

REPORT

Holyhead Waterfront Regeneration Scheme ES

Appendix 6.2: Scoping Opinions

Client: Conygar Holyhead Ltd.

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

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Date: 14 June 2021

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A1 IACC Scoping Opinion



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

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DEDDF CYNLLUNIO GWLAD A THREF 1990 / TOWN AND COUNTRY PLANNING ACT 1990

RHEOLIADAU CYNLLUNIO GWLAD A THREF (ASESIAD AR YR EFFAITH AMGYLCHEDDOL) (CYMRU) 2017 / TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) (WALES) REGULATIONS 2017

Barn sgopio ar gyfer cynllun adfywio defnydd cymysg yn cynnwys marina newydd, adfer tir o'r môr, datblygiadau preswyl newydd ynghyd â defnyddiau masnachol, hamdden ac adwerthol a'r isadeiledd cysylltiedig yn / Scoping opinion for a mixed use regeneration scheme to include a new marina, reclamation of land from the sea, new residential developments together with commercial, leisure and retail uses and associated infrastructure at

Glannau Caergybi, Caergybi / Holyhead Waterfront, Holyhead

1.0 Cyflwyniad

- 1.1 25 Medi 2020, gofynnodd yr ymgeisydd, Conygar Ltd., am Farn Gwmpasu gan Gyngor Sir Ynys Môn (y Cyngor) ar gyfer y cynnig uchod. Yn unol â pharagraff 14(4) Rheoliadau Cynllunio Gwlad a Thref (Asesiad o'r Effaith Amgylcheddol) (Cymru) 2017, rhaid i'r Cyngor ymgynghori ar y Farn Gwmpasu a'i mabwysiadu o fewn wyth wythnos (sef yr 20fed o Dachwedd 2020), oni chytunir fel arall gyda'r ymgeisydd.
- 1.2 Fel y nodwyd ym mharagraff 14 (1) y Rheoliadau, caiff person sy'n bwriadu gwneud cais Asesiad o'r Effaith Amgylcheddol ofyn i'r awdurdod cynllunio perthnasol ddatgan ei farn ynghylch cwmpas a lefel manylder y wybodaeth sydd i'w chyflwyno yn y datganiad amgylcheddol ("barn gwmpasu"). Yn y cais dan baragraff (1) rhaid cael:
- (i) cynllun y mae modd adnabod y tir ohono;
 - (ii) disgrifiad byr o natur a phwrpas y datblygiad gan gynnwys ei leoliad a'i allu technegol;
 - (iii) ei effeithiau sylweddol tebygol ar yr amgylchedd; ac
 - (iv) unrhyw wybodaeth neu sylwadau eraill y byddai'r person sy'n gwneud y cais am eu rhoi neu eu gwneud;
- 1.3 Cred y Cyngor fod yr Adroddiad Cwmpasu a gyflwynwyd gan yr ymgeisydd i gefnogi ei Gais Cwmpasu dan baragraff 14 (1) yn cwrdd yn ddigonol â'r meini prawf uchod fel bod modd i'r Cyngor gyflwyno Barn Gwmpasu. Ymgynghorodd y Cyngor â'r holl gyrff statudol a swyddogion mewnol arbenigol wrth baratoi'r Farn Gwmpasu hon. Yn strwythur y Farn Gwmpasu hon, felly, ceir:
- Cefndir;
 - Ymatebion Swyddogion y Cyngor;
 - Ymatebion Cyrff Statudol yr ymgynghorwyd â nhw; a
 - Casgliadau.

2.0 Casgliad

- 2.1 Mae Cynllun Adfywio Glannau Caergybi a gynigir gan Conygar Holyhead Ltd, ar Ynys Gybi wedi'i leoli yn Harbwr Newydd Caergybi, ger y Morglawdd Mawr. Cyflwynwyd Datganiad Amgylcheddol ar gyfer y Datblygiad Arfaethedig i Gyngor Sir Ynys Môn (y Cyngor) yn 2010 (Datganiad Amgylcheddol 2010) i gefnogi Cais Cynllunio Amlinellol (gyda'r holl faterion wedi'u cadw'n ôl).
- 2.2 Rhoddwyd Caniatâd Cynllunio Amlinellol i'r Datblygiad Arfaethedig, gyda nifer o amodau cynllunio, yn 2014 (cyf.19C1046A / EIA / ECON) ("caniatâd 2014"). Roedd Amod 3 yn ei gwneud yn ofynnol i'r ymgeisydd gyflwyno Materion a Gedwir yn Ôl o fewn pum mlynedd i ddyddiad y caniatâd hwn (sef 13 Chwefror 2019). Ni chyflwynodd yr ymgeisydd gais Materion a Gedwir yn Ôl cyn i'r dyddiad ddod i ben ac, o'r herwydd, mae'r dyddiad erbyn yr hyn y gallai gyflwyno Materion a Gedwir yn Ôl, bellach, wedi dod i ben.
- 2.3 O ganlyniad i hyn, cyflwynodd yr ymgeisydd gais Adran 73 (a.73) i'r Cyngor ym mis Mawrth 2020 (cyf. VAR / 2020/20 / EIA) er mwyn, yn bennaf, ymestyn y cyfnod o fewn yr hyn y gellir cyflwyno Ceisiadau Materion a Gedwir yn Ôl (Amod 3) ac ymestyn y cyfnod amser ar gyfer y gwaith datblygu sy'n mynd rhagddo (Amod 4). Lluniwyd Datganiad Amgylcheddol newydd a chyfoes ('Datblygiad Amgylcheddol 2020') i gefnogi'r cais a.73 er mwyn adlewyrchu'r newidiadau amgylcheddol, economaidd gymdeithasol, polisi a deddfwriaethol ers Datblygiad Amgylcheddol gwreiddiol 2010.
- 2.4 Er bod yr Uwchgynllun Darluniadol a gyflwynwyd gyda'r cais a.73 union yr un fath â'r un a gymeradwywyd gan ganiatâd 2014, amlygodd trafodaethau cyn ymgeisio ar y Materion a Gedwir yn ôl nifer o newidiadau yr oedd yr ymgeisydd yn ceisio eu gwneud oedd yn anghyson â chaniatâd 2014. Ni allai'r IACC dderbyn y newidiadau hyn fel rhan o ganiatâd 2014 ac felly, byddai'r ymgeisydd angen caniatâd cynllunio newydd ar gyfer y gwaith hwn.
- 2.5 O'r herwydd, bydd angen y cydsyniadau a ganlyn i ganiatáu adeiladu a gweithredu'r Datblygiad Arfaethedig:
- Caniatâd Cynllunio Manwl gan y Cyngor ar gyfer pob gwaith uwchlaw y Distyll Cymedrig;
 - Trwydded Forol gan Gyfoeth Naturiol Cymru ar gyfer yr holl waith islaw Penllanw Cymedrig y Gorllanw; a
 - Gorchymyn Adolygu Harbwr gan Lywodraeth Cymru.
- 2.6 Mae'r ymgeisydd wedi cyflwyno Cais Cwmpasu ar gyfer pob un o'r tri uchod. Er mwyn bod yn gyson, bydd y Cyngor yn rhannu ein Barn Cwmpasu gyda Chyfoeth Naturiol Cymru a Llywodraeth Cymru. Bydd hyn yn sicrhau bod yr Asesiad o'r Effaith Amgylcheddol yn rhoi digon o sylw i'r hyn sy'n ofynnol i bob corff cydsynio.

3.0 Ymatebion y Cyrff yr Ymgynghorodd y Cyngor â Nhwy

3.1 Polisi Cynllunio

- 3.1.1 Byddai'r Gwasanaeth Polisi Cynllunio ar y Cyd yn disgwyl i'r Asesiad o'r Effaith Amgylcheddol gynnwys crynodeb o'r holl bolisiau cynllunio cenedlaethol a lleol perthnasol, gan gynnwys asesiad o sut mae'r datblygiad arfaethedig yn cydymffurfio â'r amcanion polisi, neu'n eu cyflawni. Mae'r Gwasanaeth hwn yn cyflwyno crynodeb o'r bolisiau cynllunio cenedlaethol a lleol perthnasol isod.

3.1.2 Polisi Cynllunio Cenedlaethol – Polisi Cynllunio Cymru (PCC) (Argraffiad 10)

- 3.1.2.1 Tai: O ran codi tai, dywed Polisi Cynllunio Cymru: *"Dylai datblygiadau tai newydd mewn ardaloedd trefol a gwledig gynnwys cymysgedd o fathau, deiliadaeth, a meintiau tai'r farchnad agored a thai fforddiadwy i ddiwallu'r amrywiaeth o anghenion tai dynodedig a chyfrannu at ddatblygu cymunedau cynaliadwy a chydlynus..... mae manteisio i'r eithaf ar dir addas a ddatblygwyd o'r blaen ac/ neu na ddefnyddiwyd ddigon arno yn fodd o hybu adfywiad ac, ar yr un pryd, leddfu'r pwysau i ddatblygu ar safleoedd maes glas"* (Paragraffau 4.2.1 a 4.2.17).
- 3.1.2.2 Twristiaeth: *"Gall twristiaeth fod yn gatalydd ar gyfer adfywio, gwella'r amgylchedd adeiledig a diogelu'r amgylchedd ... Mae'r system gynllunio'n annog twristiaeth lle mae'n cyfrannu at ddatblygiad economaidd, cadwraeth, arallgyfeirio gwledig, adfywio trefol a chynhwysiant cymdeithasol, gan gydnabod anghenion ymwelwyr a rhai cymunedau lleol"* (Paragraffau 5.5.1-5.5.2).
- 3.1.2.3 Seilwaith: *"Mae seilwaith digonol ac effeithlon, gan gynnwys gwasanaethau megis cyfleusterau addysg ac iechyd, ynghyd â thrafnidiaeth, cyflenwad dŵr, carthffosydd, rheoli gwastraff yn gynaliadwy, trydan a nwy (y cyfleustodau) a thelathrebu, yn hanfodol ar gyfer cynaliadwyedd economaidd, cymdeithasol ac amgylcheddol."* (Paragraff 3.57).
- 3.1.2.4 Manwerthu a Masnachol: *"Mae canolfannau manwerthu a masnachol yn ganolfannau gweithgaredd cymdeithasol ac economaidd ac yn ganolbwynt ar gyfer ystod amrywiol o wasanaethau sy'n cefnogi anghenion cymunedau lleol."* (Paragraff 4.3.1).

- 3.1.2.5 Amgylchedd: *"Rhaid amddiffyn nodweddion arbennig ac unigryw a rhinweddau cynhenid yr amgylchedd naturiol ac adeiledig yn eu rhinwedd eu hunain, a hynny am resymau hanesyddol, golygfaol, esthetig a chadwraeth natur. Mae'r nodweddion hyn yn rhoi eu hunaniaeth unigryw a'u hynodrwydd i leoedd ac yn darparu ar gyfer profiadau diwylliannol a ffyrdd iach o fyw"* (Paragraff 6.0.2)
- 3.1.2.6 Mae Adran 5.3 o Bolisi Cynllunio Cymru yn rhoi arweiniad pellach mewn perthynas â datblygiadau harbwr:-
- 3.1.2.7 *"Mae porthladdoedd swyddogaethol a deniadol, harbyrau, marinas a dyfrffyrdd mewndirol, sy'n cwrdd â'r galw ar hyn o bryd ac yn y dyfodol, yn gwneud Cymru yn lleoliad deniadol i fusnesau, ymwelwyr a chlodiant cludo nwyddau. Mae cefnogaeth a buddsoddiad yn y cyfleusterau hyn yn cynnig potensial i roi hwb uniongyrchol i'r economi, o'r defnydd mwyaf a wneir o'r cyfleusterau, ac yn anuniongyrchol trwy'r cyfleoedd y mae gwell seilwaith trafnidiaeth forwrol yn eu rhoi i sectorau eraill (yn genedlaethol ac yn rhyngwladol). (Paragraff 5.3.14)*
- 3.1.2.8 Ceir canllawiau pellach yn ymwneud â rôl harbyrau a'u gweithrediadau presennol ac yn y dyfodol, gan gynnwys opsiynau ar gyfer ehangu ac arallgyfeirio, yng Nghynllun Morol Cenedlaethol Cymru.
- 3.1.3 Polisi Cynllunio Cenedlaethol – Deddf Llesiant Cenedlaethau'r Dyfodol 2015
- 3.1.3.1 Yn ogystal â'r fframwaith polisi cenedlaethol a lleol, dylai'r ymgeisydd hefyd gynnwys asesiad yn erbyn y fframwaith deddfwriaethol perthnasol yng Nghymru. Yn benodol, dylid rhoi sylw i Ddeddf Llesiant Cenedlaethau'r Dyfodol 2015.
- 3.1.3.2 Mae Deddf Llesiant Cenedlaethau'r Dyfodol yn ei gwneud yn ofynnol i gyrff cyhoeddus yng Nghymru feddwl am effaith tymor hir eu penderfyniadau, gweithio'n well gyda phobl, cymunedau, a chyda'i gilydd, ac atal problemau parhaus fel tlodi, anghydraddoldebau iechyd a newid hinsawdd. Mae'r Ddeddf yn ei gwneud yn ofynnol i gyrff cyhoeddus (gan gynnwys y Cyngor) ddatblygu'n gynaliadwy ac mae'n gosod dyletswydd gyfreithiol arnynt i wneud hynny.
- 3.1.3.4 Mae Rhan 2 o'r Ddeddf yn diffinio datblygu cynaliadwy fel *"y broses o wella lles economaidd, cymdeithasol, amgylcheddol a diwylliannol Cymru trwy weithredu, yn unol â'r egwyddor datblygu cynaliadwy, gyda'r nod o gyflawni'r nodau llesiant"*. Yn y cyd-destun hwn, mae'r egwyddor datblygu cynaliadwy'n golygu bod yn rhaid i gyrff cyhoeddus *"weithredu mewn modd sy'n ceisio sicrhau bod anghenion y presennol yn cael eu diwallu heb beryglu gallu cenedlaethau'r dyfodol i ddiwallu eu hangen eu hunain"*.
- 3.1.3.5 Mae Deddf Cynllunio (Cymru) 2015 yn ei gwneud yn ofynnol i unrhyw gorff statudol sy'n cyflawni swyddogaeth gynllunio arfer y swyddogaethau hynny yn unol ag egwyddorion datblygu cynaliadwy, fel y'u nodir yn Neddf Llesiant Cenedlaethau'r Dyfodol 2015.
- 3.1.3.6 Yn yr Asesiad o'r Effaith Amgylcheddol, felly, dylid bod cyfeiriad at sut mae'r datblygiadau arfaethedig yn cwrdd â'r saith nod llesiant fel y'u diffinnir yn y Ddeddf, fel bod modd i'r Cyngor gynnal ei asesiad ei hun. Dylid hefyd ystyried deddfwriaeth berthnasol arall, megis Deddf yr Amgylchedd (Cymru) 2016.
- 3.1.4 Polisi Cynllunio Lleol - Cynllun Datblygu Lleol ar y Cyd Gwynedd a Môn (2016)
- 3.1.4.1 Yn y tabl a ganlyn, rhoddir trosolwg byr o bolisiâu perthnasol y cynllun lleol, sy'n berthnasol i'r datblygiad arfaethedig: -

Polisi	Eglurhad
PS 1: Yr Iaith Gymraeg a'r Diwylliant Cymreig	Mae'r polisi'n nodi ei fod yn ofynnol hyrwyddo a chefnogi'r Gymraeg. Mae arweiniad yn y polisi sy'n ymwneud â'r gofyn i gyflwyno Datganiad Iaith Gymraeg / Asesiad Effaith ar gyfer gwahanol fathau o ddatblygiad. Ymhellach, amlygir yn y polisi y disgwyliad sy'n ymwneud â chynllun arwyddion dwyieithog a'r disgwyl y bydd enwau Cymraeg yn cael eu defnyddio ar gyfer datblygiadau newydd. Yn unol â maen prawf 2 y polisi, bydd angen Asesiad o'r Effaith ar y Gymraeg.
PS 2 Isadeiledd a chyfraniadau datblygwyr	Mae disgwyl i ddatblygiadau newydd sicrhau bod isadeiledd hanfodol (naill ai ar y safle neu i wasanaethu'r safle) un ai ar gael yn barod neu y caiff ei gyflwyno'n amserol er mwyn gwneud y cynnig yn dderbyniol trwy amod neu rwymedigaeth cynllunio.

ISA 1 Darpariaeth Isadeiledd	Os yw cynnig yn creu angen uniongyrchol am isadeiledd newydd neu well, ac os na chaiff hwn ei ddarparu gan gwmni gwasanaeth neu isadeiledd, yna rhaid i'r datblygiad ei ariannu. Gellir ceisio cyfraniad ariannol i sicrhau gwelliannau i isadeiledd, cyfleusterau, gwasanaethau a gwaith cysylltiedig, os yw'r rheini'n angenrheidiol i wneud cynnig yn dderbyniol.
ISA 2: Cyfleusterau Cymunedol	Mae'n rhoi arweiniad ar ddarparu cyfleusterau newydd fel rhan o ddatblygiadau gyda nifer o amodau.
ISA 5: Darparu Llecynnau Agored Mewn Datblygiadau Tai Newydd	Bydd disgwyl i gynigion tai newydd ar gyfer 10 neu fwy o dai, mewn ardaloedd lle na all llecynnau agored fodloni anghenion y datblygiad tai arfaethedig, gyflwyno mannau agored addas yn unol â safonau meincnodi <i>Fields in Trust</i> o 2.4 hectar fesul pob 1,000 o'r boblogaeth.
PS 4: Trafnidiaeth Gynaliadwy, Datblygiad a Hygyrchedd	Dylai pob datblygiad gael ei leoli fel ei fod yn lleihau'r angen i deithio. Bydd y Cynghorau'n cefnogi gwelliannau trafnidiaeth fydd yn ei gwneud yn haws defnyddio pob dull teithio, ond, yn arbennig, mynd ar droed, beic a chlodiant cyhoeddus.
TRA 1: Datblygiadau Rhwydwaith Cludiant	Caniateir gwelliannau i'r rhwydwaith cludiant presennol os gellir cydymffurfio â nifer o feini prawf.
TRA 2: Safonau Parcio	Dylai'r ddarpariaeth parcio ar gyfer pob dull o deithio fod yn unol â Safonau Parcio'r Cynghorau.
TRA 4: Rheoli Effeithiau Cludiant	Dylid cynllunio a dylunio datblygiad mewn ffordd sydd yn hyrwyddo'r dulliau mwyaf cynaliadwy o deithio gan roi sylw i'r hierarchaeth defnyddwyr. Gwrthodir cynigion a fyddai'n peri niwed annerbyniol i weithrediad diogel ac effeithlon y briffordd, cludiant cyhoeddus a rhwydweithiau cludiant eraill gan gynnwys llwybrau i gerddwyr, beicwyr, hawliau tramwy cyhoeddus a llwybrau marchogaeth.
PS 5: Datblygu Cynaliadwy	Dylai pob cynnig ddangos sut y mae'n gyson ag egwyddor datblygu cynaliadwy.
PS 6: Lliniaru Effeithiau Newid Hinsawdd ac Addasu Iddynt	Polisi wedi'i seilio ar feini prawf sy'n ei gwneud yn ofynnol i gynigion ddangos sut maent wedi ystyried yn llawn fesurau i liniaru effeithiau newid yn yr hinsawdd.
PCYFF 1: Ffiniau datblygu	Caniateir cynigion o fewn ffiniau datblygu os ydynt yn unol â pholisïau eraill yn y cynllun.
PCYFF 2: Meini Prawf Datblygu	Mae'n rhoi arweiniad ar sut y dylai cynigion gydymffurfio â pholisïau cynllun perthnasol, polisïau Cynllunio Cenedlaethol a chanllawiau. Cyflwynir arweiniad pellach hefyd sy'n ymwneud ag egwyddor gyffredinol datblygu.
PCYFF 3: Dylunio a Siapio Lle	Bydd disgwyl i bob cynnig arddangos dyluniad o ansawdd uchel sy'n rhoi ystyriaeth lawn i'w gyd-destun. Caiff dyluniad arloesol sy'n arddangos effeithlonrwydd ynni ei annog yn rhannol.
PCYFF 4: Dylunio a Thirweddau	Dylai pob cynnig ddangos sut y rhoddwyd sylw i'r hyn sydd o'i gwmpas gan gynnwys rhoi sylw dyledus i'r Asesiad o Gymeriad Tirwedd neu'r Asesiad o Gymeriad Morlun
PCYFF 5 Rheoli Carbon	Bydd angen i ddatblygiadau ddangos sut y rhoddwyd sylw i'r hierarchaeth ynni ym Mholisi PS6 a manteisio i'r eithaf ar gyfraniad technoleg ynni adnewyddadwy neu garbon isel.
PCYFF 6: Cadwraeth Dŵr	Dylai'r holl gynigion gynnwys mesurau cadwraeth neu liniaru dŵr lle bo hynny'n ymarferol, i leihau neu leddfu llifogydd lle bo modd, er mwyn lleihau'r dŵr wyneb sy'n llifo i ffwrdd a lleihau ei gyfraniad i risg llifogydd mewn mannau eraill. Dylid cyflwyno Datganiad Cadwraeth Dŵr gyda chynigion sy'n fwy nag 1,000 m².
PS 13: Darparu Cyfle ar gyfer Economi Ffyniannus	Wrth anelu i amddiffyn a gwella amgylchedd naturiol ac adeiledig, byddir yn hwyluso twf economaidd.
CYF 1: Gwarchod, Dynodi ac Amddiffyn Tir ac Unedau ar Gyfer Defnydd Cyflogaeth	Cydnabyddir bod gan y safleoedd hyn rôl bwysig wrth gynnal a sicrhau cyfleoedd cyflogaeth yn y dyfodol, ac, felly, y bwriad yw eu hamddiffyn at y dibenion hynny.
CYF 3: Defnyddiau Ategol ar Safleoedd Cyflogaeth	Gwarchodir y safleoedd a enwir ym Mholisi CYF 1 ac fel y'u nodir ar y Mapiau Cynigion ar gyfer defnydd cyflogaeth/busnes yn unol â'r hyn a nodir ym Mholisi CYF1. Mewn amgylchiadau eithriadol, fe fyddai'n bosib ystyried ceisiadau ar gyfer defnyddiau ategol.
CYF 5: Defnyddiau Amgen o Safleoedd Cyflogaeth Presennol	Dim ond mewn achosion arbennig y caniateir cynigion i ryddhau tir yn Nefnydd Dosbarth B1, B2 neu B8 ar safleoedd cyflogaeth

	bresennol sydd wedi cael eu gwarchod yn unol â Pholisi CYF 1 ar gyfer defnyddiau amgen, a hynny ar yr amod y gellir cwrdd ag un neu fwy o'r meini prawf a nodwyd.
CYF 8: Ardal Adfywio Caergybi	Yn cefnogi cynigion o fewn Ardal Adfywio Caergybi fydd yn cynorthwyo i drawsnewid yr ardal gan wneud Caergybi yn lleoliad deniadol i fyw a gweithio ynddo, i ymweld ag o ac i'w fwynhau
PS14: Yr Economi Ymwelwyr	Wrth sicrhau cysondeb â'r economi leol a chymunedau lleol a sicrhau bod yr amgylchedd naturiol, adeiledig a hanesyddol yn cael ei warchod, bydd y Cynghorau'n cefnogi datblygu diwydiant twristiaeth leol fydd yn fwrwm trwy gydol y flwyddyn
TWR 1: Atyniadau a Chyfleusterau Ymwelwyr	Byddir yn annog cynigion i ddatblygu atyniadau a chyfleusterau newydd i ymwelwyr neu i wella ac ymestyn y safon cyfleusterau presennol i safleoedd o fewn y ffin ddatblygu.
MAN 1: Datblygiadau Arfaethedig mewn Canol Trefi	Bydd cynigion am ddatblygiadau manwerthu, masnachol a hamdden newydd yn cael eu cyfeirio at ganol trefi yn y lle cyntaf, fel y dangosir ar y Mapiau Cynigion. Byddai angen i ddatblygiadau manwerthu a masnachol tu allan i'r canol trefi diffiniedig fod â thystiolaeth o'r angen am ddarpariaeth ychwanegol, a bodloni'r dull dilyniannol sydd wedi'i nodi mewn polisi cynllunio cenedlaethol a chydymffurfio â pholisiau eraill yn y Cynllun.
MAN 3: Manwerthu y Tu Allan i Ganol Trefi Diffiniedig ond y Tu Mewn i Ffiniau Datblygu	Diogelir siopau sydd wedi'u lleoli y tu allan i ganol trefi diffiniedig ond oddi mewn i'r ffin ddatblygu trwy wrthod cynigion am ddefnyddiau eraill oni bai y gellir dangos ei bod yn bosib cydymffurfio â'r meini prawf i gyd.
Polisi TAI 1: Tai yn y Ganolfan Isranbarthol a Chanolfannau Gwasanaeth Trefol	Yng Nghanolfan Isranbarthol Bangor a'r Canolfannau Gwasanaeth Trefol, bydd tai i gwrdd â strategaeth y Cynllun yn cael eu sicrhau drwy ddynodiadau tai ynghyd â safleoedd ar hap addas o fewn y ffin ddatblygu, yn seiliedig ar y ddarpariaeth ddangosol
TAI 8: Cymysgedd Priodol o Dai	Ceisio'r polisi hwn sicrhau bod pob datblygiad preswyl newydd yn cyfrannu at wella cydbwysedd tai ac yn diwallu anghenion penodol y gymuned gyfan.
TAI 15: Trothwy Tai Fforddiadwy a'u Dosbarthiad	Bydd disgwyl i ddatblygiadau tai, boed yn rhai newydd neu'n adeiladau wedi'u trosi, mewn aneddeleoedd sydd wedi'u hadnabod yn yr hierarchaeth aneddeleoedd, fel y gwelir ym Mholisi Strategol PS 17, wneud cyfraniad at dai fforddiadwy
TAI 16: Safleoedd Eithrio	Cefnogi cynigion ar gyfer 100% tai fforddiadwy ar safleoedd yn union wrth ymyl ffiniau datblygu sy'n ffurfio estyniad rhesymol i'r anheddiad. Gyda chynigion o'r fath, rhaid dangos bod angen lleol wedi'i brofi am dai fforddiadwy na ellir yn rhesymol eu darparu o fewn amserlen resymol ar safle marchnad y tu mewn i'r ffin ddatblygu lle mae'n ofynnol cael tai fforddiadwy.
PS 19: Gwarchod a Lle bo'n Berthnasol Wella'r Amgylchedd Naturiol	Yn unol â Pholisi Strategol PS19, dylid cymryd camau i sicrhau bod y cynnig yn gwarchod a, lle bo hynny'n briodol, yn gwella amgylchedd naturiol a chefn gwlad unigryw ardal y Cynllun.
AMG 3: Gwarchod a Gwella Nodweddion a Rhinweddau sydd yn Nodedig i Gymeriad y Dirwedd Leol	Dylid ystyried gwarchod a gwella nodweddion a rhinweddau sy'n unigryw i gymeriad y dirwedd leol. Mae manylion ar gyfer pob Ardal Cymeriad Tirwedd wedi'u cynnwys yn Niweddariad Strategaeth Tirwedd Ynys Môn 2011, gweler y ddolen isod.
AMG 4: Gwarchod yr Arfordir	Dylid cymryd camau i sicrhau nad yw'r cynnig yn achosi niwed annerbyniol i: • ansawdd dŵr; • ystyriaethau mynediad cyhoeddus; • yr amgylchedd adeiledig, neu gymeriad y dirwedd, neu'r morlun; • buddiannau bioamrywiaeth yr ardal
AMG 5: Cadwraeth Bioamrywiaeth Leol	Rhaid i gynigion warchod a, lle'n briodol, wella bioamrywiaeth sydd wedi'i hadnabod fel un sy'n bwysig i'r ardal leol trwy osgoi effaith niweidiol sylweddol ac ystyried cyfleoedd i greu a gwella a rheoli cynefinoedd bywyd gwyllt a thirwedd naturiol. Gwrthodir cynnig sy'n cael effaith ar safleoedd o bwysigrwydd bioamrywiaeth leol oni bai y gellir cydymffurfio â'r meini prawf, fel y'u rhestrir yn y polisi.
AMG 6: Gwarchod Safleoedd o Arwyddocâd Rhanbarthol neu Leol	Gwrthodir cynigion fyddai'n debygol o achosi niwed arwyddocaol uniongyrchol neu anuniongyrchol i Warchodfeydd

	Natur Lleol, Safleoedd Bywyd Gwyllt neu safleoedd daearegol/geomorffiaidd pwysig rhanbarthol oni bai fod modd profi fod yna angen cymdeithasol, amgylcheddol a/neu economaidd hollbwysig.
PS 20: Diogelu a Lle bo'n Berthnasol Wella Asedau Treftadaeth	Wrth geisio cefnogi anghenion economaidd a chymdeithasol ehangach ardal y Cynllun, bydd yr Awdurdodau Cynllunio Lleol yn diogelu a, lle bo hynny'n berthnasol, yn gwella'r asedau treftadaeth unigryw. Dylid hefyd ystyried adran 6.1 'Yr Amgylchedd Hanesyddol' Polisi Cynllunio Cymru mewn perthynas ag Adeiladau Rhestredig a Henebion Cofrestredig .
AT 1 Ardaloedd Cadwraeth, Safleoedd Treftadaeth y Byd a Thirweddau, Parciau a Gerddi Hanesyddol Cofrestredig	Dylai cynigion sy'n cael effaith ar osodiad a/neu olygfeydd arwyddocaol i mewn neu allan o'r cyfryw ddynodiadau ystyried y strategaethau/ cynlluniau rheoli perthnasol
AT 3 Asedau Treftadaeth nad ydynt wedi'u Dynodi sydd o Arwyddocâd Lleol neu Ranbarthol	Mae'n ofynnol i gynigion ddiogelu a chwilio am gyfleoedd i wella adeiladau, strwythurau ac ardaloedd, lle ceir asedau treftadaeth nad ydynt wedi'u dynodi sydd o arwyddocâd lleol neu ranbarthol

Isod mae dolenni i ddogfennau penodol y cyfeirir atynt uchod:

Datganiad Ysgrifenedig y Cynllun Datblygu Lleol ar y Cyd: <https://www.gwynedd.llyw.cymru/cy/Cyngor/Dogfennau-Cyngor/Strategaethau-a-pholisiau/Cynllunio-ac-amgylchedd/Polisi-cynllunio/Cynllun-Datblygu-Lleol-ar-y-Cyd-Gwynedd-a-M%C3%B4n-Datganiad-Ysgrifenedig.pdf>

Canllawiau Cynllunio Atodol Mabwysiedig y Cynllun Datblygu Lleol ar y Cyd: <https://www.ynysmon.gov.uk/cy/Trigolion/Cynllunio-rheoli-adeiladu-a-chadwraeth/Polisi-cynllunio/Canllawiau-Cynllunio-Atodol.aspx>

Strategaeth Tirwedd Ynys Môn 2011 - fersiwn gyfredol: <https://www.ynysmon.gov.uk/cy/Trigolion/Cynllunio-rheoli-adeiladu-a-chadwraeth/Polisi-cynllunio/Cynllun-Datblygu-Lleol-ar-y-Cyd-Ynys-M%C3%B4n-a-Gwynedd/Cynllun-Datblygu-Lleol-ar-y-Cyd-dogfennau-cefndirol.aspx>

Astudiaeth o Sensitifwydd a Chapasiti'r Dirwedd (2014): <https://www.gwynedd.llyw.cymru/cy/Cyngor/Strategaethau-a-pholisiau/Cynllunio-ac-amgylchedd/Polisi-cynllunio/Cynllun-Datblygu-Lleol-ar-y-Cyd/Dogfennau-Archwiliad-Cyhoeddus.aspx>
(gweler dogfen DC.020 yn y rhestr)

Deddf Llesiant Cenedlaethau'r Dyfodol 2015: <https://www.futuregenerations.wales/cy/>

Polisi Cynllunio Cenedlaethol – Polisi Cynllunio Cymru (Argraffiad 10) (Saesneg): <https://gov.wales/sites/default/files/publications/2018-12/planning-policy-wales-edition-10.pdf>

Nodiadau Cyngor Technegol (NauCT): <https://llyw.cymru/nodiadau-cyngor-technegol>

3.2 Tirwedd a Gweledol

- 3.2.1 Nid yw safle'r cais o fewn tirwedd ddynodedig. Fodd bynnag, mae ardal yr astudiaeth arfaethedig yn cynnwys rhan o'r Ardal o Harddwch Naturiol Eithriadol. Mae o fewn Ardal Cadwraeth Traeth Newry, lle ceir ardal o dirwedd wedi'i dylunio a gerddi ar dir adeiladau rhestredig. Mae Llwybr Arfordir Cymru yn mynd trwy'r safle ac ymlaen i'r AHNE gan gynnig golygfeydd panoramig o borthladd Caergybi.
- 3.2.2 O ran pwrpas yr adroddiad ac, yn benodol, yr Asesiad o'r Dirwedd, y Morlun a'r Effaith Weledol arfaethedig, mae'r materion a ganlyn yn berthnasol.
1. Ardal yr Astudiaeth
 2. Newidiadau deddfwriaethol
 3. Materion ychwanegol y mae angen eu cynnwys
 4. Materion cronus i'w cynnwys
 5. Methodoleg ar gyfer asesu arwyddocâd
1. Ardal yr astudiaeth (1.5): Cytunir y dylid gosod hwn ar radiws 2km. Fel y nodir yn 5.4.2, ac a ddangosir yn Nhabl 5.2 a Ffigur 5.1, cytunwyd ar leoliadau golygfannau ym mis Ionawr 2020.
 2. Newidiadau deddfwriaethol: o ran 2.5 Cynllun Rheoli'r AHNE <https://www.ynysmon.gov.uk/documents/Dogfennau-Cy/Cefn-Gwlad/Adolygiad-Cynllun-Rheoli-2015-2020-AHNE-Ynys-M%C3%B4n.pdf> ac mae diwygiadau dilynol yn berthnasol yn enwedig o ran yr asesiad o'r effaith amgylcheddol o'r effeithiau ar Rinweddau a Nodweddion Arbennig yr AHNE.

3. Materion ychwanegol y mae angen eu cynnwys. Dylai'r cynnig gynnwys arolwg coedyddiaeth ar gyfer Porth y Felin a Soldiers Point (lle mae coed yn cwrdd â'r meini prawf sylfaenol sydd i'w cynnwys) i BS 5837 (2012) - Coed mewn Perthynas â Dylunio, Dymchwel ac Adeiladu a dylid eu hymgorffori yn yr asesiad o'r effaith a gyfyd, yn enwedig y cyfnod adeiladu.
4. Nodir yn 5.4.4 y câi lluniau golygfannau a dynnwyd yn 2019 eu hailddefnyddio. Lle mae llystyfiant wedi dylanwadu ar asesiad o effeithiau, yr argymhelliad yw adolygu lluniau blaenorol i ystyried lle y gellid bod amrywiad tymhorol sylweddol, pe byddid yn mynd ati o'r newydd i dynnu lluniau yn ystod misoedd y gaeaf,
5. Materion cronus i'w cynnwys: Mae'r rhain wedi'u rhestru yn 6.2. Nid yw'r Cyngor yn cynnig unrhyw gynigion pellach ar sail y wybodaeth sydd ar gael mewn perthynas ag effeithiau tirwedd a gweledol.
6. Methodoleg ar gyfer asesu arwyddocâd: Disgrifir hyn yn 10.1.1 a'i dangos yn Nhabl 10.1. Derbynnir bod barn broffesiynol yn dylanwadu ar arwyddocâd yr effeithiau ac na chaiff yr arwyddocâd hwn, o reidrydd, ei ddiffinio gan y golofn / rhes y maent yn cael eu gosod ynddo. Fodd bynnag, mae angen mwy o fanylion am hyn o ran sensitifrwydd pob derbynnwyd Tirwedd, Morlun a Gweledol tebygol a'r ardaloedd yn y tabl, lle ystyrir bod effeithiau sylweddol yn debygol.
7. Dylai delweddau ac asesiadau gael eu croesgyfeirio'n briodol rhwng yr Asesiad o'r Dirwedd, y Morlun a'r Effaith Weledol a'r Asesiad o'r Effaith ar y Dreftadaeth ar gyfer golygfan yn yr Ardal Gadwraeth neu osodiad yr adeiladau rhestredig.

3.2.3 Lliniaru

- 3.2.3.1 Nodir rôl dylunio tirwedd (a dylunio) fel un liniarol, cadwraethol / diogelu a gwella yn 3.3.3 a 10.1.2 Dylai'r ffotogyfodiadau math 3 a gynigir yn 5.4.4 fod i lefel AVR 2 a 3 (sy'n briodol i bellter yr olygfan) er mwyn cynorthwyo'r broses hon.

3.3 Ecoleg

- 3.3.1 Gwneir y sylwadau isod gan Gyngorydd Ecolegol y Cyngor.
- 3.3.2 **Ymatebion ymgynghori 4.4. Adran 73 - gweler tudalen 33.** Noda'r Cyngor y caiff ei sylwadau i ymgynghoriad Adran 73 ar yr angen am liniaru eu cynnwys, a'i fod yn cydnabod y bydd 'y sylwadau hyn yn cael eu hystyried yn y Datganiad Amgylcheddol' (diwedd t33).
- 3.3.3 Sylwch ei bod yn amlwg bod gorgyffwrdd sylweddol rhwng gofynion yr Asesiad o'r Effaith Amgylcheddol a'r **angen i osgoi colledion bioamrywiaeth cyffredinol a chael gwelliant** o ystyried dyletswydd y Cyngor dan Ddeddf Amgylchedd Cymru (2016) i geisio cynnal a gwella bioamrywiaeth wrth gyflawni ei swyddogaethau, a chyfarwyddiadau gan y Prif Gynlluniwr i Benaethiaid Cynllunio (Hydref 2019) ar ddefnyddio'r ddyletswydd hon mewn achosion cynllunio. Bydd colledion yn digwydd mewn ardaloedd tua'r tir ond hefyd mewn ardaloedd rhynglanwol (ac islanwol). O ran Deddf 2016, bydd yn rhaid i'r lliniaru a'r gwella sy'n ofynnol gwmpasu mwy nag effeithiau tir yn unig. Fel y mae'r Cyngor wedi cydnabod yn gynt, mae'n annhebygol y bydd newid 'tebyg am ei debyg' am golli traeth, glan greigiog a chynefinoedd eraill yn ymarferol. O'r herwydd, bydd angen gwneud defnydd cadarnach o opsiynau eraill megis, o bosib, wella ystod o ardaloedd cynefinoedd ar yr arfordir, er enghraifft. Mae hyn yn her ddifrifol. Mae angen rhagor o drafodaethau gyda'r Cyngor a Chyfoeth Naturiol Cymru ar opsiynau lliniaru posibl.
- 3.3.4 **Mae copi o'r llythyr y cyfeirir ato uchod ynghlwm wrth y Farn Gwmpasu hon, er gwybodaeth. Dywed y Cyngor y bydd angen defnyddio'r un gofal ar gyfer Asesu'r Effaith Amgylcheddol er mwyn cwrdd â'r gofynion penodol hyn yng Nghymru.**
- 3.3.5 **5.5 Ecoleg a Chadwraeth Natur (t46):**
- 3.3.6 **5.5.1 Ecoleg y Tir:** Mae hyn yn ymddangos yn foddhaol yn y bôn. Er ei bod yn ymddangos bod yr arolygon a gynhaliwyd hyd yma yn cwmpasu'r gofynion, bydd yn rhaid darparu ar gyfer arolygon diweddar / gwiriadau cyn dechrau ar y gwaith ac ati, fel sy'n briodol, trwy amodau cynllunio er enghraifft.
- 3.3.7 **5.5.2 Ecoleg Rynglanwol a Benthig, 5.5.3 Adareg ac ardaloedd ecoleg eraill:** Ni fydd y Cyngor yn rhoi sylwadau manwl ar y rhain gan y byddant yn cael sylw arbenigol Cyfoeth Naturiol Cymru.
- 3.3.8 **7 Asesiad Rheoliadau Cynefinoedd (t85):** Mae'r sathru posibl ar gynefin Ardal Gadwraeth Arbennig a nodwyd yn Natganiad Amgylcheddol 2020 wedi cael sylw mewn Asesiad Priodol y cytunwyd arno gyda Chyfoeth Naturiol Cymru ym mis Hydref 2020. Mae'r Cyngor (a Chyfoeth Naturiol Cymru) yn

ymwybodol y bydd angen rhoi sylw dyledus i unrhyw newidiadau i gynigion, neu unrhyw resymau eraill a allai godi ac a allai sbarduno adolygiad a newidiadau posibl i'r Asesiad Priodol yn y dyfodol.

3.3.9 **9 Dull o Ddarparu Gwybodaeth Angenrheidiol** (t89): Nodwyd. Gweler y nodiadau ar 4.4 uchod.

3.3.10 **10 Dull Arfaethedig o Asesu'r Effaith Amgylcheddol** (t91): Nodwyd y dull.

3.4 Priffyrdd

3.4.1 Rhaid cwblhau'r lle parcio'n unol â'r manylion fel y'u cyflwynwyd cyn dechrau'r defnydd a ganiateir drwy hyn ac, yna, ei gadw at y dibenion hynny yn unig.

3.4.2 Ni fyddir yn dechrau ar y Datblygiad nes bod Cynllun Rheoli Traffig Adeiladu wedi'i gyflwyno i'r Awdurdod Cynllunio Lleol a'r Cynllun hwnnw wedi cael caniatâd ysgrifenedig yr Awdurdod. Bydd y Cynllun yn cynnwys;

- i. Y llwybr y bydd cerbydau adeiladu, peiriannau a nwyddau yn eu cymryd i'r safle ac oddi arno.
- ii. Maint a phwysau math y cerbydau adeiladu a danfon i'w defnyddio mewn cysylltiad ag adeiladu'r datblygiad, gan ystyried geometreg, lled, llinell a chyflwr strwythurol y rhwydwaith priffyrdd ar hyd y llwybr mynediad i'r safle;
- iii. Amseriad ac amllder cerbydau adeiladu a danfon i'w defnyddio mewn cysylltiad â'r datblygiad, gan ystyried lleihau'r effaith ar rannau sensitif o'r rhwydwaith priffyrdd a llwybrau adeiladu i'r safle, gan gynnwys ystyried derbynyddion sensitif e.e. cyfyngiadau rhwydwaith ac ysgolion;
- iv. Mesurau i leihau a lliniaru'r risg i ddefnyddwyr ffyrdd, yn enwedig defnyddwyr nad ydynt mewn car;
- v. Y trefniadau i'w gwneud i bersonél sy'n gweithio ar y safle ac i ymwelwyr barcio ar y safle;
- vi. Y trefniadau ar gyfer llwytho a dadlwytho a storio peiriannau a deunyddiau;
- vii. Manylion y mesurau sydd i'w gweithredu i atal mwd a malurion rhag halogi'r rhwydwaith priffyrdd cyfagos;

3.4.3 Bydd gwaith adeiladu'r datblygiad wedi'i gwblhau yn unol â'r Cynllun cymeradwy.

3.4.4 Rheswm: Sicrhau y caiff rheolaeth resymol a phriodol ei harfer dros draffig adeiladu a gweithgarwch adeiladu, er diogelwch ar y priffyrdd.

3.5 Gwarchod y Cyhoedd

3.5.1 Ar ôl iddo adolygu'r Adroddiad Cwmpasu hwn, mae'r adran Gwarchod y Cyhoedd yn derbyn y cynnwys a dull lliniaru materion sy'n ymwneud ag iechyd yr amgylchedd: megis sŵn a dirgryniad, ansawdd aer a'r systemau rheoli amgylcheddol cyffredinol i'w mabwysiadu am gyfnod y datblygiad.

3.5.2 Nid oes gan adran Gwarchod y Cyhoedd unrhyw sylwadau pellach i'w hychwanegu ar hyn o bryd.

3.6 Iechyd a Diogelwch

3.6.1 Rhaid i'r datblygiad gydymffurfio â gofynion Deddf Iechyd a Diogelwch yn y Gwaith ac ati 1974, a'r holl reoliadau a wneir dan y Ddeddf honno.

3.7 Llwybr yr Arfordir

3.7.1 Byddai'r Cyngor yn dweud bod Llwybr Arfordir Ynys Môn yn rhedeg trwy'r safle arfaethedig, a'i fod hefyd yn cael ei hyrwyddo fel rhan o Lwybr Arfordir Cymru.

3.7.2 Pe câi'r cais ei gymeradwyo, mae'n bwysig bod Llwybr yr Arfordir ar gael ac yn ddiogel yn ystod unrhyw waith. Byddai'r Cyngor, felly, yn gofyn am ragor o drafodaethau a manylion ynghylch sut y byddir yn diogelu mynediad i Lwybr yr Arfordir yn ystod y gwaith adeiladu a'i hyrwyddo wedi hynny ar ôl i'r gwaith gael ei gwblhau.

3.8 Treftadaeth Ddiwylliannol

3.8.1 Er bod yr Adroddiad Cwmpasu Amgylcheddol yn ddogfen eithaf swmpus, nid oes ynddo lawer o wybodaeth am y dreftadaeth adeiledig yng nghyffiniau'r cais (5.11). Mae'r rhan fwyaf o'r agweddau hanesyddol sydd wedi'u cynnwys yn y ddogfen mewn perthynas ag archeoleg, a rhywbeth i Wasanaeth Cynllunio Archeolegol Gwynedd ei asesu yw hynny. Fodd bynnag, mae'n nodi dan eitem 5.11.4, bod angen deall yr effeithiau a'r gwaith lliniaru posibl sy'n ofynnol ar gyfer unrhyw ased sydd heb ei ddynodi.

3.8.2 Nid yw'r Cyngor yn siŵr a yw'r gair 'sylfaenol', yn y canlynol dan 5.11.4 1b, yn briodol: *Casglu ac asesu'n sylfaenol yr effaith ar yr holl safleoedd archeolegol Dynodedig (Henebion Rhestredig,*

Adeiladau Rhestredig, Parciau a Gerddi Hanesyddol, tirweddau, Ardaloedd Cadwraeth) o fewn 1.5km i ymyl yr ardal Datblygu Arfaethedig;

- 3.8.3 Fodd bynnag, cyflwyno Asesiadau o Effaith Treftadaeth fydd yn cynnig cyfle i gyflwyno'r wybodaeth fanwl briodol sy'n angenrheidiol i werthuso effaith y cynigion ar yr asedau treftadaeth o'u cwmpas. O'r herwydd, byddai'r Cyngor yn disgwyl i Asesiad manwl o Effaith Treftadaeth gael ei gyflwyno i'r Cyngor fel rhan o unrhyw Ddatganiad Amgylcheddol i gefnogi cais cynllunio llawn.
- 3.8.4 Mae gan y CSYM bryder sylweddol o ran dadfeilio parhaus Soldiers Point a Ty Porth y Felin. Bydd yr CSYM yn ceisio cytuno, trwy Strategaeth Graddoli briodol, y bydd yr adeiladau hyn yn cael eu hailddatblygu mor gynnar â phosibl yn y rhaglen adeiladu.

3.9 Effeithiau Cronnus

- 3.9.1 Mae'r Cyngor yn nodi cynnig yr ymgeisydd i gynnal Asesiad o Effaith Gronnus. Mae'r Cyngor yn derbyn y datblygiadau arfaethedig fydd yn cael eu cynnwys o fewn cwmpas yr Asesiad o Effaith Gronnus (6.2). Mae'r Adroddiad Cwmpasu'n datgan y bydd y prosiectau hyn ac unrhyw rai eraill a nodwyd yn ystod proses Asesu'r Effaith Amgylcheddol yn cael eu monitro fel bod modd diweddarau'r Asesiad o Effaith Gronnus yn unol â hynny. Mae'r Cyngor yn cefnogi'r dull hwn, gan fod angen asesu'r effeithiau cronnus pan wneir penderfyniad ac nid adeg y cyflwyno'n unig. Bydd y Cyngor, felly, yn rhoi gwybod i'r ymgeisydd am unrhyw ddatblygiad arall y credwn y mae angen, o bosib, ei gynnwys fel rhan o unrhyw asesiad cronnus (yn ôl yr angen).
- 3.9.2 O ystyried nifer y datblygiadau mawr a fwriedir ym mhorthladd Caergybi (sef Gwaith Adnewyddu'r Morglawdd, Ailadeiladu'r Marina, Ehangu'r Porthladd a Morlais) mae'r Cyngor o'r farn y dylid rhoi sylw arbennig i'r cynigion datblygu hyn pan fyddir yn asesu'r effeithiau cronnus (yn enwedig yn ystod y gwaith adeiladu). Mae posibilrwydd pendant y gellid adeiladu'r holl brosiectau hyn yr un pryd ac, felly, efallai y bydd angen nodi mesurau lliniaru priodol.

3.10 Economaidd Gymdeithasol

- 3.10.1 Mae'r Cyngor, at ei gilydd, yn derbyn y dull a'r fethodoleg ar gyfer asesu effeithiau economaidd gymdeithasol. Fodd bynnag, byddai'r Cyngor wedi disgwyl i dwristiaeth gael ei chynnwys yn y bennod hon o ystyried ei phwysigrwydd i'r economi leol a rhanbarthol. Mae angen manylion hefyd am gyfleoedd cadwyni cyflenwi (adeiladu a gweithredu) yn ogystal â threthi busnes. Mae'r datblygiad hwn yn cynnig cyfleoedd economaidd gymdeithasol sylweddol i bobl a busnesau lleol ac mae angen adlewyrchu hyn yn y Datganiad Amgylcheddol.
- 3.10.2 Mae'r Cyngor yn pryderu y gwnaed i fwrdd â nifer o'r datblygiadau a gynigiwyd yng nghais 2010 neu eu bod wedi'u lleihau (e.e. masnachol a hamdden, gwesty, amgueddfa ac ati). Roedd y buddion economaidd gymdeithasol hyn yn ystyriaethau perthnasol, y rhoddwyd pwys iddynt yn y broses benderfynu wreiddiol. Mae dileu'r elfennau hyn o'r datblygiad yn newid natur y datblygiad yn sylfaenol. Mae'r Cyngor yn awyddus i ddeall pa fuddion economaidd gymdeithasol / buddion cymunedol eraill sy'n debygol o ddod o'r datblygiad hwn i gydbwysu yn erbyn yr effeithiau niweidiol posibl ar ecoleg, y dirwedd, y farchnad dai leol ac ati. Heb y buddion economaidd gymdeithasol hyn, cynllun preswyl mawr yw'r cais yn ei hanfod ac nid y prosiect adfywio trawsnewidiol fel y'i disgrifiwyd.
- 3.10.3 Mae'r Cyngor yn awyddus i weithio gyda'r ymgeisydd i nodi'r buddion a'r cyfleoedd economaidd gymdeithasol a gyfyd o'r datblygiad arfaethedig er mwyn sicrhau y caiff cyfleoedd adfywio'r cynnig eu gwreiddu. Yna, bydd angen sicrhau'r mesurau lliniaru hyn trwy amod neu gytundeb a.106, yn ôl yr angen. O ystyried lleoliad y datblygiad arfaethedig y tu allan i'r ffin datblygu, ni all y Cyngor bwysleisio digon bwysigrwydd buddion a chyfleoedd economaidd gymdeithasol yn y broses benderfynu.

4.0 Cyrff Statudol yr Ymgynghorwyd â Nhwy

4.1 Gwasanaeth Cynllunio Archeolegol Gwynedd

- 4.1.1 O edrych am y tro cyntaf ar yr adroddiad cwmpasu, mae'n ymddangos bod cwmpas yr asesiad archeolegol yn briodol. Byddai Gwasanaeth Cynllunio Archeolegol Gwynedd yn awgrymu ei bod yn fwyaf tebygol y bu newid ers yr adroddiad blaenorol ar y safle yn hytrach nag yn y ffynonellau archif ac, felly, dylid cynnwys ymweliad safle fel rhan o waith diweddarau'r gwaelodlin.

4.2 Cyfoeth Naturiol Cymru

- 4.2.1 Sylwch nad yw sylwadau Cyfoeth Naturiol Cymru'n rhagfarnu yn erbyn unrhyw sylwadau y byddem efallai am eu gwneud wrth ymgynghori â nhw ar unrhyw geisiadau cynllunio dilynol neu wrth gyflwyno adroddiad cwmpasu manylach neu'r Datganiad Amgylcheddol llawn. Adeg cyflwyno unrhyw gais

cynllunio efallai y bydd gwybodaeth newydd ar gael y bydd angen i ni ei hystyried wrth ymateb yn ffurfiol.

- 4.2.2 Mae'r sylwadau hyn yn cynnwys y materion hynny y cred Cyfoeth Naturiol Cymru y bydd angen eu hystyried a'u cymhwyso i'r Asesiad o'r Effaith Amgylcheddol a'r Datganiad Amgylcheddol sy'n deillio o hynny.

4.2.3 Sylwadau Cyffredinol

- 4.2.3.1 Rhoddodd Cyfoeth Naturiol Cymru sylwadau manwl i gais Adran 73 (VAR / 2020/20 / EIA) yn ei gyngor dyddiedig 13/5/2020. Cefnogwyd y cais hwn gan Asesiad o'r Effaith Amgylcheddol (y cyfeirir ato fel 'Datganiad Amgylcheddol 2020' yn Adroddiad Cwmpasu'r Asesiad o'r Effaith Amgylcheddol) a roes wybodaeth sylfaenol gyfredol ac asesiad o'r cynllun a gymeradwywyd yn 2014. Nodwn fod y cynllun bellach wedi'i ddiwygio a bod y newidiadau arfaethedig wedi'u crynhoi yn adran 1.2.2 Adroddiad Cwmpasu'r Asesiad o'r Effaith Amgylcheddol. Bydd angen diweddaru'r Datganiad Amgylcheddol fydd yn cefnogi cais newydd i asesu'n llawn unrhyw effeithiau sylweddol tebygol a gyfyd o'r newidiadau arfaethedig. Bydd ein cyngor isod yn canolbwyntio'n bennaf ar yr effeithiau hynny sy'n deillio o'r newidiadau i'r cynllun a ddisgrifir yn adran 1.2.2, ond byddem yn cyfeirio'r ymgeisydd at y cyngor yn ein llythyr dyddiedig 13/5/2020 a roddodd nifer o sylwadau y dylid rhoi sylw iddynt, ochr yn ochr â'r sylwadau isod.

- 4.2.3.2 Wrth ddatblygu methodoleg yr Asesiad o'r Effaith Amgylcheddol (fel y'i disgrifir yn adran 10.1.1 adroddiad Cwmpasu'r Asesiad o'r Effaith Amgylcheddol), cynghorir cyflwyno meini prawf ysgrifenedig ar gyfer pob un o'r lefelau maint a sensitifrwydd i roi trywydd archwilio ar aseinio derbynyddion i feini prawf maint a sensitifrwydd.

4.2.4 Risg Llifogydd

- 4.2.4.1 Mae adroddiad Cwmpasu'r Asesiad o'r Effaith Amgylcheddol yn nodi bod y cynllun yn cynnig datblygiad a allai fynd dan ddŵr. Cadarnha ein Map Perygl Llifogydd bod y safle o fewn ardal C2 o'r Map Cyngor Datblygu sydd yn NCT15.

- 4.2.4.2 Fe'ch cyfeiriwn at Adran 6 NCT15 ac at lythyr y Prif Swyddog Cynllunio oddi wrth Lywodraeth Cymru, dyddiedig 9 Ionawr 2014, sy'n cadarnhau na ddylid caniatáu gwasanaethau argyfwng a datblygiadau a allai fynd dan ddŵr yn Ardal C2 (paragraff 6.2 NCT15). Nid yw'r profion cyfiawnhad ym mharagraff 6.2 NCT15 yn berthnasol i wasanaethau argyfwng na datblygiadau a allai fynd dan ddŵr yn ardal C2.

- 4.2.4.3 Yn y lle cyntaf, dylai eich Awdurdod wneud penderfyniad polisi cynllunio ar y cais. Felly, oni bai ein bod yn cael cadarnhad ysgrifenedig gan eich Awdurdod y credwch fod rhesymau hynod bwysig dros ystyried symud y cais cynllunio ymlaen, er gwaethaf lleoliad y safle o fewn Ardal C2, nid ydym yn bwriadu rhoi cyngor ar yr Asesiad o'r Effaith Amgylcheddol / Asesiad o Ganlyniadau'r Llifogydd.

- 4.2.4.4 Mater i'ch Awdurdod chi'n llwyr yw penderfynu a ddylid ystyried datblygiad yn groes i bolisi TAN15. Fodd bynnag, os rhoddwch resymau hynod bwysig a gofyn am ein cyngor cwmpasu Asesiad o'r Effaith Amgylcheddol ar risg llifogydd, rhoddwn y cyngor a ganlyn:

- 4.2.4.5 Nodwn y bydd y cynnig yn cynnwys Asesiad cyfredol o Ganlyniadau'r Llifogydd ac y cynigir morglawdd marina newydd fel y bydd effeithiau tonnau posibl yn cael eu lleihau. Nodir cynnwys y parapet (amddiffynfa newydd rhag llifogydd) a lefelau gofynnol y llawr gorffenedig. Byddai angen i'r Asesiad cyfredol o Ganlyniadau'r Llifogydd hefyd ystyried y buddion y mae'r Morglawdd Mawr yn eu cael ar y tonnau ac ar unrhyw risgiau gweddilliol pe bai'r morglawdd yn methu yn ystod oes 100 mlynedd ei ddatblygiad (gan ystyried na ddylid rhagdybio unrhyw waith cynnal a chadw ar y strwythur). Rydym yn cynghori bod angen ehangu hyn a chynnwys dadansoddiad manwl yn yr Asesiad cyfredol o Ganlyniadau'r Llifogydd

- 4.2.4.6 Yn olaf, fel y gŵyr eich Awdurdod, dan Gyfarwyddyd Cynllunio Gwlad a Thref (Hysbysiad) (Cymru) 2012 ac, yn fwy penodol, Gategori I sy'n ymwneud â Datblygu Ardal Perygl Llifogydd, lle mae'r Awdurdod Cynllunio o blaid rhoi caniatâd, mae'n ofynnol cyfeirio ceisiadau am wasanaethau brys neu ddatblygiad a allai fynd dan ddŵr yn Ardal C2, at Lywodraeth Cymru.

4.2.5 Tirwedd a Warchodir

- 4.2.5.1 Mae'r cynnig yn rhannol yn Ardal Harddwch Naturiol Eithriadol Ynys Môn.

- 4.2.5.2 Bydd angen i'r Asesiad o'r Effaith Amgylcheddol asesu effeithiau'r cynnig yn llawn (fel y'i diwygiwyd) ar olygfeydd o'r AHNE. Derbynnir y golygfannau a nodir yn Ffigur 5.1. Mae angen i Ffigur 5.1 lleoliadau golygfannau, ddangos yr AHNE ac unrhyw rannau o'r Arfordir Treftadaeth a allai hefyd fod yn yr ardal hon, er mwyn dangos y dirwedd a'r cyd-destun gweledol yn well.

4.2.5.3 Er mwyn osgoi effeithiau gweledol diangen ar y golygfeydd o'r AHNE, mae integreiddio'r datblygiad ac osgoi ei amlygrwydd gweledol yn strategaeth ddatblygu bwysig ar gyfer y safle hwn,

4.2.5.4 Mae angen rhoi sylw penodol i liw toeau, drychiadau a rheoli goleuadau yn nyluniad y cynllun. Gallai plannu coed yn strategol ar hyd Ffordd y Traeth / the Greens helpu i liniaru'r ardaloedd defnydd tir gwahanol, sydd yma yn cynnwys datblygiadau wrth ymyl y môr, coridor man gwyrdd agored heb unrhyw nodwedd a datblygiadau preswyl.

4.2.5.5 Efallai y bydd yr ymgeisydd hefyd yn dymuno ystyried y cyngor a roesom yn ein llythyr dyddiedig 13/5/2020 ar gais A73.

4.2.6 Safleoedd Gwarchodedig

4.2.6.1 Mae gan y cynigion y potensial i effeithio ar nifer o safleoedd gwarchodedig yn y cyffiniau gan gynnwys:

- Safle o Ddiddordeb Gwyddonol Arbennig Arfordir Ynys Gybi
- Ardal Cadwraeth Arbennig Arfordir Ynys Gybi
- Ardal Gwarchod Arbennig Arfordir Ynys Gybi
- Ardal Cadwraeth Forol Arbennig Gogledd Môn
- Ardal Gwarchod Arbennig Môr-wenoliaid Môn
- Ardal Gwarchod Arbennig Bae Lerpwl
- Safle o Ddiddordeb Gwyddonol Arbennig Ynysoedd y Moelrhoniaid

4.2.6.2 Bydd angen i'r Datganiad Amgylcheddol nodi llwybrau effaith ar gyfer safleoedd gwarchodedig, asesu lefelau'r effaith posibl yn glir a, lle mae effeithiau'n debygol, dylai nodi manylion llawn y mesurau lliniaru priodol i roi sylw i'r effeithiau hynny.

4.2.6.3 O ran adran 7.4, fe'n cynghorir i fod yn rhan o'r adroddiad sgrinio cyfredol ar yr Asesiad Cysgodol o'r Rheolau Cynefinoedd cyn i'r asesiad priodol gael ei gynnal, er mwyn sicrhau y caiff yr holl nodweddion angenrheidiol eu hasesu.

4.2.7 Rhywogaethau Goresgynnol

4.2.7.1 Fel y manylir yn ein cyngor ar gais A73 ar 13/5/2020, mae gennym bryderon y gallai'r cynnig gynorthwyo i ledaenu *Didemnum vexillum* (Chwistrell fôr garped). Cyflwynwyd ychydig o wybodaeth yn Natganiad Amgylcheddol 2020 i gyfiawnhau'r asesiad o 'Dibwys / Ddim yn arwyddocaol' mewn perthynas â lleihau lledaeniad yn ystod gweithgarwch adeiladu / gweithredu. Credwn ei bod yn bosibl y gallai'r datblygiad arfaethedig ledaenu rhywogaethau estron goresgynnol, gan nad oes mesurau bioddiogelwch da ar gyfer gweithgarwch adeiladu a gweithredol a, thrwy hynny, o bosibl gael effaith ar nodweddion Ardal Cadwraeth Forol Arbennig o amgylch Cymru e.e. Ardal Cadwraeth Arbennig y Fenai a Bae Conwy.

4.2.7.2 Croesawn y datganiad yn adran 5.5.2.4 adroddiad Cwmpasu'r Asesiad o Effaith Amgylcheddol y "*cyflwynir asesiad risg bioddiogelwch fydd yn cynnwys mesurau i reoli, dileu neu gael rheolaeth tymor hir o'r rhywogaethau estron goresgynnol yn ystod y gwaith adeiladu a gweithredu ar gyfer amgylcheddau morol*". Byddem yn disgwyl i'r wybodaeth hon gael ei chynnwys yn y Datganiad Amgylcheddol neu fel atodiad iddo.

4.2.8 Pwysau Hamdden

4.2.8.1 Mae'n bosib y gallai'r cynnig gynyddu pwysau hamdden ar Safle o Ddiddordeb Gwyddonol Arbennig ac Ardal Cadwraeth Arbennig Arfordir Ynys Gybi a, thrwy hynny, gael effaith ar nodweddion arbennig y safleoedd. Yn ein hadolygiad o Ddatganiad Amgylcheddol 2020, yn ein hymateb ar 13/5/2020, bu i ni ddweud "*cynigir mesurau lliniaru ond nid oes manylion am faint y mesurau hyn. Rydym yn cytuno mewn egwyddor y bydd y mesurau hyn yn ddigonol i liniaru effeithiau posibl ond nodwn y bydd ychydig o waith i gytuno ar lefelau cyllid priodol a manylion cysylltiedig*". Bu i ni gynghori gosod amodau (neu rwymedigaeth adran 106) i sicrhau y ceid gwaith lliniaru manwl a'r cyllid cysylltiedig.

4.2.8.2 Rydym yn cytuno bod y newidiadau i'r datblygiad arfaethedig, fel y'u disgrifir yn adran 1.2.2, yn annhebygol o arwain at effeithiau sylweddol ychwanegol, uwchlaw a thu hwnt i'r hyn a aseswyd yn Natganiad Amgylcheddol 2020. Fodd bynnag, byddem yn argymhell bod yr ymgeisydd yn ystyried cyflwyno mesurau lliniaru manwl yn y Datganiad Amgylcheddol cyfredol.

4.2.9 Mamaliaid y Môr

4.2.9.1 Yn ein hymateb dyddiedig 13/5/2020, yn dilyn yr adolygiad o Ddatganiad Amgylcheddol 2020, dywedasom ei bod yn annhebygol y ceid effaith sylweddol ar Ardal Cadwraeth Forol Arbennig gogledd Môn (nac ar famaliaid morol a restrir dan Atodiad II neu Atodiad IV y Gyfarwydddeb Cynefinoedd). Roedd hyn yn seiliedig ar y ddealltwriaeth nad oedd angen drilio na pheilio (na chynnal unrhyw weithgaredd sy'n debygol o gynhyrchu sŵn sylweddol). Rydym yn cynghori y dylai'r Datganiad Amgylcheddol diwygiedig gadarnhau bod hyn yn wir yn dilyn y newidiadau i'r cynigion, fel y'u disgrifir yn adran 1.2.2.

4.2.9.2 Nodwn mai'r cynnig diwygiedig yw lleihau nifer yr angorfeydd morol o 500 i 250 ac y bydd llai o gychod yn ystod y cyfnod gweithredol. Rydym yn cytuno y byddai'r newidiadau arfaethedig i'r gwaith yn gyfystyr â newid yn yr effeithiau posibl ar famaliaid morol trwy'r llwybrau a amlinellir yn Adran 5.5.5.3 ac Adran 7.3.2 (h.y. y gallai'r carthu posibl arfaethedig yn y cynllun diwygiedig beri mwy o sŵn dan y dŵr, a chychod yn ystod y gwaith carthu. Gallai hyn gael effaith ar faint o ysglyfaeth fyddai ar gael (neu fygu cynefin yr ysglyfaeth) wrth garthu a gwaredu). Rydym yn cytuno â'r dull arfaethedig i gyflwyno'r wybodaeth ofynnol a amlinellir yn Adran 5.5.5.4 ac y dylid diweddarau Adran 7.4 i adlewyrchu'r datblygiad arfaethedig diwygiedig. Rydym hefyd yn fodlon â'r disgrifiad o sut y bydd effeithiau trwy sŵn yn cael eu hailasesu yn Adran 5.9.4, yn yr ystyr y bydd asesiadau sŵn yn cael eu hailgyfrifo i adlewyrchu'r disgrifiad newydd o'r gwaith. Penderfynir ar addasrwydd yr ailasesiad a ddisgrifir a'r Asesiad Cysgodol cyfredol o'r Rheoliadau Cynefinoedd, iddynt adlewyrchu'r gwaith newydd yn gywir, ar ôl derbyn y dogfennau hynny.

4.2.10 Ornotholeg

4.2.10.1 Yn ein hymateb dyddiedig 13/5/2020 yn seiliedig ar Ddatganiad Amgylcheddol 2020, dywedasom ein bod yn cytuno â'r casgliadau na fyddai'r cynnig yn cael effaith andwyol ar Ardal Gwarchod Arbennig Arfordir Ynys Gybi (y mae'r frân goesgoch i'w gweld yno). Yn wyneb y cynllun diwygiedig a ddisgrifir yn 1.2.2, rydym o'r farn nad yw'r newidiadau penodol yn debygol o beri effaith andwyol ar yr Ardal Gwarchod Arbennig.

4.2.10.2 Mewn perthynas ag Ardal Gwarchod Arbennig Môr-wenoliaid Môn ac Ardal Gwarchod Arbennig Bae Lerpwl, wrth adolygu Datganiad Amgylcheddol 2020, dywedasom na fyddai'r cynnig yn cael effaith andwyol ar yr Ardaloedd Gwarchod Arbennig hyn. Fodd bynnag, fel y manylir yn adran 5.5.3.3 o'r Adroddiad Cwmpasu, mae'n bosibl y gallai'r cynigion diwygiedig, sydd bellach yn cynnwys carthu, gael effaith ar chwilota am adar arfordirol a morol oherwydd effeithiau dros dro ar adar ysglyfaethus yn ystod gweithgarwch carthu a gwaredu. Bydd angen asesu effeithiau uniongyrchol ac anuniongyrchol carthu ar yr Ardaloedd Gwarchod Arbennig hyn yn llawn yn y Datganiad Amgylcheddol, a nodi unrhyw fesurau lliniaru angenrheidiol. Dylai'r wybodaeth hon hefyd lywio Asesiad Cysgodol yr ymgeisydd o'r Rheoliadau Cynefinoedd.

4.2.11 Prosesau Arfordirol

4.2.11.1 Yn ôl Adran 1.5 yr adroddiad, mae ardal yr astudiaeth yn 2km, gan ei bod yn seiliedig ar effeithiau posibl newidiadau mewn hydrodynameg a chludo gwaddod (sy'n cynnwys newidiadau ym mwriad diwygiedig y prosiect). Nodir hefyd y caiff y 2km ei lywio gan y modelu a waned, fel y'i disgrifir yn adran 5.1.4. Ar hyn o bryd mae'r radiws 2km yn croestorri'r traeth ym Mhenrhos, oherwydd natur traethau bychain yr arfordir o amgylch gogledd Môn. Yr argymhelliad yw ymestyn ardal yr astudiaeth i'r dwyrain i'r pentir ym Mhenrhos o leiaf ac, o bosibl, ymhellach os dengys y gwaith modelu bod angen hyn.

4.2.11.2 Nodir y bydd yr hyn a gaiff ei garthu yn cael ei ystyried ar gyfer ei ddyddodi ar dir gwaredu gogledd Caergybi. Ar hyn o bryd, gwyddys bod gogledd Caergybi'n effeithiol wrth wasgaru gronynnau mân sydd heb galedu, ond os oes angen cael gwared â gwaddod o gyfansoddiad gwahanol, bydd angen asesiad amgylcheddol penodol ar gyfer hyn. Bydd angen ystyried gallu'r safle hefyd mewn perthynas â phrosiectau a phwysau eraill yn yr ardal, fel y nodwyd yn adran 6.2 yr asesiad cronrus.

4.2.11.3 Noda adran 5.2.2.3 y rhoddwyd sylw i golli cynefinoedd dan ôl troed y morglawdd yn Natganiad Amgylcheddol 2020 ac nid yw'n cyfeirio at unrhyw newidiadau yn ôl troed y morglawdd. Nid yw'n eglur a oes unrhyw newidiadau i strwythur dylunio'r morglawdd. Bydd gofyn i'r Datganiad Amgylcheddol asesu'n llawn unrhyw effeithiau a / neu newidiadau ar hydrodynameg a symudiad gwaddod o ganlyniad i unrhyw newid i ddyluniad morglawdd ac unrhyw effeithiau dilynol ar ddiddordeb ecolegol o ran yr amserlenni adeiladu, gweithredu a datgomisiynu.

4.2.12 Ansawdd Dŵr y Môr / Y Gyfarwydddeb Fframwaith Dŵr

4.2.12.1 Amlyga adran 5.8.3.1 yr adroddiad Cwmpasu y materion allweddol a nodwyd yn Natganiad Amgylcheddol 2020. Sylwch, yn ein hymateb dyddiedig 13/5/2020 (Atodiad 1 y llythyr), y bu i ni gyflwyno nifer o sylwadau yn ymwneud ag ansawdd dŵr y môr a'r Gyfarwydddeb Fframwaith Dŵr.

Cynghorwn fod yr ymgeisydd yn ystyried y sylwadau a godwyd yn Atodiad 1 o'r ymateb hwnnw'n llawn ac yn rhoi sylw iddynt fel rhan o unrhyw Ddatganiad Amgylcheddol cyfredol.

- 4.2.12.2 Mewn perthynas â gwybodaeth sylfaenol newydd, mae adran 5.8.2.2 yr adroddiad Cwmpasu'n nodi y caiff *"canfyddiadau'r dadansoddiad cemegol o'r samplau gwaddod a gasglwyd o fewn ôl troed y Datblygiad Arfaethedig eu cyflwyno yn Atodiad E a'u cymharu â Lefelau Gweithredu Cefas. Er cofnodi nifer o samplau a aeth dros Lefel Gweithredu 1, ymylol oedd y rhain i gyd ac ystyrir ei fod yn addas gwaredu'r deunydd yn y môr ar safle gwaredu ISO43 gogledd Caergybi"*. Nodwn y bydd Cyfoeth Naturiol Cymru'n gwneud cais am Drwydded Forol i gael gwaredu yng ngogledd Caergybi. Nodwn hefyd y bydd yr ymgeisydd yn gofyn am gyngor Cwmpasu Asesiad o'r Effaith Amgylcheddol gan Wasanaeth Trwyddedu Cyfoeth Naturiol Cymru mewn perthynas â'r Drwydded Forol.
- 4.2.12.3 Tynna adran 5.8.3.2 sylw at y newidiadau (yn ymwneud â'r gwaith carthu a fwriedir bellach) ers cynhyrchu Datganiad Amgylcheddol 2020 a chyfeirio at y mater allweddol a ganlyn sydd bellach yn berthnasol: *"Halogi dŵr morol ac ansawdd gwaddod trwy weithgareddau carthu a gwaredu yn ystod y gwaith adeiladu."* Cynghorwn y bydd angen asesu'n llawn effeithiau carthu a'r hyn a gerthir ar ansawdd dŵr môr yn y Datganiad Amgylcheddol, a nodi unrhyw fesurau lliniaru angenrheidiol. Dylai'r wybodaeth hon hefyd lywio Asesiad Cysgodol diwygiedig yr ymgeisydd o'r Rheoliadau Cynefinoedd ac asesiad diwygiedig o gydymffurfiaeth y Gyfarwydddeb Fframwaith Dŵr.
- 4.2.12.4 Tynna adran 4.3 o'r adroddiad sylw at y ffaith yr ymgynghorwyd â Thîm Trwyddedu Morol Cyfoeth Naturiol Cymru o'r blaen mewn perthynas â'r Cynllun Sampl Gwaddodion. Fel y nodwyd yn adran 1.1 yr Adroddiad Cwmpasu, dylid gofyn am farn gwmpasu Tîm Trwyddedu Morol Cyfoeth Naturiol Cymru mewn perthynas â'r gwaith y gwneir cais am Drwydded Forol ar ei gyfer.
- 4.2.12.5 Nid yw'n eglur a fydd y newidiadau a fwriedir i'r morglawdd yn cynnwys newidiadau i'w ddyluniad. Dywed Cyfoeth Naturiol Cymru y bydd angen asesu unrhyw newidiadau i ddyluniad y morglawdd yn ddigonol a bydd angen ystyried ôl troed y morglawdd fel achos o golli cynefin yn barhaol.
- 4.2.12.6 Os oes angen arolygon pellach i ymchwilio i ôl troed y morglawdd (os yw hwn yn wahanol i'w ddyluniad cyfredol a bod angen arolygon pellach) yna bydd angen dadansoddiad o'r deunydd ar gyfer dadansoddi halogyddion a maint gronynnau cyn y gellir pennu ei fod yn addas i gadw'r hyn a garhwyd yn yr amgylchedd morol (h.y. eu gwaredu ar dir gwaredu trwyddedig gogledd Caergybi).
- 4.2.12.7 Rydym yn croesawu'r datganiad a gyflwynwyd gan yr Ymgeisydd yn Adran 5.8.4, y caiff canlyniadau'r samplu gwaddod eu defnyddio i asesu effeithiau ar ansawdd dŵr a gwaddod. Rydym hefyd o'r farn y bydd angen ystyried y wybodaeth hon yng nghyd-destun effeithiau posibl ar fywyd y môr.

4.2.13 Ecoleg Benthig

- 4.2.13.1 Noda Adran 5.2.2.3 y rhoddwyd sylw i golli cynefinoedd dan ôl troed y morglawdd yn 'Natganiad Amgylcheddol 2020' ac nid yw'n cyfeirio at unrhyw newidiadau yn ôl troed y morglawdd. Nid yw'n eglur a oes unrhyw newidiadau i strwythur dylunio'r morglawdd. Cyfeiriwn yr ymgeisydd at ein cyngor ar Brosesau Arfordirol a roddir uchod lle: *"Bydd gofyn i'r Datganiad Amgylcheddol asesu'n llawn unrhyw effeithiau a / neu newidiadau ar hydrodynameg a symudiad gwaddod o ganlyniad i unrhyw newid yn nyluniad y morglawdd ac unrhyw effeithiau dilynol ar ddiddordeb ecolegol o ran yr amserlenni adeiladu, gweithredu a datgomiynu."*
- 4.2.13.2 Rydym yn cytuno â'r materion allweddol ychwanegol isod a nodwyd yn Adran 5.5.2.3 sydd i'w hasesu yn Natganiad Amgylcheddol 2020 yn dilyn y newidiadau i'r cais:
- *"Cynnydd mewn crynodiad gwaddod crog a mygu cynefinoedd a rhywogaethau benthig yn ystod gweithgarwch carthu a gwaredu; ac,*
 - *Ailgrog i dyddodi gwaddod a allai fod wedi'i halogi yn ystod gweithgarwch carthu.*
 - *Y dylid ystyried y cynefinoedd creigiau ar lan y môr a than y môr o fewn ôl troed y Datblygiad Arfaethedig yn gynefin rîff greigiog Atodiad I.*
 - *mai ychydig o gyfiawnhad oedd dros asesu lleihau lledaeniad rhywogaethau estron goresgynnol yn ystod gweithgarwch adeiladu / gweithredu fel 'dibwys / ddim yn arwyddocaol'".*
- 4.2.13.3 Cynghorwn y bydd angen asesu'r materion allweddol hyn yn llawn yn y Datganiad Amgylcheddol a nodi unrhyw fesurau lliniaru angenrheidiol. Dylai'r wybodaeth hon hefyd lywio Asesiad Cysgodol diwygiedig yr ymgeisydd o'r Rheoliadau Cynefinoedd (fel cynefin ategol) ac asesiad diwygiedig o gydymffurfiaeth y Gyfarwydddeb Fframwaith Dŵr.
- 4.2.13.4 Rydym yn croesawu'r ffaith y bydd yr ymgeisydd yn ystyried y sylwadau a godwyd yn Atodiad 1 o'r ymateb dyddiedig 13/5/2020 (yn enwedig mewn perthynas â chynefin rîff greigiog Atodiad 1) fel rhan o unrhyw Ddatganiad Amgylcheddol cyfredol. Cyfeiriwn, hefyd, at ein sylwadau uchod

(Safleoedd Gwarchodedig) mewn perthynas â rhywogaethau estron goresgynnol morol a allai gael effaith ar ecoleg benthig.

4.2.13.5 Yn Adran 5.5.2.4 dywed yr ymgeisydd “*Cynhelir arolygon o fideo o wely'r môr i ddilysu'r arolygon blaenorol a gynhaliwyd yn 2009. Ymhellach, cynhelir trawsluniau islanwol ychwanegol i bennu maint a chyflwr cynefin rîff Atodiad 1 o fewn ôl troed y Datblygiad Arfaethedig.*” Rydym yn croesawu'r dull hwn a byddem yn hapus trafod gyda'r ymgeisydd i ddatblygu dyluniad arolwg sy'n addas at y diben. Rydym hefyd yn cynghori'r ymgeisydd y dylid cyfrif ardaloedd o rîff creigiog ar lan y môr a than y môr y mae ôl troed uniongyrchol y datblygiad yn debygol o gael effaith arnynt, dan fesurau lliniaru priodol a gyflwynir er mwyn helpu i liniaru colli'r cynefin hwn. Gall mesurau o'r fath fod ar ffurf mesurau gwella bioamrywiaeth sy'n gysylltiedig ag adeiladu'r marina artiffisial ac ardal datblygu glannau adfer tir. Mae croeso i unrhyw un drafod ymhellach â Chyfoeth Naturiol Cymru er mwyn helpu i arwain y broses hon.

4.2.14 Pysgod a Physgod Cregyn

4.2.14.1 Rydym yn croesawu cynnwys ystyried pysgod a physgod cregyn yn yr Asesiad o'r Effaith Amgylcheddol fel y nodwyd yn Adran 5.5.4. Fodd bynnag, nid ydym yn cytuno y gellir edrych ar effeithiau gwaredu deunydd a garthwyd ar bysgod a physgod cregyn nes ein bod wedi cael cyfle i adolygu canlyniadau'r profion gwaddod a gynhaliwyd, ac y penderfynwyd bod y deunydd yn addas ar gyfer ei waredu ar dir gwaredu gogledd Caergybi (gweler yr adran ar ansawdd dŵr uchod). Os oes rhagor o bryderon ynghylch gwaredu deunydd a garthwyd oherwydd canlyniadau'r profion gwaddod a gynhaliwyd, yna efallai y bydd angen cynnal asesiad pellach o effeithiau ei waredu ar bysgod a physgod cregyn. Cynghorwn gyflwyno rhestr o rywogaethau i'w hasesu gan yr Asesiad o'r Effaith Amgylcheddol fel derbynyddion pysgod a physgod cregyn i Gyfoeth Naturiol Cymru iddo gytuno iddi, er mwyn sicrhau y caiff yr holl rywogaethau angenrheidiol eu hasesu.

4.2.14.2 Yn ychwanegol at y llwybrau effaith a nodwyd yn Adran 5.5.4.2, fe'ch cynghorir y caiff yr holl effeithiau a ganlyn hefyd eu hystyried yn ystod yr Asesiad o'r Effaith Amgylcheddol ar gyfer derbynyddion pysgod a physgod cregyn:

- Sŵn, dirgryniad ac aflonyddwch ysgafn yn ystod yr holl weithgarwch adeiladu;
- Llusgo gân ddŵr, anafu a marwolaeth yn ystod gweithgarwch carthu;
- mygu yn ystod gweithgarwch carthu; a
- Colli cynefin yn uniongyrchol o weithgarwch adfer tir a charthu (yn ogystal â newid cynefinoedd yn anuniongyrchol o ganlyniad i newidiadau i brosesau hydrodynameg a gwaddodol sydd eisoes wedi'u harchwilio).

4.2.14.3 Bydd asesu'r llwybrau effaith uchod yn gallu llywio'r asesiad o effeithiau ar bysgodfeydd masnachol a hamdden yn yr ardal.

4.2.15 Rhywogaethau Gwarchodedig

4.2.15.1 Ystlumod

Rydym yn cytuno ag adroddiad Cwmpasu'r Asesiad o'r Effaith Amgylcheddol ei bod yn debygol y bydd ystlumod yn defnyddio'r safle ar gyfer chwilota / hedfan. Fel y manylir yn ein cyngor ar 13/5/2020, credwn y bydd angen Mesurau Osgoi Rhesymol (mewn perthynas â phlannu a lleihau gollyngiadau golau) i ddangos na fyddai'r cynigion yn niweidiol i statws cadwraethol ffafriol ystlumod.

4.2.15.2 Madfallod Cribog Mawr

Daw adroddiad Cwmpasu'r Asesiad o'r Effaith Amgylcheddol i'r casgliad na fyddai'r cynnig yn cael effaith ar Fadfallod Cribog Mawr. Fel y manylwyd yn ein cyngor ar 13/5/2020, rydym o'r farn, ar sail yr ychydig arolygon a gynhaliwyd, na ellir diystyru presenoldeb y Fadfall Gribog Fawr yn ei chyfnod daearol. Felly, byddem yn cynghori bod angen Mesurau Osgoi Rhesymol i ddangos na fyddai'r cynigion yn niweidiol i statws cadwraethol ffafriol y Fadfall Gribog Fawr.

4.2.16 Materion Eraill

4.2.16.1 Mae ein sylwadau uchod yn ymwneud yn unig ac yn benodol â materion sydd wedi'u cynnwys yn ein rhestr wirio, *Gwasanaeth Ymgynghorol Cynllunio datblygiadau: Pynciau Ymgynghorol* (Medi 2018), a gyhoeddir ar ein gwefan. Nid ydym wedi ystyried effeithiau posibl ar faterion eraill ac nid ydym yn diystyru'r posibilrwydd y bydd y datblygiad arfaethedig yn cael effaith ar fuddiannau amgylcheddol eraill.

4.2.16.2 Dylid cynghori'r ymgeisydd mai ei gyfrifoldeb ef yw sicrhau ei fod yn sicrhau nid yn unig ganiatâd cynllunio ond pob trwydded / caniatâd arall sy'n berthnasol i'w ddatblygiad.

4.3 Dŵr Cymru

- 4.3.1 Nid oes gennym unrhyw sylwadau i'w gwneud mewn perthynas â'r Adroddiad Cwmpasu.
- 4.3.2 Mae ymateb Dŵr Cymru'n seiliedig ar y wybodaeth a gyflwynir gan eich cais. Pe bai'r cynnig yn newid yn ystod y broses ymgeisio, gofynnwn yn garedig i chi ymgynghori â ni eto a'n bod yn cadw'r hawl i gyflwyno sylwadau newydd.

4.4 Y Weinyddiaeth Amddiffyn

- 4.4.1 Mae'r Weinyddiaeth Amddiffyn wedi cadarnhau nad oes ganddynt wrthwynebiadau diogelu i'r cynnig hwn.

5.0 Casgliad

- 5.1 Isod mae crynodeb o Farn Cwmpasu'r Cyngor. Sylwch nad yw hwn yn gynhwysfawr a dylai'r ymgeisydd sicrhau bod yr holl faterion a godir yn y Farn Cwmpasu hon yn cael sylw wrth lunio'ch Datganiad Amgylcheddol.
- i. Mae angen manylion ynglŷn â sut y diogelir mynediad i'r Llwybr Arfordirol yn ddiogel yn ystod y gwaith adeiladu. Dylai'r manylion hyn hefyd gynnwys sut y dylid hyrwyddo'r Llwybr Arfordirol unwaith y bydd y gwaith adeiladu wedi'i gwblhau.
 - ii. Dylai asesiad economaidd gymdeithasol gynnwys asesiad ar effeithiau twristiaeth. Bydd angen i'r ymgeisydd hefyd ystyried sut y dylid defnyddio'r buddion / cyfleoedd economaidd gymdeithasol i gydbwysu yn erbyn yr effeithiau amgylcheddol niweidiol posibl.
 - iii. Mae angen Asesiad manwl o'r Effaith ar Dreftadaeth i gefnogi unrhyw Ddatganiad Amgylcheddol.
 - iv. Mae angen Ymweld â Safle Archeolegol gyda Gwasanaeth Cynllunio Archeolegol Gwynedd i gadarnhau'r llinell sylfaen ar y safle.
 - v. Dylai'r cynnig gynnwys arolwg coedyddiaeth ar gyfer Porth y Felin a Soldiers Point (lle mae coed yn cwrdd â'r meini prawf sylfaenol sydd i'w cynnwys) i BS 5837 (2012) - Coed mewn Perthynas â Dylunio, Dymchwel ac Adeiladu a dylid ei ymgorffori yn yr asesiad o effaith a gyfyd, yn enwedig y cyfnod adeiladu.
 - vi. Lle mae llystyfiant wedi dylanwadu ar yr asesiad o effeithiau, yr argymhelliad yw tynnu lluniau newydd yn ystod misoedd y gaeaf. Dylid edrych ar luniau blaenorol i ystyried lle gallai fod amrywiadau tymhorol perthnasol.
 - vii. Mae'n amlwg bod gorgyffwrdd sylweddol rhwng gofynion yr Asesiad o'r Effaith Amgylcheddol a'r angen i osgoi colledion bioamrywiaeth cyffredinol a sicrhau gwelliant. Yn wyneb dyletswydd y Cyngor dan Ddeddf yr Amgylchedd Cymru (2016) i geisio cynnal a gwella bioamrywiaeth wrth gyflawni ei swyddogaethau, mae'r Cyngor yn amgáu copi o'r cyfarwyddiadau gan y Prif Gynlluniwr i Benaethiaid Cynllunio (Hydref 2019) ar arfer y ddyletswydd hon wrth gynllunio achosion. Dylai'r ymgeisydd ystyried gwella bioamrywiaeth yn y Datganiad Amgylcheddol.
 - viii. Cyflwynodd Cyfoeth Naturiol Cymru sylwadau manwl ar gais Adran 73 (VAR / 2020/20 / EIA) yn ei gyngor dyddiedig 13/5/2020. Dylai'r ymgeisydd ystyried y sylwadau hyn wrth lunio'r Datganiad Amgylcheddol. Amgaeir copi o ymateb Cyfoeth Naturiol Cymru (dyddiedig 13/05/2020).
 - ix. Fel y manylwyd yng nghyngor Cyfoeth Naturiol Cymru ar gais A73 ar 13/5/2020, erys pryder y gallai'r cynnig gynorthwyo lledaeniad *Didemnum vexillum* (Chwistrell fôr garped). Cyflwynwyd peth gwybodaeth yn Natganiad Amgylcheddol 2020 i gyfiawnhau'r asesiad o 'Dibwys / Ddim yn arwyddocaol' mewn perthynas â lleihau lledaeniad yn ystod gweithgarwch adeiladu / gweithredu. Mae Cyfoeth Naturiol Cymru yn croesawu'r datganiad yn adran 5.5.2.4 o adroddiad Cwmpasu'r Asesiad o'r Effaith Amgylcheddol y "cyflwynir asesiad risg bioddiogelwch". Mae angen cynnwys hyn yn y Datganiad Amgylcheddol neu mewn atodiad.
 - x. Mae posibilrwydd y gallai'r cynnig gynyddu pwysau hamdden ar Safle o Ddiddordeb Gwyddonol Arbennig ac Ardal Cadwraeth Arbennig Arfordir Ynys Gybi a chael effaith ar nodweddion arbennig y safleoedd. Mae angen nodi ac asesu mesurau lliniaru fel rhan o'r Datganiad Amgylcheddol cyfredol.
 - xi. Yn ymateb Cyfoeth Naturiol Cymru dyddiedig 13/5/2020, yn dilyn yr adolygiad o Ddatganiad Amgylcheddol 2020, bu iddynt gynghori ei bod yn annhebygol o gael effaith sylweddol ar Ardal Cadwraeth Arbennig Forol gogledd Môn (neu famaliaid morol a restrir dan Atodiad II neu Atodiad IV y Gyfarwydddeb Cynefinoedd). Roedd hyn yn seiliedig ar y ddealltwriaeth nad oedd angen drilio na pheilio (na chynnal unrhyw weithgaredd sy'n

debygol o gynhyrchu sŵn sylweddol). Mae Cyfoeth Naturiol Cymru yn cynghori y dylai'r Datganiad Amgylcheddol diwygiedig gadarnhau bod hyn yn wir.

- xii. Mae'n bosib y gallai'r cynigion diwygiedig, sydd bellach yn cynnwys carthu, gael effaith ar waith chwilota am adar arfordirol a morol oherwydd effeithiau dros dro ar adar ysglyfaethus yn ystod gweithgarwch carthu a gwaredu. Mae Cyfoeth Naturiol Cymru yn cynghori y bydd angen asesu effeithiau uniongyrchol ac anuniongyrchol carthu ar yr Ardaloedd Gwarchod Arbennig hyn yn llawn yn y Datganiad Amgylcheddol a nodi unrhyw fesurau lliniaru angenrheidiol.
- xiii. Mae angen cadarnhad a fwriedir gwneud unrhyw newidiadau i ôl troed / cynllun / dyluniad y morglawdd arfaethedig ers Datganiad Amgylcheddol 2020.
- xiv. Bydd angen i'r Datganiad Amgylcheddol asesu'n llawn unrhyw effeithiau a / neu newidiadau ar hydrodynameg a symudiad gwaddod yn sgil unrhyw newid i ddyluniad y morglawdd ac unrhyw effeithiau dilynol ar ddiddordeb ecolegol dros yr amserlenni adeiladu, gweithredu a datgomisiynu. Bydd angen ystyried ôl troed y morglawdd fel colli cynefin yn barhaol.
- xv. Nid yw Cyfoeth Naturiol Cymru yn cytuno y gellir edrych ar effeithiau gwaredu deunydd a garthwyd ar bysgod a physgod cregyn hyd nes eu bod wedi cael cyfle i edrych ar ganlyniadau'r profion gwaddod a gynhaliwyd ac y penderfynwyd bod y deunydd yn addas i'w waredu yn nhir gwaredu gogledd Caergybi. Os oes unrhyw bryderon gweddilliol ynghylch gwaredu deunydd a garthwyd oherwydd canlyniadau'r profion gwaddod a gynhaliwyd, yna efallai y bydd angen asesu ymhellach effeithiau ei waredu ar bysgod a physgod cregyn. Mae Cyfoeth Naturiol Cymru hefyd yn cynghori y dylid cyflwyno i Gyfoeth Naturiol Cymru iddynt gytuno iddi, restr o rywogaethau i'w hasesu gan yr Asesiad o'r Effaith Amgylcheddol, fel derbynyddion pysgod a physgod cregyn, er mwyn sicrhau y caiff yr holl rywogaethau angenrheidiol eu hasesu.
- xvi. Bydd yr ymgeisydd yn ystyried sylwadau Cyfoeth Naturiol Cymru a wnaed ar 13/05/2020 mewn perthynas â rhywogaethau a warchodir.

1.0 **Introduction**

- 1.1 On the 25th September 2020, the applicant Conygar Ltd. requested a Scoping Opinion from the Isle of Anglesey County Council (IACC) for the above proposal. In accordance with paragraph 14(4) of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017, the IACC must consult on and adopt the Scoping Opinion within 8 weeks (being the 20th November 2020), unless otherwise agreed with the applicant.
- 1.2 As stated in paragraph 14(1) of the Regulations, a person who is minded to make an EIA application may ask the relevant planning authority to state their opinion as to the scope and level of detail of the information to be provided in the environmental statement ("scoping opinion"). A request under paragraph (1) must include:
 - (i) a plan sufficient to identify the land;
 - (ii) a brief description of the nature and purpose of the development including its location and technical capacity;
 - (iii) its likely significant effects on the environment; and
 - (iv) such other information or representations as the person making the request may wish to provide or make;
- 1.3 The IACC believe that the Scoping Report submitted by the applicant in support of their Scoping Request under paragraph 14(1) adequately met the above criteria for the purposes of IACC providing a Scoping Opinion. The IACC consulted all statutory consultees and specialist internal Officers in preparing this Scoping Opinion. The structure of this Scoping Opinion therefore includes:
 - Background;
 - IACC Officer Responses;
 - Statutory Consultee Responses; and
 - Conclusions.

2.0 **Background**

- 2.1 The Holyhead Waterfront Regeneration Scheme being proposed by Conygar Holyhead Ltd, is located on Holy Island (Ynys Gybi) within Holyhead New Harbour, adjacent to the Great Breakwater. An Environmental Statement (ES) for the Proposed Development was submitted to the Isle of

- 2.2 The Proposed Development was awarded Outline Planning Permission, subject to a number of planning conditions, in 2014 (ref.19C1046A/EIA/ECON) ("the 2014 permission"). Condition 3 required the applicant to submit Reserved Matters by the expiration of 5 years from the date of this permission (being the 13th February 2019). The applicant did not submit a Reserved Matters application prior to this expiration date and consequently, the date by which they could submit Reserved Matters has now lapsed.
- 2.3 As a result, the applicant submitted a Section 73 (s.73) application to the IACC 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 (Condition 3) and to extend the time period for the development being implemented (Condition 4). A new and updated Environmental Statement (the '2020 ES') was produced in support of the s.73 application to reflect the environmental, socio-economic, policy and legislative changes since the original 2010 ES.
- 2.4 Whilst the Illustrative Masterplan which was submitted with the s.73 application was identical to the one approved by the 2014 permission, pre-application discussions on the Reserved Matters highlighted a number of changes that the applicant sought to make which were inconsistent with the 2014 permission. The IACC could not accept these changes as part of the 2014 permission and therefore, the applicant would require a new planning permission for these works.
- 2.5 As such, the following consents will be required to permit the construction and operation of the Proposed Development:
- Detailed Planning Permission from the IACC 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).
- 2.6 The applicant has submitted a Scoping Request for all three of the above. For consistency and alignment, the IACC will share our Scoping Opinion with NRW and the Welsh Government. This will ensure that the EIA adequately addresses the requirement for each consenting body.

3.0 IACC Consultee Responses

3.1 Planning Policy

- 3.1.1 The Joint Planning Policy Service (JPPS) would expect the EIA to include a summary of all the relevant national and local planning policies, including an assessment of how the proposed development complies with, or meets the policy objectives. The JPPS provides a summary of the relevant national and local planning policies below.

3.1.2 National Planning Policy - Planning Policy Wales (PPW) (Edition 10)

- 3.1.2.1 Housing: With regards to housing development, PPW states: *"New housing development in both urban and rural areas should incorporate a mix of market and affordable house types, tenures and sizes to cater for the range of identified housing needs and contribute to the development of sustainable and cohesive communities.... Maximising the use of suitable previously developed and/or underutilised land for housing development can assist regeneration and at the same time relieve pressure for development on greenfield sites"* (Paras 4.2.1 & 4.2.17).
- 3.1.2.2 Tourism: *"Tourism can be a catalyst for regeneration, improvement of the built environment and environmental protection....The planning system encourages tourism where it contributes to economic development, conservation, rural diversification, urban regeneration and social inclusion, while recognising the needs of visitors and those of local communities"* (Paras 5.5.1-5.5.2).
- 3.1.2.3 Infrastructure: *"Adequate and efficient infrastructure, including services such as education and health facilities along with transport, water supply, sewers, sustainable waste management, electricity and gas (the utilities) and telecommunications, is crucial for economic, social and environmental sustainability"* (Para 3.57).
- 3.1.2.4 Retail and Commercial: *"Retail and commercial centres are hubs of social and economic activity and the focal point for a diverse range of services which support the needs of local communities."* (Para 4.3.1).
- 3.1.2.5 Environment: *"The special and unique characteristics and intrinsic qualities of the natural and built environment must be protected in their own right, for historic, scenic, aesthetic and nature*

conservation reasons. These features give places their unique identity and distinctiveness and provide for cultural experiences and healthy lifestyles” (Para 6.0.2)

- 3.1.2.6 Section 5.3 of Planning Policy Wales provides further guidance in relation to harbour developments:-
- 3.1.2.7 *“Functional and attractive ports, harbours, marinas and inland waterways, which meet current and future demand, make Wales an attractive location for businesses, visitors and freight transportation. Support and investment in these facilities unlocks potential to boost the economy both directly, from the greater use of the facilities, and indirectly through the opportunities that improved maritime transport infrastructure provide for other sectors (both nationally and internationally).”* (Para 5.3.14)
- 3.1.2.8 Further guidance relating to the role of harbours and their current and future operations, including options for expansion and diversification is provided within the Welsh National Marine Plan.

3.1.3 National Planning Policy - Wellbeing of Future Generations Act 2015

- 3.1.3.1 In addition to the national and local policy framework, the applicant should also include an assessment against the relevant legislative framework in Wales. In particular, regard should be had to the Wellbeing of Future Generations Act 2015.
- 3.1.3.2 The Well-being of Future Generations Act requires public bodies in Wales to think about the long-term impact of their decisions, to work better with people, communities and each other, and to prevent persistent problems such as poverty, health inequalities and climate change. The Act requires public bodies (including the IACC) to carry out sustainable development and places a legal duty on them to do so.
- 3.1.3.4 Part 2 of the Act defines sustainable development as *“the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals”. In this context, the sustainable development principle means that public bodies “must act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own need”.*
- 3.1.3.5 The Planning (Wales) Act 2015 requires that any statutory body carrying out a planning function must exercise those functions in accordance with the principles of sustainable development as set out in the Wellbeing of Future Generations Act 2015.
- 3.1.3.6 The EIA should therefore include reference to how the proposed developments meets the 7 wellbeing goals as defined in the Act in order to allow the IACC to carry out its own assessment. Regard should also be had to other relevant legislation such as the Environment (Wales) Act 2016.

3.1.4 Local Planning Policy - Anglesey and Gwynedd Joint Local Development Plan (2016)

- 3.1.4.1 The following table provides a brief overview of the relevant local plan policies, which are of relevance to the proposed development:-

Policy	Explanation
PS 1: Welsh Language and Culture	Policy states the requirement to promote and support the Welsh language. Guidance is provided within the policy relating to the requirement to submit a Welsh Language Statement/Impact Assessment for various types of development. Further, the expectation relating to a bilingual signage scheme and the expectation that Welsh names will be used for new developments is also highlighted within the policy. In accordance with criterion 2 of the policy a Welsh Language Impact Assessment will be required.
PS 2 Infrastructure and developer contributions	New development is expected to ensure sufficient provision of essential infrastructure (either on-site or to service the site) is either already available or provided in a timely manner to make the proposal acceptable, by means of a planning condition or obligation.
ISA 1 Infrastructure Provision	Where proposals generate a directly related need for new or improved infrastructure and this is not provided by a service or infrastructure company, this must be funded by the proposal. A

	financial contribution may be sought to secure improvements in infrastructure, facilities, services and related works, where they are necessary to make proposals acceptable.
ISA 2: Community Facilities	Provides guidance on the provision of new facilities as part of developments subject to a number of conditions.
ISA 5: Provision of Open Spaces in New Housing Developments	New housing proposals for 10 or more dwellings, in areas where existing open space cannot meet the needs of the proposed housing development, will be expected to provide suitable provision of open spaces in accordance with the Fields in Trust benchmark standards of 2.4 hectares per 1000 population.
PS 4: Sustainable Transport, Development and Accessibility	All proposals should be located as to minimise the need to travel. Developments should maximise accessibility for all modes of transport, but particularly by foot, cycle and public transport.
TRA 1: Transport Network Developments	Improvements to the existing transport network will be granted provided they conform to a number of criteria.
TRA 2: Parking Standards	Parking provision for all modes of transport should be in accordance with the Councils' Parking Standards.
TRA 4: Managing Transport Impacts	Proposals should be planned and designed in a manner that promotes the most sustainable modes of transport having regard to a hierarchy of users. Proposals that would cause unacceptable harm to the safe and efficient operation of the highway, public transport and other movement networks including pedestrian and cycle routes, public rights of way and bridle routes, will be refused.
PS 5: Sustainable Development	All proposals should demonstrate how they are consistent with the principle of sustainable development.
PS 6: Alleviating and Adapting to the Effects of Climate Change	Criteria based policy which requires proposals to demonstrate how they have fully taken into account measures to alleviate the effects of climate change.
PCYFF 1: Development boundaries	Proposals within development boundaries will be permitted if they accord with other policies within the plan.
PCYFF 2: Development Criteria	Provides guidance as to how proposals should demonstrate compliance with relevant plan policies, National Planning policies and guidance. Further guidance is also provided relating to the general principle of development.
PCYFF 3: Design and place shaping	All proposals will be expected to demonstrate a high quality design which fully takes into account its context. Innovative and energy efficient design will be particularly encouraged.
PCYFF 4: Design and Landscaping	All proposals should demonstrate how consideration has been given to their surroundings, including due consideration to the Landscape Character Assessment /Seascape Character assessment.
PCYFF 5 Carbon Management	Proposals need to demonstrate how the energy hierarchy in policy PS 6 has been applied and how the contribution from renewable or low carbon energy has been maximised.
PCYFF 6: Water Conservation	All proposals should implement flood minimisation or mitigation measures where possible, to reduce surface water run-off and minimise its contribution to flood risk elsewhere. Proposals greater than 1,000 sq m should be accompanied by a Water Conservation Statement.
PS 13: Providing opportunity for a Flourishing Economy	Promotes facilitating economic growth whilst seeking to protect and enhance the natural and built environment.
CYF 1: Safeguarding, Allocating and Reserving Land and Units for Employment Use	It is recognized that these sites have an important role in maintaining and securing future employment opportunities, and therefore the intention is to protect them for those purposes.
CYF 3: Ancillary Uses on Employment Sites	The sites named in Policy CYF 1 and as identified on the Proposals Map are protected for employment/business uses in accordance with what is stated in Policy CYF 1. In exceptional circumstances it would be possible to consider applications for ancillary uses.
CYF 5: Alternative Uses of Existing Employment Sites	Proposals to release land on existing employment sites safeguarded for Use Classes B1, B2 or B8 in accordance with

	Policy CYF1 for alternative uses will be granted only in special circumstances, provided they conform to one or more of the stated criteria.
CYF 8: Holyhead Regeneration Area	Supports proposals located within the 'Holyhead Regeneration Area' which would aid the transformational change by encouraging Holyhead to become a more attractive location to live, work, visit and enjoy.
PS14: The Visitor Economy	Whilst ensuring compatibility with the local economy and communities and ensuring the protection of the natural, built and historic environment the Councils will support the development of a year-round local tourism industry.
TWR 1: Visitor Attractions and Facilities	Proposals to develop new visitor attractions and facilities or to improve and extend the standard of existing facilities will be encouraged to locate to sites within the development boundary.
MAN 1: Proposed Town Centre Developments	Proposals for new retail and leisure developments will be directed towards town centres in the first instance. Retail and commercial proposals outside the defined town centres will need to be supported by evidence of need for additional provision and satisfy the sequential approach set out in national planning policy and accord with other policies in the Plan.
MAN 3: Retailing Outside Defined Town Centres But Within Development Boundaries	Shops located outside defined town centres but within the development boundary will be safeguarded by refusing proposals for other uses unless it can be demonstrated that all the criteria can be met.
Policy TAI 1: Housing in Sub-regional Centre and Urban Service Centres	In the Sub-Regional Centre of Bangor and the Urban Service Centres, housing to meet the Plan's strategy will be delivered through housing allocations identified below and suitable windfall sites within the development boundary based upon the indicative provision.
TAI 8: Appropriate Housing Mix	This policy seeks to ensure that all new residential development contributes to improving the balance of housing and meets the identified needs of the whole community.
TAI 15: Affordable Housing Threshold and Distribution	Housing development, both new build and conversions, in settlements identified within the settlement hierarchy as shown in Strategic Policy PS 17 will be expected to make an affordable housing contribution.
TAI 16: Exception Sites	Support proposals for 100% affordable housing on sites immediately adjacent to development boundaries that form a reasonable extension to the settlement. With such proposals it must be demonstrated that there is a proven local need for affordable housing that cannot reasonably be delivered within a reasonable timescale on a market site inside the development boundary that includes a requirement for affordable housing
PS 19: Conserving and where appropriate enhancing the natural environment	In accordance with Strategic Policy PS19, measures should be undertaken to ensure that the Proposal conserves and where appropriate enhances the Plan area's distinctive natural environment and countryside.
AMG 3: Protecting and enhancing features and qualities that are distinctive to the local landscape character	Consideration should be given to protecting and enhancing features and qualities that are distinctive to the local landscape character. Details for each Landscape Character Area are contained within the Anglesey Landscape Strategy Update 2011, see link below.
AMG 4: Coastal protection	Measures should be taken to ensure that the Proposal doesn't cause unacceptable harm to:- • Water quality • Public Access consideration • The built environment, landscape and seascape character; • The area's biodiversity interest.
AMG 5: Local Biodiversity Conservation	Proposals must protect and where appropriate enhance biodiversity that has been identified as being important to the local area, through avoiding significant harm and considering

	opportunities to create and improve and manage wildlife habitats and natural landscape. A Proposal which affects sites of local biodiversity importance will be refused unless they can conform with the criteria as listed within the policy.
AMG 6 Protecting sites of Regional or Local Significance	Proposals that are likely to cause direct or indirect significant harm to Local Nature Reserve, Wildlife sites or regionally important geological / geomorphologic sites will be refused unless it can be proven there is an overriding social, environmental or economic need.
PS 20: Preserving and where appropriate enhancing heritage assets	Whilst seeking to support the wider economic and social needs of the Plan area, the LPA will preserve and where appropriate enhance its unique heritage assets. Regard should also be given to section 6.1 'The Historic Environment' of PPW in relation to Listed Buildings and Scheduled Ancient Monuments.
AT 1 Conservation Areas, World Heritage Sites and Registered Historic Landscapes, Parks and Gardens	Proposals affecting the setting and / or significant views into and out of such designations should have regard to the relevant strategies / management plans.
AT 3 Locally or Regionally Significant Non-Designated Heritage Assets	Proposals required to conserve and seek opportunities to enhance buildings, structures and areas of locally or regionally significant non-designated heritage assets.

Below are links to specific documents referred to above:

JLDP Written Statement: <https://www.gwynedd.llyw.cymru/en/Council/Documents---Council/Strategies-and-policies/Environment-and-planning/Planning-policy/Anglesey-and-Gwynedd-Joint-Local-Development-Plan-Written-Statement.pdf>

Adopted JLDP Supplementary Planning Guidance's:
<https://www.anglesey.gov.uk/en/Residents/Planning-building-control-and-conservation/Planning-policy/Supplementary-Planning-Guidance.aspx>

Anglesey Landscape Strategy Update 2011:
<https://www.anglesey.gov.uk/en/Residents/Planning-building-control-and-conservation/Planning-policy/Joint-Local-Development-Plan-Anglesey-and-Gwynedd/Joint-Local-Development-Plan-supporting-documents.aspx>

Landscape Sensitivity & Capacity Study (2014): <https://www.gwynedd.llyw.cymru/en/Council/Strategies-and-policies/Environment-and-planning/Planning-policy/Joint-Local-Development-Plan/Submitted-LDP-Documents.aspx>
(see document DC.020 in the list)

Wellbeing of Future Generations Act 2015: <https://futuregenerations.wales/about-us/future-generations-act/>

National Planning Policy - Planning Policy Wales (Edition 10): <https://gov.wales/sites/default/files/publications/2018-12/planning-policy-wales-edition-10.pdf>

Technical Advice Notes (TANs):
<https://gov.wales/technical-advice-notes>

3.2 Landscape and Visual

3.2.1 The application site is not within a designated landscape; however, the proposed study area includes an area of the AONB. It is with the Newry Beach Conservation Area, which includes area of designed landscape and garden areas within the setting of listed buildings. The Wales Coast Path passes through the site and on to the AONB giving panoramic views of Holyhead port.

3.2.2 1.3 With regard to the purpose of the report and specifically the proposed Landscape, Seascape and Visual Impact Assessment the following matters are relevant.

1. The Study Area
2. Legislative changes
3. Additional matters that need to be included
4. Cumulative matters to be included
5. Methodology for assessment of significance

1. The study area (1.5): it is agreed that this be set at a 2km radius. As noted in 5.4.2, and shown in Table 5.2 and Figure 5.1, viewpoint locations were agreed in January 2020.

2. Legislative changes: with regard to 2.5 The AONB Management Plan <https://www.anglesey.gov.uk/documents/Docs-en/Countryside/Anglesey-AONB-Management-Plan-2015-%E2%80%93-2020.pdf> and subsequent revisions is relevant particularly with regard to the EIA's assessment of the effects on AONB Special Qualities and Features.
3. Additional matters that need to be included. The proposal should include an arboricultural survey for Porth y Felin and Soldiers Point (where trees meet the minimum criteria to be included) to BS 5837 (2012) – Trees in Relation to Design, Demolition and Construction and should be incorporated into the assessment of effect arising, in particular the construction phase.
4. It is noted in 5.4.4 that viewpoint photos taken in 2019 would be reused. Where vegetation has influenced the assessment of effects, it is recommended that should new photography be undertaken in winter months previous images should be reviewed to consider where there may be material seasonal variation.
5. Cumulative matters to be included: There are listed in 6.2. The IACC do not propose any further proposals on the basis of information available in respect of landscape and visual impacts.
6. Methodology for assessment of significance: This is described in 10.1.1 and illustrated in Table 10.1. It is accepted that the significance of effects is influenced by professional judgement and not necessarily defined by the column/row in which they are placed; however, greater detail is required on this with regard to the sensitivity of each likely Landscape, Seascape and Visual receptor and the zones within the table where significant effects are considered likely.
7. There should be appropriate cross referencing of images and assessments between the Landscape, Seascape and Visual Impact Assessment and the Heritage Impact Assessment for viewpoint within the CA or the setting of the listed buildings.

3.2.3 **Mitigation**

- 3.2.3.1 The role of landscape design (and design) as mitigation, conservation/preservation and enhancement is noted in 3.3.3 and 10.1.2. The type 3 photomontages proposed in 5.4.4 should be to AVR level 2 and 3 (appropriate to the viewpoint distance) in order to aid this process.

3.3 Ecology

- 3.3.1 The below comments are made by the IACC's Ecological Advisor.
- 3.3.2 **4.4 Section 73 Consultation responses – see p33.** The IACC note that comments made by the IACC to the Section 73 consultation on need for mitigation are included, and that it is acknowledged that 'these comments will be considered in the ES' (end of p33).
- 3.3.3 Note there is clearly a substantial overlap between EIA requirements and the **need to avoid overall biodiversity losses and achieve enhancement** in view of the Council's duty under the Environment Wales Act (2016) to seek to maintain and enhance biodiversity whilst carrying out its functions, and instructions from the Chief Planner to Heads of Planning (Oct 2019) on application of this duty in planning cases. Losses will occur in landward areas but also intertidal (and sub-tidal) areas. In terms of the 2016 Act, the mitigation and enhancement required will have to cover more than only land impacts. As the IACC have acknowledged earlier, achieving like-for-like replacement for losses of beach, rocky shore and other habitats is unlikely to be practical, therefore, robust provisions will need to be made from other options, such as potentially enhancing a range of coastal land habitat areas for example. This presents a serious challenge. Further discussions are required with the IACC and NRW on potential mitigation options.
- 3.3.4 **A copy of the letter referred to above is appended to this Scoping Opinion for information. The IACC advise that the same care being taken for the EIA will need to be applied in order to meet these Wales specific requirements.**
- 3.3.5 **5.5 Ecology and Nature Conservation (p46):**
- 3.3.6 **5.5.1 Terrestrial Ecology:** This appears basically satisfactory. Whilst the surveys undertaken to date appear to cover requirements, there will have to be provision made for update surveys/ pre-works checks and so forth, as appropriate, for example through planning conditions.
- 3.3.7 **5.5.2 Intertidal and Benthic Ecology, 5.5.3 Ornithology and other ecology areas:** The IACC will not comment on these in any detail as they will be subject to NRW specialist attention.

3.3.8 **7 Habitats Regulations Assessment** (p85): The potential trampling of SAC habitat identified in the 2020 ES has been covered in an Appropriate Assessment (AA) agreed with NRW in October 2020. IACC (and NRW) are aware that any changes to proposals, or other reasons that may arise that could trigger review and possible modification of the AA in future will need to be duly covered.

3.3.9 **9 Approach to Providing Required Information** (p89): Noted. Please see notes on 4.4 above.

3.3.10 **10 Proposed Approach to EIA** (p91): Approach noted.

3.4 Highways

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

3.4.2 The commencement of the Development shall not take place until there has been submitted to and approved in writing by the LPA, a Construction Traffic Management Plan (CTMP). The CTMP shall include;

- i. The routing to and from the site of construction vehicles, plant and deliveries.
- ii. The type size and weight of construction and delivery vehicles to be used in connection with the construction of the development, having regard to the geometry, width, alignment and structural condition of the highway network along the access route to the site;
- iii. The timing and frequency of construction and delivery vehicles to be used in connection with the development, having regard to minimising the effect on sensitive parts of the highway network and construction routes to the site, including regard for sensitive receptors e.g. schools and network constraints;
- iv. Measures to minimise and mitigate the risk to road users in particular non-motorised users;
- v. The arrangements to be made for on-site parking for personnel working on the Site and for visitors;
- vi. The arrangements for loading and unloading and the storage of plant and materials;
- vii. Details of measures to be implemented to prevent mud and debris from contaminating the adjacent highway network;

3.4.3 The construction of the Development shall be completed in accordance with the approved Plan.

3.4.4 Reason: To ensure reasonable and proper control is exercised over construction traffic and construction activities in the interests of highway safety.

3.5 Public Protection

3.5.1 Having reviewed this Scoping Report, the Public Protection department accepts the contents and the approach to mitigation for environmental health related issues: such as noise and vibration, air quality and the general environmental management systems to be adopted for the duration of the development.

3.5.2 Public Protection have no further comments to add at this time.

3.6 Health & Safety

3.6.1 The development must comply with the requirements of the Health and Safety at work etc. Act 1974, and all regulations made under that Act.

3.7 Coastal Path

3.7.1 The IACC would advise that the Isle of Anglesey Coastal Path runs through the proposed site, and is also promoted as part of the Wales Coast Path.

3.7.2 Should the application be approved it is important that the Coastal Path is kept available and safe during any works. The IACC would therefore request further discussions and details with regards to how access to the Coastal Path will be safely maintained during construction and promoted thereafter once construction is complete.

3.8 Cultural Heritage

3.8.1 Although the Environmental Scoping Report is quite a hefty document, it does not contain a great deal of information with regards to the surrounding built heritage (5.11). Most of the historical aspects contained in the document are in relation to archaeology which is for GAPS to assess. However, it does state under item 5.11.4, that there is a need to understand the potential impacts and mitigation required for any non-designated asset.

- 3.8.2 The IACC is not sure whether, under 5.11.4 1b the word 'basic' in the following is appropriate: *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;*
- 3.8.3 However, it will be the submission of Heritage Impact Assessments that will offer the opportunity to provide the appropriate detailed information necessary to evaluate the impact of the proposals on the surrounding heritage assets. The IACC would therefore expect a detailed Heritage Impact Assessment to be submitted to the IACC as part of any ES in support of a full planning application.
- 3.8.4 The IACC does have significant concern with regards to the continuing dilapidation of the Soldiers Point and Porth y Felin House. The IACC will seek to agree, through an appropriate Phasing Strategy, that these buildings will be redeveloped as early as possible in the construction programme.

3.9 Cumulative Impacts

- 3.9.1 The IACC note the applicant's intention to undertake a Cumulative Impact Assessment. The IACC accepts the proposed developments that will be included within the scope of the CIA (6.2). The Scoping Report states that these projects and any others identified during the EIA process will be monitored so that the CIA can be updated accordingly. The IACC supports this approach, as the cumulative impacts needs to be assessed at the point of determination and not only at the point of submission. The IACC will therefore inform the applicant of any other development which we believe may need to be included as part of any cumulative assessment (as necessary).
- 3.9.2 Given the number of major development proposed in and around the port of Holyhead (namely Breakwater Refurbishment, Holyhead Marina Re-Build, Holyhead Port Expansion and Morlais) the IACC believes that particular regard should be had to these development proposals during the assessment of cumulative effects (particularly during construction). There is a distinct possibility that all of these projects could be constructed at the same time and therefore, appropriate mitigation measures may need to be identified.

3.10 Socio-Economic

- 3.10.1 The IACC broadly accepts the approach and methodology to the assessment of socio-economic effects. However, the IACC would have expected tourism to be included within this chapter given its importance to the local and regional economy. Detail is also required on supply chain opportunities (construction and operation) in addition to business rates. This development offers significant socio-economic opportunities to local people and businesses and this needs to be reflected in the ES.
- 3.10.2 The IACC is concerned that a number of the developments proposed in the 2010 application has now either been removed or scaled down (e.g. commercial and leisure, hotel, museum etc.). These socio-economic benefits were material considerations which were given weight in the original decision making process. Eliminating these elements from the development fundamentally changes the nature of the development. The IACC is eager to understand what other socio-economic benefits / community benefits are likely to materialise from this development to balance against the potential harmful impacts on ecology, landscape, local housing market etc. Without these socio-economic benefits, the application is essentially a large residential scheme and not the transformational regeneration project as described.
- 3.10.3 The IACC is eager to work with the applicant to identify the socio-economic benefits and opportunities from the proposed development to ensure that the regeneration opportunities of the proposal are realised. These mitigation measures will then need to be secured by condition or s.106 agreement as necessary. Given the proposed development's location outside of the development boundary, the IACC cannot emphasise enough the importance of socio-economic benefits and opportunities in the decision making process.

4.0 Statutory Consultees

4.1 GAPS

- 4.1.1 From an initial look at the scoping report, the scope of the archaeological assessment appears to be appropriate. GAPS would suggest that change since the previous report is most likely to have occurred on site rather than in the archive sources, and a site visit should therefore be included as part of the baseline update.

4.2 Natural Resources Wales (NRW)

- 4.2.1 Please note that NRW's comments are without prejudice to any comments we may wish to make when consulted on any subsequent planning applications or on the submission of a more detailed

scoping report or the full Environmental Statement. At the time of any planning application there may be new information available which we will need to take into account in making a formal response.

- 4.2.2 These comments include those matters NRW consider will need to be taken into consideration and applied to the Environment Impact Assessment (EIA) and the resulting Environmental Statement (ES).

4.2.3 General comments

- 4.2.3.1 NRW provided detailed comments on the Section 73 application (VAR/2020/20/EIA) in its advice dated 13/5/2020. This application was supported by an EIA (referred to as the '2020 ES' in the EIA Scoping Report) which provided updated baseline information and assessment from the scheme approved in 2014. We note that the scheme has now been revised and the proposed changes are summarised in section 1.2.2 of the EIA Scoping Report. The ES that will support a new application will need to be updated to fully assess any likely significant effects arising from the proposed changes. Our advice below will mainly focus on those effects arising from the changes to the scheme described in section 1.2.2, however we would refer the applicant to the advice in our letter dated 13/5/2020 which provided a number of comments that should be addressed, alongside the comments below.

- 4.2.3.2 When developing the EIA methodology (as described in section 10.1.1 of the EIA Scoping report), it is advised that written criteria for each of the magnitude and sensitivity levels is provided to give an audit trail of the assignment of receptors to magnitude and sensitivity criteria.

4.2.4 Flood Risk

- 4.2.4.1 The EIA Scoping report indicates that the scheme proposes highly vulnerable development. Our Flood Risk Map confirms the site to be within Zone C2 of the Development Advice Map (DAM) contained in TAN15.

- 4.2.4.2 We refer you to Section 6 of TAN15 and the Chief Planning Officer letter from Welsh Government, dated 9 January 2014, which affirms that highly vulnerable development and emergency services should not be permitted in Zone C2 (paragraph 6.2 of TAN15). The justification tests in paragraph 6.2 of TAN15 do not apply to highly vulnerable development or emergency services in Zone C2.

- 4.2.4.3 In the first instance, your Authority should make a planning policy decision on the application. Therefore, unless we receive written confirmation from your Authority that you believe there are overriding reasons to consider progressing the planning application, despite the site's location within Zone C2, we do not intend to provide advice on the EIA / FCA.

- 4.2.4.4 The decision as to whether a development should be considered contrary to TAN15 policy is entirely a matter for your Authority. However, if you provide overriding reasons and require our EIA scoping advice on flood risk, we provide the following advice:

- 4.2.4.5 We note that the proposal will include an updated Flood Consequence Assessment and that a new marina breakwater is proposed so that the impacts of potential wave action will be reduced. The inclusion of a parapet (new flood defence) wall and minimum finished floor levels are noted. The updated FCA would also need to consider the benefits that the Great Breakwater has on wave action and any residual risks should it breach during the 100 years lifetime of development (noting consideration that no maintenance be presumed on the structure). We advise that this needs expanding and a detailed analysis included in the updated FCA.

- 4.2.4.6 Finally, as your Authority will be aware, under the Town & Country Planning (Notification) (Wales) Direction 2012 and more specifically Category I relating to Flood Risk Area Development, where the Planning Authority is minded to grant permission, there is a requirement to refer applications for emergency services or highly vulnerable development within Zone C2 to Welsh Government.

4.2.5 Protected Landscape

- 4.2.5.1 The proposal is located partly within the Ynys Môn / Anglesey Area of Outstanding Natural Beauty (AONB).

- 4.2.5.2 The EIA will need to fully assess the impacts of the proposal (as revised) on views from the AONB. The viewpoints set out in Figure 5.1 are accepted. Figure 5.1 viewpoint locations needs to show the AONB and any sections of Heritage Coast that might also lie within this area, to better represent the landscape and visual context.

4.2.5.3 The development's visual integration and avoidance of visual prominence is an important development strategy for this site, to avoid unnecessary visual effects upon the public views from the AONB.

4.2.5.4 The colour of roofs, elevations and control of lighting specifically need to be addressed in the scheme design. Strategic tree planting along Beach Road/ the Greens could help soften the disparate land use zones, which here comprise sea edge development, exposed featureless green space corridor and residential development.

4.2.5.5 The applicant may also wish to consider the advice we provided in our letter dated 13/5/2020 on the S73 application.

4.2.6 Protected Sites

4.2.6.1 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

4.2.6.2 The ES will need to identify impact pathways for protected sites, clearly assess the possible levels of impact and, where impacts are likely, should provide full details of appropriate mitigation measures to address those impacts.

4.2.6.3 With regard to section 7.4, it is advised that we are engaged on the updated Shadow HRA screening report prior to the appropriate assessment being conducted to ensure that all the necessary features are assessed.

4.2.7 Invasive species

4.2.7.1 As detailed in our advice on the S73 application on 13/5/2020, we have concerns that the proposal could aid the spread of *Didemnum vexillum* (Carpet sea-squirt). Limited information was presented in the 2020 ES to justify the assessment of 'Negligible / Not significant' in relation to minimising spread during construction / operation activities. We consider that in the absence of good biosecurity measures for construction and operational activities, the proposed development has the potential to spread marine Invasive Non-Native Species (INNS), thereby potentially impacting the features of marine SACs around Wales e.g. Menai Strait and Conwy Bay SAC.

4.2.7.2 We welcome the statement in section 5.5.2.4 of the EIA Scoping report that 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*". We would expect this information to be included within the ES or as an appendix to the ES.

4.2.8 Recreational pressure

4.2.8.1 The proposal has the potential for increased recreational pressure on the Holy Island Coast SSSI and SAC, which could impact on the special features of the sites. In our review of the 2020 ES, we advised in our response of 13/5/2020 that "*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*". We advised the imposition of conditions (or section 106 obligation) to secure detailed mitigation and the associated funding.

4.2.8.2 We agree that the changes to the proposed development as described in section 1.2.2 are unlikely to result in additional significant effects, above and beyond that assessed in the 2020 ES. However, we would recommend that the applicant considers the provision of detailed mitigation measures in the updated ES.

4.2.9 Marine mammals

- 4.2.9.1 In our response dated 13/5/2020, following the review of the 2020 ES, we advised that there was unlikely to be a significant effect on the North Anglesey Marine SAC (or marine mammals listed under Annex II or Annex IV of the Habitats Directive). This was based on the understanding that no drilling and pilling (or any activity likely to generate significant noise) was required. We advise that the revised ES should confirm that this is the case following the changes to the proposals, as described in section 1.2.2.
- 4.2.9.2 We note that revised proposal is to reduce the number of marine berths from 500 to 250 and that there will be reduced boat traffic during the operational phase. We agree that the proposed alterations to the works would constitute an alteration in the potential impacts to marine mammals via the pathways outlined in Section 5.5.5.3 and Section 7.3.2 (i.e. that the proposed possible dredging in the revised scheme may cause an increase in underwater noise and boat traffic during dredging and may impact on prey availability (or smothering of the prey's habitat) during dredging and disposal). We agree with the proposed approach to provide the required information outlined in Section 5.5.5.4 and that Section 7.4 should be updated to reflect the revised proposed development. We are also satisfied with the description of how impacts via noise will be re-assessed in Section 5.9.4, in that noise assessments will be re-calculated to reflect the updated description of works. The suitability of the described re-assessment, and updated Shadow HRA, to accurately reflect the new works will be determined upon receipt of those documents.
- 4.2.10 Ornithology**
- 4.2.10.1 In our response dated 13/5/2020 based on the 2020 ES, we advised that we agreed with the conclusions that the proposal would not have adverse effects on the Holy Island Coast SPA (whose feature includes chough). In view of the revised scheme described in 1.2.2, we consider that the specific changes are unlikely to result in an adverse effect on the SPA.
- 4.2.10.2 In relation to the Anglesey Terns SPA and Liverpool Bay SPA, in reviewing the 2020 ES we advised that the proposal would not have an adverse effect on these SPAs. However, as detailed in section 5.5.3.3 of the Scoping Report, the revised proposals, which now include dredging, has the potential to impact on foraging coastal and marine birds due to temporary effects on the availability of prey resources during dredging and disposal activities. We advise that the direct and in-direct effects of dredging on these SPAs will need to be fully assessed in the ES, and any necessary mitigation measures identified. This information should also inform the applicant's Shadow HRA.
- 4.2.11 Coastal Processes**
- 4.2.11.1 Section 1.5 of the report describes the study area as 2km, being based on potential effects from changes in hydrodynamics and sediment transport (which includes changes within the revised project proposal). It is also stated that the 2km will be informed by the modelling undertaken as described in section 5.1.4. Currently the 2km radius intersects the beach at Penrhos, due to the pocket beach nature of the coastline round North Anglesey, it would be recommended that the study area be extended to the East to the headland at Penrhos at a minimum and potentially further if the modelling shows this to be needed.
- 4.2.11.2 It is noted that capital dredge arisings will be considered for deposition at Holyhead North disposal ground. Currently, Holyhead North is known to be effective at dispersing non-consolidated fines, however if sediment of a different composition is required to be disposed of, this will need a specific environmental assessment. The capacity of the site will also need to be considered in relation to other projects and pressures within the area, as identified in the cumulative assessment section 6.2.
- 4.2.11.3 Section 5.2.2.3 states that habitat loss under the footprint of the breakwater was covered in the '2020 ES' and it does not refer to any changes in footprint of the breakwater. It is unclear if there are any changes to the design structure of the breakwater. The ES will need to fully assess any impacts and/or changes on hydrodynamics and sediment movement as a result of any design variation to the breakwater and any subsequent effects on ecological interest over the construction, operation and decommissioning timescales.
- 4.2.12 Marine Water Quality / Water Framework Directive (WFD)**
- 4.2.12.1 Section 5.8.3.1 of the Scoping report highlights the key issues identified in the 2020 ES. Please note, in our response dated 13/5/2020 (Annex 1 of the letter), we provided a number of comments relating to marine water quality and WFD. We advise that the applicant fully considers and addresses the comments raised in Annex 1 of that response as part of any updated ES.
- 4.2.12.2 In relation to new baseline information, section 5.8.2.2 of the Scoping report states that "*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". We note that disposal at Holyhead North will be subject to a Marine Licence application from NRW. We also note that the applicant will be requesting EIA Scoping advice from NRW's Permitting Service with respect to the Marine Licence.

- 4.2.12.3 Section 5.8.3.2 highlights the changes (relating to dredging now proposed) since the 2020 ES was produced and refers to the following key issue that is now relevant: "*Contamination of marine water and sediment quality through dredging and disposal activities during construction*". We advise that the effects of dredging and dredge disposal on marine water quality will need to be fully assessed in the ES, and any necessary mitigation measures identified. This information should also inform the applicant's revised Shadow HRA and revised WFD compliance assessment.
- 4.2.12.4 Section 4.3 of the report highlights that NRW's Marine Licensing Team were previously consulted with respect to the Sediment Sample Plan. As stated in section 1.1 of the Scoping Report, a scoping opinion should be requested from NRW's Marine Licensing Team with respect to the works subject to a Marine Licence.
- 4.2.12.5 It is unclear whether the changes proposed to the breakwater will include changes to its design. NRW advises that any changes to the breakwater design will need to be adequately assessed and the footprint of the breakwater will need to be considered as permanent habitat loss.
- 4.2.12.6 If further surveys are required to investigate the footprint of the breakwater (if this differs from its current design and further surveys are required) then an analysis of the material will be required for contaminants and particle size analysis before it can be determined as suitable for the dredged arisings to be kept in the marine environment (i.e. disposed of at Holyhead North licensed disposal ground).
- 4.2.12.7 We welcome the statement provided by the Applicant in Section 5.8.4, that the results of the sediment sampling will be used to assess impacts on water and sediment quality. We also advise that it will be necessary to consider this information in the context of potential effects on biota.

4.2.13 Benthic Ecology

- 4.2.13.1 Section 5.2.2.3 states that habitat loss under the footprint of the breakwater was covered in the '2020 ES' and it does not refer to any changes in footprint of the breakwater. It is unclear if there are any changes to the design structure of the breakwater. We refer the applicant to our advice on Coastal Processes given above whereby: "*The ES will need to fully assess any impacts and/or changes on hydrodynamics and sediment movement as a result of any design variation to the breakwater and any subsequent effects on ecological interest over the construction, operation and decommissioning timescales.*"
- 4.2.13.2 We agree with the below additional key issues identified in Section 5.5.2.3 to be assessed in the 2020 ES following the changes to the application:
- "*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.*
 - *That the littoral and sublittoral rock habitats within the footprint of the Proposed Development should be considered as Annex I rocky reef habitat.*
 - *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*".
- 4.2.13.3 We advise that these key issues will need to be fully assessed in the ES, and any necessary mitigation measures identified. This information should also inform the applicant's revised Shadow HRA (as supporting habitat) and revised WFD compliance assessment.
- 4.2.13.4 We welcome that the applicant will consider and address the comments raised in Annex 1 of our response dated 13/5/2020 (particularly in relation to Annex 1 rocky reef habitat) as part of any updated ES. We also refer to our comments above (Protected Sites) in relation to marine invasive non-native species that may impact on benthic ecology.
- 4.2.13.5 In Section 5.5.2.4 the applicant says "*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.*" We welcome this approach and we would be happy to engage in a discussion with the applicant to develop a survey design fit for purpose. We also advise

the applicant 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.

4.2.14 Fish and Shellfish Resources

4.2.14.1 We welcome the inclusion of consideration of fish and shellfish within the EIA as stated in Section 5.5.4. However, we do not agree that the effects of the disposal of dredged material upon fish and shellfish can be scoped out until we have had the opportunity to review the results of the sediment testing conducted, and it has been determined that the material is suitable for disposal at Holyhead North disposal ground (see section on water quality above). If there are any residual concerns on the disposal of dredged material due to the results of the sediment testing conducted, then further assessment of the effects of its disposal upon fish and shellfish may be required. We also advise that a list of species to be assessed by the EIA as fish and shellfish receptors is provided to NRW for agreement, to ensure that all the necessary species are assessed.

4.2.14.2 In addition to the impact pathways identified in Section 5.5.4.2, it is advised that the following effects are all also considered during the EIA for fish and shellfish receptors:

- Noise, vibration and light disturbance during all construction activities;
- Entrainment, injury and mortality during dredging activities;
- Smothering during dredging activities; and
- Direct loss of habitat from land reclamation and dredging activities (in addition to indirect habitat alteration as a result of changes to hydrodynamic and sedimentary processes already scoped in).

4.2.14.3 The assessment of the above impact pathways will be able to inform the assessment of effects upon commercial and recreational fisheries in the area.

4.2.15 Protected Species

4.2.15.1 Bats

We agree with the EIA Scoping report that the site is likely to be used by bats for foraging/commuting. As detailed in our advice on 13/5/2020, we advise that Reasonable Avoidance Measures (in relation to planting and minimizing light spillage) will be required to demonstrate that the proposals would not be detrimental to the favourable conservation status of bats.

4.2.15.2 Great crested newts (GCNs)

The EIA Scoping report concludes that the proposal would not impact on GCNs. As detailed in our advice on 13/5/2020, we consider that, based on the limited surveys undertaken, that GCN presence in their terrestrial phase cannot be ruled out. We would therefore advise that Reasonable Avoidance Measures will be required to demonstrate that the proposals would not be detrimental to the favourable conservation status of GCNs.

4.2.16 Other Matters

4.2.16.1 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 environmental interests.

4.2.16.2 The applicant should be advised that, in addition to planning permission, it is their responsibility to ensure that they secure all other permits/consents relevant to their development.

4.3 Dwr Cymru Welsh Water (DCWW)

4.3.1 We have no comments to make in relation to the Scoping Report.

4.3.2 DCWW response is based on the information provided by your application. Should the proposal alter during the course of the application process we kindly request that we are re-consulted and reserve the right to make new representation.

4.4 Ministry of Defence (MOD)

4.4.1 MOD has confirmed that they have no safeguarding objections to this proposal.

5.0 Conclusion

- 5.1 Below is a summary of the IACC's Scoping Opinion. Note this is not exhaustive and the applicant should ensure that all matters raised in this Scoping Opinion are addressed when formulating your Environmental Statement (ES).
- i. Details with regards to how access to the Coastal Path will be safely maintained during construction is required. This should also contain details on how the Coastal Path is to be promoted once construction is complete.
 - ii. Socio-economic assessment should include an assessment on tourism impacts. The applicant will also need to consider how the socio-economic benefits / opportunities be used to balance against the potential harmful environmental impacts.
 - iii. A detailed Heritage Impact Assessment is required in support of any ES.
 - iv. Archaeological Site Visit is required with GAPS to confirm the on-site baseline.
 - v. The proposal should include an arboricultural survey for Porth y Felin and Soldiers Point (where trees meet the minimum criteria to be included) to BS 5837 (2012) – Trees in Relation to Design, Demolition and Construction and should be incorporated into the assessment of effect arising, in particular the construction phase.
 - vi. Where vegetation has influenced the assessment of effects, it is recommend that new photography be undertaken in winter months. Previous images should be reviewed to consider where there might be material seasonal variations.
 - vii. There is clearly a substantial overlap between EIA requirements and the need to avoid overall biodiversity losses and achieve enhancement. In view of the Council's duty under the Environment Wales Act (2016) to seek to maintain and enhance biodiversity whilst carrying out its functions, the IACC enclose a copy of the instructions from the Chief Planner to Heads of Planning (Oct 2019) on the application of this duty in planning cases. The applicant should consider biodiversity enhancement in the ES.
 - viii. NRW provided detailed comments on the Section 73 application (VAR/2020/20/EIA) in its advice dated 13/5/2020. The applicant should take these comments into consideration when producing the ES. A copy of NRW's response (dated 13/05/2020) is enclosed.
 - ix. As detailed in NRW's advice on the S73 application on 13/5/2020, concern remains that the proposal could aid the spread of *Didemnum vexillum* (Carpet sea-squirt). Limited information was presented in the 2020 ES to justify the assessment of 'Negligible / Not significant' in relation to minimising spread during construction / operation activities. NRW welcome the statement in section 5.5.2.4 of the EIA Scoping report that a "biosecurity risk assessment will be submitted". This needs to be included in the ES or in an appendix.
 - x. The proposal has the potential for increased recreational pressure on the Holy Island Coast SSSI and SAC, which could impact on the special features of the sites. Mitigation measures need to be identified and assessed as part of the updated ES.
 - xi. In NRW's response dated 13/5/2020, following the review of the 2020 ES, they advised that there was unlikely to be a significant effect on the North Anglesey Marine SAC (or marine mammals listed under Annex II or Annex IV of the Habitats Directive). This was based on the understanding that no drilling and pilling (or any activity likely to generate significant noise) was required. NRW advise that the revised ES should confirm that this is the case.
 - xii. The revised proposals, which now include dredging, has the potential to impact on foraging coastal and marine birds due to temporary effects on the availability of prey resources during dredging and disposal activities. NRW advise that the direct and in-direct effects of dredging on these SPAs will need to be fully assessed in the ES, and any necessary mitigation measures identified.
 - xiii. Confirmation is required as to whether there are any changes proposed to the footprint / layout / design of the proposed breakwater since the 2020 ES.
 - xiv. The ES will need to fully assess any impacts and/or changes on hydrodynamics and sediment movement as a result of any design variation to the breakwater and any subsequent effects on ecological interest over the

construction, operation and decommissioning timescales. The footprint of the breakwater will need to be considered as permanent habitat loss.

- xv. NRW do not agree that the effects of the disposal of dredged material upon fish and shellfish can be scoped out until they have had the opportunity to review the results of the sediment testing conducted, and it has been determined that the material is suitable for disposal at Holyhead North disposal ground. If there are any residual concerns on the disposal of dredged material due to the results of the sediment testing conducted, then further assessment of the effects of its disposal upon fish and shellfish may be required. NRW also advise that a list of species to be assessed by the EIA as fish and shellfish receptors be provided to NRW for agreement, to ensure that all the necessary species are assessed.
- xvi. Applicant to consider NRW's comments made on the 13/05/2020 in relation to protected species.

DYDDIAD Y PENDERFYNIAD 20/11/2020 DATE OF DECISION



**DEWI FRANCIS JONES
PRIF SWYDDOG CYNLLUNIO / CHIEF PLANNING OFFICER**

Croeso i chi ddelio gyda'r Cyngor yn Gymraeg neu'n Saesneg. Cewch yr un safon o wasanaeth yn y ddwy iaith.

You are welcome to deal with the Council in Welsh or English. You will receive the same standard of service in both languages.

A2 NRW Scoping Opinion

Royal HaskoningDHV,
HoneyComb,
Edmund Street,
Liverpool,
L3 9NG.

Dyddiad/Date: 21 December 2020

Dear Ms Roe-Ely,

SCREENING AND SCOPING OPINION UNDER THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2007 (as amended)

Holyhead Waterfront Regeneration Scheme

I am writing further to your request for a Screening and Scoping Opinion, dated 25 September 2020, made in accordance with The Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended) ("The Regulations").

The purpose of the Environmental Impact Assessment (EIA) screening procedure is to determine whether the proposed works require an Environmental Impact Assessment and submission of an Environmental Statement (ES). The purpose of the scoping procedure is to determine what information should be provided in the ES.

In reaching our Screening Opinion we have considered the proposed works against Schedule A1 and A2 of the above regulations. In reaching our Scoping Opinion we have had regard to the information provided in the "Holyhead Waterfront Regeneration Scheme Environmental Scoping Report", dated 24 September 2020, and considered the requirements of Schedule 3 of the Marine Works Regulations. We have also consulted with the bodies that we consider have an interest in the project by reason of their environmental responsibilities, or local or regional competences, as required by the above regulations, and had regard to their comments.

Screening Opinion

It is our opinion that the works fall within the categories of project listed within Schedule A2, paragraphs 7, 58 and 83 of the above regulations, and therefore must be considered in terms of its size, nature and location having regard to the relevant criteria listed in Schedule 1 of the above regulations.

We have carefully considered the views of the consultation bodies alongside the criteria as set out in Schedule 1 of the regulations, and have determined, based on the information provided; that the project has the potential to have a significant effect on the environment and, therefore, a statutory EIA is required.

We have come to this conclusion on the basis of the scale and breadth of the development which include but, is not limited to the development of a 250 berth marina, breakwater, residential dwellings, and 4,040m³ of development for commercial and leisure use, as well as its proximity of the development to a number of protected sites including:

- Holy Island Coast SSSI;
- Holy Island Coast SAC;
- Holy Island Coast SPA;
- North Anglesey Marine SAC;
- Anglesey Terns SPA;
- Liverpool Bay SPA; &
- The Skerries SSSI.

Scoping Opinion

This letter sets out the additional information that we consider necessary to be included and/or assessed in the ES for this Project.

Please note our Scoping Opinion is based on the information available to us at this time. The information provided is not a definitive list of the ES / EIA requirements and further information may be required following an application for this project, to ensure a full assessment is carried out.

This Screening and Scoping Opinion will be provided to all those bodies that were consulted and will be publicised on our website and on our Public Register.

The Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended)

Scoping Opinion (SC2006)

Summary of the proposal

Royal HaskoningDHV on behalf of Conygar Holyhead Ltd., has sought a Screening and Scoping Opinion from Natural Resources Wales Permitting Service (NRW PS) for the proposed Holyhead Waterfront Regeneration Scheme on the Isle of Anglesey. The proposed development includes a new marina, the reclamation of land from the sea, new residential developments, together with commercial, leisure and retail uses and associated infrastructure, comprising:

- A 250-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;
- A 300m² Sail Training/Youth Centre;
- Public Beach area with community changing/welfare facilities;
- New maritime workshops; &
- circa 250 space overflow car park.

The aim of the proposed development is to improve and enhance Holyhead's status as a national and international tourism destination. The development is, therefore, intended to contribute to:

- the continued regeneration of Holyhead Town;
- provision of employment opportunities;
- provision of residential and leisure facilities; &
- acting as a catalyst to further investment and initiatives in the local area.

Location

The works are proposed to lie along the Holyhead seafront in the shelter of the Great Breakwater. The new marina is proposed to be surrounded by a new breakwater which extends into Holyhead Harbour.

The proposed development will be divided into four development zones as described in Section 1.2.2 and Figure 1.3 of the Holyhead Waterfront Regeneration Scheme Environmental Scoping Report (PB8908-RHD-ZZ-XX-RP-Z-0027) (hereafter, Environmental Scoping Report).

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

Consultation responses received

In considering the Environmental Scoping Report, NRW PS consulted with various consultation bodies. The consultation bodies that responded are listed below:

- Natural Resources Wales Technical Experts (NRW TE);
- The Crown Estate;
- MoD – Safeguarding Defence;
- Maritime and Coastguard Agency (MCA);
- Trinity House;
- Royal Yachting Association (RYA);
- Anglesey County Council Biodiversity Officer;
- Cadw;
- NERL Safeguarding; &
- Cefas.

0. General Comments

0.1. Marine and coastal guidance produced by NRW TE that may provide useful information to help with your project is available here:

<https://naturalresources.wales/guidance-and-advice/business-sectors/marine/marine-and-coastal-guidance/?lang=en>

0.2. As detailed in section 1 of the Environmental Scoping Report, an ES was produced for the development in 2010 and 2020, but due to changes in the design, an updated ES is required. The Environmental Scoping Report has been produced to determine the scope of the extent of supplementary/updated work required, and as such comments have been based on the Environmental Scoping Report provided.

- 0.3. NRW TE advise that comments made in NRW TE's response to the S73 application dated 13 May 2020 (Appendix D4 of the Environmental Scoping report) should be considered and addressed as part of the updated assessment.
- 0.4. We note from section 1.1. of the Environmental Scoping Report, that three consents are required to permit the construction and operation of the proposed work. As detailed within the report, we agree that all applications should be supported by a single ES.
- 0.5. No detailed response was received from the Isle of Anglesey County Council (IoACC), as they confirmed they would be providing a formal Scoping Opinion themselves under the Town and Country Planning (EIA)(Wales) Regulations 2017 (as amended) for the proposal. As a single ES is proposed, you should ensure that the ES demonstrates how it has considered all Scoping Opinions received.
- 0.6. The ES submitted should demonstrate consideration of the points raised in this Scoping Opinion. It is recommended that a table is provided in the ES summarising the Scoping Opinion comments and how they are addressed in the ES.
- 0.7. The EIA must be undertaken by a competent person and the ES must include a competent expert statement.
- 0.8. Where possible, other environmental assessments should be coordinated with the EIA process. However, it is important to note that the Habitats Regulations Assessment (HRA) and Water Framework Directive assessment (WFD), and any other assessment, are separate processes to the EIA.
- 0.9. Throughout the ES robust evidence should be presented so that the potential environmental impacts can be properly understood and evaluated; and appropriate measures identified to avoid, reduce or where necessary compensate for those impacts.
- 0.10. The ES must include:
- A Non-Technical Summary (NTS);
 - A chart or map identifying where the activity will be carried out;
 - A description of the likely significant effects of the project, whether direct, indirect, secondary, cumulative, transboundary, short-term, medium-term, long-term, permanent, temporary, positive and negative;
 - A description of the methods used to make the assessment of the significant effects and difficulties encountered in compiling the information and uncertainties involved;
 - A description of measures to avoid, prevent, reduce or offset identified significant adverse effects and proposed monitoring arrangements; &

- A description of the expected significant adverse effects of the project on the environment resulting from the vulnerability of the project to risks of major accidents or disasters.
- 0.11. The ES must consider any potential transboundary impacts where appropriate.
- 0.12. Early engagement with relevant stakeholders is encouraged. You are able to obtain further advice from NRW TE through the NRW Discretionary Advice Service, please see here: <https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/advice-for-developers/our-service-to-developers/>
- 0.13. The UK left the EU on 31 January 2020 – all legal obligations relating to compliance with environmental licences/permits and legislation will continue to apply. NRW on behalf of Welsh Ministers will continue to issue licenses in line with our current practice.

1. Project Description

1.1. The ES must include:

- Description of the nature of the project (as a whole);
- Details of each phase of the project;
- The methods to be used in the project; &
- Regulated activities.

1.2. The updated project proposal must be clearly defined. Reference is made to the “2020 Masterplan” in section 1.2.2 of the Environmental Scoping Report, however, it is unclear from sections 1.2.1 and 1.2.2 what the updated proposal consists of.

1.3. The report lacks information on the design of the breakwater. It is also unclear whether the changes proposed will include changes to its design. More information regarding this is, therefore, required for the ES.

1.4. Clarity on the intended sequence of activities should be provided in the ES. For example, in section 3.2.2.5 of the Environmental Scoping Report under “Marina Installation”, it is noted that the restraining piles would be within the enclosed space created by the outer breakwater however, it is unclear if the drilling is planned to be undertaken before boring.

1.5. The source of the sand material to be used for the breakwater must be identified in the ES.

- 1.6. Any requirement for post-construction maintenance dredging must be confirmed in the EIA/ES. If required, an assessment should be made to consider the quantities and frequency, as well as preferred disposal options (this should include but, is not limited to the potential for alternative and beneficial use).

2. Policy and Legislation

- 2.1. You must ensure that reference is made to and consideration of compliance with the UK Marine Policy Statement and the Welsh National Marine Plan and its associated policies within the submitted ES, alongside any further regional planning documentation.

The Welsh National Marine Plan can be found here:

<https://gov.wales/welsh-national-marine-plan-document>.

Implementation guidance for the Welsh National Marine Plan can also be found here:

<https://gov.wales/welsh-national-marine-plan-implementation-guidance>.

3. Scoping of Environmental Effects

- 3.1. No comments were received from consultees in relation to the following sections of the Environmental Scoping Report. The ES should include an assessment of the impacts as set out in the Environmental Scoping Report:

- Traffic and Transportation;
- Air Quality;
- Landscape, seascape and visual effects;
- Commercial and recreational fisheries;
- Ground and Geo-environmental Conditions;
- Socio-economic effects;
- Climate change;
- Population and Human Health; &
- Accidents and Disasters.

3.2. Hydrodynamics, Sedimentation and Wave Climate

- 3.2.1. Section 1.5 of the Environmental Scoping Report describes the study area as 2km which will be informed by the modelling undertaken as described in section 5.1.4. As this area intersects the beach at Penrhos, and given the pocket beach nature of the coastline round North Anglesey, it is recommended that the study area be extended to the East to the headland at Penrhos, as a minimum and potentially further if the modelling shows this to be needed.

- 3.2.2. It is unclear if there are any changes to the design structure of the breakwater. The ES will need to fully assess any impacts and/or changes on hydrodynamics and sediment movement as a result of any design variation to the breakwater and any subsequent effects on ecological interest over the construction, operation and decommissioning timescales.
- 3.2.3. We find the approach proposed to provide further information to inform the existing baseline, sedimentation and wave climate baseline in section 5.1.4 to be appropriate with regards to dredging and disposals.

3.3. Ecology and Nature Conservation

3.3.1. Terrestrial Ecology

- 3.3.1.1. No comments were received from consultees in relation to terrestrial ecology. The ES should include an assessment of the impacts as set out in the Environmental Scoping Report.

3.3.2. Intertidal and Benthic Ecology

- 3.3.2.1. It is unclear whether the changes proposed to the breakwater will include changes to its design. We advise that any changes to the breakwater design will need to be adequately assessed. NRW TE consider that loss of habitat within the footprint of the breakwater will need to be considered as permanent habitat loss.
- 3.3.2.2. We agree that the additional key issues identified in Section 5.5.2.3 of the Environmental Scoping Report, the ES must contain an assessment of impacts as set out in section 5.5.2.4.
- 3.3.2.3. NRW TE welcome the approach outlined in section 4.2 of the Environmental Scoping Report regarding intertidal walkover and subtidal video transect surveys and we would encourage you to engage with NRW TE in order to develop a survey design fit for purpose.
- 3.3.2.4. NRW TE advise 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 where appropriate, in order to help mitigate the loss of this habitat. NRW TE also advise that such measures may take the form of biodiversity enhancement measures associated to the construction of the artificial marina and land reclamation waterfront development area as provided by NRW TE in section 4.4 of Appendix D4 of the Environmental Scoping

Report. We would advise further engagement with NRW TE around appropriate mitigation measures.

3.3.2.5. We agree with the proposal to submit a biosecurity risk assessment which will consider INNS mitigations as per section 5.5.2.4 of the Environmental Scoping Report. This information should be included within or as an appendix to the ES.

3.3.3. **Ornithology**

3.3.3.1. We agree with the additional key issue identified in section 5.5.3.3 of the Environmental Scoping Report and the direct and in-direct effects of dredging activities on the SPAs must be fully assessed in the ES, and any necessary mitigation measures identified.

3.3.4. **Fish and Shellfish Resources**

3.3.4.1. We welcome the inclusion of consideration of fish and shellfish within the EIA as stated in Section 5.5.4 of the Environmental Scoping Report.

3.3.4.2. We do not agree that the effects of the disposal of dredged material upon fish and shellfish can be scoped out at this stage. This will be dependent on the results of the sediment testing conducted, and whether it determines that the material is suitable for disposal at Holyhead North (IS043) disposal ground.

3.3.4.3. If there are any residual concerns on the disposal of dredged material due to the results of the sediment testing conducted, then further assessment of the effects of its disposal upon fish and shellfish may be required.

3.3.4.4. We would advise that you engage with NRW TE to agree a list of species to be assessed by the EIA as fish and shellfish receptors, to ensure that all the necessary species are assessed, and to confirm whether any further assessment proposed following results of sediment analysis.

3.3.4.5. In addition to the impact pathways identified in Section 5.5.4.2, it is advised that the following effects are all also considered during the EIA for fish and shellfish receptors:

- Noise, vibration and light disturbance during all construction activities;
- Entrainment, injury and mortality during dredging activities;
- Smothering during dredging activities;
- Direct loss of habitat from land reclamation and dredging activities (in addition to indirect habitat alteration as a result of changes to hydrodynamic and sedimentary processes already scoped in); &

- Assessment of the above impact pathways will inform the assessment of effects upon commercial and recreational fisheries in the area.

3.3.5. **Marine mammals**

- 3.3.5.1. An updated noise assessment must be provided as described in section 5.9 and 5.9.4 of the Environmental Scoping Report this should ensure that the noise assessments are recalculated to reflect the updated project description. We agree with the proposed approach to provide required additional information set out in section 5.5.5.4 and this must be carried out as part of the EIA.

3.4. **Water Quality, Surface Waters and Flood Risk**

- 3.4.1. We note that reference is made in section 4.3 of the Environmental Scoping Report to sediment sample plan SP2003. We advise you contact us in order to confirm that the sample plan is still suitable, if there have been any changes made to the proposed development. The Marine Licensing Team can be contacted via the following email address: marinelicensing@cyfoethnaturiolcymru.gov.uk
- 3.4.2. As stated in Section 5.8.4 of the Environmental Scoping Report, we consider that the results of the sediment sampling must be used to assess impacts on water and sediment quality. NRW TE also advise that it will be necessary to consider this information in the context of potential effects on biota.
- 3.4.3. The results of the sediment sampling described in section 4.3 of the Environmental Scoping Report should be submitted in the NRW results template and provided in support of your application.
- 3.4.4. The effects of dredging and dredge disposal on marine water quality must be fully assessed in the ES, and any necessary mitigation measures identified. This information should also inform the revised WFD compliance assessment.
- 3.4.5. It is recommended that a detailed assessment is provided that shows how the disposal site(s) can accommodate the dredged material including physical and chemical characteristics, as well as including any ongoing maintenance dredge arising information. This should also include an assessment of the fate of the material.
- 3.4.6. Section 3.2.2.5 of the Environmental Scoping Report considers the Holyhead North site (IS043) as a potential disposal ground for capital dredge arisings. Currently, Holyhead North is known to be effective at dispersing non-consolidated fines, however, it will need a specific environmental assessment if a sediment of a different composition is required to be disposed of.
- 3.4.7. In addition, the capacity of Holyhead North will also need to be considered in

relation to other projects and pressures within the area, as identified in the cumulative assessment section 6.2 of the Environmental Scoping Report.

- 3.4.8. We advise that the comments made in relation to marine water quality and WFD raised in Annex 1 of the NRW TE response to the S73 Application dated 13 May 2020 are fully considered and addressed as part of any updated ES.

3.5. Noise and Vibration

- 3.5.1. We are satisfied with the description of how impacts via noise will be re-assessed in section 5.9.4.
- 3.5.2. We do not agree that the effects of noise and vibration on fish and shellfish can be scoped out at this stage, as details of the construction phase are not yet known.
- 3.5.3. We agree with the proposal to undertake a desk review of noise impact levels from the proposed activities and increased vessel numbers, and advise that this is undertaken once details of the proposed construction phase and sequence of activities are better known.

3.6. Commercial and Recreational Navigation

- 3.6.1. The impact on commercial and recreational navigation must be assessed and presented within the ES.
- 3.6.2. Mitigation measures should be fully considered as part of the Navigational Study including, any requirements for aids to navigation.
- 3.6.3. A Navigation Risk Assessment should be carried out to support the assessment. We encourage you to engage with Trinity House, Maritime and Coastguard Agency as well as the Local Harbour Master in carrying out your assessment. This must include a preliminary assessment the potential impacts to Search and Rescue (SAR) and emergency response in the area to ensure there are no impacts on SAR operations.
- 3.6.4. The MCA has recommended that a Safety Management System for the project is considered in line with the Port Marine Safety Code (PMSC) and its Guide to Good Practice, notably section 7 “Conservancy” and sub-section 7.8 “Regulating harbour works”.

3.7. Archaeology and Heritage

- 3.7.1. Cadw’s records show that the following historic assets are potentially affected by the proposal:

Scheduled Ancient Monuments

- AN019 Caer y Twr

Listed Buildings:

- 5743 HOLYHEAD BREAKWATER, SOLDIER'S POINT II*
- 5744 LIGHTHOUSE ON HOLYHEAD BREAKWATER II
- 5771 CUSTOMS HOUSE, SALT ISLAND II
- 5772 HARBOUR OFFICE, SALT ISLAND II*
- 5773 GEORGE IV ARCH, SALT ISLAND II*
- 14729 ZODIAC RESTAURANT, BEACH ROAD (N SIDE) II
- 14730 TRINITY HOUSE OFFICE, BEACH ROAD (N SIDE) II
- 14731 TRINITY YARD LARGE WORKSHOP, BEACH ROAD (N SIDE) II
- 14732 TRINITY YARD SMALL WORKSHOP, BEACH ROAD (N SIDE) II
- 14755 GUNPOWDER MAGAZINE, BREAKWATER QUARRY II
- 14759 PORTHYFELIN HOUSE, SOLDIER'S POINT II
- 14760 SOLDIER'S POINT HOUSE, SOLDIER'S POINT II
- 14761 SCREEN WALL TO SOLDIER'S POINT HOUSE, SOLDIER'S POINT II

Conservation Areas:

- Holyhead Beach

3.7.2. We agree with the scope of the assessment outlined in Section 5.11 of the Environmental Scoping Report, although we consider that the archaeological remains and built heritage study area proposed in section 5.11.3 should be increased to 3 km, to include the assets identified above.

3.7.3. The EIA must consider all heritage assets that will be affected by the proposed development in this zone and an initial list of these assets have been provided by Cadw above. The impact of the proposed works on the settings of these designated heritage assets must be assessed in accordance with the Welsh Government guidance given in the document "The Setting of Historic Assets in Wales".

3.7.4. We consider the sources given in the Environmental Scoping Report that will be searched are appropriate. The results of the searches should be assessed in accordance with the Standard and Guidance for Desk-based Heritage Assessment set by the Chartered Institute for Archaeologists.

3.7.5. If dive surveys and/or seabed geophysical surveys are undertaken, they

should also be carried out in accordance with the relevant standard and guidance set by the Chartered Institute for Archaeologists.

4. Cumulative Impact Assessment

4.1. Both NRW TE and Cefas consider that the projects listed in section 6.2 of the Environmental Scoping Report are appropriate for the cumulative assessment.

4.2. The ES must include an assessment of cumulative and in-combination effects. There are many projects either approved or being developed at present and, therefore, caution will be needed with any in-combination assessment and baseline chosen.

4.3. The following data sources may provide useful information on other projects for the assessment of cumulative effects:

- The Nationally Significant Infrastructure Projects register:
<https://infrastructure.planninginspectorate.gov.uk/projects/register-of-applications/>
- The Developments of National Significance Register:
<http://gov.wales/docs/desh/publications/180312-dns-register-en.pdf>
- Planning Policy e.g. Local Development Plans, Transport Plans (National and Local) and National Policy Statements.
- An up to date list of marine licensable developments can be found at the following link:
<http://lle.gov.wales/catalogue/item/MarineLicences>

4.4. The EIA/ES should consider in combination impacts from within the project, for example, increased suspended sediment in the water column from dredging, sediment movement, drilling/boring and construction of the breakwater. These should also be considered in combination with other activities, such as underwater noise from piling on biological receptors such as fisheries.

4.5. The EIA/ES must include an assessment of the cumulative impacts from the disposal of dredged materials to the preferred disposal site(s).

5. Habitats Regulations Assessment (HRA)

5.1. The HRA assessment should draw upon the assessments and information provided in the wider EIA, where there are common topic areas.

6. Water Framework Directive (WFD)

6.1. The WFD assessment should draw upon the assessments and information provided in the wider EIA, where there are common topic a

Yours sincerely



Graham Willis
Senior Permitting Officer
Marine Licensing Team
Natural Resources Wales

Cc: All Consultation Bodies

Approved by:



Wendy Dodds
Marine Licensing Team Leader

Natural Resources Wales
Cc: Consultation Bodies.

A3 Welsh Government / PINS Scoping Opinion



The Planning Inspectorate
Yr Arolygiaeth Gynllunio

HRO: EIA Scoping Opinion

3260134: Holyhead Waterfront Regeneration

08/01/2021

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This Scoping Opinion is provided on the basis of the information submitted to the Planning Inspectorate on 24 September 2020, in addition to consultation responses received. The advice does not prejudice any recommendation made by an Inspector or any decision made by the Welsh Ministers in relation to the development, and does not preclude the Inspector from subsequently requiring further information to be submitted with the submitted Harbour Revision Order under Schedule 3 of the Harbours Act 1964 (as amended) ("The 1964 Act").

1. Introduction and Screening Decision

The Planning Inspectorate ("the Inspectorate") received notice under paragraph 3 of Schedule 3 to the 1964 Act that the applicant intends to make an application for a Harbour Revision Order in relation to a Waterfront Regeneration Scheme by Conygar Holyhead Ltd. The site of the proposed development is located on Holy Island (Ynys Gybi) within Holyhead New Harbour within the planning authority of Isle of Anglesey County Council (IoACC). In accordance with paragraph 6(2) of Schedule 3, the Welsh Ministers must decide whether the project requires an environmental impact assessment (EIA) and inform the Applicant in writing of the decision and the reasons behind it with reference to the selection criteria. In accordance with the 1964 Act, the scheme has been considered against [Directive 2011/92/EU](#) ('the Directive').

The project falls within category 10- Infrastructure projects (b) (urban development projects) and (e) (constructions of harbours not included in Annex I of the Directive) of Annex II of the Directive for which EIA may be required. The project has been considered against the criteria listed at Annex III of the Directive.

The Proposed Development is of a size and complexity likely to generate significant effects, it will have a cumulation of effects with other existing and approved project (Holyhead Port) and will use natural resources in particular land, water and is likely to have impacts on biodiversity. It is located within and adjacent to environmentally sensitive sites such as coastal zones and areas classified or protected under national legislation such as the National Site Network and on designated sensitive landscape area. The nature, magnitude, intensity and probability of the potential impacts generate by the Proposed Development are likely to be significant on the identified environmentally sensitive sites.

On behalf of the Welsh Ministers, it is hereby confirmed that the project described in the submitted Scoping Report and appendices requires an environmental impact assessment.

In accordance with paragraph 6(3) of Schedule 3, the Welsh Ministers must give the proposed applicant an opinion in writing about the scope and level of information to be provided in the Environmental Statement (ES). This document forms that 'Scoping Opinion'

The applicant has identified that 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).

The Applicant specifies in the Scoping Report (SR) that three applications would be supported by one, all-encompassing Environmental Statement (ES), under the relevant EIA legislation.

A copy of the Scoping Report (SR) has therefore been submitted to the Planning Inspectorate (The Inspectorate) acting on behalf of the WG, NRW and the IoACC.

While the Applicant refers to the Harbour Works (Environmental Impact Assessment) Regulations 1999 in the SR, part 2 of those regulations was revoked by Regulation 29 of The Marine Works (Environmental Impact Assessment) Regulations 2007. It is my understanding that the provision for the Welsh Ministers to issue a Scoping Opinion is contained within Schedule 3 to the Harbours Act 1964.

This Scoping Opinion has taken into account the requirements of the 1964 Act as well as current best practice towards preparation of an ES. The Inspectorate notes that the requirements of the 1964 Act differ from the Marine Works (EIA) Regulations 2007 and the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 thus any future ES should include all the requirements specified by the 1964 Act. The Inspectorate has consulted on the SR and the responses received from the consultation bodies have been taken into account in adopting this Opinion.

Information requested by this scoping opinion without specific reference to paragraphs 8(3)(a)-(e) of Schedule 3 is to be taken as being required under paragraph 8(3)(f) of that Schedule, in that it constitutes additional information specified in Annex IV to the EIA Directive that is relevant to the specific characteristics of the project or type of project and to the environmental features likely to be affected. This information is required to ensure that a reasoned conclusion on the EIA can be reached for the purposes of paragraph 18A(4) of Schedule 3 and to avoid the need for the Welsh Ministers to direct that such information be supplied under paragraph 8A at a later stage.

The Inspectorate is authorised to issue this Scoping Opinion on behalf of the Welsh Ministers.

2. Site Description

The works are proposed to lie along the Holyhead seafront in the shelter of the Great Breakwater. The new marina is proposed to be surrounded by a new breakwater which extends into Holyhead Harbour.

3. Proposed Development

The proposed development includes a new marina, the reclamation of land from the sea, new residential developments, together with commercial, leisure and retail uses and associated infrastructure, comprising:

- A 250-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;
- 4,040 m² of commercial / leisure uses;
- A 300 m² Sail Training / Youth Centre;
- Public Beach area with community changing / welfare facilities;
- New maritime workshops; &
- circa 250 space overflow car park.

The Proposed Development has been divided into four distinct 'development zones':

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

The proposal is shown on Figure 1.2 and 1.3 of the SR.

4. History

An Environmental Statement (ES) for the Proposed Development was submitted to the IoACC in 2010 in support of an Outline Planning Application (with All Matters Reserved). The Proposed Development was granted Outline Planning Permission, subject to a number of planning conditions, by the IoACC in 2014 (ref.19C1046A/EIA/ECON) which required the submission of Reserved Matters applications by a certain date which has now lapsed.

Consequently, an application under Section 73 of the Town and Country Planning Act 1990 (as amended) (s73) was submitted to the IoACC in March 2020 (ref. VAR/2020/20/EIA) in order to extend the period of time within which Reserved Matters applications could be submitted and also extend the time period for the development being implemented.

An ES (the '2020 ES') 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 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 would need to be sought.

5. Consultation

Formal consultation was undertaken with the following bodies:

- Relevant Local Planning Authority (IoACC)
- Natural Resources Wales (NRW)
- Cadw
- Gwynedd Archaeological Planning Service
- Marine and Coastguard Agency (MCA)
- Trinity House
- Health and Safety Executive (HSE)
- Defence Infrastructure Organisation (DIO)
- Crown Estate

Responses received are included in **Appendix 1**.

6. Environmental Impact Assessment Approach

The Applicants should satisfy themselves that the ES includes all the information outlined in Paragraph 8 of Schedule 3 to the 1964 Act. In addition, the Applicant should ensure that the Non-Technical Summary includes a summary of all the information included in Paragraph 8(3). Consider a structure that allows the author of the ES and the appointed Inspector and Decision Maker to readily satisfy themselves that the ES contains all the information specified in Paragraph 8 of Schedule 3 to the 1964 Act and required by this scoping opinion. Cross refer to the requirements in the relevant sections of the ES and include a summary after the Contents page that lays out all the requirements from the Regulations and what sections of the ES they are fulfilled by.

As the assessments are made, consideration should be given to whether standalone topic chapters would be necessary for topics that are currently proposed to be considered as part of other chapters, particularly if it is apparent that there are significant effects and a large amount of information for a particular topic.

The applicant's proposed scope for the ES is based on the production of a range of other assessments and information to be provided as part of the application submission rather than the ES. The Inspectorate agrees with this approach where appropriate. The developer is encouraged to liaise with key consultees regarding non-ES application documents which are not a legislative requirement.

The ES should focus on describing and quantifying significant environmental effects. Other matters relevant to the application should be addressed in separate documents.

6.1 Reasonable Alternatives

In line with the requirements of paragraph 8(3)(d) of Schedule 3 to the 1964 Act, any reasonable alternatives studied by the Applicant should be presented in the ES. The reasons behind the selection of the chosen option should also be provided in the ES, including where environmental effects have informed the choices made.

It is worth bearing in mind that under the [Conservation of Habitats and Species Regulations 2017](#) ("the Habitats Regulations") as amended, unless it can be clearly shown to the Welsh Ministers that the project would have no adverse effect on the integrity of any designated sites, it would have to be shown that there is no feasible alternative solution (see advice note from [IEMA](#)). Further advice regarding the Habitats Regulations is provided in the final chapter of this Scoping Direction.

6.2 Currency of Environmental Information

For all environmental aspects, the applicant should ensure that any survey data is as up to date as possible and clearly set out in the ES the timing and nature of the data on which the assessment has been based. Any study area applied to the assessments should be clearly defined. The impacts of construction, operation and decommissioning activities should be considered as part of the assessment where these could give rise to significant environmental effects. Consideration should be given to relevant legislation, policies, and applicable best practice guidance documents throughout the ES.

The ES should include a chapter setting out the overarching methodology for the assessment, which clearly distinguishes effects that are 'significant' from 'non-significant' effects. Any departure from that methodology should be described in individual aspect assessment chapters. Where professional judgement has been applied this should be clearly stated.

The ES topic chapters should report on any data limitations, key assumptions and difficulties encountered in establishing the baseline environment and undertaking the assessment of environmental effects.

6.3 Cumulative Effects

The SR recognises the importance of including cumulative effects in the scope of the ES, and of liaising with the relevant LPA in identifying schemes to be considered.

Based on the information set out in the SR, the approach to the assessment of cumulative impact is considered largely appropriate. The proposed 2 km radius for the impact of proposal on terrestrial environmental should be informed by the results of the landscape and visual assessment, in particular the Zone of Theoretical Visibility (ZTV).

Effects deemed individually not significant from the assessment could cumulatively be significant, so inclusion criteria based on the most likely significant effects from this type of development may prove helpful when identifying what other developments should be accounted for. The criteria may vary from topic to topic.

Best practice is to include proportionate information relating to projects that are not yet consented, dependent on the level of certainty of them coming forward.

All of the other developments considered should be documented and the reasons for inclusion or exclusion should be clearly stated. Professional judgement should be used to avoid excluding other development that is close to threshold limits but has characteristics likely to give rise to a significant effect; or could give rise to a cumulative effect by virtue of its proximity to the proposed development. Similarly, professional judgement should be applied to other development that exceeds thresholds but may not give rise to discernible effects. The process of refinement should be undertaken in consultation with the LPA, NRW and other consultees, where appropriate.

The scope of the cumulative assessment should be fully explained and justified in the ES.

The Planning Inspectorate's guidance for Nationally Significant Infrastructure Projects – [Advice Note 17: Cumulative Effects Assessment](#) sets out a staged process for assessing cumulative impacts that may be of relevance to the Applicant.

6.4 Mitigation

Any mitigation relied upon for the purposes of the assessment should be explained in detail within the ES. The likely efficacy of the mitigation proposed should be explained with reference to residual effects. The ES should provide reference to how the delivery of measures proposed to prevent/ minimise adverse effects is secured (through legal requirements or other suitably robust methods) and whether relevant consultees agree on the adequacy of the measures proposed.

6.5 Transboundary Effects

Where an Application for a HRO requires EIA and it comes to the attention of the Welsh Government that the project is likely to have significant effects on a EEA State, the Welsh Government has a duty to consult the EEA State concerned about the project's significant effects and the measures envisaged to reduce or eliminate such effects, in accordance with paragraph 16(5)(a) of Schedule 3 to the 1964 Act.

There is the potential for this project to have an effect on navigation routes from the Republic of Ireland due to the proximity of the Site to Holyhead Port. At this stage there is not enough information to exclude a likely significant effect. Therefore, a description of the transboundary effects is required to be provided in the ES. The ES should address this matter as appropriate. Depending on the results of the Risk of Navigation Assessment, the Applicant should consider consulting the relevant authority in the Republic of Ireland.

7. Environmental Impact Assessment: Aspects of the Environment

This section contains the Inspectorate's specific comments on the scope and level of detail of information to be provided in the Applicant's ES. Environmental topics or features are not scoped out unless specifically addressed and justified by the Applicant and confirmed as being scoped out by the Inspectorate. The ES should be based on this Scoping Opinion in so far as the Proposed Development remains materially the same as the Proposed Development described in the Applicant's Scoping Report.

The Inspectorate has set out in this Opinion where it has / has not agreed to scope out matters on the basis of the information available at this time. The Inspectorate is content that the receipt of a Scoping Opinion should not prevent the Applicant from subsequently agreeing with the relevant consultees to scope such matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that

the matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.

Should the applicant wish to, due to a material change in circumstances after this Scoping Opinion has been finalised, it is open to them to submit a request for an updated Scoping Opinion. If the development itself materially changes, a fresh Scoping Opinion should be sought.

It is noted that IoACC has not responded to the consultation. However, it is stated in the SR that the Applicant has submitted a separate request for a Scoping Opinion to the LPA.

7.1 Aspects Scoped In

The following aspects of the environment are scoped in:

Hydrodynamics, sedimentation and wave climate;

Traffic and Transport;

Air Quality;

Landscape, Seascape and Visual Effects;

Ecology and Nature Conservation including terrestrial ecology, ornithology, fish and shellfish resources and marine mammals;

Commercial and recreational fisheries (to be included in other aspects' assessments as per comments at Table 1);

Ground and Geo-environmental conditions;

Water quality, surface waters and flood risk;

Noise and Vibrations;

Commercial and recreational navigation;

Archaeology and cultural heritage;

Socio-economic effects;

Climate Change, and

Public and Human Health.

8. Table 1: The Planning Inspectorate's Comments

ID	Reference in Scoping Report	Issue	Comment
	Description of the Proposed Development		
ID.1	Section 3.1	Design of the Marina	The Applicant's attention is drawn to the Maritime & Coastguard Agency's (MCA) comments at Appendix 1 regarding design and safety. The Applicant should liaise with the MCA and the Statutory Harbour Authority regarding design good practices and the development of a Safety Management System (SMS). The Inspectorate recommends that a draft SMS or at the very least an agreement between the parties that a robust SMS is achievable is agreed ahead of the submission and presented as part of the application.
ID.2	3.2.2.1	Delivery of construction material	The SR states that there are currently three options under consideration for the delivery of construction material. The three options are likely to generate different impacts when considering different environmental aspects. As such the ES may need to include different worst-case scenarios based on the options listed at paragraph 3.2.2.1, unless at the time of submission only one option is presented. Each aspect considered in the ES should state clearly the worst-case scenario used in the impact assessment assumptions.
ID.3	3.2.2.2	Construction of the new Breakwater	Similarly to comment ID.2, the SR presents different options for the construction of the new Breakwater. Each option will generate different impact and as such the worst-case scenarios should be clearly identified in the assessment of the relevant aspects.
ID.4	Section 3.3	Description of the Development	The SR does not include details of the new breakwater and the new floating breakwater. The ES should include cross sections showing the details of the breakwaters and final levels. These details should be used consistently in the assessment of the relevant aspects, including landscape and visual impact and navigation.

ID	Reference in Scoping Report	Issue	Comment
	Hydrodynamics, Sedimentation and Wave Climate		
ID.5	5.1.4	Dredging	It is noted that additional work will be required to determine whether dredging is needed. Any dredging will have implication on many aspects such as hydrodynamics, sedimentation, biodiversity and emissions. Therefore, if dredging is required, the ES should include details of footprint, consideration of the changes to tidal regime and sedimentation, and the interdependence of effects. The disposal of the dredge material should also be considered, and information provided to ensure that any potential contaminated material is handled in accordance with the relevant legislative requirements.
	Traffic and Transport		
ID.6	5.1.2	Scope of new surveys	The proposed scope is acceptable. The Inspectorate cannot comment on the junctions selected for the survey. The area to be surveyed will need to be agreed with the LPA.
	Air Quality		
ID.7	5.3.2	Principal effects considered	The SR states that the Air Quality chapter will consider traffic emissions generated by the proposal. Construction traffic emissions should also be considered, including potential effects on ecologically sensitive receptors.
	Landscape – Seascape and Visual effects		
ID.8	Table 5.2	Viewpoints	The Inspectorate notes that the viewpoints were agreed with the LPA and NRW in January 2020. Based on the confirmation received from NRW (Appendix 1) the Inspectorate has no further comments.
	Terrestrial Ecology		
ID.9	5.5.1.4	Survey data	The SR states that the ecological survey data are less than 18 months and likely to be valid. It is noted that surveys were conducted in 2019 and thus they may be more than two years old by the time the application is

ID	Reference in Scoping Report	Issue	Comment
			submitted. The Applicant should consider whether updated surveys information should be provided to support the application to avoid delays in the determination.
ID.10	5.5.1.4	The Greens	The SR states that the area named the Greens was not included in the 2019 Phase 1 Habitat survey. It should be included even if considered of low ecological value.
	Intertidal and Benthic Ecology		
ID.11	5.5.2	Survey and assessment	Comments from NRW are provided at Appendix 1. The Inspectorate agrees with NRW and has no further comments.
	Ornithology		
ID.12	5.5.3.4	Approach	The SR states that a breeding bird survey was undertaken in 2009 and a wintering bird survey was undertaken in 2016. No additional information is provided in the SR to confirm whether updated surveys were conducted since. The SR identifies new issues emerging since the submission of the 2020 ES. The SR states that a desk-based review of the baseline information provided in the 2020 ES will be undertaken to determine the impact on coastal and marine birds generated by dredging and disposal operations. The Inspectorate notes that NRW agrees with this approach. However, the surveys appear to be out of date and the Inspectorate question whether the baselines provided are sufficient to ensure that the assessment is robust. The Inspectorate cannot agree at this stage that a desk-based review of existing out of date information is enough to support the assessment. Therefore, the Applicant should agree with NRW that no updated surveys are required before the submission of the application. If this agreement cannot be reached, the ornithological surveys should be updated.

ID	Reference in Scoping Report	Issue	Comment
	Fish and shellfish resources		
ID.13	5.5.4.3	Approach	Comments from NRW are provided at Appendix 1. The Inspectorate agrees with NRW and has no further comments
	Marine Mammals		
ID.14	5.5.5.4	Approach	Comments from NRW are provided at Appendix 1. The Inspectorate agrees with NRW and has no further comments
	Ground and Geo-Environmental Conditions		
ID.15	5.7	Approach	Comments from NRW are provided at Appendix 1. The Inspectorate agrees with NRW and has no further comments.
	Water Quality and Flood Risk		
ID.16	5.8.4	Approach	The proposed scope is acceptable. The Inspectorate has no further comments.
	Noise and Vibration		
ID.17	5.9.4	Approach	The proposed scope is acceptable. However, if dredging is required during construction, this should be included in the assessment, including disposal.
	Commercial and Recreational Navigation		
ID.18	5.10.4	Approach	The Inspectorate notes that a Navigation Risk assessment will be undertaken. The Applicant attention is drawn to comments received from MCA and Trinity House. The Applicant should consult the relevant bodies in the preparation of the Navigation Risk Assessment and also consider the potential for transboundary effects, as previously discussed in this Scoping Opinion.

ID	Reference in Scoping Report	Issue	Comment
	Archaeology and Heritage		
ID.19	5.11.4	Approach	The Applicant's attention is drawn to comments received from Cadw and Gwynedd Archaeological Planning Service at Appendix 1.
	Socio-economic effects		
ID.20	5.12.4	Approach	The proposed scope is acceptable. The Inspectorate has no further comments.
	Climate Change		
ID.21	5.13.4	Approach	The proposed scope is acceptable. The Inspectorate has no further comments
	Applicant's proposed Aspects to be scoped out		
ID.22	5.6.4	Commercial and Recreational Fisheries	The SR states that the impact on commercial navigation and shellfish resources will be covered by different chapters, thus the applicant is proposing to scope the impact on commercial and recreational fisheries out. However, it is noted that neither the scope of the fish and shellfish resources assessment (Section 5.5.4) or the scope of the commercial and recreational fisheries (Section 5.10) includes considerations of the impacts on commercial and recreational fishing activities / landings within the New Harbour due to impacts on fish stocks during the construction works and during operations. This should be considered as part of the assessment, including in the socio-economic assessment, and thus it cannot be scoped out of the ES but does not necessarily require a dedicated chapter.
ID.23	5.14.4	Population and human health	The scope of the assessment included in the different chapters listed in the SR is considered acceptable and therefore the Inspectorate agrees that a dedicated chapter will not be required.
ID.24	5.13.3	Accidents and Major disaster	The scope of the assessment included in the different chapters listed in the SR is considered acceptable and therefore the Inspectorate agrees that a dedicated chapter will not be required.

9. Other Matters

This section does not constitute part of the Scoping Direction, but addresses other issues related to the proposal.

9.1 Habitats Regulation Assessment

[The Conservation of Habitats and Species Regulations 2017 \(as amended in 2019\)](#) require competent authorities, before granting consent for a plan or project, to carry out an appropriate assessment (AA) in circumstances where the plan or project is likely to have a significant effect on an important protected site part of the National Site Network (either alone or in combination with other plans or projects). The competent authority in respect of the HRO application is the relevant Welsh Minister who makes the final decision. It is the Applicant's responsibility to provide sufficient information to the competent authority to enable them to carry out an AA or determine whether an AA is required.

When considering whether or not significant effects are likely, applicants should ensure that their rationale is consistent with the [CJEU finding](#) that mitigation measures (referred to in the judgment as measures which are intended to avoid or reduce effects) should be assessed within the framework of an AA and that it is not permissible to take account of measures intended to avoid or reduce the harmful effects of the plan or project on a European site when determining whether an AA is required ('screening'). The screening stage must be undertaken on a precautionary basis without regard to any proposed integrated or additional avoidance or reduction measures. Where the likelihood of significant effects cannot be excluded, on the basis of objective information the competent authority must proceed to carry out an AA to establish whether the plan or project will affect the integrity of the protected site, which can include at that stage consideration of the effectiveness of the proposed avoidance or reduction measures.

Where it is effective to cross refer to sections of the ES in the HRA, a clear and consistent approach should be adopted.

The Planning Inspectorate's guidance for Nationally Significant Infrastructure Projects – [Advice Note 10: Habitat Regulations Assessment relevant to Nationally Significant Infrastructure Projects](#) may prove useful when considering what information to provide to allow the Welsh Ministers to undertake AA.

The Planning Inspectorate notes the intention to submit a shadow HRA considering the Likely significant impacts on:

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

The Applicant is reminded that a Stage 1 screening exercise should also be conducted taking into consideration potential impacts from the development on all conservation objectives of the identified designated sites, both alone and in combination.

9.2 SuDS Consent

Whilst a separate legislative requirement from the HRO, the Applicant's attention is drawn to the statutory SuDS regime that came into force in Wales in January 2019. The requirement to obtain SuDS consent prior to construction may require iterative design changes that influence the scheme that is to be assessed within the ES and taken through to application. As such, it is recommended that the applicant contact the local SuDS Approval Body early on.

9.3 The National Development Framework (Future Wales: the national plan 2040)

The 1964 Act does not include specific requirements to consider planning policy in the submission. However, these considerations are part of the Planning Application to be submitted to IoACC under the terms of the Town and Country Planning Act 1990. Therefore, the Applicant may wish to address [the NDF](#) in their planning statement. The NDF is due to be [finalised in February 2021](#).

Appendix: Consultation Responses



27th November 2020

Our Ref: 1127je/D1333.01

Giulia Bazzoni
Planning Officer
Planning & Environment Team
The Planning Inspectorate
Crown Building
Cathays Park
Cardiff
CF10 3NQ

Dear Giulia,

**Holyhead Waterfront Regeneration
Scoping Consultation**

Thank you for consulting us on the above scoping consultation. The proposed scope and methodology for assessment relating to archaeology and cultural heritage (as described under section 5.11 of the scoping report) appears generally appropriate, but I would make the following comments:

The Environmental Statement chapter will need to consider the direct and indirect impacts upon the historic buildings proposed to be renovated and converted as part of the scheme. This is not identified as a key issue in the scoping report (5.11.3) but is likely to be one of the main concerns (or benefits) of the proposals, and has altered from the originally presented scheme.

Section 5.11.4 sets out the standard scope that would be expected for a comprehensive desk-based assessment. With the exception of Historic Environment Record (HER) information and results of the ground investigation works completed in 2019, it is likely that the majority of the desk-based background can be drawn from the sources used for the 2020 Environmental Statement, as these are unlikely to have changed. We would however advise that a site visit should be made to note any changes to assets within the new development area, particular in relation to the condition of upstanding structures and observation of any recent development or groundworks.

The proposed methodology for obtaining additional information on marine and maritime archaeology appears appropriate, but we would advise that specialist advice on this aspect should be obtained from the maritime officer of the RCAHMS (noting that this post is currently being advertised).

I trust the above is helpful, but please do not hesitate to be in touch with any queries.

Yours sincerely

Jenny Emmett
Senior Planning Archaeologist

Cadeirydd/Chair - David Elis-Williams MA(Oxon), MSc, CPFA

Prif Archaeolegydd/Chief Archaeologist - Andrew Davidson, B.A., F.S.A., MCiA

Mae Ymddiriedolaeth Archaeolegol Gwynedd yn Gwmni Cyfyngedig (Ref Cof. 1180515) ac yn Elusen (Rhif Cof. 508849)
Gwynedd Archaeological Trust is both a Limited Company (Reg No. 1180515) and a Charity (Reg No. 508849)



From: [REDACTED]
To: dns.wales
Subject: 3260134 – Holyhead Waterfront Regeneration HRO – Scoping Consultation response
Date: 22 October 2020 08:38:50

Dear Giulia,

Thank you for the opportunity to comment on this scoping consultation. We have no comment to make.

Regards,
Mark

Mark Wrigley | Asset Manager

M: [REDACTED] [REDACTED]

The Crown Estate



1 St James's Market, London, SW1Y 4AH



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From: dns.wales <dns.wales@planninginspectorate.gov.uk>
Sent: Monday, October 19, 2020 2:05 PM
Subject: 3260134 – Holyhead Waterfront Regeneration HRO – Scoping Consultation

Dear Sir/ Madam

The Planning Inspectorate has received a request for a Scoping Opinion on behalf of the Welsh Ministers for a Harbour Revision order (HRO) application under section 14 of the Harbour Act 1964 in connection with the Holyhead Waterfront Regeneration Project.

The request is accompanied by a Scoping Report prepared by the Applicant (attached). A location plan can be found at page13 of the Scoping Report (Proposed Development Zones, i.e. 1:1,750).

We are consulting your body about the scope and level of detail of the information which the proposed applicant will be required to supply in an environmental statement, if the application is made. **Please read the attached letter entitled 3260134 – Holyhead Waterfront Regeneration HRO – Scoping Consultation for further details.** I have also attached a list of other bodies consulted for your information.

Any response should be made by Friday 27November 2020.

For any further clarification, please don't hesitate to contact me

Kind regards

Giulia

Giulia Bazzoni

Swyddog Cynllunio / Tîm Cynllunio a'r Amgylchedd
Planning Officer / Planning & Environment Team

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Rhoi'r Cwsmer wrth wraidd popeth a wnawn!

Sylwer bod cynnwys y neges e-bost hon ac unrhyw atodiadau yn freintiedig a/neu'n gyfrinachol ac wedi'u bwriadu at ddefnydd y derbynnydd bwriadedig yn unig. Os nad chi yw derbynnydd bwriadedig y neges e-bost hon a'i hatodiadau, peidiwch â chymryd unrhyw gamau yn seiliedig arnynt, na'u copïo na'u dangos i unrhyw un. Cysylltwch â'r anfonwr os credwch eich bod wedi derbyn y neges e-bost hon ar gam ac yna dilëwch y neges e-bost o'ch system.

Dylai derbynnyddion nodi bod traffig e-bost ar systemau'r Arolygiaeth Gynllunio yn cael ei fonitro, ei gofnodi a'i archwilio i sicrhau bod y system yn gweithredu'n effeithiol ac at ddibenion cyfreithlon eraill. Mae'r Arolygiaeth Gynllunio wedi cymryd camau i gadw'r neges e-bost hon ac unrhyw atodiadau yn rhydd rhag feirysau. Nid yw'n derbyn unrhyw atebolrwydd am unrhyw golled neu niwed a achosir o ganlyniad i drosglwyddo unrhyw feirws ymlaen. Y derbynnydd sy'n gyfrifol am gynnal yr holl wiriadau angenrheidiol.

Mae'r datganiadau a fynegir yn y neges e-bost hon yn bersonol ac nid ydynt o reidrwydd yn adlewyrchu safbwyntiau neu bolisiâu'r Arolygiaeth.

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DPC:636174686179

		
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From: [REDACTED]
Cc: [REDACTED]
Subject: FW: HPE CM: RE: 3260134 – Holyhead Waterfront Regeneration HRO – Scoping Consultation
Date: 19 November 2020 15:18:15

From: NSIP Applications <[REDACTED]>
Sent: 19 November 2020 15:03
To: dns.wales <dns.wales@planninginspectorate.gov.uk>
Cc: NSIP Applications [REDACTED]
Subject: HPE CM: RE: 3260134 – Holyhead Waterfront Regeneration HRO – Scoping Consultation

Dear Giulia

Thank you for your letter dated 19th October consulting HSE before applying for planning permission for the Holyhead Waterfront Regeneration.

Will the proposed development fall within any of HSE's consultation distances?

With reference to plan ***Holyhead Waterfront DNS - Proposed Development Zones*** (Drawing No. 2571-2-00-202, Rev D - 09/09/2020), the proposed project/development does not currently fall within the consultation distances of any Major Hazard Installation(s) or Major Accident Hazard Pipeline(s).

Please note if prior to the granting of a development consent order for this proposed development, Hazardous Substances Consent is granted for a Major Hazard Installation or there is notification of a Major Accident Hazard Pipeline within or in the vicinity of the development, HSE reserves the right to revise its advice.

Would Hazardous Substances Consent be needed?

The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) may require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended. The substances, alone or when aggregated with others, for which HSC is required, and the associated Controlled Quantities, are set out in The Planning (Hazardous Substances) (Wales) Regulations 2015.

Hazardous Substances Consent would be required if the site is intending to store or use any of the Named Hazardous Substances or Categories of Substances and Preparations at or above the controlled quantities set out in schedule 1 of these Regulations.

Further information on HSC should be sought from the relevant Hazardous Substances Authority.

Explosives sites

-
HSE has no comment to make, in this regard, as there are no licensed explosive sites in the vicinity.

Kind regards

[REDACTED]

Monica Langton
Divisional Support Team
CEMHD
1.2 Redgrave Court
Bootle
Tel: [REDACTED]

PLEASE NOTE: My working days are now Wednesday, Thursday and Friday

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From: dns.wales <dns.wales@planninginspectorate.gov.uk>

Sent: 19 October 2020 17:03

Subject: HPE CM: RE: 3260134 – Holyhead Waterfront Regeneration HRO – Scoping Consultation

Dear Sir/ Madam

Following my previous email, please find attached two plans which would help you identify the location of the proposal.

Kind regards

Giulia

From: dns.wales <dns.wales@planninginspectorate.gov.uk>

Sent: 19 October 2020 14:05

Subject: 3260134 – Holyhead Waterfront Regeneration HRO – Scoping Consultation

Dear Sir/ Madam

The Planning Inspectorate has received a request for a Scoping Opinion on behalf of the Welsh Ministers for a Harbour Revision order (HRO) application under section 14 of the Harbour Act 1964 in connection with the Holyhead Waterfront Regeneration Project.

The request is accompanied by a Scoping Report prepared by the Applicant (attached). A location plan can be found at page 13 of the Scoping Report (Proposed Development Zones, i.e. 1:1,750).

We are consulting your body about the scope and level of detail of the information which the proposed applicant will be required to supply in an environmental statement, if the application is made. **Please read the attached letter entitled 3260134 – Holyhead Waterfront Regeneration HRO – Scoping Consultation for further details.** I have also attached a list of other bodies consulted for your information.

Any response should be made by Friday 27 November 2020.

For any further clarification, please don't hesitate to contact me

Kind regards

Giulia

Giulia Bazzoni

Swyddog Cynllunio / Tîm Cynllunio a'r Amgylchedd
Planning Officer / Planning & Environment Team

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Dylai derbynnyddion nodi bod traffig e-bost ar systemau'r Arolygiaeth Gynllunio yn cael ei fonitro, ei gofnodi a'i archwilio i sicrhau bod y system yn gweithredu'n effeithiol ac at ddibenion cyfreithlon eraill. Mae'r Arolygiaeth Gynllunio wedi cymryd camau i gadw'r neges e-bost hon ac unrhyw atodiadau yn rhydd rhag feirysau. Nid yw'n derbyn unrhyw atebolrwydd am unrhyw golled neu niwed a achosir o ganlyniad i drosglwyddo unrhyw feirws ymlaen. Y derbynnydd sy'n gyfrifol am gynnal yr holl wiriadau angenrheidiol.

Mae'r datganiadau a fynegir yn y neges e-bost hon yn bersonol ac nid ydynt o reidrwydd yn adlewyrchu safbwyntiau neu bolisiau'r Arolygiaeth.

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Maes Y Ffynnon,
Penrhosgarnedd,
Bangor,
Gwynedd
LL572DW

Giulia Bazzoni
Planning & Environment Officer
The Planning & Environment Team
The Planning Inspectorate
Crown Buildings
Cathays Park Cardiff
CF10 3N

ebost/email:

[REDACTED]
[REDACTED]

25/11/2020

Annwyl Syr/Madam / Dear Sir/Madam,

PROJECT NAME: HOLYHEAD WATERFRONT REGENERATION SCHEME
SITE ADDRESS: HOLYHEAD WATERFRONT, ANGLESEY, NORTH WALES
PROPOSED DEVELOPMENT: HARBOUR REVISION ORDER UNDER SECTION 14 OF THE HARBOURS ACT 1964, A MIXED-USE REGENERATION SCHEME WHICH WOULD INCLUDE A NEW MARINA

Thank you for referring the above proposal for a scoping opinion, which we received on 19/10/2020. NRW has reviewed the information provided in the EIA Scoping Report (dated 24/9/2020) and the following comments refer to matters NRW consider will need to be taken into consideration and applied to the Environment Impact Assessment (EIA) and the resulting Environmental Statement (ES).

General comments

As summarised in Section 4.4 and given in Appendix D of the EIA scoping report, NRW has previously provided detailed comments on this development for a Section 73 application (VAR/2020/20/EIA). The Section 73 application was supported by an EIA (referred to as the '2020 ES' in the EIA Scoping Report) which provided updated baseline information and assessment from the scheme approved in 2014. The scheme has now been revised and the proposed changes are summarised in section 1.2.2 of the EIA Scoping report. The ES that will support the new application will need to be updated to fully assess any likely significant effects arising from the proposed changes. As such, our advice below will mainly focus on those effects arising from the changes to the scheme as described in section 1.2.2. In relation to the previous advice referred to in Section 4.4 and Appendix D, we welcome the statement that these issues will be considered and included in the ES.

Coastal Processes

Section 1.5 of the report describes the study area as 2km, being based on potential effects from changes in hydrodynamics and sediment transport (which includes changes within the revised project proposal). It is also stated that the 2km will be informed by the modelling undertaken as described in section 5.1.4. Currently the 2km radius intersects the beach at Penrhos, due to the pocket beach nature of the coastline round North Anglesey, it would be recommended that the study area be extended to the East to the headland at Penrhos at a minimum and potentially further if the modelling shows this to be needed.

It is noted that capital dredge arisings will be considered for deposition at Holyhead North disposal ground. Currently, Holyhead North is known to be effective at dispersing nonconsolidated fines, however if sediment of a different composition is required to be disposed of, this will need a specific environmental assessment. The capacity of the site will also need to be considered in relation to other projects and pressures within the area, as identified in the cumulative assessment section 6.2.

Section 5.2.2.3 states that habitat loss under the footprint of the breakwater was covered in the '2020 ES' and it does not refer to any changes in footprint of the breakwater. It is unclear if there are any changes to the design structure of the breakwater. The ES will need to fully assess any impacts and/or changes on hydrodynamics and sediment movement as a result of any design variation to the breakwater and any subsequent effects on ecological interest over the construction, operation and decommissioning timescales.

Benthic Ecology

Section 5.2.2.3 states that habitat loss under the footprint of the breakwater was covered in the '2020 ES' and it does not refer to any changes in footprint of the breakwater. It is unclear if there are any changes to the design structure of the breakwater. We refer the applicant to our advice on Coastal Processes given above whereby: "The ES will need to fully assess any impacts and/or changes on hydrodynamics and sediment movement as a result of any design variation to the breakwater and any subsequent effects on ecological interest over the construction, operation and decommissioning timescales."

We agree with the below additional key issues identified in Section 5.5.2.3 to be assessed in the 2020 ES following the changes to the application:

- *"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.*
- *That the littoral and sublittoral rock habitats within the footprint of the Proposed Development should be considered as Annex I rocky reef habitat.*
- *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".*

In Section 5.5.2.4 the applicant says “*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.*” We welcome this approach and we would be happy to engage in a discussion with the applicant to develop a survey design fit for purpose. We also advise the applicant 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.

Invasive non-native marine species

There are concerns that the proposal could aid the spread of *Didemnum vexillum* (Carpet sea-squirt) so we welcome the statement in section 5.5.2.4 of the EIA Scoping report that 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”. We would expect this information to be included within the ES or as an appendix to the ES.

Fish and Shellfish Resources

We welcome the inclusion of consideration of fish and shellfish within the EIA as stated in Section 5.5.4. However, we do not agree that the effects of the disposal of dredged material upon fish and shellfish can be scoped out until we have had the opportunity to review the results of the sediment testing conducted, and it has been determined that the material is suitable for disposal at Holyhead North disposal ground (see section on water quality above). If there are any residual concerns on the disposal of dredged material due to the results of the sediment testing conducted, then further assessment of the effects of its disposal upon fish and shellfish may be required. We also advise that a list of species to be assessed by the EIA as fish and shellfish receptors is provided to NRW for agreement, to ensure that all the necessary species are assessed.

In addition to the impact pathways identified in Section 5.5.4.2, it is advised that the following effects are all also considered during the EIA for fish and shellfish receptors:

- Noise, vibration and light disturbance during all construction activities;
- Entrainment, injury and mortality during dredging activities;
- Smothering during dredging activities; and
- Direct loss of habitat from land reclamation and dredging activities (in addition to indirect habitat alteration as a result of changes to hydrodynamic and sedimentary processes already scoped in).

The assessment of the above impact pathways will be able to inform the assessment of effects upon commercial and recreational fisheries in the area.

Marine mammals

We are satisfied with the description of how impacts via noise will be re-assessed in '5.9 Noise and Vibration; 5.9.4 Approach to providing required information' in that noise assessments will be re-calculated to reflect the updated description of works.

We agree with the proposed approach to provide the required information outlined in 'Section 5 Scoping of environmental effects; 5.5.5.4 Approach to providing required information' & in 'Section 7 Habitats Regulations Assessment; 7.4 Approach to providing required information', wherein it is described that the HRA LSE screening will be updated to reflect the revised proposed development.

The suitability of the proposed update to the noise assessment and updated LSE screening to accurately reflect the new works will be determined upon receipt of those documents.

Marine Ornithology

In relation to the proposed changes to the application, we agree with the additional key issue identified in section 5.5.3.3 "*Potential impact on foraging coastal and marine birds due to temporary effects on the availability of prey resources during dredging and disposal activities*" and advise that the direct and in-direct effects of dredging activities on the SPAs will need to be fully assessed in the ES, and any necessary mitigation measures identified.

Marine Water Quality and Water Framework Directive (WFD)

Section 5.8.3.1 of the Scoping report highlights the key issues identified in the 2020 ES. Please note, in our response dated 13/5/2020 (Appendix D4), we provided a number of comments relating to marine water quality and WFD. We advise that the applicant fully considers and addresses the comments raised in Annex 1 of that response as part of any updated ES.

In relation to new baseline information, section 5.8.2.2 of the Scoping report states that "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". We note that disposal at Holyhead North will be subject to a Marine Licence application from NRW. We also note that the applicant will be requesting EIA Scoping advice from NRW's Permitting Service with respect to the Marine Licence.

Section 5.8.3.2 highlights the changes (relating to dredging now proposed) since the 2020 ES was produced and refers to the following key issue that is now relevant: "Contamination of marine water and sediment quality through dredging and disposal activities during construction". We advise that the effects of dredging and dredge disposal on marine water

quality will need to be fully assessed in the ES, and any necessary mitigation measures identified. This information should also inform the revised WFD compliance assessment.

Section 4.3 of the report highlights that NRW's Marine Licensing Team were previously consulted with respect to the Sediment Sample Plan. As stated in section 1.1 of the Scoping report, a scoping opinion should be requested from NRW's Marine Licensing Team with respect to the works subject to a Marine Licence.

It is unclear whether the changes proposed to the breakwater will include changes to its design. NRW advises that any changes to the breakwater design will need to be adequately assessed and the footprint of the breakwater will need to be considered as permanent habitat loss.

If further surveys are required to investigate the footprint of the breakwater (if this differs from its current design and further surveys are required) then an analysis of the material will be required for contaminants and particle size analysis before it can be determined as suitable for the dredged arisings to be kept in the marine environment (i.e. disposed of at Holyhead North licensed disposal ground).

We welcome the statement provided by the Applicant in Section 5.8.4, that the results of the sediment sampling will be used to assess impacts on water and sediment quality. We also advise that it will be necessary to consider this information in the context of potential effects on biota.

Coastal Habitats

The proposal has the potential for increased recreational pressure on the Holy Island Coast SSSI and SAC, which could impact on the features of these sites. We agree in principle that the mitigation measures will be sufficient to mitigate potential impacts, but note there will be some work in agreeing appropriate levels of funding and associated detail.

We agree that the changes to the proposed development as described in section 1.2.2 are unlikely to result in additional significant effects, above and beyond that assessed in the 2020 ES. However, we would recommend that the applicant considers the provision of detailed mitigation measures in the ES.

Protected Landscape

The proposal is located partly within the Ynys Môn / Anglesey Area of Outstanding Natural Beauty (AONB) so the EIA will need to fully assess the impacts of the proposal (as revised) on views from the AONB. The viewpoints set out in Figure 5.1 are accepted. Figure 5.1 viewpoint locations needs to show the AONB and any sections of Heritage Coast that might also lie within this area, to better represent the landscape and visual context. The development's visual integration and avoidance of visual prominence is an important development strategy for this site, to avoid unnecessary visual effects upon the public views from the AONB.

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

The ES will need to identify impact pathways for protected sites, clearly assess the possible levels of impact and, where impacts are likely, should provide full details of appropriate mitigation measures to address those impacts.

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully

Kate Griffith

Senior Marine Advisor

Marine Area Advice and Management Team



Llywodraeth Cymru
Welsh Government

Plas Carew, Unit 5/7 Cefn Coed
Parc Nantgarw, Cardiff CF15 7QQ

email [c](#)

Planning & Environment Team
The Planning Inspectorate

dns.wales@planninginspectorate.gov.uk

Eich cyfeirnod
Your reference

DNS/3260134

Ein cyfeirnod
Our reference

Dyddiad
Date

12 November 2020

Llinell uniongyrchol
Direct line

Ebost
Email:

Dear Sir/Madam

Scoping opinion in regard to the contents of an environmental impact assessment (EIA) to accompany an application for a Harbour Revision Order for the Holyhead Waterfront Regeneration Scheme that will be submitted for determination by the Welsh Ministers following the Development of National Significance procedures.

Thank you for your email of 19 October asking for Cadw's view on contents of the scoping report described above.

Cadw, as the Welsh Government's historic environment service, has assessed the characteristics of this proposed development and its location within the historic environment. In particular, the likely impact on designated or registered historic assets of national importance. In assessing if the likely impact of the development is significant Cadw has considered the extent to which the proposals affect those nationally important historic assets that form the historic environment, including scheduled ancient monuments, listed buildings, registered historic parks, gardens and landscapes.

These views are provided without prejudice to the Welsh Government's consideration of the matter, should it come before it formally for determination.

Assessment

Scheduled Ancient Monuments **AN019 Caer y Twr**

Listed Buildings

5743 HOLYHEAD BREAKWATER, SOLDIER'S POINT II*

Mae'r Gwasanaeth Amgylchedd Hanesyddol Llywodraeth Cymru (Cadw) yn hyrwyddo gwaith cadwraeth ar gyfer amgylchedd hanesyddol Cymru a gwerthfawrogiad ohono.

The Welsh Government Historic Environment Service (Cadw) promotes the conservation and appreciation of Wales's historic environment.

Rydym yn croesawu gohebiaeth yn Gymraeg ac yn Saesneg.
We welcome correspondence in both English and Welsh.



BUDDSODDWR MEWN POBL
INVESTOR IN PEOPLE



5744 LIGHTHOUSE ON HOLYHEAD BREAKWATER II
5771 CUSTOMS HOUSE, SALT ISLAND II
5772 HARBOUR OFFICE, SALT ISLAND II*
5773 GEORGE IV ARCH, SALT ISLAND II*
14729 ZODIAC RESTAURANT, BEACH ROAD (N SIDE) II
14730 TRINITY HOUSE OFFICE, BEACH ROAD (N SIDE) II
14731 TRINITY YARD LARGE WORKSHOP, BEACH ROAD (N SIDE) II
14732 TRINITY YARD SMALL WORKSHOP, BEACH ROAD (N SIDE) II
14755 GUNPOWDER MAGAZINE, BREAKWATER QUARRY II
14756 COTTAGE ON CORNER OF PENTRE PELLA (INCLUDING FOREGARDEN WALL),
14759 PORTHYFELIN HOUSE, SOLDIER'S POINT II
14760 SOLDIER'S POINT HOUSE, SOLDIER'S POINT II
14761 SCREEN WALL TO SOLDIER'S POINT HOUSE, SOLDIER'S POINT II

Conservation Areas:
Holyhead Beach

The above designated heritage assets are inside the application area or are inside 3km and are likely to have views of the proposed development. It is likely that the changes to these historic assets and views to and from will have an impact on how they are experienced, understood and appreciated

A scoping report has been prepared by Royal HaskoningDHV, which includes section 5.11 Archaeology and Cultural Heritage that identifies a study area around the proposed development of 1.5km; however, in our opinion, particularly due to the topography of the surrounding area, this should be increased to 3km. The EIS will need to consider all heritage assets that will be affected by the proposed development in this zone and an initial list of these assets, we have identified, are given above, but these will need to be checked on site in accordance with Section 1 of the Welsh Government guidance "The Setting of Historic Assets in Wales".

The sources that will be searched for the EIA given in the scoping report are appropriate. The results of these searches should be assessed in accordance with the Standard and Guidance for Desk-based Heritage Assessment set by the Chartered Institute for Archaeologists and the impact of the development on the settings of the historic assets should be carried out in accordance with the Welsh Government guidance "The Setting of Historic Assets in Wales". If dive surveys and/or seabed geophysical surveys are undertaken these works should also be carried out in accordance with the relevant standard and guidance set by the Chartered Institute for Archaeologists.

Yours sincerely

Nick Segust
Diogelu a Pholisi/ Protection and Policy

Annex A

Scheduled Ancient Monuments

AN019 Caer y Twr

Listed Buildings

5743 HOLYHEAD BREAKWATER, SOLDIER'S POINT II*
5744 LIGHTHOUSE ON HOLYHEAD BREAKWATER II
5771 CUSTOMS HOUSE, SALT ISLAND II
5772 HARBOUR OFFICE, SALT ISLAND II*
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14760 SOLDIER'S POINT HOUSE, SOLDIER'S POINT II
14761 SCREEN WALL TO SOLDIER'S POINT HOUSE, SOLDIER'S POINT II

Conservation Areas:

Holyhead Beach

Giulia Bazzoni
Planning and Environment Team
The Planning Inspectorate
Crown Buildings
Cathays Park
Cardiff
CF10 3NQ

26 November 2020

Dear Giulia,

HARBOUR ACT 1964, SCHEDULE 3

Environmental Impact Assessment (EIA) Scoping Opinion Request in connection with an Application for a Harbour Revision Order

Project Name: Holyhead Waterfront Regeneration Scheme

Thank you for your letter dated 19 October 2020 inviting the Maritime and Coastguard Agency (MCA) to comment on the Scoping Opinion request for the Holyhead Harbour Revision Order.

The Scoping Report has been considered by representatives of UK Technical Services Navigation. We note that the regeneration scheme includes (but not limited to) a new marina, reclaimed land, a new breakwater extending into Holyhead Harbour, marine based construction and dredging activities. The MCA has an interest in the works associated with the marine environment, and the potential impact on the safety of navigation, access to ports, harbours and marinas and any impact on our search and rescue obligations. We would therefore like to comment as follows on the Scoping Report:

- 1) The MCA would expect any works in the marine environment to be subject to the appropriate consents under the Marine and Coastal Access Act (2009) before carrying out any marine licensable works. I note in section 1.1 that it states "*The following consents will be required to permit the construction and operation of the Proposed Development:*
 - a. *Detailed Planning Permission from the IoACC for all works above Mean Low Water (MLW);*
 - b. *A Marine Licence from Natural Resources Wales (NRW) for all works below Mean High Water Spring (MHWS); and,*

c. *A Harbour Revision Order (HRO) from the Welsh Government (WG).*

2) The MCA will expect the project to carry out a Navigation Risk Assessment on the impact of the works on shipping and navigation. We note the applicant's commitment in para 5.10.4 to carry out a Navigational Study, which will be used to support the EIA. The assessment will be informed through consultation with the Port of Holyhead Harbour Master and other key stakeholders. The MCA would expect no effects to be scoped out of the assessment with regards to shipping and navigation, pending the outcome of the Navigation Risk Assessment and further stakeholder consultation.

3) We note that the site falls within the jurisdiction of Stena Line Ports Ltd who are the Statutory Harbour Authority for the Port of Holyhead. Section 2.2.2 states that *Conygar Holyhead Ltd, 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.* The MCA is usually consulted on the draft HRO.

4) To address the ongoing safe operation of the marine interface for this project, we would like to point the developers in the direction of the Port Marine Safety Code (PMSC) and its Guide to Good Practice. They will need to liaise and consult with the Statutory Harbour Authority and develop a robust Safety Management System (SMS) for the project under this code.

The sections that we feel cover navigational safety under the PMSC and its Guide to Good Practice are as follows:

From the Guide to Good Practice, section 7 Conservancy, a Harbour Authority has a duty to conserve the harbour so that it is fit for use as a port. The harbour authority also has a duty of reasonable care to see that the harbour is in a fit condition for a vessel to be able to use it safely. Section 7.8 Regulating harbour works covers this in more detail and have copied the extract below from the Guide to Good Practice.

7.8 Regulating harbour works

7.8.1 Some harbour authorities have the powers to license works where they extend below the high watermark, and are thus liable to have an effect on navigation. Such powers do not, however, usually extend to developments on the foreshore.

7.8.2 Some harbour authorities are statutory consultees for planning applications, as a function of owning the seabed, and thus being the adjacent landowner. Where this is not the case, harbour authorities should be alert to developments on shore that could adversely affect the safety of navigation. In any case harbour authorities should ensure that the MMO or appropriate licensing authority consults them with regard to any applications for works or developments in or adjacent to the harbour area. Where necessary, consideration should be given to requiring the planning applicants to conduct a risk assessment in order to establish that the safety of navigation is not about to be put at risk. Examples of where navigation could be so affected include:

- high constructions, which inhibit line of sight of microwave transmissions, or the performance of port radar, or interfere with the line of sight of aids to navigation;
- high constructions, which potentially affect wind patterns; and
- lighting of a shore development in such a manner that the night vision of mariners is impeded, or that navigation lights, either ashore and onboard vessels are masked, or made less conspicuous.

7.8.3 There is a British Standards Institution publication on Road Lighting, BS5489. Part 8 relates to a code of practice for lighting which may affect the safe use of aerodromes, railways, harbours and navigable Inland waterways.

5) A preliminary assessment on the potential impacts to Search and Rescue and emergency response in the area will need to be included to ensure there are no impacts on SAR operations.

I hope you find this information useful at Scoping Stage.

Yours sincerely,

A black rectangular box used to redact the signature of Helen Croxson.

Helen Croxson
OREI Advisor
UK Technical Services – Navigation

From:

Subject:

Date:

RE: 3260134 – Holyhead Waterfront Regeneration HRO – Scoping Consultation

27 November 2020 08:27:31

Dear Stephen,

As Giulia is not working today, please accept this as acknowledgement of receipt of your response. Thank you for providing it.

Best wishes,

Rob Sparey

Robert Sparey

Swyddog Cynllunio / Rheolwr Cynllunio a'r Amgylchedd
Planning Officer / Planning & Environment Manager

Yr Arolygiaeth Gynllunio | The Planning Inspectorate
Adeilad y Goron | Crown Building,
Parc Cathays, | Cathays Park
Caerdydd, | Cardiff,
CF10 3NQ

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

From: Stephen Vanstone <[REDACTED]>

Sent: 27 November 2020 08:15

To: dns.wales <dns.wales@planninginspectorate.gov.uk>

Cc: [REDACTED]

Subject: RE: 3260134 – Holyhead Waterfront Regeneration HRO – Scoping Consultation

Good morning Giulia,

With reference to the attached, I can confirm that Trinity House are of the opinion that this project is likely to have a significant impact on local marine navigation.

We are content with the Scoping Report and note that a Navigation Study will be undertaken, which we are likely to have substantive comments on in due course. As part of this Navigation Study, risk mitigation measures should be fully considered, including any requirements for aids to navigation.

Kind regards,

Stephen Vanstone

Navigation Services Officer | Navigation Directorate | Trinity House

[REDACTED]

[REDACTED]



From: dns.wales [<mailto:dns.wales@planninginspectorate.gov.uk>]

Sent: 19 October 2020 14:05

Subject: 3260134 – Holyhead Waterfront Regeneration HRO – Scoping Consultation

Dear Sir/ Madam

The Planning Inspectorate has received a request for a Scoping Opinion on behalf of the Welsh Ministers for a Harbour Revision order (HRO) application under section 14 of the Harbour Act 1964 in connection with the Holyhead Waterfront Regeneration Project.

The request is accompanied by a Scoping Report prepared by the Applicant (attached). A location plan can be found at page13 of the Scoping Report (Proposed Development Zones, i.e. 1:1,750).

We are consulting your body about the scope and level of detail of the information which the proposed applicant will be required to supply in an environmental statement, if the application is made. **Please read the attached letter entitled 3260134 – Holyhead Waterfront Regeneration HRO – Scoping Consultation for further details.** I have also attached a list of other bodies consulted for your information.

Any response should be made by Friday 27November 2020.

For any further clarification, please don't hesitate to contact me

Kind regards

Giulia

Giulia Bazzoni

Swyddog Cynllunio / Tîm Cynllunio a'r Amgylchedd
Planning Officer / Planning & Environment Team

Yr Arolygiaeth Gynllunio | The Planning Inspectorate
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Rhoi'r Cwsmer wrth wraidd popeth a wnawn!

Sylwer bod cynnwys y neges e-bost hon ac unrhyw atodiadau yn freintiedig a/neu'n gyfrinachol ac wedi'u bwriadu at ddefnydd y derbynnydd bwriadedig yn unig. Os nad chi yw derbynnydd bwriadedig y neges e-bost hon a'i hatodiadau, peidiwch â chymryd unrhyw gamau yn seiliedig arnynt, na'u copïo na'u dangos i unrhyw un. Cysylltwch â'r anfonwr os credwch eich bod wedi derbyn y neges e-bost hon ar gam ac yna dilëwch y neges e-bost o'ch system.

Dylai derbynnyddion nodi bod traffig e-bost ar systemau'r Arolygiaeth Gynllunio yn cael ei fonitro, ei gofnodi a'i archwilio i sicrhau bod y system yn gweithredu'n effeithiol ac at ddibenion cyfreithlon eraill. Mae'r Arolygiaeth Gynllunio wedi cymryd camau i gadw'r neges e-bost hon ac unrhyw atodiadau yn rhydd rhag feirysau. Nid yw'n derbyn unrhyw atebolrwydd am unrhyw golled neu niwed a achosir o ganlyniad i drosglwyddo unrhyw feirws ymlaen. Y derbynnydd sy'n gyfrifol am gynnal yr holl wiriadau angenrheidiol.

Mae'r datganiadau a fynegir yn y neges e-bost hon yn bersonol ac nid ydynt o reidrwydd yn adlewyrchu safbwyntiau neu bolisiau'r Arolygiaeth.

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DPC:636174686179



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From: [DIO-Safeguarding-Offshore \(MULTIUSER\)](#)
To: [dns.wales](#)
Subject: RE:20201028-3260134 – Holyhead Waterfront Regeneration HRO – Scoping Consultation-DIO 2011-140-O
Date: 28 October 2020 08:08:17

Good Morning,

FAO Giulia Bazzoni

Further to your e-mail below regarding a Scoping Consultation for Holyhead Waterfront Regeneration HRO, I can confirm after investigation that the MOD has No Concerns relating to this project in the locations specified. I hope this information is sufficient for your purposes.

Regards

Michael Billings

Assistant Safeguarding Manager
Estates – Safeguarding

**Defence
Infrastructure
Organisation**

Building 49, DIO Sutton Coldfield, Kingston Road, B75 7RL

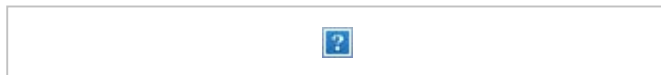
Due to COVID-19 I am working from home until further notice.

In line with the latest guidance, I am working offline where possible to ease the pressure on the IT network. Therefore I will only check emails and Skype periodically which will mean that I might not respond as promptly as usual.

Mob: [REDACTED] | **Email:** [REDACTED]

Website: www.gov.uk/dio/ | **Twitter:** @mod_dio

Read DIO's blog: [REDACTED]



From: dns.wales <dns.wales@planninginspectorate.gov.uk>
Sent: 19 October 2020 17:03
Subject: RE: 3260134 – Holyhead Waterfront Regeneration HRO – Scoping Consultation

Dear Sir/ Madam

Following my previous email, please find attached two plans which would help you identify the location of the proposal.

Kind regards

Giulia

From: dns.wales <dns.wales@planninginspectorate.gov.uk>

Sent: 19 October 2020 14:05

Subject: 3260134 – Holyhead Waterfront Regeneration HRO – Scoping Consultation

Dear Sir/ Madam

The Planning Inspectorate has received a request for a Scoping Opinion on behalf of the Welsh Ministers for a Harbour Revision order (HRO) application under section 14 of the Harbour Act 1964 in connection with the Holyhead Waterfront Regeneration Project.

The request is accompanied by a Scoping Report prepared by the Applicant (attached). A location plan can be found at page 13 of the Scoping Report (Proposed Development Zones, i.e. 1:1,750).

We are consulting your body about the scope and level of detail of the information which the proposed applicant will be required to supply in an environmental statement, if the application is made. **Please read the attached letter entitled 3260134 – Holyhead Waterfront Regeneration HRO – Scoping Consultation for further details.** I have also attached a list of other bodies consulted for your information.

Any response should be made by Friday 27 November 2020.

For any further clarification, please don't hesitate to contact me

Kind regards

Giulia

Giulia Bazzoni

Swyddog Cynllunio / Tîm Cynllunio a'r Amgylchedd
Planning Officer / Planning & Environment Team

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Sylwer: I warchod rhag feirysau cyfrifiadurol, gallai rhaglenni e-bost eich atal rhag anfon neu dderbyn rhai mathau o ffeiliau ar ffurf atodiadau. Gwiriwch osodiadau diogelwch eich rhaglen e-bost i benderfynu sut mae atodiadau'n cael eu trin.

Rhoi'r Cwsmer wrth wraidd popeth a wnawn!

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