

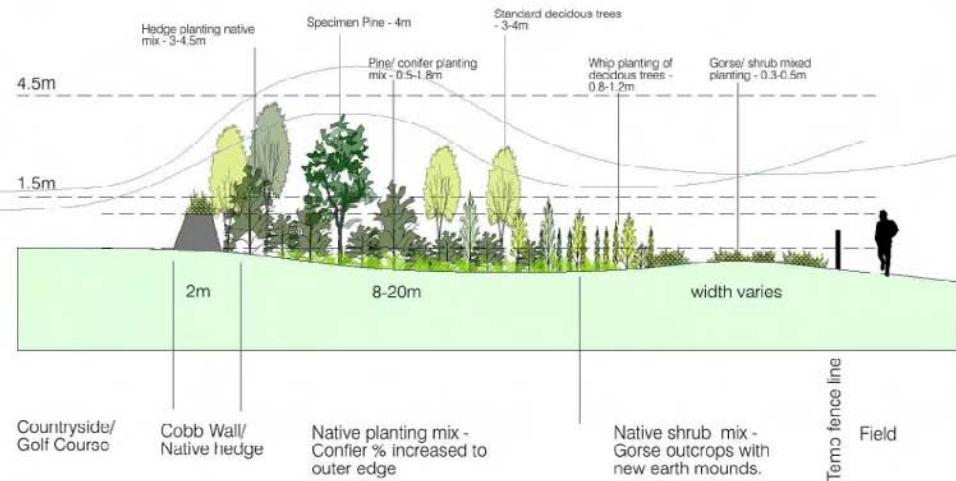
**PENRHOS, CAE GLAS & KINGSLAND, HOLYHEAD**

**APPLICATION NUMBER 46C427K/TR/EIA/ECON**

**IOACC COMMENTS 28.02.13 - PLANIT RESPONSE**

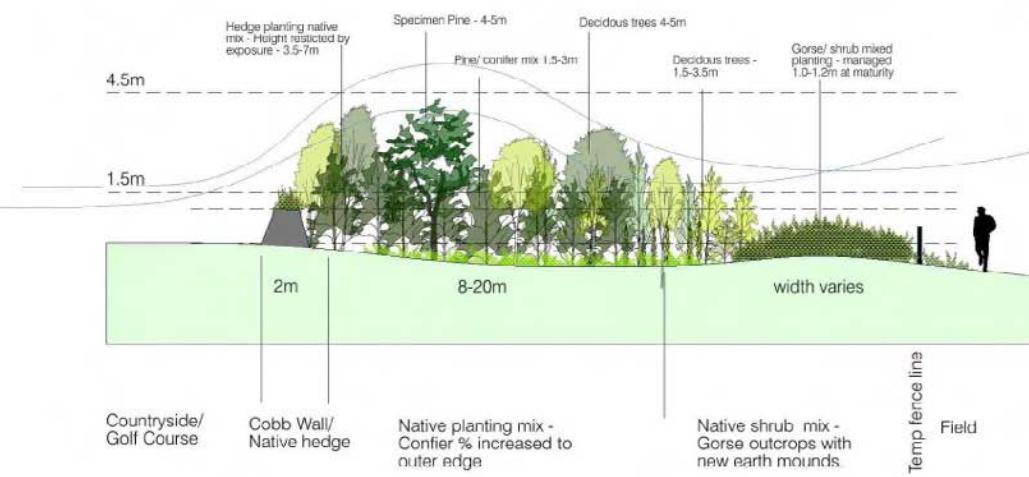
**planit**  
intelligent environments

## Typical Woodland Edge Planting As Planted - Years 1-3



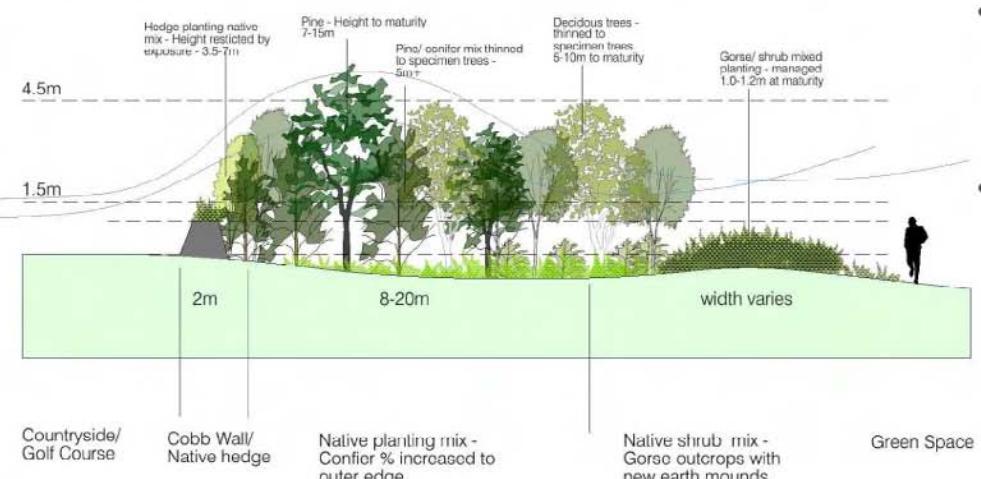
- Standard trees and specimens planted
- Nursery tree mix planted to provide shelter and sacrificial edge to block
- Ground cover planted/ grassland areas managed

## Typical Woodland Edge Planting Phase 2 - Years 4-10



- Planting establishes - nursery mix dominant in first 10 years.
- Later management to thin mix and allow climax species space.
- Shrub/ grassland matures - managed to promote habitat value.

## Typical Woodland Edge Planting Phase 3 - Years 10+



- Mixed native climax species dominant - managed to promote variety in tree/ field layers
- Shrub and Grassland managed.

Figure 1: Penrhos Leisure Village,  
Design and Access Statement, November 2012  
Page 89

## Landscape Assessment

### COMMENT

3.3.1 Key Landscape Elements - There does not appear to be specific reference to agricultural land.

### RESPONSE

Agricultural land is also considered to be a key landscape element. However, it has been assessed as low quality Grade 4 agricultural land.

### COMMENT

3.3.5 No explanation is given on the methodology on how quality and value are assessed, other than quality is assessed by a judgement call/professional opinion.

The assessment of landscape quality and value was based on judgements, made by suitably qualified professionals. Judgements on quality were linked to the results of the local landscape characterisation study carried out to inform the application, and took into consideration the physical state of the landscape, and about its intactness, from visual, functional, and ecological perspectives. It also reflects the state of repair of individual features and elements that make up the character in any one place, in accordance with the guidance.

In accordance with guidance contained in, *Methods of Environmental Impact Assessment, 3rd Edition*, Chapter 6, (written by Rebecca Knight of Land Use Consultants, 2009), judgements on landscape value were based on the relative value that is attached to different landscapes. This is often recognised through landscape designations. However, professional judgement was also used to determine where a landscape is valued by society, for example for its perceptual aspects, cultural associations, its functional role or other conservation issues. Although all covered by the AONB designation, there is clearly a difference in value between the Penrhos site, with its cultural associations as part of the historic Penrhos estate and high recreational use, and the currently inaccessible Cae Glas site. The judgements on landscape value aim to identify and assess these differences in value, rather than relying on only a designation that covers 21km<sup>2</sup> of hugely varied landscape.

### COMMENT

3.5 I would recommend that a significant depth of woodland edge/screen planting is retained to maintain character/safeguard screening at the Penrhos site and that this woodland screen is protected by a preservation order/management plan for mitigation purposes.

The Penrhos Design and Access Statement (D&A), produced as part of the application, provides indicative detail on how proposed woodland buffers will be established to provide screening of headland lodges.

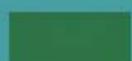
The page opposite, extracted from page 89 of the D&A, illustrates a potential planting regime to promote establishment from year 1 to 10+. In conjunction with a new management plan, this provides a robust structure of planting and fencing to provide a protected woodland zone that will mature into a species rich block with associated field and grassland layers. These new areas of woodland will be invaluable in helping to screen views into the site and creating green buffers to adjacent land uses.

A long-term management plan for retained woodland will ensure continuity of canopy cover and increase tree-related values. The security of a sustainable business model will provide the required funding to improve and maintain the structure of retained woodlands/plantation. An absence of any such management would allow a steady decline in value, before the natural cycle of self-sustaining woodland could be established.



Fig. 52 - Proposed Woodland Structure Plan

Existing woodland areas retained and managed to promote longevity and diversity within the blocks.



Areas of new species rich woodland planting



Existing Woodland block managed to accommodate new leisure uses



Figure 2: Penrhos Leisure Village,  
Design and Access Statement, November 2012  
Page 88

## Potential Impacts

### COMMENT

5.1 No written guidance is provided on the new areas of planting, tree retention or species selection to assess these measures of mitigation.

The diagram opposite (Figure 2), extracted from page 88 of the D&A identifies primary areas for new woodland planting. New tree planting will also be introduced within existing areas of woodland, as part of the ongoing management.

Species for new areas of planting will be selected through further consultation with the Forestry Commission and local provenance suppliers to ensure an appropriate mix. Typical species may include:

**Climax trees** - Oak, Pine, Sycamore, Sweet Chestnut, Hornbeam, Beech, Ash - subject to current restrictions due to Ash dieback - Chalara fraxinea fungus.

**Nurse Trees** - Birch, Alder, Field Maple, Rowan, Willow.

**Edge / under storey** - Hazel, blackthorn, hawthorn, Holly, Dog Rose, Gorse.

At this outline stage, it is not possible to determine exactly which trees will be retained or removed. However, clear principles for development within key areas of woodland have been established, and are detailed within Appendix A which accompanies this report, "*Methodology for Development in Woodland Blocks*". The retention of trees and woodland will form a key principle in the ongoing development of the masterplan.

Tree retention and removal drawings will be provided at the detailed design stage, following indepth tree survey work and design development. This information will be submitted for approval at the reserved matters application stage and no trees will be removed until agreed with IOACC.

### COMMENT

5.2 I would recommend further information/guidance is provided in summary to better understand the approach and extent of the proposed mitigation for all 3 sites as this is imperative to alleviate/address the potential adverse impacts on the AONB.

All mitigation methods briefly described within the Landscape and Visual Impact Assessment (LVIA) have been distilled from the D&A which forms part of the application, and should be read in conjunction with the LVIA in order to fully understand the mitigation measures that have been developed as part of the design process.

For example, one of the mitigating principles for Penrhos is as follows:

- To help preserve the open, agricultural character of the coastal edge around the headland, a significant area of advance planting will be undertaken and allowed to establish on the headland prior to the development of the headland lodges in order to provide visual screening. This will transform the more inland areas of the existing grazing land into species rich coastal grassland, with new native shrub areas and woodland blocks.

This principle reflects page 102 of the D&A (Figure 3 on the following page) which provides indicative measurements to show the extent of agricultural land retained, and the proposed approach to advanced structure planting.

The D&A provides details on proposed mitigation and enhancement measures for each of the three

## 10.4.5 Headland Lodges - Advanced Structure Planting

The headland lodges are part of the unique offer presented by the Penrhos Leisure Village, but they are also on one of the most prominent areas of the site. The design concept therefore is to maximise sea views, whilst embedding them into their environment.

It is proposed that a significant area of advance planting be undertaken on the headland prior to

lodges being sited, in order to ensure that the new buildings are suitably screened from sensitive views and planting is given time to establish. This will transform the centre of the existing grazed fields into species rich coastal grassland, with new traditional stone faced earth banks, marshy areas, native shrub stands, and woodland blocks. This new framework will create numerous new habitat opportunities, as well as provide an attractive setting

for the new lodge buildings. To help preserve the open, agricultural character of the coastal path, a buffer strip of grazed grassland will be maintained around the edge of the headland, with stock fencing and stone walls forming the boundaries.

Early phase works will also include low impact access roadways where required to reduce damage and disruption during later construction phases.

Fig. 60 - Advance Planting Illustrative High Level View



Native shrub stands



Extension of coastal grassland areas



New boundaries of traditional stone walling



Light touch access roads in place

Figure 3: Penrhos Leisure Village,  
Design and Access Statement, November 2012, page 102

sites in relation to potential landscape and visual impacts, and in particular, potential impacts on the AONB, and these are summarised below:

Penrhos:

- Advanced coastal tree planting and measures to ensure short and long term establishment
- Mounding and proposed planting to minimise impact of coastal lodges
- Maintaining large areas of existing landscape character.
- Traditional dry stone walls and stone faced planted banks - Cloddiau - <http://www.dry-stone.co.uk/Pages/Books/Articles/Cloddiau1.html>
- Traditional materials used to face and as details in proposed buildings (locally sourced where applicable).
- Management of existing woodlands to preserve, enhance and increase habitat / bio-diversity.
- Improvements to existing Coastal footpath, enhanced coastal views, access for all.
- General Improvements to existing Coastal Park see: page 110 of D & A 10.4.11
- Improvements and active use for existing poor quality buildings - e.g. bathing house,
- Sensitive retention and improvements to existing historic features e.g. Boat House

Cae Glas:

- Incorporation of controlled public access for recreational use and enjoyment to areas within the site, which is currently unavailable. The proposed new Visitor Centre will create a new hub to facilitate access and enjoyment.
- Retention of a landscape buffer around the Trefignath burial chamber to avoid impacts on the setting of this important historic feature.
- Advanced planting of tree and shrubs, along with windbreak screens to facilitate growth, in order to maximise visual screening of development.
- Management of existing woodlands and areas of high landscape and habitat value to preserve, enhance and increase habitat / bio-diversity.
- Large areas of existing landscape character and land use retained.
- New planting to promote biodiversity and habitat.
- Retention and reuse of historic features - the remaining remnants of the Tre-Gof farmstead will be sensitively integrated into the design of the proposed hotel.
- The use of natural materials will predominate in order to minimise potential visual impacts of proposed development. Cedar shingle and green roofs will also be employed to further reduce potential impacts.
- The construction and positioning of lodges within the woodland will be guided by detailed.
- Visual screening from the A55 to the north through creation of a planted bund.

Kingsland:

- The semi-natural heathland character to the west of the public footpath through the Kingsland site, has been identified as high in terms of quality and value. This areas will be kept free of development, and furthermore, the character, species and value of this area will be introduced to the east of the footpath and allowed to infiltrate the development in order to embed it in the landscape.
- Advanced planting of tree and shrubs, along with windbreak screens to facilitate growth, in order to maximise visual screening of development.
- Substantial areas of new hedgerow planting to the boundaries of the site, and improvements to existing degraded hedgerows.
- Public accessibility for formal and informal recreation/play opportunities to public areas of green space within the site.
- A variety of housing types is proposed, along with a carefully considered mix of materials on each dwelling in order to help to visually 'break up' and reduce the visual impact of each dwelling and the development as a whole. Density, scale, massing and layout will be carefully considered.

## 10.4.7 Headland Lodges



Figure 4: Penrhos Leisure Village, Design and Access Statement, November 2012, page 105, with updated headland lodge section to show 2 x rows of headland lodges.

## 10.4.13 Coastal Park

### Coastal Path Experience

**Illustrative view** - View from the Battery Feature looking across the headland to the Boathouse and sea.

Open views across headland and out to sea maintained  
 Agricultural character of adjacent field maintained - limited intrusion from development  
 Coastal grassland managed for habitat diversity  
 Historic feature retained with new interpretation/ amenity value.



8 Figure 5: Penrhos Leisure Village, Design and Access Statement, November 2012, page 114

## **Building Design**

### **COMMENT**

6.1 I would recommend that further consideration should be given to reducing the height of a greater number of lodges closest to the headland than shown in the masterplan to reduce the potential adverse impacts in this sensitive area close to the coastal footpath.

Figure 4 opposite, taken from page 105 of the D&A, illustrates the proposed location for Headland Lodges. The proposals showed one row of sensitively designed Headland Lodges. This has now been updated to two rows of Headland Lodges, in response to the comments. The Headland Lodge design aims to respond to their particularly sensitive location on the headland. They have been designed with a monopitch green roof, with the use of natural materials designed to weather and blend into the changing seasonal landscape. In addition, they will be lower in height, effectively 1.5 storeys with a maximum height of 5.5 metres, accommodating living space on the upper floor within the pitch of the roof,

Figure 5 opposite illustrates a typical view from the Coastal Path, within close proximity to the Battery. The view illustrates the sensitive approach taken for the design of the headland lodges, and how this will enable the lodges to appear as subtle additions to the view, appropriate to the existing character of the headland.

### **COMMENT**

6.2 It is essential that BS5837 is used to inform the final numbers of lodges and layout within the wooded areas to retain an acceptable level of tree cover for both mitigation and amenity purposes.

Trees and woodland form a key element within the site and contribute substantially to site character. Therefore, significant effort will be made to retain and protect trees and woodland of value, in accordance with recognised standards.

Trees will be subject to detailed tree survey work to inform the continued design development at the detailed design stage, with information submitted for approval with the reserved matters application. As an indication of the approach to trees and woodland in key areas within the Penrhos and Cae Glas sites, indicative methodology for development within woodland blocks has been developed, refer to Appendix A which accompanies this document.

#### 10.4.5 Headland Lodges - Landscape

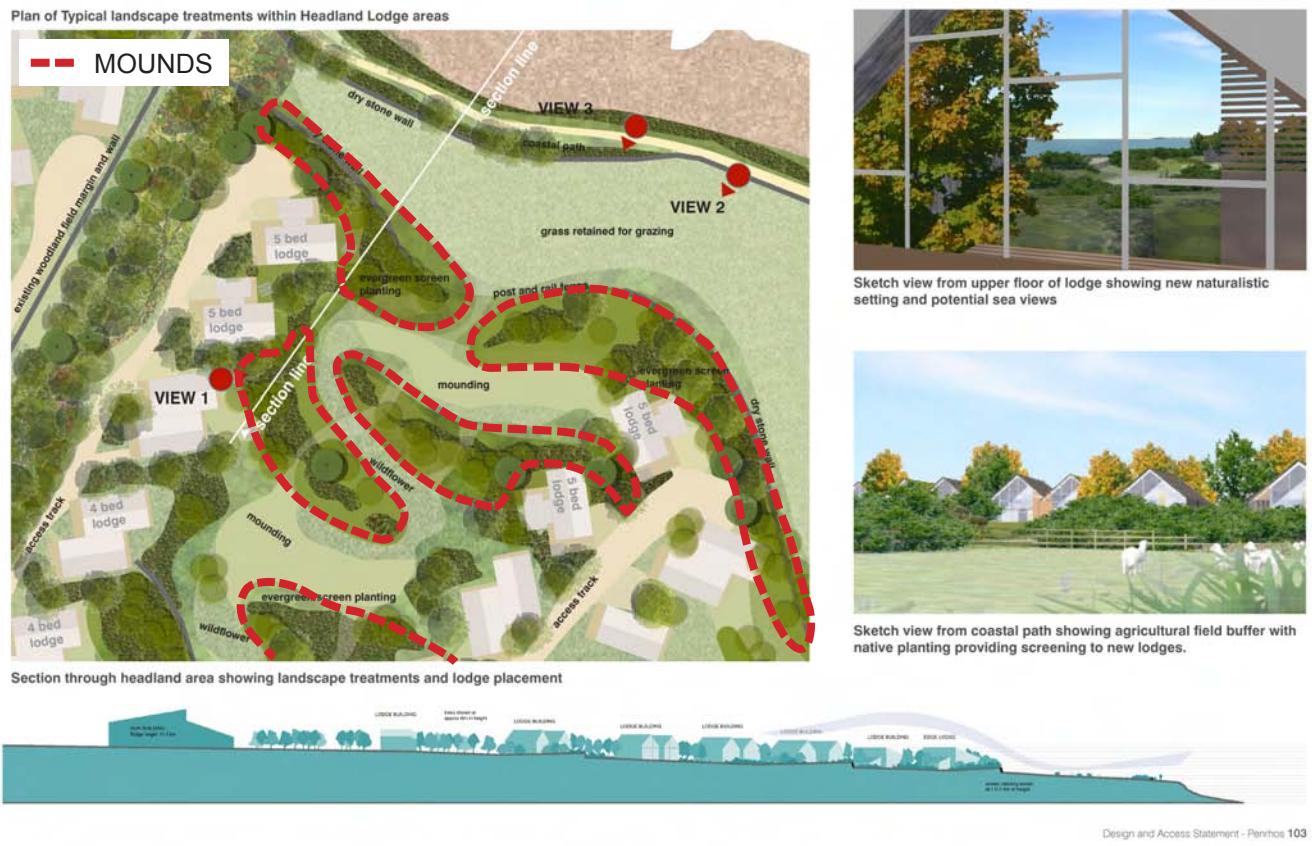


Figure 6: Penrhos Leisure Village, Design and Access Statement, November 2012, page 103

Feature/Nature of Impact	Timescale	Receptor Sensitivity	Magnitude of Impact	Significance of Impact	Confidence Level
The visual impact of HGV movement & general construction works	Medium Term	High	Moderate	Moderate Adverse	High
Visual and landscape impacts of remodelling ground levels.	Short Term	High	Minor	Negligible	High
The visual impact of site hoarding.	Medium Term	High	Minor	Minor Adverse	High
The visual impact of site lighting around construction areas	Medium Term	High	Minor	Moderate Adverse	High
The visual impact of offloading, storing and handling of materials within compound areas	Medium Term	High	Minor	Minor Adverse	High
The landscape impacts of incorporating services and utilities.	Medium Term	Medium	Minor	Minor Adverse	High
The visual impacts of temporary screening measure and protective fencing.	Medium Term	High	Minor	Minor Adverse	High
The landscape and visual impacts of temporary parking, on-site accommodation and work areas.	Medium Term	High	Moderate	Moderate Adverse	High
The landscape and visual impact of material stockpiles.	Medium Term	High	Minor	Minor Adverse	High

Figure 7: Landscape and Visual Impact Assessment, Construction Phase - Predicted Landscape and Visual Impacts

## Landscape Proposals

### COMMENT

7.1 I would recommend further information/guidance is provided on the landscape proposals in particular the areas of new screen planting and mounding to better understand the mitigation proposals.

Figure 6 opposite shows page 103 of the Design and Access Statement, and provides an illustrative detail area of the Penrhos headland. The drawing shows in some detail the approach to screen planting and mounding. The key principles include arranging lodges in a horse shoe layout, with mounding, dry stone walls and planting of native trees and shrubs around the lodges to provide partial screening and filtering of views from the coastal path, and more distant viewpoints. It is not the intention that the mounds, planting and walls will entirely screen the lodges, as this would result in a significant visual barrier and change to the existing open character of the headland. Instead, the lodges form a high quality element within the view, and the associated planting, mounds and walling serve to embed the lodges in the landscape. Broad compliance with the principles of screening as set out within the D&A can be a condition of the planning permission.

## Residual Impacts

### COMMENT

9.1 I would recommend including receptor sensitivity in table 9.1 to provide a more robust and full assessment.

Receptor sensitivity is included for completeness (Figure 7 opposite). Predicted impacts of the construction phase of the proposed development remain the same. Receptor sensitivity is as set out within the Methodology section of the Assessment.

## 10.2.4 Site Structure - Site Security

The security of the proposed development will be achieved through a variety of different boundary conditions, that respond to the character of the site.

In order to maintain the 'natural' feel, boundary edge conditions have been developed to minimise visual intrusion, and where possible replicate the character of the existing site boundaries, whilst still maintaining a robust and secure boundary to the development.

### Primary Security Line Type A

Existing woodland blocks used to provide screening to boundary - secure fence system used as overlooking/ supervision is limited.

Primary access is controlled by a 2.4m weld mesh fence set back from public routes with a minimum depth of buffer planting of 6m. Path edges may be defined by 1.2m stone faced bank or existing dry stone walls to provide a secondary informal defence line.

### Primary Security Line Type A1

Similar specification to Type A although buffer planting depth is increased to reflect sensitivity of location.

### Primary Security Line Type B

Again, existing woodland provides buffer to the fence line.

Access is controlled to the western boundary by 2.4m high timber acoustic fence or weld mesh (depending on technical requirement tbc)

Fencing is set minimum of 8m from public routes with buffer planting to minimise visual intrusion.

### Primary Fence Line Type C

Sensitive headland location prohibits use of traditional security boundary.

Access is controlled through 'layers' of soft boundaries using a combination of 1.2m stock fence, planting and ditch systems and grazed agricultural buffer. This replicates the existing site condition to help minimise any visual impact, whilst also benefiting from overlooking/ natural supervision from the lodges.

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Fig. 51 - Site Security Framework Plan

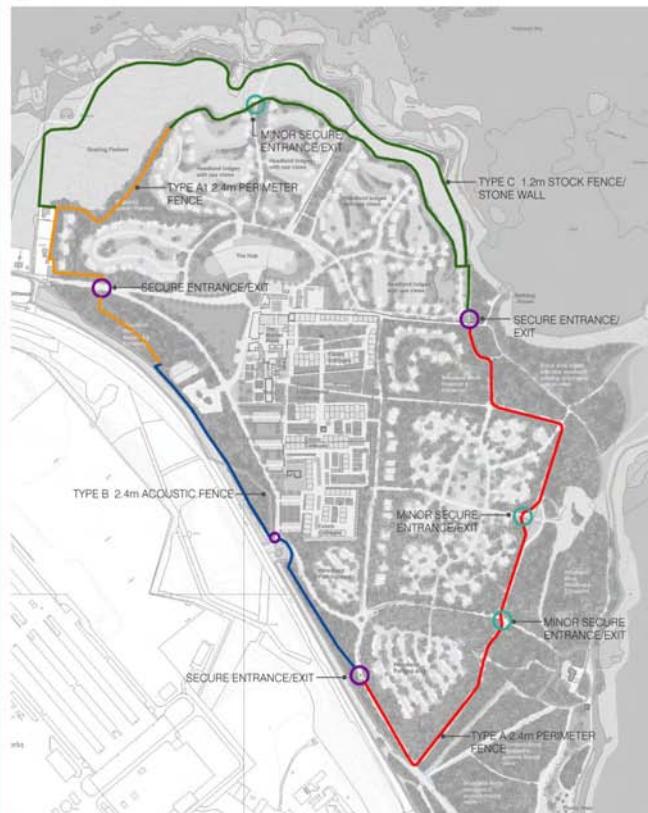


Figure 7: Penrhos Leisure Village, Design and Access Statement, November 2012, page 86

## Impact on Designated Landscapes

### COMMENT

10.2 An explanation of controlled public access would be useful and how this is to be achieved.

The D&A which accompanies the application contains site security diagrams with illustrative sections to demonstrate how secure boundaries can be accommodated without negative impacts on landscape character and views. The site security diagram and sections for the Penrhos site are illustrated opposite, and form pages 86 and 87 of the D&A.

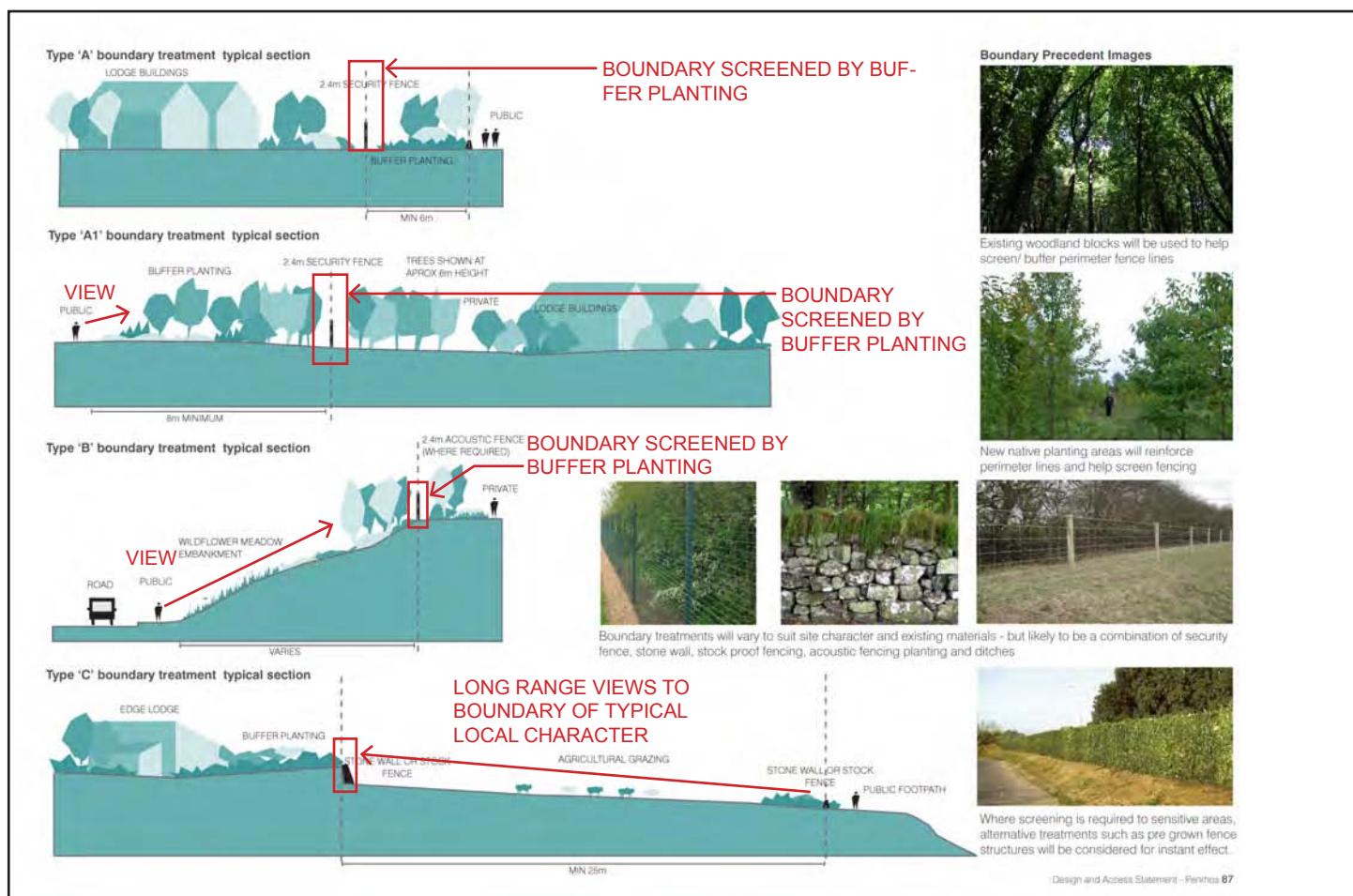


Figure 8: Penrhos Leisure Village,  
Design and Access Statement, November 2012, page 87

### 11.3.3 Site Structure - Security Contours

The proposed masterplan seeks to introduce new public access into this private site. The new lodge development will require a secure and robust boundary line to be established and this will be achieved through a variety of different boundary conditions, that respond to the character of the site. In order to maintain the 'natural' feel, boundary edge conditions have been developed to minimise visual intrusion, and where possible replicate the character of the existing site boundaries, whilst still maintaining a robust and secure boundary to the development.

#### Primary Security Line Type A

Existing woodland blocks used to provide screening to boundary. Primary access is controlled by a 2.4m weld mesh fence set back from public routes with a minimum depth of 5m buffer planting. Path edges may be defined by 1.2m stock fence or dry stone wall to provide a secondary informal defence line.

#### Primary Security Line Type B

Primary access is controlled by a 2.4m high timber acoustic fence or weld mesh (depending on technical requirement tbc) set back a minimum of 8m from the lodges to minimise visual intrusion. A 1:3 grass/planted slope with screen planting will act as a visual barrier to the adjacent road.

#### Primary Fence Line Type C

Access is controlled through 'layers' of soft boundaries using a combination of earth banks and ditch systems in keeping with the local character. A 2.4m security fence is offset a minimum of 2m from the ditch to provide a secure boundary.

#### Primary Fence Line Type D

Again access is controlled through 'layers' of soft boundaries using buffer planting and ditch systems where possible to be in keeping with the local character. A 1.2m stock fence is set back a minimum of 6m to the car park with buffer planting acting as a visual barrier.

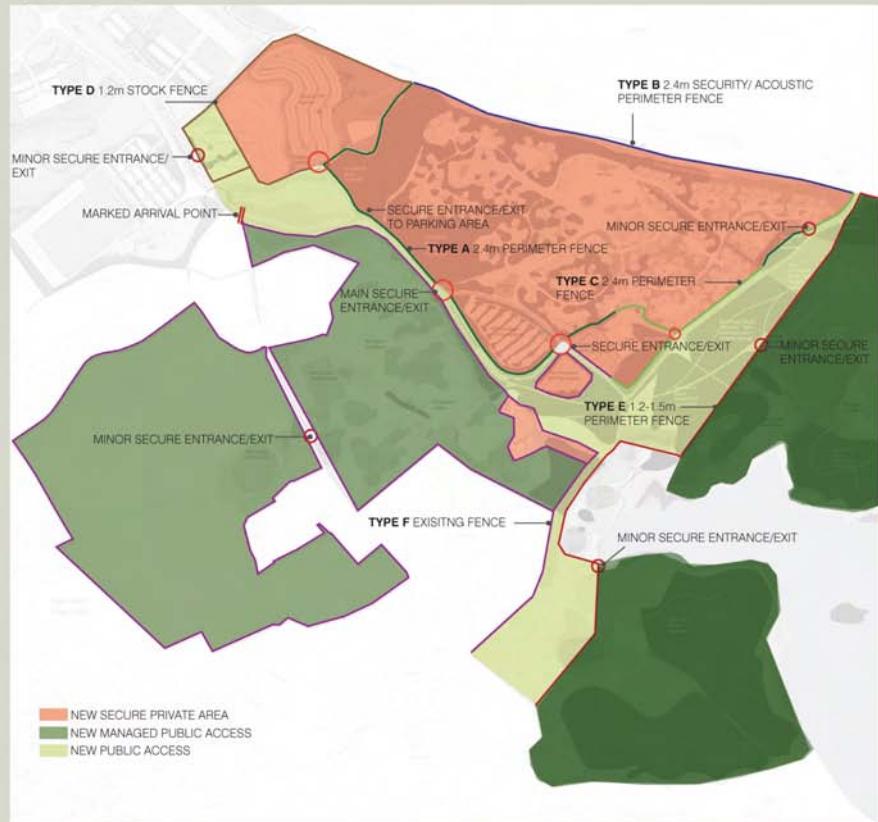
#### Primary Fence Line Type E

Access is controlled by a 1.2-1.5m stock fence which replicates the existing site condition to help minimise any visual impact. Fencing is set minimum of 8m from routes with buffer planting to minimise visual intrusion.

#### Primary Fence Line F

Retain existing boundary treatment and repair where necessary

Fig. 78 - Site Security Plan



128 Design and Access Statement - Cae Glas

Figure 9: Cae Glas site security,  
Design and Access Statement, November 2012, page 128

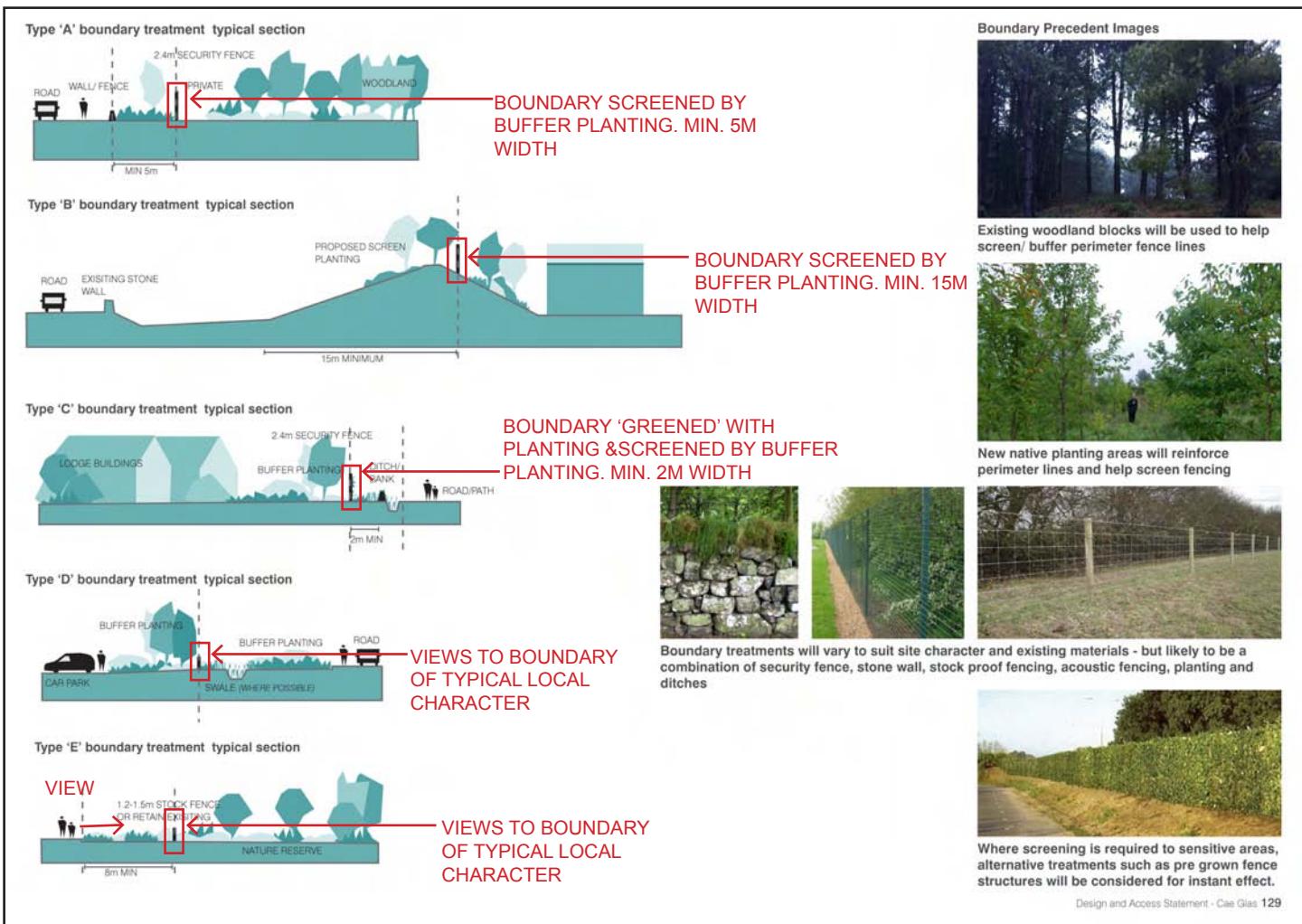


Figure 9: Cae Glas site security,  
Design and Access Statement, November 2012, page 129

## Predicted Impact on Important Landscape Elements

### COMMENT

Penrhos AONB - The assessment does not consider the potential impacts to the headland and potential loss of some part of this coastal landscape feature and as such the predicted Impact would be greater than neutral

The assessment considers the overall impact on the AONB designation that covers the Penrhos site, rather than considering the impact on particular areas or landscape elements individually. The overall assessment of the impact was assessed as neutral for the following key reasons:

#### Landscape:

- Substantial areas of woodland will be retained. An agreed and enhanced programme of management and maintenance will ensure that existing trees of value are retained and, over time, improve the overall quality of the woodland as well as promoting accessibility and enjoyment.
- A substantial area of agricultural land will be retained between the proposed headland lodges and the coastal edge.
- Key elements that contribute to the historic fabric will be retained, and their setting within a well managed landscape enhanced.
- New planting will be appropriate to the harsh coastal location, and in addition will use species that will contribute positively to reinforcing the landscape character.
- Ongoing management of the landscape will have a significant role in retaining and enhancing the AONB character within the site in the long term, which will offset the reduction in overall areas of woodland and agricultural land.

In addition, the proposals will contribute significantly to achieving the other aims of the AONB, namely the vision for a living and working landscape, with potential for recreational use and enjoyment.

Other key benefits will include:

- The Coastal Path will be retained and enhanced as part of the proposals. Enhancement works will include path improvements, such as widening where appropriate, and management of vegetation to restore views out to sea. The existing route is a permissive route only, but it is proposed that the route will become a permitted right of way, ensuring its future public accessibility in the long term.
- Historic built elements, part of the historic former Penrhos Estate, contribute significantly to defining the character of the site. They will be retained and the landscape around the buildings, several of which are listed, will be retained, enhanced and managed.
- Penrhos Coastal Park, which incorporates much of the woodland, will be retained as part of the proposals, although the publicly accessible areas will be reduced.
- The proposals include restoration and management of retained woodland and the lake area.
- The proposals include the creation of a new visitor centre at Beddmanarch House, located to the east within the site and accessible to general public.

In summary, the landscape and historic built fabric of the site have been the primary drivers behind the development of the masterplan to ensure the long term preservation and enhancement of the most valuable elements. This, along with the additional positive benefits of the proposals in relation to achieving the Vision for AONB, results in the overall assessment of impact as neutral.

### COMMENT

Cae Glas AONB - As the site is currently a mixture of predominantly agricultural land and woodland, the loss of agricultural land to development would have a greater impact than the predicted minor beneficial.

Extensive survey and assessment of the Cae Glas site was a key driver in developing the masterplan. As a result, the overall impact on the AONB was assessed as minor beneficial. There

will be some reuse of agricultural land to accommodate lodge development. The key reasons for the location of lodges within the farmland are summarised below:

- Agricultural land is classified as poor quality Grade 4 agricultural land, and was therefore considered the most appropriate location for lodges. This will allow the areas considered to be of highest landscape character value and quality within the site to be retained. The areas of highest quality and value were considered to be areas of established mixed woodland and the land to the east of the site around the inland sea, which gives the site its unique and special character.
- Substantial areas of agricultural land closest to Trearddur will be retained and will continue to be farmed. Existing landscape features of value within the farmland will be retained, managed and, where required, repaired and enhanced.
- Where agricultural land will be used for lodges, planting will be incorporated to provide screening and contribute positively to reinforcing landscape character. In addition, the proposed lodges will be high quality in terms of their design, will be sensitively sited, and will be subject to careful consideration in terms of materials to minimise visual impact. The potential for harm is therefore significantly reduced.

In addition, the proposals have the potential to deliver the following benefits to the AONB landscape:

- The whole site will be subject to ongoing management, and where beneficial, restoration and enhancement. Areas of important habitat along the inland sea boundary will be retained and managed as part of the proposed development.
- Areas of lower quality plantation and monoculture will be managed and enhanced.
- New areas of habitat will be created to further enhance the landscape.

When considered as a whole, the proposals will therefore result in positive impacts on the AONB landscape.

The proposals will also contribute significantly to achieving the other aims of the AONB vision. Incorporation of controlled public access to the site will allow people to appreciate the special qualities of the landscape. The incorporation of interpretive signage will enhance this aspect further. Interpretive signage plays an important role in educating visitors and enhancing their enjoyment and understanding of their environment.

#### COMMENT

Kingsland AONB - The loss of agricultural land use to development would be adverse and probably greater than minor adverse as predicted.

Residential development is not atypical of the AONB landscape, however, the proposed development will result in a negative impact due to the loss of agricultural land. The negative impacts from the loss of agricultural land will be minimised by:

- The area assessed as higher quality and value to the west of the site will be retained, managed and, where required, enhanced. Development will be contained within the lower quality agricultural land to the east of the footpath.
- The proposed dwellings will feature traditional materials, interpreted in a contemporary way, which will contribute positively to local character.
- The landscape proposals incorporate new hedgerow, to replace those that are currently degraded or will be lost as a result of the proposed development.
- The landscape proposals will also incorporate areas of high quality and high value semi-natural planting, as currently present to the west of the public footpath.

As a result of the sensitive approach to design and proposed mitigation methods, the overall impact on the site as a whole has therefore been assessed as minor adverse.

## AONB Cumulative Impacts

Consideration of the cumulative impact of all 3 sites on the AONB predicts that the overall impact would be neutral.

SITE	IMPACT ON AONB	CUMULATIVE IMPACT
Penrhos	Neutral	Neutral
Cae Glas	Minor Beneficial	
Kingsland	Minor Adverse	

## Impact on Tree Cover

### COMMENT

I would recommend a method statement is prepared to inform the approach to reducing potential impacts on existing/retained tree cover.

Appendix A contains detailed illustrative plans and principles to inform the approach to ensuring that the potential impacts on existing trees and woodland are minimised. The approach will be informed at the detailed design stage by a detailed tree survey.

## Visual Impacts

### Penrhos

VP2

### COMMENT

The significance of impact is likely to be minor to moderately adverse, rather than minor due to the change from agricultural land use to development on the headland.

The magnitude of the impact was assessed as 'low', resulting in an overall minor adverse impact for the following reasons:

- There will be a substantial area of open, agricultural land retained along the coastal edge.
- The area of woodland within the view will be retained.
- The high proportion of development predicted to be entirely screened from view by the retained woodland – indicated by the red line on the photomontage. The area of development outlined with blue is the only part of the development predicted to have some potential visibility.
- Development is not uncharacteristic within the view, and the AAM plant, particularly the chimney, forms a clearly visible component of the view.
- The set back of headland lodges from the coastal edge will mean that it is viewed against the backdrop of the AAM site, and will therefore form a minor addition to the view.
- The relatively long distance of approximately 1.7 miles between the viewpoint location and the site.

The photomontage view represents only a portion of the wider, panoramic views available at this point.

VP10

### COMMENT

The significance of impact year 1-3 is moderate to high adverse, rather than moderate, reducing to minor to moderately adverse years 10+.

The overall significance of the impact in years 1-3 was assessed as 'moderate adverse' primarily due to the predicted loss of views of historic elements within the former Penrhos Estate, and some loss of open agricultural land and views of woodland. However, a high adverse impact is avoided due to the following factors:

- The nature of the proposed development and the set back of development from the coastal edge viewpoint location allows a significant area of agricultural land to remain, which both retains existing landscape character and forms a buffer between the viewpoint and the proposed development.
- The character and quality of the proposed development is illustrated within the D&A that accompanies the application, and demonstrates how the proposed development responds to the sensitive landscape setting.
- As planting matures to provide visual screening and contribute positively to landscape character, the impacts are reduced to minor adverse significance.

A revised approach to minimising visual and physical impacts is illustrated in the new photomontages submitted with this report. The changes include reducing the area of retained open agricultural land slightly, by increasing the proposed extent of woodland planting so that it occupies higher ground levels, and provides significant extra visual screening. Strategic breaks in the proposed tree cover create strong visual connections to the historic built elements partially visible in the view. In addition, more significant planted mounding in the foreground would retain the historic rural character and also provide additional screening of lodges. The revised photomontage illustrates a reduction in the visual prominence of the lodges, and overall visual impact of the proposed development from this key viewpoint location. The overall impact is therefore considered to be minor adverse at worst.

## VP12

### COMMENT

The significance of the impact is likely to be moderate to high for years 1-3, reducing to minor-moderate year 10+ due to the loss of agricultural land to development, and due to the proximity of the view.

Development is not currently uncharacteristic within the view, however the assessment acknowledges the adverse impacts of additional development and loss of agricultural land. High adverse impacts are avoided due to the following principles:

- As for view 10 above, the nature of the proposed development and the set back of development from the coastal edge and viewpoint location on the coastal path allows a significant area of agricultural land to remain in the foreground of the view, which both retains existing landscape character and forms a buffer between the viewpoint and the proposed development.
- The planting, mounding and stone walls are not intended to fully screen the lodges from view as creation of substantial visual barriers would be inappropriate to the largely open views characteristic of the experience along the coastal path. Instead, focus has been given to the design of lodges to ensure their quality, and appropriateness in terms of scale, massing and materials. The orientation of lodges closest to the viewpoint has been changed and the overall reduced for those closest to the viewpoint. Further information on the design approach to the lodges is detailed within the D&A and would be subject to further development at the detailed design stage.
- As planting matures to provide visual screening and contribute positively to reinforcing the landscape character typical of the coastal edge, the impacts are reduced to minor adverse significance. The proposed planting will be selected on the basis of its suitability to the harsh coastal environment, and appropriateness to the locality in accordance with the principles set out within the D&A. Along with ongoing management, this will help ensure success of the planting. Detailed planting plans and schedules will be produced at the detailed design stage.

**COMMENT**

The significance of the impact is likely to be moderate to high in years 1-3, reducing to minor to moderate in years 10+ due to the loss of coastal headland/agricultural land and close proximity of bathing waters to development.

The location of viewpoint 13a was selected in order to illustrate the 'worst case scenario' in terms of visual impacts. The assessment acknowledges the adverse visual impacts due to the loss of open agricultural land within the view. The agricultural buffer retained along the coastal edge cannot be appreciated from this viewpoint and, in addition, planting will have minimal mitigating impacts. High adverse impacts are avoided due to the following principles:

- High quality design and appropriate scale, massing and use of natural materials.
- The proposed new Bathing House forms a high quality element in the foreground of the view, replacing the old, poor quality building that forms a prominent element within the view.

As part of the detailed design process, additional consideration would be given to the following elements in order to potentially minimise visual impacts further:

- roof form of lodges to reduce uniformity;
- orientation and layout of lodges to add variety and allow views of green roofs;
- density and spacing of lodges to minimise perceived overall massing;
- further consideration of lodge heights closest to the viewpoint of particular visual prominence.

Refer to Appendix 9.5 of the Landscape and Visual Impact Assessment, Kingsland View 2, which shows an alternative image of the proposals following a more detailed level of design applied to this section of the Kingsland site as an example of how this could be achieved. The photomontage illustrates how the visual impacts can potentially be reduced through the process of detailed design.

In addition, it is also anticipated that the tree growth will mitigate some of the negative impacts on the view after the initial 10 years illustrated in the photomontages. The photomontages illustrate the 'worst case scenario', incorporating cautious estimations of tree growth, due to the harsh coastal conditions. The photomontage also illustrates the view in winter, when visual screening from trees cover would be reduced, however, there is potential to incorporate more evergreen trees into the proposed mix in order to create more year round visual screening. The mix of species would be confirmed during the detailed design stage.

**COMMENT**

Winter screening of deciduous woodland may be compromised to some extent.

The photograph used was taken in winter in order for us to illustrate the 'worst case scenario'. The wireline photomontage shows that even when the trees are bare, the proposed woodland lodges are unlikely to be sufficiently visible to result in a change in the character of the view.

**Cae Glas****COMMENT**

The significance of the impact is more likely to be low to moderate year 10+ due to the loss of agricultural land to development.

The positive assessment of this view was arrived at primarily through consideration of who would constitute the visual receptors. At present, this route is not open to the public, there can therefore be no loss of views of agricultural land, as there are no views currently available whatsoever. If this route is opened up as part of the proposed development, the visual receptors will be holidaymakers or potentially visitors to Penrhos Country Park or Cae Glas Nature Reserve, who would expect views of the development. It is therefore considered that views of the high quality development and maintained planting within Cae Glas will be beneficial, contributing positively to legibility by visually connecting the Penrhos and Cae Glas sites. It is also likely that the planting along the A55 will fully screen views of the lodges as it continues to mature beyond 10 years.

VC8

**COMMENT**

Significance of the impact likely to be low rather than neutral.

The original assessment took into consideration the long term beneficial impacts of the proposed new tree planting in screening new development, and the potential for it to also provide screening of the industrial buildings which form part of the Alpoco powder coating plant in the distance. The proposed Hub building will be visible above the treeline and landform, however, the use of natural materials and an architectural form that reflects an agricultural style will allow the Hub to sit comfortably within the wider landscape setting. The landscape within the foreground of the view is largely unchanged, and retains an agricultural function with semi-natural landscape features. Proposed new planting will provide screening of development in the long term, however, the visual impact of the proposed development in the view prior to the establishment of planting is acknowledged.

VC9

**COMMENT**

Significance of the impact likely to be minor-moderate years 1-3, reducing to minor adverse year 10+.

The assessment of impacts from this viewpoint acknowledges the adverse impacts from partial visibility of car parking. The visuals illustrate the 'worst case scenario', showing the maximum number of parked cars. The impact is not considered to be any more than 'minor adverse' however, due to the existing dominating visual presence of the AAM plant within the view.

In addition to planting currently illustrated in the photomontage, there is also potential to include a new hedgerow and tree planting along the fence line in the foreground of the view to further mitigate against negative visual impacts from parked vehicles and, more importantly, provide some screening of the AAM plant in the background.

VC12

**COMMENT**

Significance of the impact likely to be low rather than negligible as some parts of the development are likely to be visible during winter months.

As with Penrhos view 13b, the wireline photomontage illustrates the 'worst case scenario' – i.e in winter when the trees are bare. The wireline indicates that even in winter, the dense tree cover and landform means that the vast majority of proposed development is highly likely to be completely hidden, as shown by the red outline. The wireline photomontage therefore demonstrates that there will be no real perceivable change to this view.

**COMMENT**

Significance of the impact likely to be low-moderate years 1-3 reducing to low years 1+ due to planting mitigation being less effective in winter and receptor sensitivity being high.

As with views 13b and 12 above, the wireline photomontage illustrates the 'worst case scenario' i.e in winter when the trees are bare. The wireline indicates that even in winter, the dense tree cover and landform means that the vast majority of proposed development is highly likely to be completely hidden, as shown by the red outline, and only a very small fraction of potentially visible development indicated with a blue outline. The potential long-range glimpsed views of rooftops are unlikely to be visually distinct from existing development, and therefore the character of the view is highly unlikely to change. The AAM chimney will continue to form the most visually prominent element within the view.

**Kingsland****VK2****COMMENT**

Significance of the impact likely to be moderate to high adverse years 1-3 reducing to moderate adverse Tear 10+ with mature planting.

The location of the proposed access into the Kingsland site has been adjusted following discussions with the Council. The updated photomontages reflect the revised masterplan layout. An illustrative photomontage was previously provided in Appendix 9.5 Viewpoints and Photomontages document, submitted as part of the Landscape and Visual Impact Assessment, which illustrated a more detailed design approach to the development within the viewpoint. The photomontage illustrates clearly how the potential landscape and visual impacts can potentially be minimised further at the detailed design stage, through more indepth consideration of layout, scale, massing, materials, landscape and architectural design. This more detailed level of design has been used for the production of the revised photomontages.

The character of the view will change substantially as a result of the proposed development, which is acknowledged within the assessment. This is unavoidable when moving from agricultural to residential land use, but impacts can be minimised as far as possible through good design and the incorporation of appropriate planting. The D&A incorporates design principles and outline design proposals for the new housing, which will result in the creation of high quality housing which is appropriate in terms of materials, scale, massing and layout. This will provide some mitigation against the loss of views of open agricultural fields. In addition, the relocation of the proposed site entrance has allowed reconfiguration of the housing layout to allow more visual permeability, retain more long range views, and reduce the overall visual impact.

Key mitigation measures incorporated into the design include:

- Smaller scale units fronting onto Kingsland Road to create a street frontage more reflective of typical local character.
- Set back of housing from Kingsland Road with substantial front gardens and planting to front garden boundaries.
- Layout of housing allows some long range views to be retained, and allows views to permeate into the development.
- Manipulation of ground levels to embed the housing into the landscape and respect the natural topographic variation.
- High quality housing, which uses a mix of traditional materials to visually 'break up' the scale and

overall massing of development.

- Use of evergreen planting and significant areas of new planting to provide year round visual screening.
- Subtle manipulations to layout and orientation of housing to visually reduce massing through the creation of views into the development, and beyond to agricultural land and existing development.

VK5

**COMMENT**

Significance of the impact likely to be moderate to high adverse years 1-3 due to density of layout and young planting reducing to moderate adverse year 10+.

The character of the view is likely to change substantially as a result of the proposed development, and this is acknowledged within the assessment. Again, this is recognised as an unavoidable consequence of development of previously undeveloped land, but negative impacts can be mitigated to some extent by high quality design. The location of the viewpoint was selected in order to illustrate the 'worst case scenario' in terms of visual impacts. However, the proposals aim to provide some mitigation against loss of views of agricultural land through high quality design, sensitive layout and use of appropriate materials. As with Viewpoint 2, there are further opportunities to incorporate mitigation as part of the detailed design stage, including further consideration of the design of housing, layout, scale, massing and density, although it is acknowledged that some adverse impacts are likely to remain.

VK6

**COMMENT**

Significance of the impact likely to be high years 1-8, reducing to moderate to high year 10+ due to loss of agricultural land and high density development.

As with viewpoint 5, the view is likely to change substantially as a result of the proposed development, and this is acknowledged within the assessment. However, the same mitigation measures will also be employed, with further opportunities at the detailed design stage.

