharges being screened and collected to discharge into the main stream which also takes a tributary water course running down the northeast boundary of the eastern field which then turns westwards to join the main stream prior to discharge to sea.

All the existing water courses are the subject of regular maintenance and clearance at agreed times of the year to ensure that ecological habitats are respected and to ensure that they have the full capacity provided for discharge currently and with the future development.

The smaller “satellite” areas of development which are proposed around the existing caravan park are to be dealt with similarly at connecting surplus water after attenuation into the available discharge positions, either conveyed water courses and pipe work or the lake and other similar water bodies.

Cultural heritage

There are no heritage assets within or in close proximity to the development site. The nearest heritage asset is the Grade II Penychain Farmhouse (CADW ID 21337) and its associated listed buildings. The buildings are located approximately 450m to the west of Area A. The proposed development site is not located in a conservation area.

Landscape and visual effects

The proposed development parcels are predominantly self-contained within the main body of the holiday park and, with careful site planning, sensitive material choices and appropriate infrastructure landscaping, can be fully integrated with their immediate environs with little or no impact on the wider landscape.

The principal receptor is the Wales Coast Path and the interface of the proposed development parcels with this national footpath needs to be carefully considered. There are distant views from the railway and public beach areas and sea views, but all these views are seen against the backdrop of the existing mass of the Park. However, the Wales Coast Path passes close to several of the development parcels and, as such, is likely to be affected the most in an adverse or beneficial way.

The proposed development Parcels A, B, C, D, E, F and I will be integrated into the Park, with limited impact.

The already permitted demolition of the existing STP and proposed replacement of this with a Beach Café (Parcel H) represents a significant beneficial impact for receptors, improving overall amenity and first impressions when approaching the Park from the east. The redevelopment of this area, in conjunction with beach enhancements and coastal defence works (Parcel J), will further increase the amenity value of the Park and coastal path receptors passing the site.

The proposed development in Parcel G extends the holiday park to the east, infilling an area of largely self-contained fields surrounded by mature tree belts which, supplemented by recent screen planting implemented as part of the sewage treatment plant works, will sit relatively comfortably in the landscape. Additional planting and reinforcement of the eastern boundary would be beneficial to strengthen the narrow belts of planting nearer the coast to mitigate any potential impacts. However, overall receptor views towards the east of the Park will remain largely unchanged, towards a heavily wooded and planted eastern boundary.

The proposed coastal defence work (Parcel J) extends in front of Parcels G and H. Parcel J will involve the creation of rock groynes and areas of sand and gravel, sensitively shaped and integrated into the existing coastline. This work will create a localised change in the form of the landscape but the materials will all be natural and compatible with adjacent landscape treatments so the principal components in the view will be very similar. The groyne features are no more than 3m high and do not break the cliff line when viewed from the sea or travelling east or west along the coastal path. The beach areas between the groynes will become more useable and sheltered in places with a perceived benefit in terms of landscape character. (In the medium to long term this could be beneficial as it will prevent the erosion/loss of the coastal path).

The creation of the groynes and beaches will create a change in the coastline morphology/seascape and the interface between the beach and the sea as arable land flanks an extensive and relatively open stretch of beach extending down from Criccieth to and along the frontage of the park and then onto the more rugged and steeper slopes with narrow beaches that are characteristic below the golf course. The extension of the groynes and recession of the beaches contains elements of both these type areas and thus provides a natural and sensitive transition.

The implementation of the coastal defence works will generate circa 25,000m³ of material and this will be distributed evenly over undeveloped internal areas of the existing holiday park, predominantly in Parcel F at a height of 300-400mm high. Bearing in mind the very nominal increase in ground level over an extensive area there will be no significant impact on landscape character or visual amenity as Parcel F is set back from the coastal path behind existing mature tree belts.

Finally, in terms of potential cumulative impacts and seeing a number of the development parcels simultaneously, this is only really evident in relation to Parcels G, H and J. Travelling east, these Parcels can be seen from sections of coastal footpath by the Owners' Exclusive lake and similarly travelling west when

adjacent to Parcel G, these three areas can be seen together to some degree but they are seen as part of an existing developed park frontage already perceptible to receptors. The introduction of the coastal defence and beach areas represents a change in form and character but a change that is compatible with its immediate environs that with sensitive design could yield beneficial effects.

Transport

IEMA guidelines state that a 30% traffic increase is the typical point at which an assessment is required, although not explicitly stated within the revised guidance this does provide a sensible proxy and evidence base to negate any further assessment. The level of new traffic that may be generated by proposed development falls well below this threshold and it is, therefore, considered that any impact will be imperceptible, particularly as trips will tend to occur outside of highway network peak hours.

Hafan y Môr is accessed directly from the A497 via a dedicated roundabout and short approach road. The A497 is the key route between Porthmadog and Pwllheli carrying a range of vehicles, hence the impact of the proposals is considered to have a negligible impact on existing traffic levels and therefore, there are not considered to be any local receptors sensitive to minor increases in traffic potentially generated by the development proposals. It should also be highlighted that the A497 currently carries a large proportion of the local and regional HGV traffic, with junctions designed to accommodate such vehicles, therefore any additional HGVs required during the construction of the proposals would likely have a negligible impact on both the operation of the A497 and any sensitive receptors that may be identified.

The Park is located directly on the coast, with access available on foot to nearby beaches and coastal paths – a key attractor for visitors looking to stay at the park. The Park also offers a wide-range of on-site facilities, including indoor pool, cafes, restaurants, shops, sports facilities and children's clubs. The need for residents to travel off-site via car during their stay is therefore minimised. Within the Park a comprehensive network of footpaths, low vehicle speed limits and traffic calming all encourage an environment that favours walking and cycling.

The Park is located close to the Penychain railway station, which offers services between Pwllheli and Machynlleth every two hours, with a number of these extending as far as Shrewsbury and Birmingham International. Timetabled buses (every 15 minutes) also call at the Park's main entrance, which provide further connectivity between Porthmadog and Pwllheli. It is, therefore, considered that there are already a wide range of options for visitors to use sustainable transport modes to access the site and to travel to other local facilities and services.

The scale of the proposed development, off-peak trip generation, its location and lack of neighbouring receptors, on-site and nearby amenities accessible on foot, and connectivity via rail and bus combine to result in a development that will not perceptibly alter the number of vehicles that currently enter the local area. Existing infrastructure is considered to be sufficient to handle an increase in demand. A standalone Transport Assessment will examine the relevant effects and this will accompany any planning application.

Population and human health

The development will increase the number of accommodation units within the holiday park by 121. This will result in minor increase in the tourist population during the holiday season but it is not anticipated that this would have any detrimental impact upon local facilities such as schools. The development would result in an increased number of jobs which will benefit the local area.

The nature of the development will not have any direct impact upon human health.

Planning Submission

Any planning application would be accompanied by the following documents:

- 1 Application forms, certificates and appropriate application fee;
- 2 Plans, elevations and sections for the areas that are applied for in full;
- 3 Parameter plans for the areas that are applied for in outline;
- 4 Landscaping details;
- 5 Planning Statement;
- 6 Design & Access Statement;
- 7 Ecological Assessment;
- 8 Landscape & Visual Impact Assessment;
- 9 Arboricultural Survey;
- 10 Transport Statement;
- 11 Carbon Management Statement;
- 12 Welsh Language Impact Assessment;
- 13 Flood / Drainage Statement;
- 14 Pre-Application Consultation Report.

Conclusion

We trust that you have sufficient information to determine whether this is an EIA development under the Town and Country Planning (EIA) (Wales) Regulations 2017. From these Regulations, we note that the local authority has three weeks (beginning from the date of receipt) to form a screening opinion and to provide the main reasons for this opinion having regard to the relevant criteria listed in Schedule 3. If adopting a negative screening opinion, we note that the LPA must also state any features of the proposed development and measures envisaged to avoid and prevent what might have otherwise been, significant adverse effects on the environment.

Please contact Rachel Davies or me if you have any questions.

Yours sincerely



Arwel Evans
Senior Planner

Enc – Illustrative Masterplan (1087/39/1)
Site Location Plan (1087/39/7)
Parcel Plan (1087/39/6)