

REPORT

Holyhead Waterfront Regeneration Scheme ES

Appendix 6.1: Environmental Scoping Report

Client: Conygar Holyhead Ltd.

Reference: PB8908-RHD-ZZ-ZZ-RP-Z-0034

Status: Final/P01.01

Date: 14 June 2021

REPORT

Holyhead Waterfront Regeneration Scheme

Environmental Scoping Report

Client: Conygar Holyhead Ltd.

Reference: PB8908-RHD-ZZ-XX-RP-Z-0027

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Table of Contents

Abbreviations	vi
1 Introduction	1
1.1 Project background	1
1.2 Description of the Proposed Development	3
1.3 Purpose of this Report	4
1.4 Need for the Proposed Development	7
1.5 Study Area	7
1.6 Structure of the Report	8
2 Legislation and Policy Context	10
2.1 Introduction	10
2.2 Key Consents & Relevant Legislative Framework	10
2.3 Other Applicable Legislation	11
2.4 Marine Planning Policy	17
2.5 Other Relevant Plans and Policies	18
3 Description of Proposed Development	21
3.1 Introduction	21
3.2 Description of the Construction Phase	21
3.3 Description of the Operational Phase	25
3.4 Alternatives	30
4 Stakeholder Consultation	33
4.1 Introduction	33
4.2 Marine and Coastal Ecology Survey Specification	33
4.3 Sediment Sample Plan	33
4.4 Section 73 consultation responses	33
5 Scoping of Environmental Effects	35
5.1 Hydrodynamics, Sedimentation and Wave Climate	35
5.2 Traffic and Transportation	37
5.3 Air Quality	40
5.4 Landscape, Seascape and Visual Effects	42
5.5 Ecology and Nature Conservation	46
5.6 Commercial and Recreational Fisheries	57
5.7 Ground and Geo-environmental Conditions	60

5.8	Water Quality, Surface Waters and Flood Risk	64
5.9	Noise and Vibration	66
5.10	Commercial and Recreational Navigation	67
5.11	Archaeology and Heritage	69
5.12	Socio-economic effects	72
5.13	Climate Change	75
5.14	Population and Human Health	77
5.15	Accidents and Disasters	80
6	Cumulative Effects	83
6.1	Introduction	83
6.2	Initial list of potential plans and projects	83
7	Habitats Regulations Assessment	85
7.1	Introduction	85
7.2	Previous work undertaken and new information on the baseline environment	85
7.3	Identification of key issues	85
7.4	Approach to providing required information	86
8	Water Framework Directive Compliance Assessment	87
8.1	Introduction	87
8.2	Previous work undertaken and new information on the baseline environment	87
8.3	Identification of key issues	87
8.4	Approach to providing required information	88
9	Approach to Providing Required Information to Support Marine Licence, HRO and Detailed Planning Applications	89
10	Proposed Approach to the EIA	91
10.1	EIA methodology	91
10.2	Consideration of Alternatives	93
10.3	Consultation Process	94
10.4	Preparation of the Environmental Statement	94
11	References	95

Appendix A

2014 Outline Planning Permission

Appendix B1

The Illustrative Masterplan for the Proposed Development for which Outline Planning Permission (with All Matters Reserved) was granted in 2014

Appendix B2

Development Zoning of the 2014 Masterplan

Appendix C

Isle of Anglesey County Council's Decision on the Section 73 Application

Appendix D1

NRW's Response on Marine Survey Specification

Appendix D2

Cefas' Sediment Sampling Plan

Appendix D3

IoACC Response to S73 Application

Appendix D4

NRW Response to S73 Application

Appendix E

Sediment Chemical Analysis Results

Table of Tables

Table 2.1 Shoreline Management Policies for Holyhead and Penrhos, and Newlands and Afon Alaw	18
Table 2.2 A summary of the seven well-being goals as defined by the Well-being of Future Generations (Wales) Act 2005	19
Table 4.1 IoACC comments on the S73 application	34
Table 4.2 Comments from NRW on the S73 application	34
Table 5.1 2020 ES Study Area (Highway Junctions / Links)	38
Table 5.2 Viewpoint locations	42
Table 5.3 Statutory designated terrestrial sites considered in assessment	46
Table 5.4 Non-statutory designated sites considered in assessment	46
Table 5.5 Defined spawning and nursery grounds overlapping the study area (Ellis et al., 2010)	53
Table 5.6 Conservation / protection status of species that have the potential to occur in the study area	54

Table 5.7 Value of 2018 landings ('000 £) at key Welsh fisheries ports by UK and foreign vessels (MMO, 2019)	57
Table 5.8 Value of 2014 – 2018 landings ('000 £), of key shellfish species from ICES rectangle 35E5 by UK vessels (MMO, 2019)	58
Table 5.9 Original and revised uses	73
Table 5.10 Initial List of Accidents and Disasters and Determination of Further Consideration	81
Table 5.11 Refined List of Accidents and Disasters	82
Table 9.1 Summary of the proposed approach to the assessment	89
Table 10.1 Example Significance of Effect Matrix	92
Table E.1 Heavy metal and organo-tins concentrations compared to Cefas Action Levels (mg/kg)	1
Table E.2 PAH concentrations compared to Cefas Action Levels (mg/kg)	2
Table E.3 PAH concentrations compared to Cefas Action Levels (mg/kg) (cont.)	3
Table E.4 PCB concentrations compared to Cefas Action Levels (mg/kg)	4
Table E.5 PCB concentrations compared to Cefas Action Levels (mg/kg) (cont.)	5

Table of Figures

Figure 1.1 Site Location Plan.	2
Figure 1.2 2020 Masterplan	5
Figure 1.3 Updated development zones for the Proposed Development.	6
Figure 2.1 Designated Sites	13
Figure 2.2 Waste hierarchy	15
Figure 2.3 WFD waterbodies	16
Figure 3.1 Typical cross section through a rubble mound breakwater	23
Figure 5.1 Viewpoint Locations	45
Figure 5.2 Proportion of vessel movements at Holyhead Port by type of vessel over the past 30 days (July-August 2020)	68

Abbreviations

AONB	Area of Outstanding Natural Beauty	LVIA	Landscape and Visual Impact Assessment
ATC	Automatic Traffic Count	LSE	Likely Significant Effect
cSAC	candidate Special Area of Conservation	LBC	Listed Building Consent
CD	Chart Datum	LAQM	Local Air Quality Management
CCW	Countryside Council for Wales	LWS	Local Wildlife Site
CROW	Countryside Rights of Way Act	MCAA	Marine and Coastal Access Act
CIA	Cumulative Impact Assessment	MCZ	Marine Conservation Zone
BEIS	Department for Business, Energy and Industrial Strategy	MPS	Marine Policy Statement
DMRB	Design Manual for Roads and Bridges	MHWS	Mean High Water Spring
DBA	Desk-based Assessment	NERC	Natural Environment and Rural Council
DBT	Dibutyltin	NRW	Natural Resources Wales
DO	Dissolved Oxygen	NSN	National Site Network
EAW	Environment Act (Wales)	PM	Particulate Matter
EclA	Ecological Impact Assessment	PIA	Personal Injury Accident
EIA	Environmental Impact Assessment	PPW	Planning Policy Wales
EQS	Environmental Quality Standards	PAH	Polyaromatic Hydrocarbon
ESR	Environmental Scoping Report	PCB	Polychlorinated Biphenyl
ES	Environmental Statement	pSPA	potential Special Protection Area
EU	European Union	rMCZ	recommended MCZ
EP1HS	Extended Phase 1 Habitat Survey	RBD	River Basin District
FSA	Food Standards Agency	RBMP	River Basin Management Plan
GHG	Greenhouse Gas	RCAHWW	Royal Commission on the Ancient and Historical Monuments of Wales
GVA	Gross Value Added	RNLI	Royal National Lifeboat Institute
GWDTE	Groundwater Dependent Terrestrial Ecosystem	s73	Section 73
GAT	Gwynedd Archaeological Trust	SMP	Shoreline Management Plan
HSI	Habitat Suitability	SSSI	Site of Special Scientific Interest
HRA	Habitats Regulations Assessment	SAC	Special Area of Conservation
HRO	Harbour Revision Order	SPA	Special Protection Area
HA	Harbours Act	TAN	Technical Advice Note
HER	Historic Environmental Record	TA	Traffic Assessment
ICES	International Committee for the Exploration of the Sea	TBT	Tributyltin
ICE	Inventory for Carbon and Energy	UKCP	UK Climate Projections
IoACC	Isle of Anglesey County Council	WFD	Water Framework Directive
IROPI	Imperative Reasons of Overriding Public Interest	WG	Welsh Government
JLDP	Joint Local Development Plan		

1 Introduction

1.1 Project background

The Holyhead Waterfront Regeneration Scheme (the Proposed Development), being proposed by Conygar Holyhead Ltd, is located on Holy Island (Ynys Gybi) within Holyhead New Harbour, adjacent to the Great Breakwater (see **Figure 1.1**). An Environmental Statement (ES) for the Proposed Development was submitted to the Isle of Anglesey County Council (IoACC) in 2010 (the 2010 ES) (Axis, 2010), in support of an Outline Planning Application (with All Matters Reserved). The Proposed Development was awarded Outline Planning Permission, subject to a number of planning conditions, by the IoACC in 2014 (ref. 19C1046A/EIA/ECON) (the 2014 permission) (see **Appendix A**) which, amongst other things, required the submission of Reserved Matters applications by a certain date; however, to-date, and for various reasons, Reserved Matters applications have never been submitted pursuant to the Outline Planning Permission and, whilst the Outline Planning Permission itself remains extant, the date by which they were required to be has now lapsed.

Consequently, a Section 73 (s73) application was submitted to the IoACC in March 2020 (ref. VAR/2020/20/EIA) in order, principally, to extend the period of time within which Reserved Matters applications can be submitted and also extend the time period for the development being implemented. The Illustrative Masterplan (the 2014 Masterplan) submitted with the s73 application was identical to that approved by the 2014 permission (see **Appendix B1**). An ES (the '2020 ES') (Axis, 2020) was submitted in support of the s73 application that updated the 2010 ES to take account of new baseline information and changes to legislation since the 2010 ES was produced.

In May 2020 the IoACC determined that due to changes to the Proposed Development (see **Section 1.2.2**), they would not be able to accept applications for Reserved Matters pursuant to the Outline Planning Permission and recommended instead that a Detailed Planning Application for the Proposed Development needs to be sought (see **Appendix C**). At the time of writing, determination of the s73 application was ongoing, with the Outline Planning Permission anticipated to be issued Quarter 4, 2020.

As such the following consents will be required to permit the construction and operation of the Proposed Development:

- Detailed Planning Permission from the IoACC for all works above Mean Low Water (MLW);
- a Marine Licence from Natural Resources Wales (NRW) for all works below Mean High Water Spring (MHWS); and,
- a Harbour Revision Order (HRO) from the Welsh Government (WG).

All three applications would be supported by one, all-encompassing ES (Environmental Impact Assessment (EIA) Report), under the relevant EIA Regulations.

This Environmental Scoping Report (ESR) has therefore been submitted to the WG, NRW and the IoACC with requests for formal scoping opinions under the Marine Works (EIA) Regulations 2007 (as amended), the Harbour Works (EIA) Regulations 1999 and the Town and Country Planning (EIA) (Wales) Regulations 2017 (as amended), respectively.



Figure 1.1 Site Location Plan.

1.2 Description of the Proposed Development

The Proposed Development is for a mixed-use regeneration scheme which would include a new marina, the reclamation of land from the sea, new residential developments, together with commercial, leisure and retail uses and associated infrastructure. The development would lie along the Holyhead seafront, in the shelter of the Great Breakwater with a new marina, surrounded by a new breakwater, extending into Holyhead Harbour.

1.2.1 Original proposals approved by the 2014 permission

The original proposals, as approved by the 2014 permission (an identical version of which was presented in the s73 application), included (see **Appendix B1**):

- A 500-berth marina;
- 326 new dwellings (a mix of 1- and 2-bed apartments, and 2, 3, 4, and 5 bed houses);
- circa 280 visitor parking spaces;
- circa 380 private parking spaces;
- 4,040m² of commercial/leisure uses;
- 80 bed leisure/business hotel;
- A 300m² Sail Training/Youth Centre;
- Public Beach area with community changing/welfare facilities;
- A new 900m² maritime museum with a new 1,050m² visitor centre (within the existing Soldier's Point House);
- New maritime workshops; and,
- circa 250 space overflow car park.

For clarity, and in order to provide a comprehensive explanation of the scale of development proposed, it was necessary to divide the proposals into three distinct 'development zones'. Moving east to west, these zones were as follows (see **Appendix B2**):

- Zone 1 – The Marina and Promenade;
- Zone 2 – Porth-y-Felin; and,
- Zone 3 – Soldier's Point and the Great Breakwater.

1.2.2 Changes to the approved proposals

Further work on the design of the Proposed Development has resulted in some configurative changes to the Illustrative Masterplan, specifically:

- A reduction in the size of the proposed marina from 500 to 250 berths;
- A reduction in the size of the reclamation area along Newry Beach, being shorter to the east by approximately 50m;
- Development is no longer being proposed along Soldier's Point and the Great Breakwater;

- Design of the breakwater is now 100 years using a 200-year design standard;
- Development is no longer providing a hotel, new museum or 50% affordable housing; and,
- Dredging within the footprint of the proposed breakwater, reclamation areas and the RNLI afloat berth may be required.

The revised masterplan (the '2020 Masterplan') can be seen in **Figure 1.2**.

The development zones have also been updated as follows:

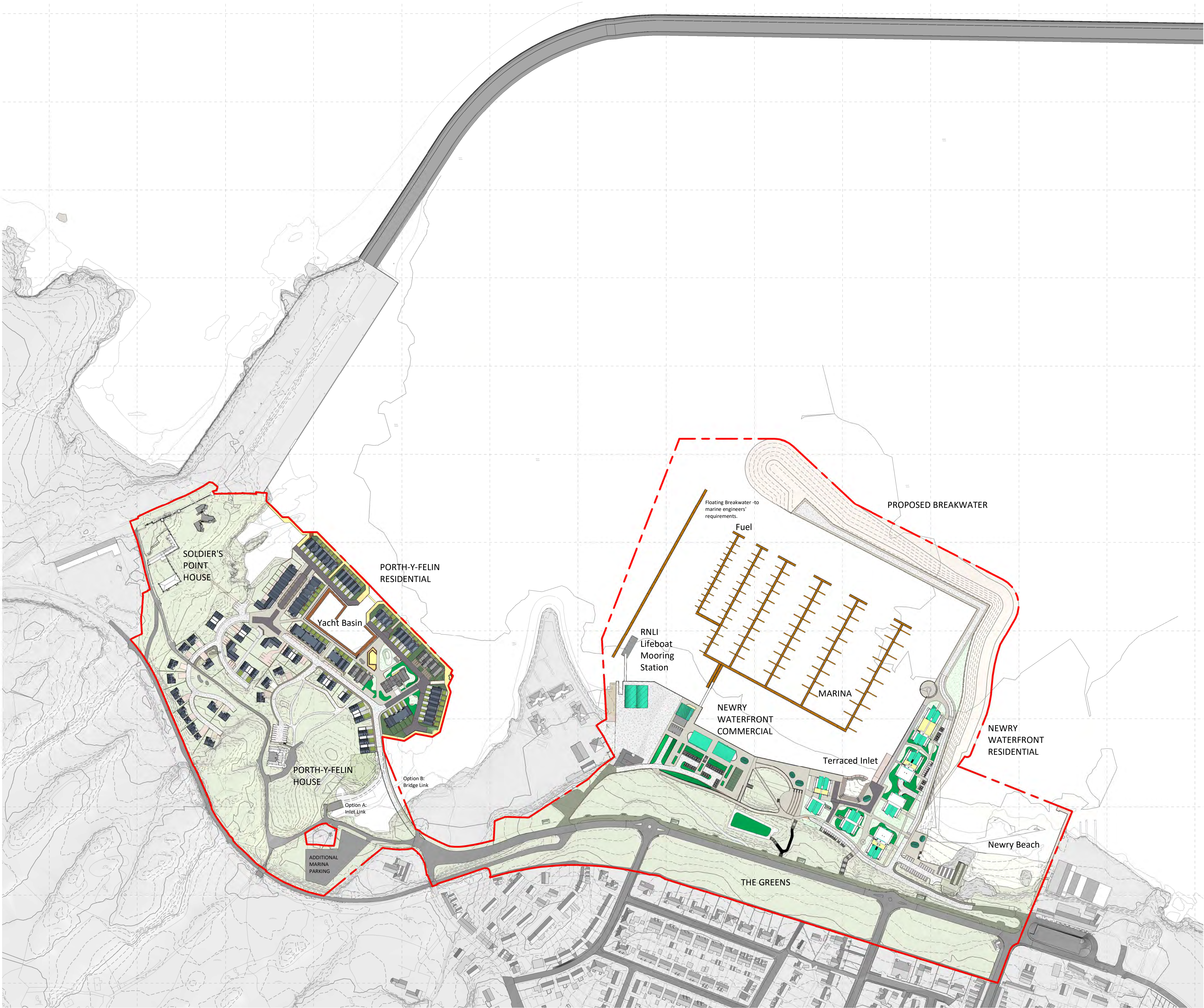
- Zone 1 – Newry;
- Zone 2 – Porth-y-Felin;
- Zone 3 – Soldier's Point; and,
- Zone 4 – The Greens.

The updated development zones can be seen in **Figure 1.3**.

1.3 Purpose of this Report

This ESR has been produced to scope the extent of supplementary/update work required to support the Marine Licence, HRO and Detailed Planning applications. The ESR has the following specific objectives:

- to identify new information for the study area (i.e. physical, biological, human and built environment) and Proposed Development to that presented in the 2020 ES;
- to identify additional and/or any changes in legislation to that presented in the 2020 ES and to assess the implications of these changes for the consenting process;
- in light of the above, to identify where data gaps exist and what further data collection and assessment may be necessary;
- to define the impact assessment approach, particularly relating to issues of potential significance that may not have been addressed in the 2020 ES as a consequence of the above points; and,
- to identify other projects and plans that may need to be considered in combination with the proposed works (i.e. cumulative effects).

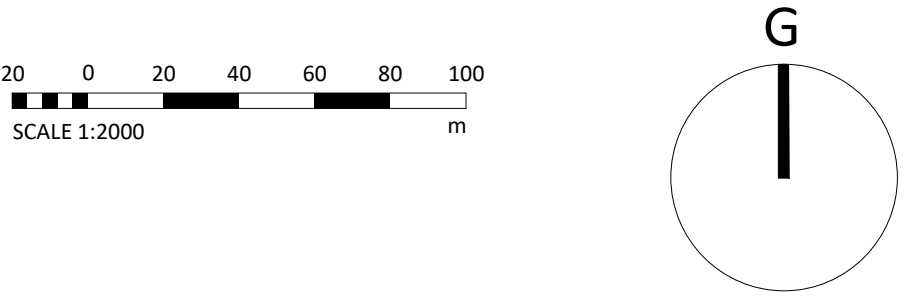


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E	Development details updated. Annotations updated.	24.09.2020	SJF
D	Annotations added.	15.09.2020	TL
C	RNLI Berth	10.09.2020	TL
B	Development boundary redefined.	04.09.2020	SJF
A	Zone 4 updated.	30.07.2020	SJF

REV	DESCRIPTION	DATE	INS
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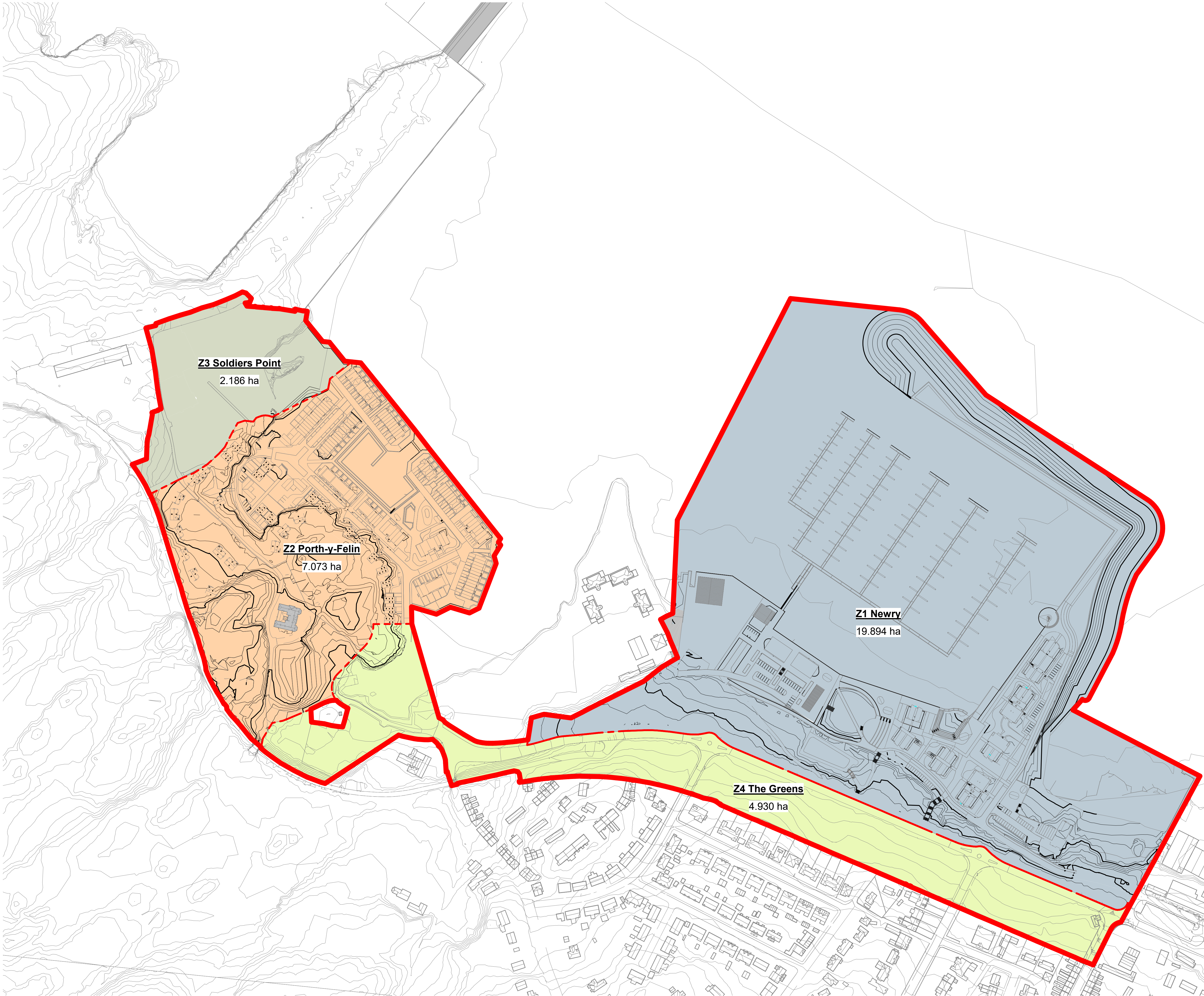
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PROJECT	Cynllun Adfywio Glannau Caergybi Caergybi, Ynys Môn, Cymru Holyhead Waterfront Regeneration Scheme Holyhead, Isle of Anglesey, Wales	AUTHOR	SJF
DATE	11/2019	CHECKED	
SCALE	1 : 2000 @ A1	REVISION	
DETAIL	Prif Gynllun Arfaethedig Proposed Masterplan		

STATUS	DRAWING NUMBER	REVISION
Concept	Figure 1.2	E

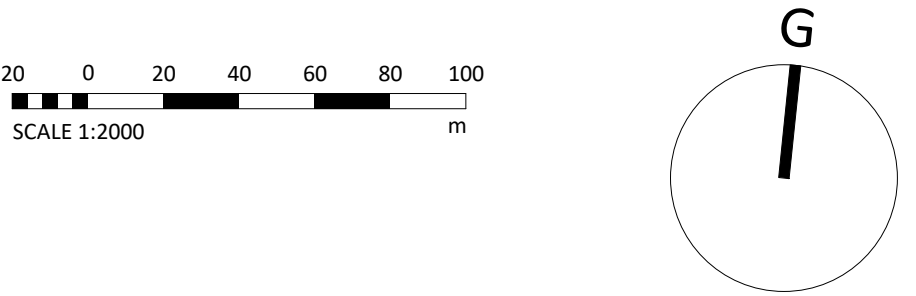


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Proposed Development Zones			
Zone	Name	Area	
		ha	acres
Z1	Newry	19.894	49.158
Z2	Porth-y-Felin	7.073	17.478
Z3	Soldiers Point	2.186	5.403
Z4	The Greens	4.930	12.182

D	Zone 1 amended as per sub-zone Z1-4.	09.09.2020	SJF
C	Zones redefined as per RHDHV requirements.	04.09.2020	SJF
B	Zone 4 updated.	30.07.2020	SJF
A	Zones updated.	26.03.2020	SJF

REV	DESCRIPTION	DATE	INS
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Holyhead Waterfront Regeneration Scheme
Holyhead, Isle of Anglesey, Wales
CLIENT
Conygar Holyhead Ltd
DETAIL
Parthau Datblygu Arfaethedig
Proposed Development Zones

AUTHOR
SJF
DATE
11/2019
SCALE
1 : 1750 @ A1
CHECKED
TM

STATUS	DRAWING NUMBER	REVISION
Concept	Figure 1.3	D

1.4 Need for the Proposed Development

The Proposed Development provides an excellent opportunity to improve and enhance Holyhead's status as a national and international tourism destination. It would enhance the appeal of Holyhead as a popular tourist attraction and provide improvements to an existing, well-known, destination. It would contribute to the continued regeneration of Holyhead Town, providing significant employment opportunities, residential and leisure facilities, acting as a catalyst to further investment and initiatives in the local area.

The Proposed Development offers the following attributes that would contribute to the development of a sustainable community that complements and enhances the existing town of Holyhead and retains the natural beauty of the coastal environment to the north-west. In response to its immediate and wider built and natural environment, the 2020 masterplan has been designed cognisant of the area's strengths such that the overall development will offer the following:

- Full linkage and interaction between the town centre and $\frac{3}{4}$ mile of coastal environment, with broader linkages to the Country Park;
- Preservation of existing panoramic views;
- Preservation and enhancement of multiple listed structures within the Holyhead Conservation Area;
- Preservation of existing coastal environment;
- Introduction of new and commercially sustainable mixed-uses;
- Creation of a variety of independent character areas that complement each other and work as well together as they do in isolation;
- Regeneration of commercial opportunities through the introduction of modern and attractive marina and visitor, tourist and training facilities;
- Public realm enhanced through beach, garden, promenade and coastal linkages/improvements; and,
- Creation of new homes for both the local population and boat owners.

1.5 Study Area

The study area for the environmental assessment in respect of the Proposed Development is the area over which the direct and indirect effects of the Proposed Development may be detected during the construction and operational phases.

In this case, the maximum extent of potential impact on the marine environment was determined by potential effects on tidal currents and sediment transport. Such effects have the potential to affect other parameters, such as marine ecology, waterbird populations and water quality. For the purposes of this scoping exercise, this has been set at 2km, which takes account of the findings of the 2020 ES whilst also making an allowance for the changes to the Proposed Development, in particular, the potential requirement to dredge. This will be confirmed by the proposed modelling studies (see **Section 5.1.4**).

With regard to potential for impacts on the terrestrial environment, the maximum study area for the Proposed Development has been set at 2km to take account of potential impacts to the landscape character and visual setting.

1.6 Structure of the Report

This ESR comprises the following sections:

- Following this introductory section (**Section 1**), **Section 2** examines the relevant current legislation and policy context;
- **Section 3** describes the key features of the Proposed Development including the construction phase and operational phases, and the alternative options considered;
- **Section 4** describes the consultation that has been undertaken to date;
- **Section 5** identifies the extent to which the 2020 ES remains valid and scopes any supplementary or updated studies that may be required to support the required applications. For each environmental receptor the following are considered:
 - o A description of the work undertaken for the 2020 ES and any new information on the baseline environment to that assessed previously;
 - o Identification of key issues:
 - As assessed within the 2020 ES;
 - Resulting from changes in the design of the Proposed Development; and,
 - Specific to the requirements of the forthcoming applications.
 - o The approach to providing sufficient information to inform the application decisions.
- **Section 6** describes the potential for cumulative impacts of the Proposed Development with other proposed projects in the area;
- **Section 7** identifies the extent to which the Habitats Regulations Assessment (HRA) in the 2020 ES remains valid and scope any supplementary or updated studies that may be required to support the required applications. The following are considered:
 - o A description of the work undertaken for the 2020 ES and any new information on the baseline environment to that assessed previously;
 - o Identification of key issues:
 - Identified in the HRA Screening for LSE Report; and,
 - Identified to those considered by the HRA Screening for LSE Report.
 - o The approach to providing sufficient information to inform the application decisions.
- **Section 8** identifies the extent to which the Water Framework Directive (WFD) Compliance Assessment in the 2020 ES remains valid and scope any supplementary or updated studies that may be required to support the required applications. The following are considered:
 - o A description of the work undertaken for the 2020 ES and any new information on the baseline environment to that assessed previously;
 - o Identification of key issues:
 - As assessed within the 2020 ES;
 - Resulting from changes in the design of the Proposed Development; and,
 - o The approach to providing sufficient information to inform the application decisions.

- **Section 9** sets out the proposed approach to providing the required information in support of the applications, including surveys and or investigations that are deemed necessary;
- **Section 10** sets out the proposed approach to the EIA methodology; considerations of alternatives; consultation process; and, the preparation of the ES; and,
- **Section 11** presents the references used in this report.

2 Legislation and Policy Context

2.1 Introduction

In order to implement the Proposed Development, a number of consents and licences under different legislative acts will be required. The key legislation and policies relevant to the Proposed Development are summarised in the following sections.

2.2 Key Consents & Relevant Legislative Framework

The key consents required for the Proposed Development are:

- Detailed Planning Permission under the Town and Country Planning Act 1990 (as amended) and the Town and Country Planning (Development Management Procedure (Wales) Order 2012 (as amended);
- A HRO in accordance with Section 14 of the Harbours Act 1964, as amended (HA 1964)¹; and,
- A Marine Licence under Part 4 of the Marine and Coastal Access Act (MCAA) 2009 (including deposits and removals) within the UK marine area².

2.2.1 The Town and Country Planning Act 1990 (as amended)

The Town and Country Planning Act 1990 (the 1990 Act) came into force on the 24th May 1990. The planning application, which this ES supports, is made under section 62 of the 1990 Act ("Applications for Planning Permission").

2.2.1.1 The Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (As Amended)

The Town and Country Planning (Development Management Procedure) (Wales) Order 2012 ("the 2012 Order") came into force on 30th April 2012. The 2012 Order, including its subsequent amendments, introduced a myriad of legislative changes and consolidated previous Orders and Statutory Instruments.

2.2.2 Harbours Act 1964 (as amended)

Following the transfer of specific functions under the HA 1964³, Welsh Ministers are responsible for making various types of harbour orders, including HROs under Section 14, for ports wholly within Wales.

Section 14 of the HA 1964 allows for the WG to make a HRO *"in relation to a harbour which is being improved, maintained or managed by a harbour authority in the exercise and performance of statutory powers and duties... for achieving all or any of the objects specified in Schedule 2"*.

Section 14 also requires an application to be made in writing to the WG by *"the authority engaged in improving, maintaining or managing it or by a person appearing to him to have a substantial interest or body representative of persons appearing to him to have such an interest"*. Conygar Holyhead Ltd, as having a substantial interest in improving, maintaining or managing of Holyhead Harbour, plan to make, with the support of Stena Line Ports Ltd as the Statutory Harbour Authority, a notification of their intent to submit an application for an HRO under Section 14 of the Harbours Act 1964 to allow for the construction of the Proposed Development.

¹ Supplemented by the Harbours Act 1964 (Delegation of Functions) Order 2010

² <http://www.legislation.gov.uk/ukpga/2009/23/section/42>

³ By Section 29 of the Wales Act 2017

2.2.3 Marine and Coastal Access Act 2009 (as amended)

Part 4 of the MCAA provides a framework for the marine licensing system for those 'licensable marine activities' undertaken within the UK marine area. NRW is the regulatory authority for marine licensing in Welsh inshore waters.

2.2.4 Requirement for EIA

Given the Proposed Development requires an HRO, a marine licence and detailed planning permission, the EIA Directive 2011/92/EU as amended by 2014/52/EU (the EIA Directive), is implemented *inter alia* by the Harbour Works (EIA) Regulations 1999, the Marine Works (EIA) Regulations 2007 (as amended) and the Town and Country Planning (EIA) (Wales) Regulations 2017 (as amended) respectively.

Given the nature and scale of the Proposed Development, an EIA is considered to be required under the following Schedule 2 categories of the EIA Directive:

- 1(g) - Reclamation of land from the sea;
- 10(b) - Urban development projects, including the construction of shopping centres and car parks; and,
- 12(b) - Marinas.

2.3 Other Applicable Legislation

2.3.1 The Conservative of Habitats and Species Regulations 2017

The Conservation of Habitats and Species Regulations 2017, as amended⁴, (the 'Habitats Regulations') transpose Directive 92/43/EEC on the conservation of natural habitats and of wild flora and fauna (the 'Habitats Directive') and Directive 2009/147/EC on the conservation of wild birds (the 'Wild Birds Directive') in the United Kingdom (UK).

The HRA process is required where new plans or projects have the potential to affect the designated interest features of 'European Sites'. European sites are defined in Regulation 8 of the Habitats Regulations and include Special Protection Areas (SPA), as designated under the Wild Birds Directive, or a Special Area of Conservation (SAC), as designated under the Habitats Directive. An HRA is also required as a matter of government policy for potential SPAs (pSPAs), candidate SACs (cSACs) and listed Ramsar sites for the purpose of considering development proposals affecting them (Welsh Government, 2009).

Should the works, either alone or in combination with other plans or projects, be deemed to have a Likely Significant Effect (LSE) on any European site (or it cannot be determined that there would not be a significant effect), then, in accordance with Section 63 of the Habitats Regulations, an 'Appropriate Assessment' is required for any plan or project, not connected with the management of the European site.

The footprint of the Proposed Development is within the following European designated sites (see **Figure 2.1**):

- Anglesey Terns/Morwenoliaid Ynys Môn SPA; and,

⁴ These have now been amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. The amendment creates a 'National Site Network' (NSN) to retain the concept of a UK network of sites and management objectives are established for the NSN. The role of the European Commission in determining whether Imperative Reasons of Overriding Public Interest (IROPI) apply in relation to plans and projects now falls to the Welsh Minister in Wales.

- North Anglesey Marine/Gogledd Môn Forol SAC.

The Proposed Development is approximately 125m from the following European designation sites (see **Figure 2.1**):

- Holy Island Coast/Glannau Ynys Gybi SPA; and,
- Holy Island Coast/Glannau Ynys Gybi SAC.

An HRA will therefore be required to assess the potential impacts of the Proposed Development, both along and in-combination, on the European sites listed above.

2.3.2 Planning (Listed Buildings and Conservation Areas) (Wales) Act 2012

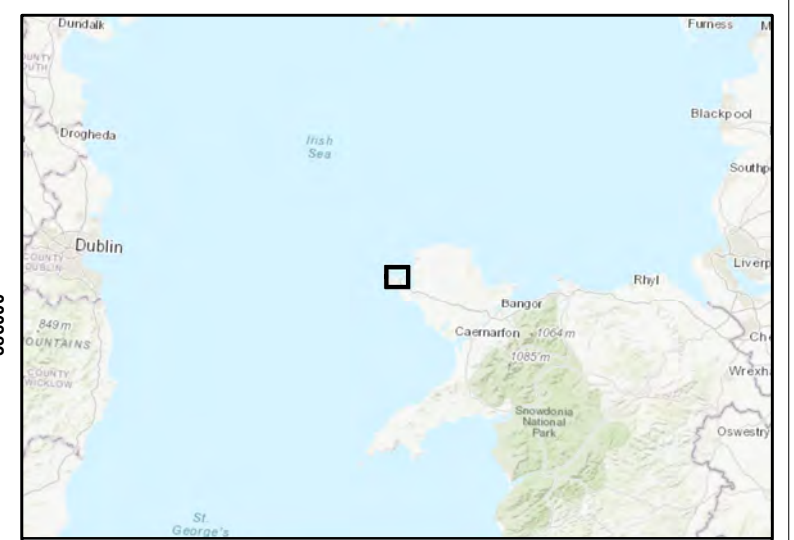
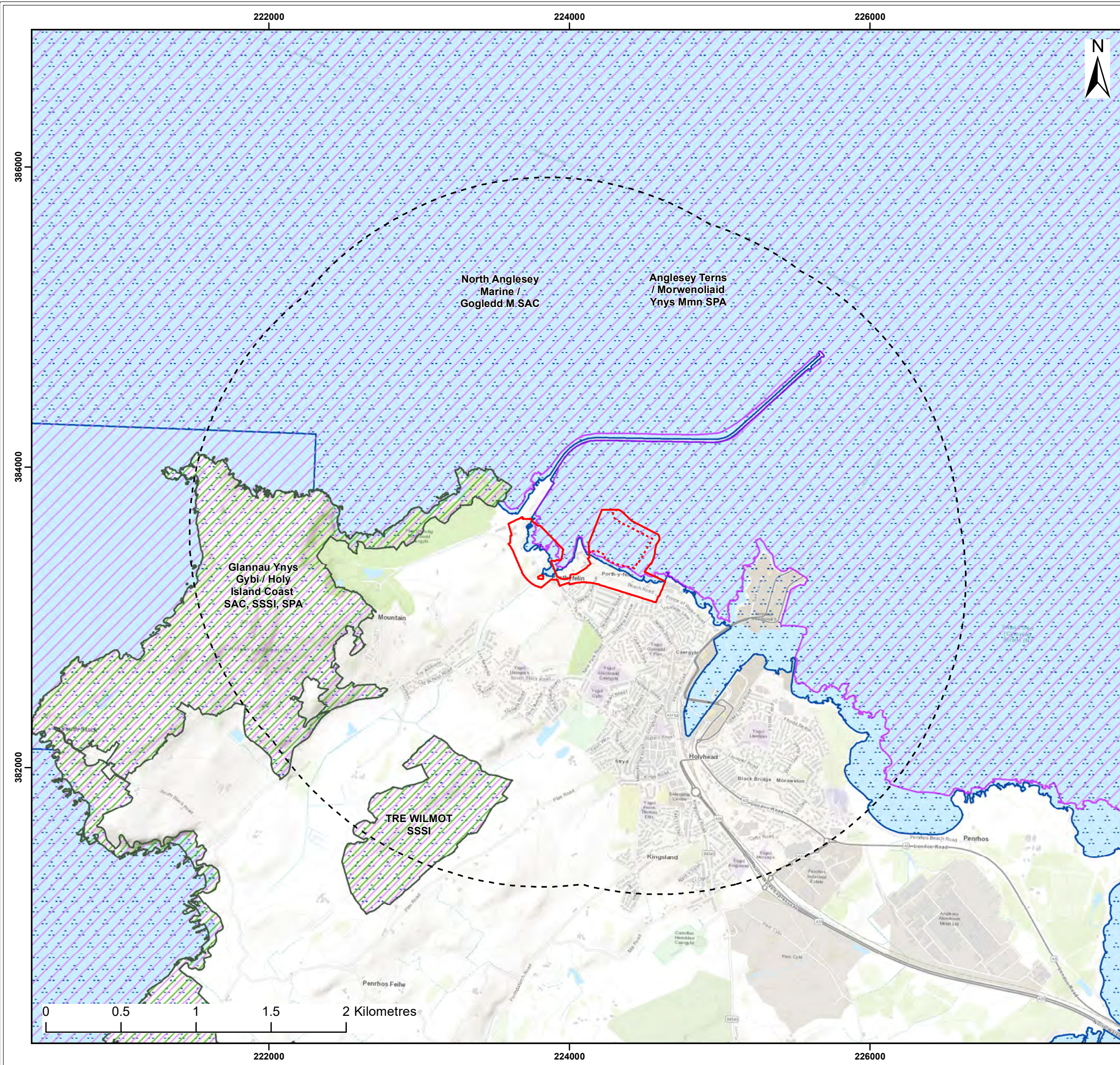
Listed Building Consent (LBC) under the Planning (Listed Buildings and Conservation Areas) (Wales) Act 2012 is required for all works of demolition, alteration or extension to a listed building that affects its character as a building of special architectural or historic interest. The requirement applies to all works and to all parts of those buildings covered by the listing protected (possibly including attached and curtilage buildings or other structures), provided the works affect the character of the building. The following listed buildings are present within the Proposed Development site, of which, unless stated otherwise, are Grade II listed:

- Soldier's Point House, Soldier's Point (LB No.14760);
- Screen Wall to Soldier's Point House, Soldier's Point (LB No.14761);
- Porth-y-Felin House, Soldier's Point (LB No.14759);
- Trinity Yard Small Workshop, Beach Road (N Side) (LB No. 14732);
- Trinity Yard Large Workshop, Beach Road (N Side) (LB No. 14731);
- Trinity House Office, Beach Road (N Side) (LB No. 1 4730);
- The Lifeboat House (formerly the Zodiac Restaurant, and now the Holyhead Maritime Museum), Beach Road (N Side) (LB No. 1 4729); and,
- Holyhead Breakwater (also known as the Great Breakwater), Soldier's Point, (Grade II* LB No. 5743).

2.3.3 Wildlife and Countryside Act 1981 (as amended)

Under the terms of Section 28(4)b of the Wildlife and Countryside Act 1981, as amended by Schedule 9 to the Countryside and Rights of Way Act (CROW) 2000, any operations within, or adjacent to, a Site of Special Scientific Interest (SSSI) require assent from NRW. Assent under Section 28 of the Wildlife and Countryside Act 1981 (as amended by the CROW 2000) is normally included in NRW's overall advice regarding the requirement (or otherwise) for an AA under the Habitats Regulations, where SSSIs are covered by European sites.

The Proposed Development is located approximately 125m from Glannau Ynys Gybi/Holy Island Coast SSSI and 1.2km from Tre Wilmot SSSI (see **Figure 2.1**).



Legend:

- Holyhead Waterfront Red Line Boundary
- 2km Buffer
- Sites of Special Scientific Interest (SSSI)
- Special Areas of Conservation (SAC)
- Special Protection Areas (SPA)

Environmental Designations: Contains Natural Resources Wales information © Natural Resources Wales and Database Right.

Base map: Sources: Esri, HERE, DeLorme, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, MapmyIndia, © OpenStreetMap contributors, and the GIS User

Client:	Project:
Conygar Holyhead Ltd	Holyhead Waterfront Regeneration Scheme

Title:
Statutory Nature Conservation Designations

Figure: 2.1		Drawing No: PB8908_RHD_ZZ_XX_DR_Z_0028			
Revision:	Date:	Drawn:	Checked:	Size:	Scale:
04	10/09/20	AB	SM	A3	1:25,000
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Co-ordinate system: British National Grid



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2.3.4 Marine Conservation Zones

The MCAA (2009) provided the legislation to create Marine Conservation Zones (MCZs), which protect nationally important marine wildlife, habitats, geology and geomorphology. The Proposed Development is not located within or adjacent to an MCZ or a recommended MCZ (rMCZ). As such an MCZ assessment is not required.

2.3.5 Water Framework Directive

The Water Framework Directive (WFD) (2000/60/EC) is transposed into national law by means of the Water Environment (WFD) (England and Wales) Regulations, 2017, which remain in force in England and Wales. These regulations provide for the implementation process of the WFD from designation of all surface waters (rivers, lakes, transitional (estuarine) and coastal waters and groundwater) as water bodies through to achieving good ecological status by 2027. NRW is the responsible authority for WFD compliance in Wales. The WFD applies to 1nm offshore. The WFD also requires that a management plan is produced for each River Basin District (RBD). The Proposed Development is within the Western Wales River Basin Management Plan (RBMP) area.

The WFD specifies the factors, referred to as quality elements, which must be used in determining the ecological status or ecological potential and the surface water chemical status of a surface water body. The Proposed Development is located within, and in close proximity to, the following WFD water bodies (see **Figure 2.2**):

- Holyhead Bay Coastal Water Body (GB681010360000);
- Caernarfon Bay North Coastal Water Body (GB621010380000); and,
- Ynys Môn Secondary Groundwater Water Body (GB41002G204400).

2.3.6 Shellfish Waters Directive

The Shellfish Waters Directive (2006/113/EC) has now been subsumed by the WFD. All previously designated shellfish waters have been placed on the Protected Areas register under the WFD. Following the repeal of the Directive at the end of 2013, there is an ongoing requirement to manage designated shellfish waters to ensure there is no deterioration in water quality and the levels of protection are not relaxed. Therefore, existing shellfish waters must at least maintain their current Food Standards Agency (FSA) classification and the environmental objective under the WFD for the wider water body in which they are located.

The water quality standards established under the 2006 Directive have been transposed into the WFD and remain unchanged. These parameters include suspended solids, salinity, dissolved oxygen (DO), organo-halogenated substances (e.g. PCBs, organochlorine pesticides), metals and guideline values for coliforms in shellfish flesh. There are no designated Shellfish Waters within 2km of the Proposed Development as such Shellfish Waters have been scoped out of the EIA.

2.3.7 Bathing Water Directive

The revised Bathing Water Directive was adopted in 2006 (2006/7/EC) and reporting against this Directive has commenced. The key features of the revised Directive include more stringent water quality standards and increased provision of public information. Compliance will be measured using the classes: poor, sufficient, good and excellent. The revised Directive requires all bathing waters to be classed as 'sufficient' and changes the receptors measured to assess water quality. There are no Bathing Waters within 2km of the Proposed Development and as such Bathing Waters have been scoped out of the EIA.

2.3.8 Priority Substances Directive

The Priority Substances Directive (2013/39/EU) is implemented in England and Wales by the Water Framework Directive (Standards and Classification) Directions (England and Wales) 2015. Compliance with these standards forms the basis of good surface water chemical status under the WFD.

The Environmental Quality Standards (EQSs) Directive (2008/105/EC) supersede EQSs initially introduced by the Dangerous Substances Directive (76/464/EEC); however, where EQSs are not listed for substances, limit values set by the Dangerous Substances Directive and its daughter Directives remain in force.

2.3.9 Waste Framework Directive

The Waste Framework Directive (2008/98/EC) consolidates earlier legislation regulating waste. The Directive sets out the general rules applying to all categories of waste. A key objective of which is to provide measures to protect the environment and human health by preventing or reducing the adverse impacts of the generation and management of waste and by reducing overall impacts of resource use and improving the efficiency of such use.

Article 3(1) of the Directive defines waste as:

“....any substance or object....which the holder discards or intends or is required to discard”.

More generally, the Directive provides a general duty to ensure that waste is dealt with in an environmentally friendly way. The key to this is the ‘waste hierarchy’, which emphasises prevention (in the first instance) and then re-use, recycling and recovery of waste (see **Figure 2.3**). EU Member States must have regard to the waste hierarchy when dealing with waste. Disposal to landfill or at sea is the least favourable option.

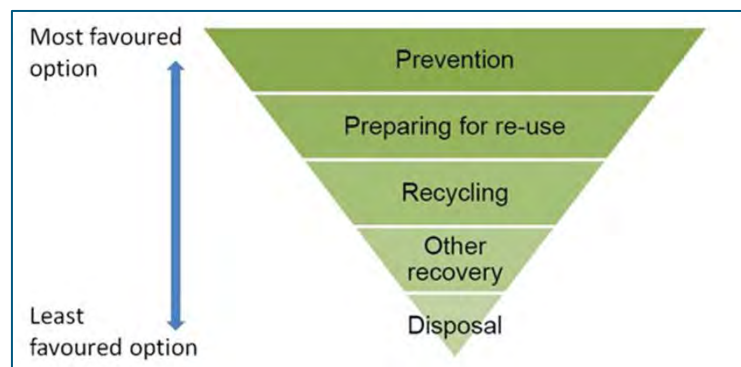
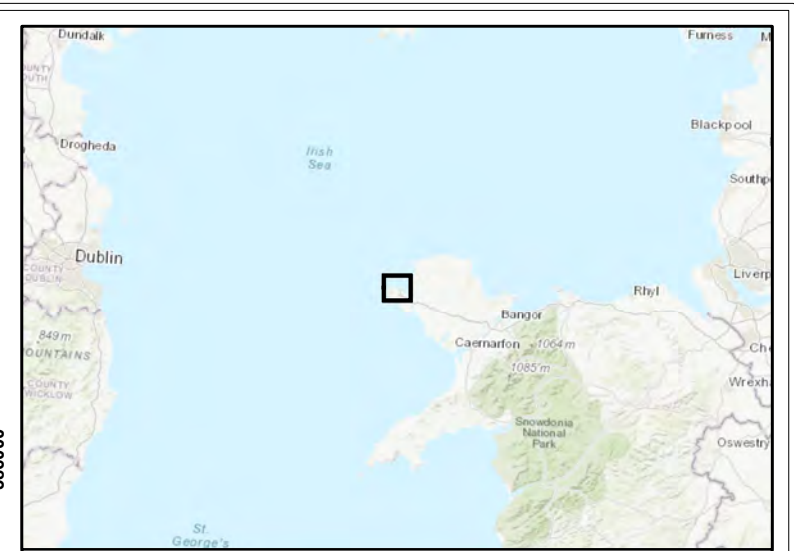
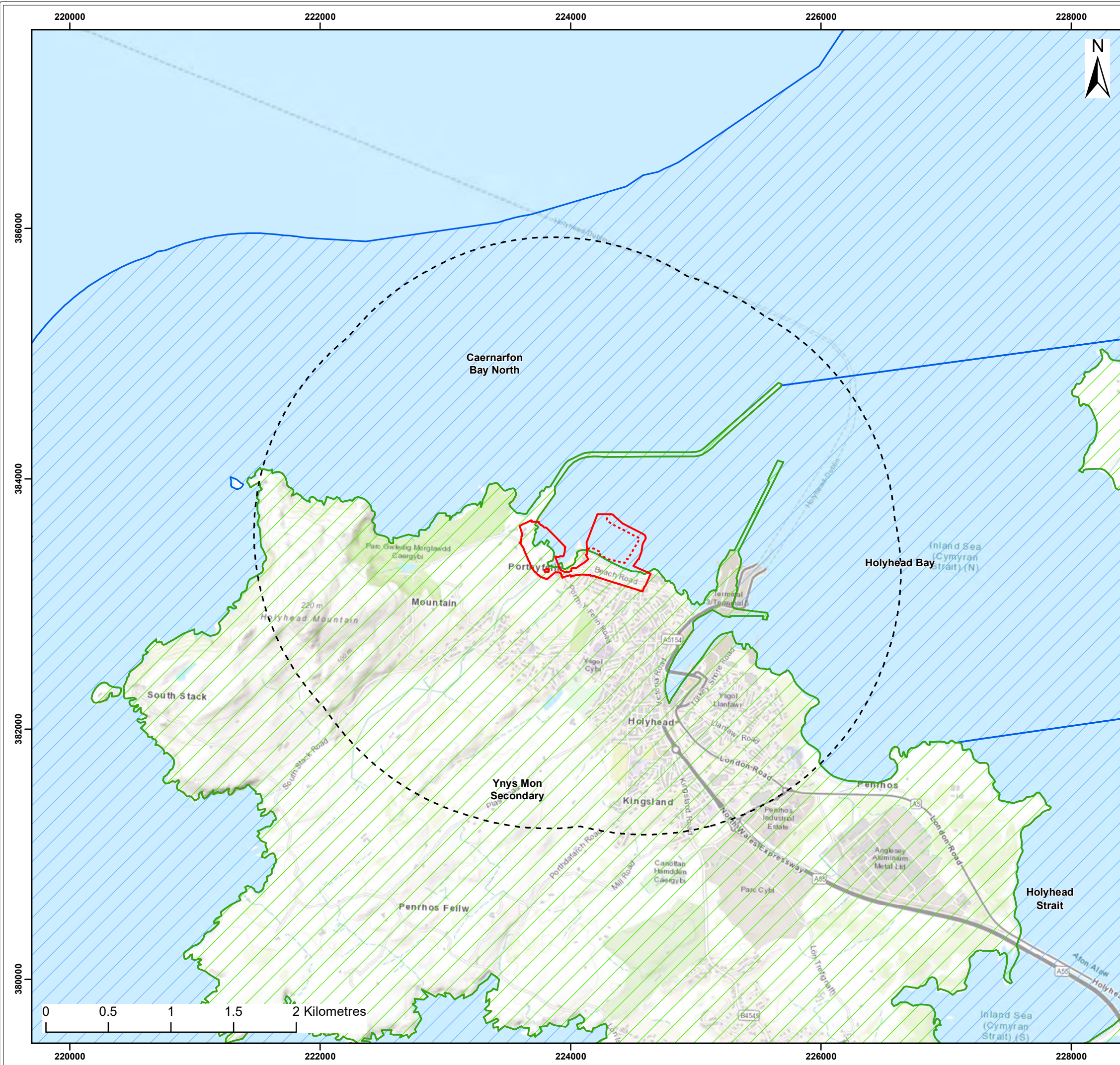


Figure 2.2 Waste hierarchy

The Proposed Development has potential to generate waste during the construction and operation phases, this would be dealt with through standard site waste management planning. No unusual wastes would arise in terms of types of waste or quantity.



Legend:

- Holyhead Waterfront Red Line Boundary
- 2km Buffer
- WFD Groundwater Body
- WFD Coastal Water Body

WFD Water Bodies: Contains Natural Resources Wales information © Natural Resources Wales and Database Right.

Base map: Sources: Esri, HERE, DeLorme, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, MapmyIndia, © OpenStreetMap contributors, and the GIS User

Client:	Project:
Conygar Holyhead Ltd	Holyhead Waterfront Regeneration Scheme

Title:
WFD Water Bodies

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2.4 Marine Planning Policy

2.4.1 UK Marine Policy Statement

The UK Marine Policy Statement (MPS) provides the framework for preparing marine plans and taking decisions affecting the marine environment. The MPS is intended to contribute to the achievement of sustainable development in the UK marine area.

The MPS enables an appropriate and consistent approach to marine planning across UK waters, and ensures the sustainable use of marine resources and strategic management of marine activities from renewable energy to nature conservation, fishing, recreation and tourism. The MPS stipulates that the extraction of marine dredged sand and gravel should continue to the extent that this remains consistent with the principles of sustainable development, recognising that marine aggregates are a finite resource and in line with the relevant guidance and legislation.

It is considered that the following policies are relevant to the Proposed Development:

Policy 3.4 – Ports and Shipping; and,

Policy 3.6 – Marine Dredging and Disposal.

2.4.2 Welsh National Marine Plan

The MCAA divides the UK marine area into planning regions with an associated plan authority responsible for preparing plans for their region. Once adopted, marine plans will have the same effect on authorisation or enforcement decisions in the UK marine area as the MPS, including the requirements and conditions attached to authorisations and the enforcement action that would be taken to ensure compliance. The Welsh National Marine Plan was published in November 2019 to cover Welsh inshore and offshore waters in accordance with the Marine and Coastal Access Act 2009 and the UK MPS (Welsh Government, 2019). The vision for the Welsh inshore and offshore marine plan region is that:

“Welsh seas are clean, healthy, safe, productive and biologically diverse:

- *Through an ecosystem approach, natural resources are sustainably managed and our seas are healthy and resilient, supporting a sustainable and thriving economy;*
- *Through access to, understanding of and enjoyment of the marine environment and maritime cultural heritage, health and well-being are improving;*
- *Through Blue Growth more jobs and wealth are being created and are helping coastal communities become more resilient, prosperous and equitable with a vibrant culture; and,*
- *Through the responsible deployment of low carbon technologies, the Welsh marine area is making a strong contribution to energy security and climate change emissions targets.”*

The following General Cross-cutting Policies are considered to be relevant to the Proposed Development:

- GEN – Planning Policy;
- ECON – Achieving a Sustainable Marine Economy;
- SOC – Ensuring a Strong, Healthy and Just Society;
- ENV – Living within Environmental Limits; and,

- GOV – Promoting Good Governance.

The following Sector Policies are also considered to apply to the Proposed Development:

- D&D – Dredging and Disposal; and,
- T&R – Tourism and Recreation

A Marine Plan Assessment will be produced to support the Marine Licence Application.

2.4.3 Shoreline Management Plans

Shoreline Management Plans (SMPs) aim to identify the best ways to manage flood and erosion risk to people and the developed, historic and natural environment, and to identify opportunities where shoreline managers can work with others to make improvements. They do not set policy for anything other than coastal defence management. The Proposed Development lies within the West Wales SMP2 (Royal Haskoning, 2012). The long-term management policies for the sections of coastline of relevance are presented in **Table 2.1**.

Table 2.1 Shoreline Management Policies for Holyhead and Penrhos, and Newlands and Afon Alaw

Policy Number	Policy Unit	Policy Plan		
		2025	2055	2105
17.15	Holyhead	HTL	HTL	HTL
17.16	Penrhos Bay	MR	MR	MR
17.17	Penrhos Headland	NAI	NAI	NAI
17.18	Stanley Embankment	HTL	HTL	HTL
17.21	Newlands	MR	MR	MR
17.22	Afon Alaw	MR	MR	MR
17.23	Traeth Gribin to Twyn Cliperau	MR	MR	MR

2.5 Other Relevant Plans and Policies

2.5.1 Planning Policy Wales

The Planning Policy Wales (PPW) was originally published by the WG in 2002 and sets the context for planning in Wales, under which Local Planning Authorities prepare their statutory Development Plans. It is the principal and Authoritative source of national planning policy.

PPW sets out the land use planning policies of the WG. The planning policy is supplemented by a series of Technical Advice Notes (TANs), WG Circulars, and policy clarification letters, which together with PPW provide the national planning policy framework for Wales.

Updates to the national planning policy are issued for consultation and then incorporated into the latest version of PPW (Edition 10, issued December 2018⁵).

⁵ <https://gov.wales/sites/default/files/publications/2019-02/planning-policy-wales-edition-10.pdf>

2.5.2 Environment Act (Wales) 2016

The Environment Act (Wales) (EAW) 2016 enables sustainable, proactive and joined-up planning and management of the natural resources of Wales. It replaces and enhances the current biodiversity duty under the Natural Environment and Rural Communities Act 2006 (NERC Act) which required that public authorities must have regard to conserving biodiversity. It requires all public authorities, when carrying out their functions in Wales, to seek to “maintain and enhance biodiversity” where it is within the proper exercise of their functions. In doing so, public authorities must also seek to “promote the resilience of ecosystems”. The EAW 2016 (Section 7) includes lists of priority species and habitats in Wales considered to be of key significance to sustain and improve biodiversity.

2.5.3 Wales Biodiversity Partnership (Pastneriaeth Bioamrywiaeth Cymru)

The Wales Biodiversity Partnership brings together organisations from the public, private and voluntary sectors to promote and monitor biodiversity and ecosystem action in Wales.

2.5.4 Well-being of Future Generations (Wales) Act 2015

The Well-being of Future Generations Act 2015 (‘The Future Generations Act’) is designed to improve the social, economic, environmental and cultural well-being of Wales. It requires public bodies in Wales (including IoACC and NRW) to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs (the ‘sustainable development principle’). The Act puts in place seven well-being goals that should be met; together the goals provide a shared vision for public bodies to work towards (see **Table 2.2**). Public bodies must work to achieve all of the goals.

Table 2.2 A summary of the seven well-being goals as defined by the Well-being of Future Generations (Wales) Act 2005

Well-being goal	Description of the goal
A Prosperous Wales	“An innovative, productive and low-carbon society which recognises the limits of the global environment and uses resources efficiently and proportionately, and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities”.
A Resilient Wales	“A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change”.
A More Equal Wales	“A society that enables people to fulfil their potential no matter what their background or circumstances”.
A Healthier Wales	“A society in which people’s physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood”.
A Wales of Cohesive Communities	“Attractive, viable, safe and well-connected communities”.
A Wales of Vibrant Culture & Welsh Language	“A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, sport and recreation”.
A Globally Responsible Wales	“A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being”.

In order that a public body can work in line with the sustainable development principle to meet the seven goals, it must set and publish well-being objectives that are designed to maximise its contribution to meeting the goals. The Future Generations Act sets out five ways of working that the body should consider when carrying out its duties:

- Long term – the importance of balancing short-term needs with the need to safeguard the ability to also meet long-term needs (especially where things done to meet short-term needs may have detrimental long-term effects);
- Integration – consideration of how the body's well-being objectives may impact upon each of the well-being goals, on their objectives, or on the objectives of other public bodies;
- Involvement – the importance of involving people with an interest in achieving the well-being goals, and ensuring that those people reflect the diversity of the area which the body serves;
- Collaboration – acting in collaboration with any other person (or different parts of the body itself) that could help the body to meet its well-being objectives; and,
- Prevention – consideration of how acting to prevent problems occurring or getting worse may help public bodies meet their objectives.

2.5.5 Anglesey and Gwynedd Joint Local Development Plan

The Anglesey and Gwynedd Joint Local Development Plan (JLDP) (IoACC and Gwynedd Council, 2017) covers the local authorities of the IoACC and Gwynedd Council. Following its adoption in July 2017, the JLDP replaced the Gwynedd Structure Plan and the Ynys Môn Local Plan and now forms the basis for land use planning in these areas. The plan covers the period 2011 to 2026.

2.5.6 Wales Spatial Plan – People, Places and Future

Holyhead is the centre of a Secondary Hub within the Wales Spatial Plan (Welsh Assembly Government, 2008) and the focus of much of the planned future investment in the area. Therefore, maintaining the port operations at Holyhead is seen as vital to sustaining this regional intent. Holyhead is recognised as a major international gateway with key transportation corridors including the A55 and the E22 Trans European Network route (which includes the port). Holyhead is a recognised key growth settlement with the focus on providing services and employment and building on established strengths to support and spread prosperity to the wider rural hinterland.

2.5.7 North Wales Growth Plan

The North Wales Growth Plan was developed in partnership between the six North Wales councils, business partners, colleges and universities and was submitted to the UK and Welsh Governments in 2017. The proposals will enable investment of £1.3 billion in the North Wales economy, providing jobs, new businesses and housing (North Wales Growth Board, 2017).

3 Description of Proposed Development

3.1 Introduction

The Holyhead Waterfront Regeneration Scheme is a mixed-use development proposed along the existing waterfront, in the shelter of the Great Breakwater.

Significant elements of the Proposed Development would be sited on reclaimed land within the existing harbour area. The Proposed Development would necessitate the importation (by sea) of the material necessary to create the development platforms. It is envisaged that this would be sourced from suitable quarry facilities with access to the sea.

Further work on the design of the Proposed Development has resulted in some configurative changes to the approved 2014 Illustrative Masterplan, see **Section 1.2.2**, which is depicted in the 2020 Masterplan and described below.

For clarity, and in order to provide a comprehensive explanation of the scale of Proposed Development, it has been necessary to divide the proposals into four distinct 'development zones':

- Zone 1 – Newry;
- Zone 2 – Porth-y-Felin;
- Zone 3 – Soldier's Point; and,
- Zone 4 – The Greens.

The first three zones are anchored by a primary development within and around which other complementary uses are proposed.

3.2 Description of the Construction Phase

3.2.1 Newry and Porth-y-Felin Developments

Details of the construction phase of the Newry and Porth-y-Felin developments are currently unconfirmed; however, it is likely to include the following elements:

- Site compound(s);
- Creation of development platforms upon newly reclaimed land;
- Construction of new residential and commercial buildings, internal roads and associated infrastructure;
- Installation of services and drainage; and,
- Modifications to existing amenity areas, roads and buildings.

These elements will likely involve the use of the following:

- General earthwork;
- Concrete batching plant;
- Excavations for foundations,

- Rock drilling and socket piling;
- Delivery of construction materials by road and sea;
- Use of cranes and barges for movement of material;
- Vibratory compaction; and,
- Topsoil stripping and cutting or terracing into the existing ground surface.

Standard mitigation measures could be implemented to manage any effects arising from the construction of the Proposed Development. These could include:

- Dust management and suppression protocols;
- Surface water run-off prevention;
- Dedicated storage areas for materials;
- Spill kits;
- Restriction of construction hours to non-sensitive times of the day; and,
- Noise monitoring.

As the project progresses, these aspects of the Proposed Development will be given more detailed consideration in order that they can be accurately described, with their potential environment effects fully assessed within the ES. Any required mitigation will be identified at that stage and, where relevant, further information regarding the construction of terrestrial elements will be provided pursuant to any planning conditions imposed on the approvals being sought.

3.2.2 Marina and Breakwater

3.2.2.1 Delivery and storage of construction materials

There are three options for the delivery and storage of materials for the proposed marina and breakwater:

1. Land delivery of materials to Holyhead Port for storage and then to the construction site;
2. Marine delivery of materials to Holyhead Port for storage which would then be transported to the construction site by road; and,
3. Marine delivery and storage of materials on large transshipment barges.

When a combined approach is used it is likely that all rock materials will be delivered to the construction site using floating or marine equipment to minimise the disruption to the general public and road users.

3.2.2.2 Materials required for the breakwater

Rubble mound breakwaters are structures built of quarried rock, usually protected by a cover layer of heavy armour stones or concrete armour units. The core of the breakwater may partly comprise other materials (e.g. gravel or other quarry-run materials). A typical cross section of a rubble mound breakwater is shown in **Figure 3.1**, which indicates the various components.

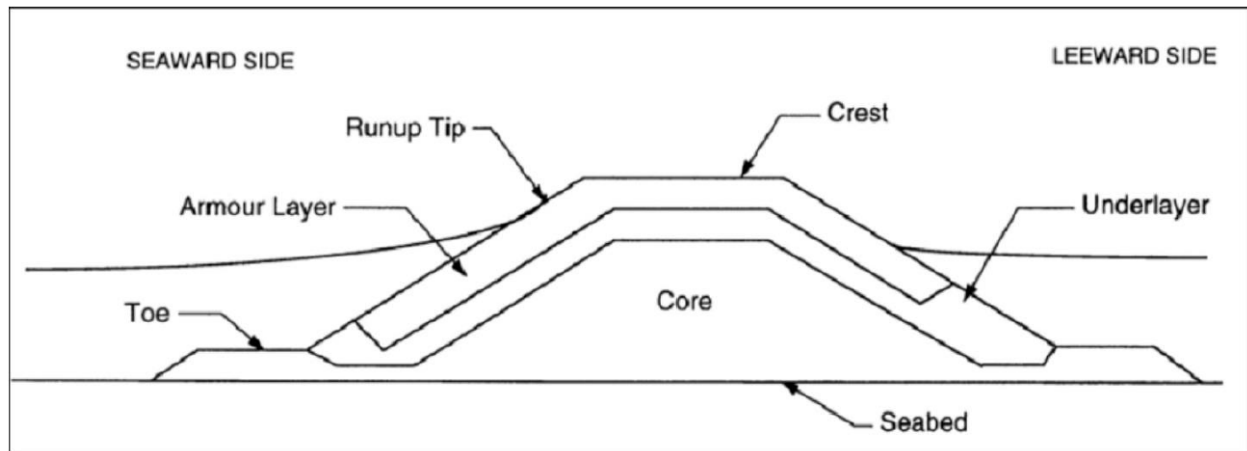


Figure 3.1 Typical cross section through a rubble mound breakwater

The seaward face is likely to require rock armour units weighing up to 1,500kg. The leeward side of the breakwater is likely to require a primary armour weighing approximately 450kg. The roundhead and the leeward side of the roundhead will require rock armour units weighing up to 1,500kg.

To provide protection from surge tides and extreme waves, the total volume of core material required would be in the order of 330,000m³ with approximately 75,000m³ of primary and secondary rock armour, based on an average depth below Chart Datum (CD) of approximately 7.0m and a crest level of about 8.5mCD.

3.2.2.3 Materials required for a vertical leeward breakwater

Should the design of the leeward side of the New Breakwater include a vertical quay wall, this would be constructed using concrete blocks with an approximate size of 4m long, 2m wide and 2m height, and would weigh around 12t. These blocks would be stacked on top of each other in a staggered pattern to create a solid vertical wall capable of resisting the forces from the rubble mound on the seaward side plus any vessels moored alongside on the leeward side.

3.2.2.4 Newry Waterfront Residential and Commercial Reclamation Area

Once the New Breakwater is completed, it is proposed to reclaim an area from the sea both at the landward end of the breakwater and along the waterfront itself to support residential and commercial properties along with new land-based marina accommodation. This reclaimed area would be formed by importing suitable sand material. Given the quantity (approximately 100,000m³), this sand would likely be dredged from an offshore licenced aggregate site and transported to the site by a hopper dredger, which will either rain-bow (spray) the material into the reclaimed area or alternatively it will be pumped along a floating pipeline.

3.2.2.5 Method of construction

There are also three options for the construction of the proposed marina and breakwater:

1. Land-based construction;
2. Marine-based construction; and,
3. A combination of land- and marine-based construction methods.

Land-based construction methodology

Should the New Breakwater be constructed using land-based equipment the following outline methodology is proposed:

1. Core material would be placed first, consisting of quarried stone (1 – 300kg). This material would be end tipped into the sea to form the base for the proposed breakwater. The core of the rubble mound would then be trimmed/shaped using long reach excavators operating from the land or from the top of the core mound create by end tipping the core material. This allows the structure to be topped out and, if necessary, a roadway along the breakwater can be incorporated or alternatively rock armour can be placed along the crest of the structure.
2. The underlayer material would then be placed by end tipping the material and a long reach excavator would then regrade/reshape the slope to the finished profile.
3. The armour layer would be individually placed using a crawler crane with an attached grab operating from the crest of the breakwater mound, working from the seaward end back towards the land.
4. At this stage, it is envisaged that the New Breakwater would have a single width roadway with occasional passing places along the crest of the structure to enable vehicular access for maintenance and emergency vehicles. This roadway may incorporate a small upstand wall (a crown wall) to minimise the amount of overtopping that might occur. This roadway and small upstand wall would be formed using in-situ concrete.
5. The reclaimed area would be constructed as outlined above.

Marine-based construction methodology

Should the New Breakwater be constructed using marine-based construction equipment the following outline methodology is proposed:

1. Core material would be placed first using side tipping vessels/barges which contain tipper bins that are capable of being lifted upwards to discharge the rock into the sea at the location it is required. Once placed, the material would be regraded/reshaped using a long reach excavator, which operates from either a floating barge/jack-up.
2. The underlayer material would then be transferred from a barge to the New Breakwater using a long reach excavator operating from the floating barge/jack-up.
3. Armour material would be individually placed by crane using a grab operating from a floating barge/jack-up.
4. The construction of the concrete roadway and any possible upstand wall would be constructed as outlined in the land-based construction.
5. The reclaimed area would be constructed as outlined above.

Combined construction methodology

The core of the rubble mound is likely to be formed from side tipping the material into the sea by using a marine vessel. At this point the construction can potentially consider using a combination of land based and marine based construction. Land based plant can either work its way along the crest of the mound from the landward end or alternatively land based equipment can be transferred from a floating barge onto the rubble mound to enable both a marine and land-based construction to occur at the same time. The benefits of this approach are that many phases of construction can operate at the same time, at all stages of the tide and therefore the construction programme can be reduced.

Requirement for dredging

Regardless of the construction methodology selected, the breakwater needs to be installed on a sound formation level. It is envisaged that the breakwater would be constructed directly on the seabed if ground conditions are favourable.

If the ground conditions are not favourable, it may be necessary to dredge the soft material from the seabed within the footprint of the breakwater. In addition, dredging may be required within the reclamation areas to remove any unsuitable material and also to provide sufficient depth for the RNLI afloat berth. Depending on the physical nature of the material to be dredged, it is anticipated that a Trailer Suction Hopper Dredger (TSHD) and/or Cutter Suction Dredger (CSD) may be used. It is anticipated that up to 125,000m³ of material may be required to be dredged and disposed of.

Disposal of the dredged material will be considered within the ES; however, it is proposed to be kept within the marine environment. Given the usage of the New Harbour area, it is not considered likely that could be kept within the harbour area. Should this be the case, it is proposed that the material would be disposed of at Holyhead North (IS043) disposal site.

Marina installation

At this stage it is expected that the proposed main walkways, finger berths and floating breakwater will be held in position by using vertical steel restraining piles. These would be bored into the rock beneath the seabed surface to create a socket into which the steel restraining piles would be secured. However, at this stage the number of piles is not yet known.

Given these restraining piles would be within the enclosed water space created by the outer breakwater, the piles would be installed using marine equipment in the form of a floating barge to bring the steel piles to the construction phase and another floating barge for the crane with a boring facility.

3.3 Description of the Operational Phase

3.3.1 The Proposed Development

3.3.1.1 Zone 1: Newry

This area of the development is located within the eastern section of the development boundary. The proposal seeks to integrate a new marina and complementary facilities alongside the existing marina and Holyhead Sailing Club. Development in this zone would comprise:

- 250 berth marina to accommodate vessels ranging from 6m to 16m in length and with an enclosed area of approximately 8.4ha, including:
 - o A new breakwater - covering 2.1ha of seabed and connected to the shoreline along Newry Beach, incorporating a reclaimed area from the sea that would support residential properties to be built at the root of the breakwater, to be called the Newry Waterfront Residential Area.
 - o Public promenade along length of the new breakwater featuring a dominant public art piece - possibly themed around Saint Cybi, a 6th-century Cornish bishop, saint and king who worked largely in North Wales and Anglesey.
 - o A new promenade wall – to define the new shoreline and to enclose the area of land reclamation.

- o A new floating breakwater – running approximately parallel to the Great Breakwater to the West of the marina basin, designed to prevent locally generated waves from reflecting into the marina from Great Breakwater and Soldiers Quay.
 - o Access walkway and security - Access to the main berthing facility would be via a new access walkway extending from the newly developed Newry Waterfront Commercial area. There would be a new bank seating and security gates for berth holders. Electrical distribution cabinets, water main stop taps, WIFI aerials and signage would be positioned at the top of the access walkway. Services and fuel feeds would run in cable troughs below the access walkway.
 - o Marina pontoons - The marina, which consists of six piers, would be connected to the shoreline via a pedestrian access walkway and main walkway, which would be 2.5m wide. The finger piers for the berths would vary in length and spacing depending on the size of the vessel they can accommodate. Generally, finger piers would be between 1.0m and 2.0m wide depending on their length.
 - o Fuel pontoon, pump out and associated facilities - The precise location of the fuel pontoon has yet to be established; however, it is likely to be at the landward end of the westernmost pier (Pier A), fed from a new 15,000 litre double skinned tank located on land. The actual position for this tank has still to be decided. Distribution would comply with the latest regulations and the air pressure within all the pipework within Pier A would be double skinned and monitored. A pump-out facility would also be located near to the fuel pontoon at the landward end of Pier A.
 - o RNLI Afloat Lifeboat - It is expected that the RNLI would relocate their temporary arrangement in Holyhead Harbour to the new Holyhead Waterfront marina. A new RNLI lifeboat pen would be built which to enable the RNLI to store and maintain their boats from a dedicated secured access walkway, which would be independent from the rest of the marina, so that the lifeboat can operate privately and separately from the rest of the marina.

The location of the new RNLI facility is still to being discussed with the RNLI; however, it is likely to be close to the shoreline to the west of Pier A.
- A refuse compound would be located in the berth holder's car park and a number of moveable refuse bins located at the top of the access walkway;
 - Relocation of the existing (circa 150) moorings;
 - New Marina Office building incorporating associated welfare, shower and laundry facilities, ancillary commercial spaces and bar/restaurant;
 - 107 No. 1-, 2- and 3-bed apartments housed within 2-4 storey blocks constructed along the new breakwater, with basement car parking and elements of discrete surface parking;
 - 4 No. 2-storey retail/leisure/commercial units along with additional minor ancillary retail/leisure/commercial facilities on reclaimed land along the Newry Beach waterfront, with a combination of basement and surface parking;
 - Covered arcade for community use; outdoor performances and farmers/Christmas markets.
 - Reinstatement of Victorian sunken gardens connecting to new enhanced public realm, landscaping and covered arcade along the promenade;
 - Enhanced access and facilities to Newry Beach;
 - Preservation of existing marina and enhanced Sailing Club facilities with direct links to new marina;

- New area of accessible beach adjacent to Mackenzie Landing;
- Enhanced public realm, public art, landscaping, pedestrian/cycle links and parking provision around existing museum/restaurant; and,
- Improved linkage from the marina promenade through to the Great Breakwater Country Park.

3.3.1.2 Zone 2: Porth-y-Felin

The Porth-y-Felin zone is centred on the re-instatement of the currently derelict Listed Building Porth-y-Felin House within an enhanced landscaped setting, along with the delivery of residential accommodation with development mostly on land reclaimed from the sea and would predominantly comprise:

- A new promenade wall – to define the new shoreline and to close the area of land reclamation;
- Restoration and conversion of the listed building ‘Porth-y-Felin House’ into residential use incorporating 5 No 2- and 3-bed apartments;
- 95 No. 1-, 2- and 3-bed apartments and townhouses housed within 2-3 storey apartment blocks along the newly reclaimed Residential Waterfront around a new private yacht basin;
- 31 No. 1-, 2- and 3-bed 2-3 storey townhouses and apartments in the Residential Central area;
- 11 No. 4-bed detached properties in the Residential West area; and,
- Improved vehicular/pedestrian access to Soldier’s Point and the Breakwater Country Park.

3.3.1.3 Zone 3: Soldier’s Point

Development in this zone is focused on bringing the currently derelict Soldier’s Point buildings back into use and comprises:

- Restoration and conversion of Listed Building ‘Soldier’s Point House’ into residential use incorporating 4 No 2- and 3-bed apartments, along with restoration and conversion of the adjacent stable yard out-buildings into residential use incorporating 2 No 3-bed apartments;
- Provision of 4 No 1- and 2-bed holiday lodges located within the landscaped area external to the Misted Screen Wall; and,
- Enhanced physical linkages to the Great Breakwater.

3.3.1.4 Zone 4: The Greens

Development in this zone is intended to form a buffer/link and include the enhancement of green space within the development, marine storage and parking overflow to include:

- Enhanced amenity grassland within The Greens, forming a southern boundary;
- Winter lay-up provision;
- Public/overflow summer parking provision for Marina users; and,
- An approach link to Porth-y-Felin.

3.3.2 Access

3.3.2.1 Pedestrian

In terms of accessibility, the new pedestrian linkages would offer the following:

- Access to the full length of new breakwater;
- Access to the promenade across the reinstated sunken gardens and expanded landscape realm with safe separation from the main car park via elevated walkways; and,
- Access from the improved Newry Beach along the full length of coast to Soldier's Point and the Great Breakwater.

3.3.2.2 Vehicular

Vehicular linkages within the Proposed Development would be retained largely as existing, in terms of the main infrastructure, but would also offer the following improvements:

- Managed access to the full length of new breakwater;
- The car park serving the new marina and its associated uses would be principally be located below ground beneath the commercial units, with elements of surface parking partially concealed through the use of existing topography;
- New access would be created to the proposed marina apartments which would also feature basement car parking facilities along with discrete surface parking facilities;
- 'Drop-off' parking arrangements for the new marina and its associated uses;
- Servicing access to promenade leisure accommodation via main car parks;
- The waterfront link road between the residential apartments and the marina commercial area is to be disconnected to fully enhance and protect the landscaped public realm between the two zones;
- Vehicular accessibility to Soldier's Point and Porth-y-Felin House would be enhanced;
- Porth-y-Felin dwellings and terraced townhouses will have dedicated surface parking and/or garages while the principal apartment blocks will be served by basement car parking concealed beneath the community park;
- Soldier's Point car parking will be discretely located out of sight of public gaze;
- Existing cycling routes (numbers 5 and 8 of the Anglesey Coastal Cycle Route) would be retained and enhanced to provide links to key visitor/tourist attractions, with the minor lane past Porth-y-Felin House being a dedicated cycle path; and,
- Accessibility to existing marina, slipway and storage yard would be retained and improved.

3.3.3 Landscaping

Development of the landscape, soft and hard, public and private within the overall design proposals is integral to the design process. The treatment of spaces between zones of built development is just as important as the buildings themselves and assists in the delivery of a cohesive and legible development for the benefit of all users, both pedestrian and vehicular.

The landscape proposals within each development zone, whilst still strategic at this stage of the project, have been developed using the following design principles:

3.3.3.1 Zone 1 – Newry

- Topography has been utilised in order to retain views over the Proposed Development thereby minimising the impact upon existing vistas;
- Balancing the harder landscaping required around the new marina with the soft formal gardens and the adjacent open grassland;
- Reinstatement of the formal gardens including sunken area and further extending the formal area northwards into a new landscaped realm connecting directly with the promenade; and,
- Formation of destination nodes including the terraced inlet, amphitheatre and covered arcade along the Newry promenade.

3.3.3.2 Zone 2 – Porth-y-Felin

- Topography has been utilised in order to capitalise on the existing lush landscape frontage to Porth-y-Felin House;
- Creation of a natural country park between Porth-y-Felin House and the new residential development;
- Creation of a yacht basin at the heart of the residential development along with communal open space/park;
- Retention of key visual linkages within the residential development to maintain key views of the two key Listed Buildings to maintain a sense of place and context;
- Provision of private garden areas to majority of terraced dwellings and townhouses; and,
- Retention of greater privacy than the Newry promenade area but still maintaining connectivity through visual linkage.

3.3.3.3 Zone 3 – Soldier's Point

- Provision of private, formal landscape within, and immediately abutting, the enclosed environs of Soldier's Point house and Out-Buildings;
- Retention of existing naturalistic, regenerated vegetation in the surrounding parkland to provide naturalistic defensive planting for the private residences;
- Retention and conservation of key historical features and follies within the landscape; and,
- Provision of public linkages with the Great Breakwater and the Country Park including a new raised causeway linking these to the Porth-y-Felin residential area.

3.3.3.4 Zone 4 – The Greens

- Retention and enhancement of existing landscaping which runs to the water's edge including the creation of new pedestrian linkages back towards the town;
- Creation of new vehicular and pedestrian causeway link around and/or across the Porth-y-Felin inlet; and,
- Retention of the existing grasslands 'The Greens'.

3.3.4 Summary of the Proposed Development

In summary, the Proposed Development offers the following attributes that would contribute to the development of a sustainable community that complements and enhances the existing town of Holyhead and retains the natural beauty of the coastal environment to the north-west. In response to its immediate and wider built and natural environment, the masterplan has been designed cognisant of the Site's strengths such that the overall Proposed Development now offers the following:

- Full linkage and interaction between the town centre and ¾ mile of coastal environment, with broader linkages to the Country Park;
- Preservation of existing panoramic views;
- Preservation and enhancement of multiple listed structures within the Holyhead Conservation Area;
- Preservation of the existing coastal environment;
- Introduction of new and commercially sustainable mixed-uses;
- Creation of a variety of independent character areas that complement each other and work as well together as they do in isolation;
- Regeneration of commercial opportunities through the introduction of modern and attractive marina and visitor, tourist and training facilities;
- Public realm enhanced through beach, garden, promenade and coastal linkages/improvements; and,
- Creation of new homes for both the local population and boat owners.

The Proposed Development is expected to contribute to the continued regeneration of Holyhead, providing significant employment opportunities, residential and leisure facilities and to act as a catalyst to further investment and initiatives in the local area. It is anticipated that the Proposed Development would take approximately seven years to be completed in its entirety; however, this is likely to occur on a phased basis, influenced by prevailing commercial conditions.

3.4 Alternatives

The issue of alternatives stems primarily from EIA Directive 2014/52/EU. Article 5 of the Directive identifies the information for inclusion in ES's where paragraph 1(d) requires that the ES shall include:

“a description of the reasonable alternatives studied by the developer, which are relevant to the project and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the project on the environment”.

This sub-section considers the alternative scenarios which have been investigated under the following headings:

- Consideration of the “do nothing” scenario where the Proposed Development is not progressed; and,
- Consideration of alternative designs for the Proposed Development.

3.4.1 The “Do Nothing Approach”

The site currently comprises a large area of partially developed land consisting of a mix of land-uses including nominal residential accommodation, public open space, and the derelict, listed buildings of Porth-y-Felin and Soldier’s Point House.

The Proposed Development provides an excellent opportunity to improve and enhance Holyhead’s status as a national and international tourism destination and create a setting that responds to the Beach Road Conservation Area and its listed buildings. The Proposed Development would enhance the appeal of Holyhead as a popular tourist attraction and provide improvements to an existing, well-known, destination.

The “do nothing” scenario is not considered to be an acceptable option as it would represent a missed opportunity and perpetuate the under-use of a well-established tourist destination and potentially exacerbate an already bleak economic outlook.

3.4.2 Alternative Designs

The design proposals for the Proposed Development have been focussed from the outset on achieving an appropriate mix of uses and the manner in which the uses interrelate and generate wider linkages to promote regeneration of use and activity.

Early ideas for the possible form of the marina moved from organic forms to a more traditional rectilinear format to better suit a more efficient mooring capacity within the optimum development area. By keeping the overall marina area down, the resulting scale and mass of the marina are more appropriate to the context and have a minimal impact upon marine activity within the wider harbour area.

Once this early decision on the general form of the marina and new breakwater has been made, the design proposals developed in a linear manner with progressive update and refinement rather than a series of differing solutions from which the most appropriate was selected.

In determining the range of appropriate uses, and the location of these along the waterfront, there were a number of contextual aspects that combined to form key design generating parameters:

- Physical linkages – pedestrian and vehicular;
- Visual linkages – vistas, panoramic views;
- Optimising visible activity – balancing compatible uses and proximities;
- Clear definition of public and private space with the variety of associated ambiance in each; and,
- Retention of openness and existing landscape characteristics.

The arrangement of the built accommodation within the marina and Porth-y-Felin areas has developed consistently with subtle but important refinements along the way. These successive changes both during the original 2014 Illustrative Masterplan design process and subsequent, more recent, detailed design development can be summarised as follows:

- Residential accommodation developed along the full frontage of the marina breakwater and promenade. Residential accommodation at Porth-y-Felin arranged as a crescent responding to the general form of the existing topography;
- Apartments to the marina promenade modified to a radial arrangement allowing penetrating views from Beach Road out across the marina. A more linear format developed for the Porth-y-Felin

properties to increase the accommodation numbers and consequently achieve a more appropriate scale and mass for the identity and sustainability of this element of the community;

- Extent of residential accommodation reduced along the marina promenade. Linear arrangement of apartments along the marina breakwater located along the marina side to create a direct relationship between the residences and the marina;
- Marina breakwater properties split into shorter blocks to promote enhanced views across the breakwater both east and west. Residential properties along marina promenade omitted in favour of small-scale commercial uses to improve the balance of mixed uses and compatible activities, also enhancing the extent of public realm and accessibility for the general public.
- Porth-y-Felin properties arranged as clustered courtyards within a protective outer band of apartments creating an inner community with a sense of separation from the more public activities within the marina area and Soldier's Point;
- Marina apartments arranged at junction of marina promenade and new breakwater to create pivotal focal point and filter between the residential use of the breakwater and the commercial activity along the promenade; and,
- Post granting of Outline Planning Permission, a reduction in scale of the marina, breakwater, land reclamation and scope of built environment generally.
- Pivotal focal point enhanced within the marina residential development with introduction of terraced inlet and small-scale commercial outlets. Public realm enhanced by relocation of majority of parking provision below ground – for both residential and commercial zones.
- Physical separation between the residential and commercial developments introduced along marina, abutting the Sunken Garden, to expand public realm and further enhance visual linkages from Beach Road out to the marina and beyond.
- Introduction of a yacht basin and adjacent formal park area within the heart of the Porth-y-Felin residential scheme to provide pivotal focal point. Creation of a central boulevard dissecting the residential scheme with visual linkage to Soldier's Point; and,
- Conversion of both Soldier's Point buildings and Porth-y-Felin House into residential apartments within extended natural curtilage of surrounding parkland to preserve settings of these Listed Buildings.

4 Stakeholder Consultation

4.1 Introduction

Informal consultation has been undertaken with the appropriate authorities, primarily NRW and the IoACC, as part of this pre-application process. In addition, this section also presents formal consultation responses received on the S73 application which are relevant to this application.

4.2 Marine and Coastal Ecology Survey Specification

Consultation was undertaken with the Marine Area Advice and Management department of NRW to confirm the scope of the marine ecology surveys, required to validate the intertidal and subtidal marine ecology surveys undertaken in 2009 to inform the 2010 and 2020 ES. It was agreed with NRW (**Appendix D1**) that the following would be implemented:

- An intertidal walkover survey between Holyhead Boatyard and Soldier's Point⁶; and,
- A subtidal video transect survey.

4.3 Sediment Sample Plan

Consultation was also undertaken with NRW's Marine Licencing department to confirm the requirement for sampling and chemical analysis of the sediment within the proposed dredge area. Cefas responded on the 19th March 2020 (reference SP2003; **Appendix D2**) to confirm that sub-samples would be required from five of the 10 proposed vibrocore locations within the Proposed Development area (VB-01, VB-03, VB-04, VB-06 and VB-10). Cefas also confirmed that the following analyses would be required to confirm whether the material is suitable for offshore disposal:

- Trace metals (cadmium, chromium, copper, mercury, nickel, lead, zinc and arsenic);
- Organotins;
- Total hydrocarbons;
- Polycyclic aromatic hydrocarbons (PAHs);
- Polychlorinated biphenyls (PCBs); and,
- Particle Size Analysis (PSA).

The sediment quality survey was undertaken on the 16th and 17th July 2020. Due to the presence of numerous mooring chains, anchor blocks and debris on the seabed associated with the previous Holyhead Marina, it was not possible to collect cores at VB-01 and VB-03. Consequently, these were moved approximately 100m to the north. In addition, sample VB-07 was moved to within the footprint of the Porth-y-Felin reclamation area and also subsampled for chemical analysis (in addition to the five samples required by Cefas).

4.4 Section 73 consultation responses

Formal consultation responses on the 2020 ES were received from the IoACC (on the 10th March 2020) and NRW (on the 13th May 2020). These are presented in **Appendix D3** and **D4** and are summarised in **Tables 4.1** and **4.2**, respectively. These comments will be considered in the ES.

⁶ Subsequent to consulting with NRW, it was decided to extend the intertidal survey to the culvert under Black Bridge in order to provide information on the ecology of the intertidal habitats outside of the direct footprint of the Proposed Development.

Table 4.1 IoACC comments on the S73 application

Topic	IoACC comment
Biodiversity Loss	The IoACC advise that in order to ensure biodiversity gains, there would need to be a detailed clear assessment of losses, with proposed mitigation action points set against these, for both onshore and marine areas affected. For onshore biodiversity, it is unclear whether overall enhancement would be feasible in the area involved. If not, ecological management of further areas of land, which have not featured within the proposals before, would be required. Losses in marine / intertidal habitats and their associated species appear at present to be completely unmitigated. Consideration needs to be given as to how these losses can be mitigated, and this would certainly require the bringing-in of other areas to achieve this.
Appropriate Assessment	In order for an Appropriate Assessment to be undertaken, the applicant is requested to provide information relevant to this matter, namely figures for local population increase, projected recreational visits to the SAC etc., in light of the proposal.

Table 4.2 Comments from NRW on the S73 application

Topic	NRW Comment
Visual effects	The Planning submission should include outline colour and lighting design parameters to conserve the setting of the AONB.
Biosecurity	A Biosecurity Risk Assessment should be submitted to support future applications.
Protected Sites	A Conservation Management Plan should be provided detailing the management measures and funding to be provided in order to mitigate increases in recreational use of protected sites.
Coastal Processes	Cumulative effects on coastal processes with the Holyhead Port Expansion project and any future re-development of the Holyhead Marina should be assessed. It should be clarified whether the new semi-enclosed marina will result in the need for periodic maintenance dredging to maintain sufficient water depth in the marina.
Marine Ecology	The littoral and sublittoral rock biotopes within the footprint of the development should be considered as Annex 1 rocky reef habitat which should give them a higher importance in any assessment. NRW propose that areas of littoral or sublittoral rock within the direct footprint of the development should be calculated with appropriate mitigation measures presented in order to help mitigate the loss of this habitat. Such measures may take the form of biodiversity enhancement measures associated to the construction of the artificial marina and land reclamation waterfront development area. Limited information has been presented to justify the assessment of 'Negligible / Not significant' in relation to minimising spread during construction / operation activities. The potential risks posed by INNS should be included in the HRA assessment. NRW consider that in the absence of good biosecurity measures for construction and operational activities, the proposed development has the potential to spread marine INNS, therefore potentially impacting the features of marine SACs around Wales e.g. Menai Strait and Conwy Bay SAC. The applicant should present information to quantify habitats directly and indirectly affected in relation to increases of suspended sediment concentrations as a result of construction activities.
WFD Assessment	The loss of intertidal and subtidal habitat should be assessed as an operational phase impact within the WFD Assessment. Secondary effects to habitats and species arising from changes to hydrodynamics, wave climate and sediment transport should be considered in the WFD Assessment.

5 Scoping of Environmental Effects

5.1 Hydrodynamics, Sedimentation and Wave Climate

5.1.1 Introduction

This section presents an overview of the previous work undertaken on hydrodynamics, sedimentation and wave climate within the 2020 ES. It then summarises the anticipated potential effects of the Proposed Development followed by a description of the proposed methodology to predict the magnitude of those effects during the subsequent phase of the EIA.

5.1.2 Previous work undertaken and new information on the baseline environment

A desk study utilising published data, field surveys, and existing site-specific analyses was completed to support the 2020 ES and update the baseline information presented within the 2010 ES. These studies included the Holyhead Waterfront Engineering Study (Black & Veatch, 2010) and geophysical surveys (bathymetry and shallow geology) undertaken by Shoreline Surveys in 2010. The following baseline information was presented:

- A bathymetric survey of the Proposed Development site was completed by Shoreline Surveys in January 2010 and shows that the site gradually slopes seawards (north) from the coast to a depth of -6m CD about 300m offshore.
- The tides of Holyhead Harbour are regular and semi diurnal, with predicted spring and neap tide ranges of 4.9m and 2.4m, respectively.
- Holyhead Harbour would be susceptible to storm surges because of meteorological conditions such as low barometric pressure and strong winds. Water levels at the site could become elevated above those of the predicted astronomical tide.
- The spring tidal prism (the volume difference between high water spring and low water spring excluding any contribution from freshwater inflow) for the development site is 5.9Mm³. The neap tidal prism is 2.9Mm³. For these calculations, the Proposed Development site is defined as the area to the west of the line between the elbow of the Great Breakwater and the most northwest point of Salt Island (1.2Mm²).
- The nearest Admiralty tidal stream is located immediately outside the entrance to Holyhead Harbour. Here, flows are generally to the east on the flood tide and to the west on the ebb tide, with velocities between 0.1m/s and 0.7m/s during spring tides and 0.1 to 0.4m/s during neap tides. The currents directly related to the tidal filling and emptying of the Proposed Development site are less than 0.05m/s (maximum average flow rate at half tide) and to circulate gently clockwise.
- Modelling completed by Black & Veatch to inform the 2010 ES predicted that at the Proposed Development site, offshore waves would be reduced to about 0.5m, which is less than 10% of their original height. Locally generated waves from the east-northeast are also predicted to be about 0.5m high at the Proposed Development. Controls on vessel speed and the presence of the proposed new breakwater mean that ship wash is unlikely to be significant at the Proposed Development Site.
- A geophysical survey of the Proposed Development site completed by Shoreline Surveys in 2010, shows that rock is at or close to the seabed. The overlying sediment varies in thickness from 0m to about 2m over most of the site and was interpreted by Shoreline Surveys as a mix of broken rock,

shale, sand and clay, with greater clay volumes further offshore, where the unit is thickest. The area has not previously been dredged.

- Aerial photographs of the area describe build-up of sediment on the east side of groynes along the east coast of the Proposed Development site, indicating that longshore sediment transport is from east to west. However, further west, the protection afforded by structures (marina car park and facilities) and the Great Breakwater, and the presence of rock outcrops indicate that sediment transport rates are very low, and effectively zero. Longshore transport is not adding or removing beach sediment.

5.1.3 Identification of key issues

The findings of the 2020 ES were that the Proposed Development would have a negligible, i.e. not significant, effect upon hydrodynamics, wave climate and sediment transport, locally and in the wider Holyhead Harbour. The potential effects on hydrodynamics, sedimentation and wave climate associated with the revised Proposed Development are set out below.

5.1.3.1 Construction

- Short term increases in suspended sediment concentration in the plumes generated by construction of the structures, land-claim and capital dredging and disposal operations; and,
- Morphological change to subtidal and intertidal areas through deposition of sediment from the plumes generated by construction of the structures, land-claim and capital dredging and disposal operations.

5.1.3.2 Operation

- Changes to the wave regime caused by the presence of the Proposed Development;
- Changes to the tidal current regime caused by the presence of the Proposed Development including changes in the tidal prism as a result of the proposed land-claim; and,
- Changes in sediment transport and deposition driven by changes to waves and tidal currents caused by the presence of the Proposed Development.

5.1.4 Approach to providing required information

To further inform the existing hydrodynamics, sedimentation and wave climate baseline, additional data and information will be obtained, including:

- A survey to characterise sediment composition in the intertidal zone;
- A video transect survey to characterise the subtidal seabed;
- Analysis of the vibrocore survey to determine if dredging is required;
- Seabed sediment sampling within the proposed dredge footprints with samples sent for particle size analysis; and,
- Hydrodynamic, wave transformation and wave penetration modelling to support design of the Proposed Development, which can also be used to support the environmental assessment.

5.2 Traffic and Transportation

5.1.1 Introduction

This section presents an overview of the previous work undertaken on traffic and transportation within the 2020 ES. It then summarises the anticipated potential effects of the Proposed Development identifies the extent to which the 2020 ES in relation to traffic and transportation remains valid and to agree the scope of the assessment required to inform the EIA.

5.1.2 Previous work undertaken and new information on the baseline environment

The transport-related work which was undertaken as part of the 2020 ES comprised an ES Chapter on traffic and transportation and a Transport Assessment (TA). In summary, both documents take into account the new baseline information and relevant changes to legislation since the 2010 ES was produced. Specifically, this involved commissioning fresh traffic survey data and accounting for the most recently available information in relation to transport planning policy and guidance, Personal Injury Accident (PIA) data on the local highway, and new local committed developments (so as to provide a suitable cumulative assessment), amongst other things.

The scope of the 2020 ES followed the same technical methodologies adopted in the 2010 ES for the originally approved outline application, albeit updated to reflect the latest policy, guidance, and baseline conditions. The scope of the transport-related work contained within the 2020 ES included:

- The junctions / links on the local highway network that form the basis of the 2020 ES study area are presented in **Table 5.1**. The study area is based on the same locations assessed as part of the 2010 ES work, as discussed and agreed at the time with the IoACC and WG.
- Fresh traffic surveys were undertaken on Wednesday 20th February 2019 and Saturday 23rd February 2019 between 07:00 and 19:00 at the junctions set out in **Table 5.1** in order to account for latest conditions on the local highway network.
- Automatic Traffic Count (ATC) surveys were also undertaken during the week of Wednesday 20th – Tuesday 26th February 2019 (inclusive) at the following locations:
 - o Beach Road (between Gwelfor Avenue and Walthew Avenue);
 - o Beach Road (between Newry Fawr / Victoria Road); and,
 - o Victoria Road (between Boston Street / Victoria Terrace).
- An appraisal of the PIA data on the immediate local highway with reference to the most recently available full 5-year search period (2014-2018 inclusive) on Crashmap. The review demonstrated that the accident record does not present any material local safety concerns that would bring the Proposed Development.
- In accordance with IEMA Guidelines a review of Traffic-Related Environmental Impacts was also undertaken. The results of the assessment demonstrate that the Proposed Development would only result in slight, and therefore insignificant, impacts on traffic-related environmental effects in all sub-topic areas, except driver delay, where major adverse effects at two junctions were forecast along Victoria Road. Off-site traffic-related environmental mitigation measures were therefore considered necessary.

- It was recognised that existing constraints on the local highway network were likely to lead to driver delay / capacity impacts at two off-site junctions. The following off-site mitigation measures were therefore proposed:
 - o Signalisation of the existing priority give-way junction of Boston Street with Victoria Road – comprising a simple two stage arrangement with pedestrian crossing facility to Boston Street; and,
 - o Implementation of a ghost island right turn facility at the Victoria Road/Market junction.

A cumulative effects assessment was undertaken which showed that it is not considered likely that there would be any significant cumulative highway-related environmental effects associated with the Proposed Development.

Overall, the conclusion of the 2020 ES Chapter on traffic and transportation was consistent with the conclusion of the 2010 ES – that with the proposed mitigation in place, the transport-related residual effects would be negligible or slight (adverse) in nature, which is insignificant.

Given that there is no new information that would need to be considered, the baseline data is therefore still representative of current baseline conditions and remains valid to inform the EIA.

Table 5.1 2020 ES Study Area (Highway Junctions / Links)

Kingsland Roundabout
A55 North Wales Expressway
Kingsland Road (South)
Fire Station Access
Kingsland Road (North)
A55 Victoria Road
Victoria Road / London Road Black Bridge Signals
Victoria Road (South)
London Road Black Bridge
Victoria Road (North)
Victoria Road / Market Street
Victoria Road (South)
Market Street
Victoria Road (North)
Victoria Road / Boston Street
Victoria Road (South)
Boston Street
Victoria Road (North)
Beach Road
Beach Road (East)
Beach Road (West)

5.1.3 Identification of key issues

From a transport-perspective, the reduced scale of the Proposed Development would, by definition, reduce the vehicle and footfall trip generation and therefore the environmental effects of the development-related traffic generated by the Proposed Development and any associated effects would therefore be lower than previously assessed.

As such, no key issues resulting from the changes in design of the Proposed Development have been identified from a transport perspective.

5.1.4 Approach to providing required information

The potential impact of traffic associated with the Proposed Development will be considered through the preparation of a formal TA report. In summary, the TA will:

- Describe the existing conditions, including the land uses and operations that currently occur on the wider site;
- Present the recent accident records on the highway network;
- Appraise the site's accessibility to sustainable transport modes;
- Forecast the trips that are likely to be generated during the operational and construction phases of the Proposed Development; and,
- Assess the impact of these trips on the local highway network, taking account of nearby committed developments and future background traffic growth.

The scope of the TA has recently been discussed with the IoACC and agreed in principle; however, a formal response has not yet been received.

5.3 Air Quality

5.3.1 Introduction

This section presents an overview of the previous work undertaken on air quality within the 2020 ES. It then summarises the anticipated potential effects of the Proposed Development followed by a description of the proposed methodology to predict the magnitude of those effects during the subsequent phase of the EIA.

5.3.2 Previous work undertaken and new information on the baseline environment

The Air Quality Chapter of the 2020 ES assessed the likely significant impacts and resulting effects of the Proposed Development on local air quality. The principal aspects considered in the Chapter were:

- Dust: potential effects of disamenity dust and fine particulate matter (PM₁₀) arising during earthworks / construction activities; and,
- Vehicle exhaust emissions: potential effects of vehicle exhaust emissions (NO_x / NO₂ and PM₁₀) arising from traffic generated by the proposal.

The Chapter described the methods used to assess the baseline conditions currently existing at the Proposed Development Site and surroundings, the potential severity of direct and indirect air quality impacts of the Proposed Development, and the mitigation measures required to prevent, reduce or offset the potential impacts and the significance of residual effects.

In undertaking the assessment to inform the 2020 ES Air Quality Chapter, the following activities were carried out:

- Site visit to view the Proposed Development Site, surrounding environs and local road network;
- Identification of potentially sensitive human and ecological receptors;
- Review of Proposed Development information including layout and proposed activities;
- Review of baseline air quality, potential local air emission sources and Local Air Quality Management (LAQM) / Defra / North Wales Combined Authority air quality reports and data;
- Review of appropriate meteorological data including local wind speed and direction statistics;
- Qualitative construction dust assessment considering potential sources of dust, location and orientation of receptors, prevailing wind direction and any present screening, in accordance with current guidance;
- Qualitative vehicle emissions assessment through review of vehicle movements;
- Atmospheric dispersion modelling of vehicle emissions (NO_x / NO₂ and PM₁₀) using an atmospheric dispersion model (ADMS-Roads);
- Overall assessment of potential impacts on human and ecological receptors and significance of effects; and,
- Provision of recommendations for additional mitigation measures and assessment of residual effects.

The baseline air quality environment was primarily determined from the site visit and review of mapping information and background air quality data. There have not been any substantial changes to the local background environment that would require further consideration by the EIA.

At the time of preparation of the Chapter, the most up to date local air quality monitoring data available was for 2017, as reported in the North Wales Combined Authority 2018 Air Quality Progress Report. At present no other more up to date data has been published. However, should any more recent data be available this would be reviewed to inform the EIA. Any such data is however unlikely to result in any substantial alterations to the previous air quality assessment.

In addition, atmospheric dispersion modelling of vehicle exhaust emissions was carried out to determine the potential background pollutant concentrations at the identified receptors due to the existing traffic movements on the local road network. This was based on baseline traffic data provided by Axis for 2019 using Defra predicted background air quality data and vehicle emission factors for 2019. There have been no changes to these sources of information that would require further consideration by the EIA.

There has also been no changes to the legislation and guidance that were referred to in the 2020 ES Air Quality assessment. As such, no revisions or update to the approach and methodology are required.

5.3.3 Identification of key issues

The Construction Dust Assessment assessed the potential for fugitive dust that may arise during the demolition, earthworks and construction phases of the project, and from track-out from the access points, to impact nearby sensitive receptors through both soiling and human health effects. The assessment took into account the size of the Proposed Development and the sensitivity of the surrounding area. Through the incorporation of standard dust mitigation measures during the construction works, no unacceptable impacts on human health, amenity or ecological receptors were identified.

Similarly, no unacceptable impacts on human health, amenity or ecological receptors were identified as potentially arising from the exhaust emissions associated with the additional traffic that would arise from the Proposed Development.

The changes in the design of the Proposed Development would not be expected result in any significant changes to those conclusions. It is anticipated that the proposed revisions would result in a slight reduction in the associated traffic movements, and hence a reduction in vehicle exhaust emissions, and hence lower potential pollutant concentrations at receptors.

5.3.4 Approach to providing required information

Any available more recent background air quality data would be reviewed as necessary to confirm the baseline status. In addition, any revised traffic data for the Proposed Development would be reviewed as appropriate. A revised Screening Assessment of the predicted changes in traffic flows would be presented. At this stage it not envisaged further detailed assessment entailing revised atmospheric dispersion modelling would be required. However, in the event the changes in the proposed design do result in substantial changes on the originally presented traffic data, then revised modelling and assessment would be carried out if deemed appropriate.

5.4 Landscape, Seascape and Visual Effects

5.4.1 Introduction

This section presents an overview of the previous work undertaken on landscape, seascape and visual effects within the 2020 ES. It then summarises the anticipated potential effects of the Proposed Development followed by a description of the proposed methodology to predict the magnitude of those effects during the subsequent phase of the EIA.

5.4.2 Previous work undertaken and new information on the baseline environment

Chapter 9 of the 2010 ES (with supporting Figures and Appendices) comprised the Landscape and Visual Impact Assessment (LVIA) of the development as then proposed. Further information was prepared in 2012 as part of the Regulation 19 submission, which considered effects on seascape and night-time effects, and visual effects from an additional viewpoint location.

As part of the subsequent s73 application submitted in February 2020, the LVIA was updated to reflect the current landscape and visual baseline and to reflect any changes in guidance and legislation that had taken place since the previous submissions. The updated LVIA formed Chapter 7.0 of the 2020 ES.

Previous assessment work was undertaken in 2010, 2012 and 2020 as described above. This identified:

- Effects upon the physical fabric of the Proposed Development Site;
- Effects upon the character of the surrounding landscape and seascape;
- Visual effects, including from a series of viewpoints, the locations of which were agreed with the IoACC (and which included locations requested by NRW);
- The night-time effects of the Proposed Development;
- Effects on the Anglesey Area of Outstanding Natural Beauty (AONB); and,
- Cumulative landscape and visual effects (which were reported in Chapter 14 of the 2020 ES).

As part of the ongoing design process, the location of viewpoints for the Reserved Matters submission were agreed at a meeting with the IoACC in January 2020, prior to the Council's decision not to accept Reserved Matters applications. Nine of the ten viewpoints included in the 2020 ES will also be included in the updated assessment. Viewpoint 6 will be replaced by two new locations (Viewpoints 6a and 6b respectively). Three further locations included in the Design and Access Statement for the previous submission will also be included in the updated assessment. The agreed viewpoints are set out in **Table 5.2** below, and locations are illustrated on **Figure 5.1**.

Table 5.2 Viewpoint locations

Viewpoint	British National Grid Co-ordinates	Viewpoint Details	Source
1: Holyhead Mountain	222086, 383290	<i>Representative</i> of views from the footpaths on the eastern side of the mountain	2020 ES
2: Ty Mawr	222958, 383164	<i>Representative</i> of views available to path users	2020 ES

Viewpoint	British National Grid Co-ordinates	Viewpoint Details	Source
3: Holyhead Breakwater	224270, 384196	<i>Representative</i> of views across Holyhead Harbour from the Great Breakwater	2020 ES
4: Holyhead Breakwater	223891, 383980	<i>Representative</i> of views across Holyhead Harbour from the Great Breakwater	2020 ES
5: Gorlan	222742, 382880	<i>Representative</i> of views available to residents at Gorlan	2020 ES
6a: Beach Road	224095, 383240	<i>Representative</i> of views available to local residents	Identified in consultation with IoACC, as part of discussions regarding the Reserved matters submission
6b: Gwelfor Avenue	224195, 383230	<i>Representative</i> of views available to local residents	Identified in consultation with IoACC, as part of discussions regarding the Reserved matters submission
7: Newry Fawr	224549, 383111	<i>Representative</i> of views available to local residents	2020 ES
8: Salt Island Bridge	225057, 382943	<i>Representative</i> of views available to people accessing the ferry terminal	2020 ES
9: Wales Coast Path, west of Site	223410, 383804	<i>Representative</i> of views available to path users	2020 ES
10: Wales Coast Path, Porth Namarch	222399, 383567	<i>Representative</i> of views available to path users	2020 ES
11: Breakwater access road	224000, 383220	<i>Representative</i> of views available to local residents	Viewpoint A from Design and Access Statement
12: Prince of Wales Road/ Newry Fawr	224610, 383150	<i>Representative</i> of view available to roads users, including visitors to the waterfront	Viewpoint B from Design and Access Statement
13: Beach Road	224275, 383210	<i>Representative</i> of views available to local residents	Viewpoint C from Design and Access Statement

5.4.3 Identification of key issues

The design of the Proposed Development has progressed (as described in **Section 1.2.2** above) and is no longer the same as that assessed in the 2010 and 2020 ES'. As such, additional assessment is required to understand if previous conclusions regarding landscape and visual effects remain valid. This process would also identify any relevant changes to the baseline that have occurred since February 2020.

The revised Proposed Development would occupy a different and reduced footprint to the scheme that has been previously assessed. In addition, greater detail regarding the design of the Proposed Development is now available.

As such, the appearance of the revised Proposed Development, and its influence upon the surrounding landscape/ seascape and upon views would not be the same as that which has previously been assessed. Given the nature of the changes, it is not envisaged that any additional significant effects over and above those previously assessed would occur. Given the reduced footprint and the greater level of detail regarding

the design of the Proposed Development (as the previous submissions were based on an outline design), it is likely that some or all effects would be less adverse than previously assessed.

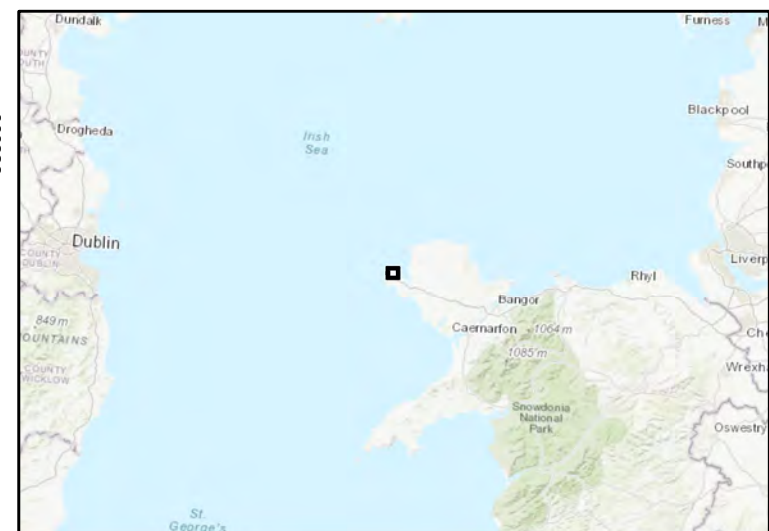
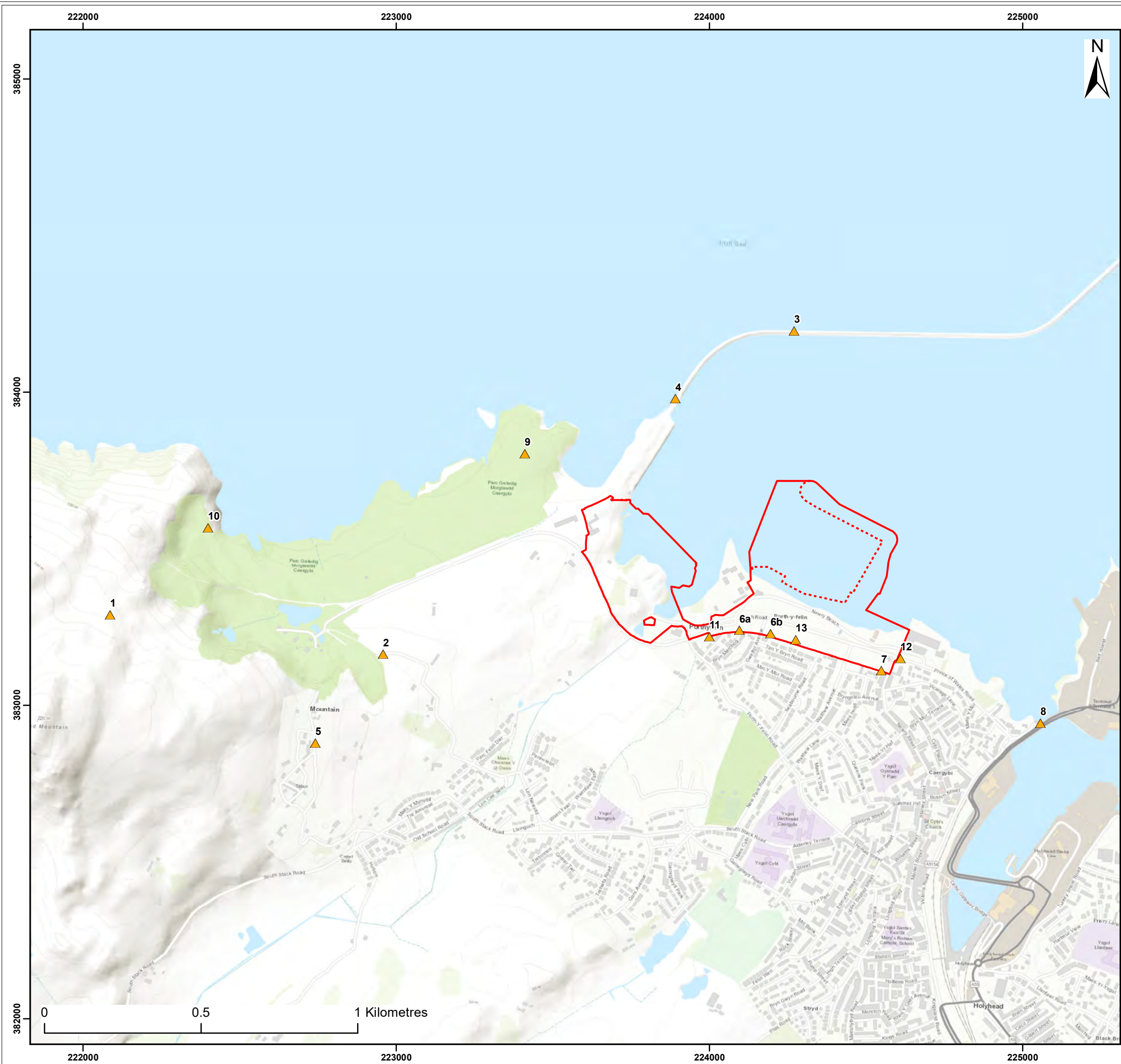
5.4.4 Approach to providing required information

A review of relevant legislation, guidance and baseline information would be undertaken, in order identify any recent changes that are not reflected in the 2020 ES.

The conclusions regarding landscape and visual effects reported in the 2020 ES would be reiterated and for each receptor included in the assessment, any changes to these effects resulting from the revised Proposed Development would be set out. This would be supported by descriptive/ qualitative text and would be undertaken in accordance with good practice guidance as set out in *Guidelines for Landscape and Visual Impact Assessment* (3rd edition 2013, Landscape Institute and Institute for Environmental Assessment).

Photomontages illustrating the appearance of the Proposed Development would be prepared from each of the viewpoints included in the 2020 ES, and each of the additional viewpoints requested by the IoACC. These would inform any conclusions made regarding effects. The photomontages would be produced in accordance with *Visual Representation of Development Proposals. Technical Guidance Note 06/19* (2019, Landscape Institute), and in relation to the types of visualisation set out in this guidance, would be Type 3 (Photomontage). Where viewpoint locations remain the same as in the 2020 ES, the existing photography taken in 2019 would be used.

Any cumulative schemes not considered in the 2020 ES would be identified and the cumulative landscape and visual effects of the Proposed Development will be assessed.



Legend:

- Holyhead Waterfront Red Line Boundary
- ▲ Viewpoint locations
- 1: Holyhead Mountain
- 2: Ty Mawr
- 3: Holyhead Breakwater
- 4: Holyhead Breakwater
- 5: Gorlan
- 6a: Beach Road
- 6b: Gwelfor Avenue
- 7: Newry Fawr
- 8: Salt Island Bridge
- 9: Wales Coast Path, west of Site
- 10: Wales Coast Path, Porth Namarch
- 11: Breakwater access road
- 12: Prince of Wales Road/ Newry Fawr
- 13: Beach Road

Base map: Sources: Esri, HERE, DeLorme, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, MapmyIndia, © OpenStreetMap contributors, and the GIS User

Client:	Project:
Conygar Holyhead Ltd	Holyhead Waterfront Regeneration Scheme

Title:
Viewpoint locations

Figure: 5.1		Drawing No: PB8908_RHD_ZZ_XX_DR_Z_0030			
Revision:	Date:	Drawn:	Checked:	Size:	Scale:
02	10/09/20	AB	SM	A3	1:12,000
01	13/08/20	JT	SM	A3	1:12,000

Co-ordinate system: British National Grid



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5.5 Ecology and Nature Conservation

5.5.1 Terrestrial Ecology

5.5.1.1 Introduction

The Proposed Development has the potential to impact both directly and indirectly on the terrestrial ecology of the Proposed Development Site and surrounding area, both through its construction and operational phases. Potential impacts to terrestrial ecology receptors were considered within the 2020 ES. In light of the changes to the Proposed Development detailed in **Section 1.2.2**, further assessment is necessary. Note that ornithological receptors are considered separately in **Section 5.5.3**.

Further information on potential adverse effects on the designated features of Holy Island Coast / Glannau Ynys Gybi SPA is outlined in **Section 7** and are not considered in this section.

5.5.1.2 Previous work undertaken and new information on the baseline environment

Previous work undertaken

The 2020 ES considered the following statutory and non-statutory designated terrestrial sites detailed in **Table 5.3** and **Table 5.4** respectively, and shown on **Figure 2.1**, these sites remain valid for further consideration.

Table 5.3 Statutory designated terrestrial sites considered in assessment

Site	Status	Interest Features	Distance from Proposed Development Boundary
Holy Island Coast/Glannau Ynys Gybi	SSSI	Heathland and maritime grassland communities, coastal cliffs and ledges, assemblages of vascular plants, birds and invertebrates	0.1km

Table 5.4 Non-statutory designated sites considered in assessment

Site	Status	Interest Features	Distance from Proposed Development Boundary
Chwarel Morglawdd	LWS	Eastern section, which overlaps, is an important feeding and nesting area for birds	Overlaps
Cors Tre Wilmot	LWS	Valley herb-rich wetlands	0.8km
Cors Pont Hwfa	LWS	Reed bed, tall fen and marshy grassland	0.9km
Rhostir Mynydd Celyn	LWS	Enclosed pastures, grassland, wet and dry heathland mosaic	1.9km

A suite of updated terrestrial ecological surveys (listed below) were undertaken in 2019 and the findings of which were used to inform the 2020 Ecological Impact Assessment (EclA), including:

- Desk-based review of available existing information (including obtaining biological records) relating to the Site and for up to 2km beyond its boundaries;
- Updated Extended Phase One Habitats Survey (2019 EP1HS);
- Badger survey;

- Suite of Bat Emergence/Re-entry and Activity surveys;
- Presence/absence reptile survey; and,
- Habitat Suitability (HS) Assessment survey of all ponds within and up to 250m from the Proposed Development Site boundary for their suitability to support Great Crested Newts.

The 2019 EP1HS concluded that no priority habitats under Section 7 of the EAW 2016 were present within the Proposed Development Site. The non-priority habitats present were not considered of key significance for sustaining and improving biodiversity in Wales.

Protected species surveys undertaken in 2019 confirmed the presence/potential presence of the following species within the Proposed Development Site and surrounding area:

Bat

The 2019 bat activity surveys concluded that the Proposed Development Site provided limited value to foraging and commuting bat species (namely both *Pipistrellus* species), with records focussed along the linear habitat corridor formed by the sunken lane between Beach Road to Soldier's Point, which is lined by scrub, woodland and grassland. In addition, the Proposed Development Site was deemed to be of low value for roosting bats due to the limited presence of valuable supporting habitat.

Badger

There was suitable habitat for badger (*Meles meles*) within the survey area, including the areas of woodland and scrub; however, no evidence of badger activity was recorded within these areas. During the survey a single badger was observed exiting the grounds of Soldier's Point.

Reptiles

Both common lizard (*Zootoca vivipara*) and slow worm (*Anguis fragilis*) were recorded within the Proposed Development Site during the 2019 presence/absence survey. Habitats present to the west of the Proposed Development Site, within the grounds of Porth-y-Felin House and Soldier's Point and in the fields to the west, had the potential to support foraging, shelter, basking or hibernating reptiles.

Great crested newts

There was no evidence of great crested newts (*Triturus cristatus*) recorded during the surveys. The 2009 and 2019 HS assessments of the single pond located within the Proposed Development Site returned a low Habitat Suitability Index (HSI) score, therefore indicating a 'poor' and 'below average' suitability for great crested newts.

Other Species

There was no evidence of otter (*Lutra lutra*), dormouse (*Muscardinus avellanarius*) or any other protected or priority species was recorded during the surveys.

Invasive non-native species (INNS)

The presence of Japanese knotweed within the Proposed Development Site was confirmed during the 2019 EP1HS. Japanese knotweed is a Schedule 9 plant species under the Wildlife and Countryside Act 1981, as amended, and is regarded as a species of particular concern in Wales. Cofnod data suggested that Himalayan balsam (*Impatiens glandulifera*) and Japanese rose (*Rosa rugosa*) were previously present within the Proposed Development Site, those neither were recorded during the 2019 EP1HS. The 2009 EP1HS also noted montbretia (*Crocodymia x crocosmiiflora*) and purple dewplant (*Diphysma crassifolium*) within the Proposed Development Site; however, these were not confirmed by the 2019 EP1HS.

New information on the baseline environment

At the time of writing, no new information on terrestrial ecology was available baseline environment since the 2020 ES was produced.

5.5.1.3 Identification of key issues

Identification of key issues within the 2020 ES

The key construction phase potential impacts include:

- Direct permanent habitat loss of woodland, scrub and grassland within the footprint of the Proposed Development;
- Potential disturbance, injury or mortality to protected species (bats and reptiles) during construction;
- Potential for other pollutants to enter terrestrial habitats (e.g. hydrocarbons from fuel oil or lubricants);
- Disturbance to mammals including bats and badger, and reptile species including slow worm and smooth lizard present in adjacent habitats through noise, lighting and human activity;
- Potential to facilitate dispersal of non-native invasive species; and,
- Overall effect on biodiversity.

The 2020 ES detailed mitigation measures for the above potential impacts and concluded that the residual effects for all potential impacts were not significant. As the updates to the design of the Proposed Development are within the envelope of what was assessed within the 2020 ES, no further assessment is considered necessary to inform the EIA.

The key operation phase potential impacts of the Proposed Development include:

- Avoidance of the Proposed Development area by foraging bats due to reduced habitat connectivity and increase in lighting; and,
- Potential to facilitate dispersal of non-native invasive species.

Additional key issues to those assessed in the 2020 ES

In order to meet the requirements of the Environment Wales Act 2016, satisfactory mitigation for any loss of biodiversity is required.

Due to the presence of non-native species, NRW require a Biosecurity Risk Assessment to be submitted detailing measures to control, remove or for the long-term management of invasive species both during construction and operation.

5.5.1.4 Approach to providing required information

In order to understand the Proposed Development's potential impact on habitat loss and overall biodiversity, a biodiversity assessment will be undertaken.

Following UK guidance published by CIEEM, it is considered that that ecological survey data and associated reports that are less than 18 months old are likely to be valid (CIEEM, 2019). Whilst the revised Proposed

Development includes The Greens, which was not included in the 2019 EP1HS, this area comprises amenity grassland of low ecological value. As such, no further surveys are considered necessary to inform the EIA.

5.5.2 Intertidal and Benthic Ecology

5.5.2.1 Introduction

This section presents an overview of the previous work presented within the 2020 ES in terms of intertidal and benthic ecology, provides new information on the baseline environment and identifies key issues arising from the revised Proposed Development. Finally, this section sets out the approach to providing the required information on intertidal and benthic ecology.

5.5.2.2 Previous work undertaken and new information on the baseline environment

Previous work undertaken

In order to characterise the intertidal and benthic ecology of the areas potentially affected by the Proposed Development, both directly and indirectly, it was agreed with NRW that available information presented within the 2010 ES would be suitable to inform the 2020 ES. A number of surveys were undertaken to inform the 2010 ES, including:

- An intertidal habitat mapping undertaken in October 2009;
- An intertidal infauna invertebrate sampling; undertaken in September to October 2009; and,
- A sublittoral habitat and biotope survey undertaken in September to October 2009.

In addition, the 2019 EP1HS surveyed the intertidal zone within the Proposed Development Site.

The following was identified:

- The sea-pen (*Virgularia mirabilis*), a characteristic species of the Mud in Deep Water Priority Habitat is present within the Proposed Development Site; however, NRW do not consider that the mud habitat present within New Harbour is a true representation of the priority habitat (**Appendix D4**).
- INNS, particularly carpet sea-squirt (*Didemnum vexillum*) are present within the Proposed Development Site. Following storm *Emma* in March 2018, there was concern that carpet sea squirt may have dispersed. However, surveys in October 2018 found no evidence of carpet sea-squirt outside the existing range within the former Holyhead Marina area.
- Littoral biotopes show relatively little change from previous survey data obtained in 1996 from Countryside Council for Wales (CCW). Changes included a shift in one area north of Soldier's Point from a mussel/barnacle-dominated biotope to a Furoid (brown algae)-dominated biotope. One biotope near Porth-y-Felin which had not been recorded in previous surveys was a fauna-dominated barnacle-limpet community. The invasive non-native Pacific oyster (*Magallana giga*) was recorded in this biotope.
- Sediment samples from muddy mixed sediment in the bay, east of Porth-y-Felin were dominated by three species of cirratulid polychaetes (bristleworms); the king ragworm (*Alitta virens*) was also present. The sediment samples from the shores of the former Holyhead Marina were of artificial origin consisting of a crushed angular limestone, and were dominated by the polychaete *Malacoceros fuliginosus*, a species characteristic of disturbed environments.
- The drop-down video survey found that hard substrate was present in the north, west and southern boundaries of the harbour. The diving survey confirmed that the reef areas were relatively species-

rich, with 50 algae and 48 epibenthic faunal species. The INNS carpet sea-squirt was not recorded in these surveys.

- The remainder of the harbour was a mud plain with little epifaunal life, apart from the dragonet fish (*Callionymus lyra*) and the common swimming crab (*Liocarcinus depurator*). The habitat also supported the slender sea-pen. The survey found these spread across the southern area of the harbour.
- Two priority habitats that have been historically present within the site; coastal saltmarsh and coastal vegetated shingle, were not observed during the EP1HS in July 2019. The Deep-Water Mud habitat is found in the southern half of harbour and extending to Salt Island in the east.

New information on the baseline environment

At the time of writing, no new information on intertidal and benthic ecology was available baseline environment since the 2020 ES was produced.

5.5.2.3 Identification of key issues

Key issues identified in the 2020 ES

Key issues relating to intertidal and benthic ecology that were considered within the 2020 ES included:

- Direct habitat loss within the footprint of the Proposed Development through reclamation of land and construction of the breakwater;
- Indirect impacts due to siltation to adjoining habitats within the harbour through reclamation of land; and,
- Increased risk of spread of the INNS species, carpet sea-squirt, due to availability of new substrate for colonisation, and increased movements of recreational crafts.

The 2020 ES concluded that effects to benthic ecology were of minor adverse significance; however, the potential impacts of the spread of INNS species was determined to be of major adverse significance. Detailed measures to mitigate for this were provided and the 2020 ES concluded that the residual effects were negligible and therefore not significant.

Additional key issues to those assessed in the 2020 ES

Key issues relating to intertidal and benthic ecology to those assessed in the 2020 ES include:

- Increased suspended sediment concentration and smothering of benthic habitats and species during dredging and disposal activities; and,
- Re-suspension and depositing of potentially contaminated sediment during dredging activities.

In addition, NRW have also advised (**Appendix D4**) that the littoral and sublittoral rock habitats within the footprint of the Proposed Development should be considered as Annex I rocky reef habitat.

NRW also advised that the justification of the assessment of negligible / not significant in relation to minimising the spread of INNS spread during construction/operation activities was limited.

5.5.2.4 Approach to providing required information

Intertidal walkover and subtidal video transect surveys will be undertaken to validate the previous surveys undertaken in 2009. Furthermore, additional subtidal transects will be carried out to determine the extent and condition of Annex 1 reef habitat within the footprint of the Proposed Development. A biosecurity risk assessment will be submitted that will include measures to control, remove or for the long-term management of INNS both during construction and operation for marine environments. The assessment will also be informed by the findings of the sediment analysis and PSA, and the results of the hydrodynamic modelling (see **Section 5.8**).

5.5.3 Ornithology

5.5.3.1 Introduction

This section provides a summary of the background information on ornithological receptors within the study area included within the 2020 ES. Ornithological issues considered in the 2020 ES are presented and the key issues arising from the proposed changes to the project design are identified. The approach to providing the required information on ornithological receptors is also set out.

Further information on potential adverse effects on the designation features of Anglesey Terns / Morwenoliaid Ynys Môn SPA and Holy Island Coast / Glannau Ynys Gybi SPA is outlined in **Section 7**.

5.5.3.2 Previous work undertaken and new information on the baseline environment

Previous work undertaken

A desk-based review of ornithological receptors in the study area was undertaken to inform the 2020 ES, which determined the following:

- The study area overlaps with a section of Chwarel Morglawdd Local Wildlife Site (LWS) (see **Figure 2.1**) which is designated for, in part, feeding and nesting area for birds including shelduck *Tadorna tadorna*, oystercatcher *Haematopus ostralegus*, ringed plover *Charadrius hiaticula* and red-breasted merganser *Mergus serrator*.
- During a breeding bird survey of the study area undertaken in March to June 2009 (Argus Ecology, 2009), eight of the 41 species recorded are listed under Section 7 of the EAW 2016: linnet *Carduelis cannabina*, ringed plover *Charadrius hiaticula*, herring gull *Larus argentatus*, house sparrow *Passer domesticus*, dunnock *Prunella modularis*, starling *Sturnus vulgaris*, song thrush *Turdus philomelos* and chough *Pyrrhocorax pyrrhocorax*.
- Of the species observed in the breeding bird survey, the only Annex I species recorded was chough (a feature of the Holy Island / Glannau Ynys Gybi SPA). Terns from the Anglesey Marine / Morwenoliaid Ynys Môn SPA were not observed in the study area.
- A Non-Estuarine Waterbird Survey of wintering waterbirds, undertaken in January 2016, recorded use of the study area by Annex I species including red-throated diver *Gavia stellata* and great northern diver *Gavia immer*, plus Section 7 species including black-headed gull *Chroicocephalus ridibundus* and herring gull.
- Although not recorded in the surveys, a regionally important population of black guillemot is known to nest in drainage holes in Holyhead Port and may therefore forage within the marina.

New information on the baseline environment

There have been no changes to SPA designations since the 2020 ES was produced. The 2019 EP1HS did not identify any major changes to the distribution of habitat types within the Proposed Development Site since the breeding bird survey was undertaken in 2009. The areas of broad-leaved woodland and dense scrub in the west of the Proposed Development Site were identified as optimal habitats for breeding birds. There have been no further Wetland Bird Survey (WeBS) counts since 1991.

5.5.3.3 Identification of key issues

Key issues identified in the 2020 ES

Key issues to ornithological receptors that were considered within the 2020 ES included:

- Site clearance affecting potential breeding bird habitat, including chough from the SPA;
- Disturbance of breeding or foraging birds, including protected species such as chough, during construction activities;
- Disturbance to birds through noise, lighting and human activity during operation.
- Disturbance of birds within the harbour due to increased vessel movements during operation of the marina; and,
- Increased recreational disturbance due to increased resident/visitor numbers.

The 2020 ES concluded that, with mitigation, potential impacts to breeding and wintering birds would be negligible and therefore not significant. It is considered that the changes to the Proposed Development would not affect the findings of the assessment presented in the 2020 ES and no further assessment is considered necessary.

Key issues identified since the 2020 ES

Key issues to ornithological receptors that have been identified since the 2020 ES are as follows:

- Potential impact on foraging coastal and marine birds due to temporary effects on the availability of prey resources during dredging and disposal activities.

5.5.3.4 Approach to providing required information

Effects on chough from the Holyhead Coast / Glannau Ynys Gybi SPA will be assessed in the HRA (**Section 7**). Given that the changes to the proposed work include the fact that development is no longer proposed at Soldier's Point and reclamation work along Newry Beach is reduced, the envelope of impacts in the 2020 ES is considered to form the worst case scenario in terms of impacts on terrestrial bird species, therefore the conclusions of the 2020 ES remain valid.

A desk-based review of the baseline information provided in the 2020 ES will be undertaken to determine the magnitude of potential impacts from the dredging and disposal operations on coastal and marine birds.

Information regarding the magnitude of potential impacts would be drawn from the assessment of effects of the dredging and disposal activities on marine prey species (see **Sections 5.5.2** and **5.5.4**).

5.5.4 Fish and shellfish resources

Fish and shellfish resources were not considered in the 2020 ES, so no previous assessment has been undertaken. This section provides a summary of the available information on fish and shellfish resources

within the study area, identifies key issues arising from the Proposed Development and describes the approach to providing the required information on fish and shellfish resources to inform the EIA.

Given the small scale of the disposal required at Holyhead North (anticipated to be up to 125,000m³), when compared with the quantity of material that is licensed to be disposed of at the site each year, there are expected to be no significant impacts on fish and shellfish resources at the site and will not be considered within the EIA.

5.5.4.1 Information on the baseline environment

Fish and shellfish resources off the coast of North Anglesey

In terms of commercial and recreational fishing resources within the New Harbour, there are stocks of lobster and crabs which are targeted, on a relatively minor scale, by fishermen deploying pots in the east of the harbour near to the leeward face of the Great Breakwater. Information on fish resources representative of the wider area has been gained from subtidal trawl surveys undertaken between 2010 and 2015 (Horizon Nuclear Power, 2016) in Holyhead Bay and along the north west coast of Anglesey. Trawl surveys recorded 75 taxa, the most abundant of which being dab *Limanda limanda*, small-spotted catshark *Scyliorhinus canicular*, plaice *Pleuronectes platessa*, sprat *Sprattus sprattus*, poor-cod *Trisopterus minutus* and common dragonet *Callionymus lyra*. Intertidal surveys were dominated by clupeids, sandeels *Ammodytidae* spp., sand smelt *Atherina presbyter*, plaice and gobies *Gobiidae* spp.

Spawning and nursery grounds

A spawning / nursery ground mapping project undertaken by Cefas in 2010 (Ellis *et al.*, 2010) defined high and low intensity spawning and nursery grounds of commercially and ecologically important species at a resolution of half an International Committee for the Exploration of the Sea (ICES) statistical rectangle. The study area, is located within the defined low intensity spawning and/or nursery grounds listed in **Table 5.5**, indicating that there may be some low intensity local spawning and nursery activity.

Table 5.5 Defined spawning and nursery grounds overlapping the study area (Ellis *et al.*, 2010)

Species		Spawning ground	Nursery ground
Cod	<i>Gadus morhua</i>	Low	-
Whiting	<i>Merlangius merlangus</i>	Low	Low
Mackerel	<i>Scomber scombrus</i>	Low	-
Plaice	<i>Pleuronectes platessa</i>	Low	-
Sole	<i>Solea solea</i>	Low	-
Sandeel	<i>Ammodytidae</i> spp.	Low	-
Anglerfish	<i>Lophius piscatorius</i>	-	Low
Spotted ray	<i>Raja montagui</i>	-	Low
Tope	<i>Galeorhinus galeus</i>	-	Low

Conservation and ecological interests

Fish species that are afforded some level of protection or conservation status and that have the potential to be present within the study area are presented in **Table 5.6**.

Table 5.6 Conservation / protection status of species that have the potential to occur in the study area

Protection / conservation status	Species
OSPAR list of threatened / declining species	Thornback ray, spotted ray, cod
IUCN Red List "near threatened" or "vulnerable"	Halibut, cod, haddock, tope, spurdog, bull huss, blonde ray, thornback ray
Bern Convention Appendix III species	Common goby, sand goby
EAW 2016, Section 7	Tope, thornback ray, blonde ray, herring, sole, cod, anglerfish, whiting, plaice, mackerel, scad, Raitt's sandeel

In addition, butterflyfish *Pholis gunnellus* and sandeel species are important prey species for coastal and marine birds and commercial fish and were abundant in the surveys (Horizon Nuclear Power, 2016).

5.5.4.2 Identification of key issues

It is important to note the fact that the marine construction works will take place within the confines of a partially enclosed harbour area, hence there are considered to be no significant risks to the wider fish and shellfish populations around Holyhead and further afield, including across the Anglesey Terns / Morwenoliaid Ynys Môn SPA and North Anglesey Marine / Gogledd Môn Forol SAC. Sediment plumes during capital dredging would not be expected to disperse significantly beyond the extent of the harbour. As such, the key issues listed below are those that may affect resources within the Holyhead New Harbour, such as lobster, crabs and other finfish and shellfish species targeted by recreational and commercial fishing operators:

- Increased suspended sediment concentrations (SSC), water quality deterioration and sedimentation within Holyhead New Harbour during land reclamation and dredging activities; and,
- Habitat alteration as a result of changes to hydrodynamic and sedimentary processes.

Information regarding the potential impacts of the Proposed Development on fish and shellfish resources within the New Harbour will be drawn from the assessment of effects on coastal hydrodynamic/sedimentary processes (see **Section 5.1.3** and marine water quality (see **Section 5.8.3**).

5.5.4.3 Approach to providing required information

Sediment sampling within the proposed dredge area will be undertaken and analysed for chemical contaminants and PSA. The results will be used to assess the potential impacts of contaminant release and the magnitude of sediment dispersion and settlement, and how this would relate to fish and shellfish resources within the New Harbour (see also **Section 5.8**).

Hydrodynamic modelling (tidal flow and wave) will be undertaken to predict changes to the hydrodynamic regime within Holyhead New Harbour once the Proposed Development is operational. The output from the modelling will be used to assess the potential impacts of such changes to supporting habitat for fish and shellfish resources (see also **Section 5.1**).

5.5.5 Marine Mammals

5.5.5.1 Introduction

This section provides a summary of the work undertaken within the 2020 ES in terms of marine mammal receptors and highlights new available information on the baseline environment within the study area. Marine mammal issues considered in the 2020 ES are summarised and the new key issues arising from the revised Proposed Development are identified. The approach to providing the required information on marine

mammal receptors is also set out. Further information on potential designated features and the supporting habitat of Gogledd Môn Forol / North Anglesey Marine SAC is outlined in **Section 7**.

5.5.5.2 Previous work undertaken and new information on the baseline environment

Previous work undertaken

A desktop review of species present in the area was undertaken for the 2020 ES. It identified harbour porpoise (*Phocoena phocoena*), bottlenose dolphin (*Tursiops truncatus*) and grey seal (*Halichoerus grypus*). Other species that could potentially occur within the area include common dolphin (*Delphinus delphis*), Risso's dolphin (*Grampus griseus*), minke whale (*Balaenoptera acutorostrata*) and harbour seal (*Phoca vitulina*).

Population densities were provided for harbour porpoise using the latest SCANS III (Small Cetacean Abundance in the North Sea) data. Bottlenose dolphin are predominantly recorded off the north and east coasts of Anglesey and the Proposed Development itself is not of interest for this species. There is a breeding site for grey seals 2.5km west of the Proposed Development and only occasional use of the area. The 2020 ES concluded that marine mammals are not considered to be present within the harbour itself.

New information on the baseline environment

At the time of writing, no new information on marine mammals was available baseline environment since the 2020 ES was produced.

5.5.5.3 Identification of key issues

Key issues identified in the 2020 ES

There were no key issues relating to marine mammals from the construction phase of the works. During the operational phase the following were identified:

- Increased disturbance to marine mammals as a consequence of increased boat traffic.

As the Proposed Development is within the North Anglesey Marine/Gogledd Môn Forol SAC, there could be disturbance impacts on this species and consequently the conservation objectives of the SAC, particularly if there is a significant increase in boat traffic and/or unregulated viewing of marine mammals as a consequence of the Proposed Development. However, the 2020 ES concluded that, with mitigation, impacts to marine mammals during construction and operation of the marina would be negligible or not significant. It is considered that the changes to the Proposed Development, i.e. the reduction of the marina from 500 to 250 berths, would present an improvement on the findings presented in the 2020 ES and no further assessment is considered necessary.

Key issues identified since the 2020 ES

Further to the 2020 ES, the following key issues have been highlighted for the construction phase:

- Underwater noise from construction vessels and dredging, and reclamation;
- Increased collision risk with construction vessels;
- Potential changes in prey availability due to increased suspended sediment and risk from contaminants during the dredge and disposal activities; and

- Potential changes in prey availability due to smothering of habitats as a result of the deposition of the dredge and disposal plume.

5.5.5.4 Approach to providing required information

It is considered that there is sufficient existing information from surveys and monitoring programs for marine mammals within the area to assess the potential impacts. As such, further surveys are not considered necessary.

To fully assess the potential impacts of underwater noise, a desktop review of noise impact levels from the activities will be undertaken. The potential impacts from increased vessel numbers will be fully assessed as part of the EIA process for construction and operation; the changes to prey availability will be informed by the benthic ecology survey (see **Section 5.5.2**), the assessment of fish and shellfish resource (see **Section 5.5.4**) and the assessment of changes in water quality (see **Section 5.8**).

5.6 Commercial and Recreational Fisheries

5.6.1 Introduction

This section provides a summary of baseline information currently available in terms of commercial, chartered and recreational fishing activity within the study area. Key issues arising from the revised Proposed Development that will require consideration in the EIA are identified and the approach to providing any further information required is set out. The 2020 ES did not consider commercial and recreational fisheries.

Significant disruption or displacement of fishing activity (temporary or otherwise) posed by vessels involved with disposal operations at Holyhead North is not anticipated given the relatively small volume of material (anticipated to be up to 125,000m³) that may need to be disposed of during the construction phase, therefore it will not be considered within the assessment.

5.6.2 Information on the baseline environment

5.6.2.1 Fisheries landings data at Holyhead Port

Holyhead Port is one of the most active ports for the Welsh fishing fleet (Pantin *et al.*, 2015). The most recently available data on fisheries landings at the port are provided by the UK Sea Fisheries Statistics 2018 report (MMO, 2019), which presents landings data from 2014 to 2018. During this period, reported landings at Holyhead by UK and foreign vessels were valued annually between c.£2.0 million and c.£3.1 million. In 2018, the value of reported landings was c.£2.1 million, forming c.10% of all reported Welsh landings. **Table 5.7** demonstrates how this relates to other key fisheries ports in Wales (i.e. those with 2018 total landings value greater than £1.0 million).

Table 5.7 Value of 2018 landings ('000 £) at key Welsh fisheries ports by UK and foreign vessels (MMO, 2019)

Port	2018 landings value	% of 2018 total Welsh landings value
Milford Haven	9,647	44
Fishguard	2,134	10
Holyhead	2,112	10
Swansea	1,444	7
Saundersfoot	1,049	5

Landings into Holyhead Port are dominated by shellfish species; between 2014 and 2018 shellfish have made up 98-99% of the annual landings by both weight and overall value.

Fishing vessels operating from Holyhead Port

During 2019, the UK fishing fleet register (MMO, 2019) indicated that a maximum of 22 commercial fishing vessels 10m or less in length were registered to Holyhead Port at any one time, and just a single vessel over 10m in length. This suggests that the fishing fleet based at Holyhead is dominated by smaller vessels that are likely to fish closer to the coast, and rarely fish for more than 24 hours in a single trip. However, over 80% of reported landings at Holyhead Port are from over-10m vessels, which may in part be due to under-reporting by the smaller vessels but may also in part be due to a number of large vessels registered elsewhere unloading catches at Holyhead.

Fisheries landings data from ICES rectangle 35E5

The marine study area for the Proposed Development, including potential disposal at Holyhead North disposal site, lies within ICES statistical rectangle 35E5. The most recently available data on fisheries landings by UK vessels from 35E5 are provided by the UK Sea Fisheries Statistics 2018 (MMO, 2019).

The value of reported landings by UK vessels from 35E5 between 2014 and 2018 was c.£1.4 million to c.£1.9 million each year; in 2018, the total value of reported landings value was c.£1.7 million. Every year reported landings from 35E5 are dominated by shellfish species (in 2018, shellfish species constituted over 99% of total landings). **Table 5.8** demonstrates the reported landings of key shellfish species from 35E5 during the period 2014 and 2018.

Table 5.8 Value of 2014 – 2018 landings ('000 £), of key shellfish species from ICES rectangle 35E5 by UK vessels (MMO, 2019)

Species	2018	2017	2016	2015	2014
Whelks	1,684	1,385	1,254	860	805
Scallops	308	245	225	389	349
Lobster	247	226	216	233	235
Prawns	30	28	17	16	<1
Crabs	4	2	3	6	8
Other	-	<1	-	2	<1

Fishing activity within Holyhead New Harbour

There is some small-scale potting activity for lobster and crabs within the New Harbour, notably along the eastern side of the harbour near the leeward face of the Great Breakwater. However, most fishing activity takes place outside the New Harbour, where most of the marine elements of the Proposed Development would be confined. However, fishing vessels may be berthed / moored within the New Harbour and, if so, would transit back and forth during trips to fishing grounds outside the study area. Recreational angling is popular from Holyhead Breakwater, both seaward and leeward, targeting a range of demersal and pelagic finfish species.

5.6.3 Identification of key issues

Potential impacts to commercial and recreational fisheries during the construction phase of the Proposed Development are as follows:

- Impacts on commercial and recreational fishing activities/landings due to disruption during construction works (considered in **Section 5.5.4.3**);
- Impacts on commercial and recreational fishing activities/landings within the New Harbour due to impacts on fish stocks during the construction works.

Potential impacts during the operation phase of the Proposed Development are as follows:

- Impacts on commercial and recreational fishing activities/landings due to the increased number of vessels within the new marina.

5.6.4 Approach to providing required information

The key issues outlined above relate to the ability of fishing vessels to navigate within the marina and wider areas and the impacts of construction activities on stocks of lobster, crabs and other resources targeted within the New Harbour. The findings of the assessments on commercial and recreational navigation (see **Section 5.10**) and fish and shellfish resources (see **Section 5.5.4**) will address these issues, respectively. **As such, it is proposed that impacts specifically on commercial and recreational fisheries are scoped out of further assessment.**

5.7 Ground and Geo-environmental Conditions

5.7.1 Introduction

This section provides a summary of baseline information currently available in terms of Ground and Geo-environmental Conditions within the study area. Key issues arising from the revised Proposed Development that will require consideration in the EIA are identified and the approach to providing any further information required is set out.

5.7.2 Previous work undertaken and new information on the baseline environment

The Ground and Geo-environmental Conditions chapter of the 2020 ES identified the existing soil and geological conditions and development constraints, evaluated the potential for contamination and assessed the potential effects on ground conditions during both the construction and operational phases.

The chapter described the methods used to assess the potential impacts, the baseline conditions currently existing at the site and surroundings, the potential direct and indirect impacts of the Proposed Development arising from changes in topography, ground contamination, ground gas regime and the potential for re-use of soils, the mitigation measures required to prevent, reduce, or offset the impacts and the residual impacts.

The chapter was supported by the following documents/works:

- Preliminary Ground Investigation Report produced by Tier Environmental Limited (Report Ref. TE1115GIR v1.1 dated 15th July 2019) presented in Appendix 11-1;
- Geo-Environmental and Geotechnical Desk Study Report (Report Ref. 121496-0300 dated May 2010) produced by Black and Veatch Ltd (see Appendix 11-2); and,
- A geophysical survey of the seaward component of the site has also been carried out to determine the thickness of superficial deposits over the area of the proposed marina and the level at which bedrock is likely to be encountered. This is presented in the Engineering Study report produced by Black and Veatch (Report Ref. 121496 dated September 2010) presented in Appendix 11-3.

There are no changes to these sources of information that would be required to inform the EIA.

There are also no significant changes to the legislation and guidance that were referred to in the 2020 ES; therefore, no revisions or update to the approach and methodology are required. The land contamination assessment was undertaken in accordance with the Environment Agency 'Model Procedures for the Management of Land Contamination Guidance (CLR11) (2004)', which will soon be withdrawn and replaced by 'Land Contamination: Risk Management'⁷. Both documents provide an assessment of the potential risk to relevant receptors via the identification and subsequent iterative assessment of pollutant linkages therefore there would be no significant change to the findings and conclusions.

⁷ <https://www.gov.uk/guidance/land-contamination-how-to-manage-the-risks>

The 2020 ES identified the following within the Proposed Development Site:

Ground conditions

- Historic land uses across the Proposed Development Site include Soldier's Point, Government House, storage tanks, railway tracks/sidings, Porth-y-felin farm (subsequently the Boathouse Hotel), the Beach Yard Timber Yard, a water pumping station and a lifeboat station;
- Made Ground was encountered across the site to depths of between 0.05m and 2.10m bgl. The Made Ground was generally recovered as sands and gravels with anthropogenic materials including brick, ceramic, concrete, metal, rope, plastic, glass, wood, ash and clinker;
- Drift deposits on site were reported as Devensian Till;
- Bedrock on the Proposed Development Site was recovered from depths between 0.05m and 3.79m bgl. The bedrock appears to extend under the area proposed for marina development where it is indicated to be less than 3m below the seabed; and,
- The superficial deposits and bedrock underlying the site are classified as Non-Aquifers. Groundwater was not recorded in the majority of the monitoring wells, although there is some evidence of localised perched groundwater being present.

Hydrogeology

- Superficial deposits (Till) in the vicinity of the site are classified as Secondary Aquifer – undifferentiated layers and that the solid geology (New Harbour Group) is classed as a Secondary (B) Aquifer. The New Harbour Group is therefore generally regarded as containing insignificant quantities of groundwater; and,
- There are no licensed groundwater abstractions or source protection zones within the vicinity of the site as listed in the Groundsure Report.

Hydrology

- Several minor surface water features were identified within the assessment area, including two small streams in the central area of the site that discharge into the harbour. There is no published water quality data available for any watercourses in the vicinity of the site;
- There are 9 No. discharge consents listed within the study area, with the only active consents associated with Porth y Felin Pumping Station for sewage discharges; and,
- There are no licensed surface water abstractions listed in the Groundsure Report.

Environmental Database

- There is a historical landfill, known as Soldiers Point Landfill, is located approximately 10m to the southwest, to the south of Beach Road. The course of Porth-y-Felin Stream appears to traverse this historic landfill. The landfill is reported to have received industrial and household waste during the late 1960s and early 1970s, with the licence surrendered in 1988. A site walkover previously undertaken by Black and Veatch confirmed the existence of a leachate collection chamber present within the footprint of the landfill.

Contamination

- It was considered that the Made Ground within the Proposed Development area may present a potential risk to end users with respect to polyaromatic hydrocarbons (PAHs) within the western area. It was recommended that further investigation is required in order to determine the need for a clean cover system across the western site area, and thus delineate areas whereby clean cover may be required in order to break the pathway between source and receptor;
- A sample of asbestos cement sheeting from Soldiers Point House was found to contain asbestos chrysotile fibres. It is considered that from a human health perspective that the likelihood of asbestos containing materials in the localised vicinity of Soldiers Point House may represent an unacceptable risk. Areas of asbestos roofing and cladding were also identified during the ground investigation works; and,
- Within the eastern area, a localised hotspot of arsenic and lead was identified. Slightly elevated concentrations of leachable metals were recorded during the ground investigation. It was considered that the reported leachate concentrations reported are not representative of a significant risk to controlled waters.

Ground Gas

- The majority of the development site was classified as Characteristic Situation 1 – Very Low Risk, for which gas protection measures would not be required. Localised areas of the site were classified as Characteristic Situation 2 (Low Risk) for which basic gas protection measures may be required.

Drainage

- It is considered that soakaways are unlikely to be suitable across the majority of the site due to the anticipated low permeability of the shallow soils/bedrock.

5.7.3 Identification of key issues

No significant residual effects would remain following the implementation of all mitigation stated in the 2020 ES during the Construction Phase.

The implementation of additional measures to mitigate the potential contaminant linkages which could exist between the existing shallow soils and groundwater, ground gas and ground stability and the end users will result in no significant residual effects remaining within the Completed Development.

Whilst a sizeable proportion of the identified potential contaminative sources are considered to be of relatively low risk based on the findings of the preliminary ground investigation, there are a number which should be investigated further and also improve the density of chemical testing. The additional ground investigation works will ensure that the potential risks are adequately assessed and any required mitigation measures are put in place to minimise risks to end users and the environment.

The changes in the design of the Proposed Development would not be expected to result in any significant changes to the previous conclusions.

5.7.4 Approach to providing required information

Any additional information provided by the regulatory authorities and/or additional ground investigation works will be reviewed to confirm the baseline conditions and to revise the assessment and mitigation measures, if considered appropriate.

Additional intrusive ground investigation works, laboratory testing and qualitative (and quantitative if deemed necessary) risk assessments are required to confirm the conclusions determined from the previous preliminary investigations.

It was considered that additional gas monitoring be undertaken in the vicinity of monitoring locations whereby elevated carbon dioxide, carbon monoxide and flow rates have been reported in order to confirm whether these areas of the site require ground gas protection measures and to delineate those areas whereby the Proposed Development Site would be classified as CS2.

Additional ground investigation works will be undertaken for the detailed design of the Proposed Development. A Remediation Strategy and a Gas Verification Plan (if required) will also be produced based on the findings of the ground investigation works, controlled waters and human health risk assessments and any discussions held with NRW and the IoACC.

5.8 Water Quality, Surface Waters and Flood Risk

5.8.1 Introduction

This section presents an overview of the previous work undertaken within the 2020 ES in terms of water quality, surface waters and flood risk, provides information on the baseline environment and then identifies key issues arising from the revised Proposed Development. Finally, this section sets out the approach to providing the required information on water quality, surface waters and flood risk.

5.8.2 Previous work undertaken and new information on the baseline environment

5.8.2.1 Previous work undertaken

A desk-based review of terrestrial surface waters, marine water quality and flood risk issues was undertaken to inform the 2020 ES. The following information was identified:

- Terrestrial surface water bodies on the island of Holyhead comprise small streams, drainage ditches and one watercourse that is designated as a main river by NRW: Porth-y-Felin stream, which dissects the Proposed Development Site and enters the sea adjacent to the slipway. The stream is too small to have been designated as a river water body in its own right (i.e. it has a catchment area of less than 5km²). As this is not included in the River Basin Management Plan, there are no surface water quality records available from NRW in the immediate area of the Proposed Development Site.
- The Proposed Development is located within the Holyhead Bay coastal water body. According to the NRW's Cycle 2 Rivers and Water Bodies Viewer, this water body has a current Overall Status of Moderate, an Ecological Status of Moderate and a Chemical Status of Fail due to levels of fluoranthene, benzo(a)pyrene and mercury and its compounds.
- The spring tidal prism (the volume difference between high water spring and low water spring excluding any contribution from freshwater inflow) for the Proposed Development Site is 5.9Mm³. The neap tidal prism is 2.9Mm³.
- The Proposed Development Site is underlain by the Ynys Môn groundwater body. According to the NRW's Cycle 2 Rivers and water bodies viewer, this holds good quantitative status but poor chemical status due to the chemical Groundwater Dependent Terrestrial Ecosystem (GWDTE) test, which means that the overall status is poor. The bedrock is the metamorphic New Harbour Group and is overlain in places by superficial deposits of Devensian till originating in the glacial Quaternary Period. This groundwater body is a Secondary B aquifer and is considered to have high vulnerability and therefore may easily transmit pollution to groundwater.
- The Proposed Development Site is partly situated in an area currently designated as Flood Zone C2 (an area of floodplain without significant flood defence infrastructure) according to the Flood Consequence Assessment (Royal HaskoningDHV, 2020) with the main risk of flooding coming from surface water flows from outside the Proposed Development area.

5.8.2.2 New information on the baseline environment

NRW are currently in the process of updating their flood maps and advice service, for which there is no deadline for completion and as such there will be no changes to the baseline information presented in the Flood Consequences Assessment (FCA) in the 2020 ES.

The findings of the chemical analysis of the sediment samples collected within the footprint of the Proposed Development are presented in **Appendix E** and compared with Cefas Action Levels. Whilst a number of exceedances of Action Level 1 were recorded, these were all marginal and the material to be dredged is considered suitable for offshore disposal at the Holyhead North IS043 disposal site.

5.8.3 Identification of key issues

5.8.3.1 Key issues identified in the 2020 ES

The following key issues relating to water quality, surface water and flood risk that were considered within the 2020 ES:

- Contamination of surface freshwater quality through accidental release of fuel, oil or contaminants;
- Contamination of marine water through the resuspension of contamination sediment during piling and rock placement;
- Contamination of groundwater as a result of groundworks;
- Contamination during operation of the Proposed Development arising from marina discharges and surface water runoff and foul effluent; and,
- Increased flood risk.

It is considered that the changes to the Proposed Development would not affecting the findings of the assessment presented in the 2020 ES and no further assessment is considered necessary.

5.8.3.2 Key issues identified since the 2020 ES

The following key issue relating to water quality, surface waters and flood risk was not considered within the 2020 ES as it was assumed that dredging was not required:

- Contamination of marine water and sediment quality through dredging and disposal activities during construction.

5.8.4 Approach to providing required information

Sediment sampling within the proposed dredge footprints has been undertaken and analysed as described in **Section 4.3**, with the results presented in **Appendix E**. This information will be used to assess the potential impacts on water and sediment quality. In addition, the results of the numerical modelling work will be used to determine the extent of the impact of sediment deposition, increase suspended sediment concentrations and any operational impacts to water quality through the presence of the new breakwater and marina structures.

The FCA will be updated to reflect the new design of the Proposed Development.

5.9 Noise and Vibration

5.9.1 Introduction

This section presents an overview of the previous work undertaken within the 2020 ES in terms of noise and vibration, provides information on the baseline environment and then identifies key issues arising from the revised Proposed Development. Finally, this section sets out the approach to providing the required information on noise and vibration.

5.9.2 Previous work undertaken and new information on the baseline environment

For the 2010 ES a baseline noise survey was undertaken at two positions relative to nearest sensitive receptors to the Proposed Development carried out over a weekday and weekend period to establish background and residual sound levels. The baseline noise survey was repeated at similar locations in March 2019 over a weekday and weekend period and therefore the background and residual sound levels remain valid to inform the EIA.

5.9.3 Identification of key issues

The proposed changes to the layout include the introduction of a new 'Winter layup' boat storage area adjacent to the Boathouse Hotel and would be formed from compacted stone. This would therefore be included in the construction and operational noise section of the ES.

The changes in guidance and standards include an update in 2019 to BS4142 (albeit mainly text and further clarification of the standard) and the (Design Manual for Roads and Bridges) DMRB guidance for noise and vibration (i.e. LA111 guidance). This will involve updating the semantic tables of impact, but these changes would not affect the conclusions reached in the 2020 ES.

The proposed changes listed in **Section 1.2.2** are likely to result in no change or slight improvement in effects due to the fact that they are removing or reducing the extent of the Proposed Development and area of new receptors.

5.9.4 Approach to providing required information

In order to provide the information required to update the assessment the following will be undertaken:

- The latest policies, guidance and standards for noise and vibration would be checked against the 2020 ES assumptions and updated accordingly;
- The assessment of the Proposed Development construction and operational activities would be re-calculated as appropriate, as a result of the changes to the site layout;
- Any changes to the impact assessment methodology would update any resultant update and change to noise and vibration levels;
- The introduction of the 'Winter layup' boat parking area would be included in the assessment of impacts and where appropriate mitigation measures updated; and,
- Whilst the DMRB impact guidance has been updated, the impact magnitude methodology has remained unchanged and therefore any changes in road traffic noise relative to the most recent assessment would not alter and therefore no additional calculations would be necessary.

5.10 Commercial and Recreational Navigation

5.10.1 Introduction

This section provides a summary of baseline information currently available in terms of commercial, recreational navigation within the study area. Key issues arising from the revised Proposed Development that will require consideration in the EIA are identified and the approach to providing any further information required is set out. The 2020 ES did not consider commercial and recreational navigation.

5.10.2 Information on the baseline environment

The Proposed Development is situated within Holyhead Harbour protected to the west by Holyhead Breakwater and to the east by Salt Island and Holyhead Port.

Holyhead Port

Holyhead Port, owned and operated by Stena Line Ports Ltd, forms the principal link for surface transport from north Wales and central and northern England to Ireland. Holyhead Port is the second busiest Ro-Ro (roll on-roll off) ferry port in the UK and is the third busiest in Wales in terms of tonnage handled. As a result, the Port is responsible for the direct employment of 25% of the local workforce.

The Port also supports a significant passenger ferry link with Ireland and handles, on average, approximately 470,000 passenger cars, motorcycles and buses every year. Annually, there are approximately 8,000 conventional and fast ferry movements (Ferryonline, 2018). This equates to approximately two million passengers each year. As a result, Holyhead Port is the busiest ferry port in Wales.

The port also supports a flourishing cruise industry, contributing more than £2.4m to the Welsh economy annually and helping to spread the word around the globe about the attractions of Wales. In 2018 Holyhead received 55 ships including Royal Caribbean's Brilliance of the Seas⁸ and this number is expected to increase.

Fishing Fleet

Holyhead Port also contains Fish Quay which services a fleet of small fishing vessels. Recreational fishing vessels and small workboats also use the harbour.

The fishing industry at Holyhead landed £2 million worth of fish in 2017 (MMO, 2019). Catches are landed year-round, with the majority of landings occurring during Spring and Autumn (MMO, 2019) (see **Section 5.6** for more information).

Recreational Navigation

Holyhead Sailing Club resides in the adjacent boatyard and has over 600 members and had moorings for up to 170 boats at the Marina (Holyhead Marina, 2018) prior to the events of Storm Emma. The Sailing Club holds regular sailing and social events, cruises, racing for dinghies, squibs and yachts. The Sailing Club has swinging moorings with a launch service manned daily throughout the season. Holyhead Harbour is ideal for cruising to locations in Ireland, the Isle of Man and Scotland.

⁸ <https://www.telegraph.co.uk/travel/cruises/port-guides/holyhead-cruise-port-guide/>

Figure 5.2 shows that approximately 60% of vessel movements in the past 30 days were passenger vessels, approximately 12% sailing vessels and approximately 7% special craft. Tankers and fishing vessels make up 10% of vessel movements⁷.

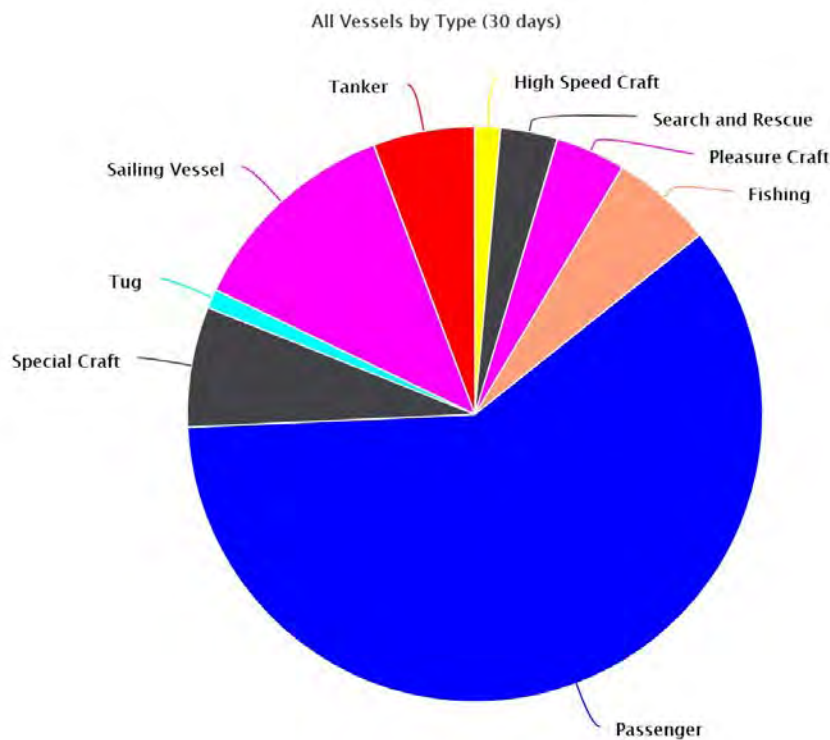


Figure 5.2 Proportion of vessel movements at Holyhead Port by type of vessel over the past 30 days (July-August 2020)⁹

5.10.3 Identification of key issues

Potential impacts to commercial and recreational navigation during the construction phase of the Proposed Development include:

- Extended transiting time for vessels leaving/approaching the Port; and,
- Impacts on navigational safety due to the presence of construction vessels and equipment within the harbour.

Potential impacts to commercial and recreational navigation during the operational phase of the Proposed Development include:

- Extended transiting time for vessels leaving/approaching the Port; and,
- Impacts on navigational safety due to an increase in the number of recreational vessels.

5.10.4 Approach to providing required information

A Navigational Study will be undertaken and used to inform the EIA. The assessment will be informed through consultation with the Port of Holyhead Harbour Master and other key stakeholders.

⁹ https://www.marinetraffic.com/en/ais/details/ports/431/United_Kingdom_port:HOLYHEAD

5.11 Archaeology and Heritage

5.11.1 Introduction

This section presents an overview of the previous work undertaken on archaeology and cultural heritage within the 2020 ES. It then summarises the anticipated potential effects of the Proposed Development followed by a description of the proposed approach to providing further required information.

5.11.2 Previous work undertaken and new information on the baseline environment

5.11.2.1 Previous work undertaken

A Desk-based Assessment (DBA) was undertaken in 2010 which considered the potential impacts on the archaeology and heritage which could be attributed to the Proposed Development. In 2019, the legislation and baseline data were updated to provide a new assessment of potential impacts that informed the 2020 ES. In summary, the 2020 ES predicted the significance of direct impacts of the Proposed Development, through a range of ground-disturbing works, and indirect impacts upon the setting of heritage assets would range from neutral (no change) through to major adverse.

A sidescan sonar survey was undertaken in 2010, which did not identify any features of archaeological interest, which may be the result of remains having become buried beneath surface sediments, or may reflect an absence of *in situ* material associated with previous disturbance associated with historic dredging campaigns.

5.11.2.2 New information on the baseline environment

No new information was available on archaeology and heritage to that presented in the 2020 ES.

5.11.3 Identification of key issues

Known archaeological remains and built heritage within a 1.5 km radius of a new study area will be researched in order to identify likely potential for further archaeology.

The Proposed Development could have a direct impact on the cultural heritage resource through a variety of ground-disturbing works, such as enabling works (construction of contractor's compounds, access roads, parking areas, storage areas, borrow pits and associated services). Landscaping and terracing works, surface stripping and levelling, construction of roads and infrastructure, foundations excavations for the turbines and associated buildings and service installation amongst others. Any of these activities could potentially expose, damage or destroy cultural heritage assets.

The Proposed Development also has the potential to generate indirect (visual) impact on cultural heritage assets, such as altering the visual setting or tranquillity of the sites and landscapes. Views to or from an asset can play an important part in defining setting, but the way in which a cultural heritage asset is experienced in its setting is also influenced by other environmental factors such as: noise, dust and vibration; by spatial associations; and by an understanding of the historic relationship between places.

The direct and indirect impacts, along with the proposed mitigation, are likely to remain unaltered from the 2020 ES; however, impacts and mitigation discussing Holyhead Breakwater and the Lighthouse are likely to be altered, and there is potential for a reduction in the impacts and mitigation for these assets.

Further studies of an updated Historic Environment Record (HER) enquiry will be needed to understand the potential impacts and mitigation required for any non-designated asset.

Direct, physical impacts to archaeology and heritage, if present below mean high water within the footprint of the Proposed Development, may occur during the following activities:

- Placement of material for reclamation (i.e. loss of archaeological material below/within body of infill, direct damage to archaeological material from physical placement of material on top);
- Physical damage to archaeological material on the seabed from placement of vessel anchors/jack-up feet during importation/storage of materials and construction activities;
- Seabed clearance (dredging) in advance of breakwater construction/placement of materials to construct breakwater;
- Physical disturbance of subsurface deposits from vertical steel restraining piles; and,
- Physical damage to material within the footprint of vertical steel restraining piles.

5.11.4 Approach to providing required information

As discussed above, any potential impacts as a result of the alterations to the boundary of the Proposed Development may not be considerable, but they will need to be discussed further. Ultimately, some of the potential impacts and the proposed mitigation are likely to be reduced due, in turn, by the reduction of the Proposed Development.

A new HER enquiry will be made to consider the revised Proposed Development boundary and the time lapse between the submission of the previous enquiry, with the potential for new sites to be added to the data.

In assessing the potential impact of the changes in the Proposed Development on terrestrial archaeology and cultural heritage, the assessment will consider the following:

1. The nature, extent and degree of survival of archaeological sites, structures, deposits and landscapes within the study area. It will involve the following areas of research:
 - a. Collation and assessment of all relevant information held in the regional HER at Gwynedd Archaeological Trust (GAT) in Bangor and records held by the Royal Commission on the Ancient and Historical Monuments of Wales (RCAHMW), within the development area and within 1.5km from the edge of the Proposed Development area;
 - b. Collation and basic assessment of the impact on all Designated archaeological sites (Scheduled Monuments, Listed Buildings, Historic Parks & Gardens, landscapes, Conservation Areas) within 1.5km from the edge of the Proposed Development area;
 - c. Assessment of all available excavation report and archives including unpublished and unprocessed material affecting the site and its setting;
 - d. Assessment of all extant aerial photographic (AP) evidence. This will include information held be the Central Register of Air Photography for Wales, in Cardiff;
 - e. Assessment of archive records held at the County Archives, and as appropriate, site files held by RCAHMW;
 - f. Records held by the developer e.g. bore logs, geological/geomorphological information, aerial photographs, maps, plans;
 - g. Map regression analysis using all relevant cartographic sources e.g. All editions of the Ordnance Survey County Series, Tithe and early estate maps (as available);

- h. Place name evidence;
 - i. Internet sourced satellite imagery and Lidar imagery as available;
 - j. Assessment of the records held at the Portable Antiquities Scheme; and,
 - k. Historic documents (e.g. Charters, registers, estate papers).
2. The significance/value of any remains in their context both regionally and nationally and in light of the findings of the desk-based study;
 3. The history of the site based on the areas of research outlined above;
 4. The potential impact and the significance of said impact of any Proposed Development directly or on the setting of known sites of archaeological importance;
 5. The potential for further archaeological remains to be present, which have not been identified in pre-existing archaeological records; and,
 6. The potential for further work, with recommendations if requested and where appropriate for a suitable investigative and/or mitigation methodology.

To further inform the assessment of maritime archaeology and heritage additional data and information will be obtained, including:

- Further review of maritime data held by the RCAHMMW and historic dredging data;
- A video transect survey to characterise the subtidal seabed; and,
- Consideration of the potential for indirect impacts associated with any identified changes to hydrodynamics and sedimentation (**Section 5.1**) following:
 - o Seabed sediment sampling within the proposed dredge footprints with samples sent for PSA; and,
 - o Hydrodynamic, wave transformation and wave penetration modelling to support design of the Proposed Development, which can also be used to support the assessment.

5.12 Socio-economic effects

5.12.1 Introduction

This section presents an overview of the previous work undertaken within the 2020 ES in terms of socio-economic effects, provides information on the baseline environment and then identifies key issues arising from the revised Proposed Development. Finally, this section sets out the approach to providing the required information on socio-economic effects.

5.12.2 Previous work undertaken and new information on the baseline environment

The previous assessment considered key socio-economic effects on the basis of guidance issued by Homes England (formerly the Homes & Communities Agency) including the Employment Densities Guide and the Additionality Guide. The underlying principle was to derive the 'net additional' effects of the Proposed Development over and above what would happen anyway if it did not go ahead and establish the magnitude and longevity of effects at the local and local authority level.

The overall effects (taking account of mitigation) were considered to be:

- Construction employment – 675 person years of net additional employment assessed as being of medium/moderate beneficial, short-term, local and district significance.
- Employment and Gross Value Added (GVA) – 179 net additional jobs and £6.2m net additional GVA per annum assessed as being of moderate beneficial, long-term, local and district level significance.
- Local fiscal effects - £0.4m per annum additional business rates and £0.4m in additional Council Tax per annum assessed as being of medium/moderate beneficial, long-term, local and district significance.
- Household expenditure - £3.4m of total additional household expenditure per annum assessed as being medium/moderate beneficial, long-term, local and district significance.
- Healthcare capacity – an increased residential population of 517 people, assessed as having a negligible adverse, long-term, local significance on GP provision but of potential medium/moderate adverse significance in terms of NHS dental provision based on shortages at that time.
- School places – 17 additional pupils of primary school age and 15 of secondary school age were assessed as being of low/minor adverse, long-term, local significance in terms of adding marginally to an existing deficit and reducing a low surplus in places respectively.

Baseline socio-economic conditions were assessed in order to provide a basis against which effects could be judged. This was broadly-based, including population, GVA, employment, unemployment and worklessness, job density, productivity, commuting flows, economic activity rates, business demography, earnings, qualifications, occupations, housing stock, deprivation, capacity of primary healthcare services and schools, and the visitor economy. Data was drawn from a range of national statistics, the majority of which will have more recent information available and are subject to the implications of Covid-19 and the effects on the economy against which to judge the significance of the Proposed Development.

5.12.3 Identification of key issues

The reduced extent of the Proposed Development represents the key issue in its assessment. The extent of development is significantly reduced, as summarised in **Table 5.8**.

Table 5.9 Original and revised uses

Use	Original Proposal	Revised Proposal	Reduction
Commercial and leisure (sq m)	4,040	2,080 ⁴	-1,960 (48.5%)
Museum and visitor centre (sq m)	1,950	0 ¹	-1,950 (100%)
Sail training/youth centre (sq m)	300	0 ²	-300 (100%)
Hotel (bedrooms)	80	0	-80 (100%)
Residential (units)	326 ³	259	-67 (20.5%)
Marina (berths)	500	250	-250 (50.0%)
Car parking (visitor spaces)	250	170	-80 (32.0%)

¹ Retention/possible expansion of the existing Maritime Museum only.

² Retention/refurbishment of the existing Holyhead Sailing Club only.

³ Impact was assessed on 326 units although the outline consent provided for 380 units.

⁴ Shell only, not including any potential mezzanine fit-out by tenants.

The reduced scale of the revised Proposed Development will result in a lower level of outputs and results in respect of all effects:

- Construction employment as a result of less construction activity.
- Employment and GVA arising directly from reductions in commercial and leisure, museum/visitor centre, sail training/youth centre, hotel, and marina facilities, as well as indirectly in reductions in day and overnight visitors.
- Fiscal effects (business rates and Council Tax) as a result of reduced commercial space and residential units.
- Household expenditure from fewer households.
- Primary healthcare and school places as a result also of fewer households.

However, a secondary issue would be the level of impacts generated. These would be subject to adjustment of the assessed additionality of the revised proposals in the context of economic conditions and recovery from the effects of Covid-19. In practice, this would result in higher rates of additionality and hence the overall level of reductions would not be directly pro-rata to reductions in proposed uses.

5.12.4 Approach to providing required information

With respect to the assessment of the socio-economic effects of the revised Proposed Development, it is considered that:

- the methodology and approach to the assessment remains appropriate; and
- the five effects previously assessed (construction employment, 'operational' employment & GVA, local fiscal effects (Council tax and business rates), household expenditure, and local services (healthcare and education) also remain appropriate.

Of the five effects, three (employment and GVA, fiscal effects, and household expenditure) were considered to be of a medium/moderate magnitude and therefore warrant re-assessment in view of the significant change in the scale of the Proposed Development. The magnitude of the effects will be reduced in each case, and re-assessment would confirm the scale of the reduction. Healthcare and school places issues were considered to be of a low/negligible magnitude and, subject to confirmation of the context of NHS dentistry provision, may require commentary only.

Current baseline socio-economic conditions will vary from that set out in the original assessment. Updating of the baseline would quantify the predicted changes and their consequent effects.

5.13 Climate Change

5.13.1 Introduction

Climate change was not assessed in the 2020 ES. This chapter will therefore comprise the climate change assessment, as required by the 2014/52/EU EIA Directive, which states that the ES should include consideration of the *“impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change”*.

The climate change chapter will comprise two separate sub-assessments. Firstly, the impact and magnitude of emissions arising from the Proposed Development will be considered through a greenhouse gas (GHG) assessment, where emissions from the construction and operational phases will be quantified. In addition, an assessment of the vulnerability and resilience of the Proposed Development to the projected effects of climate change will be undertaken.

5.13.2 Previous work undertaken and new information on the baseline environment

Climate change has not been explicitly considered as part of the previous applications for the Proposed Development. Therefore, the information presented as part of this chapter will be a new component of the ES. The effect of climate change on sea level rise was previously included as part of the Hydrodynamics, Sedimentation and Wave Climate assessment (see **Section 5.1**). Furthermore, the risk to the Proposed Development from flooding, including under relevant climate change projections was considered as part of the Water Quality, Surface Waters and Flood Risk chapter (see **Section 5.8**).

5.13.3 Identification of key issues

Infrastructure and activities associated with the Proposed Development have the potential to release GHG to the atmosphere. The assessment will quantify emissions associated with the following activities, where information is available:

- Construction phase:
 - o ‘Embodied’ emissions within the main materials used during construction. This includes ‘cradle-to-gate’ emissions, therefore encompasses the extraction, production and transport of materials to the site;
 - o Emissions from fuel and electricity consumed by construction plant and equipment; and,
 - o Emissions from transport movements, including marine vessels and road vehicles.
- Operational phase:
 - o Emissions from transport movements, including marine vessels and road vehicles;
 - o Consumption of fuel and electricity within buildings at the Proposed Development; and,
 - o Emissions from waste and wastewater disposal, and water consumption.

The infrastructure and assets associated with the Proposed Development could be vulnerable to future changes to the climate. The vulnerability and resilience assessment will identify the main climate hazards that could affect the Proposed Development as a result of climate change under a range of future projections. The main climate hazards to the site are likely to be surface water flooding, storms (high wind and precipitation events) sea level rise and storm surges.

The design of infrastructure will then be reviewed in the context of the future climate projections to determine the vulnerability and resilience of the current design of the Proposed Development. Climate adaption measures will be recommended where required.

5.13.4 Approach to providing required information

The GHG assessment would be carried out in accordance with best practice guidance and methodologies, such as the GHG Protocol, an internationally recognised corporate reporting standard. Activity and emission source data will be obtained from the project team, and emission factors will be obtained from databases such as the Inventory for Carbon and Energy (ICE), and Defra and BEIS.

There are no recognised significance criteria for GHG assessment in EIA. Due to the global nature of the effect 'i.e. climate change', significance criteria will be derived from IEMA guidance (IEMA, 2016), which acknowledges that *"any GHG emissions arising from a project can be considered as significant"*, but *"it is down to the practitioner's professional judgement on how best to contextualise a project's GHG impact"*. GHG emissions will therefore be compared to national carbon budgets, and those already emitted within the Ilse of Anglesey County Council administrative region.

The vulnerability and resilience assessment will be undertaken in accordance with the approach set out in IEMA guidance document *"Environmental Impact Assessment Guide to Climate Change Resilience and Adaptation"*. Design information and data for the Proposed Development will be obtained from the Project Team. Data for future climate parameters at the site will be obtained from the UK Climate Projections (UKCP18) database.

5.14 Population and Human Health

5.14.1 Introduction

This section presents an overview of the previous work undertaken within the 2020 ES in terms of population and human health, provides new information on the baseline environment and then identifies key issues arising from the updated Proposed Development. Finally, this section sets out the approach to providing the required information on population and human health.

5.14.2 Previous work undertaken and new information on the baseline environment

5.14.2.1 Previous work undertaken

Specific impacts to population and human health were covered in the following sections of the 2020 ES: Air Quality; Ground and Geo-environmental Conditions; Water Quality, Surface Waters and Flood Risk; and, Noise and Vibration.

There are a number of human health receptors near the Proposed Development, including:

- Several residential properties located along Beach Road. The nearest properties to the Proposed Development are Trefenfam Farm 55m to the west, the Boathouse Hotel 100m to the south-east and houses along Tan-Y-Bryn Road 105m to the south.
- Residential properties are also located adjacent to the local road network to be used by development traffic, including the A5154 Victoria Road.
- The nearest schools to the site are Ysgol Gynradd Y-Parc 440m to the south-east and Holyhead High School 580m to the south.
- The Port of Holyhead is located 710m to the east.

The Construction Dust Assessment assessed the potential impact to nearby sensitive receptor through human health effects. Through the incorporation of standard dust mitigation measures during the construction works no unacceptable impact on human health was identified.

No unacceptable impacts from increased exhaust emissions on human health was identified through the additional traffic associated with the Proposed Development.

An Environmental Preliminary Ground Investigation Report (2019) found a sample of asbestos cement sheeting from Soldier's Point House was found to contain asbestos chrysotile fibres. It is considered that from a human health perspective that the likelihood of asbestos containing materials in the localised vicinity of Soldier's Point House may represent an unacceptable risk. To minimise the potential exposure risk to construction and maintenance workers by the Control of Asbestos Regulations 2012 should be adhered to.

The Noise Impact Assessment found the highest noise levels would likely be created during rock drilling operations and the construction of the infrastructure when plant is at its closest to property boundaries adjacent to Beach Road and Trinity Court. The effects would be mitigated by monitoring of vibration level during rock drilling and any vibration compaction stages of construction and monitoring noise levels during stages of the construction to ensure the impact is minimised.

5.14.2.2 New information on the baseline environment

The 2020 ES did not include a chapter on population and human health, so no information on the baseline environment was included.

Population and human health are two of the factors which the amended EIA Directive (2014/52/EU) requires to be assessed within EIA. In the UK, the public health profession uses the World Health Organisation (WHO) definition of health, where health is defined as a state of complete physical, mental and social wellbeing and not merely the absence of disease or infirmity (World Health Organisation, 1946).

The Isle of Anglesey has a resident population of 70,100, almost a quarter of who are aged 65 years and over, 3% aged 85 years and over and 60% of the population aged between 16 and 64 years¹⁰. By 2030, the total population is predicted to decline to 69,300, with 31% aged 65 years and over and 6% aged 85 years and over.

15% of Anglesey's population live in the most deprived areas of Wales. The most deprived communities have higher prevalence of smoking, obesity, excessive alcohol consumption, poor diet and inactivity compared with the least deprived members of the community, leading to increased risk of chronic conditions and poor health outcomes.

However, statistics show that the amount of people in Anglesey who smoke is decreasing, where 23% of adults in Anglesey reported to be smokers in 2012/13, compared to 25% in 2011/12. Numbers of residents reported to drink more than the recommended amount has also declined in recent years with 40% of adults in Anglesey drinking more than the recommended levels in 2012/13, from 41% in 2011/12.

In Anglesey, the number of adults who are overweight or obese (BMI over 25) has increased from 54% in 2011/12 to 57% in 2012/13. However, 151 people per 100,000 in Anglesey die from cardiovascular disease; this is lower than the North Wales average of 152 per 100,000 population, and the Welsh national average of 157 per 100,000 population.

Overall, residents in Anglesey reported being happier and more satisfied with life, and less anxious than the populations of Wales and the UK as a whole.

5.14.3 Identification of key issues

The construction phase has the potential to affect local people; businesses and activities, both positively and negatively through the impacts to tourism and recreation; traffic and transport; commercial and recreational navigation; air quality; noise and vibration and landscape, seascape and visual amenity.

As the revised Proposed Development is smaller in scale than that assessed within the 2020 ES, potential impacts to human health through changes in air quality or noise during the construction of the Proposed Development would be of a smaller magnitude.

The revised Proposed Development during the operational phase has the potential to:

- Provide an opportunity to improve and enhance Holyhead's tourism, this could affect local people and businesses both positively and negatively;

¹⁰[http://www2.nphs.wales.nhs.uk:8080/LPHTeamsDocs.nsf/\(\\$all\)/70680CC93D61564180257E000034AC5A/\\$file/Anglesey%20PROOF%208.pdf?OpenElement](http://www2.nphs.wales.nhs.uk:8080/LPHTeamsDocs.nsf/($all)/70680CC93D61564180257E000034AC5A/$file/Anglesey%20PROOF%208.pdf?OpenElement)

- Affect local people negatively through increased noise from increased traffic and increased vessels in the marina; and,
- Negative indirect effects to human health through the change of character of the surrounding landscape and seascape.

5.14.4 Approach to providing required information

Potential impacts to population during the construction and operational phases of the Proposed Development will be examined and assessed using the information determine in the assessment of the Proposed Development within the following sections:

- Landscape, seascape and visual effects (**Section 5.4**);
- Water quality, surface waters and flood risk (**Section 5.8**); and,
- Socio-economic effects (**Section 5.12**).

Potential impacts to human health during the construction and operational phases of the Proposed Development will be examined and assessed using the information produced in the assessment of the Proposed Development within the following sections:

- Traffic and transport (**Section 5.2**);
- Air quality (**Section 5.3**);
- Ecology and Nature Conservation (**Section 5.5**);
- Ground and Geo-environmental Conditions (**Section 5.7**);
- Water quality, surface water and flood risk (**Section 5.8**);
- Noise and vibration (**Section 5.9**); and,
- Commercial and recreational navigation (**Section 5.10**).

Published human health data will be reviewed together with a literature review. Data sources will include development plans and census data. No surveys are considered necessary.

5.15 Accidents and Disasters

5.15.1 Introduction

This section considers the exposure and vulnerability of the Proposed Development to accidents and disasters. Given the nature of this topic this section provides information on the likelihood of potential impacts, as there are no baseline conditions associated with these events, and identifies key issues arising from the revised Proposed Development. Finally, this section sets out the approach to providing the required information on accidents and disasters.

5.15.2 Previous work undertaken and information for potential impacts

5.15.2.1 Previous work undertaken

There was no specific impact assessment on accidents and disasters in the 2020 ES. It was stated that the Proposed Development is located within a politically, geologically and meteorologically stable part of Europe and it is not a material risk from, for example, civil unrest, war, earthquakes or extreme weather conditions (hurricanes etc.).

However, the risk to the Proposed Development from flooding, including under relevant climate change projections, was assessed in the water quality, surface water and flood risks chapter and a Flood Risk Consequences Assessment, and the risk of traffic accidents was considered within the Traffic and Transport chapter of the 2020 ES.

The following risks for potential accidents and disasters were identified:

- Parts of the Proposed Development Site are located in Flood Zone 3, where there is 1% or higher risk of flooding from the sea in any given year. The Proposed Development Site is partly situated in an area currently designated as Flood Zone C2 (an area of floodplain without significant flood defence infrastructure) according to the Flood Consequence Assessment (FCA) (Ambiental, 2019) with the main risk of flooding coming from surface water flows from outside the Proposed Development area. The FCA concluded that the principal flooding risks attributed to the Proposed Development arise from:
 - o Coastal flooding from high tides; and,
 - o Wave action in combination with high tides.
- Risks to flooding arising from the Proposed Development were mitigated through the design of drainage systems and the free flow of water into Holyhead Harbour, and the design still water level and parapet which would prevent any flood risk through wave action.
- There is no evidence of any material existing local road safety hazards that concerns the context of the Proposed Development. Risks to traffic accidents associated with the forecast development-related traffic was anticipated to be on slight adverse in nature in the 2020 ES.

5.15.2.2 New information on the potential impacts

Table 5.9 provides a list of Major Accidents and Disasters compiled from the National Risk Register (Cabinet Office, 2017), the UK Government's Emergency Response and Recovery Guide¹¹ and the Red Cross' Disaster and Crisis Management Guidance (International Federation of Red Cross and Red Crescent Societies (IFRC), 2018). The assessment considers how the location and the use of the Proposed

¹¹ <https://www.gov.uk/guidance/emergency-response-and-recovery>

Development would affect the risk posed by each type of accident or disaster and whether this accident or disaster type is likely and requires further consideration.

Table 5.10 Initial List of Accidents and Disasters and Determination of Further Consideration

Accident/Disaster Type	Location risk	Proposed use risk	Further consideration required?
Biological hazards: epidemics	x	x	No (screened out)
Biological hazards: animal and insect infestation	x	x	No (screened out)
Earthquakes	x	x	No (screened out)
Mass movements	x	x	No (screened out)
Tsunamis	x	x	No (screened out)
Volcanic eruptions	x	x	No (screened out)
Severe weather: storms	✓	✓	Yes
Severe weather: drought	x	x	No (screened out)
Severe weather: extreme temperatures	x	x	No (screened out)
Floods	✓	✓	Yes
Tidal waves/storm surges	✓	✓	Yes
Wildfires	x	x	No (screened out)
Poor air quality events	x	x	No (screened out)
Transport accidents	✓	✓	Yes
Industrial accidents	✓	✓	No (screened out)
Electricity, gas, water supply or sewerage system failures	✓	✓	Yes
Urban fires	x	x	No (screened out)
Famine/food security	x	x	No (screened out)
Displaced populations	x	x	No (screened out)
Complex emergencies	x	x	No (screened out)
Terrorist incidents	x	x	No (screened out)
Cyber attacks	x	x	No (screened out)
Disruptive industrial action	x	x	No (screened out)
Public disorder	x	x	No (screened out)
Severe space weather	x	x	No (screened out)

Therefore, the following accidents and disasters are screened into further consideration:

- Severe weather – storms;
- Floods;
- Tidal waves / storm surges;
- Transport accidents; and,

- Electricity, gas, water supply or sewerage systems failures.

Table 5.11 identifies whether there are sufficient national regulations, policies and procedures in place that mitigate or prevent them.

Table 5.11 Refined List of Accidents and Disasters

Accident and disaster type	Standard UK policies and procedures in place for mitigation/prevention	Further assessment required
Severe weather: storms	National Severe Weather Warning Service - Met Office ¹²	No
Tidal waves/storm surges	National Severe Weather Warning Service - Met Office	No
Floods	Flood Warning Service – NRW ¹³	No
Transport accidents	Health and Safety at Work Act 1947	No
Electricity, gas, water supply or sewerage systems failures	Call/response procedure to report electricity, gas, water supply or sewerage system failure to relevant utilities provider	No

Table 5.10 identifies that there are sufficient national regulations, policies and procedures in place that mitigate or prevent the identified accidents and disasters.

5.15.3 Approach to providing required information

Due to the nature of accidents and disasters listed above it is considered that there are sufficient policies and procedures in place such that there are sufficiently mitigated and reduced to the extent that they are unlikely or unexpected. The other key issues arising from the Proposed Development in relation to accidents and disasters will be covered in:

- Traffic and transport (**Section 5.2**); and,
- Water quality, surface water and flood risk (**Section 5.8**).

As such, accidents and disasters is scoped out for further assessment.

¹² <https://www.metoffice.gov.uk/weather/warnings-and-advice/uk-warnings#?date=2019-05-31>

¹³ <https://naturalresources.wales/flooding/check-flood-warnings/?lang=en>

6 Cumulative Effects

6.1 Introduction

There is no legislation that specifically applies to CIA or that outlines how such assessments should be undertaken; however, the EIA Directive (85/337/EEC) and associated EIA Regulations require consideration of direct and any indirect, secondary and cumulative effects of a project. However, a commonly accepted description is:

“Impacts that result from incremental changes caused by other past, present or reasonably foreseeable actions together with the project.” (European Commission, 1999)

Paragraph 5(e) of Schedule 4 of the EIA Regulations requires a “*description of the likely significant effects of the development on the environment resulting from...the cumulation of effects with other existing and/or approved projects...*” In this regard the regulations are specific about the projects that should be considered to result in cumulative effects i.e. existing and/or approved projects.

CIA assesses the potential impacts of a Proposed Development with other past, present (current) and reasonably foreseeable (proposed) plans and projects. With respect to ‘past’ projects, a useful ground rule in CIA is that the environmental impacts of schemes that have been completed should be included within the environmental baseline; as such, these impacts are already taken into account in the EIA process for a development. Consequently, generally completed projects can be excluded from the scope of the CIA. However, the environmental impacts of recently completed projects may not be fully manifested and, therefore, the potential impacts of such projects should be taken into account.

In line with established practice, this assessment will be limited to the plans and projects where there is sufficient information to allow for the consideration of the potential for a cumulative effect to arise. In the absence of publicly available information (usually in the form of consent applications) or a defined ‘scheme’, it is not possible to undertake a proper consideration of cumulative effects (i.e. if proposals are speculative or where assumptions regarding the potential impacts may be contentious).

All receptors considered as part of the EIA will initially be considered as part of the CIA, with a view to remove receptors from the scope where no pathway is predicted. The CIA will be undertaken using the same methodology used for the EIA. The approach to and scope of the CIA will be agreed through consultation with NRW and the IoACC.

6.2 Initial list of potential plans and projects

The following projects have been identified as having the potential to result in cumulative effects with the Proposed Development as a result of their location and the potential impacts that could arise during the construction and operational phases:

- Parc Cybi;
- Penrhos Leisure Village;
- Holyhead Eco-Park;
- Holyhead Deep;
- West Anglesey Demonstration Zone;
- Business Units at Penrhos Industrial Estate;

- Residential Development at South Stack Road (Phase 1);
- Residential Development at South Stack Road (Phase 2);
- Port of Holyhead Expansion;
- Holyhead Breakwater Refurbishment; and
- Holyhead Marina Re-Build.

These projects and any others identified during the EIA process will be monitored so that they will be updated, and new information can be incorporated into the CIA, as far as practicable.

The CIA in the 2020 ES was undertaken for the larger 2020 scheme and no cumulative effects were identified.

7 Habitats Regulations Assessment

7.1 Introduction

This section presents an overview of the previous work presented within the 2020 ES in terms of the requirements of the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations), provides new information on the baseline environment and then identifies key issues arising from the revised Proposed Development. Finally, this section sets out the approach to providing the required information for the HRA.

7.2 Previous work undertaken and new information on the baseline environment

7.2.1 Previous work undertaken

An HRA Screening for Likely Significant Effect (LSE) Report (Royal HaskoningDHV, 2019) was prepared in support of the s73 application and which was presented in the 2020 ES. The Screening Report identified the following European sites that had the potential to be affected by the Proposed Development:

- Gogledd Môn Forol / North Anglesey Marine SAC;
- Morwenoliaid Ynys Môn / Anglesey Terns SPA; and,
- Glannau Ynys Gybi / Holy Island Coast SPA and SAC.

7.2.2 New information on the baseline environment

Since the production of the HRA Screening for LSE Report, an amendment to the Habitats Regulations has been published: The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. The amendment creates a 'National Site Network' (NSN) to retain the concept of a UK network of sites and management objectives are established for the NSN. The role of the European Commission in determining whether Imperative Reasons of Overriding Public Interest (IROPI) apply in relation to plans and projects now falls to the Welsh Minister in Wales.

7.3 Identification of key issues

7.3.1 Key issues identified in the HRA Screening for LSE Report

No LSE was predicted on the Morwenoliaid Ynys Môn / Anglesey Terns SPA, the Gogledd Môn Forol / North Anglesey Marine SAC or the Glannau Ynys Gybi / Holy Island Coast SPA from effects arising from the construction or operational phases of the Proposed Development.

LSE was predicted on the European dry heaths and Northern Atlantic wet heaths with *Erica tetralix* habitats through indirect effects arising from the construction and operational phases of the project. As such these qualifying features were screened 'in' to the next stage of the HRA process (Appropriate Assessment (AA)) for the potential of the operational phase of the Proposed Development alone, to determine whether an adverse effect on site integrity could occur.

The information provided for the AA, as presented in Section 8.7 of the 2020 ES, concluded that the potential impacts to the SAC could be addressed through appropriate mitigation measures, including management measures to restore fencing, public paths and signage, to maintain habitat quality and direct visitors away from any sensitive areas. No adverse effect on site integrity was concluded.

No in-combination LSEs during the construction or operational phases with other plans or projects were identified.

7.3.2 Key issues identified to those considered by the HRA Screening for LSE report

The revised Proposed Development is considered to reduce the potential recreation pressures on the Glannau Ynys Gybi / Holy Island Coast SAC, given the reduced housing provision, marina and removal of the hotel.

Details of the revised Proposed Development that require further consideration include:

- North Anglesey Marine / Gogledd Mon Forol SAC:
 - o During construction
 - Underwater noise during the reclamation works and from construction vessels and dredging;
 - Increased collision risk with construction vessels;
 - Potential changes in prey availability through increased suspended sediment and risk from contaminants during the dredge and disposal activities; and,
 - Potential changes in prey availability due to smothering of habitats as a result of the deposition of the dredge plume.

7.4 Approach to providing required information

The HRA screening for LSE report will be updated to reflect the revised Proposed Development and more detailed information that is available. Where necessary, information for AA will be provided and presented in the ES, using the findings of the assessment on Ornithology, Terrestrial Ecology, Marine and Coastal Ecology and Marine Mammals.

8 Water Framework Directive Compliance Assessment

8.1 Introduction

This section presents an overview of the previous work presented within the 2020 ES in terms of the requirements of the WFD, provides information on the baseline environment and then identifies key issues arising from the revised Proposed Development. Finally, this section sets out the approach to providing the required information for the WFD.

8.2 Previous work undertaken and new information on the baseline environment

8.2.1 Previous work undertaken

The WFD Compliance Assessment was undertaken on the Holyhead Bay coastal water body and the Ynys Mon Secondary groundwater body as the footprint of the Proposed Development is within these water bodies. Details on these waterbodies were extracted from the Water Watch Wales Cycle 2 (2018) Water Body Map database¹⁴.

The assessment was carried out in line with the internal NRW guidance 'OGN 72' (NRW, 2018) which replaced the Environment Agency's (EA) guidance 'Clearing the Waters on dredging and disposal activity in coastal and estuarine environments'. It was also supplemented by the EA's guidance 'Clearing the Waters For All' (Environment Agency, 2017) to ensure consistency of process.

8.2.2 New information on the baseline environment

No new information was available on WFD parameters to that presented in the 2020 ES.

8.3 Identification of key issues

8.3.1 Key issues identified in the WFD Compliance Assessment

The WFD Assessment in the 2020 ES was based on a number of assumptions. These included:

- No dredging was required for the installation of any marine elements;
- Land-side construction elements would not involve significant piling or removal of earth such that the groundwater would be affected;
- Construction activities would be undertaken using best-practice measures to reduce the risk of a spill event;
- Operationally, a surface water drainage system would be put in place to avoid the risk of a deterioration in groundwater quality; and,
- Marina water quality management measures would be enforced during operation to prevent pollution.

Construction and operation activities for the Ynys Mon groundwater body were not taken forward to scoping as no pathways for impacts to occur were identified.

¹⁴ <https://nrw.maps.arcgis.com/apps/webappviewer/index.html?id=4ef6ea25c5984c939636714dbfcea25f3>

The construction activity 'construction of marine structures (i.e. development below the level of MHWS)' operational activity 'presence of marine structures' were taken forward to scoping as impacts to the Holyhead Bay coastal water body could not be ruled out due to effects on habitats and hydromorphology parameters.

The Detailed Assessment of these impacts on the Holyhead Bay coastal water body, informed by the assessments undertaken within the Intertidal and Benthic Ecology and Hydrodynamics, Wave Climate and Sediment Transport chapters of the 2020 ES concluded that these activities would not result in a non-temporary effects on the Holyhead Bay coastal water body. As a result, the Proposed Development was considered to be compliant with WFD requirements.

8.3.2 Key issues identified since the 2020 ES

The revised Proposed Development requires dredging within the footprint of the proposed breakwater, and the disposal of this material at an offshore disposal site (Holyhead North IS043). Terrestrial components of the Proposed Development have also been updated and as such an assessment of potential effects on groundwater will need to be undertaken and effects of surface run-off into the coastal water body will also need to be updated.

8.4 Approach to providing required information

A sediment quality survey has been undertaken and the sediment analysed to provide information on the chemical quality of the sediment to be dredged (see **Section 4.3**). This information, in combination with the updated intertidal and subtidal ecology surveys and hydrodynamic modelling and the updated assessments presented in the hydrodynamics, wave climate and sediment transport, intertidal and benthic ecology and water quality and flood risk chapters will be used to update the assessment of construction activities on the Holyhead Bay coastal water body.

9 Approach to Providing Required Information to Support Marine Licence, HRO and Detailed Planning Applications

The approach to providing the required information to inform the EIA is summarised in **Table 9.1**.

Table 9.1 Summary of the proposed approach to the assessment

Topic	Approach
Hydrodynamics, Sedimentation and Wave Climate	An updated assessment will be presented to include dredging and disposal activities and the updated design, supported by subtidal sediment PSA, and hydrodynamic, wave transformation and wave penetration modelling.
Traffic and Transport	The potential impact of traffic associated with the Proposed Development will be considered in a formal Traffic Assessment (TA) report.
Air Quality	The changes to the design are not considered to change the conclusions of the 2020 ES; however, the assessment will be revisited using updated baseline information and informed by the TA.
Landscape, Seascape and Visual Effects	Assessment will be updated to reflect the changes to the Proposed Development including revised photomontages.
Ecology and Nature Conservation	Terrestrial Ecology – the potential impact on habitat loss and biodiversity will be assessed. Intertidal and Benthic Ecology – the assessment will be updated to reflect the updated footprint and addition of dredging and disposal activities for the Proposed Development and will be supported by intertidal walkover and subtidal video survey data to map the habitats affected. Ornithology – the assessment will be updated to include potential impacts arising from dredging and disposal activities. Fish and Shellfish Resource will be assessed. Marine Mammals – the assessment will be updated to include potential impacts arising from dredging and disposal activities.
Commercial and Recreational Fisheries	Scoped out of further assessment.
Ground and Geo-environmental Conditions	The updates to the design are not considered to change the conclusions of the 2020 ES. However, additional information from the authorities, or from additional ground investigation works will be reviewed to confirm the baseline conditions and to revise the assessment and mitigation measures, if considered appropriate.
Water Quality, Surface Waters and Flood Risk	The assessment will be updated to include impacts arising from dredging and disposal activities. Informed by sediment chemical analysis results and hydrodynamic modelling. The FCA will also be updated to reflect the updates to the Proposed Development.
Noise and Vibration	The proposed changes are likely to result in no change or slight improvement in effects on receptors, however the assessment will be updated to reflect the changes in the construction and operation of the Proposed Development.
Commercial and Recreational Navigation	To be assessed.
Archaeology and Cultural Heritage	Any potential impacts as a result of the alterations to the boundary of the Proposed Development will be discussed further. This will be informed by further enquiries to HER for updated records, review of the subtidal video transect survey, consideration of the PSA of seabed sediment and numerical modelling.
Socio-economic Effects	Current baseline socio-economic conditions will vary from that set out in the original assessment. Updating of the baseline is required to quantify the changes.
Climate Change	To be assessed.
Public and Human Health	To be assessed.

Topic	Approach
Accidents and Disasters	Scoped out of further assessment.
HRA	It is considered that the reduction in accommodation will reduce recreational impacts to the Holy Island Coast SAC. The assessment for North Anglesey Marine SAC will be updated to include impacts to protected species arising through dredging and disposal activities.
WFD	The assessment will be updated to assess the potential impacts arising from dredging and disposal activities and will be informed by the sediment contaminant results, hydrodynamic modelling and the assessments presented in Hydrodynamics, Sedimentation and Wave Climate, Intertidal and Benthic Ecology and Water Quality, Surface Waters and Flood Risk chapters.

10 Proposed Approach to the EIA

10.1 EIA methodology

The approach to EIA is not standardised, but there are established and recognised approaches set out by professional institutions as to methods to be used for the assessment of environmental effects. Where appropriate, the environmental effects of the Proposed Development have been assessed using definitive standards, legislation and guidance applicable to each of the technical areas covered within the ES.

The information and knowledge required to produce the ES will be acquired from a variety of sources to ensure that all effects have been assessed. These sources will include:

- discussions with technical consultees;
- review of public files and records;
- review of historical mapping and aerial photography;
- site surveys undertaken by the Applicant;
- surveys and assessments undertaken previously at the Site;
- specialist studies, such as wave modelling; and,
- expert knowledge from within the consultancy team.

In order to provide a clear and robust assessment, each of the technical chapters presented within the ES will follow the structure set out in the subsequent paragraphs.

10.1.1 Assessment of Effects

This section of each chapter will describe the likely significant environmental effects of the Proposed Development on the baseline condition of the Site and the surrounding area relevant to the assessment topic. As indicated above, the assessment will consider potential future changes in the baseline environment. The assessment will include a description of the nature, extent and significance of these effects and will take into account any mitigation measures that have specifically been incorporated into the Proposed Development to reduce the environmental effects of the project.

The EIA Regulations do not provide definitive methods for the assessment of significance and a variety of methods are employed within ES's. The method used to assess the effects will be specific to each discipline. Where available and appropriate, the assessments will follow impact assessment criteria and methodology set out by relevant professional institutions e.g. Institute of Ecology and Environmental Management, Landscape Institute etc. Where such guidance is not available, or prescriptive methods are not set out by a relevant professional body, then assessment criteria will be developed by the technical specialists employed to enable a clear and structured assessment to be undertaken.

The significance of the effect upon the environment of the Proposed Development (i.e. the consequence of any impacts) will, in general, be derived by considering the magnitude of the impact (i.e. the changes resulting from an action) and the sensitivity of the relevant receptor.

Depending upon the discipline, there are a number of factors that need to be taken into account when establishing the type and magnitude of an impact, including:

- whether the effect is Adverse or Beneficial;
- whether it is temporary or permanent;
- the extent or spatial scale of the effect;
- the duration of the effect;
- whether the effect is reversible; and,
- the probability/likelihood of the effect taking place.

Similarly, the sensitivity of a receptor is the function of several elements dependent upon the discipline and the impacts being assessed, which could include:

- designation and legal status;
- quality;
- rarity; and,
- ability to adapt to change.

Having established the magnitude of the impact and the sensitivity of the receptor, the level of the effect can then be defined. For some disciplines, a matrix is used to classify the significance of effect by correlating magnitude and sensitivity, as shown in **Table 10.1** below.

Table 10.1 Example Significance of Effect Matrix

		Magnitude of Impact			
		High	Medium	Low	Negligible
Receptor Sensitivity	High	Major	Moderate	Minor to Moderate	Negligible or Minor
	Medium	Moderate	Minor to Moderate	Minor	Negligible
	Low	Minor to Moderate	Minor	Negligible or Minor	Negligible
	Negligible	Negligible or Minor	Negligible	Negligible	Negligible

Where a matrix is not used, the magnitude of impact and the sensitivity of the receptor will be used to make a reasoned professional judgement to establish the significance of the effect (i.e. **Significant** or **Not Significant**).

There is no statutory definition of when an effect is to be regarded as significant and there is often not a single, definitive, correct answer as to whether an effect is significant, or not. A **Significant** effect does not necessarily mean that such an effect is unacceptable to decision-makers or necessarily results in a breach of any particular planning policy. This is a matter to be weighed in the planning judgement/balance alongside other material considerations. What is important, is that the likely significant environmental effects of any proposal are transparently assessed and described in sufficient detail to enable the determining authority to make a balanced and well-informed judgement as part of the decision-making process.

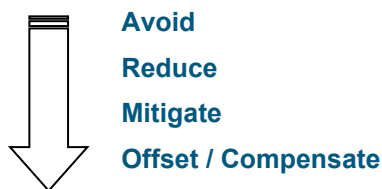
Where the findings of an assessment are set out as different levels of effect (e.g. **Negligible**, **Minor**, **Moderate** or **Major**) the assessment will clearly set out where an effect is considered to be **Significant**. This may vary between disciplines and the threshold is will be defined within each chapter. This approach

is used to assist the decision-maker, consultees and other interested parties in establishing the most important environmental effects of the Proposed Development.

In all instances, the assessment will set out the basis of the judgements made so that the readers of the ES can see the weight attached to the different factors and can understand the rationale behind the assessment. In this sense, the ES will clearly explain how the significance of effects has been derived.

10.1.2 Mitigation

It is a requirement of the EIA Regulations to describe the measures envisaged to prevent, reduce and where possible off-set any significant effects on the environment. Whilst not a requirement of the EIA Regulations, mitigation measures can be used to reduce or avoid any adverse effect, irrespective of whether that effect is deemed to be **Significant**. Mitigation can be achieved in several ways as listed below. This approach is often referred to as the mitigation hierarchy, with mitigation being selected as high up the hierarchy as possible.



Many of the mitigation measures proposed as part of the development have been incorporated as a result of decisions taken during the initial design stages of the Proposed Development. Where appropriate, key 'incorporated' mitigation measures, relevant to the technical assessments, will be described within each chapter. On the basis that these mitigation measures are to be embedded within the project, they will be taken into account when coming to a judgment of the significance of the effects of the Proposed Development.

Where additional mitigation, compensation or enhancement measures are proposed to prevent, reduce or off-set adverse effects, unavoidable through design, or to provide benefits to the Proposed Development/local environment, these are described separately within the mitigation section of each chapter. Where such measures have been defined, an explanation is provided of how these measures would mitigate/reduce the identified effects of the Proposed Development.

10.1.3 Residual Effects and Conclusions

This section of each technical chapter provides a textual description of the likely residual effects of the Proposed Development following the implementation of any additional mitigation or enhancement measures.

The conclusions summarise the key elements of the assessment and include a statement on whether the Proposed Development is likely to result in any significant environmental effects.

10.2 Consideration of Alternatives

In accordance with Article 5 of the EIA Directive, the ES will include a description of the main alternatives considered by the applicant and an indication of the main reasons for selecting the preferred option, taking into account the environmental effects of the alternatives. This section of the ES helps to justify the selection of the preferred option(s) to be taken forward.

10.3 Consultation Process

It will be necessary to engage with stakeholders throughout the EIA process with the aim of ensuring that all relevant stakeholders with the potential to be impacted by the Proposed Development are consulted.

Key stakeholders will be identified through a stakeholder mapping exercising. The likely key stakeholders that will be included in all consultations are: the MMO, NRW, IoACC, Holyhead Port, Cadw, RSPB Cymru, Holyhead Town Council, GAT, RCAHMW, The Crown Estate, North Wales Wildlife Trust, Holyhead Coastguard, Holyhead Marina, various users of sea around Holyhead (such as Holyhead Sailing Club and Anglesey Divers, local fishermen and the local communities).

10.4 Preparation of the Environmental Statement

The ES is a formal document that presents the findings of the EIA process. The ES will take the form of:

- **Project Introduction** – including a statement of need and a description of the EIA process, with details on Screening, Scoping, consultation and impact assessment methodology;
- **Project Description** – a detailed description of the construction and operational phases of the Proposed Development, including the alternatives considered and reasons for selection preferred project;
- **Baseline Environment** – detailed description of the existing environment for all environmental parameters identified as requiring further assessment during the Scoping stage;
- **Impact Assessment** – detailed description of the potential impacts of the Proposed Development (both positive and negative), mitigation measures and residual impacts for all environmental parameters;
- **Summary of Findings** – a summary table detailing the predicted impacts; residual impacts following mitigation; and, the significance of their effects;
- **A list of references** of information and publications cited in the ES; and,
- **Appendices** – survey information and supplementary report that may be produced during the EIA process.

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Appendix A

2014 Outline Planning Permission



**CYNGOR SIR
YNYS MÔN
ISLE OF ANGLESEY
COUNTY COUNCIL**

Conygar Stenaline Ltd
c/o Mr David Jones
Axis Ped Ltd
Camellia House
76 Water Lane
Wilmslow
Cheshire
SK9 5BB

Annwyl Syr/Madam,

DEDDF CYNLLUNIO GWLAD A THREF 1990

RHYBUDD PENDERFYNIAD

Darllenwch yr amodau isod yn ofalus iawn rhag ofn, o fethu cydymffurfio a nhw, y bydd hynny'n gwneud eich caniatad cynllunio'n annilys.

Cais amlinellol ar gyfer datblygiad defnydd cymysg gyda marina newydd, eiddo preswyl, gwesty, defnyddiau masnachol a hamdden ac adwerthu ynghyd â gwaith cysylltiol i adennill tir ac isadeiledd gwasanaethu yn / Outline application for a mixed-use development consisting of a new marina, residential properties, a hotel, commercial, leisure and retail uses together with associated land reclamation and service infrastructure at Holyhead Waterfront, Holyhead

Mae eich cais wedi cael ei ystyried gan y Cyngor yn unol a'i awdurdod dan y Ddeddf uchod, a rhoddwyd **CANIATÂD** gyda'r amodau canlynol:-

Diffiniadau

Bydd y 'Gwaith Rhagarweiniol Galluogi, Mynegiad ac Isadeiledd' yn cynnwys y canlynol:

- ☐ Llwyfannau datblygu
- ☐ Môrgloddiau newydd
- ☐ Basn Marina
- ☐ Pontŵns ac angorfeydd
- ☐ Isadeiledd gwasanaethau draenio
- ☐ Ffyrdd mynediad a gwaith priffyrdd
- ☐ Waliau môr perimedr

Mae'r diffiniad 'Prif Datblygiad' yn ymwneud â phob agwedd arall o'r datblygiad a gymeradwywyd sydd wedi ei eithrio o'r diffiniad blaenorol.

(01) Ni chaniateir dechrau unrhyw ran o'r Prif

JIM WOODCOCK

Pennaeth Gwasanaeth Cynllunio
Head of Planning Service
CYNGOR SIR YNYS MÔN
ISLE OF ANGLESEY COUNTY COUNCIL
Swyddfa'r Sir
LLANGEFNI
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☎(01248) 752428 Fax: (01248) 752430

Gofynnwch am/Ask for: **Dewi F. Jones**
☎ **(01248) 752420**
e-mail: dfjpl@anglesey.gov.uk

Cais Rhif / App. No. **19C1046A/EIA/ECON**

Dear Sir/Madam,

TOWN AND COUNTRY PLANNING ACT 1990

NOTICE OF DECISION

Please read the conditions listed below carefully as failure to comply may invalidate your planning permission.

Your application has been considered by the Council in pursuance of its powers under the above mentioned Act and permission has been **APPROVED** subject to the following conditions:-

Definitions

The 'Preliminary Enabling, Access and Infrastructure Works' shall include the following:

- ☐ Development platforms.
- ☐ New breakwaters.
- ☐ Marina basin.
- ☐ Pontoons & berths
- ☐ Services and drainage infrastructure.
- ☐ Access roads and highway works.
- ☐ Perimeter sea walls

The definition 'Main Development' relates to all other aspects of the approved development excluded from the preceding definition.

(01) No part of the Main Development hereby

Ddatblygiad a ganiateir yma hyd nes bod manylion yn ymwneud a gosodiad, maint, edrychiad allanol unrhyw adeiladau sydd i'w codi, y dull o gael mynediad iddynt a thirlunio'r safle (a elwir ar ôl hyn y 'materion wrth gefn') mewn perthynas â'r rhan honno o'r Prif Ddatblygiad, wedi ei gyflwyno i'r Awdurdod Cynllunio Lleol ac wedi derbyn ei ganiatâd ysgrifenedig.

Rheswm: Cais amlinellol yw hwn a bydd y materion wrth gefn angen eu hystyried yn fanwl.

(02) Rhaid cyflwyno cynlluniau a manylion am y materion wrth gefn y cyfeirir atynt yn Amod 1 uchod, yn ymwneud â gosodiad, maint, edrychiad allanol unrhyw adeiladau sydd i'w codi, y dull o gael mynediad iddynt a thirlunio'r safle, i'r Awdurdod Cynllunio Lleol a derbyn ei ganiatâd ysgrifenedig a rhaid eu gwneud yn union fel y cawsant eu cymeradwyo.

Rheswm: Cais amlinellol yw hwn a bydd y materion wrth gefn angen eu hystyried yn fanwl.

(03) Rhaid gwneud cais i gymeradwyo'r materion wrth gefn i'r Awdurdod Cynllunio Lleol cyn diwedd 5 mlynedd o ddyddiad y caniatâd hwn.

Rheswm: Angen eu gosod yn unol ag Adran 92 Deddf Cynllunio Gwlad a Thref 1990.

(04) Rhaid dechrau'r datblygiad a ganiateir yma naill ai cyn pen saith mlynedd o ddyddiad y caniatâd hwn neu ddiwedd ddwy flynedd o ddyddiad caniatâu'r olaf o'r materion wrth gefn, p'un bynnag yw'r diwethaf.

Rheswm: Angen eu gosod yn unol ag Adran 92 Deddf Cynllunio Gwlad a Thref 1990.

(05) Rhaid i'r cyflwyniadau ar y materion wrth gefn yng nghyswllt dyluniad ac edrychiad allanol gydymffurfio gyda, a glynu wrth Datganiad Dyluniad a Mynediad Blaen y Dŵr Caergybi a gyflwynwyd (Rhagfyr 2010).

Rheswm: Er mwyn sicrhau y ceir datblygiad boddhaol.

(06) Cyn dechrau'r 'Gwaith Rhagarweiniol Galluogi, Mynediad ac Isadeiledd' rhaid cyflwyno cynllun o ddatblygu fesul cam (a elwir wedi hyn yn rhestr o ddatblygu) i'r awdurdod datblygu lleol a derbyn ei ganiatâd ysgrifenedig. Rhaid i'r rhestr ddatblygu fanylu ar yr holl elfennau cydrannol a fwriedir ar gyfer pob cyfnod ac ni chaniateir dechrau unrhyw gyfnod dilynol cyn y ceir cytundeb ysgrifenedig yr awdurdod cynllunio lleol yn cadarnhau bod y cyfnod blaenorol

permitted shall be commenced until details of the layout, scale, external appearance of any buildings to be erected, the means of access thereto and the landscaping of the site (hereinafter called 'the reserved matters') in respect of that part of the Main Development, have been submitted to and approved in writing by the Local Planning Authority.

Reason: The application is in outline only and the reserved matters will require detailed consideration.

(02) Plans and particulars of the reserved matters referred to in Condition 1 above, relating to the layout, scale, external appearance of any buildings to be erected, the means of access thereto and the landscaping of the site, shall be submitted in to and approved in writing by the Local Planning Authority and shall be carried out as approved.

Reason: The application is in outline only and the reserved matters will require detailed consideration.

(03) Application for approval of the reserved matters shall be made to the Local Planning Authority before the expiration of 5 years from the date of this permission.

Reason: Required to be imposed pursuant to Section 92 of the Town and Country Planning Act 1990.

(04) The development hereby permitted shall be begun either before the expiration of seven years from the date of this permission, or the expiration of two years from the date of approval of the last of the reserved matters to be approved, whichever is the later.

Reason: Required to be imposed pursuant to Section 92 of the Town and Country Planning Act 1990.

(05) The reserved matters submissions in respect of design and external appearance shall be in accordance with and adhere to the submitted Holyhead Waterfront Design and Access Statement (December 2010).

Reason: To ensure a satisfactory development.

(06) Prior to the commencement of 'Preliminary Enabling, Access and Infrastructure Works' a phased scheme of development (hereinafter called the schedule of development) shall be submitted to and approved in writing by the local planning authority. The schedule of development shall detail all component elements proposed in each phase and no subsequent phase may be commenced before

wedi ei gwblhau. Rhaid i bod agwedd o'r rhestr ddatblygu gael ei gweithredu yn unol â'r amod hwn oni bai i'r Awdurdod Cynllunio gytuno fel arall yn ysgrifenedig a chyn gwneud y gwaith.

Rheswm: I hwyluso'r cynllun o ddatblygu fesul cam yn unol â rhestr fydd wedi ei chytuno'n flaenorol.

(07) Rhaid i'r datblygiad a ganiateir fod yn berthnasol i'r manylion hynny a gyflwynwyd gan AXIS P E D Cyf. i'r Awdurdod Cynllunio Lleol dyddiedig Rhagfyr 2010, fel y'i diwygiwyd.

Rheswm: I sicrhau eglurder.

(08) Cyn i'r Prif Ddatblygiad (neu unrhyw ran ohono) ddod i rym, rhaid cyflwyno cynllun ar gyfer codi fesul cam arwyddion traffig ar gyfer Y Bont Ddu i'r Awdurdod Cynllunio Lleol a derbyn ei ganiatad ysgrifenedig.

Rheswm: Er mwyn cynnal diogelwch a llif rhydd y traffig ar y gefnffordd.

(09) Fel rhan o unrhyw gyflwyniad ar gyfer materion wrth gefn, rhaid cyflwyno manylion llawn am osodiad a dyluniad mynedfeydd y safle (yn cynnwys cerbydau a cherddwyr), mynediad mewnol ac ardaloedd cylchu i'r Awdurdod Cynllunio Lleol a derbyn ei ganiatad ac ni chaniateir defnyddio na byw mewn unrhyw ran o'r Prif Ddatblygiad a gymeradwywyd hyd nes y bydd isadeiledd y ffordd a gymeradwywyd dan yr amod hwn wedi ei gwblhau er boddhad yr Awdurdod Cynllunio Lleol a rhaid ei gadw felly wedi hynny.

Rheswm: Er mwyn sicrhau bod mynedfa ddigonol i gerbydau a'u symudiadau a hynny er lles diogelwch y briffordd.

(10) Fel rhan o unrhyw gais materion wrth gefn, rhaid cyflwyno manylion am y cyfleusterau cerbydau danfon, storio sbwriel a phethau ailgylchadwy a pharcio a throi i'r Awdurdod Cynllunio Lleol a derbyn ei ganiatad ac ni chaniateir defnyddio na byw mewn unrhyw ran o'r Prif Ddatblygiad fydd wedi ei gymeradwyo hyd nes y bydd y cyfleusterau angenrheidiol wedi eu cwblhau a'u marcio allan er boddhad yr Awdurdod Cynllunio Lleol. Rhaid cadw'r mannau datblygu wedi hynny yn glir o rwystrau a pheri eu bod ar gael ar gyfer danfon a throi.

Rheswm: Er mwyn sicrhau cyfleusterau digonol ar gyfer parcio cerbydau danfon a throi o fewn cwrtill y safle, er lles diogelwch y briffordd.

(11) Fel rhan o'r cais mewn perthynas â'r materion

the written agreement of the local planning authority is received confirming completion of the preceding phase. The schedule of development shall be implemented in all respects as approved by this condition unless firstly otherwise agreed in writing by the Local Planning Authority.

Reason: To facilitate a phased scheme of development in accordance with a pre-agreed schedule.

(07) The approved development shall relate to those details as submitted by AXIS P E D Ltd to the Local Planning authority dated December 2010 as amended.

Reason: In the interest of clarity.

(08) Prior to the Main Development (or any part thereof) being brought into operation a scheme for the phasing of the Black Bridge traffic signals shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To maintain the safety and free flow of traffic on the trunk road.

(09) As part of any reserved matters submission, full details of the layout and design of site accesses (including vehicular and pedestrian), internal access and circulation areas shall be submitted to and approved by the Local Planning Authority and that part of the approved Main Development shall not be used or occupied until the road infrastructure approved under this condition has been completed to the satisfaction of the Local Planning Authority and which shall be retained as such thereafter.

Reason: To ensure an adequate vehicular access and movement in the interests of highway safety.

(10) As part of any reserved matters application, details of delivery vehicle facilities, refuse and recyclables storage and parking and turning shall be submitted to and approved by the Local Planning Authority and that part of the approved Main Development shall not be used or occupied until the required facilities have been completed and marked out to the satisfaction of the Local Planning Authority. The delivery areas shall thereafter be kept clear of obstruction and made available for delivery and turning.

Reason: To ensure adequate facilities for delivery vehicle parking and turning within the curtilage of the site, in the interests of highway safety.

(11) As part of the reserved matters

gefn ar gyfer pob rhan o'r Prif Ddatblygiad, rhaid cyflwyno manylion am y cyfleusterau parcio ceir a beiciau modur i'r Awdurdod Cynllunio Lleol a derbyn ei ganiatad a chyn defnyddio'r datblygiad arfaethedig neu ran ohono rhaid i'r lle parcio fod wedi ei gwblhau ym mhob agwedd fel sydd wedi ei gymeradwyo dan yr amod hon a'i gynnal a'i gadw wedi hynny yn rhydd o rhwystrau a rhaid iddo fod ar gael fel y cafodd ei gymeradwyo wedi hynny.

Rheswm: I sicrhau darpariaeth ac argaeledd digonol o lefydd parcio cerbydau.

(12) Fel rhan o unrhyw gais materion wrth gefn rhaid cyflwyno manylion am rwydwaith beicio / llwybr troed integredig (i gynnwys Llwybr Arfordirol Ynys Môn) trwy bob rhan o safle'r Prif Ddatblygiad i'r Awdurdod Cynllunio Lleol a derbyn ei ganiatad a chyn bod neb yn byw neu'n defnyddio'r datblygiad arfaethedig neu ran ohono, rhaid i'r llwybrau fod wedi eu cwblhau fel a gymeradwywyd dan yr amod hwn a rhaid eu cynnal a'u cadw'n rhydd o rwystrau a pheri eu bod ar gael fel y cawsant eu cymeradwyo wedi hynny.

Rheswm: Er lles datblygiad cynaliadwy.

(13) Fel rhan o'r cais materion wrth gefn ar gyfer pob rhan o'r Prif Ddatblygiad, rhaid cyflwyno i'r Awdurdod Cynllunio Lleol fanylion am gyfleusterau diogel dan orchudd ar gyfer parcio beics a derbyn ei ganiatad a chyn defnyddio'r datblygiad arfaethedig neu ran ohono rhaid i'r lle parcio beics fod wedi ei gwblhau ym mhob agwedd fel y cafodd ei gymeradwyo o dan yr amod hwn a rhaid ei gynnal a'i gadw wedi hynny yn rhydd o rwystrau a pheri ei fod ar gael fel y cafodd ei gymeradwyo.

Rheswm: I sicrhau darpariaeth ddigonol a bod lle ar gyfer parcio beics.

(14) Fel rhan o'r cais/ceisiadau materion wrth gefn rhaid cyflwyno manylion am gynllun teithio yn nodi:

- ☐ Cynigion i annog ymwelwyr, staff a chontractwyr i deithio i'r safle ac oddi yno trwy ddulliau amgen o deithio yn hytrach na defnyddio car preifat gydag un person ynddo.
- ☐ Amserlen ar gyfer gweithredu hynny

a rhaid eu cyflwyno i'r Awdurdod Cynllunio Lleol a derbyn ei ganiatad ysgrifenedig. Rhaid gweithredu'r cynllun teithio yn ei holl agweddau fel y cafodd ei gymeradwyo dan yr amod hwn a rhaid iddo, i'r graddau y bydd angen hynny dan y cynllun teithio fydd wedi ei gymeradwyo, gael ei weithredu'n egniol a'i esblygu wedi hynny.

application, for each part of the Main Development, details of car and motorcycle parking facilities shall be submitted to and approved by the Local Planning Authority and prior to occupation of the proposed development or part thereof the parking shall be completed in all respects as approved under this condition and shall be retained and kept free of obstructions and available as approved thereafter.

Reason: To ensure adequate provision and availability of vehicle parking.

(12) As part of any reserved matters application details of an integrated cycle/footway network (to include the Isle of Anglesey Coastal Path) through each part of the Main Development site shall be submitted to and approved by the Local Planning Authority and prior to occupation of the proposed development or part thereof the routes shall be completed in all respects as approved under this condition and shall be retained and kept free of obstructions and available as approved thereafter.

Reason: In the interests of sustainable development.

(13) As part of the reserved matters application, for each part of the Main Development, details of secure and covered cycle parking facilities shall be submitted to and approved by the Local Planning Authority and prior to occupation of the proposed development or part thereof the cycle parking shall be completed in all respects as approved under this condition and shall be retained and kept free of obstructions and available as approved thereafter.

Reason: To ensure adequate provision and availability of cycle parking.

(14) As part of the reserved matters application(s) details of a travel plan setting out:

- ☐ Proposals to encourage visitors, staff and contractors to travel to and from the site by alternative means of travel to single occupancy private car,
- ☐ a timetable for implementation,

shall be submitted to and approved in writing by the Local Planning Authority. The travel plan shall be implemented in all respects as approved under this condition and shall in so far as required by the approved travel plan be actively implemented and evolved thereafter.

Rheswm: Er lles datblygu cynaliadwy.

(15) Ni chaniateir dechrau'r 'Gwaith Rhagarweiniol Galluogi, Mynediad ac Isadeiledd hyd nes y bydd Cynllun Rheoli Amgylcheddol cynhwysfawr ar gyfer adeiladu'r datblygiad wedi ei gyflwyno i'r Awdurdod Cynllunio Lleol ac wedi derbyn ei ganiatâd ysgrifenedig. Rhaid i'r cynllun nodi'r holl effeithiau niweidiol posibl a rhagweladwy ar ddeiliaid cyfagos a'r amgylchedd yn cynnwys safleoedd cadwraeth natur dynodedig sydd gerllaw trwy ollwng difwynwyr i'r awyr a'r dŵr yn codi o adeiladu'r datblygiad gan nodi sut y byddir yn osgoi hyn, neu lle nad yw hynny'n ymarferol, ei liniaru. Rhaid i'r holl weithgareddau adeiladu ar y safle gael eu gwneud yn unol â'r cynllun fydd wedi ei gymeradwyo, yn amodol ar unrhyw newidiadau y cytunir arnynt yn ysgrifenedig gan yr Awdurdod Cynllunio Lleol.

Rheswm: Er mwyn sicrhau datblygiad boddhaol.

(16) Cyn dechrau'r 'Gwaith Rhagarweiniol Galluogi, Mynediad ac Isadeiledd' rhaid cytuno Cynllun Rheoli Traffig Cyfnod Adeiladu yn manylu ar :

- ☐ Ganlyniadau ymchwiliad yn asesu defnyddio'r môr ac/neu reilffordd i ddarparu dulliau o gludo peiriannau, offer a deunyddiau sy'n gysylltiedig ag adeiladu'r datblygiad fydd yn ymarferol, yn economaidd ac yn amgylcheddol fanteisiol (o'i gymharu â chludo ar y ffordd) a phe bai'r ymchwiliad yn nodi y gellir defnyddio'r môr neu'r rheilffordd i'r diben hwnnw, rhaid darparu cynllun manwl.
- ☐ Llwybr/llwybrau cludo ac unrhyw arwyddion dros dro i'w darparu.
- ☐ Strategaeth gyfeirio a gweithdrefnau ar gyfer rhybuddio a chludo llwythi anwahanadwy 'y tu allan i fesur' i gynnwys mesurau ar gyfer amddiffyn dros dro wynebau cerbydlonydd, peiriannau ac offer ymgwymerwyr statudol a symud unrhyw ddodrefn stryd.
- ☐ Trefniadau ar gyfer parcio ar y stryd i rai sy'n gweithio ar y safle ac i ymwelwyr a rhai'n danfon pethau.
- ☐ Cynigion ar gyfer cyfathrebu gwybodaeth yn ymwneud â'r uchod i'r Cyngor.

Reason: In the interests of sustainable development.

(15) The 'Preliminary Enabling, Access and Infrastructure Works shall not commence until a comprehensive Environmental Management Plan for the construction of the development has been submitted to and agreed in writing by the Local Planning Authority. The plan shall identify all possible and foreseeable detrimental effects on neighbouring occupiers and the environment including adjacent designated nature conservation sites through release of contaminants to air and water arising from construction of the development and specify how these are to be avoided or, where this is not practicable, mitigated. All construction activities on the site shall be undertaken in accordance with the approved plan, subject to any amendments agreed in writing by the Local Planning Authority.

Reason: In order to secure the satisfactory development of the site.

(16) Prior to the commencement of 'Preliminary Enabling, Access and Infrastructure Works, a Construction Phase Traffic Management Plan shall be agreed detailing:

- ☐ Results of an investigation assessing the utilisation of sea and/or rail to provide a practical, economical and environmentally advantageous (when compared and contrasted with road transportation) means of transportation of plant, equipment and materials associated with the construction of the development and, in the event that the investigation identifies that sea or rail could be so utilised a detailed scheme shall be provided.
- ☐ Haul route(s) and any temporary signage to be provided.
- ☐ Routing strategy and procedures for the notification and conveyance of indivisible 'out of gauge' loads to include measures for the temporary protection of carriageway surfaces, statutory undertakers' plant and equipment and removal of street furniture.
- ☐ Arrangements for on-street parking for personnel working on site and for visitors and deliveries.
- ☐ Proposals for communicating information relating to the above to the Council.

Ni chaniateir altro'r cynllun hwn fydd wedi ei gytuno heb gael cytundeb blaenorol ac ysgrifenedig yr Awdurdod Cynllunio Lleol.

Rheswm: Er budd diogelwch y briffordd.

(17) Cyn dechrau'r 'Gwaith Rhagarweiniol Galluogi, Mynediad ac Isadeiledd' rhaid cytuno darpariaeth cyfleusterau golchi olwynion o fewn cwrtil safle'r cais gyda'r Awdurdod Cynllunio Lleol. Rhaid defnyddio'r cyfleusterau golchi olwynion a'i gynnal a'i gadw mewn cyflwr gweithio da trwy gyfnod y gwaith adeiladu ac am gyn hired wedi hynny ac y bydd yn cael ei ystyried yn angenrheidiol gan yr Awdurdod Cynllunio Lleol.

Rheswm: I rwystro i fwd gael ei adael ar y ffordd yn deillio o'r gwaith adeiladu a hynny'n groes i les diogelwch y briffordd.

(18) Ni chaniatier i'r 'Gwaith Rhagarweiniol Galluogi, Mynediad ac Isadeiledd' ddechrau hyd nes y bydd cynllun rheoli sŵn wedi ei gyflwyno i'r Awdurdod Cynllunio Lleol ac wedi derbyn ei ganiatâd ysgrifenedig. Rhaid i'r Cynllun hwn nodi trefniadau ar gyfer monitro sŵn yn ystod adeiladu'r datblygiad, yn cynnwys yr union leoliadau mesur o'r lle y bydd y sŵn yn cael ei fonitro, y dulliau o fesur y sŵn, y gweithdrefnau ar gyfer delio ag unrhyw gwynion a dderbyniwyd ynglŷn â sŵn a dirgrynu, a'r trefniadau ar gyfer gwneud i ganlyniadau'r monitro sŵn fod ar gael i'r Awdurdod Cynllunio Lleol. Rhaid i ddarpariaethau'r cynllun gael eu gweithredu trwy gydol cyfnod adeiladu'r datblygiad, yn amodol ar unrhyw newidiadau fydd wedi eu cytuno'n ysgrifenedig gyda'r Awdurdod Cynllunio Lleol.

Rheswm: Er mwyn sicrhau bod y safle'n cael ei ddatblygu'n foddhaol.

(19) Ni chaniateir dechrau'r prif ddatblygiad nac unrhyw ran ohono hyd nes bo cynllun yn nodi manylion am y goleuadau artiffisial allanol y bwriedir eu codi ar y safle yn ystod gwaith adeiladu'r Prif Ddatblygiad wedi ei gyflwyno i'r Awdurdod Cynllunio Lleol ac wedi derbyn ei ganiatâd ysgrifenedig. Rhaid i'r cynllun hwn nodi lleoliad, uchder, math a chyfeiriad y goleuadau arfaethedig. Ni chaniateir gosod a gweithredu goleuadau i bwrpasau adeiladu ar safle'r cais ond yn unol â'r cynllun fydd wedi ei gymeradwyo, yn amodol ar unrhyw newidiadau y cytunir arnynt yn ysgrifenedig gan yr Awdurdod Cynllunio Lleol.

Rheswm: Er budd mwynderau.

(20) Rhaid i'r gwaith adeiladu gael ei wneud o fewn troedbrint y datblygiad. Lle nad yw hyn yn bosibl, fel

No alterations to this agreed scheme shall be made without the prior agreement in writing of the Local Planning Authority.

Reason: In the interests of highway safety.

(17) Prior to the commencement of 'Preliminary Enabling, Access and Infrastructure Works wheel washing facilities shall be provided within the curtilage of the application site as agreed with of the Local Planning Authority. The wheel washing facilities shall be used and maintained in good working condition throughout the construction works and for as long afterwards as considered necessary by the Local planning Authority.

Reason: To prevent the development works resulting in mud on the road contrary to the interests of highway safety.

(18) The 'Preliminary Enabling, Access and Infrastructure Works shall not commence until a noise management plan has been submitted to and approved in writing by the Local Planning Authority. This Plan shall specify arrangements for monitoring noise during the construction of the development, including the exact measurement locations from which noise will be monitored, the methods of noise measurement, the procedures for dealing with any complaints received regarding noise and vibration, and the arrangements for making noise monitoring results available to the Local Planning Authority. The provisions of the plan shall be implemented throughout the construction of the development, subject to any amendments agreed in writing by the Local Planning Authority.

Reason: In order to secure the satisfactory development of the site.

(19) The Main Development or any part thereof shall not commence until a scheme setting out details of the external artificial lighting proposed on the site during the construction of the Main Development has been submitted to and approved in writing by the Local Planning Authority. This scheme shall identify the location, height, type and orientation of the proposed lighting. Lighting for construction purposes shall only be installed and operated on the application site in accordance with the approved scheme, subject to any amendments agreed in writing by the Local Planning Authority.

Reason: In the interests of amenity

(20) Construction works shall be carried out from within the footprint of the development.

bydd wedi ei nodi yn yr Datganiad Amgylcheddol, rhaid cadw unrhyw styrbans a niwed i wely'r môr ger yr ardal ddatblygu ac a fydd yn digwydd o ganlyniad i'r gwaith adeiladu, i'r lefel isaf bosibl.

Rheswm: Er mwyn osgoi effeithiau ar y blaendraeth cyfagos.

(21) Cyn dechrau'r Gwaith Rhagarweiniol, Galluogi, Mynediad ac Isadeiledd rhaid cyflwyno manylion am y lefelau llawr gorffenedig arfaethedig a lefelau safle'r datblygiad arfaethedig i'r Awdurdod Cynllunio Lleol a derbyn ei ganiatâd ysgrifenedig. Rhaid gosod lefel y llwyfan datblygu yn uwch na digwyddiad llifogydd arfordirol critigol (1 mewn 200 cyfnod dychwelyd 100 mlynedd o newid hinsawdd).

Rheswm: Er budd diogelu'r safle rhag risg gynyddol o lifogydd.

(22) Cyn dechrau'r Gwaith Rhagarweiniol, Galluogi, Mynediad ac Isadeiledd rhaid cyflwyno manylion am y waliau môr newydd fydd yn ffryntio ac yn gyfagos i'r safle i'r Awdurdod Cynllunio Lleol a derbyn ei ganiatâd ysgrifenedig. Rhaid i'r manylion sydd i'w cyflwyno gynnwys maint waliau'r môr, eu lleoliad, deunyddiau, strwythur ac uchder.

Rheswm: Er budd diogelu'r ardal leol rhag risg gynyddol o lifogydd.

(23) Rhaid cyflwyno manylion am y wal barapet, y dull adeiladu ac uchder y grib i'r Awdurdod Cynllunio Lleol a derbyn ei ganiatâd ysgrifenedig a rhaid gwneud y gwaith yn unol â'r manylion fydd wedi eu darparu.

Rheswm: I sicrhau y gellir cyfyngu ar y tonnau sy'n dod dros y wal i ddiogelu'r datblygiad rhag llifogydd.

(24) Fel rhan o unrhyw gyflwyniad ar y materion wrth gefn rhaid cyflwyno manylion am y mesurau i gadw dŵr allan i atal llifogydd mewn unrhyw eiddo sy'n is na lefel y llawr i'r Awdurdod Cynllunio Lleol a derbyn ei ganiatâd ysgrifenedig a rhaid i'r gwaith gael ei wneud yn unol â'r manylion fydd wedi eu darparu.

Rheswm: I ddiogelu'r datblygiad rhag llifogydd.

(25) Cyn dechrau'r Gwaith Rhagarweiniol, Galluogi, Mynediad ac Isadeiledd rhaid cyflwyno manylion am y system draenio dŵr wyneb arfaethedig i'r Awdurdod Cynllunio Lleol a derbyn ei ganiatâd ysgrifenedig. Rhaid i'r manylion hyn gynnwys manylion fflap a falf a'u lleoliadau, yr arllwysfeydd presennol ac arfaethedig a'u lleoliadau a chynlluniau cynnal a

Where this is not possible, as specified within the Environmental Statement, any disturbance and damage to the sea bed adjacent to the development area that occurs as a result of the construction shall be kept to the minimum necessary.

Reason: In order to avoid impacts on the adjacent foreshore.

(21) Prior to commencement of the Preliminary, Enabling, Access and Infrastructure Works details of the proposed finished floor levels and site levels of the proposed development shall be submitted to and agreed in writing with the Local Planning Authority. The development platform level shall be set above the critical coastal flood event (1 in 200 return period 100 years of climate change).

Reason: In the interest of protecting the site from the increased risk of flooding.

(22) Prior to commencement of the Preliminary, Enabling, Access and Infrastructure Works details of the new sea walls fronting and adjoining the site shall be submitted to and agreed in writing with the Local Planning Authority. Details to be submitted shall include the extent of the sea walls; their location; materials, structure and height.

Reason: In the interest of protecting the local area from increased risk of flooding.

(23) Parapet wall details, construction type and crest height shall be submitted to and approved in writing by the Local Planning Authority and shall be carried out in accordance with the details provided.

Reason: To ensure that wave topping is limited to safeguard the development from flooding.

(24) As part of any reserved matters submission details of water exclusion measures to prevent the flooding of any below ground accommodation shall be submitted to and approved in writing by the Local Planning Authority and shall be carried out in accordance with the details provided.

Reason: To safeguard the proposal from flooding.

(25) Prior to commencement of the Preliminary, Enabling, Access and Infrastructure Works details of the proposed surface water drainage system shall be submitted to and agreed in writing with the Local Planning Authority. These details shall include flap and valve specifications and their

chadw a rheoli priodol ar gyfer y systemau draenio.

Rheswm: Er mwyn diogelu cyfanrwydd y system ddraenio leol ac i ddarparu systemau draenio digonol i allu delio â'r datblygiad newydd arfaethedig.

(26) Cyn dechrau'r Gwaith Rhagarweiniol, Galluogi, Mynediad ac Isadeiledd rhaid cyflwyno cynllun cynhwysfawr ar gyfer dylunio prif gyflenwad dŵr newydd oddi ar y safle i wasanaethu'r datblygiad i'r Awdurdod Cynllunio Lleol a derbyn ei ganiatâd ysgrifenedig. Rhaid i'r cynllun fydd wedi ei gymeradwyo gael ei wneud yn unol â'r manylion fydd wedi eu darparu ac ni chaniateir i unrhyw un ddefnyddio unrhyw adeilad ar y safle er eu lles hyd nes y bo'r cynllun y cytunwyd arno wedi ei gwblhau.

Rheswm: I ddiogelu cyfanrwydd y system gyhoeddus ar gyfer cyflenwi dŵr.

(27) Rhaid draenio arllwysfeydd dŵr budr a dŵr wyneb o'r safle ar wahân.

Rheswm: Er mwyn diogelu cyfarwydd y system garthffosiaeth gyhoeddus.

(28) Ni chaniateir i unrhyw ddŵr wyneb gysylltu, naill ai'n uniongyrchol neu'n anuniongyrchol i'r system garthffosiaeth gyhoeddus oni bai y bydd Awdurdod Cynllunio Lleol yn rhoi ei ganiatâd ysgrifenedig fel arall.

Rheswm: I osgoi gorlwythiad hydrolig y system garthffosiaeth gyhoeddus, i ddiogelu iechyd a diogelwch y preswylwyr cyfredol ac i sicrhau na fydd unrhyw niwed i'r amgylchedd.

(29) Ni chaniateir i ddŵr redeg oddi ar y tir naill ai'n uniongyrchol neu'n anuniongyrchol i'r system garthffosiaeth gyhoeddus.

Rheswm: I osgoi gorlwytho hydrolig y system garthffosiaeth gyhoeddus a llygru'r amgylchedd.

(30) Rhaid i unrhyw gynnydd mewn llif dŵr wyneb gael ei deneuo er boddhad yr Awdurdod Cynllunio Lleol.

Rheswm: I osgoi gorlwytho a llifogydd o fewn y system bresennol ac i atal llygru dŵr wyneb a dyfrgyrsiau.

(31) Cyn dechrau'r Gwaith Rhagarweiniol, Galluogi, Mynediad ac Isadeiledd, bydd cynllun ar gyfer draenio'r safle mewn ffordd gynhwysfawr ac integredig yn dangos sut y byddir yn delio â dŵr budr, dŵr wyneb a dŵr tir yn cael ei baratoi ar gyfer yr

locations; the existing & proposed outfall system and their locations and appropriate maintenance and management schemes for the drainage systems.

Reason: To protect the integrity of the local drainage system and to provide adequate drainage systems to cater for the proposed new development.

(26) Prior to the commencement of 'Preliminary Enabling, Access and Infrastructure Works' a comprehensive scheme for the design of a new off-site water-mains to service the development shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in accordance with the details provided and there shall be no beneficial occupation of any building on the site until the agreed scheme has been completed.

Reason: To protect the integrity of the public water supply system.

(27) Foul water and surface water discharges shall be drained separately from the site.

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

(28) 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.

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

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

(30) Any increase in surface water flows shall be attenuated to the satisfaction of the Local Planning Authority.

Reason: To prevent surcharging and flooding of the existing system and to prevent the pollution of surface water and watercourses.

(31) Prior to the commencement of 'Preliminary Enabling, Access and Infrastructure Works' a scheme for the comprehensive and integrated drainage of the site showing how foul water, surface water and

Awdurdod Cynllunio Lleol a derbyn ei ganiatâd ysgrifenedig a rhaid gwneud hynny wedyn yn hollol unol â'r manylion fydd wedi eu darparu.

Rheswm: Er mwyn sicrhau bod cyfleusterau draenio effeithiol yn cael eu darparu ac na fydd unrhyw effeithiau niweidiol yn digwydd i'r amgylchedd nac i'r system garthffosiaeth gyhoeddus bresennol.

(32) Lle bo'r datblygiad yn cynnwys lle paratoi bwyd poeth, rhaid darparu trapiau sain addas i osgoi i bethau fynd i mewn i'r system garthffosiaeth gyhoeddus fyddai'n debygol o darfu ar lif rhydd cynnwys y garthffosiaeth, neu bethau a fyddai'n cael effaith niweidiol ar drin a chael gwared o gynhwysion o'r fath.

Rheswm: Er mwyn diogelu cyfanrwydd ysystem garthffosiaeth gyhoeddus ac i sicrhau gwasanaeth hanfodol ac effeithiol i'r preswylwyr cyfredol.

(33) Cyn y Gwaith Rhagarweiniol, Galluogi, Mynediad ac Isadeiledd a ganiateir yma (neu unrhyw ddyddiad neu gyfnod arall yn y datblygiad fydd wedi ei gytuno yn ysgrifenedig gyda'r Awdurdod Cynllunio Lleol), rhaid cyflwyno cynllun i ddelio â'r risgiau sy'n gysylltiedig â heintio'r safle i'r Awdurdod Cynllunio Lleol a derbyn ei ganiatâd ysgrifenedig. Rhaid i'r cynllun hwnnw gynnwys y cwbl o'r elfennau canlynol oni bai iddynt gael eu heithrio'n benodol, yn ysgrifenedig, gan yr Awdurdod Cynllunio Lleol.

1. Asesiad risg Rhagarweiniol yn nodi:-

- Yr holl ddefnyddiau blaenorol
- Difwynwyr tebygol sy'n gysylltiedig â'r defnyddiau hynny
- Model syniadol o'r safle yn nodi ffynonellau, llwybrau a derbynyddion.
- risgiau annerbyniol posib yn codi o lygredd yn y safle.

2. Cynllun archwilio safle, yn seiliedig ar yr asesiad risg cychwynnol (1), yn darparu gwybodaeth am asesiad manwl o'r risg i'r holl dderbynyddion a all gael eu heffeithio, gan gynnwys y rheini sydd oddi ar y safle.

3. Canlyniadau'r archwiliad safle a'r asesiad risg manwl (2) ac yn seiliedig ar y canlyniadau hynny'n rhoi manylion llawn am y mesurau adfer y byddir eu hangen a sut y byddant yn cael eu gweithredu.

4. Cynllun gwirio yn rhoi manylion am y data a gesglir er mwyn dangos bod y gwaith a amlinellir yn (3) wedi ei gwblhau ac yn nodi unrhyw ofynion ar gyfer monitro tymor hir ynghylch cysylltiadau llygredd, gwaith cynnal a threfniadau ar gyfer cymryd camau petai raid.

land drainage will be dealt with shall be prepared and approved in writing by the Local Planning Authority and shall be carried out in accordance with the details provided.

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

(32) Where development consists of hot food preparation suitable grease traps shall be provided to prevent entry into the public sewerage system of matter likely to interfere with the free flow of the sewer contents, or which would prejudicially affect the treatment and disposal of such contents.

Reason: To protect the integrity of the public sewerage system, and sustain an essential and effective service to existing residents.

(33) Prior to the Preliminary, Enabling, Access and Infrastructure Works approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), a scheme to deal with the risks associated with contamination of the site shall be submitted to and approved, in writing, by the Local Planning Authority. That scheme shall include all of the following elements unless specifically excluded, in writing, by the Local Planning Authority.

1. A preliminary risk assessment identifying:

- all previous uses
- potential contaminants associated with those uses
- a conceptual model of the site indicating sources, pathways and receptors
- potentially unacceptable risks arising from contamination at the site

2. A site investigation scheme, based on the preliminary risk assessment (1), to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.

3. The results of the site investigation and detailed risk assessment (2) and based on those results giving full details of the remediation measures required and how they are to be undertaken.

4. A verification plan providing details of the data that will be collected in order to demonstrate that works set out in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for

Mae angen caniatâd yr Awdurdod Cynllunio Lleol i wneud unrhyw newidiadau i'r elfennau hyn y cytunwyd arnynt.

Rheswm: Sicrhau na fydd y datblygiad arfaethedig yn llygru dyfroedd a reolir.

(34) Cyn cychwyn ar y Prif Ddatblygiad, bydd raid cyflwyno i'r Awdurdod Cynllunio Lleol, i'w gymeradwyo'n ysgrifenedig ganddo, adroddiad gwirio yn dangos bod y gwaith a nodir yn y strategaeth adfer wedi ei gwblhau ac yn dangos effeithiolrwydd y camau adfer. Bydd raid i'r adroddiad gynnwys manylion am waith samplu a monitro a wnaed yn unol â'r cynllun gwirio a gymeradwywyd i ddangos bod y meini prawf ar gyfer adfer y safle wedi eu bodloni. Bydd raid iddo gynnwys hefyd unrhyw gynllun (cynllun cynnal a monitro tymor hir) ar gyfer monitro cysylltiadau llygredd yn y tymor hir, ynghyd â gwaith cynnal a threfniadau ar gyfer cymryd camau petai raid fel sydd wedi ei nodi yn y cynllun gwirio, ac ar gyfer adrodd ar y materion hyn i'r Awdurdod Cynllunio Lleol.

Rheswm: Dangos bod yr holl feini prawf adfer mewn perthynas â dyfroedd a reolir wedi eu bodloni.

(35) Bydd raid cyflwyno adroddiadau ar waith monitro, gwaith cynnal ac unrhyw gamau a gymerwyd yn unol â chynllun cynnal a monitro tymor hir i'r Awdurdod Cynllunio Lleol fel sydd wedi ei nodi yn y cynllun hwnnw. Ar ôl cwblhau'r rhaglen fonitro bydd raid cyflwyno i'r Awdurdod Cynllunio Lleol i'w gymeradwyo ganddo, adroddiad terfynol yn dangos bod yr holl feini prawf tymor hir ar gyfer adfer y safle wedi eu bodloni ac yn cofnodi'r penderfyniad i roi'r gorau i fonitro.

Rheswm: Dangos bod yr holl feini prawf adfer mewn perthynas â dyfroedd a reolir wedi eu bodloni. Byd hyn yn sicrhau nad oes unrhyw risgiau annerbyniol mwyach i ddyfroedd a reolir yn dilyn adfer y safle.

(36) Yn ystod y gwaith datblygu, os gwelir bod llygredd ar y safle na sylwyd arno'n flaenorol, yna ni chaniateir gwneud unrhyw waith datblygu pellach ar y safle (ac eithrio lle cytunwyd yn ysgrifenedig gyda'r Awdurdod Cynllunio Lleol) nes y bydd unrhyw newid i'r Datganiad Dull yn dweud sut y byddir yn ymdrin â'r llygredd hwn wedi ei gyflwyno i'r Awdurdod Cynllunio Lleol a'i gymeradwyo'n ysgrifenedig ganddo.

Rheswm: Sicrhau na fydd y datblygiad arfaethedig yn llygru dyfroedd a reolir.

contingency action.

Any changes to these agreed elements require the express consent of the Local Planning Authority.

Reason: To ensure that the proposed development will not cause pollution of controlled waters.

(34) Prior to commencement of the Main Development, a verification report demonstrating completion of the works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved in writing by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a long-term monitoring and maintenance plan) for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan, and for the reporting of this to the Local Planning Authority.

Reason: To demonstrate that the remediation criteria relating to controlled waters have been met.

(35) Reports on monitoring, maintenance and any contingency action carried out in accordance with a long-term monitoring and maintenance plan shall be submitted to the Local Planning Authority as set out in that plan. On completion of the monitoring programme a final report demonstrating that all long-term site remediation criteria have been met and documenting the decision to cease monitoring shall be submitted to and approved in writing by the local planning authority.

Reason: To ensure that longer term remediation criteria relating to controlled waters have been met. This will ensure that there are no longer remaining unacceptable risks to controlled waters following remediation of the site.

(36) If, during development, contamination not previously identified is found to be present at the application site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out and any amendment to the Method Statement detailing how this unsuspected contamination shall be dealt with has been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that the proposed development will not cause pollution of controlled waters.

(37) Cyn cychwyn ar unrhyw waith treiddiol i osod colofnau cynnal neu unrhyw sylfeini eraill, dylid cyflwyno manylion i'r Awdurdod Cynllunio Lleol i ddangos nad ydynt yn achosi unrhyw risg annerbyniol i ddŵr daear a bydd raid cael cymeradwyaeth ysgrifenedig ar gyfer y fath wybodaeth.

Rheswm: Sicrhau nad yw'r amgylchedd dŵr yn cael ei lygru.

(38) Cyn iddo arllwys i unrhyw gwrs dŵr neu garthffos ar gyfer dŵr wyneb, bydd raid i'r holl ddŵr wyneb sy'n draenio o'r ardaloedd parcio a'r llecynnau caled fynd trwy seiffon olew sydd wedi ei ddylunio a'i adeiladu i fod â chapasiti sy'n addas ar gyfer y safle sy'n cael ei ddraenio. Ni ddylai dŵr o'r to basio trwy'r seiffon a bydd raid cysylltu peipiau draenio i'r system ddraenio un ai yn uniongyrchol neu trwy gafnau cefn ac arnynt blatiau selio yn hytrach na rhwyllau agored.

Rheswm: Sicrhau nad yw'r amgylchedd dŵr yn cael ei lygru.

(39) Cyn cychwyn defnyddio'r iard gychod arfaethedig, bydd raid cyflwyno manylion am fesurau a weithredir i sicrhau na fydd y marina arfaethedig yn cael ei lygru a bydd raid i'r Awdurdod Cynllunio Lleol gymeradwyo'r fath fanylion yn ysgrifenedig.

Rheswm: Er mwyn osgoi effaith ar y blaendraeth a'r amgylchedd morol.

(40) Cyn cychwyn ar unrhyw waith carthu bydd raid cyflwyno cynllun carthu i'r Awdurdod Cynllunio Lleol i'w gymeradwyo'n ysgrifenedig ganddo. Bydd rhaid cael gwared ar unrhyw ddefnydd a fydd yn cael ei garthu yn y safle drwyddedig y cytunwyd arno fel sy'n briodol ar gyfer maint y deunydd.

Rheswm: Er mwyn osgoi effaith ar yr amgylchedd arfordol.

(41) Cyn cychwyn gwneud deunydd o'r Marina bydd raid cyflwyno i'r Awdurdod Cynllunio Lleol, i'w gymeradwyo'n ysgrifenedig ganddo, raglen reoli ar gyfer delio gyda malurion (gan gynnwys malurion islanwol) yn sgil unrhyw bysgota a all ddigwydd oddi ar brif lan y datblygiad.

Rheswm: Er mwyn osgoi effaith ar yr amgylchedd morol.

(42) Cyn gwneud defnydd o unrhyw ran o'r Prif Ddatblygiad, bydd raid cyflwyno i'r Awdurdod Cynllunio Lleol i'w gymeradwyo'n ysgrifenedig ganddo, gynllun rheoli i sicrhau rheolaeth ddigonol o sbwriel o fewn y Prif Ddatblygiad a'r sbwriel sy'n tarddu ohono.

(37) Prior to the commencement of piling or any other foundation designs using penetrative methods details should be submitted to the Local Planning Authority to demonstrate that there is no resultant unacceptable risk to groundwater and such information shall be approved in writing.

Reason: To prevent pollution of the water environment.

(38) Prior to being discharged into any watercourse or surface water sewer, all surface water drainage from parking areas and hard-standings shall be passed through an oil interceptor designed and constructed to have a capacity and details compatible with the site being drained. Roof water shall not pass through the interceptor and drainpipes shall be connected to the drainage system either directly or by means of back inlet gullies provided with sealing plates instead of open gratings.

Reason: To prevent pollution of the water environment.

(39) Prior to the bringing into use of the proposed boatyard, details of measures to avoid contamination of the proposed marina shall be submitted to and agreed in writing with the Local Planning Authority.

Reason: In order to avoid impacts on the adjacent foreshore and marine environment.

(40) Prior to any maintenance dredging, a maintenance dredging plan shall be submitted to and agreed in writing with the Local Planning Authority. Any dredging material shall be disposed of at the agreed and licensed offshore site appropriate for the size of the material.

Reason: In order to avoid impacts on the marine environment.

(41) Prior to the bringing into use of the Marina a control programme for dealing with debris (including sub-tidal) from angling that may occur off the main waterfront of the development shall be submitted to and agreed in writing with the Local Planning Authority.

Reason: In order to avoid impacts on the marine environment.

(42) Prior to the bringing into use of any part of the Main Development, a management regime to ensure adequate control of litter within and originating from the Main Development shall be submitted to and agreed in writing with the Local Planning Authority.

Rheswm: Er mwyn osgoi effaith ar fwynderau ac atal llygredd i'r amgylchedd dyfrol.

(43) Cyn cychwyn defnyddio'r Marina bydd raid cyflwyno i'r Awdurdod Cynllunio Lleol i'w gymeradwyo'n ysgrifenedig ganddo, Gôd Ymarfer Amgylcheddol ar gyfer glanhau cychod i bawb sy'n defnyddio cychod.

Rheswm: Sicrhau nad yw'r amgylchedd morol yn cael ei lygru.

(44) Bydd raid cael cytundeb ysgrifenedig yr Awdurdod Cynllunio Lleol i fanylion unrhyw oleuadau artiffisial allanol y bwriedir eu defnyddio ar y safle yn ystod cyfnod gweithredol y Prif Ddatblygiad, neu unrhyw ran ohono, cyn iddynt gael eu gosod.

Rheswm: Er budd mwynderau.

(45) Ni chaniateir i unrhyw ddatblygiad ddigwydd hyd nes y bydd yr ymgeisydd, neu ei asiant neu ei olynwyr mewn teitl, wedi cyflwyno a sicrhau rhaglen o werthuso ac asesu archeolegol a gymeradwywyd yn ysgrifenedig gan yr Awdurdod Cynllunio Lleol. Bydd raid gweithredu pob agwedd ar y rhaglen y cytunwyd arni yn unol â'r amod hwn ac eithrio lle cytunwyd fel arall yn ysgrifenedig gyda'r Awdurdod Cynllunio Lleol.

Rheswm: Diogelu diddordebau amgylchedd hanesyddol tra'n sicrhau'r datblygiad.

(46) Cyn cychwyn 'Gwaith Galluogi, Mynediad ac Isadeiledd Cychwynnol' bydd raid cyflwyno i'r Awdurdod Cynllunio Lleol, i'w gymeradwyo'n ysgrifenedig ganddo, gynllun ar gyfer cael gwared ar Didemnum vexillum (Chwistrell Fôr) a bydd raid ei gyflawni yn unol â'r manylion a ddarparwyd.

Rheswm: Er budd diogelu pysgodfeydd a bywyd gwyllt lleol.

(47) Cyn cychwyn 'Gwaith Galluogi, Mynediad ac Isadeiledd Cychwynnol' bydd raid cyflwyno i'r Awdurdod Cynllunio Lleol i'w gymeradwyo'n ysgrifenedig ganddo, Gynllun Rheoli Cynefinoedd a Bywyd Gwyllt a bydd raid gweithredu'r cynllun hwnnw yn unol â'r manylion a ddarparwyd.

Rheswm: Er budd diogelu bywyd gwyllt.

(48) Cyn cychwyn ar y Prif Ddatblygiad neu unrhyw ran ohono, bydd raid cyflwyno i'r Awdurdod Cynllunio Lleol i'w gymeradwyo'n ysgrifenedig ganddo, Strategaeth ar gyfer Plannu a Thirlunio a bydd raid gweithredu'r strategaeth honno yn unol â'r manylion a ddarparwyd.

Rheswm: Er budd mwynderau gweledol.

Reason: In order to avoid amenity impacts and pollution of the aquatic environment.

(43) Prior to the bringing into use of the Marina an Environmental Code of Practice dealing with boat cleaning by all boat users shall be submitted to and agreed in writing with the Local Planning Authority.

Reason: In order to avoid pollution of the marine environment.

(44) Details of the external artificial lighting proposed on the site during the operational phase of the Main Development or any part thereof shall be agreed in writing with the Local Planning Authority prior to its installation.

Reason: In the interests of amenity.

(45) No development shall take place until the applicant, or their agents or successors in title, has submitted and secured a programme of archaeological assessment and evaluation as approved in writing by the Local Planning Authority. The agreed programme shall be implemented in all respects as approved by this condition unless firstly otherwise agreed in writing with the Local Planning Authority.

Reason: To protect historic environment interests whilst enabling development.

(46) Prior to the commencement of 'Preliminary Enabling, Access and Infrastructure Works' an eradication plan for Didemnum vexillum (Sea Squirt) shall be submitted to and approved in writing by the local planning authority and shall be carried out in accordance with the details provided.

Reason: In the interest of safeguarding local fisheries and wildlife.

(47) Prior to the commencement of 'Preliminary Enabling, Access and Infrastructure Works' a Wildlife and Habitat Management Plan shall be submitted to and approved in writing by the Local Planning Authority and shall be carried out in accordance with the details provided.

Reason: In the interest of safeguarding wildlife.

(48) Prior to the commencement of the Main Development or any part thereof a Planting and Landscaping Strategy for the development shall be submitted to and approved in writing by the Local Planning Authority and shall be carried out in accordance with the details provided.

Reason: In the interests of visual amenity.

(49) Cyn cychwyn 'Gwaith Galluogi, Mynediad ac Isadeiledd Cychwynnol' bydd rhaid cyflwyno i'r Awdurdod Cynllunio Lleol datganiad dull ar gyfer rheoli a chael gwared ar Canclwm Siapan bydd raid gweithredu'r cynllun hono yn unol a'r manylion a ddarparwyd.

Rheswm: Er budd diogelu planhigion ac anifeiliaid brodorol.

(50) Cyn cychwyn ar y Prif Ddatblygiad neu unrhyw ran ohono, bydd raid cyflwyno i'r Awdurdod Cynllunio Lleol i'w gymeradwyo'n ysgrifenedig ganddo, strategaeth tir cyhoeddus ar gyfer pob cam o'r datblygiad gan gynnwys y deunyddiau, triniaethau, tirlunio caled a meddal, cynigion ar gyfer celf gyhoeddus, dodrefn stryd, mynediad cyhoeddus a dehongliad a gwybodaeth, a bydd raid gweithredu'r strategaeth honno yn unol â'r manylion a ddarparwyd.

Rheswm: Er budd mwynderau cyhoeddus ac i sicrhau cynllun datblygu boddhaol.

(51) Bydd raid i bob adeilad newydd nad yw'n annedd breswyl ac a gymeradwyir yma fod wedi ei adeiladu i gwrdd â graddfa 'Da lawn' y cynllun BREEAM neu gynllun sicrhau ansawdd cyfatebol a chwrdd â'r credydau mandadol ar gyfer graddfa Ardderchog dan gategori Ene 1- Gostwng Allyriadau CO2 yn unol â gofynion BREEAM 2011 ac eithrio lle cymeradwywyd yn wahanol yn ysgrifenedig gan yr Awdurdod Cynllunio Lleol. Bydd raid gweithredu'r datblygiad yn unol â'r asesiad a'r ardystiad a gymeradwywyd.

Rheswm: Sicrhau bod y datblygiad yn cwrdd â safonau cynaliadwyedd a gydnabyddir yn genedlaethol.

(52) Ni chaniateir codi unrhyw adeilad a gymeradwyir yma hyd nes y bydd Tystysgrif Dros Dro wedi ei chyflwyno i'r Awdurdod Cynllunio Lleol, yn ardystio bod graddfa 'Da lawn' dan y cynllun BREEAM wedi ei chyflawni gyda'r credydau mandadol ar gyfer graddfa Ardderchog dan gategori Ene1 - Gostwng Allyriadau CO2 yn unol â gofynion BREEAM 2011 ac eithrio lle cymeradwywyd yn wahanol yn ysgrifenedig gan yr Awdurdod Cynllunio Lleol.

Rheswm: Sicrhau bod y datblygiad yn cwrdd â safonau cynaliadwyedd a gydnabyddir yn genedlaethol.

(53) Cyn y gellir defnyddio'r adeiladau unigol a

(49) Prior to the commencement of 'Preliminary Enabling, Access and Infrastructure Works' a method statement for the control and eradication of Japanese Knotweed shall be submitted to and approved in writing by the Local Planning Authority and shall be carried out in accordance with the details provided.

Reason: In the interests of safeguarding native plants and animals.

(50) Prior to the commencement of the Main Development or any part thereof a public realm strategy for each phase of the development detailing the materials, treatments, hard and soft landscaping, proposals for public art, street furniture, public access and interpretation and information provision shall be submitted to and approved in writing with the Local Planning Authority and shall be carried out in accordance with the details provided.

Reason: In the interests of public amenity and to ensure that a satisfactory scheme of development is delivered.

(51) Each new non-residential building hereby permitted shall be constructed to achieve a minimum overall (Building Research Establishment Method (BREEAM)) (or subsequent equivalent quality assured scheme) rating of Very Good and achieve the mandatory credits for an Excellent rating under category Ene 1- Reduction of CO2 Emissions in accordance with the requirements of (BREEAM)(2011) unless otherwise approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved assessment and certification.

Reason: To ensure that the development meets nationally recognised sustainability credentials.

(52) Construction of any building hereby permitted shall not begin until an 'Interim Certificate' has been submitted to the local planning authority, certifying that a minimum overall (BREEAM) rating of Very Good has been achieved with the mandatory credits for an Excellent rating under category Ene1 - Reduction of CO2 Emissions in accordance with the requirements of (BREEAM)(2011) unless otherwise approved in writing by the Local Planning Authority.

Reason: To ensure that the development meets nationally recognised sustainability credentials.

(53) Prior to the occupation of the individual

ganiateir yma neu unrhyw ddyddiad arall a gymeradwyir yn ysgrifenedig gan yr Awdurdod Cynllunio Lleol, bydd raid cyflwyno Tystysgrif Derfynol i'r Awdurdod Cynllunio Lleol yn ardystio bod graddfa Da lawn y cynllun BREEAM wedi ei chyflawni gyda'r credydau mandadol ar gyfer graddfa Ardderchog dan Ene1 - Gostwng Allyriadau CO2 yn unol â gofynion BREEAM 2011 ac eithrio lle cymeradwywyd yn wahanol yn ysgrifenedig gan yr Awdurdod Cynllunio Lleol.

Rheswm: Sicrhau bod y datblygiad yn cwrdd â safonau cynaliadwyedd a gydnabyddir yn genedlaethol.

(54) Ni chaniateir cychwyn adeiladu'r anheddau a gymeradwyir yma hyd nes y bydd Tystysgrif Dros Dro wedi ei chyflwyno i'r Awdurdod Cynllunio Lleol a'i chymeradwyo'n ysgrifenedig ganddo, yn ardystio bod Lefel 3 Côt ar gyfer Cartrefi Cynaliadwy ac o leiaf 1 credyd dan Ene 1 - Cyfradd Allyriadau Anheddau wedi eu cyflawni ar gyfer yr annedd yn unol â gofynion y Côt ar gyfer Cartrefi Cynaliadwy: Canllawiau Technegol 11 Tachwedd 2010 (Fersiwn 3) (neu unrhyw ofynion/safonau cyfatebol a all fod mewn grym ar adeg y cofrestriad).

Rheswm: Lliniaru achosion newid hinsawdd a sicrhau y gallu i wrthsefyll y newid a ragwelir yn yr hinsawdd.

(55) Cyn y gall neb symud i fyw i'r anneddau a gymeradwyir yma, bydd raid cyflwyno i'r Awdurdod Cynllunio Lleol i'w chymeradwyo'n ysgrifenedig ganddo, Dystysgrif Derfynol dan y Côt ar gyfer Cartrefi Cynaliadwy yn ardystio bod Lefel 3 Côt Cartrefi Cynaliadwy ac o leiaf 1 credyd dan Ene 1 - Cyfradd Allyriadau Anheddau wedi eu cyflawni ar gyfer yr annedd yn unol â gofynion y Côt ar gyfer Cartrefi Cynaliadwy: Canllawiau Technegol 11 Tachwedd 2013 (Fersiwn 3), (neu unrhyw ofynion/safonau cyfatebol a all fod mewn grym ar adeg y cofrestriad).

Rheswm: Lliniaru achosion newid hinsawdd a sicrhau'r gallu i wrthsefyll y newid a ragwelir yn yr hinsawdd.

(56) Bydd yr elfen defnydd masnachol a hamdden o'r datblygiad a gymeradwyir yma yn cynnwys 8 uned na fydd eu cyfanswm arwynebedd llawr yn fwy na 4040 o fetrau sgwâr a bydd raid eu cyfyngu i'r dosbarthiadau defnydd isod: A1, A2, A3 a B1. Bydd raid cyflwyno manylion am osodiad ac arwynebedd llawr gros pob uned unigol i'r Awdurdod Cynllunio Lleol i'w cymeradwyo'n ysgrifenedig ganddo cyn y gwneir defnydd ohonynt. Wedi hynny ni chaniateir newid yr un uned ac eithrio lle cytunwyd fel arall yn ysgrifenedig gyda'r Awdurdod Cynllunio Lleol.

buildings hereby permitted or any other date as may be approved in writing by the Local Planning Authority, a 'Final Certificate' shall be submitted to the Local Planning Authority certifying that a minimum overall (BREEAM) rating of Very Good has been achieved with the mandatory credits for an Excellent rating under Ene1 - Reduction of CO2 Emissions in accordance with the requirements of (BREEAM)(2011) unless otherwise approved in writing by the Local Planning Authority.

Reason: To ensure that the development meets nationally recognised sustainability credentials.

(54) Construction of the dwellings hereby permitted shall not begin until an 'Interim Certificate' has been submitted to and approved in writing by the Local Planning Authority, certifying that a minimum Code for Sustainable Homes Level 3 and a minimum of 1 credits under 'Ene 1 - Dwelling Emission Rate', has been achieved for the dwelling in accordance with the requirements of the Code for Sustainable Homes: Technical Guide 11th November 2010 (Version 3). (or any subsequent equivalent and/or standard as may be in force at the time of registration).

Reason: To mitigate the causes of climate change and ensure resilience against the predicted future climate changes.

(55) Prior to the occupation of the dwellings hereby permitted, a Code for Sustainable Homes 'Final Certificate' shall be submitted to and approved in writing by the Local Planning Authority certifying that a minimum Code for Sustainable Homes Level 3 and a minimum of 1 credits under 'Ene 1 - Dwelling Emission Rate', has been achieved for the dwelling in accordance with requirements of the Code for Sustainable Homes: Technical Guide 11th November 2010 (Version 3), (or any subsequent equivalent and/or standard as may be in force at the time of registration).

Reason: To mitigate the causes of climate change and ensure resilience against the predicted future climate changes.

(56) The commercial and leisure use element of the development hereby permitted shall comprise of 8 units with a combined total of no more than 4040 square meters of floor area and shall be limited to the following use classes : A1,A2,A3 and B1. The disposition and gross floor area of each individual unit shall be submitted to and approved in writing by the Local Planning Authority prior to their occupation or beneficial use. Thereafter each unit shall remain as approved unless otherwise agreed in writing by the Local Planning

Rheswm: Diogelu hyfywedd a bwrlwm canol tref Caergybi.

(57) Bydd gwerthu a darparu nwyddau a gwasanaethau o'r elfen fasnachol/hamdden a gymeradwyir yma yn cael ei gyfyngu i nwyddau a gwasanaethau sy'n gysylltiedig â'r môr ac eitemau a gwasanaethau perthynol.

Rheswm: Diogelu hyfywedd a bwrlwm canol tref Caergybi.

(58) Bydd raid i osodiad y defnyddiau o fewn safle'r cais (yn gyson gyda lefelau gofod llawr, maint ac uchder yr adeiladau a gymeradwyir yma) gydymffurfio gyda'r Cynllun Is-Ardal Ddatblygu (Cynllun Rhif 34405-PL03 Diwydiad P5 Ionawr 2012) a gyflwynwyd i gefnogi'r cais amlinellol hwn neu unrhyw Gynllun Ardal dilynol ac Atodlen Llety y cytunwyd arnynt yn ysgrifenedig gyda'r Awdurdod Cynllunio Lleol.

Rheswm: Yn unol â'r asesiad o'r effaith ar yr amgylchedd a'r broses cynllun meistr ac i ddarparu dyluniad trefol boddhaol o fewn y datblygiad.

(59) Bydd raid cyflwyno i'r Awdurdod Cynllunio Lleol, i'w cymeradwyo yn ysgrifenedig ganddo fel rhan o'r ceisiadau materion a gadwyd yn ôl ar gyfer y rhan benodol honno o'r prif ddatblygiad, fanylion am osodiad a maint ardaloedd masnachol a hamdden y cynllun a gymeradwyir yma, ynghyd â'r ystod o nwyddau a werthir yno. Bydd raid glynu wrth y defnydd a gymeradwywyd ac eithrio lle mae'r Awdurdod Cynllunio Lleol wedi cytuno fel arall yn ysgrifenedig.

Rheswm: Diogelu hyfywedd a bwrlwm canol tref Caergybi.

(60) Ni fydd adeiladau ar gyfer Defnyddiau Dosbarth A1 ac A3 a gymeradwyir yma ar agor nac yn cael eu defnyddio ac eithrio rhwng 07:00 a 23:30 o ddydd Llun i ddydd Gwener, a rhwng 07:30-23:30 ar ddydd Sadwrn a rhwng 08:00 a 23:00 ddydd Sul a Gwyliau Banc.

Rheswm: Diogelu mwynderau'r ardal a mwynderau deiliaid eiddo preswyl cyfagos.

(61) Ni chaniateir gwneud defnydd cyntaf o'r adeiladau a gymeradwyir yma hyd nes bydd manylion am y Strategaeth Storio a Chasglu Gwastraff ar gyfer unedau preswyl ac adwerthu/masnachol wedi eu cyflwyno i'r Awdurdod Cynllunio Lleol a'u

Authority.

Reason: To safeguard the vitality and viability of Holyhead town centre.

(57) The sale and provision of goods and services from the commercial/leisure element hereby permitted shall be restricted to marine related goods and services and associated items and services.

Reason: To safeguard the vitality and viability of Holyhead town centre.

(58) The disposition of uses within the application site (consistent with the floor space levels, scale and height of buildings hereby approved) shall accord with the submitted Development Sub-Zoning Plan (Drawing No. 34405-PL03 Rev P5 January 2012) submitted to support this outline application, or such subsequent Zoning Plan and Accommodation Schedule as may be agreed in writing with the Local Planning Authority.

Reason: In accordance with the environmental impact assessment and master planning process and to provide a satisfactory urban design within the development.

(59) Details of the layout and extent of the commercial and leisure areas of the hereby permitted scheme, plus the range of goods to be sold therein, shall be submitted to and approved in writing by the Local Planning Authority as part of the reserved matters application(s) for that particular phase of the Main Development. The occupation and uses initially approved shall remain in accordance with these approved details, unless otherwise approved in writing by the Local Planning Authority.

Reason: To safeguard the vitality and viability of Holyhead town centre.

(60) The premises for Use Class A1 and A3 hereby permitted shall not be open or in use except between the hours of 07:00 and 23:30 hours Mondays to Fridays, and between 07:30 and 23:30 hours on Saturdays and between 08:00 hours and 23:00 hours on Sundays or Bank Holidays.

Reason: To safeguard the amenities of the locality and the amenities of occupiers of nearby residential properties.

(61) No buildings hereby approved shall be first occupied until details of a Waste Storage and Collection Strategy for the residential and retail/commercial units have been submitted to and approved in writing by the Local Planning

cymeradwyo yn ysgrifenedig ganddo.

Rheswm: Sicrhau bod mesurau digonol ar gyfer storio a chadw gwastraff a deunydd ailgylchu wedi eu sefydlu a'u bod yn gyson gyda gwasanaeth casglu gwastraff y Cyngor.

(62) Bydd raid i'r holl ardaloedd gwastraff cymunedol sy'n gwasanaethu'r trigolion ddarparu darpariaethau ailgylchu a storio yn unol â manylion a gyflwynir i'r Awdurdod Cynllunio Lleol ac a gymeradwyir ganddo.

Rheswm: Sicrhau darparu cyfleusterau boddhaol ar gyfer storio gwastraff a deunydd ailgylchu.

NODIADAU I'R YMGEISYDD:

Dan ddarpariaethau Deddf Adnoddau Dŵr 1991 a'r Is-ddeddfau Draenio Tir, mae angen caniatâd ysgrifenedig ar gyfer gwaith neu strwythurau arfaethedig yn, o dan neu dros y brif afon (Afon Llaingoch) neu o fewn 7 metr iddi.

Bydd angen trwydded benodol ar gyfer mewnlenni unrhyw ddeunyddiau gwastraff o fewn 500 metr i safle Ewropeaidd, safle RAMSAR neu Safle o Ddiddordeb Gwyddonol Arbennig.

Bydd raid i gludwr gwastraff cofrestredig fynd ag unrhyw bridd neu ddeunydd llygredig oddi ar y safle i safle trwyddedig addas.

Mae prif beipen ddŵr / peipen ddosbarthu'n croesi'r safle datblygu. Fel bod modd iddynt gyflawni eu dyletswydd statudol, mae gan Dwr Cymru/Welsh Water hawl i gael mynediad i'w gyfarpar bob amser. Efallai y bydd modd gwyro'r beipen ddŵr hon dan Adran 185 Deddf Diwydiant Dŵr 1991.

Mae system garthffosiaeth gyhoeddus yn croesi'r safle datblygu. Yn unol â Deddf Diwydiant Dŵr 1991 mae gan Dwr Cymru/Welsh Water hawl i gael mynediad at ei gyfarpar bob amser.

Os bydd angen cysylltu i'r system garthffos gyhoeddus cynghorir y datblygwr i gysylltu ag Ymgynghorwyr Datblygu Rhwydwaith / Dŵr Cymru/Welsh water.

Ni ddylid codi unrhyw annedd y mae modd byw ynddi o fewn 15 metr i unrhyw orsaf bwmpio gyhoeddus ar gyfer carthion.

Rhaid i unrhyw adeilad bwyd gydymffurfio â gofynion Rheoliadau Hylendid Bwyd (Cymru) 2006 a Rheoliad (EC) 852/2004.

Rhaid cofrestru unrhyw adeilad bwyd gyda'r Adran Iechyd yr Amgylchedd (Adain Diogelwch Bwyd) o leiaf 28 diwrnod cyn ei agor yn unol â Rheoliad (EC) 852/2004.

Authority.

Reason: To ensure that satisfactory measures for refuse and recycling storage and collection are in place and are compatible with the Council's waste service.

(62) All the communal refuse areas serving residents shall provide recycling provisions and separated storage in accordance with details to be submitted to and approved by the Local Planning Authority with the County Council's requirements.

Reason: To ensure provision of satisfactory facilities for the storage of refuse and recycling.

NOTES TO APPLICANT:

Under the provisions of the Water Resources Act 1991 and the Land Drainage Byelaws written consent is required for proposed works or structures in, under, over or within 7 meters of the main river (Afon Llaingoch).

A bespoke permit will be required for any infilling of waste materials within 500 meters of a European site, RAMSAR site or Site of Scientific Interest.

Any contaminated soil or material removed off site must be taken by a registered waste carrier to a suitably licenced site.

The development site is crossed by a trunk/distribution watermain. In order to perform their statutory duty Dwr Cymru/Welsh Water has a right of access to their apparatus at all times. It may be possible for these watermain to be diverted under Section 185 of the Water Industry Act 1991.

The development site is crossed by a public sewerage system. Under the Water Industry Act 1991 Dwr Cymru/Welsh Water has a right of access to its apparatus at all times.

If connection is required to the public sewerage system the developer is advised to contact Dwr Cymru/Welsh Water Network Development Consultants.

No habitable building should be constructed within a 15 meter vicinity to any public foul sewerage pumping station.

Any food premises must comply with the requirements of the Food Hygiene (Wales) Regulations 2006 and Regulation (EC) 852/2004.

Any food premises must be registered with the Environmental Health Department (Food Safety Section) at least 28 days prior to opening under

Cynghorir y datblygwr i gysylltu â'r Adran Iechyd yr Amgylchedd mewn perthynas â chynlluniau ar gyfer dyluniad/gosodiad ceginau ac ar gyfer unrhyw adeilad adwerthu lle bwriedir gwerthu bwyd.

Rhaid i'r datblygiad gydymffurfio â gofynion Deddf Iechyd a Diogelwch yn y Lle Gwaith 1974 a'r holl reoliadau a wneir dan y Ddeddf honno.

Mae'r cynllun datblygu ar gyfer Ynys Môn yn cynnwys Cynllun Fframwaith Gwynedd (1993), Cynllun Lleol Ynys Môn (1996) a'r Cynllun Datblygu Unedol a ddaeth i ben. 'Roedd y polisiâu canlynol yn berthnasol i'r sylw a roddwyd i'r cais hwn: A1, A3, A7, A9, B1, B12, C8, CH1, CH10, CH13, D1, D4, D15, D16, D17, D19, D20, D21, D22, D24, D25, D26, D28, D29, D32, , FF10, FF11, FF12, FF15, FF16, FF17 a FF20 Cynllun Fframwaith, 1, 2, 5, 19, 23, 26, 28, 31, 33, 36, 37, 38, 39, 40, 41, 42, 48, 49, 51 a 53 Cynllun Lleol PO1, PO2, PO3, PO4, PO6, PO7, PO8, PO8a, GP1, GP2, EP9, TR3, TR10, TR10a, TO1, TO8, TO9, TO10, TO14, EN1, EN4, EN5, EN6, EN9, EN10, EN12, EN13, EN15, EN16, HP1, HP2, HP3, HP6, HP7, SG2, SG4, SG6, SG7 a SG8 Cynllun Datblygu Unedol a stopiwyd.

Ystyriwyd y gwybodaeth o fewn y Datganiad Amgylcheddol dyddiedig Rhagfyr 2010 (fel y'i diwygiwyd) wrth benderfyni'r cais yma.

Regulation (EC) 852/2004.

The developer is advised to contact the Environmental Health Department regarding plans for kitchen layout/design any for any retail premises where food is to be sold.

Development must comply with the requirements of the Health & Safety at Work etc Act 1974 and all regulations made under that Act.

The development plan covering Anglesey consists of the Gwynedd Structure Plan (1993), the Ynys Môn Local Plan (1996) and the stopped Ynys Môn Unitary Development Plan. The following policies were relevant to the consideration of this application: A1, A3, A7, A9, B1, B12, C8, CH1, CH10, CH13, D1, D4, D15, D16, D17, D19, D20, D21, D22, D24, D25, D26, D28, D29, D32, , FF10, FF11, FF12, FF15, FF16, FF17 and FF20 Structure Plan, 1, 2, 5, 19, 23, 26, 28, 31, 33, 36, 37, 38, 39, 40, 41, 42, 48, 49, 51 and 53 Local Plan and PO1, PO2, PO3, PO4, PO6, PO7, PO8, PO8a, GP1, GP2, EP9, TR3, TR10, TR10a, TO1, TO8, TO9, TO10, TO14, EN1, EN4, EN5, EN6, EN9, EN10, EN12, EN13, EN15, EN16, HP1, HP2, HP3, HP6, HP7, SG2, SG4, SG6, SG7 and SG8 stopped Unitary Development Plan.

The contents of the environmental information contained within the Environment Statement dated December 2010 (as amended) were taken into account in the determination of this application.

DYDDIAD Y PENDERFYNIAD **14/02/2014** DATE OF DECISION

Yr eiddoch yn gywir / Yours faithfully



JIM WOODCOCK
PENNAETH GWASANAETH CYNLLUNIO / HEAD OF PLANNING SERVICE

Appendix B1

The Illustrative Masterplan for the Proposed Development for which Outline Planning Permission (with All Matters Reserved) was granted in 2014



- Apartments
- 2 Bedroom Townhouses
- 3/4 Bedroom Townhouses
- 4/5 Bedroom Townhouses
- Hotel
- Retail
- Maritime Museum & Visitor Centre
- Marine Workshop
- New Youth Club House



HOLYHEAD WATERFRONT

Figure 4.1

Proposed Masterplan

Not To Scale	Date December 2010
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Appendix B2

Development Zoning of the 2014 Masterplan



-  Marina and Promenade
-  Porth Y Felin
-  Soldiers Point and the Great Breakwater

axis

HOLYHEAD WATERFRONT

Figure 4.2

Development Zoning

Not To Scale

Date
December 2010

Appendix C

Isle of Anglesey County Council's Decision on the Section 73 Application



Mr. Freddie Jones
Property Director
Conygar Investment Company PLC

Sent by email:
freddiejones@conygar.com

DEWI FRANCIS JONES MSc, M.R.T.P.I
Prif Swyddog Cynllunio – Rheoleiddio a Datblygu
Economaidd
Chief Planning Officer – Regulation and Economic
Development

CYNGOR SIR YNYS MÔN
ISLE OF ANGLESEY COUNTY COUNCIL
Swyddfeydd y Cyngor • Council Offices
LLANGEFNI
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LL77 7TW

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Gofynnwch am/Ask for: **Rhys LI Jones**
☎ (01248) 752468
e-mail: RhysLIJones@anglesey.gov.uk

Ein Cyf / Our Ref: VAR/2020/20/EIA
Eich Cyf / Your Ref:

Dyddiad / Date 29 May 2020

OFFICIAL SENSITIVE

Dear Freddie,

Holyhead Waterfront Section 73 Application and Reserved Matters

On the 4th March 2020, Conygar Ltd. (“the applicant”) made an application under Section 73 of the Town and Country Planning Act 1990 (as amended) to amend outline consent 19C1046A/EIA/ECON granted on the 14th February 2014 (“the Planning Permission”). The Planning Permission will expire on the 13th February 2021 unless valid Reserved Matters application(s) are made before this date.

The Section 73 application primarily related to Condition 3 (submission of reserved matters) and Condition 4 (implementation of consent) of the application. Condition 3 stated that application for approval of the reserved matters shall be made to the Local Planning Authority before the expiration of 5 years from the date of the permission (i.e. 13th February 2019). As the applicant has not submitted applications for reserved matters before this expiry date in accordance with Condition 3, they are seeking to vary this condition to allow a further 3 years to submit reserved matters and a further 5 years to implement the consent (Condition 4).

The applicant sought legal advice and this advice confirmed that a Section.73 application can be made to extend the time limit of an existing permission in Wales. The IACC sought its own independent legal advice and this advice is consistent with the applicant’s legal advice.

At the same time as making the Section 73 application, Conygar Ltd and their consultants has requested and attended reserved matters discussions with County Council Officers. Some of the draft proposals tabled in discussions would indicate that the proposed reserved matters applications developed so far omit elements such as the hotel and museum from the matters

for which detailed approval is sought. The IACC have sought legal advice on this matter and this letter has been written having received such advice.

The purpose of this letter is to express the IACC's concern relating to the apparent difference between the extant consent for which s.73 is sought, and the emerging detail in the Reserved Matters discussions. The IACC also take this opportunity to explain to the applicant the IACC's role and duty in pre-application discussions.

Scope of Section 73 Applications

The Development Management Manual for Wales summarises the three broad types of s73 applications. These are applications to:

- a) extend the time limit of an existing permission (commonly referred to as a 'renewal' application);
- b) allow 'minor material amendments' to planning permissions; and
- c) allow the variation or removal of any other condition attached to a planning permission.¹

The decision-maker can only consider the question of what conditions the s73 permission can be subject to.

In determining whether a variation to a condition is a minor material amendment to the permission, the test is whether an amendment the scale and nature of which results in a development which is not substantially different from that which has been approved.² The test that has evolved in the Courts is whether a new condition attached to a s73 permission would fundamentally alter the existing permission.³ If it would, then a new application is required.

The applicant has confirmed that the s.73 application is the same proposal as the approved permission. For the purposes of the above tests, the IACC is satisfied that the s.73 variation will not substantially alter the proposal from that which has been approved. However, from initial discussions on the Reserved Matters, the IACC is concerned that the emerging Reserved Matters applications do not align with the planning permission which has been granted. Where Reserved Matters applications are made which would act to fundamentally alter the nature of the development, that effect is a valid ground for refusal.

Many of the elements for which planning permission was granted (e.g. the hotel, museum and up to 50% affordable housing) were material socio-economic considerations which were given weight in the original decision making process. Eliminating these elements from the reserved matters fundamentally changes the nature of the development.

Changing the Description of Development

IACC have sought legal advice as to whether the description of development should be changed given that Conygar have raised the possibility of not delivering all of the consented

¹ Para 13.3.2

² Ibid., para 13.3.4

³ *R v Coventry City Council ex p Arrowcraft Group plc* [2001] PLCR 7

elements. The Court of Appeal confirmed last year in *Finney v Welsh Ministers*⁴ that s.73 cannot be used to change the description of development, that is outside the scope of a minor material amendment.

In *Finney*, the description of development referred to wind turbines with a tip height of up to 100m. An application was made to amend the condition of the original consent which required the development to be carried out in accordance with an approved plan that showed the tip height as 100m. The description of development and the plan would need to have been changed. The Court found that s.73 could not be used.

It would therefore not be lawful for IACC to amend the description of development to exclude any material part of the Development. A fresh application would be required.

Reserved Matters Application Not Reflecting Whole Consent

A local planning authority cannot refuse a Reserved Matters application because it no longer considers a development to be desirable. However, a Reserved Matters application can be refused if the matters set out in the application would alter the nature of a development for which outline permission has been granted.

In this case, IACC is concerned that the Reserved Matters approvals will not reflect the outline consent and that Conygar will seek to exclude, in particular, the museum, hotel and change the affordable housing percentage.

The hotel is part of the description of development. A change made to exclude the hotel would be an alteration to the nature of the development.

By way of example, in *R (Morland) v West Wiltshire District Council*⁵ an Reserved Matters application was submitted which included 71 dwellings on an area of a site which had been set aside for a district centre on the masterplan attached to the original outline planning permission. There was a condition that allowed for the district centre to include an element of ancillary residential development. The authority's decision to allow the Reserved Matters approval was quashed by the Court. The Judge found that, although the masterplan was illustrative, it was intended to indicate something. A minor boundary revision to realign the highway layout would be allowed, but a significant amount of non-ancillary residential development within the area set aside for a district centre was not. A new application should have been sought. It was not the case that "*the master plan should be disregarded and treated as no more than a red line around the site*".⁶

The decision in *Morland* is directly relevant. The masterplan for the Holyhead Waterfront Development clearly shows the museum and the hotel as separate areas of development. If Conygar submit a Reserved Matters application seeking to exclude those elements, or replace them with housing, the IACC would require to be satisfied that the legal concerns over the acceptability of the change in the composition of the development as consented at outline have been fully resolved in order to be able to grant. At this time, such concerns have not been

⁴ [2019] EWCA Civ 1868

⁵ [2006] EWHC 1243 (Admin)

⁶ At para [8].

addressed and the IACC remain concerned that a decision to grant would be contrary to the established law and therefore vulnerable to successful challenge.

The IACC will not be able to approve any Reserved Matters application which is not consistent with the outline consent. If Conygar wish to pursue the Reserved Matters scheme which is not consistent with the outline consent, then a new planning application will be required.

Pre-Application Discussions for Reserved Matters

IACC has also sought legal advice on whether Officers can and should engage in pre-application discussions on Reserved Matters while the section 73 application is pending determination. The legal advice on this point is predicated on the following understanding of the facts;

- i. the section 73 application does not seek to change the substance of the Planning Permission;
- ii. no Reserved Matters applications have been made which could act to vary the Planning Permission by changing the composition of the development; and,
- iii. pre-application discussion of Reserved Matters is undertaken on a without prejudice basis by both sides; the Council will not bind itself to a view, and Conygar can amend its proposals following such discussions as it wishes, it is not bound to make application in the form discussed.

Pre-application discussion with prospective applicants is encouraged and supported by a number of planning guidance documents including Welsh Government Practice guidance⁷. The guidance notes that pre-application advice “can only be given on an informal basis”⁸.

The discussions with Conygar are designed to assist in shaping Reserved Matters applications which are to follow. Conygar have complete discretion in taking those forward to applications and it is accordingly not certain that any point of concern arising in pre-application discussion will be included in any application. The pre-application discussions are exploratory, non-binding and designed to allow discussion of approaches and proposals, and the IACC participates in them on the basis that that they cannot be taken to represent firm proposals.

The situation may change if Conygar presented information which was not exploratory and which affects the material considerations of the section 73 application. The IACC therefore note that as there is now an application before the planning authority for determination it is considered appropriate to reiterate the basis of the Council’s participation in pre-application discussions and how information is held and used by the Council. In particular, that information agreed to be ‘confidential’ relates to non-distribution or publication outside of the Council, including on the planning register. Information is held by the Council corporately and it should be assumed in planning matters that Members have access to information given to Officers.

Information provided to Officers in pre-application discussion is provided to ‘the Council’ as the LPA, not Officers, the planning team or some other sub-division of the Council. Information

⁷ Realising the potential of pre-application discussions May 2012

⁸ Ibid, paragraph 3.2

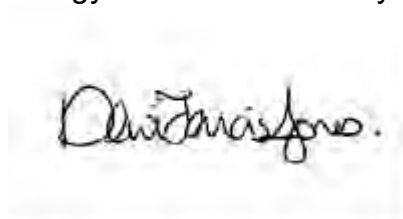
given to Officers is given to the corporate body, including Elected Members. Officers cannot withhold information from Members where doing so would act to mislead them; this could include withholding relevant information held by the Council on a material planning consideration from Members making an affected planning decision. That should be borne in mind by Conygar in deciding what information to provide to Officers during discussions.

Summary

- i. IACC can accept and determine a section 73 application to amend the time limits for submission of reserved matters and commencement of the development.
- ii. Section 73 applications cannot be used to change the fundamental nature of the development. They can make only minor material changes and cannot change the description of the development. IACC is satisfied that the s.73 application is the same development which was granted planning permission in 2014 and there have been no changes to the description or nature of the developments.
- iii. Where reserved matter applications are made which would act to fundamentally alter the nature of the Development, that effect is a valid ground for refusal. Exclusion of elements such as the hotel or museum would result in a development which does not align with the Planning Permission.
- iv. Whilst initial pre-application discussions would indicate that the proposed Reserved Matters proposal is a much improved scheme to the one approved, the IACC must determine the Reserved Matters application(s) against the Planning Permission which has been granted. Many of the socio-economic elements which were material considerations in the decision making process have now been eliminated.
- v. As some of these elements are in the development's description and are fundamentally material to the scheme, the IACC would expect them to be included in the Reserved Matters application. If these elements are to be excluded, then this fundamentally changes the nature of the development and the Reserved Matters application may be refused. If you want to proceed with the Reserved Matters application in its current form, this would require a new planning application.

I trust the IACC's position is clear on this matter, but if you wish to discuss further please do not hesitate to contact me. I look forward to receiving your response.

Yn gywir / Yours sincerely

A handwritten signature in black ink, appearing to read 'Dewi F Jones', is centered within a rectangular box.

DEWI F JONES
PRIF SWYDDOG CYNLLUNIO / CHIEF PLANNING OFFICER

Appendix D1

NRW's Response on Marine Survey Specification

From: [Griffith, Katherine](#)
To: [Sarah Marjoram](#)
Cc: [Jamie Gardiner](#); [Simon Lewis](#)
Subject: RE: Waterfront Sediment Sampling Plan
Date: 05 April 2020 20:51:41
Attachments: [image002.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.jpg](#)

Hi Sarah,

Thanks for sending on to me so quickly, it was great to chat to you.

With regard to the survey specification that you send through on the 24th of March (your reference: PB8908-RHD-ZZ-XX-FN-Z-0018) as I mentioned, due to the short timescales we are unable to use the discretionary advice service (DAS) to provide detailed advice on the specification before the dates specified (April the 13th). Given the current working situation (Covid-19) our ability to provide DAS is reduced and focus is being placed on the delivery of our statutory service. If you do wish to use the DAS then, at the moment, we can still arrange that (this may be subject to change depending on the situation), but will need to have a suitable timeframe arranged to provide you with that feedback.

As mentioned when we chatted, I have read through the specification and briefly discussed with the intertidal specialists who gave advice on your scoping note to update the ES for the recent planning application. I haven't been able to speak to the subtidal specialist and hope to do so this week.

Proposed Approach to the Marine and Coastal Ecology Surveys

Intertidal: The approach to validate the intertidal survey undertaken in 2009 is appropriate and useful for the new ES.

Subtidal: I have been unable to speak to this specialist yet, but your approach to validate the previous assessment on subtidal habitats may be needed given that the project may now involve some dredging.

D. vexillum: We agree that it would be appropriate to use the D.vex survey from 2018 for the new ES as this covers areas relevant to the development.

In the proposed approach it states *"Given the sheltered conditions inside the New Harbour and the large extent of the 2009 survey area, any increase in suspended sediment and subsequent deposition as a result of any dredging activity, should dredging be required, is not considered to have a significant effect outside of the survey area"*

As discussed there was some concern that the impacts of dredging were not going to be considered in the specification, but after my discussion with you (and the email you sent) it's clear that this is being investigated and will be addressed. It may also be useful to see some evidence to support the conclusions in the document that dredging would have no impact outside of the dredging area, so perhaps some consideration about the potential fate of suspended sediment and deposition may be needed in the ES.

Hope this helps for your meeting and let me know if you want to arrange the DAS for more formal advice.

Many thanks
Kate

Dr Kate Griffith

Uwch-ymgyngorydd Morol (Gogledd-Orllewin) / Senior Marine Advisor (North West)
Tîm Cyngor a Rheoli Ardal Morol/ Marine Area Advice and Management Team
Cyfoeth Naturiol Cymru / Natural Resources Wales

Oriau Swyddfa: Fy nyddiau gwaith arferol yw: Dydd Llun – Dydd Iau

Offie hours: My usual working days are: Monday to Thursday

Ffôn | Telephone: 0300 065 4990

E-bost | E-mail: katherine.griffith@cyfoethnaturiolcymru.gov.uk / katherine.griffith@naturalresourceswales.gov.uk

Gwefan | Website: www.cyfoethnaturiolcymru.gov.uk / www.naturalresourceswales.gov.uk

Yn falch o arwain y ffordd at ddyfodol gwell i Gymru trwy reoli'r amgylchedd ac adnoddau naturiol yn gynaliadwy.

Proud to be leading the way to a better future for Wales by managing the environment and natural resources sustainably



Siaradwr Cymraeg

Croesewir gohebiaeth yn y Gymraeg a'r Saesneg / Correspondence welcomed in both Welsh and English.

Ffoniwch ni ar **03000 65 3000** (24-awr) i roi gwybod am ddigwyddiadau amgylcheddol / Call us on **03000 65 3000** (24-hour) to report environmental incidents

From: Sarah Marjoram <Sarah.Marjoram@rhdhv.com>

Sent: 03 April 2020 13:21

To: Griffith, Katherine <Katherine.Griffith@cyfoethnaturiolcymru.gov.uk>

Cc: Jamie Gardiner <jamie.gardiner@rhdhv.com>; Simon Lewis <Simon.Lewis@rhdhv.com>

Subject: Waterfront Sediment Sampling Plan

Hi Katherine,

Thanks for the call just now.

I have attached our sample plan application form, and Cefas's response to confirm that we are carrying out sediment sampling for dredging.

If you have any further questions please let me know.

Many thanks,

Sarah

Sarah Marjoram BSc (Hons), MRes
Environmental Consultant - Marine

T +44 151 243 9272 | **E** sarah.marjoram@rhdhv.com | **W** www.royalhaskoningdhv.com

HaskoningDHV UK Ltd., a company of Royal HaskoningDHV | HoneyComb, Edmund Street, Liverpool, L3 9NG, United Kingdom

Registered Office: Rightwell House, Bretton, Peterborough PE3 8DW | Registered in England 1336844

Appendix D2

Cefas' Sediment Sampling Plan



MARINE AND COASTAL ACCESS ACT (2009) PART 4

**FORMAL REQUEST FOR PRE-APPLICATION SAMPLING ADVICE FOR CAPITAL DREDGE OF
HOLYHEAD WATERFRONT, NEWRY BEACH, HOLYHEAD BY ROYAL HASKONINGDHV
REF: SP2003**

From: Jemma Anne Lonsdale
Cefas, Lowestoft Laboratory
Date: 19th March 2020
Tel: 01502 524491
Email:
Regulatory_Assessment@cefas.co.uk

To: Jessica Ware - NRW (by e-mail)

1. With reference to your request for advice regarding pre-application sampling and analysis for the capital dredge of Holyhead Waterfront, Newry Beach Area by Royal HaskoningDHV (on behalf of Conygar Holyhead Limited), please find my advice below and a sample plan form attached.
2. Cefas provide advice to NRW on sampling plans for marine licence applications to ensure that there is sufficient evidence on sediment quality to undertake an assessment of potential impacts on the marine environment prior to issuing a Marine Licence. This may include characterisation of dredge areas or of areas where other activities are likely to lead to the mobilisation of sediments. To enable us to provide that advice, and to fulfil the UK's obligations under International Conventions in respect of disposal at sea, and the requirements of the Marine and Coastal Access Act where applicable, we require sediment samples to be provided for analysis.

Description of the project

3. This is an application to capital dredge up to 100,000m³ of material, down to 2.5m depth, from Holyhead Waterfront (Newry Beach Area). The material is to be disposed of at Holyhead North (IS043). The material is likely a composition of silt and clay.

Sampling required

4. In accordance with the recommendations of the OSPAR Guidelines for the Management of Dredged Material¹, samples should be taken to provide a good representation of the volume of material to be dredged. The distribution and depth of sampling should reflect the size and depth of the area to be dredged, the amount to be dredged and the expected variability in the horizontal and vertical distribution of contaminants. We also use the OSPAR guidelines to inform our advice on sampling requirements for other activities which are likely to lead to the mobilisation of sediments. Based on the information submitted (as described above), I am of the opinion that the following sampling and analysis is required.
5. The applicant has proposed four sample sites across the dredge area (VB-01; VB-03; VB-04 and VB-06); however I also recommend VB-10 is also subsampled for chemical analysis to ensure the

¹ <https://www.ospar.org/documents?d=34060>

samples are representative of the material to be dredged (see Figure 1). This is in keeping with the guidelines set by OSPAR, which recommend between 4 to 6 stations for dredges between 25,000 to 100,000m³.

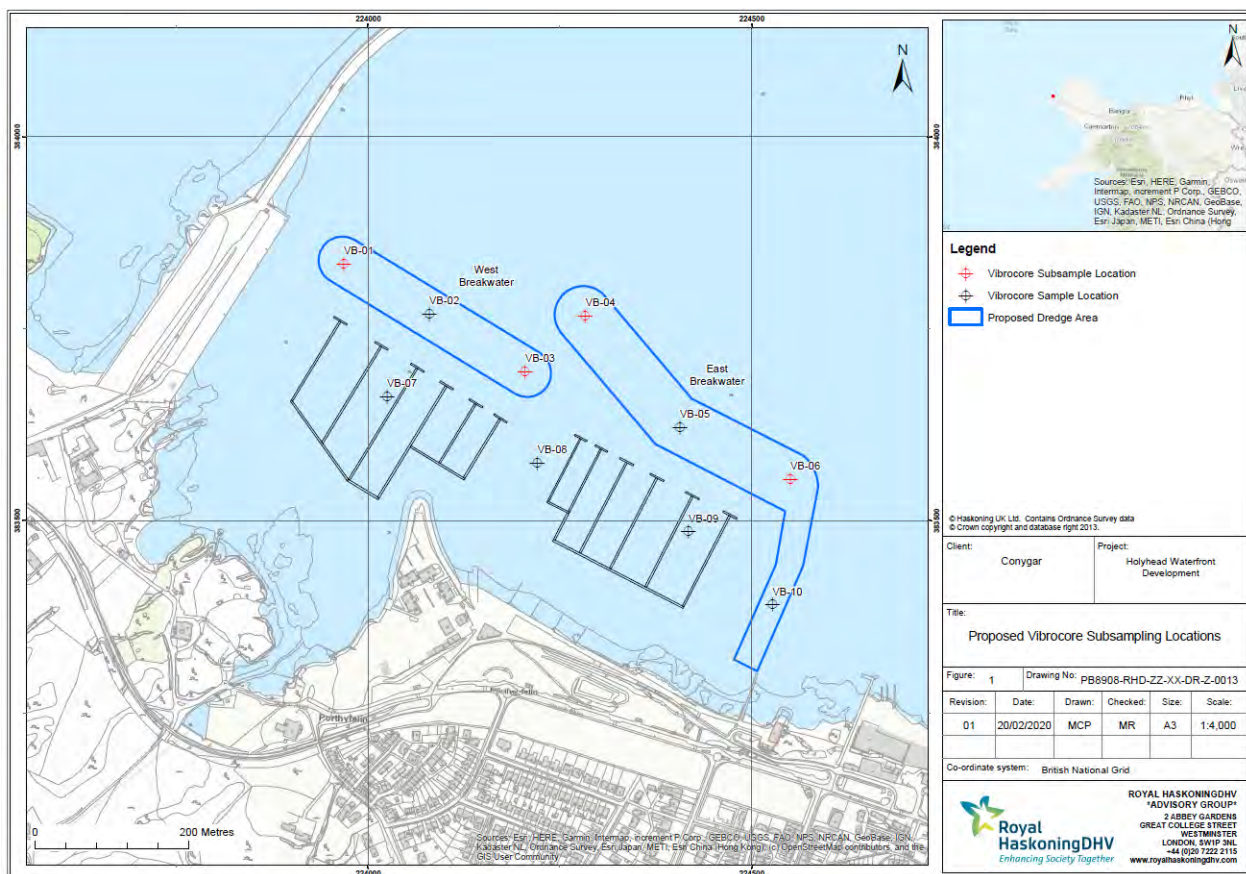


Figure 1. Map depicting proposed sample locations and dredge area

6. Samples must be taken at the surface (0 metres depth) in the locations shown on the sample map attached and at 1 metre depth intervals to a maximum dredge depth of 2.5 metres (or the maximum depth where this is below 2.5m) indicated on the sample plan form attached.
7. The following information must be included with any samples (irrespective of the laboratory to be used for analysis):
 - Clearly labelled samples;
 - Completed sample position sheet, including the latitude and longitude (decimal degrees and the projection i.e. WGS84) of each location and if core samples are required the depth at which each sample is taken;
 - Details of the method of sampling;
 - A map/chart detailing the sample locations.
8. Surface samples should be taken from the upper layer of in-situ sediment using a non-metallic / stainless steel scoop. To maintain the integrity of the samples please ensure that they are FROZEN



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and remain in the freezer until they can be dispatched. Please ensure the samples are dispatched in a cool box - the cool box should not be placed in any other packaging.

9. Samples should be kept until the licences have been issued in case any further testing is required.

Analysis Required

10. As far as I am able to determine there has been no analysis undertaken of marine sediment in the vicinity of the proposed dredge area and therefore, I would advise that the following analyses are undertaken to support any application for dredging:

- Trace metals (Cd, Cr, Cu, Hg, Ni, PB, Zn) + arsenic (As)
- Organotins
- Total Hydrocarbons (THC)
- Polycyclic Aromatic Hydrocarbons (PAHs),
- Polychlorinated Biphenyls (PCBs)
- Particle Size Analysis (PSA)

11. From a cursory view of the dredge area on Google Earth, there does not appear to be a source of Brominated flame retardants (PBDEs) or Organochlorine pesticides (OCs) therefore I have not recommended these. If, however, NRW are aware of any contamination concerns related to these chemicals or sources, please do let me know and I'll be happy to review the sample plan.

12. Further details can be found in Annex 1 (sample plan form).

13. I recommend that the analysis is carried out following established specific dredge material testing methods. A list of laboratories which are approved for the suggested determinands is available at <https://naturalresources.wales/permits-and-permissions/marine-licensing/sediment-sampling-and-analysis/?lang=en>. I consider that any results following these methods would be acceptable to support a marine licence application to NRW.

14. To ensure consistency between laboratories it is expected that all analysis required will be undertaken from the same sample container. It is the applicant's responsibility to ensure that sufficient sample is collected, in a single container, for all the analysis required. Where Cefas are analysing the samples, appropriate containers will be provided.

Conclusion

15. This advice is based solely on the information provided in the pre-application request, and the sampling and analysis described will be adequate to inform a licence application that mirrors the information in this pre-application request, providing that no further issues come to light and an application is submitted in a suitable time-frame. Cefas will take a pragmatic approach to the requirement of repeat samples in relation to projects where works have not commenced however due to the dynamic nature of the marine environment and the potential for changes in the quantity and quality of sediments, there may be a need for some sediments to be re-sampled and analysed if the project has not commenced within two years of the time of sampling.

16. Where long term licences for maintenance dredging will be applied for, additional sampling and analysis may be required throughout the duration of the proposed licence term in order to comply with the OSPAR guidelines. Required sampling will be stipulated in any granted licence.



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17. Cefas reserves the right to request further sampling/analysis should any submitted Marine Licence application differ from that information submitted in this pre-application request. Any future application must clearly state this pre-application reference number.

18. A quote for Cefas to complete the required sampling is provided below.

Jemma-Anne Lonsdale
Senior Advisor (Sustainable Marine Management)

<i>Quality Check</i>	<i>Date</i>
Charlotte Clarke	19/03/2020



Annex 1

Sample plan

Sample	Station	Metals	Organotins	THC	PAHs	PCBs	PDBEs	OCs	PSA
1	VB-01, 0m	☒	☒	☒	☒	☒	☐	☐	☒
2	VB-01, 1m	☒	☒	☒	☒	☒	☐	☐	☒
3	VB-01, 2m	☒	☒	☒	☒	☒	☐	☐	☒
4	VB-01, 2.5m	☒	☒	☒	☒	☒	☐	☐	☒
5	VB-03, 0m	☒	☒	☒	☒	☒	☐	☐	☒
6	VB-03, 1m	☒	☒	☒	☒	☒	☐	☐	☒
7	VB-03, 2m	☒	☒	☒	☒	☒	☐	☐	☒
8	VB-03, 2.5m	☒	☒	☒	☒	☒	☐	☐	☒
9	VB-05, 0m	☒	☒	☒	☒	☒	☐	☐	☒
10	VB-05, 1m	☒	☒	☒	☒	☒	☐	☐	☒
11	VB-05, 2m	☒	☒	☒	☒	☒	☐	☐	☒
12	VB-05, 2.5m	☒	☒	☒	☒	☒	☐	☐	☒
13	VB-06, 0m	☒	☒	☒	☒	☒	☐	☐	☒
14	VB-06, 1m	☒	☒	☒	☒	☒	☐	☐	☒
15	VB-06, 2m	☒	☒	☒	☒	☒	☐	☐	☒
16	VB-06, 2.5m	☒	☒	☒	☒	☒	☐	☐	☒
17	VB-10, 0m	☒	☒	☒	☒	☒	☐	☐	☒
18	VB-10, 1m	☒	☒	☒	☒	☒	☐	☐	☒
19	VB-10, 2m	☒	☒	☒	☒	☒	☐	☐	☒
20	VB-10, 2.5m	☒	☒	☒	☒	☒	☐	☐	☒

Comments:

Stations should be evenly distributed across the dredge area



Appendix D3

IoACC Response to S73 Application



Mr. David Jones,
Agent on behalf of Conygar Ltd.
Axis
Camellia House,
76 Water Lane,
Wilmslow,
Cheshire,
SK9 5BB.

CHRISTIAN BRANCH B.Sc., P.G. Dip
Pennaeth Gwasanaeth Dros Dro – Rheoleiddio a
Datblygu Economaidd
Interim Head of Service - Regulation and Economic
Development

CYNGOR SIR YNYS MÔN
ISLE OF ANGLESEY COUNTY COUNCIL
Canolfan Fusnes Môn • Anglesey Business Centre
Parc Busnes Bryn Cefni • Bryn Cefni Business Park
LLANGEFNI
Ynys Môn • Isle of Anglesey
LL77 7XA

ffôn / tel: (01248) 75 2431 / 2435

Gofynnwch am / Please ask for: Rhys Ll. Jones
E-bost / Email: RhysJones@ynysmon.gov.uk
Ein Cyf / Our Ref: VAR/2020/20/EIA
Eich Cyf / Your Ref:

Dyddiad / Date: 10 Mawrth/March 2020

Dear Mr. Jones,

Planning Application Reference VAR/2020/20/EIA

Section 73 application to vary condition 3 and condition 4 (time commencement conditions) together with the removal of conditions 51, 52, 53 (BREEAM) and 54 and 55 (Code for Sustainable Homes) of application 19C1046A/EIA/ECON (outline application for a mixed use development consisting of a new marina, residential properties, a hotel, commercial, leisure and retail uses together with associated land reclamation and service infrastructure) in order to extend the period of time within which reserved matters applications can be submitted and also extend the time period for the development being implemented at Glannau Caergybi, Caergybi / Holyhead Waterfront, Holyhead.

The above application was registered and validated on the 4th March 2020 and statutory publicity and consultations were duly issued. The IACC's Ecological Advisor responded on the 9th March 2020 raising two ecological concerns.

1. Commitment to provision of satisfactory mitigation for what at present would be a clear overall proposed loss of biodiversity, to meet requirements under the Environment Wales Act 2016 (which was not in place at the time of approval of 19C1046A/EIA/ECON). Conditions 47 and 48 could not cover this on the existing site alone; and,
2. Provision of information to enable Appropriate Assessment under the Habitats Regulations.

Item 1. above in particular requires a substantially greater commitment to ecological mitigation than was required in the original application (which was before the Environment Wales Act 2016). **An initial response on willingness to address this matter and consider ways forward is important at this stage.** Because of this, the IACC have not gone into any details relating to the recommendations etc. from the various ecological studies at this time, which are not currently geared to addressing this matter. These two matters are addressed in more detail below.

Environmental Wales Act (2016)

This section relates to the Environment Wales Act (2016) Section 6 duty and the Chief Planner's Instructions to Welsh Heads of Planning in relation to this (See attached letter dated October 2019). *(Note this duty did not exist at the time of the decision for application 19C1046A/EIA/ECON).*

The duty requires the Council to seek to maintain and enhance biodiversity, and in doing so promote the resilience of ecosystems, whilst carrying out its functions. The Chief Planner quotes PPW 10 in connection with the duty:

'Planning Policy Wales (PPW) 10 sets out that "planning authorities must seek to maintain and enhance biodiversity in the exercise of their functions. This means that development should not cause any significant loss of habitats or populations of species, locally or nationally and must provide a net benefit for biodiversity" (para 6.4.5 refers). This policy and subsequent policies in Chapter 6 of PPW 10 respond to the Section 6 Duty of the Environment (Wales) Act 2016...'

He then instructs:

'...in light of the legislation and Welsh Government policy outlined above, where biodiversity enhancement is not proposed as part of an application, significant weight will be given to its absence, and unless other significant material considerations indicate otherwise it will be necessary to refuse permission.'

...And further goes on to say:

'The attributes of ecosystem resilience (PPW para 6.4.9 refers) should be used to assess the current resilience of a site, and this must be maintained and enhanced post development. If this cannot be achieved, permission for the development should be refused.'

The proposal would affect large areas of marine and land habitats, leading to clear overall losses in biodiversity. Although there is currently, some provision for ecological mitigation in the current outline permission conditions, (particularly 47 and 48) these were not geared to the requirements of the 2016 Act, and would/ could not address the issue of overall loss, which the proposals would lead to, within the limits of the red line area. This area does not have enough mitigation potential. Serious and robust coverage of this matter would certainly be essential if the application for the proposal were being made for the first time today.

The IACC advise that in order to ensure biodiversity gains, there would need to be a detailed clear assessment of losses, with proposed mitigation action points set against these, for both onshore and marine areas affected. For onshore biodiversity, it is unclear whether overall enhancement would be feasible in the area involved. If not, ecological management of further areas of land, which have not featured within the proposals before, would be required.

Losses in marine / intertidal habitats and their associated species appear at present to be completely unmitigated. Consideration needs to be given as to how these losses can be mitigated, and this would certainly require the bringing-in of other areas to achieve this.

The Chief Planner's letter provides some guide for this kind of scenario:

'Securing a net benefit for biodiversity within the context of PPW requires a pragmatic response to the specific circumstances of the site. Working through the step wise approach (PPW para 6.4.21 refers), if biodiversity loss cannot be completely avoided (i.e. maintained), and has been minimised, it is useful to think of net benefit as a concept to both compensate for loss and look for and secure enhancement opportunities. A net benefit for biodiversity can be secured through habitat creation and/or long-term management arrangements to enhance existing habitats, to improve biodiversity and the resilience of ecosystems. Securing a net benefit for biodiversity is not necessarily onerous; through understanding local context, it is possible to identify new opportunities to enhance biodiversity.'

To conclude this point, there should be a means of ensuring that the proposal would lead to clear biodiversity net gain. If, in light of the above, this could not be achieved by means of the present conditions. The IACC is happy to discuss the addressing of this matter, but it can only be overcome by significant changes relating to the proposals, by involving new commitments to action / areas of ecological mitigation which have not featured to date.

Habitat Regulations Assessment Screening Report (Nov 2019)

The Screening concludes that likely significant effects from the proposal cannot be ruled out. There are potential operational impacts on Glannau Ynys Gybi SAC, on the designation's listed habitats from increased visitor pressure. The habitats are: i) European dry heaths, and ii) North Atlantic wet heaths.

In order for an Appropriate Assessment to be undertaken, the applicant is requested to provide information relevant to this matter, namely figures for local population increase, projected recreational visits to the SAC etc., in light of the proposal.

The IACC would request that you address the two matters raised above and would be happy to discuss further as necessary.

Yn gywir / Yours sincerely,



Christian Branch

**Pennaeth Gwasanaeth Dros Dro – Gwasanaeth Rheoleiddio a Datblygu Economaidd
Interim Head of Service - Regulation and Economic Development Service**

Appendix D4

NRW Response to S73 Application

Maes Y Ffynnon,
Penrhosgarnedd,
Bangor,
Gwynedd
LL572DW

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

ebost/email:
northplanning@cyfoethnaturiolcymru.gov.uk
Ffôn/Phone: 03000 65 5241

13/05/2020

Annwyl Syr/Madam / Dear Sir/Madam,

BWRIAD / PROPOSAL: CAIS ADRAN 73 I AMRYWIO AMOD 3 AC AMOD 4 (AMODAU CYFNOD CYCHWYN) YNGHYD Â THYNNU AMODAU 51, 52, 53 (BREEAM) A 54 A 55 (CÔD AR GYFER CARTREFI CYNALIADWY) O GAIS 19C1046A/EIA/ECON (CAIS AMLINELLLOL AR GYFER DATBLYGIAD DEFNYDD CYMYSG YN CYNNWYS MARINA NEWYDD, EIDDO PRESWYL, GWESTY, DEFNYDD MASNACHOL, HAMDDEN A DEFNYDDIAU ADWERTHU YNGHYD AG ADFERIAD TIR CYSYLLTIEDIG AC ISADEILEDD GWASANAETH) ER MWYN YMESTYN Y CYFNOD O AMSER Y GALL Y CEISIADAU MATERION A GEDWIR YN ÔL GAEL EU CYFLWYNO A HEFYD YMESTYN Y CYFNOD O AMSER AR GYFER Y DATBLYGIAD YN CAEL EI WEITHREDU.

SECTION 73 APPLICATION TO VARY CONDITION 3 AND CONDITION 4 (TIME COMMENCEMENT CONDITIONS) TOGETHER WITH THE REMOVAL OF CONDITIONS 51, 52, 53 (BREEAM) AND 54 AND 55 (CODE FOR SUSTAINABLE HOMES) OF APPLICATION 19C1046A/EIA/ECON (OUTLINE APPLICATION FOR A MIXED USE DEVELOPMENT CONSISTING OF A NEW MARINA, RESIDENTIAL PROPERTIES, A HOTEL, COMMERCIAL, LEISURE AND RETAIL USES TOGETHER WITH ASSOCIATED LAND RECLAMATION AND SERVICE INFRASTRUCTURE) IN ORDER TO EXTEND THE PERIOD OF TIME WITHIN WHICH RESERVED MATTERS APPLICATIONS CAN BE SUBMITTED AND ALSO EXTEND THE TIME PERIOD FOR THE DEVELOPMENT BEING IMPLEMENTED.

LLEOLIAD / LOCATION: GLANNAU CAERGYBI, CAERGYBI / HOLYHEAD WATERFRON

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 13/03/2020.

Elements of this project will require a marine licence. While those elements of the project will not be regulated under any planning permission, we have included a number of comments in appendix 1 which we trust will be of assistance to the developer. We

recommend consultation with our marine licencing team as early as possible to ensure all matters have been considered.

We have significant concerns with the proposed development as submitted. We recommend you should only grant planning permission if the following requirements are met and you attach the following conditions to the permission. Otherwise, we would object to this planning application.

Requirement 1: Planning submission to include outline colour and lighting design parameters to conserve the setting of the AONB, support design and place shaping.

Requirement 2: A Biosecurity Risk Assessment to be submitted.

Condition 1: Conservation Management Plan to be provided detailing the management measures and funding to be provided in order to mitigate increases in recreational use of protected sites. This must be submitted to and approved in writing by the Local Planning Authority prior to works commencing onsite.

Condition 2: Ecological method statement to be submitted to and approved in writing by the Local Planning Authority prior to works commencing onsite.

Condition 3: A planting or the lighting scheme should be submitted to and approved in writing by the Local Planning Authority prior to works commencing onsite.

Condition 4: Original conditions (2014) relating to flood risk (21 to 25) to remain on the outline permission.

Condition 5: Provision of a Construction Environment Management Plan (CEMP) prior to development commencing.

Landscape:

We concur with the Landscape Seascape and Visual Effects assessment (LSVE ES Vol2 February 2020) that effects upon landscape character and views from the AONB Holyhead mountain have the potential to fall below the level of being significant.

There are some omissions in the LSVE. There is no acknowledgement that the development lies within the setting of the AONB at Holyhead Mountain. In addition, the special qualities of the AONB (Expansive Views/Seascapes; Peace and Tranquility) haven't been included in the Landscape sensitivity assessment for LCA 1 Holyhead Mountain (Appendix 7.4). We consider these points raise the sensitivity of the eastern facing slopes of Holyhead Mountain from additional development encroachment proposed from medium (Axis assessment) to medium/high. This gives us concern that the visual aspects of the development that could have a bearing on development's integration next to the AONB could be overlooked when subsequent reserved matters are being produced.

As to whether the proposal would have a negligible effect upon views from Holyhead Mountain, this depends on how well the future development proposals incorporate landscape integration techniques such as the use of non-reflective recessive colour, colour for visual balance and unity, colour to break up development mass and reduce contrast against a coastal backdrop; and the use of limited night time lighting. We therefore advise that this information is provided prior to determination.

Requirement 1: Planning submission to include outline colour and lighting design parameters to conserve the setting of the AONB, support design and place shaping.

Section 3.5.1 Master Plan attributes may be the place to incorporate the additional information requested above. Alternatively the LPA may wish to consider requiring a separate development strategy report that brings together a description of all development components and phases; EIA planning, design and mitigation requirements; photomontage images (as this is the only representation of the potential development form so far presented and the one on which the ES is based); plus the indicative masterplan - into a concise reference document. By doing so, there is a single reference document to assist the future review and discharge of reserved matters applications and development phases as and when they come forward.

Protected Sites:

The proposals have the potential to impact on a number of protected sites in the vicinity including:

- Holy Island Coast Site of Special Scientific Interest (SSSI)
- Holy Island Coast Special Area of Conservation (SAC)
- Holy Island Coast Special Protection Area (SPA)
- North Anglesey Marine SAC
- Anglesey Terns SPA
- Liverpool Bay SPA
- The Skerries SSSI

Invasive Species

While these sites have a variety of features, we are concerned that the application has not adequately addressed the matter of Biosecurity / Invasive Non-Native Species (INNS), namely *Didemnum vexillum* (Carpet sea-squirt).

Limited information has been presented to justify the assessment of 'Negligible / Not significant' in relation to minimising spread during construction / operation activities. The applicant has not included the potential risks posed by INNS as part of the HRA assessment. NRW consider that in the absence of good biosecurity measures for construction and operational activities, the proposed development has the potential to spread marine INNS, therefore potentially impacting the features of marine SACs around Wales e.g. Menai Strait and Conwy Bay SAC.

Therefore, reference to INNS biosecurity linking to a proposal to undertake and agree and biosecurity risk assessment and management strategy should be included in the Appropriate Assessment. As a minimum the principles of this must be established upfront to ensure appropriate design of any future reserved matters applications.

Requirement 2: A Biosecurity risk assessment to be submitted.

The risk assessment shall include:

- design principles for any future applications for 'at risk' structures
- measures to control, remove or for the long-term management of invasive species both during construction and operation for terrestrial and marine environments.

Please note It would for your authority to determine whether marine biosecurity measures should also be secured through the planning regime and consultation with the Marine licencing team in NRW would be advised.

Recreational pressure:

We note that the ES acknowledges the potential for increased recreation on the Holy Island Coast SSSI and SAC (section 8.7.1 and 8.8.3). Mitigation measures are proposed but the extent of these measures is not detailed. We agree in principle that these measures will be sufficient to mitigate potential impacts but note there will be some work in agreeing appropriate levels of funding and associated detail. While it would be preferable to establish these matters upfront, (and the LPA may require this as part of their decision-making process as it ties in with other topics) we consider this could be secured via appropriate condition/ section 106 agreement.

Condition 1: Conservation Management Plan to be provided detailing the management measures and funding to be provided in order to mitigate increases in recreational use of protected sites. This must be submitted to and approved in writing by the Local Planning Authority prior to works commencing onsite.

The plan should include specific details of:

- funding and legal mechanisms (section 106/ similar)
- management activities proposed
- habitat management proposed
- methods of delivery
- mitigation areas
- provision for these in the long term (lifetime of the development)
- tenure of areas where applicable

The Code of Conduct (CoC) for boat users should extend well beyond South Stack as other popular sites such as The Skerries are within reach for small boats. One CoC to cover birds, mammals, other users of the sea etc. would be preferable.

Marine Mammals:

Our understanding is that there is no proposed underwater construction activity such as drilling and pilling (or any activity likely to generate significant noise). Based on this understanding then we agree with the conclusions of the assessment that there is no likely significant effect on North Anglesey Marine SAC, or on any Annex II or Annex IV marine mammal species. However, this should be verified with the developer. If there is likely to be underwater construction we advise that you reconsult us for further advice with regard to potential implications on marine mammals – in such a case the applicant would need to provide further information on proposed activities, and associated anticipated noise source levels and frequencies along with any mitigation measures required to inform HRA.

Ornithology:

We are satisfied with the information presented within the ES and HRA and in terms of their conclusions relating to the ornithological features which are:

- The area of the Anglesey Terns SPA that will be affected is negligible.
- Given the nature of the proposal we agree that the impact on Liverpool Bay SPA is also negligible
- Given the habitat on site we also agree with the conclusions in relation to the Holy Island Coast SPA.

Protected Species:

Bat survey report (Royal HaskoningDHV, 29/10/2019):

The two properties identified were subject to an emergence survey (Soldier's Point House and Porth y Felin House). However, only a single surveyor appeared to be present at each building at any one survey period. As a result, it's unlikely that a full coverage of either building/building complex would be achieved. Although the main building at Soldier's Point is unroofed, there are a number of roofed outbuildings attached to and at the back of this building. A single static detector was also used at each location. However, these would not be able to detect if any bats recorded had emerged from the building. This would suggest that insufficient survey effort had been put in place for the emergence surveys.

No surveyor name or NRW licence number have been provided within this document. An author name has been provided but the surveyors remain unknown.

It is acknowledged that, due to its exposed location, this coastal area of Anglesey is not an area with high numbers of bats. The species recorded during the various surveys (common and soprano pipistrelle bats) is probably a true reflection of the main species present in that area. However, brown long-eared bats are known to be present in this area and could have been missed.

Although, the emergence survey effort may have been limited, the conclusion of the report that only small numbers of pipistrelle bats are using the site for commuting and foraging is likely to be accurate. In view of information available and the conditions on site, we advise that any planning permission should attach the condition outlined below to ensure that

measures are undertaken by the developer to safeguard any bats which may be present onsite and enhance the suitability of the site for the species.

Condition 2: Ecological method statement to be submitted to and approved in writing by the Local Planning Authority prior to works commencing onsite.

As a minimum this should include:

- Reasonable Avoidance Measures (RAMs) including a licenced Bat ecologist to be present during the removal of all roofs and windows at both properties.
- Suitable roosting areas to be included within/on several of the new structures.
- Appropriate consideration for movement to/from any new roosts and foraging areas (lighting, planting etc.).
- RAMs for Great Crested Newts (further detail below)

Great Crested Newts: Pond Survey report (Royal Hoskoning DHV, 01/07/2019):

The surveyor name has been provided within the document but the licence number indicates that this is a licence issued by Natural England for working in England only. An equivalent NRW licence is required to carry out licensable works within Wales.

Both identified ponds within the search area were found to be dry during the survey. This would suggest that they would be unsuitable as breeding ponds.

During the walk over survey, not all areas between the two ponds were surveyed. It's possible that GCN may be present within the area during their terrestrial phase. Therefore, suitable RAM's that would take account of this possibility will need to be adopted during the clearance stage as per condition 1.

Terrestrial Biosecurity:

Japanese knotweed is present within this site and on adjoining land. Therefore, biosecurity measures and an eradication scheme will need to be implemented. This should be provided in line with Requirement 2 above.

Lighting and connectivity:

The submitted documents makes reference to planting to maintain and encourage ecological connectivity for bats, and the potential impact of lighting on commuting bats and other animals. We advise that the proposed mitigation should be secured as a condition of any planning permission.

Condition 3: A planting or the lighting scheme should be submitted to and approved in writing by the Local Planning Authority prior to works commencing onsite.

Flood Risk:

There is a degree of flood risk associated with the site/proposal, however we can advise that the updated Flood Consequence Assessment (Ambiental. Ref- 4821-FCA-01 Final V2) provided as an appendix in the ES demonstrates that the risks can be managed.

Condition 4: We would still request that the original conditions (2014) relating to flood risk (21 to 25) remain on the outline permission.

We would advise that since the decision in 2014 it is the Lead Local Flood Authority (loACC) who would now be advising on the surface water drainage arrangements and associated conditions.

The FCA has used the latest coastal flood boundary dataset to establish current day annual exceedance probability event levels and used the relevant guidance to factor in climate change allowances. The revised platform (minimum) levels are therefore to be 5.353mAOD with a parapet wall included (as per original condition) to reduce wave action/overtopping.

We would however advise that the development advice maps/flood zones would only be changed once physical changes have taken place i.e. land has been raised. Any changes would be for the extreme event (or the 0.1% AEP/1:1000 and ideally with allowances for climate change). Land levels below the 0.1% AEP would remain within the flood map as zone 2/DAM zone C.

There is a designated main river (Porth y Felin) flowing through the site in culverted form. Any works in, over, under or within 8m of the watercourse would require a [Flood Risk Activity Permit](#).

Foul drainage and Environmental Management:

The applicant should contact Dwr Cymru regarding the connection of the new development to foul sewer as soon as possible. We would expect to see a CEMP for this development which would go into more detail regarding specific construction methods.

Condition 5: Provision of a Construction Environment Management Plan (CEMP) prior to development commencing.

Any CEMP should include as a minimum:

- All relevant Guidance for Pollution Prevention (GPP's) should be adhered to in particular GPP5 and 6.
- Due to the size of the car parks proposed there should be interceptors located at all car parks.
- Should pollution occur, Natural Resources Wales should be notified immediately on 03000 653000.
- Failure to take appropriate pollution prevention measures resulting in pollution will result in enforcement action being taken.
- All fuel, oil and chemicals used on site should be stored away in a locked store which is bunded to 110% capacity of the total volume stored.

- Oil spill kits should be available at key locations on site for dealing with any oil spill. All staff on site should be aware of their location and trained in their use.
- Provision for appropriate waste management.
- Details of individuals responsible for specific activities

Construction and demolition work will generate controlled waste. This waste should only be disposed of to sites which can prove that they are registered as exempt, or licensed under the Environmental Permitting Regulations. There is a legal requirement (Duty of Care requirements of Section 34 the Environmental Protection Act 1990) on the developer, site owners, demolition contractor etc to ensure that the re-use or disposal of this waste is appropriate and complies with the Environmental Permitting Regulations. The Duty of Care requirements also mean that appropriate Waste Transfer Notes must be produced and kept.

Any hazardous waste generated i.e asbestos should be disposed of to a suitable permitted site. When hazardous waste is moved from one premises to another a hazardous waste consignment note must be used except under certain strict exemptions. Upon a consignment note certain specified information must be accurately detailed and recorded by specified individuals involved within the transfer of the waste. A completed consignment note must accompany hazardous waste when moved from any premises.

The applicant should ensure that if hazardous waste is being transferred to or from their premises that an accurate consignment note accompanies the waste.

Other Matters

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our [website](#) for further details.

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully

Tomos Hughes

Uwch Cyngorydd - Cynllunio Datblygu / Senior Advisor - Development Planning Cyfoeth Naturiol Cymru / Natural Resources Wales

Appendix 1

Marine Licencing:

A number of elements of this project will also require a Marine Licence. For completeness we have included comments in this regard while acknowledging that is a separate regulatory process.

Hydrodynamics:

Assessment of cumulative effects is inadequate and some projects which have been excluded should be considered. At scoping stage it was stated that-

“This scoping exercise takes account of the following two scenarios:

- 1. a scenario whereby Holyhead Marina has not been built; and, 2.*
- a scenario whereby the redeveloped Holyhead Marina is in place.*

For each environmental topic, the ‘worst case scenario’, which has the potential to result in the most adverse effects, has been considered. For example, regarding water quality, tidal flushing within the harbour would be more affected with the redeveloped Holyhead Marina in place and therefore this scenario has been considered when scoping the work required to update the 2010 ES Water Quality chapter (Chapter 12). This ensures the environmental assessment is appropriate irrespective of which scenario is realised.”

This has not been undertaken in the submitted ES and we consider it is particularly relevant to potential wave action on any new structures and to sediment movement. This may affect Benthic ecology as further detailed below. We would also request the developer further investigate the port expansion which may have progressed further by this stage under CML1931.

Benthic ecology

Table 8.7: Summary of the Value of Ecological Interest Features within the Site - Deep water mud with *Virgularia mirabilis* – Section 7 Environment (Wales) Act 2016 – NRW do not believe that this habitat is a true representation of the Section 7 habitat (Seapens and burrowing megafauna in circalittoral fine mud) due partly to the anthropogenic nature of its presence and also the habitat description and components of the habitat are not consistent with other naturally occurring forms. Furthermore, given the relative resilience of this species to smothering it is likely that this habitat will likely persist in the area around Holyhead marina as a result of the proposed construction activities.

8.4.4 Construction Phase - Direct Habitat Loss – NRW do not agree with the assessment of Minor (Adverse) in relation to loss of littoral and sublittoral biotopes (specifically rocky reef) as part of the proposed development. NRW considers that although these habitats are outside of designated sites these rocky reef areas should be considered as Annex 1 rocky reef habitat. This should give them a higher importance in any assessment. The

overarching aim of the Habitats Directive is to achieve 'favourable conservation status (FCS)' of Annex I habitats, and this aim relates to the entire occurrence of a habitat type within its natural range rather than applying only to the occurrences within the SAC network. We therefore consider that the impacts of development or activities on 'undesigned' Annex I habitat outside SACs should be assessed and adverse effects minimised or mitigated as far as possible. In addition, Article 10 of the Directive acknowledges the importance of improving the ecological coherence of the Natura 2000 network, and encourages the management of features which support the migration, dispersal and genetic exchange of wild fauna and flora, both within and outside the Natura 2000 sites.

NRW propose that areas of rock littoral and sublittoral reef likely affected under the direct footprint of the development should be calculated with appropriate mitigation measures presented in order to help mitigate the loss of this habitat. Such measures may take the form of biodiversity enhancement measures associated to the construction of the artificial marina and land reclamation waterfront development area. Further consultation with NRW is welcome to help guide this process.

Section 8.4.11 Potential Impacts of Siltation – It is not clear from the current ES what the potential indirect impacts of siltation / smothering would be as a result of the land reclamation works as a clear methodology has not been outlined. Section 8.5.12 (Mitigation of Impacts on Ecological Interest Features) mentions *'implementation of working methods during land reclamation from the sea which minimise dispersal of sediment and potential impacts on sublittoral reef habitats'*, however, it is not clear what these measures are and whether they would be effective in minimising smothering of adjacent habitats, specifically Annex 1 rocky reef habitat. NRW suggest that the applicant presents information to quantify those habitats directly and indirectly (secondary effect of smothering) affected in relation to increases of suspended sediment concentrations (SSC) as a result of construction activities.

Section 8.4.16 Operation Phase effects - Clarification from the applicant is sought as to whether the new semi-enclosed marina design will result in the need for periodic maintenance dredging to maintain sufficient water depth in the marina.

Section 8.4.2 Construction Phase effects - It is not clear from the construction phase impacts which marine habitats are likely to be affected by increased sediment inputs and deposition within the harbour. This is particularly relevant in relation to the Annex 1 rock reef habitats. Accurate hydrological modelling indicating any impacted areas and potential indirect effects on marine habitats should be outlined. Accurate figures for the direct loss of intertidal and subtidal rocky reef habitat has not been presented and assessed and should be provided to ensure appropriate mitigation is implemented.

Water Framework Directive (WFD):

WFD – General

The scoping section, section 4.2.2, states that *at the time of writing, construction methodologies were not available to inform the assessment, and the assessment has been*

undertaken “based on some key assumptions”. NRW advises that in absence of this information, a reasonable worst-case scenario must be assumed to inform the assessment.

WFD Water Quality

No evidence is provided to support the assumption made in section 4.2.1.2 that *“risks to water quality arising from the construction of the proposed development are not considered to be of concern as they would be will be small and localised in nature in comparison to the total area of the coastal water body (11.71 km²) and will be only for the duration of the construction works”.*

In relation to the WFD compliance assessment (Appendix 10.2), the applicant appears to have based their assessment around the “presence of marine structures” (e.g. pg 20). This is not appropriate, especially for the water quality topic, where the water quality can be affected by impacts from land, such as foul water discharges. As such, the water quality element in the table on pg 20 has been incorrectly completed.

WFD Biological Elements

We advise that the following matters are addressed:

- 4.2.1.2 - Direct loss of intertidal and subtidal habitat underneath the footprint of the development should be assessed as an operational phase impact, not a construction phase impact, as it will be present for the lifetime of the development (it is noted that further on in Section 4.2.2, the physical presence of the structures and changes to hydrodynamics as a result of these is considered as part of the operational phase).
- Table 4.7 incorrectly scopes out the assessment of biology (habitats) - intertidal and subtidal habitats during the operational phase, the reason for this being that they have been assessed during the impact assessment for the construction phase. We advise that this also needs to be considered as part of the operational phase impact assessment as it is a permanent loss.
- Section 5 needs to consider loss of intertidal and subtidal habitats as an operational phase impact.
- In section 5.2.1.1, which considers the assessment of hydrodynamics, it is stated that *“During operation, the reduction in space for water created by the scheme structures would decrease the tidal prism of the development site. This could potentially decrease tidal current velocities across the site, which may increase the potential for additional deposition across the intertidal and subtidal areas”.* It does not appear that these secondary effects have been assessed in the context of potential impacts to intertidal and subtidal habitats and species.
- Secondary effects to the benthic invertebrate quality elements (intertidal and subtidal) arising from changes to hydrodynamics, wave climate and sediment transport do not appear to have been considered in the assessment.

Marine Pollution

In addition to the water quality comments provided above (WFD), we also provide the following comments which relate specifically to marine water quality.

With regard to marina vessels, section 10.4.14 presumably refers to accidental spills, though this is not stated. An assessment is said to have been undertaken for impacts on water quality in the harbour (Appendix 9.3) while in section 10.5.6-10.5.7 practices for dealing with waste effluent are discussed. We welcome the provision of pump-out facilities (10.5.7). We note that Stena Line Port Ltd's Oil contingency plan will be followed should there be a spill to the marine environment. We also recommend practices mentioned in Guidance on Pollution Prevention Note 5 (GPP5) are followed. However, we do note further mitigation is listed in Appendix 9.3 pg 30-31.

The current sewer network would need to accommodate substantial increases in flows from this development. Especially where the Combined Sewer Overflows (CSOs) are currently spilling more often than current spill allowance for a shellfish water. We note that Appendix 6.3 (page 16) states "*if there were capacity issues in the existing Welsh Water foul drainage system, these would be resolved in negotiation with Welsh Water*". The nearest shellfish water is Beddmanarch Bay which is 1.6 km from the nearest Holyhead CSO and around 2.3 km from the development itself. We note that CSOs are discussed in section 10.4.9, but in relation to construction impacts rather than operational impacts.

Appendix 6.3 appears out of date as there is reference to the "*present (2010) extreme 'return period' water levels*" indicating the document has not been updated. The tidal prism ratio (pg 10) is not given as a ratio, but as percentage; it is then compared to a ratio. The comparison given indicates that the neap tide does not provide sufficient flushing, though this is not explicitly stated. The final statement of section 6.2.3 (pg 33) of this document is misleading as, though it may not be planned for there to be foul discharge to the marina or Harbour, there are a number of CSO's which discharge there under overflow conditions. Much of the rest of the information in the water quality section is the same as in Chapter 10 of the ES. However, we note the tidal prism ratio given in section 6.2.5 (pg 34) is different from that given in section 3.4 (pg 10), presumably due to the difference between marina tidal prism and harbour tidal prism. Thus, while the marina may be well-flushed according to this section (for springs at least and only just for neaps), the harbour is not and this is not assessed. However, we do note there are best practice measures in place for discharges to the marina from vessels and should these be followed, it would not be expected that there would be a water quality issue from the marina.

We note that suspended sediment (or turbidity) has not been assessed in terms of water quality. However, there is a suggestion that SSC would rise by 1 mg/l above background in Chapter 4 (pg 42); there is no methodology provided as to how this value has been determined. Such a low value would not be expected to have an impact on water quality.

In terms of chemical contamination, the applicant appears to be basing their assessment around land reclamation. Chemical contamination may arise from spills at sea and on-land works; these have not been accounted for. However, the CEMP and oil pollution prevention plan should mitigate for these.

Appendix E

Sediment Chemical Analysis Results

Table E.1 Heavy metal and organo-tins concentrations compared to Cefas Action Levels (mg/kg)

Sample Location	Sub sample depth	Arsenic	Cadmium	Chromium	Copper	Mercury	Nickel	Lead	Zinc	DBT	TBT
VB-01	0.0m	10.6	0.23	44.8	31.2	0.19	28.8	52.1	140	<LOD	<LOD
VB-01	0.75m	11.1	0.31	41	30.2	0.25	27.1	62	148	<LOD	<LOD
VB-01	1.5m	13.8	0.19	41.7	35.6	0.35	29.1	81.9	149	<LOD	<LOD
VB-03	0.0m	11.3	0.38	58.6	36.4	0.24	33.5	59.4	158	<LOD	<LOD
VB-03	0.6m	14.2	0.23	47	37.4	0.44	30.9	88.4	192	0.076	0.026
VB-03	1.2m	14.4	0.2	43.2	40.1	0.39	29.5	99.7	154	<LOD	<LOD
VB-04	0.0m	12.4	1.35	44.8	31.4	0.29	28.9	67.5	264	<LOD	<LOD
VB-06	0.0m	10.3	0.2	46.9	27.6	0.15	29.9	46.4	134	<LOD	<LOD
VB-06	0.5m	11.7	0.25	43	35.1	0.26	29.2	66.2	159	<LOD	<LOD
VB-06	1.0m	26.5	0.13	43.7	26.6	0.17	24.7	76.6	105	<LOD	<LOD
VB-07b	0.0m	14.4	0.23	46.5	36.8	0.38	27.2	83.9	144	<LOD	<LOD
VB-10	0.0m	9.7	0.19	39	27.2	0.17	25.4	44.9	125	0.011	<LOD
VB-10	0.75m	12.5	0.25	41.1	32.8	0.33	28.2	80.3	156	<LOD	<LOD
VB-10	1.5m	11.1	0.32	44.6	44.1	0.02	36.5	13.9	77.1	<LOD	<LOD
AL1		20	0.4	40	40	0.3	20	50	130	0.1	0.1
AL2		100	5	400	400	3	200	500	800	0	1

Table E.2 PAH concentrations compared to Cefas Action Levels (mg/kg)

Sample Location	Sub sample depth	Acenaphthene	Acenaphthylene	Anthracene	Benzo[a]anthracene	Benzo[a]pyrene	Benzo[b]fluoranthene	Benzo[g,h,i]perylene	Benzo[e]pyrene	Benzo[k]fluoranthene	C1-Napthalenes	C1-Phenanthrenes	C2-Napthalenes
VB-01	0.0m	0.0215	0.012	0.0345	0.137	0.193	0.3	0.212	0.239	0.11	0.187	0.194	0.164
VB-01	0.75m	0.0313	0.0236	0.0633	0.221	0.398	0.538	0.415	0.414	0.235	0.21	0.244	0.184
VB-01	1.5m	0.0231	0.0107	0.0366	0.153	0.185	0.245	0.202	0.208	0.12	0.123	0.171	0.133
VB-03	0.0m	0.0227	0.0146	0.0453	0.164	0.23	0.347	0.241	0.275	0.12	0.23	0.222	0.19
VB-03	0.6m	0.0205	0.0214	0.0558	0.195	0.33	0.411	0.337	0.336	0.195	0.195	0.223	0.158
VB-03	1.2m	0.0149	0.0111	0.0398	0.13	0.161	0.196	0.149	0.168	0.116	0.106	0.15	0.107
VB-04	0.0m	0.0234	0.0131	0.0453	0.163	0.239	0.326	0.232	0.259	0.143	0.218	0.217	0.187
VB-06	0.0m	0.0138	0.00797	0.0254	0.0956	0.126	0.223	0.156	0.172	0.0919	0.17	0.159	0.148
VB-06	0.5m	0.0208	0.0153	0.05	0.178	0.296	0.393	0.304	0.314	0.194	0.203	0.204	0.178
VB-06	1.0m	0.0183	0.0211	0.0655	0.253	0.34	0.337	0.267	0.302	0.179	0.151	0.196	0.133
VB-07b	0.0m	0.0624	0.0358	0.149	0.53	0.577	0.547	0.418	0.469	0.271	0.162	0.37	0.194
VB-10	0.0m	0.0212	0.0136	0.0406	0.152	0.236	0.332	0.25	0.271	0.137	0.204	0.196	0.167
VB-10	0.75m	0.029	0.0209	0.064	0.241	0.41	0.497	0.408	0.405	0.255	0.228	0.263	0.212
VB-10	1.5m	0.00137	<LOD	0.00123	0.00349	0.0047	0.0143	0.0111	0.0135	0.00242	0.0254	0.0234	0.02
	AL1	0.1											

Table E.3 PAH concentrations compared to Cefas Action Levels (mg/kg) (cont.)

Sample Location	Sub sample depth	C3-Naphthalenes	Chrysene	Dibenzo[a,h]anthracene	Fluoranthene	Fluorene	Indeno[1,2,3-cd]pyrene	Napthalene	Perylene	Phenanthrene	Pyrene	Total Hydrocarbon
VB-01	0.0m	0.131	0.19	0.0498	0.229	0.0357	0.23	0.076	0.0569	0.174	0.252	80.9
VB-01	0.75m	0.169	0.307	0.089	0.387	0.0461	0.471	0.0979	0.107	0.247	0.513	30.8
VB-01	1.5m	0.116	0.174	0.0375	0.216	0.0293	0.198	0.0529	0.0576	0.16	0.301	36.3
VB-03	0.0m	0.145	0.232	0.0544	0.297	0.0461	0.26	0.167	0.0662	0.228	0.307	18.3
VB-03	0.6m	0.14	0.261	0.0652	0.34	0.0369	0.359	0.0846	0.0797	0.219	0.514	2.3
VB-03	1.2m	0.106	0.149	0.0304	0.189	0.0256	0.154	0.0518	0.0408	0.14	0.368	67.1
VB-04	0.0m	0.135	0.207	0.0513	0.276	0.0441	0.253	0.0953	0.0658	0.218	0.336	41.5
VB-06	0.0m	0.107	0.131	0.0358	0.16	0.0321	0.177	0.0736	0.0455	0.136	0.16	27.6
VB-06	0.5m	0.145	0.247	0.0599	0.319	0.0401	0.339	0.0911	0.072	0.22	0.418	7.44
VB-06	1.0m	0.12	0.274	0.0608	0.341	0.0336	0.277	0.0818	0.0828	0.209	0.683	429
VB-07b	0.0m	0.146	0.558	0.0982	0.921	0.0748	0.449	0.0859	0.136	0.6	0.986	113
VB-10	0.0m	0.128	0.209	0.056	0.261	0.0393	0.273	0.0887	0.0689	0.191	0.303	13.7
VB-10	0.75m	0.169	0.319	0.0853	0.409	0.045	0.454	0.114	0.0922	0.267	0.567	47.8
VB-10	1.5m	0.0174	0.0122	0.00179	0.00641	0.00592	0.00614	0.00898	0.0049	0.0194	0.0103	8.91
	AL1	0.1										

Table E.4 PCB concentrations compared to Cefas Action Levels (mg/kg)

Sample Location	Sub sample depth	CB101	CB105	CB110	CB118	CB128	CB138	CB141	CB149	CB151	CB153	CB156	CB158	CB170
VB-01	0.0m	0.00061	0.00029	0.00061	0.00096	0.00014	0.00089	<LOD	0.00058	0.00011	0.00091	0.0001	0.00014	0.00017
VB-01	0.75m	0.00057	0.00013	0.00044	0.00071	<LOD	0.00075	<LOD	0.00062	0.0001	0.001	<LOD	<LOD	0.00013
VB-01	1.5m	<LOD	<LOD	<LOD	<LOD	<LOD	<LOD	<LOD	<LOD	<LOD	<LOD	<LOD	<LOD	<LOD
VB-03	0.0m	0.00066	0.00028	0.00062	0.00113	0.00015	0.00109	<LOD	0.00058	0.00013	0.00114	0.00008	0.00018	0.00015
VB-03	0.6m	0.00016	<LOD	0.00016	0.00021	<LOD	0.00022	<LOD	0.0002	<LOD	0.00029	<LOD	<LOD	<LOD
VB-03	1.2m	<LOD	<LOD	<LOD	<LOD	<LOD	<LOD	<LOD	<LOD	<LOD	<LOD	<LOD	<LOD	<LOD
VB-04	0.0m	0.00044	0.00022	0.00042	0.00063	0.00017	0.00054	<LOD	0.00037	0.00011	0.00068	0.00014	0.00013	0.00022
VB-06	0.0m	0.00039	0.00021	0.00034	0.00061	0.00008	0.0007	<LOD	0.00028	<LOD	0.00058	<LOD	<LOD	<LOD
VB-06	0.5m	0.00119	0.00056	0.00099	0.00184	0.0002	0.00122	<LOD	0.00091	0.00018	0.00168	0.0001	0.00021	0.0002
VB-06	1.0m	<LOD	<LOD	<LOD	<LOD	<LOD	<LOD	<LOD	<LOD	<LOD	<LOD	<LOD	<LOD	<LOD
VB-07b	0.0m	<LOD	<LOD	<LOD	0.00009	<LOD	<LOD	<LOD	<LOD	<LOD	<LOD	<LOD	<LOD	<LOD
VB-10	0.0m	0.0008	0.00036	0.00072	0.00129	0.00015	0.00094	<LOD	0.00065	0.00018	0.00114	0.00009	<LOD	0.00021
VB-10	0.75m	0.00037	0.00013	0.00028	0.00045	<LOD	0.00044	<LOD	0.00041	0.00011	0.00059	<LOD	<LOD	0.00009
VB-10	1.5m	<LOD	<LOD	<LOD	<LOD	<LOD	<LOD	<LOD	<LOD	<LOD	<LOD	<LOD	<LOD	<LOD

Table E.5 PCB concentrations compared to Cefas Action Levels (mg/kg) (cont.)

Sample Location	Sub sample depth	CB18	CB180	CB183	CB187	CB194	CB28	CB31	CB44	CB47	CB49	CB52	CB66	Sum of 25 congeners
VB-01	0.0m	0.00038	0.00034	0.0001	0.0003	0.00009	0.00083	0.00103	0.00042	0.00016	0.00051	0.00069	0.00112	0.01148
VB-01	0.75m	0.00019	0.00036	0.00011	0.00036	0.00015	0.00033	0.00045	0.00025	0.00009	0.00032	0.0004	0.00052	0.00798
VB-01	1.5m	<LOD	<LOD	<LOD	<LOD	<LOD	<LOD	0.0001	<LOD	<LOD	<LOD	<LOD	<LOD	0.0001
VB-03	0.0m	0.00047	0.00038	0.00011	0.00033	0.00011	0.00092	0.00113	0.00043	0.00019	0.00057	0.00075	0.00128	0.01286
VB-03	0.6m	0.00015	0.0001	<LOD	0.00009	<LOD	0.00016	0.00022	0.00009	<LOD	0.00013	0.00019	0.00021	0.00258
VB-03	1.2m	0.00013	<LOD	<LOD	<LOD	<LOD	0.00009	0.00015	<LOD	<LOD	<LOD	0.00011	<LOD	0.00048
VB-04	0.0m	0.00032	0.00034	0.00016	0.00032	0.00016	0.00065	0.00077	0.00036	0.00017	0.00052	0.00062	0.00093	0.00939
VB-06	0.0m	0.0003	0.00026	<LOD	0.00016	<LOD	0.0006	0.00084	0.00025	0.00011	0.00036	0.00044	0.00072	0.00723
VB-06	0.5m	0.00059	0.00059	0.00015	0.00054	0.0002	0.00171	0.00186	0.00084	0.00043	0.00127	0.0014	0.0026	0.02146
VB-06	1.0m	0.0001	<LOD	<LOD	<LOD	<LOD	<LOD	0.00012	<LOD	<LOD	<LOD	0.0001	<LOD	0.00032
VB-07b	0.0m	0.00009	<LOD	<LOD	<LOD	<LOD	0.00008	0.0001	<LOD	<LOD	<LOD	0.0001	<LOD	0.00046
VB-10	0.0m	0.00045	0.00042	0.00014	0.0003	0.00014	0.00107	0.0012	0.0006	0.00023	0.00069	0.00088	0.00152	0.01417
VB-10	0.75m	0.00019	0.00025	0.00011	0.0002	0.0001	0.00028	0.00036	0.00022	<LOD	0.00023	0.00031	0.00038	0.0055
VB-10	1.5m	0.00026	<LOD	<LOD	<LOD	<LOD	0.00014	0.00019	<LOD	<LOD	<LOD	0.00014	<LOD	0.00073
													AL1	0.02
													AL2	0.2