

Your ref:  
Our ref: GH/JC/874

22 October 2013

Gwyndaf Jones  
Isle of Anglesey County Council  
Council Offices  
Llangefni  
Anglesey LL77 7TW

### **By Email & Post**

Dear Mr Jones

### **LAND AND LAKES PROPOSALS AT HOLYHEAD APPLICATION REF: 46C427K/TR/EIA/ECON**

I am writing further to your Council's consideration of this application at its meeting on 2 October 2013. At that meeting the Committee indicated a provisional decision to refuse planning permission on two grounds, namely "over development" in the countryside and detrimental impact on the AONB (Area of Outstanding Natural Beauty). In accordance with the County Council's constitution (paragraph 4.6.12), because that decision was contrary to the Officer's recommendation to approve the application, the item was deferred to the following meeting so as to allow Officers to report further on the matter. We understand that the application is to be reconsidered at the Planning Committee scheduled for Wednesday 6 November.

Members have the benefit of a very full and highly detailed Officers Report which addressed all relevant aspects of the application. The purpose of this letter is to highlight those aspects of the report, which summarises and assesses the substantial amount of information submitted by the Applicant in support of the scheme, in order to directly address the two grounds of objection the Committee identified.

#### **Over Development**

The rationale for the Committee's judgement that the scheme comprises "over development" is unclear. Over development is generally characterised by one or more of a number of factors which suggest that the proposals exceed the technical or environmental capacity of the application site. Neither circumstance applies here.

None of the technical consultees who have carefully considered the application proposals raise any objections. It is particularly noteworthy that the highways department of the Council are content that the traffic generation forecast to arise from the scheme can be safely and adequately accommodated on the road network, with certain improvement works being funded by the developer. This conclusion flows from independent assessment work by expert consultants carried out on behalf of the Council.



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Another symptom of “over development” is an inability to provide adequate car parking within a development. In relation to all three elements of the proposed scheme the Council is content that adequate parking and servicing arrangements can be provided to meet the required standards. Scale and massing could be an indication of over development and may be indicated by an unacceptable visual impact which could not be adequately mitigated. The Council’s Landscape Officer does not object to the proposals, nor does Natural Resources Wales (NRW) subject to refinement of certain aspects of the mitigation proposals. The Council’s Tree Officer reaches the same conclusion. Finally as there are Listed buildings within the application site there is potential for new development to adversely impact upon their value and setting. The Council’s Conservation Officer raises no objection: indeed the Officer’s Report confirms that the Officer is “generally supportive of this application which seeks to breathe new life back into the Penrhos estate.”

A detailed exercise has been undertaken to identify the extent of the new buildings, roads and pathways which would be created once all the developments have been completed. The total surfaced area of the three sites is just 17% of the application site area; put another way 83% of the total site will be enhanced through active, long term management and stewardship, with public access to key areas secured in perpetuity.

In summary, when considered against any of the normal indicators of a site which is “over developed” we would suggest that there is no evidence to support the contention that the application proposals could be described as falling within this category.

### **Impact on the Area of Outstanding Natural Beauty**

The second limb of the Committee’s concern related to impact upon the AONB. This matter is discussed extensively in the Officer’s Report which carries out a detailed assessment of the application against Planning Policy Wales (PPW) which prescribes the relevant tests. It concludes:

- A need, in terms of national considerations, exists for all elements of the proposal. This includes a national need to support the planned nuclear new build power station at Wylfa and a tourism/economic need for the long term uses which would follow initial occupation by construction workers;
- An inability to accommodate the proposals elsewhere outside the AONB given the particular locational requirements and the interdependency between the various sites/uses. The need for a coastal location is particularly important in relation to the Penrhos Leisure Village;
- That there would be a severe negative impact on Holyhead and the sub-regional economy by refusing the application, as none of the economic benefits would be realised and tourism industry could be severely impacted without a coherent worker accommodation proposal; and
- As noted above, whilst there will be short term impacts on the landscape, the detailed mitigation proposals which are put forward, and which have been discussed with the Council’s Landscape Officer and NRW, will moderate these as the scheme (and its associated planting) matures.

In reaching the overall assessment in terms of impact on the AONB, it is appropriate to attach significant weight to the economic benefits, as the Council is required to do under the latest advice in PPW. National Planning Policy calls on Local Planning Authorities to “*adopt a positive and constructive attitude to applications for economic development, taking into account the likely economic benefits based upon robust evidence.*” “Economic

development" is any development of land that generates wealth, jobs and incomes: the leisure village proposals at Penrhos and Cae Glas clearly fall within this category. PPW makes clear that economic benefits should be fully understood, and given equal consideration alongside social and environmental issues. It goes on to say that there will be occasions where the economic benefits will outweigh social and economic considerations.

The Council's Economic Development Unit has concluded that this proposal is "*an opportunity to transform the economic, environmental and social composition of Holyhead and the surrounding areas, which given the current economic climate is extremely positive and very much welcomed.*" It goes on to say that this is a "unique opportunity" to capitalise on the substantial inward investment of Wylfa, the Celtic array, Lateral Power and a number of other major development proposals, including this scheme by Land and Lakes.

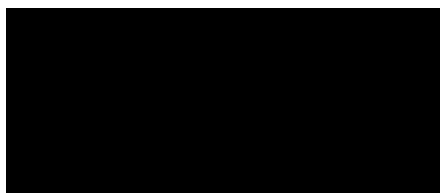
## **Summary**

In our view there is no robust evidence to support a refusal of planning permission based upon the two grounds identified by the Committee in October. Drawing upon the Council Officer's own assessment it is clear that this scheme design cannot rationally be described as "over development" and that when tested against National Planning Policy relevant to development in AONB, the scheme meets all the key criteria.

Whilst there will inevitably be some impacts from the development of this nature, there will be huge economic and regenerative benefits associated with its implementation. PPW advises Local Planning Authorities to attach great weight to these benefits, which have a particular resonance in areas like Holyhead where jobs, training and economic regeneration is urgently needed.

I hope these comments are helpful and that Members will consider them carefully when debating this application at its forthcoming meeting.

Yours sincerely



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