

CHAPTER 2: APPROACH

Introduction

- 2.1 This chapter describes the methodology used to undertake the EIA in accordance with the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 (SI 1999/293) (hereafter referred to as 'the EIA Regulations') and relevant guidance documents.
- 2.2 The chapter begins with a description of the general approach to assessment and EIA regulatory compliance for outline planning applications, including how the planning application and EIA are linked and the EIA parameters that have been used to assess the proposed development. EIA procedure and methodology is presented, then the stakeholder consultation process is explained and the responses of consultees listed, before the spatial and temporal scope of the assessment is discussed.
- 2.3 Following this, the receptors considered sensitive to the development are identified and the criteria used for impact prediction, assessing significance and implementing and securing mitigation measures are explained, along with any limitations and assumptions. With regard to the methodologies and assumptions for the technical assessments, each chapter has its own specific assessment methodology and assumptions, which are explained within the relevant sections.
- 2.4 A wide range of experience, resources and skills have been coordinated in order to bring together this application and the project team, along with their professional roles, is presented at the end of this chapter.

EIA Procedure and Methodology

EIA and Regulatory Compliance

- 2.5 The EIA Regulations, supported by precedents set by UK case law, have established a code of compliance for the process of EIA and the contents of environmental statements. As a result of two legal cases associated with Rochdale Metropolitan Borough Council¹, an ES supporting an outline planning application must present a description of the proposals that is reasonably representative of the eventual development and of sufficient detail to effectively identify, predict and assess the significance of any potential environmental impacts.
- 2.6 In order to meet these requirements, the applicant invites IOACC to impose planning conditions relating to the consistency of the outline application proposals with subsequent reserved matters applications. The purpose of applying planning conditions is to ensure that the scheme does not progress in a manner that is markedly different to that against which the environmental effects were assessed.
- 2.7 The applicant is of the opinion that by attaching planning conditions, the environmental assessment of the outline application, as presented in this ES, will be sufficient to support reserved matters applications. If, at the reserved matters stage, the detailed proposals exceed the assessment parameters of the EIA then further assessment may be required. This would be determined through further consultation with IOACC.

EIA Parameters

2.8 The EIA has identified and developed certain parameters for assessment. These parameters, along with the written description of the proposed development [Ref: Chapter 5: The Proposed Development], allow the likely significant effects of the proposals to be fully assessed and appropriate mitigation measures secured. The EIA parameters and other supporting plans are presented in Table 2.1 and Table 2.2 below:

Table 2.1: EIA Parameters and Relevant Plans

EIA Parameters	Purpose	Figure Reference
Outline Planning Application Boundary	Defines the extent of the site and the proposed development.	Figures 1.1
Land Use Plans	Defines the type of development permissible within the identified zones and the areas reserved for open space.	Figure 5.4 – 5.6
Maximum Building Heights Plans	Defines the maximum heights permissible within the identified zones.	Figure 5.7 – 5.9
Access and Movement Plans	Indicates the proposed points of access and pedestrian routes as well as the indicative primary vehicular route through the site.	Figure 5.10 – 5.12
Advance Planting Plans	Indicates the areas of the site that will be subject to tree planting before built development commences on the corresponding component site.	Figure 5.13 – 5.15
Access Plans	Defines the means of access to the site, which have been applied for in detail.	Figures 5.16 – 5.18

Table 2.2: Supporting Plans

Supporting Plans	Purpose	Figure Reference
Application Master Plan	To provide an indication of the likely development and allow informed assumptions to be used.	Figures 5.1 – 5.3

2.9 The Design and Access Statement, which accompanies the planning application, presents further indicative information about the proposed development.

Screening

2.10 Regulation 5 of the EIA Regulations makes provision for a developer to request a 'Screening Opinion' from the Local Planning Authority (LPA) to ascertain whether an EIA is required. This decision is based on the likelihood of significant effects arising in relation to the development proposals.

2.11 According to the EIA Regulations the proposals for Kingsland fall within Schedule 2, Section 10 'Infrastructure Projects', Subsection (b) 'Urban development projects' with a total area of over 0.5ha. The proposals for Penrhos and Cae Glas fall within Schedule 2, Section 12 'Tourism and Leisure', Subsection (c) 'Holiday villages and hotel complexes outside urban areas and associated developments' with a total area of over 0.5ha.

2.12 A request for a Screening Opinion was submitted to IOACC on 7th July 2011 and the Screening Opinion confirming the requirement for EIA was received on 1st September 2011. In order to fully comply with the EIA Regulations pertaining to screening, a further screening opinion was requested on 5th November 2012 to ensure that the reasons for the decision were presented by IOACC. The updated

Screening Opinion was issued on 8th November 2012. A copy of all screening correspondence is included at **Appendix 2.1**.

Scoping

2.13 Scoping is a process that, through research and consultation, identifies the environmental issues that require assessment as part of the EIA. This essentially refines the focus of the EIA on the important issues whilst also ensuring that no potentially significant areas are overlooked.

2.14 In accordance with Regulation 10 of the EIA Regulations, a formal request for a Scoping Opinion was made to IOACC in December 2011, in the form of an EIA Scoping Report

2.15 A formal Scoping Opinion was issued by IOACC on 8 March 2012. A copy of the Scoping Report and Opinion can be found in **Appendix 2.2**. A summary of the main comments are found in Table 2.3. All comments received have been addressed in the EIA.

Table 2.3: Comments on EIA Scope

Topic	Consultee	Comments
Socio-economics, Regeneration and Health	Valley Community Council	Objected on the grounds that the development would lead to the end of a community facility which is regularly used.
	Councillor Raymond Jones	Referred the application to committee on the grounds that there are too many extant planning permissions and that the proposed development would result in the loss of amenities.
	Isle of Anglesey Council – Planning Policy Unit	Outlined a need to consider the economic impact of the development and the economic state of the surrounding area fully.
	The Countryside Council for Wales	<i>The EIA should also assess impacts on access to, and enjoyment of, the countryside and coast particularly at Penrhos Coastal Park and on the Anglesey Coastal Path. This will require a comprehensive assessment of the existing use and value of the site and paths as well as how this is to be protected, and preferably enhanced, by the development.'</i>
Landscape and Visual	The Countryside Council for Wales	The Countryside Council for Wales state that in this specific instance the EIA will need to: <i>'Clearly justify why a proposal of this scale and nature is located in the AONB, rather than elsewhere within Anglesey. It will also need to clearly set out the impact of the development on the special qualities of the AONB and how this impact has been avoided and mitigated.'</i>
	Isle of Anglesey County Council – Department of Environment and Technical Studies	Identified that all 3 sites will require a full Landscape and Visual Impact Assessment as they lie within the Anglesey AONB. Additionally it is stated that the Cae Glas and Penrhos sites will require need to be covered by a tree survey and impact assessment report. It is also suggested that a conservation management plan is produced due to the presence of a number of Listed Buildings / Structures and important Garden artefacts / views within the Penrhos site which are of historical importance.

Topic	Consultee	Comments
Ecology	Isle of Anglesey County Council – Chief Environmental Health Officer	<p>The Chief Environmental Health Officer commented that:</p> <p><i>'Due to the past use of this site (and bearing in mind the proposed 'sensitive' end use, namely housing) I would be grateful if a contaminated land condition is included for this application. In the event of any contamination found a suitable Remediation Strategy should be prepared for the site which should be to the satisfaction of the Local Planning Authority.'</i></p>
	Valley Community Council	<p>Objected to the proposals on the following grounds:</p> <ul style="list-style-type: none"> ▪ The area is a haven for wildlife which would be at risk due to the development ▪ The plans will have a negative impact on the AONB
	Councillor Raymond Jones	<p>Referred the application to committee due to the environmental impact of the proposals</p>
	Environment Agency Wales	<p>With regard to ecology, Ruth Prichard on behalf of the Environment Agency stated that:</p> <p><i>'We would expect to see the results from a full ecological survey, (carried out by a qualified ecologist), with particular reference to wetland features, water courses and their associated species. Where presence of a protected species and/or habitat is found, full mitigation methods will need to be outlined. Where certain habitats are to be replaced by others e.g. a wetland area with a lake, as proposed, evidence will need to be submitted to justify the decision and prove that it would be a favourable ecological move.'</i></p>
	The Countryside Council for Wales	<p><i>There are also potentially significant impacts of this proposal on the Beddmanach-Cymyran Site of Special Scientific Interest, and protected species.</i></p>
Archaeology and Heritage	Cadw	<p>Cadw stated that they are content that the consultants have in place a strategy to evaluate the impact of the proposed development on the Historic Environment.</p>

Topic	Consultee	Comments
Drainage and Flood Risk	Environment Agency Wales	<p>Ruth Prichard on behalf of the Environment Agency concluded that:</p> <p><i>'Where no formal outlets exist (or are visible) from ponds/marshy areas, it is recommended that flood routeing plans are produced from these areas. The plan should then be used to determine positions of buildings and/or landscaping to ensure that routes are not compromised. Such plans would also be beneficial for the other two sites.'</i></p> <p><i>The Flood Consequence Assessment should be carried out as per the requirements of TAN 15 Development and Flood Risk (July 2004) and have due consideration to the effects of climate change using current guidelines and using the appropriate lifetime of development.'</i></p> <p>Additionally, at Kingsland, it will need to be demonstrated that no additional volumes/peak runoff is directed towards the watercourse at Cae Rhos Estate.</p> <p>Deemed that the overall approach seems acceptable and that the use of SUDS as proposed is fully supported.</p>
	Welsh Water	<p>Provided a public sewer record and acknowledged on-going discussions with members of Welsh Water regarding the requisitioning of sewers under section 98 to 101 of the Water Industry Act 1991.</p> <p>Adds that:</p> <p><i>'The discharge of foul flows only from the proposed development site can be accommodated within the public sewerage system.'</i></p> <p>Welsh Water concluded that surface water flow will have to be disposed of separately by using soakaways or discharging directly to a watercourse for example. Advise that hydraulic modelling should be undertaken.</p>
	Isle of Anglesey Council – Chief Engineer	<p>Requested that the applicant discusses and agrees their surface water drainage proposals with the Local Planning Authority prior to the submission of a formal application.</p>
Transport and Access	Isle of Anglesey Council – Senior Engineer	<p>Evan Jones, a Senior Engineer at the Isle of Anglesey Council briefly stated that:</p> <p><i>'The submitted Scoping Report notes that a Scoping Study for the Transport Assessment will be produced to formally agree the content of the assessment with the Council. I therefore have no further comment to make at this stage.'</i></p>
	Valley Community Council	<p>Objected to the development on the grounds that the plans involve the closure of footpaths.</p>
	Network Rail	<p>Network Rail asked that they are informed of when the construction phases of the development will begin. They also attached Network Rail's standard asset protection measures which should be adopted as a minimum.</p>

Topic	Consultee	Comments
	Isle of Anglesey Council – Highways and Transportation	The Highways and Transportation Department broadly identified the footpaths for protection and state that they should not be affected by the proposed development.
	Isle of Anglesey Council – Highways and Waste Management	In short stated that: <i>'There is an opportunity for co-operation to provide a high quality pedestrian facility which would benefit both the development and the Coastal Path.'</i>
Planning Policy	Isle of Anglesey Council – Planning Policy Unit	Proposed a number of small changes and/or amendments to paragraphs 5.1, 6.2 and 6.30 of the Scoping Report.
Lighting	British Astronomical Association's Campaign for Dark Skies	<p>With regard to lighting, John Rowlands of the British Astronomical Association stated that:</p> <p><i>'I am glad to see acknowledgement of an intention to follow SPG10 at 19.4. I hope that close adherence to the spirit of that SPG – very careful control of lighting installations to reduce environmental impact – will follow in the actual development.</i></p> <p><i>I am very concerned about the very sparse level of detail given about the methodology of assessing existing light levels at the site at 19.5. From the few details provided, the method of assessment would be wholly inadequate and probably flawed.</i></p> <p><i>I welcome the clear recognition that the sites lie within the AONB designation. This clearly places particular responsibilities upon the developer and its advisors to deliver a high-quality and hopefully exemplary, trend-setting low-impact lighting scheme. By doing so, the developer will, as HOW consultants accept at 19.2, reduce energy costs. The capital price of low-light pollution units is no greater than other, more wasteful forms of lighting and there is now a wider range of design options available.</i></p> <p><i>The island's AONB office, in partnership with other stakeholder on the island, is currently developing a local dark sky park or possible island-wide low light pollution policy. This development could therefore prove to be an ideal site for showcasing how environmental impact in general, and light pollution in particular, can be effectively reduced.'</i></p>

2.16 To summarise, as a result of the scoping exercise, the areas that were considered to have potentially significant environmental effects and which should be considered in detail in the EIA are as follows:

- Socioeconomics;
- Landscape and Visual;
- Ecology and Nature Conservation;
- Archaeology and Heritage;
- Ground Conditions;
- Drainage and Flood Risk;
- Transport & Access;
- Air Quality;
- Noise;

- Waste;
- Lighting;
- Utilities; and
- Cumulative Impacts.

Consultation

2.17 An integral part of the EIA process is consultation with a range of statutory and non-statutory consultees. Consultation was undertaken at the scoping stage to identify any initial environmental concerns associated with the proposed development that required examination in greater detail in the EIA. These consultees are as shown in Table 2.3, above.

2.18 Consultation was also undertaken as part of the technical assessments as a means of establishing the environmental baseline and assessment methodologies. This included identifying sensitive components of the environment, e.g. humans, organisms or physical characteristics, or potential effects and reaching consensus on suitable mitigation measures. Details of further consultation undertaken as part of each technical assessment is described further within each technical chapter.

Pre-Application Discussions

2.19 Consultants acting on behalf of the Applicants have engaged with IOACC and all relevant statutory and regulatory bodies as part of an extensive pre-application discussions exercise. Pre-application meetings between the professional team have taken place over approximately 18 months where a range of technical and design issues have been discussed to ensure a 'development team' approach was established.

2.20 Of note is the series of meetings that have taken place between the Applicant's design team and CCW, who are responsible for the protection of the AONB. In order to fully understand CCW's position on the proposals and to address any concerns, a series of meetings were held, four of which were chaired by Welsh Government at their offices in Llandudno Junction.

2.21 Due to the size of the development in an AONB, CCW provided comment on the evolving design and their particular areas of concern. They also made recommendations in relation to the scope of the landscape and visual assessment and ecological surveys. CCW also provided a formal response to the draft Supporting Planning Statement, identifying all relevant planning policy tests at the national level with which the application must comply.

2.22 Other pre-application meetings were held with Cadw, as national heritage adviser, the RSPB, Highways Authority and members of the NHS responsible for Health Impact Assessment, as well as officers from IOACC.

Community Consultation

2.23 A public exhibition was held at Holyhead Town Hall and was opened to the public on Friday 21st October 2011 (between 2pm and 8pm) and Saturday 22nd October (between 10am and 2pm). The format of the Public Exhibition was agreed with Council Officers and allowed sufficient time for anyone with an interest in the future development of the site to view and comment upon the proposals.

2.24 The Public Exhibition was widely advertised and all invitations and material were provided in both Welsh and English language. A flyer was sent to local residents

and businesses. The Public Exhibition was also advertised in the Daily Post on 14th October 2011. Posters were also displayed in key public buildings within the area leading up to the Public Exhibition. Through the duration of the event, appropriate signage to the Public Exhibition was displayed outside Holyhead Town Hall.

- 2.25 The exhibition was manned by members of the development team who were on hand to answer questions and to explain the proposals. Large scale coloured drawings were presented on 14 A1 boards in both Welsh and English language to encourage participation.
- 2.26 The applicants have sought to address comments through design changes where appropriate. This is discussed further in Chapter 4: Alternatives and Design Evolution.
- 2.27 Further detail on the consultation process can be found in the Statement of Community Involvement (HOW Planning, 2012) submitted with the planning application.

EIA Methodology

- 2.28 The ES has been prepared to fully comply with Schedule 4 (Part I and II) of the EIA Regulations: '*Information for Inclusion in Environmental Statements*'; and in accordance with the guidance set out in the following publications:
 - Environmental Impact Assessment – A Guide to procedures, Department of the Environment, Transport and Regions, DETR (2000);
 - Preparation of Environmental Statement for Planning Projects that require Environmental Assessment – A Good Practice Guide, DoE (1995);
 - WG Circular 11/99 – Environmental Impact Assessment;
 - Office of the Deputy Prime Minister (ODPM) Note on EIA Directive for Local Planning Authorities (1999 Regulations).

Consistency

- 2.29 To assist the reader in understanding the technical assessments a consistent approach has been adopted throughout the EIA to ensure that likely significant effects are identified and evaluated in a transparent manner. Each environmental assessment topic has adopted the following approach:
 - Baseline Assessment and Identification of the Study Area;
 - Identification of Sensitive Receptors;
 - Identification of Potential Effects during Construction and Operation of the Proposed Development (including indirect, direct, adverse and beneficial);
 - Assessment of Impact Significance;
 - Identification of Mitigation Measures; and
 - Assessment of Residual Effects.

Cumulative Effects

- 2.30 An assessment of cumulative effects, which is described as the potential effects of the proposed development in conjunction with changes arising from other developments in the surrounding area, is presented in Chapter 21: Cumulative Impacts.
- 2.31 In this instance, the assessment of cumulative effects relates primarily to consideration of the proposed development in conjunction with the proposed

developments of Parc Cybi, the Renewable Energy Plant at the AAM core site and Holyhead Waterfront, which were granted planning permission (or Section 36 Consent in the case of the Renewable Energy Plant) in May 2012, September 2011 and June 2012 respectively.

Geographical and Temporal Scope of Assessment

2.32 Environmental impacts can occur directly or indirectly both within and outside of the application boundary. As such, the baseline studies and environmental assessment take into consideration potential effects over a wider area, as appropriate. The geographical scope of assessment is described in each individual technical chapter.

2.33 The environmental baseline studies undertaken as part of the EIA consider the current conditions of the site. If planning consent is granted, the construction period is scheduled to begin in 2014, based on assumptions made regarding the progress of reserved matters applications. It is not considered that the baseline conditions would change significantly during this time such that overall reassessment would be required. However, it is acknowledged that some studies, particularly ecological surveys, are likely to require revisiting to ensure that the findings remain accurate and that the proposed mitigation is still appropriate. If the baseline conditions change materially in future years then the applicants acknowledge that further assessment may be required. The scope of any further studies to support reserved matters applications will be formally agreed through consultation with IOACC.

Impact Prediction, Significance and Classification

2.34 The EIA Regulations state that:

...an ES should include a description of the likely significant effects of the development on the environment, which should cover the direct effects and any indirect, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative effects of the development, resulting from:

- (a) the existence of the development;*
- (b) the use of natural resources;*
- (c) the emission of pollutants, the creation of nuisances and the elimination of waste.*

2.35 Predictions of environmental impacts are carried out using quantitative methods, or in some cases, qualitative terms using expert opinion. All assumptions used and any areas of uncertainty are defined in the relevant chapters.

2.36 The assessment of impact significance will be undertaken for all potential effects to determine their relative importance. The following criteria will be considered when assessing their significance:

- Magnitude (size of effect);
- Spatial extent (size of the area affected);
- Temporal extent (short, medium, or long term);
- Nature of the effect (direct or indirect, reversible or irreversible);
- Sensitivity of the surrounding environment and receptors;
- Inter-relationship between effects;
- International, national or local standards; and,
- Relevant planning policy.

2.37 Wherever appropriate, the significance criteria below will be used to categorise predicted effects which can be either adverse or beneficial. Where alternative classifications have been used, they will be explained in the methodology sections within each technical assessment.

Table 2.4: Significance Criteria to be adopted for impact assessment

Significance	Criteria
Severe	Only adverse impacts are assigned this level of importance if they represent key factors in the decision-making process. These effects are generally, but not exclusively, associated with sites and features of international or national importance and resources/features which are unique and which, if lost, cannot be replaced or relocated.
Major	These impacts are likely to be important considerations at a regional or district scale but, if adverse, are potential concerns to the project, depending upon the relative importance attached to the issue during the decision making process. Mitigation measures and detailed design work are unlikely to remove all of the impact upon the receptor.
Moderate	These impacts, if adverse, while important at a local scale, are not likely to be key decision making issues. Nevertheless, the cumulative effect of such issues may lead to an increase in the overall effects on a particular area or a particular resource. They represent issues where impacts will be experienced but mitigation measures and detailed design work may ameliorate/enhance some of the consequences upon affected communities or interest. Some residual impact may still arise.
Minor	These effects may be raised as local issues but are unlikely to be of importance in the decision making process. Nevertheless, they are of relevance in the detailed design of the project and consideration of mitigation measures.
Negligible	Potential impact is beneath levels of perception, within normal bounds of variation or within the margin of forecasting error.
No Impact	No impact is predicted.

Mitigation

2.38 The development of measures designed to avoid, reduce or offset significant adverse environmental effects associated with a proposal is one of the key elements of EIA. Measures to mitigate any environmental effects of the proposed development have been incorporated into the proposals throughout the design evolution. Where environmental mitigation measures have not been integrated into the proposals through design, it is expected that all other requisite measures will be secured by appropriate planning conditions. Descriptions of these mitigation measures are included in the appropriate technical chapters and summarised in Chapter 22: Summary of Mitigation and Residual Effects.

Limitations and Assumptions

2.39 The EIA has been undertaken based on the planning application drawings, parameters plans and descriptions of the development submitted as part of the planning application. The technical assessments have been based on the current land uses and the existing baseline conditions. Any assumptions made or limitations relating to individual technical assessments are presented, where applicable, in the relevant technical chapters.

The Project Team

2.40 The EIA has been commissioned jointly by the applicants. This ES has been compiled using a wide range of sources and with inputs from technical specialists. The organisations and their roles in the project team are listed in Table 2.5, below:

Table 2.5: The Project Team

Company	Discipline
Land and Lakes (Anglesey) Ltd	<ul style="list-style-type: none"> • Applicant
Planit-IE	<ul style="list-style-type: none"> • Masterplanners • Landscape and Visual Impact Assessment
Purcell	<ul style="list-style-type: none"> • Architects • Heritage Advisers
HOW Planning	<ul style="list-style-type: none"> • Planning Consultants • EIA Co-ordination • Sustainability • Welsh Language Assessment
Capita Symonds	<ul style="list-style-type: none"> • Ground Conditions • Drainage and Flood Risk
WSP	<ul style="list-style-type: none"> • Air Quality • Noise • Socioeconomics, Regeneration and Health • Lighting • Energy • BREEAM/Code for Sustainable Homes
Gwynedd Archaeological Trust	<ul style="list-style-type: none"> • Archaeology and Heritage
Curtins Consulting	<ul style="list-style-type: none"> • Transport and Access
TEP	<ul style="list-style-type: none"> • Ecology and Nature Conservation
Ynys Resources	<ul style="list-style-type: none"> • Waste
Utilities Partnership Ltd	<ul style="list-style-type: none"> • Utilities
Regeneris	<ul style="list-style-type: none"> • Economic Consultants

¹ *R v Rochdale Metropolitan Borough Council ex parte Tew* [1999] 3 PLR 74 and *R v Rochdale Metropolitan Borough Council ex parte Milne* [2001] 81 PCR 27